

ADMINISTRATIVE PANEL DECISION

Traction Technologies Inc. v. Nick Haase

Case No. D2025-4731

1. The Parties

The Complainant is Traction Technologies Inc., United States of America ("United States"), represented by Igor Vinicius Alvarenga Marinelli, United States.

The Respondent is Nick Haase, United States.

2. The Domain Name and Registrar

The disputed domain name <tractlan.com> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on November 14, 2025. On November 17, 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 (Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 18, 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 amendment to the Complaint on November 21, 2025.

The Center verified that the Complaint together with the amendment to the 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 28, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 18, 2025. The Respondent sent a first email communication to the Center on December 2, 2025. The Response was filed with the Center on December 18, 2025. On December 18, 2025, the Complainant provided a Supplemental Filing.

The Center appointed William F. Hamilton 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 operates in the industrial maintenance and asset monitoring business.

The Complainant owns multiple trademark registrations for TRACTIAN (the “Mark”), including the following:

- United States trademark registration No. 6,771,363, filed on April 27, 2021, registered on June 28, 2022, in International Classes 9 and 42;
- Brazil trademark registration No. 926606000, filed on May 11, 2022, registered on July 25, 2023, in International Class 42;
- Brazil trademark registration No. 929328027, filed on January 31, 2023, registered on July 9, 2024, in International Class 9; and
- Mexico trademark registration No. 2456961, filed on June 2, 2022, registered on October 4, 2022, in International Class 16.

These registrations were all in force prior to the registration of the disputed domain name on October 19, 2025.

The Complainant’s principal website is “www.traction.com”.

The disputed domain name was registered on October 19, 2025.

The disputed domain name redirects to the website “www.maintainx.com”, which offers software products and services in the same industrial maintenance market as the Complainant. The Respondent is associated with the company MaintainX.

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.

Notably, the Complainant contends that the disputed domain name is confusingly similar to its TRACTIAN trademark, differing only by substitution of the letter “i” with the letter “l”, a change that is visually minimal and likely to result in user confusion. The Complainant asserts that the Respondent has no rights or legitimate interests in the disputed domain name, and there is no evidence indicating that the Respondent is commonly known by that name. Additionally, the Complainant states that the Respondent is neither a licensee nor affiliated with the Complainant in any way. Furthermore, the Complainant claims it has not authorized the Respondent to use the Mark. Moreover, the Complainant argues that the disputed domain name was registered and is used in bad faith for commercial gain, misleading Internet users into believing that the disputed domain name resolves to a website that the Complainant endorses, is connected to, or sponsors.

B. Respondent

The Respondent consents to the transfer of the disputed domain name to the Complainant.

However, the Respondent requests that the Panel refrain from making a finding of bad faith, asserting that:

- The Respondent did not register or use the disputed domain name with the intention of targeting the Complainant or the Mark;
- The Respondent did not attempt to sell the disputed domain name for profit; and
- Upon becoming aware of the Complainant's concerns, the Respondent promptly offered to transfer the disputed domain name without compensation.

The Respondent further requests the Panel to take note of the Respondent's post-filing conduct and refrain from a finding of bad faith.

6. Procedural Ruling: Supplemental Filing

The Panel accepts the Complainant's Supplemental Filing. The Supplement Filing is limited to new issues raised in the Response, and the acceptance of the Supplement will not prejudice the Respondent.

7. Discussion and Findings

Paragraph 4(a) of the Policy lists three elements that a complainant must satisfy to succeed. The Complainant must demonstrate that:

- (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 such 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 demonstrated rights in the TRACTIAN trademark through multiple registered trademarks. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. The disputed domain name differs from the Complainant's trademark only by replacing the letter "i" with the letter "l". In lowercase form, these letters are nearly visually indistinguishable, and the Panel notes that the "i" and "l" keys are in close physical proximity on a standard QWERTY keyboard.

This minor alteration of the "i" in the Mark to an "l" in the disputed domain name does not prevent recognition of the Complainant's trademark within the disputed domain name and constitutes a classic form of typosquatting. [WIPO Overview 3.0](#), section 1.9.

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.

Here, the disputed domain name redirects Internet users to a third-party commercial website offering competing services. Such use does not confer rights or legitimate interests. [WIPO Overview 3.0](#), section 2.5.3.

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:

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

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent’s registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

The Respondent has engaged in a deliberate misspelling of a distinctive trademark; has automatically redirected the disputed domain name to a competing commercial website; and has provided no independent or credible explanation for the selection of the disputed domain name. The intentional targeting of the Complainant is apparent.

The Respondent's use of the disputed domain name to redirect Internet users to a third-party website offering competing services constitutes bad faith under paragraph 4(b)(iv) of the Policy, as it intentionally seeks to attract users for commercial gain by creating a likelihood of confusion with the Complainant's Mark. [WIPO Overview 3.0](#), section 3.1.4.

The Panel acknowledges the Respondent's consent to transfer after the filing of the Complainant and request to refrain from a finding of bad faith. The Panel, however, determines that issuing this decision is appropriate based on the facts of this case and the Complainant's request for a decision. [WIPO Overview 3.0](#), section 4.10.

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

8. 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 <tractlan.com> be transferred to the Complainant.

/William F. Hamilton/

William F. Hamilton

Sole Panelist

Date: January 11, 2026