

ADMINISTRATIVE PANEL DECISION

Consumer Reports, Inc. v. tan shaozhi tan shaozhi, tan shaozhi
Case No. D2026-3008

1. The Parties

The Complainant is Consumer Reports, Inc., United States of America ("United States"), represented by Cozen O'Connor, United States.

The Respondent is tan shaozhi tan shaozhi, tan shaozhi, China.

2. The Domain Name and Registrar

The disputed domain name <consumerreports.blog> is registered with Porkbun LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 8, 2026. On July 9, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 10, 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 (Private by Design, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 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 July 14, 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 July 17, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 6, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 7, 2026.

The Center appointed Pablo A. Palazzi as the sole panelist in this matter on August 13, 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 non-profit organization, located in the United States, which offers a range of print and digital publications relating to consumer product testing and reviews, provided under the name and trademark CONSUMER REPORTS.

The Complainant is the owner of several United States trademark registrations for the mark CONSUMER REPORTS, including, for example:

- United States trademark registration number 672849 for the word mark CONSUMER REPORTS, registered on January 20, 1959, in International Class 16, recording a first use date in commerce of June 1, 1942; and
- United States trademark registration number 5064394 for the word mark CONSUMER REPORTS, registered on October 18, 2016, in International Classes 9, 35, and 41.

The Complainant operates a website at “www.consumerreports.org”.

The disputed domain name was registered on July 12, 2024.

The disputed domain name resolves to a website titled “ConsumerReports.Blog” that contains numerous purported reviews and recommendations of consumer products. The footer carries a disclaimer “This website [...] has no connection with the ‘ConsumerReports’ brand”.

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.

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.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the 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 contends that, although the website associated with the disputed domain name displays a disclaimer stating that it is not affiliated with Consumer Reports, Inc., such disclaimer does not prevent Internet user confusion. According to the Complainant, the website purports to provide independent testing and reviews of consumer products, but in fact operates as an affiliate marketing site that directs users to Amazon and earns commissions from resulting sales. The Complainant further argues that these reviews are not unbiased but are designed to encourage purchases and generate affiliate revenue. Accordingly, the Respondent is allegedly using the CONSUMER REPORTS mark and its goodwill to attract Internet users for commercial gain, rather than making a bona fide offering of goods or services or a legitimate noncommercial or fair use under paragraph 4(c) of the Policy. The Complainant therefore submits that the Respondent has no rights or legitimate interests in the disputed domain name.

The Panel visited the website to which the disputed domain name resolves and was able to verify that it contains numerous purported reviews and recommendations of consumer products (e.g. Hydrogen Water bottle, copper hoses, barefoot shoes, handheld chainsaws, etc.).¹ The website also includes product descriptions and links inviting Internet users to purchase the reviewed products. When following such links, users are redirected to product pages on Amazon. The Panel therefore finds that the website is being used, at least in part, to direct Internet users interested in consumer product reviews to third-party commercial websites, and as such operates as an affiliate marketing site.

The Panel finds that Respondent’s use of the disputed domain name does not give rise to rights or legitimate interests under paragraph 4(c) of the Policy.

The Panel acknowledges that the disputed domain name is composed of ordinary English terms. However, the Respondent registered a domain name identical to the Complainant’s trademark and nearly identical (save for the Top-Level Domain) to the Complainant’s domain name <consumerreports.org> which the

¹ Noting 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, in particular to affirm or corroborate a party’s contention. [WIPO Overview 3.1](#), section 4.8.

Complainant and its predecessors have been using since 1998.² The Respondent is using the Complainant's CONSUMER REPORTS trademark to operate what purports to be an independent consumer-review blog according to its disclaimer (thus overlapping with the very field in which the Complainant has used its mark for decades).

However, the evidence shows that the website contains purported product reviews that redirect Internet users to Amazon and other retailers through affiliate links, from which the Respondent likely receives commissions on resulting sales. In these circumstances, the Panel finds it more likely than not that the Respondent specifically targeted the Complainant's mark rather than independently selected the disputed domain name for any descriptive value.

Accordingly, the Respondent's use is plainly commercial in nature and seeks to capitalize on the goodwill and reputation associated with the Complainant's mark in order to attract Internet users to its website and generate affiliate revenue. The presence of a small font disclaimer at the bottom stating that the website is not affiliated with the Complainant does not, in the circumstances of this case, transform such use into a bona fide offering of goods or services or a legitimate noncommercial or fair use. The Panel therefore concludes that Respondent has no rights or legitimate interests in the disputed domain name within the meaning of paragraph 4(a)(ii) of the Policy.

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 finds that the Complainant has demonstrated the Respondent's bad faith registration and use of the disputed domain name. The Complainant's rights in its CONSUMER REPORTS marks predate by more than 60 years the registration of the disputed domain name. The disputed domain name is identical to the Complainant's CONSUMER REPORTS mark in its entirety. UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith on the part of the Respondent. See [WIPO Overview 3.1](#), section 3.1.4.

The Panel finds that the disputed domain name was registered and is being used in bad faith. The composition of the disputed domain name, which incorporates the Complainant's CONSUMER REPORTS mark in its entirety and is nearly identical to the Complainant's own domain name, coupled with the content of the associated website, indicates that the Respondent was aware of the Complainant and its trademark when registering the disputed domain name. Indeed, the website expressly refers to the Complainant and purports to offer consumer product reviews similar to those for which the Complainant is known.

The Respondent uses this association to attract Internet users to its website and then redirect them, through affiliate links, to Amazon, likely receiving commissions from resulting purchases. In these circumstances, the Panel considers that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website, within the meaning of paragraph 4(b)(iv) of the Policy.

The disclaimer displayed on the website does not cure the Respondent's bad faith. As noted in section 3.7 of the [WIPO Overview 3.1](#), where the overall circumstances of a case point to the respondent's bad faith, the mere existence of a disclaimer cannot cure such bad faith; indeed, panels may consider the use of a disclaimer as an admission that Internet users may be confused.

² www.web.archive.org/web/19981111184936/http://www.consumerreports.org/

Accordingly, the Panel finds that the disputed domain name was registered and is being used in bad faith.

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 <consumerreports.blog> be transferred to the Complainant.

/Pablo A. Palazzi/

Pablo A. Palazzi

Sole Panelist

Date: August 26, 2026