

## **ADMINISTRATIVE PANEL DECISION**

Adtech Holding Ltd v. zhencai luo, hai wang  
Case No. D2025-4970

### **1. The Parties**

The Complainant is Adtech Holding Ltd, Cyprus, represented by Stepan Korostelv, Cyprus.

The Respondents are zhencai luo, Hong Kong, China; hai wang, Hong Kong, China.

### **2. The Domain Names and Registrar**

The disputed domain names <propelleradsdata.com>, <propelleradshex.com>, and <propelleradsppc.com> (the “Disputed Domain Names”) are registered with Aceville Pte. Ltd. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on November 28, 2025. On November 28, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On December 1, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrants and contact information for the Disputed Domain Names 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 December 9, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) 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 in English on December 12, 2025.

On December 9, 2025, the Center informed the Parties in Chinese and English, that, according to the Registrar, the language of the Registration Agreement for the Disputed Domain Names is Chinese. On December 12, 2025, the Complainant requested English to be the language of the proceeding. The Respondents did not submit any comment on the Complainant’s submission.

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 Respondents in English and Chinese of the Complaint, and the proceedings commenced on December 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 1, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on January 5, 2026.

The Center appointed Andrew Sim as the sole panelist in this matter on January 13, 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 limited liability company registered in accordance with the laws of Cyprus in 2016. It is a central holding company in the group of companies (the "Group") involved in the operation of the "PropellerAds Advertising Platform" (the "Platform"), an online advertising platform located at the domain name <propellerads.com> that helps advertisers and publishers to distribute advertising materials and monetize online-traffic. Since the creation of the domain name <propellerads.com> in 2011, the "PropellerAds" brand has been used by members of the Group, including the Complainant and those companies under its control. The Complainant claimed that the Platform is well-known internationally in the online advertising ecosystem.

The Complainant holds registered trademarks for/containing PropellerAds (the "Complainant's Trademarks") that are being utilized by the Complainant with respect to the Platform, including:

Jurisdiction	Mark	Registration Number	Registration Date	Class Covered	Status
European Union (all member states)		018908650	November 14, 2023	9, 35, 38, and 42	Registered
	PROPELLERADS  (the "PROPELLERADS Trademark")	018908500	November 15, 2023	9, 35, 38, and 42	Registered

The Panel notes that the above registrations do not cover Hong Kong, China, where the Respondents are located in.

The Panel also notes that the Complainant's Trademarks are displayed prominently in various parts of the Platform, including within its header.

For illustration purposes, the Panel sets out below a brief chronology of events, covering the registrations of each of the Disputed Domain Names and the abuse reports filed by the Complainant:

Date	Event
August 5, 2025	<propelleradsppc.com> was registered by zhencai luo.
August 9, 2025	<propelleradsdata.com> was registered by zhencai luo.
August 2025	The Complainant filed the first abuse report with the hosting provider in respect of <propelleradsppc.com> and <propelleradsdata.com> ("Initial Domain Names").
Between August 2025 and October 16, 2025	The hosting provider resolved to satisfy the first abuse report and to impose a "ClientHold" status on the Initial Domain Names.
October 16, 2025	<propelleradshex.com> was registered by hai wang.
After October 16, 2025	The Complainant filed the second abuse report with the hosting provider in respect of <propelleradshex.com>.

October 24, 2025	The hosting provider imposed a "ClientHold" status on <propelleradshex.com>.
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Based on the Complainant's evidence, the websites previously resolving from Disputed Domain Names (the "Respondents' Websites") were identical in appearance and content. All of the Respondents' Websites prominently displayed the Complainant's Trademarks and a login form. The Complainant also provided screenshots of alleged correspondences between the Respondent(s) and a client of the Complainant, in which the Respondent(s) impersonated the Complainant to recruit employees ("Impersonation Correspondence"). Upon the Panel's own visit to each of the Disputed Domain Names, the Respondents' Websites are no longer accessible, likely caused by the Registrar's decision to place the Disputed Domain Names on lock.

Little information is known about each of the Respondents. Available information provided by the Registrar covers only the registrants' names, postal addresses and email addresses.

## 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.

First, the Complainant contends that each of the Disputed Domain Names is confusingly similar to the Complainant's Trademarks. It argues that each of them incorporates the PROPELLERADS Trademark in its entirety at the first and dominant position, thereby exploiting the recognition and goodwill associated with the PROPELLERADS Trademark. The addition of short descriptive or meaningless terms, i.e., "data", "ppc" and "hex", in the Disputed Domain Names does not avert confusing similarity. The Complainant contends that the Respondents' Websites' visual and textual presentation (including the use of the Complainant's Trademarks and the alleged fake login form) created a direct and immediate association with the Complainant, which reinforces the argument of confusing similarity.

Second, the Complainant contends that the Respondents lack rights or legitimate interests in the Disputed Domain Names. This is based on that:

- (a) The Complainant has not licensed, authorized, or otherwise permitted the Respondents to register or use the PROPELLERADS Trademark, or any variations thereof, in the Disputed Domain Names;
- (b) The Complainant filed two abuse reports with the hosting provider, who sided with the Complainant in both cases;
- (c) There is no evidence that the Respondents are commonly known by any name incorporating "PropellerAds" or the Disputed Domain Names; and
- (d) The Disputed Domain Names have been used to host fraudulent recruitment schemes, fake login portals and pages impersonating PropellerAds recruiters.

Third, the Complainant contends that the Disputed Domain Names were registered and are being used in bad faith. The Complainant claims that the Respondents deliberately targeted the Complainant's PROPELLERADS Trademark. It also claimed that the Disputed Domain Names were used to attract Internet users by creating a likelihood of confusion as to source, affiliation or endorsement, and to facilitate fraud. Examples include the use of the Complainant's Trademarks in the Respondents' Websites and the recruitment scam as evidenced by the Impersonation Correspondence. These conducts tarnishes the Complainant's reputation, which supports a finding of bad faith. It is argued that the Respondents clearly had knowledge of the Complainant at registration and intentionally abused the PROPELLERADS Trademark, given (1) the Platform has been in operation since 2011 and is well-known, (2) the impersonation of the

Complainant, (3) the sequence of the registration of the Disputed Domain Names and the abuse reports filed by the Complainant as described in section 4 above.

## **B. Respondents**

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

## **6. Discussion and Findings**

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

According to the Registrar, the language of the Registration Agreement for the Disputed Domain Names 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 language of the Registration Agreement is English;
- (b) English is widely accepted as the standard language for UDRP proceedings;
- (c) Requiring the Panel and the Complainant to conduct the proceeding in Chinese would create unreasonable procedural obstacles; and
- (d) Selecting Chinese as the language of the proceeding will serve to favour the Respondents' illegal interests.

The Respondents did not make any 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 Respondents 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 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 3.0](#), section 4.11.2.

As regards common control, the Panel notes that (1) the Respondents' Websites were identical in appearance and content, (2) the naming patterns of the Disputed Domain Names were similar, and (3) the Respondent hai wang only registered the Disputed Domain Name <propelleradshex.com> shortly after the Initial Domain Names were placed in "ClientHold" status. These factors strongly suggest that the Respondents were coordinated and acted under a common control.

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.

### **6.3 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 Names are 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 Names; and
- (c) the Disputed Domain Names have 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 Names.

#### **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 3.0](#), section 1.7.

As the Panel has already noted in section 4 above, the registrations of the Complainant's Trademarks do not cover Hong Kong, China, where the Respondent is located in. However, given the global nature of the Internet and Domain Name System, the Panel does not consider the lack of registration or designation in China is relevant to the assessment under this first element. [WIPO Overview 3.0](#), section 1.1.2. Given the 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 Panel finds the PROPELLERADS Trademark is recognizable within the Disputed Domain Names. Although the addition of other terms here, "data", "ppc" and "hex", 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 Names and the PROPELLERADS Trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 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 Names are confusingly similar to the Complainant's PROPELLERADS 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 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.

From the overall appearance of the Respondent’ Websites as described in section 4 above, the Panel finds that the Respondent’ Websites are being used for illegal or illegitimate activities as they are clearly an illegal imitation of the Complainant’s Platform. The Impersonation Correspondence is another example of illegal impersonation or even recruitment scam. 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 Names in connection with a bona fide offering of goods and services, as the Panel has ruled that the Respondent’ Websites are being used for illegal or illegitimate activities;
- (ii) the Disputed Domain Names do not correspond with the Respondent’s names (i.e., “zhencai luo” and “hai wang”), and there is no evidence of the Respondent operating any business or organization with similar name as the Disputed Domain Names; and
- (iii) the Respondent’s use of the Disputed Domain Names does not fall within the scope of legitimate noncommercial or fair use, as the Respondent’ Websites are 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 PROPELLERADS 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 Names 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 "PropellerAds" brand has been used since 2011 and has been registered since 2023, both before the Respondent's registrations of the Disputed Domain Names which are confusingly similar to the Complainant's PROPELLERADS Trademark, and also similar to its primary domain name <propellerads.com>;

(b) The Panel finds that the Respondent must have had actual knowledge of the Complainant and the Complainant's Trademarks (including the PROPELLERADS Trademark) as well as constructive knowledge, at the very least, of the PROPELLERADS Trademark at the time of registering the Disputed Domain Name, as (i) the Complainant's Trademarks are reproduced in their entirety on the Respondent' Websites, with identical stylization in some cases, (ii) the Respondent illegally impersonated the Complainant, as evidenced by the Impersonation Correspondence, and (iii) the Respondent must have been aware of the abuse report filed by the Complainant before the registration of <propelleradshex.com>.

(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 reputation of the Platform and the "PropellerAds" brand, added to 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 6.3 above that the Respondent' Websites are 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 Names.

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 Names <propelleradsdata.com>, <propelleradshex.com>, and <propelleradspc.com> be transferred to the Complainant.

*/Andrew Sim/*

**Andrew Sim**

Sole Panelist

Date: January 27, 2026