

ADMINISTRATIVE PANEL DECISION

Shenzhen Reo-link Digital Technology Co., Ltd. v. Goras Stefan
Case No. DRO2025-0008

1. The Parties

The Complainant is Shenzhen Reo-link Digital Technology Co., Ltd., China, represented by Chofn Intellectual Property, China.

The Respondent is Goras Stefan, Romania, self-represented.

2. The Disputed Domain Name and Registrar

The disputed domain name <reolink.ro> (the “Disputed Domain Name”) is registered with ROTLD (the “Registry”).

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on September 12, 2025. On September 12, 2025, the Center transmitted by email to the Registry a request for registrar verification in connection with the Disputed Domain Name. On September 15, 2025, the Registry 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 Person) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 23, 2025, providing the registrant and contact information disclosed by the Registry, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint in English on September 25, 2025.

On September 23, 2025, the Center informed the Parties in Romanian and English, that the language of the Registration Agreement for the Disputed Domain Name is Romanian. On September 25, 2025, the Complainant requested that the proceedings be conducted in English. The Respondent did not submit any comment on the Complainant’s submission.

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 in Romanian and English of the Complaint, and the proceedings commenced on September 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 19, 2025. The Response was filed with the Center on October 9, 2025.

The Center appointed Marilena Comanescu as the sole panelist in this matter on November 6, 2025. 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, founded in 2014, operates in the field of design, production and sales of security products. The Complainant's main products are WiFi cameras, battery 4G cameras, dual-lens security cameras and security camera systems.

The Complainant's sales network covers online platforms such as Amazon, eBay, Timeless, along with the Complainant's official website located at the domain name <reolink.com>, as well as an offline sales network. According to data from the traffic analytics platform SimilarWeb, the Complainant's official website had an average monthly visit volume of 2.5 million as of September 2024.

Evidence of search popularity for the Complainant's trademark and goods as of beginning of 2016, including in Romania, is also provided as evidence to the Complaint, as well as evidence of the Complainant's products sold in Romania through Amazon in the first quarter of 2023.

The Complainant has obtained several industry awards and has actively participated in various international exhibitions.

The Complainant owns trademark registration for REOLINK, such as the European Union trademark registration number 015068778 for REOLINK (figurative), filed on February 3, 2016, registered on May 17, 2016, covering goods in International class 9.

The Disputed Domain Name was registered on April 28, 2023, and, at the time of filing of the Complaint, it was not actively used, resolving to an error page.

The Respondent is a physical person located in Romania.

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 REOLINK is its corporate name and core product trademark and, through actual use and promotion for many years and has become highly recognisable in the world; the Disputed Domain Name is identical or confusingly similar to the Complainant's REOLINK trademark because it completely incorporates it.

The Respondent has no rights or legitimate interests in the Disputed Domain Name mainly since the Respondent has no trademark rights in the name "Reolink", and the Complainant has never directly or indirectly authorized the Respondent to use the trademark REOLINK and the corresponding domain names.

The Respondent has registered and is using the Disputed Domain Name in bad faith, since the Disputed Domain Name was registered long after the Complainant had acquired the REOLINK trademark rights, extensive use has made the REOLINK trademark highly recognisable, and the term “reolink” itself does not correspond to any word in common use in English or any other language; further, failure to use a domain name (including blank or “coming soon” pages) does not prevent a finding of bad faith under the passive holding doctrine, and also has the direct effect of preventing the Complainant from reflecting its name in a corresponding domain name, having the same combination of letters.

B. Respondent

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the Disputed Domain Name.

Notably, to the extent relevant for this Decision, the Respondent contends the following:

- the Disputed Domain Name was not chosen to imitate or take advantage of the Complainant's trademark, since the word “reolink” represents a generic combination of terms meaning “regional online link”;
- the Respondent selected the Disputed Domain Name to for a local Internet distribution project in Iasi County, Romania, completely unrelated to the Complainant's field of business and therefore the Respondent holds a legitimate interest in the Disputed Domain Name, as it was intended for use in a future local business distinct from the Complainant's activities;
- the Respondent did not register the Disputed Domain Name in bad faith as, at the time of its registration, the Respondent was not aware of the Complainant or its trademark. The choice of the Disputed Domain Name was based solely on the generic and descriptive nature of the term “Regional Online Link”;
- the Disputed Domain Name was not used in bad faith since it has never been used in a way that could cause confusion with the Complainant's products (security cameras, surveillance systems, or electronics), the Respondent has never offered the Disputed Domain Name for sale, either directly or indirectly, nor used it for commercial gain or misleading purposes; in fact, the Disputed Domain Name has never been active, never hosted content related to cameras, surveillance, or similar products, and has not been used to mislead consumers or divert traffic from the Complainant's business.

Two documents were provided to support the Response, both drafted by the Respondent, as follows: one, a one page affidavit to certify the allegations made in the Response, and the second, of two pages, named “Regional Online Link – General Description and Local Project Intention” which mainly states that: the name “reolink” is an abbreviation of “Regional Online Link” meaning “regional online connection”; the purpose of the website under the Disputed Domain Name, registered on April 28, 2023, is “to serve as an informational and technological platform for the “Regional Online Link” initiative”; and in the final 4th paragraph named “Absence of any commercial or conflicting intent”, further alleges “Since its registration, there has been no direct contact with ‘Reolink Digital Technology Co., Ltd.’, and the choice of name was purely coincidental, derived from its descriptive meaning and initials.”

6. Discussion and Findings

Language of Proceedings

The language of the Registration Agreement for the Disputed Domain Name is Romanian. The Complainant requested that the language of the proceedings be English, the Respondent did not comment on the Complainant's request and submitted its Response in English. The Panel is familiar with both Romanian and English. Therefore, the Panel determines under paragraph 11(a) of the Rules that the language of the proceedings shall be English.

Under the Policy, the Complainant is required to prove on the balance of probabilities that:

- (i) the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in the Disputed Domain Name; and
- (iii) the Disputed Domain Name has been registered and is being used in bad faith.

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 Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), 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 3.0](#), 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 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 3.0](#), 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 Respondent asserts that he adopted the name "reolink" for the Disputed Domain Name based on its "generic and descriptive meaning", deriving from "regional online link". The Panel notes in this regard that the word "reolink" has no meaning per se in English or Romanian, nor is a common abbreviation¹.

Further, the Respondent claims it intended to use the Disputed Domain Name for a project related to the Internet distribution system in a Romanian county. In this respect, the Panel also notes the Respondent's assertions are somewhat inconsistent, as the Response states that the idea behind the domain name was "to develop a local [I]nternet service brand" operating as "Regional Online Link", whereas the project

¹ See "www.abbreviations.com". For panel's authority to undertake limited factual research into matters of public record, see [WIPO Overview 3.0](#), section 4.8.

description claims that the Disputed Domain Name was intended to be used as a non-commercial platform for: i) showcasing local Internet and communications providers, (ii) facilitating access to information about regional digital projects, and (iii) hosting educational and community-based initiatives for digital transformation.

In any case, if not independently verifiable by the panel, claimed examples of use or demonstrable preparations to use the Disputed Domain Name in connection with a bona fide offering of goods or services cannot be merely self-serving but should be inherently credible and supported by relevant pre-complaint evidence. [WIPO Overview 3.0](#), section 2.2.

The Disputed Domain Name is registered for one year and half, the Respondent relies on mere allegations, and fails to provide any critical to its case evidence of business plan/ business formation-related due diligence/legal advice/correspondence/ and provides no proof that would allow to discern credible signs of pursuit of the business plan, any other demonstrable preparations to use the Disputed Domain Name in connection with the claimed bona fide offering of goods or services.

For all the above, the Panel cannot accept the Respondent's unsupported assertions and concludes that the Respondent has failed to demonstrate any rights or legitimate interests in the Disputed Domain Name.

The Panel also notes that the Disputed Domain Name reproduces exactly the Complainant's distinctive trademark. Noting its above findings and evidence of the Complainant's business operations in Romania, the Panel finds, on balance, that the Respondent has failed to demonstrate that it registered the Disputed Domain Name based on its value as an acronym rather than the goodwill inherent in the Complainant's trademark.

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 notes that the Disputed Domain Name was registered, most likely, in bad faith, with knowledge of the Complainant and its trademark particularly because the Complainant's distinctive trademark predates the registration of the Disputed Domain Name by almost seven years; the presence of Complainant and its mark in Romania, the location of the Respondent, and the composition of the Disputed Domain Name itself, reproducing exactly REOLINK trademark.

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 3.0](#), section 3.2.1.

At the time of filing of the Complaint, the Disputed Domain Name was not connected to any active website.

UDRP panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. Having reviewed the available record, the Panel notes the distinctiveness and international presence of the Complainant's trademark; the composition of the Disputed Domain Names (i.e., exactly reproducing the Complainant's trademark); the Respondent's failure to provide evidence of actual or contemplated good-faith use as presented in section 6.B above, 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. [WIPO Overview 3.0](#), section 3.3.

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 <reolink.ro> be transferred to the Complainant.

/Marilena Comanescu /

Marilena Comanescu

Sole Panelist

Date: November 20, 2025