

ADMINISTRATIVE PANEL DECISION

Integrated Supply Network, LLC v. Robert Jake
Case No. D2026-1641

1. The Parties

The Complainant is Integrated Supply Network, LLC, United States of America (“US”), represented by Shutts & Bowen LLP, US.

The Respondent is Robert Jake, Kazakhstan.

2. The Domain Name and Registrar

The disputed domain name <ktoolinternational.org> is registered with Hosting Concepts B.V. d/b/a Registrar.eu. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 17, 2026. On April 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 18, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 21, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant did not file an amendment to the Complaint.

The Center verified that the Complaint met 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 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 17, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 19, 2026.

The Center appointed Rebecca Slater as the sole panelist in this matter on May 21, 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 wholesale distribution company incorporated in Florida, US. For over ten years, the Complainant and its affiliated entities have sold automotive and industrial tools, supplies and equipment. These products are marketed on the website at “www.ktoolinternational.com”.

The Complainant owns multiple US trade marks for the K-TOOL INTERNATIONAL design mark, including US Patent and Trademark Office Registration Nos. 5,177,837, 5,177,838, 5,177,839, 5,177,840, 5,177,844, 5,177,845, 5,177,846, 5,177,847, 5,177,848, 5,177,850, 5,177,851, and 5,177,886, all registered on April 17, 2017 (the “Trade Mark”). The Trade Mark was first used no later than December 4, 2014 (as per the registration for US Patent and Trademark Office Registration No. 5,177,847).

The Respondent is an individual apparently located in Kazakhstan. The Respondent did not file a Response, and consequently little information is known about the Respondent.

The disputed domain name was registered on May 22, 2025. The disputed domain name previously resolved to a website which has a design similar to the Complainant’s website and displays the Trade Mark (including on the products marketed on the website). The website is currently inactive and states “This domain has expired – please visit your provider’s website or contact their support to renew”.

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 identical or confusingly similar to the Trade Mark. The disputed domain name incorporates the entirety of the Trade Mark.
- The Respondent has no rights or legitimate interests in the disputed domain name. The Respondent has not been authorized by the Complainant to use the Trade Mark or to register the disputed domain name, and there has never been any affiliation between the Respondent and the Complainant. There is no evidence that the Respondent’s use of the disputed domain name is in connection with a bona fide offering of goods and services or that it is being used for a legitimate fair use without intent for commercial gain. The Respondent registered the disputed domain name with the intent to profit from the Trade Mark. The Respondent’s website displays the Trade Mark and offers competing products.
- The disputed domain name was registered and is being used in bad faith. The Respondent registered the disputed domain name over a decade after the Complainant established rights in the Trade Mark. The Respondent had constructive notice of the Complainant’s trade mark registrations. The Respondent’s offering of competing products is evidence of bad faith. The Complainant sent a cease-and-desist letter to the Respondent, which has not been answered.

B. Respondent

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

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all the elements enumerated in paragraph 4(a) of the Policy have been satisfied, namely:

- the disputed domain name is identical or confusingly similar to a trade mark or service mark in which the Complainant has rights;
- the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- the disputed domain name has been registered and is being used in bad faith.

The onus of proving these elements is on the Complainant.

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.

Here, the design (or figurative/stylized) elements of the Trade Mark are incapable of representation in a domain name, so are disregarded for purposes of assessing identity or confusing similarity under the first element. [WIPO Overview 3.1](#), section 1.10. By reference to the textual elements of the Trade Mark only, the entirety of the Trade Mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the Trade 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 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 has not authorized the Respondent to use its Trade Mark and there is no evidence that the Respondent is commonly known by the disputed domain name.

The evidence provided by the Complainant indicates that the disputed domain name has been used to either: (a) impersonate the Complainant and its business; or (b) to create the incorrect impression that the

Respondent is affiliated with the Complainant in order to take an unfair advantage of such impression. Either use would not give rise to rights or legitimate interests in the disputed domain name under the Policy. Panels have held that the use of a domain name for illegitimate activity (here, passing off) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.1](#), section 3.2.1.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

The disputed domain name was clearly acquired with knowledge of the Complainant and the Trade Mark, given the composition of the disputed domain and the content of the website at the disputed domain name. This supports a finding that the Respondent has registered the disputed domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Trade Mark. [WIPO Overview 3.1](#), section 3.1.4.

Panels have held that the use of a domain name for illegitimate activity (here, passing off) constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

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 <ktoolinternational.org> be transferred to the Complainant.

/Rebecca Slater/

Rebecca Slater

Sole Panelist

Date: May 27, 2026