

ADMINISTRATIVE PANEL DECISION

Whirlpool Properties, Inc. v. wei Zhang
Case No. D2026-1528

1. The Parties

The Complainant is Whirlpool Properties, Inc., United States of America (“United States”), represented by ALG India Law Offices, India.

The Respondent is wei Zhang, China.

2. The Domain Name and Registrar

The disputed domain name <whirlpol.com> is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 10, 2026. On April 13, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 14, 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 (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 April 14, 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 April 16, 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 April 17, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 7, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on May 8, 2026.

The Center appointed Angelica Lodigiani as the sole panelist in this matter on May 20, 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 long-established company in the home appliance sector. Founded in 1911 (through its predecessor-in-interest), it is one of the largest manufacturers of home appliances worldwide, with approximately USD 15 billion in annual sales in 2025, around 41,000 employees, and 35 manufacturing and research centers globally.

The Complainant distributes its products in more than 170 countries through an extensive network of subsidiaries, dealers, and distributors, and provides related services such as maintenance and customer support.

The Complainant operates under the WHIRLPOOL trademark, which was first adopted in 1906 in connection with hand-operated washing machines. At the end of the thirties, the Complainant introduced the first wringer washer with motorized agitation and in 1948 it launched the first automatic washing machine.

The WHIRLPOOL mark is currently used in connection with a wide range of household appliances, including washing machines, dryers, refrigerators, air conditioners, dishwashers, water filtration systems, water heaters, cooktops, ovens, and microwaves. These products are sold globally through both physical retail outlets and online channels.

The Complainant has received numerous awards and recognitions for its products marketed under the WHIRLPOOL mark. It has been included in the various Fortune lists for several years, including the list of the most admired companies in the home equipment and furnishing industry, and the Forbes list of the World's Best Employers.

The Complainant owns numerous trademark registrations for the WHIRLPOOL mark in multiple jurisdictions worldwide, including the United States, Europe, and China. Among these trademarks, the Complainant is the owner of the following registrations:

- WHIRLPOOL (word), United States registration No. 581480, registered on October 27, 1953 and claiming first use in commerce on January 29, 1951, for goods in class 7;
- WHIRLPOOL (word), United States registration No. 937550, registered on July 11, 1972 for goods in classes 7 and 11, claiming first use in commerce since July 5, 1906 (for goods in class 7) and since May 2, 1955 (for goods in class 11); and
- WHIRLPOOL (word), European Union registration No. 000095950, registered on December 8, 1999, for goods and services in classes 7, 11 and 37.

Moreover, the Complainant is the owner of various domain names incorporating its WHIRLPOOL mark, including <whirlpool.com>, registered on December 10, 1998.

The disputed domain name was registered on November 25, 2024.

At the time of the filing of the Complaint, the disputed domain name resolved to a web page displaying the following message: "We're getting things ready. Loading your experience ... This won't take long." Previously, the disputed domain name resolved to a parking page displaying pay-per-click ("PPC") links directly related to the Complainant's business and redirecting users to third parties' advertising competing pages.

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 disputed domain name is confusingly similar to the Complainant's registered WHIRLPOOL mark. It constitutes a clear misspelling of the mark, in which one of the two consecutive letters "o" has been omitted. Moreover, the disputed domain name is also confusingly similar to the Complainant's domain name <whirlpool.com>. The omission of one letter "o" from the Complainant's mark does not prevent a finding of confusing similarity between the disputed domain name and the Complainant's mark.

The Complainant states that it has never authorized or licensed the Respondent to use the WHIRLPOOL mark and that no relationship exists between the Parties. Moreover, to the best of the Complainant's knowledge the Respondent does not own any common law or registered rights in the WHIRLPOOL mark, and the Respondent does not appear to be commonly known by the disputed domain name.

Furthermore, the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services nor for any legitimate noncommercial or fair use. The disputed domain name previously hosted a parking page provided by the Registrar, containing PPC links directly related to the Complainant's business. These links redirected users to third parties' advertising pages of a clear commercial nature.

Subsequently, the disputed domain name redirected to a landing page displaying the message "We're getting things ready".

According to the Complainant, there is no evidence of any legitimate noncommercial or fair use of the disputed domain name by the Respondent. Due to the reputation of the Complainant's mark, it is evident that the Respondent registered and used the disputed domain name to obtain undue commercial gain by exploiting the Complainant's goodwill and reputation. Such unauthorized use of the disputed domain name does not constitute a legitimate noncommercial or fair use of the disputed domain name and does not confer any rights on the Respondent.

As far as bad faith is concerned, the Complainant maintains that its WHIRLPOOL mark enjoys strong reputation. Therefore, it is unlikely and inconceivable that the Respondent was unaware of the Complainant and its well-known WHIRLPOOL mark at the time of the registration of the disputed domain name. Furthermore, the disputed domain name is a clear case of typosquatting, which is indicative of bad faith registration and use.

Lastly, according to the Complainant, the subsequent passive holding of the disputed domain name tarnishes the image of the Complainant and does not prevent a finding of bad faith. In addition, the fact that the Respondent used a privacy service to conceal its identity corroborates a finding of bad faith.

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 trademark 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 trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1. In particular, the Complainant has shown that it owns registered rights over the WHIRLPOOL trademark.

The Panel finds the mark is recognizable 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 disputed domain name is a misspelling of the Complainant's trademark as it consists of the same trademark where one letter "o" is omitted. According to section 1.9 of the [WIPO Overview 3.1](#), "[a] domain name which consists of a variation of a trademark (typically a common, obvious, or intentional misspelling, referred to as typosquatting) is considered by panels to be confusingly similar to the relevant mark for purposes of the first element".

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 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.

The Complainant states that it has no relationship with the Respondent and that it has not authorized the Respondent to use its WHIRLPOOL mark in the disputed domain name. Moreover, the Complainant has not authorized the Respondent to make use of its mark in any manner whatsoever. Nothing in the case file indicates that the Respondent has been commonly known by the disputed domain name.

The Respondent initially used the disputed domain name to resolve to a parking page containing PPC links resolving to third parties' competing websites. Subsequently, the disputed domain name resolved to a webpage displaying the message "We're getting things ready. Loading your experience ... This won't take long".

According to section 2.9 of the [WIPO Overview 3.1](#), the use of the disputed domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on, the reputation and goodwill of the Complainant's mark, or otherwise mislead Internet users. In the present case, the Panel finds that the links appearing on the page compete with the Complainant's mark. Furthermore, the disputed domain name, which is almost identical to the Complainant's mark, differing only by the omission of the letter "o", is inherently misleading for Internet users, who may erroneously believe they have reached one of the Complainant's official online locations.

Internet users are likely to click on the displayed links trusting that they will be redirected to websites linked to or endorsed by the Complainant, whereas in fact they are redirected to third parties' competing websites. The Respondent is probably earning an income from each click on these links, thereby capitalizing on the reputation and goodwill of the Complainant's WHIRLPOOL trademark.

At the time of filing of the Complaint, the disputed domain name resolved to a webpage simply stating "We're getting things ready. Loading your experience ... This won't take long".

The fact that the use of the disputed domain name changed to a passive holding cannot confer rights or legitimate interests to the Respondent in the circumstances of this case.

Accordingly, 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 finds, in line with other previous UDRP panels, that the WHIRLPOOL trademark enjoys an international reputation. The Panel is convinced that the Respondent was well aware of the Complainant and of its WHIRLPOOL mark at the time of the registration of the disputed domain name. This conclusion is supported by the extensive reputation of the Complainant's mark, the fact that the Respondent registered a domain name consisting of a common, obvious and intentional misspelling of the Complainant's mark and the fact that the disputed domain name originally led to a parking page displaying PPC links. The mere registration of a domain name that is identical or confusingly similar to a well-known trademark, particularly in cases involving typos, and particularly in the case of coined or fanciful marks, can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4.

Furthermore, the Complainant has shown that it is active in China, where the Respondent is allegedly located.

The registration of a domain name confusingly similar to a third party's trademark, with knowledge of such mark and without rights or legitimate interests amounts to registration in bad faith.

The Complainant has also demonstrated that the disputed domain name has been used to resolve to a parking page displaying links to third parties' competing websites. Such use supports a finding that the Respondent has registered and used the disputed domain name to attract, for commercial gain, Internet users to its online location by creating a likelihood of confusion with the Complainant's mark.

Panels have further found that the non-use of a domain name (including a blank or "coming soon" page) would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the reputation of the Complainant's trademark, the composition and prior use of the disputed domain name, and finds that in the circumstances of this case the current passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy. Rather, the Panel finds that the change in use reinforces the finding that there was no good faith intention behind the registration and prior use of the disputed domain name.

Accordingly, 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 <whirlpol.com> be transferred to the Complainant.

/Angelica Lodigiani/

Angelica Lodigiani

Sole Panelist

Date: June 3, 2026.