# ADMINISTRATIVE PANEL DECISION

Haleon UK IP Limited v. userdc dger, niu youguo
Case No. D2025-4725

## 1. The Parties

The Complainant is Haleon UK IP Limited, United Kingdom, represented by Safenames Ltd, United Kingdom.

The Respondents are userdc dger and niu youguo, United States of America.

## 2. The Domain Names and Registrar

The disputed domain names <haleonhome.shop> and <haleonusa.shop> are registered with Spaceship, Inc. (the "Registrar").

## 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on November 14, 2025. On November 14, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On November 14, 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 (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 18, 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 amended Complaint on November 20, 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 Respondents 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. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on December 16, 2025.

The Center appointed Peter Burgstaller as the sole panelist in this matter on December 23, 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 global leader in the consumer healthcare market (Annexes 4 - 9 to the Complaint). It owns several trademark registrations consisting of the mark HALEON, inter alia

- International Trademark Registration (word), Reg. No. 1674572, registered on November 29, 2021, designating several jurisdictions around the world;

- United Kingdom Trademark Registration (word), Reg. No. UK00003726732, registered on March 11, 2022; and

- United States of America Trademark Registration (word), Reg. No. 7617430, registered on December 24, 2024 (Annexes 11 and 15 to the Complaint).

The Complainant's main business website is available under the domain name <haleon.com>; it further has online presence under the social media platforms LinkedIn, Facebook, X and Instagram (Annex 12 to the Complaint).

The disputed domain names were registered on July 17, 2025 for <haleonusa.shop> and on August 8, 2025 for <haleonhome.shop> (Annex 1 to the Complaint). The disputed domain names originally resolved to online stores featuring products and product logos of the Complainant and offered these products for sale under the logo HALEON (Annex 13 to the Complaint); there were no disclaimers on these online stores clarifying that the shops are not controlled or authorized by the Complainant.

At least since November 25, 2025 the disputed domain names resolved to inactive websites (Annex 14 to the Complaint).

The Complainant sent a cease-and-desist letter to the Respondents on September 24, 2025 (Annex 17 to the Complaint); the Respondents did not reply.

## 5. Parties' Contentions

### A. Complainant

The Complainant asks for the consolidation of disputes against different disputed domain names' registrants in a single proceeding since there is a set of indicators that suggest that the disputed domain names were registered by the same entity.

Further, 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 contends that it holds multiple registered trademarks for the term HALEON. The Complainant also highlights the extensive media recognition it has attained under the HALEON brand and highlights the goodwill and recognition that has been attained under the HALEON name, which is a distinctive identifier associated with the Complainant's goods and services. The disputed domain names include the entirety of the HALEON mark with the addition of the dictionary term “home” and the geographical indicator “USA” (for the “United States of America”). Where a domain name incorporates the entirety of a complainant’s trademark, this will be sufficient to establish identical or confusing similarity.

The Complainant submits that the Respondents lack rights or legitimate interests in the disputed domain names. The Respondents do not have any trademark rights to the term HALEON. There is also no evidence that the Respondents retain any unregistered trademark rights to the terms HALEON or any terms used in the disputed domain names or is commonly known by the term HALEON. The Respondents have not received any license from the Complainant to use domain names featuring the HALEON trademark. The Complainant submits that the Respondents have not used, nor prepared to use, the disputed domain names in connection with a bona fide offering of goods or services. The disputed domain names have, at some point during their registrations, resolve(d) to sites that impersonate(d) the Complainant’s offerings, using the Complainant’s HALEON trademark and its copyrighted material taken from the Complainant’s HALEON platform. The Complainant affirms that no authority has been given to the Respondents to advertise HALEON products for sale. There is no disclaimer clarifying the lack of affiliation with the Complainant. Hence, it is clear that the Respondents intended to cause confusion in the minds of online users through the use of the distinctive HALEON name.

Finally, the Complainant alleges that the disputed domain names were registered and are being used in bad faith: The Complainant’s HALEON trademark registrations precede the creation date of the disputed domain names and the HALEON mark is distinctive and well known.

The disputed domain names are also being used in bad faith: The Respondents have intentionally attempted to attract, for commercial gain, online users by creating a likelihood of confusion with the Complainant’s HALEON mark and offerings. The use of the disputed domain names to host online stores under the HALEON trademark, and featuring the Complainant’s products, gives Internet users a false impression that the sites are controlled or authorized by the Complainant. Moreover, the Respondents set up prompts such as ‘contact us’, ‘login’, and ‘checkout’ using the HALEON mark for Internet users to input their sensitive information. Additionally, the Respondents failed to present a clear disclaimer on the disputed domain names’ websites to disassociate the Complainant’s services from the services purportedly offered from the disputed domain names; a cease-and-desist-letter remained unanswered.

**B. Respondents**

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

## 6. Discussion and Findings

### 6.1 Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally 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.

In addressing the Complainant’s request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“WIPO Overview 3.0”), section 4.11.2.

As regards common control, the Panel notes that:

- the disputed domain names were registered using the same Registrar;
- the registrant details contain several commonalities in the physical addresses and the registrant email addresses for both disputed domain names are similar, both using the "[…]@angegg.com" email domain;
- the disputed domain names have a very similar naming pattern:  the HALEON trademark with a descriptive suffix ("home" and "usa") and the identical generic Top-Level Domain ("gTLD") ".shop";
- the disputed domain names resolved (originally) to similar websites, purporting to offer unauthorized products of the Complainant for sale under the logo HALEON;  and
- the Respondents did not react in any way – the Respondents neither submitted comments on the consolidation request nor filed any Response.

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.

**6.2 Substantive Issues:**

According to paragraph 4(a) of the Policy, the Complainant must prove that:

(i) the disputed domain names are 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 with respect to the disputed domain names;  and
(iii) the disputed domain names have been registered and are 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 3.0, section 1.7.

The Complainant submitted evidence which incontestably and conclusively establishes rights in the mark HALEON.

In the present case, the disputed domain names are confusingly similar to the HALEON mark in which the Complainant has rights since that mark remains recognizable within the disputed domain names.  While both disputed domain names add descriptive terms to the HALEON mark, it has long been established under UDRP decisions that adding descriptive terms to a trademark, here, the mere addition of the term "home" and "usa", does not prevent a finding of confusing similarity under the first element of the Policy, if the relevant trademark remains recognizable within the disputed domain name.  WIPO Overview 3.0, section 1.8.

Finally, it has also long been held that gTLDs are generally disregarded when evaluating the confusing similarity between a disputed domain name and a trademark.  WIPO Overview 3.0, section 1.11.1.

Based on the available record, 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.

While 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 often impossible 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. 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 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, since it has never assigned, granted, licensed, sold, transferred or in any way authorized the Respondent to register or use the HALEON trademark in any manner. The Respondent did not reply and hence has not rebutted the Complainant's contentions.

Further, the Complainant focuses on the fact that its trademark is well known and registered in a variety of jurisdictions around the world. The Complainant provided suitable evidence of its reputation, adding that it is inconceivable that the Respondent would not have been aware of this when registering the disputed domain names.

Moreover, the composition of the disputed domain names, coupled with the use of the disputed domain names to (at least previously) resolve to websites that purported to offer for sale unauthorized products of the Complainant, while displaying the Complainant's product logos and the HALEON logo, affirms the Respondent's intention of taking unfair advantage of the likelihood of confusion between the disputed domain names and the Complainant as to the origin or affiliation of the websites at the disputed domain names.

Finally, the evidence in the Complaint revealed no disclaimer at the website accessible through the disputed domain names that disclosed the lack of the Respondent's relationship with the Complainant. Rather, it appears the Respondent has purposely attempted to take unfair advantage of the Complainant's mark and the purported connection with the Complainant. WIPO Overview 3.0, section 2.8; and *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. D2001-0903.

Based on the available record, the Panel finds the second element of the Policy has been established.

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

As stated in many decisions rendered under the Policy (e.g. *Robert Ellenbogen v. Mike Pearson*, WIPO Case No. D2000-0001) both conditions, registration and use in bad faith, must be demonstrated; consequently, the Complainant must show that:

- the disputed domain names were registered by the Respondent in bad faith, and
- the disputed domain names are being used by the Respondent in bad faith.

(i) In the present case, the Complainant provided evidence which demonstrates that it has rights and is the owner of the distinctive and well-known registered trademark HALEON, registered and used in many jurisdictions around the world before the disputed domains were registered.

Further, the Complainant registered and is using the domain name <haleon.com> for its main business website. Moreover, the Complainant has also a strong Internet presence on various social media platforms.

It is therefore inconceivable for this Panel that the Respondent registered and used the disputed domain names without knowledge of the Complainant's rights, which leads to the necessary inference of bad faith. WIPO Overview 3.0, section 3.2.2.

This finding is supported by the fact that the disputed domain names incorporate the Complainant's trademark HALEON entirely and merely add the descriptive terms "home" and "usa".

Therefore, the Panel is convinced that the disputed domain names were registered in bad faith by the Respondent.

(ii) The Complainant has put forward evidence that the disputed domain names were previously used by the Respondent to resolve to websites featuring the Complainant's mark HALEON and products and purported to offer for sale these products, giving Internet users the impression that the sites are controlled or at least authorized by the Complainant, which is not the case. This clearly disrupts the Complainant's business and shows that the Respondent intentionally attempts to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark, which constitutes bad faith use.

Although, that at least since September 25, 2025, the disputed domain names did not resolve to a website with material content, panels have also found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. WIPO Overview 3.0, section 3.3.

The evidence and documents produced and put forward by the Complainant together with the fact that the Respondent did not reply to a cease-and-desist letter from the Complainant, has failed to file a Response and therefore failed to present any evidence of any good faith registration and use with regard to the disputed domain names further prove that the disputed domain names were registered and are used by the Respondent in bad faith under paragraph 4(a)(iii) of the Policy.

Based on the available record, 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 names <haleonhome.shop> and <haleonusa.shop> be transferred to the Complainant.

*/Peter Burgstaller/*
**Peter Burgstaller**
Sole Panelist
Date: January 6, 2026