



CANADIAN INTERNATIONAL INTERNET DISPUTE RESOLUTION CENTRE
DOMAIN NAME DISPUTE
ADMINISTRATIVE PANEL
DECISION

CIIDRC case number:	26320-CDRP	Decision date: February 17, 2026
Domain Name:	hototools.ca	
Panel:	Steven M. Levy, Esq.	
Complainant:	Shanghai HOTO Technology Co., Ltd.	
Complainant's representative:	Zhang Lei of Chofn Intellectual Property	
Registrant:	Lynn Shen	

1. PROCEDURAL HISTORY

1.1. This administrative proceeding is conducted pursuant to the Canadian Dispute Resolution Policy (the CDRP) and the Canadian Dispute Resolution Rules (the Resolution Rules) of the Canadian Internet Registry Authority.

1.2. This administrative proceeding concerns the domain name <hototools.ca>.

1.3. The disputed domain name <hototools.ca> was registered on November 5, 2025.

1.4. The procedural history of this case was set out in a letter from CIIDRC to the Panel (defined below) as follows:

- On December 17, 2025, counsel for the Complainant, Mr. Zhang Lei, filed a Complaint on behalf of Shanghai HOTO Technology Co., Ltd., pursuant to the CDRP and the Resolution Rules. The required commencement fee was paid on December 22, 2025. The complaint was in administrative compliance with CIRA's requirements under Rule 3.2.

- On December 23, 2025, CIRA was notified of this proceeding and on December 1, 2025, CIRA transmitted by email to CIIDRC its verification response informing that the Registrant of the Disputed Domain Name is Lynn Shen (the “Registrant”). CIRA also confirmed that the disputed domain name was placed on a Registrar LOCK and that the Domain Name has a Registration Date of November 5, 2025 (the “Registration Date”).
- Pursuant to Resolution Rule 4.4, CIIDRC notified the Registrant of this administrative proceeding and forwarded a Notice of Complaint along with the Complaint to the Registrant on January 5, 2026.
- On January 6, 2026, the Complainant’s counsel filed an amended Complaint based on the Registrant’s information provided by CIRA.
- The Registrant failed to file a response to date.
- The Complainant in this administrative proceeding has elected for a Panel consisting of a single-member.
- The Complaint deposited the required Panel fee on February 6, 2026.
- On February 13, 2026, CIIDRC appointed the Panel of the CDRP administrative proceedings, consisting of Steven M. Levy (the “Panel”).

1.5. The Panel finds that it was properly constituted. The Panel has submitted its Statement of Acceptance and Declaration of Impartiality and Independence, as required by CIIDRC to ensure compliance with the Resolution Rules.

2. FACTS ALLEGED BY THE PARTIES

Founded in 2016, the Complainant’s principal business focuses on the design and manufacture of innovative home-use tools, modern lifestyle tools, and intelligent, compact electric devices. Its product portfolio includes electric screwdrivers, cordless cleaning devices, air pumps, rotary tools, multi-function toolkits, and related lifestyle accessories. The company positions itself as design-driven, emphasizing minimalist industrial aesthetics, portability, and user-centric engineering. The company maintains an international presence with offices or service facilities in Shanghai, the United States, Japan, and Hong Kong. HOTO products have reached a user base numbering in the millions and are available in over 50 countries worldwide. The domain name <hototools.com> is the address for Complainant’s official website and the HOTO name is the subject of various trademark registrations around the world including Canadian Intellectual Property Office (“CIPO”) Reg. No. TMA1284879, dated January 17, 2025 and Madrid Reg. No. 1615219, dated August 13, 2021 and designating Canada.

The disputed domain name <hototools.ca> was registered by the Respondent on November 5, 2025. The disputed domain name resolves to a Registrar landing page on which it is offered for sale at a price of USD 8,000.

3. CONTENTIONS OF THE PARTIES

- **Complainant**

Complainant submits that the disputed domain name is confusingly similar to its trademark as it includes the exact word “HOTO” along with the generic word “tools” which directly relates to the Complainant’s field of business.

The disputed domain name was registered in bad faith as the Respondent had prior knowledge of the Complainant’s trademark and it is seeking to sell the domain name to for USD 8,000 which is in excess of its actual costs in registering the domain name.

The Respondent has no rights or legitimate interests in the disputed domain name where it resolves to a for-sale website, it has no relevant trademark rights, it is not commonly known by the disputed domain name, and it is not authorized to use the HOTO mark.

- **Registrant**

The Registrant has not submitted a Response or made any other submission in this case.

- **Remedy Sought**

The Complainant requests that the disputed domain name be transferred to it.

4. DISCUSSION AND FINDINGS

4.1 Eligibility

The Complainant is an eligible complainant under paragraph 1.4 of the CDRP. The Complaint relates to a trademark registered with the CIPO and the Complainant is the owner of such trademark.

4.2 Requirements

In accordance with Paragraph 4.1 of the CDRP, the onus is on the Complainant to prove that:

- (a) the Domain Name is Confusingly Similar to a trademark or service mark in which the Complainant had rights prior to the date of registration of the Domain Name and continues to have such Rights:
- (b) the Domain Name has been registered in bad faith.

and the Complainant must provide some evidence that:

- (c) the Registrant has no legitimate interest in the Domain Name.

The Panel will consider each of these requirements in turn.

4.3 Analysis

4.3.1 Whether the Domain Name is Confusingly Similar to a Mark in which the Complainant has Rights

Paragraph 1.4 of the Policy requires that in order to initiate a complaint, the complainant must either satisfy the Canadian Presence Requirements or be the owner of a trademark registered in the CIPO. Further, Paragraph 4.1(a) of the Policy requires that a Complainant have rights in its asserted trademark. Evidence of a CIPO registration has been held to satisfy both the Paragraph 1.4 and 4.1(a) requirements. *See, e.g., Ben Moss Jewelers v. Don Finch*, 22184-CDRP (CIIDRC January 29, 2024). Here, Complainant has submitted copies of its CIPO and WIPO trademark registration certificates and, from this, the Panel determines that the Complainant has rights in the asserted HOTO trademark.

Next, Complainant asserts that the disputed domain name is confusingly similar to its asserted trademark as the only difference is the addition of a generic term and a TLD. Such changes are typically insufficient to avoid confusion under Paragraph 4.1(a) of the Policy which directs that the Panel shall only consider whether the domain name so nearly resembles the mark in appearance, sound or the ideas suggested by the mark as to be likely to be mistaken for the mark. *ITG Cigars Inc. v. Danhill asu*, 22261-CDRP (CIIDRC January 18, 2024) (domain name *backwoodcigars.ca* found confusingly similar despite the addition of the generic word “cigars” to Complainant’s BACKWOODS mark). Complainant here asserts that the HOTO mark is recognizable in the disputed domain name and that adding the word “tools” to the mark does not alleviate confusing similarity. To the contrary, this addition increases the likelihood of confusion as the word describes the primary function of Complainant’s business. The Panel thus finds that Complainant has satisfied Paragraph 4.1(a) of the Policy.

4.3.2 Whether the Registrant Registered the Domain Name in Bad Faith

Paragraph 4.1(b) of the Policy is satisfied when a complainant demonstrates, on a balance of probabilities, that the registrant registered the disputed domain name in bad faith. Inherently prerequisite to a finding of bad faith is some attribution of knowledge of a complainant’s trademark, whether actual or based upon a conclusion that

a registrant should have known of the mark. See *Domain Name Arbitration*, 4.02-C (Gerald M. Levine, Legal Corner Press, 2nd ed. 2019) (“Knowledge and Targeting Are Prerequisites to Finding Bad Faith Registration”); *USA Video Interactive Corporation v. B.G. Enterprises*, D2000-1052 (WIPO December 13, 2000) (claim denied where “Respondent registered and used the domain name without knowledge of Complainant for a *bona fide* commercial purpose.”). See also *WIPO Jurisprudential Overview* 3.0, par. 3.1.1 (when examining whether “circumstances indicate that the respondent’s intent in registering the disputed domain name was in fact to profit in some fashion from or otherwise exploit the complainant’s trademark”, Panels may consider such issues as “the respondent’s likely knowledge of the complainant’s rights”). Here, Complainant asserts that its mark has gained “prominence” and “brand recognition” and “substantial goodwill” such that it is “widely known in Canada”. In support, it submits screenshots from its own website at <hototools.com> along with Google trends results showing extensive results for Canada, Amazon pages offering its products for sale, 2022 and 2025 iF design awards for a number of its products, and it notes that the products have received news coverage on such platforms as CBS, the New York Post, Popular Woodworking, ZD Net, and others. It further asserts that Respondent knew of its mark where it “has engaged in a series of abusive practices by registering multiple country-code top-level domain names corresponding to the HOTO trademark.” On this last point, Complainant submits into evidence the Whois records for the domain names <hototools.fr> (registered on January 14, 2025) and <hototools.us> (registered on March 31, 2025) showing that both are owned by Respondent. Respondent has not participated in these proceedings and so it offers no explanation for its selection of the <hototools.ca> domain name. Upon considering the totality of the evidence presented, the unique combination of Complainant’s distinctive and well-known HOTO mark and the word “tools”, and, particularly, the very close similarity between the disputed <hototools.ca> domain name and the <hototools.com> website address used by Complainant, the Panel finds it highly likely that Respondent was aware of and targeted the mark at the time that it registered the disputed domain name.

Complainant next asserts that Respondent is offering the disputed domain name for sale at a price in excess of its registration costs and is also seeking to prevent Complainant from registering the mark as a domain name where it has engaged in a pattern of cybersquatting activity.

Offering to sell a disputed domain name to a Complainant, or one of its competitors, for a sum in excess of Respondent’s out-of-pocket costs in registering the domain name is specifically enumerated as demonstrating bad faith registration under paragraph 3.5(a) of the CDRP and this has been applied by Panels in appropriate situations. See, e.g., *Captain D’s Enterprises, LLC v. Derek Watts*, 24522-CDRP (CIIDRC March 14, 2025) (bad faith found where “the Disputed Domain Name resolves to a web site that solely advertises the domain name for sale.”) The <hototools.ca> domain name resolves to a Registrar landing page that offers the domain name for sale at a price of USD 8,000., Respondent has not participated in this case to offer any explanation for its actions and, in view of the lack of any evidence of an ongoing business involving the disputed domain name, a generic meaning of the word “Hoto”, or use of the mark by parties other than Complainant, the Panel finds it more likely than not that Respondent registered the disputed domain name in bad faith in an attempt to

sell it to Complainant for an amount in excess of its out-of-pocket registration costs under paragraph 3.5(a) of the CDRP.

Complainant further asserts that Respondent has engaged in a pattern of conduct involving cybersquatted domain names targeting the HOTO mark. Such activity would run afoul of paragraph 3.5(b) of the CDR. *Glaxo Group Limited v. Defining Presence Marketing Group Inc.*, DCA-780-CIRA (CIRA August 26, 2004) (“twelve domain names contain, or are comprised of trade-marks that are the subject of Canadian registration/Official marks owned by third parties.”) As noted above, Complainant provides Whois records for the domain names <hototools.fr> and <hototools.us> showing that these are also owned by Respondent. As such, the Panel finds that Respondent has engaged in a pattern of cybersquatting activity and has sought to prevent Complainant from reflecting its mark in a .ca domain name resulting in a finding that bad faith is further shown under paragraph 3.5(b) of the CDR.

4.3.3 Whether there is Some Evidence that the Registrant has No Legitimate Interest in the Domain Name

Paragraph 4.1(c) of the CDRP states that “[t]o succeed in the Proceeding, the Complainant must prove, on a balance of probabilities, that “the Registrant has no legitimate interest in the domain name as described in paragraph 3.4.” Paragraph 3.4 provides seven examples of scenarios, any one of which, if supported by evidence, could lead to the conclusion that the Registrant has a legitimate interest in the Domain Name. It is to be noted that in paragraphs 3.4(a), (b), (c), and (d), there is a requirement that the Registrant used the Domain Name “in good faith”. Indeed, *Inc. v. Julie Derouin*, DCA-1899-CIRA (CIRA August 28, 2017).

In support of its claim that Respondent has no legitimate interest in the disputed domain name, Complainant asserts that the resolving website is a Registrar landing page that offers the <hototools.ca> domain name for sale thus indicating that Respondent is not making a bona fide use of the domain name. It further claims that it “has conducted a search of the Canadian trademark database and confirmed that the Respondent holds no trademark rights of any kind in relation to the mark ‘HOTO.’”. However, Complainant does not submit any evidence showing the conduct or results of such research. In any event, as noted above, Respondent has offered to sell the domain name to Complainant and there is no evidence of it pursuing any legitimate venture using the HOTO name. From the evidence presented and Respondent’s lack of any response or submission of any claim or evidence that it has rights or legitimate interests in the disputed domain name, the Panel finds no ground upon which to conclude that it has satisfied the requirements of paragraphs 3.4(a), (b), (c), or (d) of the CDRP.

With respect to paragraph 3.4(e) of the CDRP, Whois information is often used to determine whether a respondent is commonly identified by a disputed domain name. *Snap, Inc. v. Daisy Ducharme*, DCA-2189-CIRA (CIRA March 17, 2020) (Panel accepts Complainant’s assertion that “nothing in Respondent’s Whois

information suggests Respondent is commonly known by the Infringing Domain Names.”) Here, the Whois record identifies the Registrant Name as “Lynn Shen” and this does not bear any resemblance to the HOTO mark or otherwise indicate that Respondent is commonly identified by the <hototools.ca> domain name. Further, Complainant states that “the Respondent is neither a distributor nor a commercial partner of the Complainant, and the Complainant has never authorized the Respondent, whether directly or indirectly, to use the HOTO trademark or to register or use any domain name incorporating the HOTO mark.” Based on the presented evidence, the Panel finds no ground upon which to conclude that Respondent is commonly identified by the disputed domain name.

Finally, there is no indication that the disputed domain name is the geographical name of the location of any non-commercial activity and so there is no basis for finding rights or legitimate interests under paragraph 3.4(e) of the CDRP.

In light of the above analysis, Complainant has made a prima facie case which has not been rebutted by Respondent. Thus, by a balance of probabilities, the Panel finds that Respondent does not have any rights or legitimate interests in the disputed domain name under paragraphs 3.1(b) or 4.1(c) of the CDRP.

5 DECISION and ORDER

The Panel finds that the Complainant has satisfied its burden of proof with respect to all three elements of Paragraphs 3.1 and 4.1 of the Policy. For the reasons stated above, and in accordance with Paragraph 4 of the Policy and Paragraph 12 of the Resolution Rules, the Panel orders that the domain name <newrestcatering.ca> be transferred to the Complainant.

Made as of February 17, 2026

SIGNATURE OF PANEL

