ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Rheem Manufacturing Company v. David Quinones, All Points West
Case No. D2026-2560

1. The Parties

The Complainant is Rheem Manufacturing Company, United States of America ("United States"), represented by Eversheds Sutherland (US) LLP, United States.

The Respondent is David Quinones, All Points West, United States.

2. The Domain Name and Registrar

The disputed domain name <rheem.media> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 11, 2026. On June 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 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 (Domains by Proxy LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 15, 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 June 15, 2026.

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 June 18, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 8, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 13, 2026.

The Center appointed William F. Hamilton as the sole panelist in this matter on July 24, 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 manufacturer of commercial and residential air and water heating and cooling equipment and has used the trademark RHEEM in commerce since as early as 1930. The Complainant owns numerous United States trademark registrations for the RHEEM trademark (the "Mark"), including Registration No. 669287, registered November 4, 1958, and Registration No. 671120, registered December 16, 1958, for water heaters and related goods, together with a number of further word and design registrations for the Mark issued between 2005 and 2024 covering heating, ventilating, and air conditioning goods, among other products (Annex 3 to the Complaint). The Complainant also holds registrations for the Mark in numerous other jurisdictions, including registrations designated under the Madrid Protocol.

The Complainant has operated a website at <rheem.com> since July 26, 1995, through which it markets its air and water heating and cooling products and services (Annex 4 to the Complaint).

The disputed domain name was registered on January 29, 2026. The disputed domain name resolves to a website styled as a business news portal operating under the name "Biz360." The website prominently displays, in its header, a circular device mark consisting of the word "Rheem" in stylized script encircled by a ring, matching the Complainant's registered design mark, Registration No. 3025013 (Annexes 3 and 5 to the Complaint).[1] The purported news content on the website consists of placeholder "lorem ipsum" text rather than substantive articles (Annexes 7 and 8 to the Complaint), and the contact details listed on the website, including a listed telephone number and email addresses ending in "@info.com," do not correspond to any identifiable business (Annex 9 to the Complaint).

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 contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name. The Complainant contends that it holds long-standing rights in the Mark through its registered trademarks and its decades of use in commerce, and that the disputed domain name is identical to the Mark. The Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name, noting that the website to which it resolves displays the Complainant's logo alongside placeholder content and fabricated contact information, and that the Respondent has not been authorized to use the Mark in any capacity. The Complainant further contends that the disputed domain name was registered and is being used in bad faith, given the Respondent's evident knowledge of the Mark, the reproduction of the Complainant's logo on the website, and the Respondent's apparent effort to conceal its identity through false contact details.

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.

[1]The Panel visited the website associated with the disputed domain name on August 2, 2026, and confirms that the same circular design also appears as the website's favicon. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 4.8.

The Complainant has shown rights in respect of the Mark for purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The disputed domain name incorporates the Mark in its entirety, together with the ".media" generic Top-Level Domain ("gTLD"). The gTLD is disregarded for purposes of comparison under the first element, as it is a technical requirement of registration. WIPO Overview 3.1, section 1.11.1. Accordingly, the disputed domain name is identical to the Mark for 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 the 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 disputed 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.

The Respondent is using the disputed domain name to display the Complainant's registered logo on a website that otherwise consists of placeholder content and fabricated contact details, in a manner that falsely suggests affiliation with the Complainant. Such use does not constitute a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy, nor a legitimate noncommercial or fair use under paragraph 4(c)(iii) of the Policy. WIPO Overview 3.1, section 2.5.2. Panels have held that the use of a domain name for impersonation or passing off can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1. Also, the Panel considers that the composition of the disputed domain name carries a high risk of implied affiliation. WIPO Overview 3.1, section 2.5.1.

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.

The disputed domain name reproduces the Mark in its entirety and was registered more than 60 years after the Complainant's earliest United States trademark registration and more than 30 years after the Complainant began operating its website at "www.rheem.com." The Respondent's use of a design closely matching the Complainant's registered logo, including the ® symbol, on the website to which the disputed domain name resolves demonstrates that the Respondent had actual knowledge of the Mark at the time of registration. WIPO Overview 3.1, section 3.2.2.

By using the disputed domain name to display the Complainant's logo on a website falsely suggesting affiliation with the Complainant, the Respondent has intentionally attempted to attract Internet users to its website by creating a likelihood of confusion with the Mark as to the source, sponsorship, affiliation, or endorsement of the website. This constitutes bad faith registration and use under paragraph 4(b)(iv) of the Policy. WIPO Overview 3.1, section 3.4. The fabricated contact information provided on the website further supports a finding of bad faith.

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

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 <rheem.media> be transferred to the Complainant.

/William F. Hamilton/
William F. Hamilton
Sole Panelist
Date: August 5, 2026