

ADMINISTRATIVE PANEL DECISION

Nicenic International Group co., Limited, Nicenic LLC v. Jukka Koskinen
Case No. D2026-0653

1. The Parties

The Complainants are Nicenic International Group co., Limited, Hong Kong, China, and Nicenic LLC, United States of America (“United States”), internally represented.

The Respondent is Jukka Koskinen, Finland, self-represented.

2. The Domain Names and Registrar

The disputed domain names <nicenic.blog>, <nicenic.support>, <nicenic.top>, and <nicenic.xyz> are registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 15, 2026. On February 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On February 16, 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 (“unknown”) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 17, 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 amendment to the Complaint on the same date.

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 February 18, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 10, 2026. The Respondent sent informal emails to the Center on February 17, 2026, and February 18, 2026. The Response was filed with the Center on February 23, 2026. The Complainant filed a first supplemental filing on February 28, 2026. The Respondent filed a supplemental filing on March 2, 2026. The Complainant filed a second supplemental filing on March 7, 2026.

The Center appointed Andrew D. S. Lothian as the sole panelist in this matter on March 2, 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 Complainants are affiliated companies, registered in Hong Kong, China and the United States respectively. For the sake of consistency, they will be referred to together as “the Complainant” unless the context otherwise dictates. The Complainant operates an ICANN-accredited domain name registrar and uses the domain names <nicenic.net> and <nicenic.com> for its official websites.

The second Complainant, Nicenic LLC, is the owner of United States Registered Trademark Number 7843916 in respect of the stylized word mark NICENIC, with “NICE” being in black and “NIC” being in red, all in the same decorative typeface, registered on June 24, 2025, in Class 45 (broadly speaking, domain name registrar and registration services).

The disputed domain names were registered as follows:

<nicenic.blog> was registered on October 19, 2025;
<nicenic.support> was registered on October 11, 2025;
<nicenic.top> was registered on October 19, 2025; and
<nicenic.xyz> was registered on October 11, 2025.

The Respondent is a private individual with an address in Finland.

In terms of how the disputed domain names are used, the disputed domain name <nicenic.blog> is associated with a website with the title, “How Nicenic is Helping Cyber Criminals”, which contains material critical of the Complainant’s domain name registrar, notably in connection with allegations concerning how the said registrar handles abuse reports. The disputed domain names <nicenic.support> and <nicenic.xyz> forward traffic to <nicenic.blog>. While the Complainant states that <nicenic.top> previously redirected to <nicenic.blog>, and presently is subject to registrar-imposed serverHold status, the Respondent asserts that it has been reinstated. In any event, nothing turns on this matter, and the Panel notes the Respondent has confirmed that its intended purpose is or was to use all disputed domain names other than <nicenic.blog> to forward to <nicenic.blog> where the above-described content is found.

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.

Notably, the Complainant contends that in addition to its registered trademark, it has operated its official website at the domain name <nicenic.net>, registered on September 27, 2004, and <nicenic.com>, registered on January 6, 2006, noting that this establishes a longstanding online presence under the NICENIC mark. The Complainant submits that each of the disputed domain names incorporates the NICENIC mark in its entirety, adding that the addition of the various generic Top-Level Domains (“gTLDs”) does not prevent a finding of confusing similarity.

The Complainant asserts that the Respondent is not affiliated with the Complainant in any way and has never been authorized to use its NICENIC trademark, that there is no evidence that the Respondent is commonly known by the name “nicenic”, that the disputed domain names consist solely of the Complainant’s

trademark without any additional wording or distinguishing term that would indicate an independent third party commentary site, and that the Respondent has created an immediate and unavoidable likelihood of confusion as to source, sponsorship, affiliation, or endorsement by registering disputed domain names that are identical to the Complainant's mark. The Complainant notes that while Panels under the Policy recognize that genuine noncommercial criticism may in certain circumstances constitute fair use, such protection does not extend to domain names that are identical to a complainant's mark which falsely suggest official association.

The Complainant contends that the disputed domain names were registered several months after the registration of the Complainant's NICENIC trademark, whereby the timing of registration demonstrates that the Respondent had knowledge of the Complainant's trademark rights. The Complainant notes that the disputed domain names were registered within a short period of time, arguing that this demonstrates a pattern of conduct targeting the Complainant's trademark. The Complainant notes that the disputed domain names redirect (or previously redirected) to the website associated with the disputed domain name <nicenic.blog>, indicating centralized control and deliberate targeting of the Complainant's established online presence, adding that the Respondent has used the disputed domain names to publish allegations and accusations targeting the Complainant's business. The Complainant produces purported evidence of consumer confusion whereby customers contacted the Complainant asking whether the disputed domain names <nicenic.xyz> and <nicenic.support> were affiliated with the Complainant and whether the content was legitimate, arguing that this confirms that the disputed domain names create a likelihood of confusion and disrupt the Complainant's commercial activities.

The Complainant asserts that while panels under the Policy recognize that genuine noncommercial criticism may in some circumstances be permissible, the Respondent's conduct goes beyond mere criticism in that the Respondent has registered multiple disputed domain names that are identical to the Complainant's registered trademark, thereby creating a false impression of official affiliation, misleading Internet users as to the source or sponsorship of any associated websites, and preventing the Complainant from reflecting its trademark in corresponding domain names. The Complainant submits that the Respondent's action in registering multiple disputed domain names identical to the Complainant's trademark, and using these in a coordinated manner to mislead Internet users and disrupt the Complainant's business, constitutes bad faith registration and use in terms of the Policy.

B. Respondent

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Respondent submits that it uses the disputed domain names solely for independent journalistic reporting, cybersecurity research, and public-interest critical commentary regarding the Complainant's business practices, adding that the websites are strictly noncommercial, containing no advertisements or monetization mechanisms, and are not intended to mislead, impersonate, or defraud the Complainant. The Respondent adds that no confusion exists regarding affiliation or endorsement, and that the purpose of the website(s) associated with the disputed domain names is educational and informational, in that they provide detailed reporting on weak abuse procedures, phishing activity, and potential violations of ICANN's Registrar Accreditation Agreement, aiming to inform the public and enhance Internet security.

The Respondent submits that the Complainant's evidence does not demonstrate actual confusion as to source or affiliation but rather shows third parties discussing or questioning the Respondent's reporting, which does not establish that users believed that its website was operated by or affiliated with the Complainant, adding that the presence of a disclaimer negates any likelihood of confusion. The Respondent states that the registration of the disputed domain names does not indicate bad faith where these all resolve or redirect to the same noncommercial commentary website and are used consistently for the same legitimate purpose, adding that panels under the Policy have recognized that defensive or parallel domain name registrations do not by themselves establish bad faith, absent commercial exploitation or impersonation. The Respondent states that any updates to its website reflect new information or corporate

developments consistent with responsible investigative or journalistic reporting, asserting that these do not transform legitimate commentary into bad faith use.

The Respondent notes that the disputed domain name <nicenic.top> was subsequently reinstated after the Respondent contacted the registry for clarification, adding that its temporary status does not constitute evidence of bad faith registration or use and amounts to an administrative action not involving substantive adjudication under the Policy.

The Respondent asserts that its use of the disputed domain names falls within the scope of paragraph 4(c)(iii) of the Policy, adding that its content is public interest reporting about the Complainant's business practices, including documented cases and tolerance of phishing and fraudulent activity which contributes to public knowledge and awareness without commercial intent. The Respondent cites the following cases in support of its contentions regarding alleged genuine noncommercial criticism, namely: *Courtney Cox, Ivy Lane Living v. Domain Admin, Privacy Protect, LLC (PrivacyProtect.org) / Betsy Riot, Betsy Riot*, WIPO Case No. [D2018-1256](#); *Bridgestone Firestone, Inc., Bridgestone/Firestone Research, Inc., and Bridgestone Corporation v. Jack Myers*, WIPO Case No. [D2000-0190](#); *Covance, Inc. and Covance Laboratories Ltd. v. The Covance Campaign*, WIPO Case No. [D2004-0206](#); and, *Britannia Building Society v. Britannia Fraud Prevention*, WIPO Case No. [D2001-0505](#).

The Respondent states that at the time of registration of the disputed domain names, there was no intent to sell these to the Complainant, no effort to impersonate or disrupt the Complainant's business, no intent to mislead Internet users, and no intent to profit from the Complainant's trademarks, adding that the disputed domain names are clearly labelled to indicate research and reporting focusing on public interest investigation, cybersecurity reporting and transparency, noting that they feature prominent disclaimers. The Respondent contends that such use without commercial gain and with clear disclaimers has been found consistently by panels under the Policy not to constitute bad faith.

The Respondent asserts that it did not receive any communications from the Complainant via the email address on the website associated with the disputed domain names.

The Respondent concludes that upholding the Complaint would suppress independent reporting and research, contrary to Policy jurisprudence. The Respondent also requests a finding of Reverse Domain Name Hijacking on the basis that the Complainant was aware of the noncommercial and critical nature of the website associated with the disputed domain names but brought the administrative proceeding to silence legitimate speech.

6. Discussion and Findings

6.1. Preliminary issue: Consolidation of Multiple Complainants

The present Complaint is brought by two affiliated corporate entities, claiming a common legal interest in the NICENIC trademark and a common grievance against the Respondent, and thus, have requested the Panel to consolidate their respective complaints against the Respondent. The Response did not address the topic of Complainant consolidation.

In assessing whether a complaint filed by multiple unrelated complainants may be brought against a single respondent, panels look at whether (i) the complainants have a specific common grievance against the respondent, or the respondent has engaged in common conduct that has affected the complainants in a similar fashion, and (ii) it would be equitable and procedurally efficient to permit the consolidation. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.11.1.

In the present case, the Panel considers that consolidation is both equitable and procedurally efficient, and that the Complainants have a specific common grievance against the Respondent by virtue of being affiliated entities whose rights are equally affected by the Respondent's actions. The registration of the disputed

domain names by the Respondent could be considered as affecting each of the Complainants in a similar manner. In all of these circumstances, the Panel orders consolidation of the Complainants' respective Complaints.

6.2. Preliminary issue: Parties' Supplemental Filings

Paragraph 12 of the Rules expressly provides that it is for the panel to request, in its sole discretion, any further statements or documents from the parties it may deem necessary to decide the case. Unsolicited supplemental filings are generally discouraged, unless specifically requested by the panel. [WIPO Overview 3.1](#), section 4.6.

Panels have sole discretion, under paragraphs 10 and 12 of the Rules, whether to accept an unsolicited supplemental filing from either party, bearing in mind the need for procedural efficiency, and the obligation to treat each party with equality and ensure that each party has a fair opportunity to present its case. The party submitting a supplemental filing would normally need to show its relevance to the case and explain why it was unable to provide that information in the complaint or response (for example, owing to some exceptional circumstance).

As noted above, the Complainant filed a first supplemental filing on February 28, 2026, which the Respondent sought to answer by way of its own supplemental filing, filed on March 2, 2026. The Complainant's first supplemental filing sought to introduce updated information relating to registry action regarding the disputed domain names <nicenic.top> and <nicenic.xyz>, together with an alleged visual modification to the website associated with the disputed domain name <nicenic.blog>, said to have occurred after the Complaint was filed. The Respondent's supplemental filing was accompanied by a request that it be considered in the event that the Panel admitted the Complainant's supplemental filing.

The Panel considers that nothing turns on the new information contained in the Complainant's unsolicited supplemental filing, and accordingly declines to admit it. It follows that there is no basis to admit the Respondent's supplemental filing, which is expressed as being tendered solely in reply to that of the Complainant.

The Complainant's second supplemental filing was filed on March 7, 2026. This asserted that the Respondent had registered some nine further domain names, which exclusively contained the Complainant's NICENIC trademark in their respective Second-Level Domains, between February 18, 2026, and February 22, 2026, in other words, after the filing of the Complaint. Of these newly identified domain names, the Complainant reported that some eight were pointed to the disputed domain name <nicenic.blog> and one was inactive. The Complainant stated that this information was provided as factual evidence only, adding that it did not seek to amend the Complaint, expand the scope of the proceeding, or request relief in respect of the said domain names. As with the Complainant's first supplemental filing, the Panel considers that nothing turns on this information for the purposes of the present administrative proceeding involving the disputed domain names, noting specifically that the Complainant does not seek to add any of the newly identified domain names into the ongoing proceeding (on which topic, see [WIPO Overview 3.1](#), section 4.12). Accordingly, the Panel declines to admit the Complainant's second supplemental filing.

6.3. Substantive issues

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 Panel finds the mark is recognizable within the disputed domain names, in that the Second-Level Domain of each is alphanumerically identical to the Complainant's mark. Accordingly, the disputed domain names are identical to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The applicable Top-Level Domain ("TLD") in a domain name (e.g., ".com", ".club", ".nyc") is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

In the present case, the Parties are agreed that the website associated with the disputed domain names contains material that is critical of the Complainant's business.

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 Response in the present case is focused on paragraph 4(c)(iii) of the Policy, namely that the Respondent asserts that it is making a legitimate noncommercial or fair use of the disputed domain names, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark at issue.

Policy jurisprudence recognizes that the use of a domain name for fair use such as noncommercial free speech, would in principle support a respondent's claim to a legitimate interest under the Policy. [WIPO Overview 3.1](#), section 2.6. To support the claim to fair use, the Respondent's criticism must be genuine (i.e., not pretextual). In assessing this, panels do not look at the veracity or accuracy of the criticism as such, nor any allegations that the criticism is defamatory in nature; rather they will look at whether the motivation behind the criticism is genuine, as opposed to being a sham or pretext to hide another motive such as cybersquatting or commercial activity. [WIPO Overview 3.1](#), section 2.6.1. Here, the Panel accepts the Respondent's contention that its motivation behind the criticism is genuine and does not hide a motive such as cybersquatting or commercial activity.

Nevertheless, panels under the Policy have increasingly found that even a general right to legitimate criticism does not necessarily extend to registering or using a domain name identical to a trademark (i.e., <trademark.tld> (including typos)); even where such a domain name is used in relation to genuine noncommercial free speech, panels tend to find that such a domain name creates an impermissible risk of user confusion through impersonation. [WIPO Overview 3.1](#), section 2.6.2. That is the case for all of the disputed domain names here, which each feature the Complainant's NICENIC mark without modification or adornment and, notably, without any additional text that might signal to Internet users the presence of criticism on the associated website. The Panel further notes the Respondent's choice of TLDs for the disputed domain names, in particular ".support".

With regard to the Respondent's position that the presence of a disclaimer on the website to which the disputed domain names point underlines the fairness of its use of the disputed domain names, the Panel agrees with the panel's analysis in *1066 Housing Association Ltd. v. Mr. D. Morgan*, WIPO Case No. [D2007-1461](#), in which it noted, "It is one thing for a person to stand on a street corner and to voice his concerns about and criticism of a trademark owner. It is quite another to pretend to passers-by that you represent the trademark owner and once you have caught their attention to reveal your true identity and real intentions. The same is so on the Internet. It is for this reason that it is no answer for a respondent to claim that once the Internet user arrives at the relevant website it then becomes apparent (whether that be as a result of the use [of] disclaimers or otherwise), who is running that site".

The Panel considers that it cannot be regarded as fair within the meaning of the Policy for a respondent to incorporate a trademark into a domain name which effectively deceives Internet users intending to visit an official website of the trademark owner into viewing critical material which they are not looking for. The Panel's own preferred analogy, which it has mentioned in previous cases under the Policy, such as, for

example, *Brad Smotherman v. Vinay Parmar*, WIPO Case No. [D2025-5216](#), and *Société civile particulière monégasque “MC 2020” v. Smiljan power solutions*, WIPO Case No. [D2023-0316](#), is that the use of such a domain name is not the equivalent of standing outside the trademark owner’s premises with a placard containing an expression of criticism and exercising one’s right of free speech; rather, it amounts to constructing a confusingly similar entrance to the trademark owner’s premises and lying in wait for an audience of visitors who do not necessarily wish to be there and who are simply looking for the correct way into the complainant’s office. In that sense, it may be seen that a disclaimer is no panacea because the deception, and thus the unfairness, has already occurred from the composition of the domain name, and has drawn the potentially unwilling, and indeed unwitting, user to the critical content.

The Panel notes that the previous cases under the Policy cited by the Respondent do not avail it in present circumstances. *Courtney Cox, Ivy Lane Living v. Domain Admin, Privacy Protect, LLC (PrivacyProtect.org) / Betsy Riot, Betsy Riot*, WIPO Case No. [D2018-1256](#), and *Bridgestone/Firestone Research, Inc., and Bridgestone Corporation v. Jack Myers*, WIPO Case No. [D2000-0190](#) are cases that applied principles of United States law to the issue of noncommercial criticism cases. While some cases involving exclusively United States parties have given particular consideration to national law, the weight of authority continues to move away from a national law approach in favor of a more uniform approach that applies supra-national principles in striving for consistency across the UDRP regardless of the location of the parties. [WIPO Overview 3.1](#), section 2.6.2. Here, in any event, only one of the Parties (in fact, one of the two Complainant entities) is based in the United States. Neither of the Parties directly argued that it would be appropriate to apply any particular approach derived from national law and the Panel would have rejected any such argument had it been made (see the extensive discussion on this topic in the recent case of *Gil Negrete v. Mustafa Derahovic*, WIPO Case No. [D2025-2775](#) with which the Panel concurs). It should also be noted that *Bridgestone/Firestone Research, Inc., and Bridgestone Corporation v. Jack Myers*, *supra*, is an early case under the Policy and predates the concept in Policy jurisprudence of “impermissible risk of user confusion through impersonation” described above. The same applies to *Britannia Building Society v. Britannia Fraud Prevention*, WIPO Case No. [D2001-0505](#).

Covance, Inc. and Covance Laboratories Ltd. v. The Covance Campaign, WIPO Case No. [D2004-0206](#) while also being a relatively early case under the Policy, could perhaps be described as one of the earliest to articulate the concept of unfairness arising from impersonation. The panel in that case noted, “There is in this Panel’s opinion merit in the view that a domain name which is identical to the Complainant’s trademark should necessarily not qualify as a ‘legitimate noncommercial or fair use’ under paragraph 4(c)(iii) regardless of website content. This is because there is an immediate potential for false association with the trademark owner and a degree of initial confusion which is at the top end of the spectrum”. Far from supporting the Respondent’s case, the particular approach in that case is consistent with the Panel’s analysis above.

In all of these circumstances, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain names, and that 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 third element analysis mirrors that of the second element noted above. As the website associated with the disputed domain names contains content that is directly related to and is critical of the Complainant and its business activities, there can be no doubt that the Respondent registered the disputed domain names with the Complainant and its rights in mind, and with intent to target these. The disputed domain names are an exact match for the Complainant’s NICENIC mark in their respective Second-Level Domains, and thus contain a high risk of implied affiliation with the Complainant and its rights. [WIPO Overview 3.1](#), section 2.5.1. The disputed domain names are being used to divert Internet users expecting to find an official site of the Complainant to the Respondent’s website on which they will encounter criticism that they are not expecting to see. The adoption of such deceptive domain names, which

impersonate the Complainant, for such a purpose “constitutes registration and use in bad faith, which cannot be cured by the content of the Respondent’s website [...]” (*Netblocks Group v. Collin Anderson*, WIPO Case No. [D2020-2240](#)).

The Panel notes for completeness that its approach here, based upon [WIPO Overview 3.1](#), section 2.6.2, arises from the inherently deceptive nature of the disputed domain names, and does not rely upon the alleged instances of actual confusion put forward by the Complainant, which are challenged by the Respondent on the basis that each of the Internet users requests the Complainant’s comments regarding the allegations contained on the Respondent’s site. The Panel also notes that the approach of Policy jurisprudence in this area is not to prevent a person such as the Respondent from airing genuinely held views that constitute noncommercial criticism, provided that the domain names connected to the corresponding website do not misleadingly or unfairly signal affiliation with the trademark owner, for example by making it clear to Internet users in the wording of the domain name concerned that they can expect to find criticism of the trademark owner at the associated online location (see for example [WIPO Overview 3.1](#), section 2.5.1, “[...] certain critical terms (e.g., <trademarksucks.com>) tend to communicate, prima facie at least, that there is no such affiliation”).

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

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.1](#), section 4.16.

The Respondent requested a finding of Reverse Domain Name Hijacking on the basis that the Complainant was aware of the noncommercial and critical nature of the website associated with the disputed domain names but brought the administrative proceeding to silence legitimate speech. Given that the Panel has found in the Complainant’s favor, it does not require to address itself to such request.

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 <nicenic.blog>, <nicenic.support>, <nicenic.top>, and <nicenic.xyz> be transferred to the Complainant.

/Andrew D. S. Lothian/

Andrew D. S. Lothian

Sole Panelist

Date: March 16, 2026