# Decision for dispute CAC-UDRP-108653

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| Case number | CAC-UDRP-108653 |
| Time of filing | 2026-06-11 09:09:39 |
| Domain names | geekbarpolska.com, geekbarnederland.com, geekbarireland.com, geekbaritalia.com, geekbarsrbija.com, geekbarisrael.com, geekbarnz.com, geekbarphilippines.com |

## Case administrator

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| Name | Olga Dvořáková (Case admin) |

## Complainant

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| Organization | Guangdong Qisitech CO., LTD. |

## Complainant representative

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| Organization | Chofn Intellectual Property |

## Respondents

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| Name | Freya Field |
| Name | Henry Hooper |
| Name | Harley Sykes |
| Name | Scott Russell |
| Name | Shannon Harvey |
| Name | Shannon Field |
| Name | Harrison Pratt |
| Name | Aaron Burns |

OTHER LEGAL PROCEEDINGS

The Panel is not aware of any other legal proceedings which are pending or decided and which relate to the disputed domain names.

IDENTIFICATION OF RIGHTS

The Complainant is the owner of trademarks consisting of the term GEEK BAR in numerous countries. Specifically, the Complainant is the owner of the GEEK BAR trademark under:

Madrid Registration Number 1676896, registered on June 8, 2022;

U.S. Registration Number 6275589, registered on February 23, 2021;

EU Registration Number 018225081, registered on August 26, 2020;

China Registration Number 45380452, effective January 7, 2021.

## FACTUAL BACKGROUND

The disputed domain names: geekbarireland.com, geekbarisrael.com, geekbaritalia.com, geekbarnederland.com, geekbarnz.com, geekbarphilippines.com, geekbarpolska.com, and geekbarsrbija.com were registered with Paknic Private Limited on April 22, 2024.

The websites associated with the domain names offer disposable vape products branded as "Geek Bar". Registrar verification unmasked a shared billing contact ("zhang qiang") for all eight domain names, all using the same registration date.

According to the information on the case file, the Registrar confirmed that the Respondents are the current registrants of the disputed domain names and that the language of the registration agreement is English.

On June 10, 2026, Complainant filed the instant Complaint.

The facts asserted by the Complainant are not contested by the Respondents because no Response was filed.

## PARTIES CONTENTIONS

The COMPLAINANT:

Regarding consolidation, the Complainant submits that the Registrar's verification revealed that all eight disputed domain names share an identical billing contact (zhang qiang, based in Wuhan, Hubei, China), were registered on the exact same date (April 22, 2024) through the same registrar, and follow a uniform "geekbar + country name" naming structure using a shared email infrastructure, and the whois data includes fabricated individual names with corresponding German addresses. Complainant submits that these factors conclusively demonstrate a centralized, coordinated registration scheme under common control and that consolidating the domain names into a single complaint satisfies the principles of efficiency and consistency under the UDRP Rules.

The Complainant asserts that the GEEK BAR brand was founded in 2015 and is now independently operated by the Complainant and that GEEK BAR is among the most popular lines of disposable vape products on the market. The Complainant states that it possesses substantial R&D capacity, with over 100 senior engineers, and that GEEK BAR products are sold in Russia, the United States, the Middle East, Europe, and numerous other countries, providing services to hundreds of millions of users.

The Complainant further contends that the brand has demonstrated strong sales momentum globally, particularly in the UK market, where it has committed £120 million to a new production facility to support UK distribution growth. The Complainant also relies on evidence of influencer partnerships, numerous third-party review videos on YouTube, and historical Google Trends data showing sustained high global search volume for the term "GEEK BAR" over the past five years, particularly prior to the registration of the disputed domain names, as evidence of the brand's international recognition and goodwill.

The Complainant contends that each of the disputed domain names is confusingly similar to its GEEK BAR trademark, as each consists of the trademark in its entirety combined with a geographic descriptor or country identifier (e.g., "polska," "nederland," "ireland," "italia," "srbija," "israel," "nz," "philippines"), and that the generic top-level domain ".com" does not affect this comparison.

The Complainant asserts that the Respondent has no rights or legitimate interests in the disputed domain names because the websites to which they resolve display content highly relevant to the Complainant's core business in a manner that makes it difficult for consumers to distinguish genuine from counterfeit sources, effectively impersonating the Complainant or falsely implying sponsorship or endorsement. The Complainant further contends that the Respondent's websites fail to meet the Oki Data standard (WIPO Case No. D2001-0903) for legitimate resale, as they lack any prominent disclaimer disclosing the absence of a relationship with the Complainant. The Complainant adds that it has never authorized the Respondent to use the GEEK BAR mark, found no trademark rights held by the Respondent in any jurisdiction, and observes that the registrant names disclosed by the Registrar (such as "Harley Sykes," "Shannon Field," and "Scott Russell") appear to be fabricated personas operating under a shared Chinese billing identity.

Regarding bad faith, the Complainant argues that GEEK BAR is a highly distinctive, coined term with no independent meaning, making it implausible that the Respondent selected this designation for eight domain names by coincidence. The Complainant further submits that, because the true billing contact is based in China — the same country in which the Complainant is a well-known enterprise — it is commercially implausible that the Respondent was unaware of the GEEK BAR brand at the time of registration. The Complainant contends that the simultaneous, centrally coordinated registration of all eight domain names through a single billing entity, combined with the use of fabricated WHOIS identities, constitutes a bad faith pattern of conduct aimed at preventing the Complainant from reflecting its mark in corresponding country-specific domain names, within the meaning of paragraph 4(b)(ii) of the Policy. The Complainant further contends that the Respondent's use of the domain names to operate websites mimicking the Complainant's commercial presentation is intended to attract Internet users for commercial gain by creating a likelihood of confusion as to source, sponsorship, affiliation, or endorsement, within the meaning of paragraph 4(b)(iv) of the Policy.

The Complainant contends that the requirements of the Policy have been met and that the disputed domain name should be transferred to it.

THE RESPONDENT

No administratively compliant Response has been filed.

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RIGHTS

The Complainant has, to the satisfaction of the Panel, shown the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy).

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NO RIGHTS OR LEGITIMATE INTERESTS

The Complainant has, to the satisfaction of the Panel, shown the Respondent to have no rights or legitimate interests in respect of the disputed domain names (within the meaning of paragraph 4(a)(ii) of the Policy).

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BAD FAITH

The Complainant has, to the satisfaction of the Panel, shown the disputed domain names have been registered and are being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy).

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PROCEDURAL FACTORS

The Panel is satisfied that all procedural requirements under UDRP were met and there is no other reason why it would be inappropriate to provide a decision.

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PRINCIPAL REASONS FOR THE DECISION

CONSOLIDATION OF THE COMPLAINT

The Panel has considered the Complainant's request for consolidation of the eight disputed domain names pursuant to paragraphs 3(c) and 10(e) of the UDRP Rules. The Panel notes that the disputed domain names were initially registered through a privacy service and that the underlying registrant information only became available following the Registrar's Verification. The Registrar's Verification reveals that all eight disputed domain names share the same billing contact, namely "zhang qiang", with an address in Wuhan, Hubei, China. In the Panel's view, this constitutes persuasive evidence that the disputed domain names are subject to common control. The Panel further notes that all eight disputed domain names were registered on the same date, namely April 22, 2024, through the same registrar. Moreover, notwithstanding the disclosure of different registrant names and associated addresses in Hamburg, Germany through the Registrar Verification, the disputed domain names follow an identical naming pattern, consisting of the Complainant's trademark combined with the name of a country, and are linked to the same email infrastructure. These circumstances, taken together, indicate that the apparent differences in the registrant details do not reflect separate and independent registrants but rather form part of a single coordinated registration scheme. The Panel is therefore satisfied, on the balance of probabilities, that the disputed domain names are under common control and that consolidation is appropriate. The Panel further considers that consolidation will promote procedural efficiency, avoid the risk of inconsistent decisions, and will not result in any apparent prejudice to the Respondent. Accordingly, the Panel grants the Complainant's request for consolidation. Hereinafter the term "Respondent" shall be used collectively to refer to all eight underlying registrants.

THREE ELEMENTS THE COMPLAINANT MUST ESTABLISH UNDER THE POLICY

According to Paragraph 4(a) of the Policy, the Complainant is required to prove each of the following three elements to obtain an order that a disputed domain name should be transferred or cancelled:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;

and

(ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and

(iii) the disputed domain name has been registered and is being used in bad faith.

The Panel has examined the evidence available to it and has come to the following conclusions concerning the satisfaction of the three elements of paragraph 4(a) of the Policy in these proceedings:

(A) THE COMPLAINANT'S RIGHTS AND CONFUSING SIMILARITY OF THE DISPUTED DOMAIN NAMES TO THE COMPLAINANT'S RIGHTS

The first element of the Policy requires the Complainant to have rights to a trademark or service mark which is identical or confusingly similar to the disputed domain name.

The Complainant has submitted extensive evidence of its registered trademark rights in the term "GEEK BAR," including registrations in China, the U.S., the EU, and through the Madrid System, all of which predate the registration of the disputed domain names on April 22, 2024. It is well established that a nationally or regionally registered trademark confers on its owner sufficient rights to satisfy the requirement of standing under the Policy. The Panel finds that the Complainant possesses valid rights in its "GEEK BAR" trademarks.

The top-level domain ("TLD") may usually be ignored for the purpose of determination of identity or confusing similarity between a domain name and the Complainant's trademark as it is a technical requirement of registration (see Paragraph 1.11.1 WIPO Overview of WIPO Panel Views on Selected UDRP Questions ("WIPO Overview 3.1")). Hence the TLD ".com" may be disregarded for the purpose of determining this first element, and only the second-level portion of the disputed domain names shall be considered.

The Panel further notes that the disputed domain names consist of the Complainant's "GEEK BAR" mark reproduced in its entirety combined with various geographic descriptors (e.g., "polska," "nederland," "ireland"). It is a consensus view among UDRP panels that where a relevant trademark is recognizable within a disputed domain name, the addition of other terms, whether descriptive or geographic, does not prevent a finding of confusing similarity (see Paragraph 1.8, WIPO Overview 3.1).

The Panel concludes that the disputed domain names are confusingly similar to the Complainant's "GEEK BAR" marks. Accordingly, the Complainant has satisfied the first element of the Policy.

(B) THE RESPONDENT'S LACK OF RIGHTS OR LEGITIMATE INTERESTS IN THE DISPUTED DOMAIN NAME

The second element of the Policy requires that the Complainant establish that the Respondent has no rights or legitimate interests in the disputed domain names. The generally adopted approach by UDRP panels is that if a complainant makes out a prima facie case, the burden of proof shifts to the respondent to rebut it (see Section 2.1, WIPO Overview 3.1) ("...panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the often impossible 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.").

If the Respondent fails to rebut a satisfactory prima facie case, the Complainant is deemed to have satisfied paragraph 4(a)(ii) of the Policy.

Here, the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests. The Respondent is not commonly known by the disputed domain names, nor have they been authorized, licensed, or otherwise affiliated with the Complainant in any capacity. Furthermore, the Registrar verification reveals that the Respondent used apparently fabricated individual names and related German addresses in Hamburg, while being controlled by a single billing entity in China, which supports a finding that the Respondent lacks legitimate interests.

Paragraph 4(a)(ii) of the Policy contemplates an examination of the available facts to determine whether a respondent has rights or legitimate interest in the domain name. Paragraph 4(c) sets out a list of circumstances through which a respondent may demonstrate that it does have such rights or interests.

The first circumstance, under Paragraph 4(c)(i), is where "before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services". Here, screenshot evidence shows that the disputed domain names resolve to websites that replicate the Complainant's brand profile and offer identical or highly similar disposable vape products. By fully adopting the "GEEK BAR" trademarks and presenting a layout identical to an official platform, the Respondent actively creates a false impression of endorsement. The Panel finds no evidence of a bona fide offering of goods or services, as the websites are inherently misleading.

The second circumstance, under Paragraph 4(c)(ii), concerns cases where the respondent is commonly known by the domain name. Here, according to the Registrar Verification, the Respondent is purportedly composed of individuals all located in Hamburg, Germany with names such as "Harley Sykes," "Shannon Field," and "Scott Russell," which have no similarity or connection to the disputed domain names. There is no evidence that the Respondent is commonly known by the disputed domain names. As such, this second circumstance of legitimate rights or interests under the Policy is not applicable to the Respondent.

Regarding the third circumstance, under Paragraph 4(c)(iii) of the Policy, there is no evidence that the Respondent is making a legitimate non-commercial or fair use of the disputed domain names, without intent for commercial gain to misleadingly divert consumers or to tarnish the Complainant's GEEK BAR trademark. According to the evidence submitted, the disputed domain names direct to websites where the Complainant's GEEK BAR trademarks are displayed and offered for sale. Additionally, none of the accepted categories of fair use (such as news reporting, commentary, political speech, education etc.) are found to apply and the Panel concludes there is no legitimate non-commercial or fair use on the part of the Respondent.

The Panel notes that the disputed domain names are identical to the Complainant's GEEK BAR trademark, which it considers to be an invented term with no meaning in commerce related to vaping and e-cigarettes apart from identifying the Complainant's product. Given this, the domain names present a high risk of implied affiliation with the Complainant when used in connection with vaping and e-cigarette products, see section 2.5.1 WIPO Overview 3.1 ("...domain names identical to a complainant's trademark carry a high risk of implied affiliation"). Accordingly, the Panel finds the domain names to be inherently misleading in this context.

Moreover, the present case fails the "Oki Data test" for establishing legitimate interest as set out in Oki Data Americas, Inc. v. ASD, Inc., WIPO Case No. D2001-0903. Where the four Oki Data criteria in the "Oki Data test" are cumulatively satisfied, a respondent—such as a reseller or independent service provider—may be able to establish rights or legitimate interests in a domain name incorporating the complainant's trademark. However, meeting the "Oki Data test" is challenging where the domain name itself is inherently misleading and a failure to satisfy one criterion will often lead to the conclusion that the use is bona fide.

Most relevantly, the third Oki Data criterion requires that the website accurately and prominently disclose the registrant's relationship (or lack of relationship) with the trademark owner. In the present case, the Panel finds no evidence that the Respondent's websites contain any such disclosure. Rather, the content of the websites expressly and strongly suggests an affiliation with the Complainant, including through the prominent use of the Complainant's trademarks and product imagery. In the absence of any disclaimer or other explanation clarifying that no relationship exists between the Respondent and the Complainant, the Panel finds that the Respondent has failed to establish rights or legitimate interests as a reseller.

As a final point, the Complaint states that the Respondent is not licensed, nor has any relationship with or authority to represent the Complainant in any way.

Accordingly, the Complainant has sufficiently made out its prima facie case on the second element of the Policy. Thus, the burden of proof is shifted to the Respondent to rebut the Complainant's case. Here, because the Respondent has not participated in these proceedings, there is no such rebuttal to consider, and the Complainant prevails.

The Panel therefore concludes that neither the Respondent nor the evidence establishes that the Respondent has any right or legitimate interest in the disputed domain name. The Complainant has therefore also satisfied the requirement under paragraph 4(a)(ii) of the Policy.

(C) BAD FAITH REGISTRATION AND USE OF THE DISPUTED DOMAIN NAMES

The third element requires the Complainant to show that the disputed domain names have been registered and used in bad faith under paragraph 4(a)(iii) of the Policy. Further, Paragraph 4(b) of the Policy sets out four circumstances, in particular but without limitation, any one of which may be evidence of the registration and use of a domain name in bad faith. The four specified circumstances are:

(i) circumstances indicating that the respondent has registered or acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of the respondent's documented out-of-pocket costs directly related to the domain name; or

(ii) the respondent has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that the respondent has engaged in a pattern of such conduct; or

(iii) the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to the respondent's website or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the respondent's website or location or of a product or service on the site or location.

The Registrar Verification establishes that the Respondent registered all eight disputed domain names on the exact same date, April 22, 2024, through a single centralized billing entity, while deploying fabricated WHOIS data to mask their identities. This pattern of conduct, specifically the coordinated bulk registration of multiple domain names targeting the Complainant's trademark, demonstrates an attempt to prevent the Complainant from reflecting its mark in corresponding domain names, pursuant to Paragraph 4(b)(ii) of the Policy.

Furthermore, the Respondent's use of the domain names, which are directing users to websites that mimic the Complainant's branding and offer products, makes it evident that the domain names were registered with actual knowledge of the Complainant's GEEK BAR trademarks. By failing to clearly disclose that they have no commercial affiliation with, nor are authorized by, the Complainant, the Respondent improperly implies such authorization to attract Internet users for commercial gain.

This conduct constitutes an attempt to unfairly benefit from the Complainant's GEEK BAR trademarks and amounts to bad faith under the Policy. Specifically, the Panel finds that the Respondent has intentionally attempted to attract Internet users to the websites associated with the disputed domain names for commercial gain by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of the website or the products offered on it (see paragraph 4(b)(iv) of the Policy).

In these circumstances the Panel finds that the disputed domain names have been registered and are being used in bad faith.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

AND THE DISPUTED DOMAIN NAME(S) IS (ARE) TO BE

1. **geekbarpolska.com**: Transferred
2. **geekbarnederland.com**: Transferred
3. **geekbarireland.com**: Transferred
4. **geekbaritalia.com**: Transferred
5. **geekbarsrbija.com**: Transferred
6. **geekbarisrael.com**: Transferred
7. **geekbarnz.com**: Transferred
8. **geekbarphilippines.com**: Transferred

## PANELLISTS

| | |
|---|---|
| Name | **Claire Kowarsky** |

DATE OF PANEL DECISION 2026-07-10

Publish the Decision