

ADMINISTRATIVE PANEL DECISION

Simpson Strong-Tie Company Inc. v. Carolyn Hull
Case No. D2026-1783

1. The Parties

The Complainant is Simpson Strong-Tie Company Inc., United States of America (“United States” or “U.S.”) represented by Shartsis Friese LLP, United States.

The Respondent is Carolyn Hull, United States.

2. The Domain Name and Registrar

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

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 25, 2026. On April 28, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 29, 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 (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 29, 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 May 1, 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 May 6, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 26, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 27, 2026.

The Center appointed Kathryn Lee as the sole panelist in this matter on June 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 Complainant designs and produces connectors, fasteners, lateral systems, anchors, concrete repair, construction software, and structural steel used in construction. The Complainant was founded in 1956 and has its headquarters in California, United States, with factories, offices and warehouses across the United States as well in countries such as Australia, China, Denmark, Germany, Japan, Mexico, New Zealand, Taiwan (Province of China), United Kingdom, and Viet Nam. ¹ The Complainant's parent company, Simpson Manufacturing Co., Inc., is traded in the New York Stock Exchange, and had USD 2.3 billion net sales in 2025. The Complainant owns a trademark registration for the STRONG-TIE mark in the United States (U.S. Registration Number 0801188 registered on January 4, 1966) as well as trademark registrations for various forms of the SIMPSON STRONG-TIE mark (i.e., U.S. Trademark Registration Number 3203436 registered on January 30, 2007, and U.S. Trademark Registration Number 5433671 registered on March 27, 2018). The Complainant has also owned and used the domain name <strongtie.com> for its official website since its registration on July 29, 1995.

Based on information provided by the Registrar, the Respondent is an individual with an address in the United States.

The disputed domain name was registered on March 22, 2026, and does not resolve to any website with active content.

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 STRONG-TIE mark in which it has rights since the disputed domain name is identical to the Complainant's mark except that it has the letter "l" instead of "i" which look very similar in lower case letters.

The Complainant also contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant further contends that there is no evidence of the Respondent's use of the "STRONGTLE" name in connection with the disputed domain name nor any evidence that the Respondent has been commonly known by the disputed domain name.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith. Specifically, the Complainant contends that the disputed domain name employs a visual trick to make it appear like the Complainant's mark in order to confuse users into believing that the disputed domain name is that of the Complainant and that it may be used in phishing attacks and other fraudulent activities. The Complainant further contends, without providing any supporting evidence, that the website hosted at the domain employs monetization scripts.

¹Noting in particular the general powers of a panel articulated inter alia in paragraphs 10 and 12 of the Rules, it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)") section 4.8.

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 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 name since the lower case letter "i" used in the disputed domain name is very similar visually to the letter "i" contained in the Complainant's mark.

Further, previous UDRP panels have concluded that a domain name that consists of a common, obvious, or intentional misspelling of a trademark is considered confusingly similar to the relevant trademark for the purposes of the first element and is referred to as typosquatting. [WIPO Overview 3.1](#), section 1.9. Accordingly, the disputed domain name should be viewed as typosquatting and confusingly similar to the Complainant's mark for the purposes of the Policy.

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 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.

The Panel accepts that the disputed domain name could, in principle, correspond to a term or name unrelated to the Complainant. But there is no evidence of the Respondent's use of the term "strongtle", any business, brand, or project called "strongtle" nor any content explaining the independent meaning of the term.

On the other hand, the disputed domain name happens to be nearly identical to the Complainant's STRONG-TIE mark and also to the domain name of the Complainant's official website. Therefore, the Panel finds, on the balance of probabilities and absent any explanation from the Respondent, that the Respondent more likely than not registered the disputed domain name to target the Complainant in bad faith, for example, to carry out a fraudulent scheme.

There is no evidence that the disputed domain name has ever been used. Nonetheless, panels have 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, in particular, in the United States where the Respondent is also located, the failure of the Respondent to submit a response, the typosquatted nature of the disputed domain name which is also nearly identical to the domain name for the Complainant's official website, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

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 <strongtle.com> be transferred to the Complainant.

/Kathryn Lee/

Kathryn Lee

Sole Panelist

Date: June 16, 2026