

ADMINISTRATIVE PANEL DECISION

QLF Brands B.V. v. Swackhamer Jason

Case No. D2026-0104

1. The Parties

The Complainant is QLF Brands B.V., Netherlands (Kingdom of the), represented by Taylor Wessing LLP, Netherlands (Kingdom of the).

The Respondent is Swackhamer Jason, United States of America.

2. The Domain Name and Registrar

The disputed domain name <lamp-enlicht.com> is registered with West263 International Limited (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on January 12, 2026. On January 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 13, 2026, 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 (West263 International Limited) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 16, 2026, 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 amended Complaint on January 20, 2026.

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 January 21, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 10, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on February 11, 2026.

The Center appointed Adam Taylor as the sole panelist in this matter on February 18, 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's group produces and sells light fittings for interior design.

The Complainant has an average of 4.4 out of 5 from 8,910 reviews on Trustpilot.

The Complainant owns Benelux trade mark No. 1353279 for LAMPENLICHT.NL, registered on May 18, 2017, in classes 35 and 39.

The Complainant's group operates a Dutch-language website at "www.lampenlicht.nl".

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

As of January 5, 2026, the disputed domain name resolved to a Dutch-language website branded "LAMP EN LICHT" that purported to offer lighting products for sale. The name of the entity operating the website was not disclosed.

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 Respondent is operating a fake web shop offering products for sale that will probably never be shipped and/or is impersonating the Complainant.

B. Respondent

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

6. Discussion and Findings

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 trade mark and the disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 1.7.

The Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds that a dominant feature of the mark, namely "lampenlicht", is recognisable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), 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 recognised that proving that 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 3.1](#), 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.

As to paragraph 4(c)(i) of the Policy, and as further discussed in section 6C below, the Panel considers that the Respondent has used the disputed domain name to intentionally attempt to attract, confuse and profit from Internet users seeking the Complainant’s goods and/or services. Such use of the disputed domain name is not bona fide.

Nor is there any evidence that paragraphs 4(c)(ii) or (iii) of the Policy are relevant in the circumstances of this case.

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 Panel considers that the Respondent has intentionally attempted to attract Internet users to its website for commercial gain by creating a likelihood of confusion with the Complainant’s trade mark in accordance with paragraph 4(b)(iv) of the Policy.

First, the Complainant has established a substantial reputation based, amongst other things, on the vast number of Trustpilot reviews.

Furthermore, the disputed domain name reflects the Complainant’s mark in its entirety with the mere addition of a hyphen.

The Panel acknowledges that the mark comprises three words (“lamp and light” as translated in English), which at least raises the question as to whether the Respondent is making a bona fide use of this phrase (e.g., in accordance with the dictionary meaning of its component terms), rather than to trade off the Complainant’s trade mark.

However, the Panel notes that the Respondent has used the disputed domain name for a website that creates the impression that it is officially associated with the Complainant including by prominent use of a logo with a dark font plus light orange colour device, similar to the colour scheme of the Complainant’s logo,

as well as by offering identical goods/services to those of the Complainant and the lack of any prominent disclaimer. In addition, the Panel notes that at least some of the products offered on the website at the disputed domain name use the same name and photos as those on the Complainant's website.

Furthermore, the Respondent has not come forward to explain or defend its behaviour and there is no obvious explanation as to why the Respondent, who has an address in the United States, would have selected a domain name reproducing the Complainant's trade mark comprising terms in Dutch. In all the circumstances of this case, the Panel finds that the most likely explanation is that the Respondent set up a website in Dutch, targeting the same market where the Complainant had been operating for years prior to the registration of the disputed domain name, in order to take unfair advantage of the Complainant's trade mark.

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 <lamp-enlicht.com> be transferred to the Complainant.

/Adam Taylor/

Adam Taylor

Sole Panelist

Date: March 4, 2026