

ADMINISTRATIVE PANEL DECISION

HNI Technologies, Inc. v. Name Redacted

Case No. D2025-4592

1. The Parties

The Complainant is HNI Technologies, Inc., United States of America (“United States” or “US”), represented by Faegre Drinker Biddle & Reath, United States.

The Respondents are Name Redacted¹, United States.

2. The Domain Names and Registrar

The disputed domain names <hnicorporations.com> and <hnicorporationsinc.com> are registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 5, 2025. On November 6, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On November 6, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint.

The Center sent an email communication to the Complainant on November 10, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amendment to the Complaint on November 12, 2025.

¹ The Respondents appear to have used the name of a third party when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted the Respondents’ name from this Decision. However, the Panel has attached as Annex 1 to this Decision an instruction to the Registrar regarding transfer of the disputed domain name, which includes the name of the Respondents. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in these proceedings, and has indicated Annex 1 to this Decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

The Center verified that the Complaint together with the amendment to 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 of the Complaint, and the proceedings commenced on December 5, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 25, 2025. The Respondent did not submit any response. A third party sent an email to the Center on December 11, 2025, and December 16, 2025, to confirm that The disputed domain names are not part of their domain name portfolio, nor do they have any relationship with the domain name registrant.

The Center appointed Phillip V. Marano as the sole panelist in this matter on January 7, 2026. 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 and its predecessors are furniture manufacturers that were originally founded in 1947. The Complainant offers information about its goods and services on its official “hnicorp.com” website. The Complainant owns valid and subsisting registrations for various HNI-formative trademarks (collectively referred to as the “Complainant’s Trademarks”) in numerous countries, including HNI GLOBAL (Reg. No. 6,267,988) in the US, registered on February 9, 2021, with the earliest priority dating back to November 2019, and HNI CORPORATION (Reg. No. 300707571) in China, registered on August 24, 2006.

The Respondent registered the disputed domain names on April 16, 2025, and May 2, 2025. At the time of this Complaint, the disputed domain names did not resolve to any website content, but were configured with Mail Exchange (“MX”) records.

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 names.

Notably, the Complainant asserts ownership of the Complainant’s Trademarks and has adduced evidence of trademark registration, dated back to August 24, 2006. The disputed domain names are confusingly similar to the Complainant’s HNI CORPORATION trademark, according to the Complainant, because each is entirely composed of the Complainant’s HNI CORPORATION trademark with the addition of the typographical letter “s” and the generic term “inc”.

The Complainant further asserts that the Respondent lacks any rights or legitimate interests in the disputed domain names based on: the lack of any relationship with the Complainant; the lack of any license, permission, or authorization from the Complainant; the lack of any evidence that the Respondent is known by the disputed domain name; the lack of any evidence the Respondent holds any trademark rights in the disputed domain names; the Respondent’s passive holding of the disputed domain names; and the Respondent’s use of the disputed domain names in connection with MX records, implying use for illegal activity, such as email phishing.

The Complainant argues that the Respondent has registered and used the disputed domain names in bad faith for numerous reasons, including: the Complainant's longstanding use and national registration of the Complainant's Trademarks; the Respondent's intentional targeting of the Complainant to mimic the Complainant's official domain name <hnicorp.com> with confusingly similar typographical variations; the Respondent's apparent passive holding of the disputed domain names; the Respondent's use of the disputed domain names in connection with MX records creating the risk of illegal activity, namely impersonation and email phishing; the Respondent's pattern of bad faith domain registrations that target the Complainant; and the Respondent's use of false or fictitious registration data.

B. Respondent

The Respondent did not reply to Complainant's contentions. A third party sent an email to the Center on December 11 and 16, 2025 to confirm that "[t]he disputed domain names are not part of their domain name portfolio, nor do they have any relationship with the domain name registrant".

6. Discussion and Findings

To succeed in its Complaint, the Complainant must establish in accordance with paragraph 4(a) of the Policy:

- i. the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights;
- ii. the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- iii. the disputed domain name has been registered and is being used in bad faith.

Although the Respondent did not reply to the Complainant's contentions, the burden remains with the Complainant to establish by a balance of probabilities, or a preponderance of the evidence, all three elements of paragraph 4(a) of the Policy. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.3 ("A respondent's default would not by itself mean that the complainant is deemed to have prevailed; a respondent's default is not necessarily an admission that the complainant's claims are true ... [UDRP] panels have been prepared to draw certain inferences in light of the particular facts and circumstances of the case e.g., where a particular conclusion is prima facie obvious, where an explanation by the respondent is called for but is not forthcoming, or where no other plausible conclusion is apparent."); *The Vanguard Group, Inc. v. Lorna Kang*, WIPO Case No. [D2002-1064](#) ("The Respondent's default does not automatically result in a decision in favor of the complainant. The Complainant must still prove each of the three elements required by Policy paragraph 4(a)").

Consolidation: Multiple Respondents

The Complaint was filed in relation to different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules. The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder. When a complaint is filed against multiple respondents, panels look at whether (i) the domain names or corresponding websites are subject to common control, and (ii) the consolidation would be fair and equitable to all parties. Panels consider a range of non-exhaustive factors for consolidation, which include (i) the registrants' identity(ies) including pseudonyms, (ii) the registrants' contact information including email address(es), postal address(es), or phone number(s), including any pattern of irregularities, (iii) relevant IP addresses, name servers, or

webhost(s), (iv) the content or layout of websites corresponding to the disputed domain names, (v) the nature of the marks at issue (e.g., where a registrant targets a specific sector), (vi) any naming patterns in the disputed domain names (e.g., <mark-country> or <mark-goods>), (vii) the relevant language/scripts of the disputed domain names particularly where they are the same as the mark(s) at issue, (viii) any changes by the respondent relating to any of the above items following communications regarding the disputed domain name(s), (ix) any evidence of respondent affiliation with respect to the ability to control the disputed domain name(s), (x) any (prior) pattern of similar respondent behavior, or (xi) other arguments made by the complainant and/or disclosures by the respondent(s). [WIPO Overview 3.0](#), section 4.11.2.

Here, the disputed domain names are subject to common control by either the same person or connected parties working in concert with one another, as shown by the following circumstances:

Both appear passively held and do not resolve to website content, but are configured with MX records.

Both were registered through the same Registrar.

Both were registered within relative temporal proximity to each other, between April 16 and May 2, 2025.

Both share the same Proxy Service or pseudonym in their Whois data, namely "Privacy service provided by Withheld for Privacy ehf".

Both target the same Complainant Trademark(s), as defined below, namely HNI CORPORATION.

Both use an identical or similar composition or naming convention, specifically HNI CORPORATION plus an additional typographical letter "s".

Both are written in the same language and script, namely English and ASCII.

Both are configured with the same name servers.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

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 names. [WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition](#), ("WIPO Overview 3.0"), section 1.7.

Ownership of a nationally or regionally registered trademark serves as prima facie evidence that the Complainant has trademark rights for the purposes of standing to file this Complaint. [WIPO Overview 3.0](#), section 1.2.1. The Complainant submitted evidence that the Complainant's Trademarks, including specifically the HNI CORPORATION trademark, have been registered in numerous countries as of August 24, 2006, nearly twenty years before the disputed domain names were registered by the Respondent. Thus, the Panel finds that the Complainant's rights in the Complainants Trademarks have been established pursuant to the first element of the Policy.

The only remaining question under the first element of the Policy is whether the disputed domain names are identical or confusingly similar to the Complainant's Trademarks. In this case, the disputed domain names are confusingly similar to the Complainant's HNI CORPORATION trademark because, disregarding the ".com" generic Top-Level Domain ("gTLD"), the entirety of the mark is reproduced within the disputed domain names. [WIPO Overview 3.0](#), section 1.7. ("This test typically involves a side-by-side comparison of the domain name and the textual components of the relevant trademark to assess whether the mark is recognizable within the domain name ... [I]n cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar [...]"). gTLDs, such as ".com" in the disputed domain names, are generally viewed as a standard registration requirement and are disregarded under the first element. [WIPO Overview 3.0](#), section 1.11.

The confusing similarity is not prevented by combination with the descriptive term “inc”. [WIPO Overview 3.0](#), section 1.8 (Additional terms “whether descriptive, geographic, pejorative, meaningless, or otherwise” do not prevent a finding of confusing similarity where the relevant trademark is recognizable within the disputed domain name); see also *AT&T Corp. v. WorldclassMedia.com*, WIPO Case No. [D2000-0553](#) (“Each of the domain names in dispute comprises a portion identical to [the ATT trademark] in which the Complainant has rights, together with a portion comprising a geographic qualifier, which is insufficient to prevent the composite domain name from being confusingly similar to Complainant’s [ATT trademark]”) *OSRAM GmbH v. Cong Ty Co Phan Dau Tu Xay Dung Va Cong Nghe Viet Nam*, WIPO Case No. [D2017-1583](#) (“[T]he addition of the letters ‘hbg’ to the trademark OSRAM does not prevent a finding of confusing similarity between the Disputed Domain Name and the said trademark.”).

Furthermore, it is well established that domain names which consist of common, obvious or intentional misspellings of trademarks are considered to be confusingly similar for the purposes of the first element of the Policy. WIPO Overview, section 1.9 (“Examples of such typos include (i) adjacent keyboard letters, (ii) substitution of similar-appearing characters ... (iii) the use of different letters that appear similar in different fonts, (iv) the use of non-Latin internationalized or accented characters, (v) the inversion of letters and numbers, or (vi) the addition or interspersing of other terms or numbers”). See e.g. *Edmunds.com, Inc. v. Digi Real Estate Foundation*, WIPO Case No. [D2006-1043](#) (“This is clearly a ‘typosquatting’ case where the disputed domain name is a slight misspelling of a registered trademark to divert internet traffic ... In fact, the domain name comprises the Complainant’s trademark ... with a single misspelling of an element of the mark: a double consonant ‘s’ at the end.”).

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 names. 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 names such as those enumerated in the Policy or otherwise. Where, as in this case, the Respondent fails to come forward with any relevant evidence, the Complainant is deemed to have satisfied the second element of the Policy. [WIPO Overview 3.0](#), section 2.1.

It is evident that the Respondent, redacted by the Panel due to potential identity theft, is not commonly known by the disputed domain names or the Complainant’s Trademarks.

The Panel further finds that the Respondent is neither making a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain names because they do not resolve to an active website. Moreover, absent any evidence to the contrary, the Respondent’s mere configuration of the disputed domain names with MX records for email activity also does constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain names. See e.g. *AdvanSix Resins & Chemicals LLC v. ZOP LLC, elaa zop*, WIPO Case No. [D2022-4072](#) (WIPO, December 28, 2022) (finding no rights or legitimate interests in domain name is parked and associated with active MX servers).

Taking into account the overall circumstances of this case, the Respondent's lack of use of the disputed domain names is a sufficient indication of its lack of rights or legitimate interests.

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

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy proscribes the following non-exhaustive circumstances as evidence of bad faith registration and use of the disputed domain name:

- i. Circumstances indicating that the Respondent has registered or the Respondent has acquired the disputed domain name primarily for the purpose of selling, renting, or otherwise transferring the disputed domain name registration to the Complainant who is the owner of the trademark to a competitor of that Complainant, for valuable consideration in excess of the Respondent's documented out of pocket costs directly related to the disputed domain name; or
- ii. the Respondent has registered the disputed domain name in order to prevent the owner of the trademark from reflecting the mark in a corresponding domain name, provided that the Respondent has engaged in a pattern of such conduct; or
- iii. the Respondent has registered the disputed domain name primarily for the purpose of disrupting the business of a competitor; or
- iv. by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to the Respondent's website or other online location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website or location or of a product or service on the Respondent's website or location.

Passively holding a domain name cannot prevent a finding of bad faith. [WIPO Overview 3.0](#), section 3.3. This includes domain names that do not resolve to any website content as well as domain names that are parked with a "coming soon" message. Where a domain name is being passively held, as alleged in this case, bad faith registration and use exists based upon: (i) the degree of distinctiveness or reputation of the complainant's mark; (ii) the failure of the respondent to submit any response or offer any credible evidence of rights or legitimate interests; (iii) the respondent's concealing its identity or use of false contact details; and (iv) the implausibility of any good faith use which the domain name may be put. See *Id.* See also *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#) ("A remedy can be obtained under the Policy only if those circumstances show that the Respondent's passive holding amounts to acting in bad faith.")

To that end, the Panel acknowledges: the failure of the Respondent to participate in this proceeding; the Respondent's use of a proxy registration service, false registration data, and identity theft; Respondent's registration of typosquatted variations of the Complainant's Trademarks; and the likelihood that the disputed domain names have been configured with MX records in furtherance of impersonation, email phishing, or other illegal activity.

Failure of the Respondent to answer this Complaint or take any part in the present proceedings, in the view of the Panel, is another indication of bad faith on the part of the Respondent. See *Bayerische Motoren Werke AG v. (This Domain is For Sale) Joshuathan Investments, Inc.*, WIPO Case No. [D2002-0787](#).

Where it appears that a respondent employs a proxy service, or purposefully selects a Registrar that applies proxy services by default, merely to avoid being notified of a UDRP proceeding filed against it, UDRP panels tend to find that this supports an inference of bad faith. [WIPO Overview 3.0](#), section 3.6. Use of a proxy registration service to shield a respondent's identity and elude or frustrate enforcement efforts by a legitimate complainant demonstrates bad-faith use and registration of a disputed domain name. See *Fifth Third Bancorp v. Secure Whois Information Service*, WIPO Case No. [D2006-0696](#) (the use of a proxy registration service to avoid disclosing the identity of the real party in interest is also consistent with an inference of bad faith when combined with other evidence of evasive, illegal, or irresponsible conduct).

Prior WIPO panel determinations agree, the use of false registration data in connection with a disputed domain name further supports a finding of bad faith registration and use. See e.g. *Action Instruments, Inc. v. Technology Associates*, WIPO Case No. [D2003-0024](#) (Providing false contact information violates paragraph 2 of the Policy, which requires a registrant to represent that the statements it “made in [its] Registration Agreement are complete and accurate. “Maintaining that false contact information in the WHOIS records (which can easily be updated at any time) after registration constitutes bad faith use of the domain name because it prevents a putative complainant from identifying the registrant and investigating the legitimacy of the registration.”); *Royal Bank of Scotland Group v. Stealth Commerce*, WIPO Case No. [D2002-0155](#); *Home Director, Inc. v. HomeDirector*, WIPO Case No. [D2000-0111](#) (April 11, 2000).

The Respondent also evidently registered the disputed domain names using the identity and contact information of third parties, who had no actual connection to the disputed domain names. The use of false registration data in connection with the disputed domain names (and in this case, broader identity theft) further supports a finding of bad faith registration and use. See, e.g., *Action Instruments, Inc v. Technology Associates*, WIPO Case No. [D2003-0024](#).

The act of “typosquatting” or registering a domain name that is a common misspelling of a mark in which a party has rights has often been recognized as evidence of bad faith registration per se. WIPO Overview, section 3.2.1 (“Particular circumstances UDRP panels take into account in assessing whether the respondent’s registration of a domain name is in bad faith include: (i) the nature of the domain name (e.g., a typo of a widely known mark ...”). See also *Paragon Gifts, Inc. v. Domain.Contact*, WIPO Case No. [D2004-0107](#) (citing *National Association of Professional Baseball Leagues, d/b/a Minor League Baseball v. Zuccarini*, WIPO Case No. [D2002-1011](#)); *ESPN, Inc. v. XC2*, WIPO Case No. [D2005-0444](#) (finding that the practice of “typosquatting”, of itself, is evidence of the bad faith registration of a domain name).

Finally, the Panel considers configuration of an email server on the disputed domain names as additional evidence that the disputed domain names have been registered and used in bad faith. The disputed domain names contain in their entirety Complainant’s HNI CORPORATION trademark, and the record is devoid of any evidence to suggest that the Respondent has any legitimate interest in sending emails from the disputed domain names. Conversely, configuration of an email server creates a risk that the Respondent is engaged in a phishing scheme, thereby using an email address associated with the Complainant to try to steal valuable sensitive, financial or other confidential information from the Complainant’s clients or employees. Prior WIPO panel determinations have recognized the same risk, and considered it as additional evidence of bad faith. See e.g. *Accor SA v. Domain Admin, C/O ID#10760, Privacy Protection Service INC d/b/a PrivacyProtect.org / Yogesh Bhardwaj*, WIPO Case No. [D2017-1225](#); *Carrefour S.A. v. WhoisGuard, Inc / Gaudet Jose*, WIPO Case No. [DCO2018-0041](#) (“The Panel concurs with the Complainant that the connection of the disputed domain name with an email server configuration enhances a likelihood of confusion and presents a risk that the Respondent is engaged in a phishing scheme.”).

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

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 names <hnicorporations.com> and <hnicorporationsinc.com> be transferred to the Complainant.

/Phillip V. Marano/

Phillip V. Marano

Sole Panelist

Date: January 27, 2026