

## ADMINISTRATIVE PANEL DECISION

Streamlight, Inc. v. 朱杰 朱杰 (jie zhu)

Case No. D2025-4403

### 1. The Parties

The Complainant is Streamlight, Inc., United States of America ("US"), represented by Quarles & Brady LLP, US.

The Respondent is 朱杰 朱杰 (jie zhu), China.

### 2. The Domain Name and Registrar

The disputed domain name <streamlightdsled.com> (the "Disputed Domain Name") is registered with Chengdu West Dimension Digital Technology Co., Ltd. (the "Registrar").

### 3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the "Center") on October 25, 2025. On October 27, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On October 28, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Disputed Domain Name which differed from the named Respondent (Registration Private) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 28, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint in English on October 31, 2025.

On October 28, 2025, the Center informed the parties in Chinese and English, that the language of the registration agreement for the Disputed Domain Name is Chinese. On October 31, 2025, the Complainant confirmed English to be the language of the proceeding. The Respondent did not submit any comment on the Complainant's submission.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the "Policy" or "UDRP"), the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules").


In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent in English and Chinese of the Complaint, and the proceedings commenced on November 5, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 25, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on December 8, 2025.

The Center appointed Andrew Sim as the sole panelist in this matter on December 12, 2025. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

#### 4. Factual Background

The Complainant is a corporation organized under the laws of the State of Delaware, US. It is a Pennsylvania-based company that designs and manufactures portable lighting products, including flashlights, headlamps, weapon-mounted lights, and other related products and accessories, and has operated the STREAMLIGHT brand globally for these goods since at least 1973.

The Complainant holds registered trademarks for STREAMLIGHT (with and without stylization) (the "STREAMLIGHT Trademark") in various jurisdictions around the world, for example:

Jurisdiction	Mark	Registration Number	Registration Date	Class Covered	Status
US	STREAMLIGHT	1479512	March 8, 1988	11	Registered
	STREAMLIGHT	5586298	October 16, 2018	9	Registered
	 STREAMLIGHT	2926292	February 15, 2005	11	Registered
China	STREAMLIGHT	65270340	March 21, 2024	11	Registered

The Panel notes that the above registrations cover China, where the Respondent is located in.

In addition to the STREAMLIGHT Trademark, the Complainant also holds a number of ancillary trademarks in Class 11 registered in the US (for example, PROTAC, STRION, and SURVIVOR) ("Ancillary Trademarks").

Furthermore, the Complainant operates the primary domain name <streamlight.com> as its principal website on which the Complainant offers flashlights, flashlight accessories, and other related goods (the "Principal Website"). The STREAMLIGHT Trademark is displayed prominently within the header of the Principal Website.

The Complainant also claims that it has advertised, promoted, offered and sold its goods in connection with the STREAMLIGHT Trademark to the public through channels of trade in commerce, including the Principal Website, and as a result of such extensive use, the STREAMLIGHT Trademark is known to identify the Complainant and its brand of flashlights, flashlight accessories, and other related goods.

The Disputed Domain Name, <streamlightdsled.com>, was registered on December 3, 2023. Based on the Complainant's evidence, upon visiting the Disputed Domain Name, it resolved to a website (the "Respondent's Website") that prominently displayed the Complainant's STREAMLIGHT Trademark within the

website's header. The STREAMLIGHT Trademark and certain Ancillary Trademarks (12 at least, according to the Complainant) also appeared in product images and were used as part of the names of the products listed on the Respondent's Website. The Complainant conducted a test purchase on the Respondent's Website, but no product was delivered despite payment being made.

The Panel would also note that while the Registrar has confirmed that the Disputed Domain Name has been placed on lock, upon the Panel's own visit to the Disputed Domain Name, the Respondent's Website remains accessible.

Little information is known about the Respondent. Available information provided by the Registrar covers only the registrant's name, postal address, telephone number, fax number, and email address.

## **5. Parties' Contentions**

### **A. Complainant**

The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Disputed Domain Name.

First, the Complainant contends that the Disputed Domain Name is identical and/or confusingly similar to the Complainant's STREAMLIGHT Trademark and its well-known STREAMLIGHT brand, as the Disputed Domain Name contains the STREAMLIGHT Trademark in its entirety plus the combination of the letters "dsled". The Complainant contends that the term "led" (within the additional letters "dsled") is associated with light emitting diode technology, which is present in nearly all of the Complainant's current products. The fact that the STREAMLIGHT Trademark is used in lower-case letter format in the Disputed Domain Name is a difference without legal significance.

Second, the Complainant contends that the Respondent lacks rights or legitimate interests in the Disputed Domain Name. This is based on that:

- (a) The Complainant has no relationship with the Respondent, and the Respondent is not authorized to use any of the Complainant's trademarks, including the STREAMLIGHT Trademark;
- (b) There is no evidence that the Respondent is commonly known by the Disputed Domain Name or the STREAMLIGHT Trademark;
- (c) The Respondent is using the Respondent's Website to sell counterfeit products of the Complainant; and
- (d) The Complainant's STREAMLIGHT Trademark and certain Ancillary Trademarks are being used on the Respondent's Website without authorization.

Third, the Complainant contends that the Disputed Domain Name was registered and is being used in bad faith. This is based on that:

- (a) The Respondent undeniably had knowledge of the Complainant's rights in the STREAMLIGHT Trademark when it chose to use the identical name in connection with the Disputed Domain Name, as the STREAMLIGHT Trademark was registered long before the registration of the Disputed Domain Name and is highly distinctive and widely known;
- (b) The Disputed Domain Name and the Respondent's Website use the Complainant's STREAMLIGHT Trademark verbatim;

- (c) The Respondent's registration of the Disputed Domain Name was for the purpose of benefitting from the reputation of the STREAMLIGHT Trademark; and
- (d) The use of the Disputed Domain Name to sell counterfeit goods is a clear and obviously example of bad faith registration and use on the part of the Respondent.

## **B. Respondent**

The Respondent did not reply to the Complainant's contentions.

## **6. Discussion and Findings**

### **6.1 Language of the Proceeding**

The language of the Registration Agreement for the Disputed Domain Name is Chinese. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including:

- (a) The Complainant is located in the US and does not have any knowledge of Chinese. To proceed in Chinese, the Complainant would have to locate and retain the services of a Chinese translator which would likely impose significant cost and time burdens;
- (b) The Disputed Domain Name as well as the content on the Respondent's Website are in English and/or Latin characters, which suggests that the Respondent has knowledge of English; and
- (c) English is the primary language for international relations.

The Respondent did not make any specific submissions with respect to the language of the proceeding. This is despite the fact that the Center had sent the notification of the Complaint which includes instructions on the language of the proceeding to the Respondent in both Chinese and English.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs (see WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.5.1).

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

### **6.2 Substantive Issues**

Paragraph 4(a) of the Policy states that, in an administrative proceeding, the Complainant must prove each of the following three elements:

- (a) the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (b) the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and

(c) the Disputed Domain Name has been registered and is being used in bad faith.

For the below reasons, support for the Complaint can be found due to the satisfaction of the three conditions for the Disputed Domain Name.

#### **A. Identical or Confusingly Similar**

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trademark and the Disputed Domain Name. [WIPO Overview 3.0](#), section 1.7.

Based on the Complainant's trademark registrations for the STREAMLIGHT Trademark, as partially extracted in section 4 above, the Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the STREAMLIGHT Trademark is reproduced within the Disputed Domain Name. Although the addition of the letters "dsled" may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the Disputed Domain Name and the STREAMLIGHT Trademark for the purposes of the Policy. [WIPO Overview 3.0](#), sections 1.8. The generic Top-Level Domain ".com" is typically disregarded in the confusingly similarity test. [WIPO Overview 3.0](#), sections 1.11.1.

Accordingly, the Disputed Domain Name is confusingly similar to the Complainant's STREAMLIGHT Trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. The Panel finds the first element of the Policy has been established.

#### **B. Rights or Legitimate Interests**

Paragraph 4(c) of the Policy provides a list of circumstances in which the Respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the difficult task of "proving a negative", requiring information that is often primarily within the knowledge or control of the respondent. As such, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production on this element shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on the complainant). If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the Disputed Domain Name. The Respondent has not rebutted the Complainant's prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the Disputed Domain Name such as those enumerated in the Policy or otherwise.

From the overall appearance of the Respondent's Website as described in section 4 above, the Panel finds that the Respondent's Website is being used for illegal or illegitimate activities as the Respondent's Website is clearly an illegal imitation of the Complainant's Principal Website. The non-delivery of goods following the Complainant's test purchase on the Respondent's Website also suggests that the Respondent's Website is being used for a fraudulent purpose.

Panels have held that the use of a domain name for illegal activity, such as impersonation, or other types of fraud, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

Particularly in regards to the three illustrative examples of legitimate interests in paragraph 4(c) of the Policy, the Panel finds that:

- (i) the Respondent has not used the Disputed Domain Name in connection with a bona fide offering of goods and services, as the Panel has ruled that the Respondent's Website is being used for illegal or illegitimate activities;
- (ii) the Disputed Domain Name does not correspond with the Respondent's name (i.e., “朱杰 朱杰 (jie zhu)”), and there is no evidence of the Respondent operating any business or organization with similar name as the Disputed Domain Name; and
- (iii) the Respondent's use of the Disputed Domain Name does not fall within the scope of legitimate noncommercial or fair use, as the Respondent's Website is being used for illegal or illegitimate activities.

The Panel also finds that the Respondent has no rights or legitimate interests to use the Complainant's STREAMLIGHT Trademark.

The Panel finds the second element of the Policy has been established.

### **C. Registered and Used in Bad Faith**

The Panel notes that, for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith.

The Panel finds that the circumstances of registering and using the Disputed Domain Name clearly demonstrate the Respondent's bad faith and have constituted the situation as specified in paragraph 4(b)(iv) of the Policy:

- (a) The Complainant's STREAMLIGHT Trademark has been used at least since 1973 and has been registered since 1988, long before the Respondent's registration of the Disputed Domain Name which is confusingly similar to the Complainant's STREAMLIGHT Trademark, and also similar to its primary domain name <streamlight.com>;
- (b) The Panel finds that the Respondent must have had actual knowledge of the Complainant and the STREAMLIGHT Trademark as well as constructive knowledge, at the very least, of the STREAMLIGHT Trademark at the time of registering the Disputed Domain Name, as (i) the STREAMLIGHT Trademark is registered in China, where the Respondent is located in, (ii) the STREAMLIGHT Trademark is reproduced in its entirety on the Respondent's Website, with identical stylization in some cases, and (iii) the STREAMLIGHT Trademark is known to be connected with the Complainant, as evidenced by the Google search results adduced by the Complainant.
- (c) Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4. Given the extensive use of the STREAMLIGHT Trademark by the Complainant for a long period of time and the non-affiliation between the Complainant and the Respondent, the Panel accepts that the presumption of bad faith is applicable;
- (d) As earlier found in section 6.2 above that the Respondent's Website is being used for illegal or illegitimate activities, bad faith is manifestly apparent. [WIPO Overview 3.0](#), sections 3.1.4 and 3.4; and

(e) There is no reasonable connection or association between the Respondent and the Disputed Domain Name.

Inference of bad faith is also drawn in accordance with paragraph 14(b) of the Rules for the Respondent's failure to file a response as required in paragraph 5(a) of the Rules in the absence of exceptional circumstances.

The Panel finds that the Complainant has established the third element of the Policy.

## **7. Decision**

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the Disputed Domain Name <streamlightdsled.com> be transferred to the Complainant.

*/Andrew Sim/*

**Andrew Sim**

Sole Panelist

Date: December 26, 2025