

ADMINISTRATIVE PANEL DECISION

Hlife Vila Sp. Z o.o. v. Madhu Chiluka

Case No. D2026-0384

1. The Parties

The Complainant is Hlife Vila Sp. Z o.o. (formerly Healthylife Martin Karov Monika Karov S.C.), Poland, internally-represented.

The Respondent is Madhu Chiluka, United States of America ("United States"), self-represented.

2. The Domain Name and Registrar

The disputed domain name <lymeherbs.com> is registered with TurnCommerce, Inc. DBA NameBright.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on January 29, 2026. On January 30, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 30, 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 ("Green Dragon Botanicals, Timothy Scott") and contact information in the Complaint. The Center sent an email communication to the Complainant on February 2, 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 February 3, 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 February 5, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 1, 2026. The Response was filed with the Center on February 25, 2026. On February 25, 2026, the Center received a supplemental filing from the Complainant.

The Center appointed David Taylor as the sole panelist in this matter on March 5, 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.

On March 27, 2026, the Panel issued Administrative Panel Procedural Order No. 1 inviting the Respondent to submit a limited reply addressing the matters raised in the Complainant's supplemental filing. The Respondent did not submit a reply to the Panel Order.

4. Factual Background

The Complainant is a Polish limited liability company. The company has existed since 2014 and operates under the Lymeherbs brand, offering treatment and natural/herbal support protocols for Lyme disease. The Complainant's area of business includes food supplements, dietetic substances adapted for medical use, medicinal herbs, and pharmaceutical preparations supporting treatment of Lyme disease and related conditions. The Complainant operates its official website under the domain name <lymeherbs.eu>, registered in 2015.

The Complaint is based on the following registered trademarks:

- European Union Trade Mark No. 018035800, LYMEHERBS, registered on July 12, 2019; and
- Polish Trademark Registration No. R.287304, LYMEHERBS, registered on September 21, 2016.

The disputed domain name lists a creation date of April 14, 2015. According to the Complaint, the disputed domain name was acquired by the Respondent approximately six months before the filing of the Complaint (around mid-2025).

The Respondent operates a United States-based herbal supplement business, focusing on herbal products associated with Lyme disease wellness protocols. The Respondent claims to have registered the disputed domain name on April 8, 2022.

The disputed domain name previously redirected to the website "www.greendragonbotanicals.com" (the "Green Dragon Botanicals website"), which sells competing herbal supplements for Lyme disease and ships to Europe, including Poland. On January 14, 2026, the Complainant sent a cease-and-desist letter to the Respondent, subsequent to which the redirection was disabled. At the time of this Decision, the disputed domain name is inactive.

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.

The Complainant asserts rights in the trademark LYMEHERBS. The Complainant submits that the disputed domain name is identical to its trademark.

The Complainant submits that the Respondent has no rights or legitimate interests in the disputed domain name. According to the Complaint, the Respondent operates under the name "Green Dragon Botanicals" and has no legitimate association with "Lymeherbs". The Complainant claims there is no evidence of the Respondent's bona fide use of the disputed domain name prior to notice of the dispute, and that the Respondent is not commonly known by the disputed domain name nor holds any relevant trademark rights. The use of the disputed domain name, which redirects users to a competing site selling comparable products, is characterized as misleading and not a legitimate noncommercial or fair use.

The Complainant submits that the Respondent registered and is using the disputed domain name in bad faith. The Complainant contends that the Respondent acquired the disputed domain name only recently, well after the registration of the Complainant's trademark and the establishment of its brand's goodwill in Europe. The Complainant alleges that the Respondent uses the disputed domain name to attract users to its own competing business by creating confusion with the Complainant's trademark, thereby disrupting the Complainant's business, and intentionally diverting potential customers for commercial gain.

The Complainant requests transfer of the disputed domain name.

B. Respondent

The Respondent contends that the Complainant has not satisfied the requirements of the second and third elements of the Policy.

The Respondent acknowledges that the disputed domain name contains the words "Lyme" and "herbs" but emphasizes that these are dictionary words forming a descriptive phrase relevant to herbal products associated with Lyme disease. The Respondent argues that such descriptive terms receive narrower protection under trademark law.

Under the second element, the Respondent asserts legitimate interests in the disputed domain name by highlighting that Green Dragon Botanicals has operated a Lyme-focused herbal supplement business since 2009. The disputed domain name was registered as part of the Respondent's business expansion and directly corresponds to a descriptive phrase relevant to its established industry niche. The Respondent states that the disputed domain name was not registered for resale to the Complainant, nor has the Respondent used the Complainant's branding or claimed any affiliation. The registration of a domain name consisting of descriptive terminology aligned with an existing business, the Respondent argues, constitutes a legitimate interest under the Policy.

The Respondent denies both bad faith registration and use. The Respondent states that the disputed domain name was registered in 2022, after more than 13 years of operating in the relevant business and was motivated by the descriptive relevance of the phrase rather than any intent to target the Complainant. There is no evidence of an attempt to sell the disputed domain name to the Complainant or to exploit the Complainant's trademark rights. The disputed domain name temporarily redirected to the Respondent's primary website without referencing or implying affiliation with the Complainant, and this redirect was promptly disabled upon receiving notice from the Complainant. The disputed domain name is currently inactive, and there has been no impersonation, fraudulent activity, or attempt to mislead consumers.

The Respondent requests that the Complaint be denied.

C. The Complainant's Supplemental Filing

Further to the submission of the Response, the Complainant submitted an unsolicited supplemental filing, which introduces a number of additional arguments.

The Complainant challenges the Respondent's assertion regarding the date at which the disputed domain name was registered. According to the Complainant, the original creation date for the disputed domain name was in 2015 and not 2022, and that the 2022 date refers to a later registrant change, renewal, or transfer event.

The Complainant provides an analysis of the screen capture history available at "Archive.org", and notes that the disputed domain name was dormant, with no evidence of use by the Respondent prior to mid-2025, and that the abusive redirection to the Green Dragon Botanicals website only began in July 2025.

The Complainant rebuts the Respondent's claim of rights or legitimate interests by emphasizing the lack of evidence for bona fide use or demonstrable preparations to use the disputed domain name prior to notice of the dispute, and that using the disputed domain to redirect to a competing commercial site is not legitimate.

The Complainant asserts that the Respondent did not promptly disable the redirection after receiving a cease-and-desist letter but only did so after the present Complaint was filed.

The Complainant further asserts that the Complainant has commercial activity and measurable search traffic from the United States, therefore the Respondent's use of the disputed domain name risked diverting not only European but also United States-based customers, further evidencing bad faith and intent to exploit the Complainant's goodwill in the Respondent's home market.

The Complainant argues that the Response relies on misleading and unsubstantiated claims and reiterates its request for transfer of the disputed domain name.

6. Discussion and Findings

6.1. Procedural Issue: Admissibility of the Complainant's Supplemental Filing

The Panel has discretion under paragraphs 10 and 12 of the Rules to determine the admissibility of supplemental filings. Unsolicited supplemental filings are generally discouraged unless specifically requested by the Panel. However, such filings may be admitted if the submitting party clearly demonstrates their relevance to the case and explains why the information could not have been provided in the initial complaint or response. WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.6.

In this case, the Complainant's supplemental filing addresses alleged material factual inaccuracies in the Response, provides new evidence regarding the timing and nature of the Respondent's use of the disputed domain name, and rebuts specific assertions made in the Response that could not have been anticipated or addressed in the original Complaint. Accordingly, the Panel finds that the Complainant has shown sufficient relevance and justification for the supplemental filing, and it is therefore admitted into the record. The Panel notes that the Respondent was afforded the opportunity to reply to the Complainant's supplemental filing and notes that the Respondent elected not to make any further submissions.

6.2. Procedural Issue: Identity of the Respondent

The Panel notes that the Registrar has disclosed "Madhu Chiluka" as the registrant of the disputed domain name. However, the Response was filed by "Timothy Scott" on behalf of "Green Dragon Botanicals" using an email address different from that confirmed in the Registrar's verification response. The record does not contain evidence establishing that Mr. Scott is authorized to act on behalf of the registrant of the disputed domain name, nor does it clarify the relationship between Mr. Scott, Green Dragon Botanicals, and the registrant of record, Madhu Chiluka. While the Panel observes that the disputed domain name previously redirected to a website operated by Green Dragon Botanicals, and it appears likely that there is a connection between the registrant, Madhu Chiluka, and the entity operating the website to which the disputed domain name previously redirected, this relationship has not been formally established on the record (despite a request from the Panel for the Respondent to provide clarification on this point). Notwithstanding the above, based on the evidentiary record before it, the Panel considers that the redirection conduct is appropriately attributable to the named registrant, Madhu Chiluka. In particular, the Panel infers that the disputed domain name's technical configuration (including name servers and HTTP redirection behavior) was presumptively managed by the registrant of record, and the Response submitted on behalf of Green Dragon Botanicals expressly acknowledges that the disputed domain name temporarily redirected to the "Respondent's primary website", i.e., the Green Dragon Botanicals website. Taken together, these factors provide a sufficient basis to attribute the implementation and effects of the redirection to the registrant of record for purposes of the Policy.

6.3. Substantive Matters

In order to prevail, the Complainant must demonstrate that it has satisfied the requirements of paragraph 4(a) of the Policy:

- (i) The disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) The Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) The disputed domain name was 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 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. The Complainant has provided evidence of its registered rights in LYMEHERBS, the details of which are included in the factual background section above.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

To the extent the Respondent argues that "Lyme" and "herbs" are dictionary words or that the Complainant's trademark is descriptive, such contentions do not affect the Panel's findings under the first element of the Policy. Where a complainant holds a valid trademark registration, panels generally find this sufficient for purposes of the first element. [WIPO Overview 3.1](#), section 1.2.

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.

The Complainant has shown that it has not authorized the Respondent to use the LYMEHERBS trademark, that the Respondent is known in trade as "Green Dragon Botanicals" rather than "Lymeherbs", and that the disputed domain name has been used to redirect Internet users to the Respondent's competing commercial website. The Respondent has provided no evidence that, before notice of the dispute, it used or made demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods or services pursuant to paragraph 4(c)(i) of the Policy. To the contrary, the redirection of the disputed domain name to a competing commercial site commenced months before notice of the dispute and is not consistent with a bona fide offering. See [WIPO Overview 3.1](#), section 2.2.

Nor is there evidence that the Respondent has been commonly known by the disputed domain name within the meaning of paragraph 4(c)(ii). The Respondent does not claim, and the record does not show, that it has traded under, been identified by, or acquired any trademark rights in "Lymeherbs".

The evidence of the Respondent's use of the disputed domain name is manifestly commercial in nature and does not amount to legitimate noncommercial or fair use under paragraph 4(c)(iii) of the Policy.

The Panel has considered the Respondent's argument that the disputed domain name comprises dictionary words used descriptively in relation to herbal products for Lyme disease. Prior UDRP panels have consistently held that merely registering a domain name comprised of a dictionary word or phrase does not

by itself confer rights or legitimate interests. To rely on the dictionary meaning, a respondent must not trade off third-party trademark rights. [WIPO Overview 3.1](#), section 2.10. Here, the Panel considers that the disputed domain name was not being used to host content used in a descriptive sense. Rather, it redirected users to the Green Dragon Botanicals website offering competing products under a distinct and independent brand. The Panel further notes the Complainant has operated under the LYMEHERBS mark as of 2015, which is supported by its use of the domain name <lymeherbs.eu>, significantly predating the Respondent's claimed date of acquisition of the disputed domain name in 2022. In these circumstances, the Panel finds that the Respondent's reliance on the descriptive nature of the terms does not establish rights or legitimate interests in the disputed domain name.

The subsequent deactivation of the redirection and the current passive holding of the disputed domain name do not confer rights or legitimate interests on the Respondent, and do not cure the lack thereof at the relevant time.

Having considered the submissions of both Parties, the Panel finds that the Respondent has no rights or legitimate interests in respect of the disputed domain name. 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) establishes circumstances, in particular, but without limitation, that, if found to be present, shall be evidence of the registration and use of a domain name in bad faith.

Whether the Respondent registered/acquired the disputed domain name in 2022 (as it claims) or in mid-2025 (as the Complainant contends), both dates postdate the Complainant's registered rights (dating from 2016 onwards). Panels generally treat a transfer to or acquisition by a respondent as a new registration for purposes of the bad-faith analysis. [WIPO Overview 3.1](#), section 3.9. Noting the nature of the disputed domain name, being identical to the Complainant's trademark, the Parties' overlapping business operations in a relatively specialized industry, and the redirection of the disputed domain name to a competing site as described above, the Panel infers that the Respondent registered the disputed domain name with knowledge of and intent to target the Complainant's LYMEHERBS trademark. The Complainant has also shown that it engages in United States-facing activity, making it more likely that the Respondent, a United States-based operator in the same field, was aware of and targeted the Complainant when acquiring the disputed domain name.

While it is acknowledged that both Parties operate in the Lyme disease herbal supplement space and that the terms "Lyme" and "herbs" are to an extent descriptive of that business, as noted above, the mere descriptiveness of the disputed domain name does not automatically render the Respondent's registration and subsequent use of the disputed domain name bona fide. Critically, the evidence on record does not demonstrate that the Respondent used the disputed domain name directly in connection with its dictionary meaning. Rather, the Respondent only began using the disputed domain name to redirect to its own competing commercial site with its own distinct branding ("Green Dragon Botanicals") offering competing herbal supplements, including to European destinations such as Poland where the Complainant is based, after the Complainant's trademarks and goodwill were established. In these circumstances, the descriptive nature of the disputed domain name does not outweigh the evidence of bad faith use to divert Internet users and disrupt the Complainant's business.

By using the disputed domain name in the manner described above, the Panel finds that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's LYMEHERBS trademark as to source, sponsorship, affiliation, or endorsement of the Green Dragon Botanicals website and the goods offered therein, in bad faith pursuant to paragraph 4(b)(iv) of the Policy. The Panel further finds that the Respondent's disabling of the redirection only after notice of the present dispute and the current passive holding of the disputed domain name does not cure the prior bad faith use.

The Panel finds that the disputed domain name was registered and has been used in bad faith. 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 <lymeherbs.com> be transferred to the Complainant.

/David Taylor/

David Taylor

Sole Panelist

Date: May 14, 2026