

ADMINISTRATIVE PANEL DECISION

HNI Technologies, Inc. v. lisa risalvato

Case No. D2025-4718

1. The Parties

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

The Respondent is lisa risalvato, United States.

2. The Domain Name and Registrar

The Disputed Domain Name <hnicorp-us.com> is registered with Hostinger Operations, UAB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 13, 2025. On November 14, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On November 17, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 18, 2025, providing the registrants and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on November 21, 2025.

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 of the Complaint, and the proceedings commenced on November 25, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 15, 2025.¹ The Respondent did not file any response. The Center notified the commencement of panel appointment process on December 30, 2025.

The Center appointed Peter J. Dernbach 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 is a corporation organized and existing under the laws of the state of Iowa, United States. The Complainant provides furniture, including workplace furnishings, and residential building products, such as fireplaces.

The Complainant is the owner of HNI, HNI CORP, and other marks incorporating the HNI mark (together "HNI Marks") in many jurisdictions, including:

- European Union trademark HNI, registration number 006441836, registered since October 23, 2008;
- China trademark HNI, registration number 5570285, registered since September 7, 2009;
- China trademark HNI CORP, registration number 5570289, registered since September 7, 2009;
- Hong Kong, China trademark HNI CORP., registration number 300707553, registered since August 24, 2006;
- India trademark HNI CORP., registration number 1513089, registered since December 13, 2006.

The Complainant uses the domain name <hnicorp.com>.

The Disputed Domain Name <hnicorp-us.com> was registered on May 28, 2025. The Disputed Domain Name does not resolve to any active website.

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. The Complainant's submissions may be summarized as follows:

- (i) The Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights.

The Complainant is the owner of the HNI Marks. The Complainant's rights in the HNI Marks pre-date the Respondent's registration date for the Disputed Domain Name. The Complainant argues that the Disputed

¹ The Complaint was filed as regards the domain names <hnicorp-us.com> and <hnicorps.com>. The proceeding was suspended on December 3, 2025, per the Complainant's request. The Complainant reached a settlement with the registrant of the domain name <hnicorps.com>. The Center reinstated the proceeding on December 17, 2025, and the due date for the Response was extended to December 29, 2025.

Domain Name is confusingly similar to its HNI Marks because the Disputed Domain Name consists of the HNI CORP trademark in its entirety and the geographic term “-us”. The addition of the geographic term “-us” does not prevent a finding of confusing similarity. Rather, such addition enhances confusion because Internet users seeking the Complainant’s US-focused website will potentially assume that the Disputed Domain Name is Complainant’s website for advertising its products and services in the United States.

(ii) The Respondent has no rights or legitimate interests in respect of the Disputed Domain Name

The Complainant argues that the Respondent is not using the Disputed Domain Name in connection with the bona fide offering of goods and services nor making a legitimate noncommercial or fair use of the Disputed Domain Name. Instead, the Disputed Domain Name resolves to an inactive website. There is no evidence showing that the Respondent has become commonly known by the term “hnicorp-us.” Also, the Complainant has not given the Respondent any permission, authorization, consent or license to use its HNI Marks, nor has Respondent requested such permission.

(iii) The Disputed Domain Name was registered and is being used in bad faith.

The Complainant has used the HNI marks in the United States since 2004 and holds rights in the HNI Marks in many jurisdictions. The Complainant has extensively marketed its goods and services in the United States and other jurisdictions around the world. The Complainant argues that the registration of a domain name that includes the complainant’s trademark and a geographic term suggests the respondent’s actual knowledge of complainant’s rights and the respondent’s effort to opportunistically capitalize on the registration and use of the domain name.

In addition, the Complainant argues that passive holding of a domain name is indicative of bad faith. The Complainant also argues that the Respondent has provided false or misleading contact information on the Registrar, which further evidences that the Disputed Domain Name was registered and used in bad faith.

B. Respondent

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

6. Discussion and Findings

In accordance with paragraph 4(a) of the Policy, in order to succeed in this administrative proceeding and obtain the requested remedy (in this case, transfer of the Disputed Domain Name), the Complainant must prove that each of the three following elements are present:

- (i) the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (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.

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

The Complainant has established that it is the owner of trademark rights in the HNI Marks. The Disputed Domain Name is a combination of the Complainant's HNI CORP trademark in its entirety, "-us" and the generic Top-Level Domain ("gTLD") ".com". The Panel finds that the Disputed Domain Name incorporates the entirety of the Complainant's HNI and HNI CORP trademark. The addition of the geographical term "-us" after does not prevent a finding of confusing similarity between the Disputed Domain Name and the Complainant's HNI CORP trademark. In addition, as found in past UDRP decisions, gTLDs may generally be disregarded when evaluating the identity or confusing similarity between the disputed domain name and the complainant's trademark.

Therefore, 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.

The Complainant states that it has neither licensed nor authorized the Respondent to use the Complainant's HNI or HNI CORP marks in the Disputed Domain Name. According to the information provided by the Registrar, the Respondent's name, lisa risalvato, does not appear to be related to the Disputed Domain Name. Also, there is no evidence suggesting that the Disputed Domain Name is being used in connection with a bona fide offering of goods or services, or a legitimate noncommercial or fair use.

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.

Therefore, 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.

In the present case, the Complainant's HNI Marks have been registered in many jurisdictions before the Respondent's registration of the Disputed Domain Name. The Disputed Domain Name is confusingly similar to the Complainant's HNI Marks and contains the Complainant's HNI CORP trademark in its entirety. The selection of the Disputed Domain Name points to the Respondent's knowledge of the Complainant and its marks. The Panel therefore finds that the Disputed Domain Name was registered in bad faith.

In addition, the Disputed Domain Name currently resolves to an inactive website. Passive holding of a domain name does not preclude a determination of use in bad faith under the passive holding doctrine. [WIPO Overview 3.0](#), section 3.3. Considering the composition of the Disputed Domain Name, the reputation

of the Complainant's Marks, and the Respondent's failure to file a Response, the Panel finds the passive holding of the Disputed Domain Name does not prevent a finding of bad faith under the circumstances of the case. The Panel therefore finds that the Disputed Domain Name has been registered and used in bad faith.

Therefore, 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 <hnicorp-us.com> be transferred to the Complainant.

/Peter J. Dernbach/

Peter J. Dernbach

Sole Panelist

Date: January 20, 2026