

## ADMINISTRATIVE PANEL DECISION

Ecolab USA Inc. v. Userdc Dger and Tyhn Dg  
Case No. D2026-0265

### 1. The Parties

The Complainant is Ecolab USA Inc., United States of America (“United States”), represented by Greenberg Traurig, LLP, United States.

The Respondents are Userdc Dger, United States, and Tyhn Dg, Timor-Leste.

### 2. The Domain Names and Registrar

The disputed domain names <ecolabhome.shop>, <ecolabsale.shop>, and <ecolabusa.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 January 22, 2026. On January 23, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On January 23, 2026, 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 (Redacted for Privacy, Privacy Service Provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 26, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant either to 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 January 28, 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 Respondents of the Complaint, and the proceedings commenced on February 4, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 24, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on February 26, 2026.

The Center appointed Ian Lowe as the sole panelist in this matter on March 6, 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.

The amended Complaint was filed in relation to nominally different domain name registrants. For the reasons set out below, the Panel finds it appropriate to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as “the Respondent”) in a single proceeding.

#### 4. Factual Background

The Complainant is a global company offering water, cleaning, hygiene, and infection prevention products and services. It serves millions of customers in the food, energy, healthcare, life sciences, industrial, hospitality, and retail markets. The Complainant provides its products and services under the ECOLAB brand in more than 170 countries and has continuously used the coined and widely recognised mark ECOLAB for over 30 years.

The Complainant is the registered proprietor of numerous trademark registrations for ECOLAB, including United Kingdom trademark number 1288818 registered on May 25, 1990; International trademark number 1005780 registered on April 6, 2009; and United States trademark number 3965037 registered on May 24, 2011.

Since at least 1996, the Complainant has promoted and offered its products and services through its website at “www.ecolab.com”.

The disputed domain names were registered between June 28, 2025 and July 25, 2025. None of them currently resolves to an active website. However, the Complainant has adduced evidence that at the time of preparation of the Complaint each of the disputed domain names resolved to different websites but all of which had the following characteristics:

- 1) The banner of the web pages featured the following device and ECOLAB mark on the left-hand side:



The Complainant’s website does not include the device to the left of the ECOLAB mark;

- 2) The websites purported to offer for sale a wide range of cleaning products, including ECOLAB branded products and other products of the type offered for sale by the Complainant;
- 3) The websites all carried the “Copyright 2025 □ ecolab” at the foot of its pages; and
- 4) The menu options in the footer of the web pages included “Flash Sale” and “Wish List”.

Investigators instructed by the Complainant made test purchases from each of the three websites. In all cases, payment was directed to be made on the same online payment platform. After each purchase, the user was directed to the same webpage (“www.zyo\*\*\*spg.shop”) informing them that the purchase had been completed, and an email was subsequently received from the online payment platform stating that payment had been authorised to the same named individual. The website at “www.zyo\*\*\*spg.shop” was an ecommerce website whose contact phone number and address in the United States were determined to be non-existent. No communication or merchandise was received from the purported sellers.

## 5. Parties' Contentions

### A. Complainant

The Complainant contends that each of the disputed domain names is confusingly similar to its ECOLAB mark (the "Mark"), that the Respondent has no rights or legitimate interests in respect of the disputed domain names and that the Respondent registered and is using the disputed domain names in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

### B. Respondent

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

## 6. Discussion and Findings

For this Complaint to succeed in relation to the disputed domain names the Complainant must prove that:

- (i) each of the disputed domain names 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 names; and
- (iii) the disputed domain names have been registered and are being used in bad faith.

### 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.

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 Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.11.2.

As regards common control, the Panel notes the matters set out above in the Factual Background. In particular, the disputed domain names were all registered within a four week period with the same Registrar; each of the disputed domain names has resolved to a website featuring the Mark and the same small logo; the websites all purported to offer for sale at discounted prices cleaning products branded with the Mark, and other products of the type offered for sale by the Complainant; and the test purchases made by investigators on behalf of the Complainant all resulted in payment to the same individual.

In the circumstances, the Panel is satisfied that each of the disputed domain names and corresponding websites are under 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 in a single proceeding.

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

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

Ignoring the generic Top-Level Domain ("gTLD") ".shop", the disputed domain names each comprise the entirety of the Mark with the addition variously of the terms "home", "sale" and "usa". The Panel finds that the addition of these terms does not prevent a finding of confusing similarity between the disputed domain names and the Mark. [WIPO Overview 3.1](#), section 1.8. Accordingly, the Panel finds that each of the disputed domain names is confusingly similar to a trademark in which the Complainant has rights, and 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. Accordingly, 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.

The Complainant has made out a strong prima facie case that the Respondent could have no rights or legitimate interests in respect of the disputed domain names. The Respondent has used the disputed domain names not in connection with a bona fide offering of goods or services, but for websites prominently featuring the ECOLAB mark and purporting to offer the Complainant's and other products for sale at discounted prices without any indication that it has no relationship with the Complainant.

There is no suggestion that the Respondent has ever been known by the disputed domain names. The Respondent has chosen not to respond to the Complaint or to take any steps to counter the prima facie case established by the Complainant. In the circumstances, the Panel finds that the Respondent does not have any rights or legitimate interests in respect of the disputed domain names.

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 light of the nature of the disputed domain names, incorporating the entirety of the Mark, the Respondent's use of its websites to purport to sell the Complainant's products and other products offered by the Complainant, and the use of the notice "Copyright 2025 □ ecolab" on each of the Respondent's websites, the Panel is in no doubt that the Respondent had the Complainant and its rights in the Mark in mind when it registered the disputed domain names.

The Panel finds that the Respondent intended to mislead Internet users into believing that the disputed domain names were operated or authorized by the Complainant, attracting Internet users by creating a likelihood of confusion with the Mark. In light of the findings of the investigators instructed by the Complainant, the Panel is satisfied that the Respondent registered and, as set out above, has used the disputed domain names to imitate the Complainant and to purport to sell the Complainant's products and other products fraudulently. Panels have held that the use of a domain name for such illegal activity constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

Having reviewed the evidence, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy and that the third element of the Policy has been established.

## **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 <ecolabhome.shop>, <ecolabsale.shop>, and <ecolabusa.shop> be transferred to the Complainant.

*/Ian Lowe/*

**Ian Lowe**

Sole Panelist

Date: March 17, 2026