



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

CIIDRC Case No:	<b>26407-CDRP</b>	Date: <b>March 6, 2026</b>
Disputed Domain Name:	<b>&lt;reolink.ca&gt;</b>	
Panel:	<b>María Alejandra López García (Chair)</b> <b>R. John Rogers (Co-Panelist)</b> <b>Barry Effler (Co-Panelist)</b>	
Complainant:	<b>Shenzhen Reo-link Digital Technology Co., Ltd.</b>	
Registrant:	<b>Ilia Tchoudinov</b>	

### 1. PROCEDURAL HISTORY

This matter 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.

The procedural history of this case was set out in a letter from the CANADIAN INTERNATIONAL INTERNET DISPUTE RESOLUTION CENTRE (the “CIIDRC”) to the Panel, as follows:

1. On January 6, 2026, the Complainant filed a Complaint with the CIIDRC pursuant to the Canadian Internet Registration Authority (“CIRA”) Domain Name Dispute Resolution Policy (the “CDRP”) and the CIRA Domain Name Dispute Resolution Rules (the “Resolution Rules”).
2. On January 9, 2026, CIRA was notified of this proceeding. On the same date, CIRA transmitted by email to CIIDRC its verification response, informing that the Registrant of the Disputed Domain Name (the “Domain Name”) was Ilia Tchoudinov (the “Registrant”) and providing their contact details. CIRA also confirmed that the Domain Name was placed on a Registrar LOCK.
3. On January 13, 2026, CIIDRC sent an email communication to the Complainant, providing the registrant and contact information disclosed by CIRA, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on January 13, 2026.

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4. On January 13, 2026, CIIDRC, as Service Provider, confirmed compliance of the Complaint with CIRA's requirements under Resolution Rule 3.2 and the commencement of the dispute resolution process.

4. Pursuant to Resolution Rule 4.4, CIIDRC notified the Registrant of this administrative proceeding and forwarded a Notification of Commencement of Proceedings to the Complainant and to the Registrant via email on January 13, 2026.

5. On January 31, 2026, the Registrant submitted its Response to the Complaint.

6. The Complainant selected a Panel of three members. According to paragraph 6 of the Resolution Rules, on February 13, 2026, after clearing for any potential conflicts, CIIDRC appointed the three-member Panel composed of María Alejandra López García as Chair of the Panel, and R. John Rogers, and Barry Effler as panelists.

8. On February 23, 2026, the Panel unanimously issued a Panel Order, seeking clarification concerning the nature of the relationship between the parties at the time of the registration of the disputed domain name, and the reason behind the selection of the disputed domain name by the Registrant.

9. On February 25, 2026, the Complainant submitted its response to the Panel Order. On February 27, 2026, the Registrant provided its response to the Panel Order.

This matter is conducted pursuant to the CDRP and the Resolution Rules of the CIRA.

## **2. FACTS ALLEGED BY THE PARTIES**

The Complainant is a Chinese company, based in Shenzhen and founded on December 29, 2014.

The Complainant has been active in commerce since 2009. As part of its commercial strategy, during the period from 2009 to 2015, the Complainant adopted the Original Design Manufacturer business model, with it, increasing their sales in Europe and the United States, and gradually accumulated capital and system technology innovation platform capabilities.

Between 2015 and 2018, the Complainant progressively transitioned from a traditional manufacturer of wired network cameras into a comprehensive security ecosystem centered on wireless battery-powered devices, cellular network connectivity, and cloud-based services. The Complainant contends and provides evidence that in 2017 and 2018, before the registration of the Domain Name, the name "REOLINK" had already become widely recognized by the relevant public in multiple countries and regions, including Canada.

The Complainant relies on Canadian common law principles recognizing unregistered trademark rights, which principles arise from prior use of a mark in commerce in Canada and provide protection against unauthorized use that is likely to confuse consumers. As well as providing evidence of its use of its common law trademark

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rights in Canada, the Complainant also provided evidence of the following registered trademark rights:

- Canadian trademark for REOLINK (word mark), Reg. No. TMA1061642, in International Class 9; filed on June 12, 2017; registered on November 3, 2019, and in force until November 3, 2029. Claim: "Used in CANADA since at least as early as April 30, 2016, on goods."

The Registrant is Ilia Tchoudinov, an individual located in Ontario, Canada, the owner of a commercial business which was focused on smart home installation and identified online under the domain name <ERMART.com> (the "Registrant's Domain Name"). The Registrant asserts that it registered the disputed Domain Name as a result of an authorized business negotiation between the Parties.

The disputed Domain Name was registered on December 18, 2018, and since its registration, it has redirected internet traffic to the Registrant's domain name <ermart.com>.

### **3. CONTENTIONS OF THE PARTIES**

- **Complainant:**

The Complainant submits that the Domain Name is confusingly similar or identical to the Complainant's trademark REOLINK (the "REOLINK mark") which is used to distinguish the Complainant's products and services. The Complainant had rights in the REOLINK mark prior to the registration of the Domain Name and continues to hold those rights. The Domain Name incorporates the entirety of the REOLINK mark.

The Registrant has no legitimate interest in the Domain Name. The Domain Name has never been used in good faith and is not descriptive or generic. It misleadingly suggests affiliation with the Complainant, and as the Domain Name diverts internet traffic to the Registrant's Domain Name, it has diverted users seeking legitimate products of the Complainant.

The Registrant has intentionally attempted to attract, for commercial gain, Internet users to their website by creating a likelihood of confusion with the Complainant's REOLINK trademark as to the source, sponsorship, affiliation, or endorsement of the website. This behavior aligns with the examples of bad faith outlined in the Policy, including creating confusion for commercial gain and disrupting the Complainant's business.

- **Registrant**

The Registrant submits that they registered the Domain Name in connection with a bona fide intention to use it for the commercial distribution of the Complainant's goods as a part of their smart home installation business, based on active negotiations initiated by the Complainant.

- **Remedy Sought**

The Complainant requests that the disputed domain name be transferred to it. The Registrant did not provide an express request.

#### **4. CONCERNING THE PANEL ORDER**

Pursuant to the provisions of paragraph 9.1 of the Resolution Rules, the Panel unanimously decided on February 23, 2026, to issue a Panel Order to seek clarification from the Parties on the following:

“1. What was the nature of the relationship between the Complainant and the Registrant on December 17, 2018, based upon which relationship, the Registrant, on that date, believed that it was entitled to register the disputed domain name <reolink.ca>? The Panel notes that, according to the evidence provided, the Registrant, who seem to acquire its knowledge via Amazon, contacted the Complainant on December 12, 2018, expressing its interest in the Complainant’s security camera systems for its own projects.

2. (For the Registrant only) Why did the Registrant select <reolink.ca> as a domain name?”

On February 23, 2026, the Complainant in summary asserted that “on December 17, 2018, the relationship between the parties was merely that of a preliminary, unverified business inquiry. There was no formal agreement or authorization that would entitle the Respondent to register the disputed domain name.”

On February 27, 2026, the Registrant, in summary, asserted that “on December 17, 2018, the relationship between the Registrant and the Complainant was that of a prospective authorized distributor engaged in active, good-faith negotiations (....) The Registrant believed they were entitled to register the domain in anticipation of finalizing this mutually beneficial partnership, acting in good faith to prepare the necessary infrastructure for the authorized Canadian distribution discussed with the Complainant.”; that “as the Registrant's business (Ermart) was negotiating to become a distributor and was planning to open a physical retail store in 2019 (as explicitly stated in the correspondence with Reolink), securing the .ca country-code top-level domain was a logical, necessary, and standard business step to establish a regional web presence for the brand. The domain was selected not to misappropriate the Complainant's trademark, but solely to facilitate and promote the sale of Reolink products to Canadian consumers as an intended authorized partner.”

#### **5. DISCUSSION AND FINDINGS**

##### **5.1 Eligibility**

Paragraph 1.4 of the CDRP, establishes that:

“The person initiating a Proceeding (the “Complainant”) must, at the time of submitting a complaint (the “Complaint”), satisfy the Canadian Presence Requirements for Registrants (the “CPR”) in respect of the domain name that is the subject of the Proceeding unless the Complaint relates to a trade-mark registered in the Canadian Intellectual Property Office (“CIPO”) and the Complainant is the owner of the trade-mark.”

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The Complainant is the owner of the REOLINK mark and, therefore the Complainant satisfies the Canadian Presence Requirements under section 1.4 of the CDRP.

## **5.2 Requirements**

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

- (a) the Registrant's dot-ca domain name is Confusingly Similar to a Mark in which the Complainant had Rights prior to the date of registration of the domain name and continues to have such Rights; and
- (b) the Registrant has registered the domain name in bad faith as described in paragraph 3.5; and the Complainant must provide some evidence that:
- (c) the Registrant has no legitimate interest in the domain name as described in paragraph 3.4. Once that is done, the onus shifts to the Registrant to prove, on a balance of probabilities, that the Registrant has a legitimate interest in the domain name as described in paragraph 3.4 of the CDRP.

The Panel will consider each of these requirements in turn.

## **5.3 Analysis**

### **5.3.1 Confusingly Similar**

The Domain Name consists of the REOLINK mark and the country code Top Level Domain ("ccTLD") ".ca". The ".ca" is irrelevant for the purposes of determining confusing similarity. The Panel concludes that the Domain Name is either identical or confusingly similar to the REOLINK mark to which the Complainant had common law trademark rights prior to the registration of the Domain Name.

In this case, the Panel finds that the Complainant has provided sufficient evidence which demonstrates its common law trademark Rights in Canada over the term REOLINK since at least April 2016, being among other, a) the Complainant submitted sales data from the Amazon Canada marketplace covering the period from April 25, 2016, to December 17, 2018, showing that before the registration of the disputed domain name, products sold under the REOLINK trademark on Amazon Canada had generated more than 7,000 cumulative orders; b) Information on Reolink's Indiegogo Crowdfunding Projects during 2017 and 2018; c) Media Reports on Reolink's Participation in IFA and CES from 2017 to 2018; d) Google Trends search data about Reolink between January 1, 2015 and December 1, 2018.

The evidence supports the finding that the Complainant had a Mark as defined in the Policy prior to the registration of the Domain Name.

Therefore, the Panel finds that the Complainant has satisfied the first CDRP requirement.

### **5.3.2 Bad Faith Registration**

According to paragraph 3.5 of the CDRP, for the purposes of paragraphs 3.1(c) and 4.1(b), any of the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence that a Registrant has registered a domain name in bad faith:

- a. the Registrant registered the domain name, or acquired the Registration, primarily for the purpose of selling, renting, licensing or otherwise transferring the Registration to the Complainant, or the Complainant's licensor or licensee of the Mark, or to a competitor of the Complainant or the licensee or licensor for valuable consideration in excess of the Registrant's actual costs in registering the domain name, or acquiring the Registration;
- b. the Registrant registered the domain name or acquired the Registration in order to prevent the Complainant, or the Complainant's licensor or licensee of the Mark, from registering the Mark as a domain name, provided that the Registrant, alone or in concert with one or more additional persons has engaged in a pattern of registering domain names in order to prevent persons who have Rights in Marks from registering the Marks as domain names;
- c. the Registrant registered the domain name or acquired the Registration primarily for the purpose of disrupting the business of the Complainant, or the Complainant's licensor or licensee of the Mark, who is a competitor of the Registrant; or
- d. the Registrant has intentionally attempted to attract, for commercial gain, Internet users to the Registrant'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 Registrant's website or location or of a product or service on the Registrant's website or location.

Given the facts and the evidence submitted by the Parties, where:

- 1) the Complainant owns Canadian common law trademark rights for the REOLINK mark at least since April 2016;
- 2) the Domain Name was registered under the arbitrary and unilateral decision of the Registrant, meaning without the express consent of the Complainant, with it, infringing Complainant's Intellectual Property Rights;
- 3) the Registrant admits that the Domain Name was registered to seek commercial benefit redirecting traffic to it to its own business website; and
- 4) the total absence of a Distribution Agreement between the Parties, the Panel finds that the Registrant conduct has met the definition of bad faith as provided in paragraph 3.5(d) of the CDRP.

Based on all the above, this Panel concludes that the Registrant has registered the disputed domain name in bad faith. Therefore, the Complainant has satisfied the second CDRP requirement.

### **5.3.3 No Legitimate Interest**

According to paragraph 3.4 of the CDRP, for the purposes of paragraphs 3.1(b) and 4.1(c), any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate that the Registrant has a legitimate interest in a domain name:

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- a. the domain name was a Mark, the Registrant used the Mark in good faith, and the Registrant had Rights in the Mark;
- b. the Registrant registered the domain name in Canada in good faith in association with any wares, services or business and the domain name was clearly descriptive in Canada in the English or French language of: (i) the character or quality of the wares, services or business; (ii) the conditions of, or the persons employed in, production of the wares, performance of the services or operation of the business; or (iii) the place of origin of the wares, services or business;
- c. the Registrant registered the domain name in Canada in good faith in association with any wares, services or business and the domain name was understood in Canada to be the generic name thereof in any language;
- d. the Registrant used the domain name in Canada in good faith in association with a non-commercial activity, including, without limitation, criticism, review, or news reporting;
- e. the domain name comprised the legal name of the Registrant or was a name, surname or other reference by which the Registrant was commonly identified; or
- f. the domain name was the geographical name of the location of the Registrant's non-commercial activity or place of business.

In paragraph 3.4(d) "use" by the Registrants includes, but is not limited to, use to identify a web site.

Having reviewed the available record, the Panel finds that the Registrant is not affiliated with the Complainant, nor has been licensed, or even authorized in any manner by the Complainant to register the disputed domain name. The Registrant has no Rights in the REOLINK mark, and is not commonly known by the disputed Domain Name.

Instead, this Panel finds that no factor outlined in paragraph 3.4 fits the circumstances of this case. Given that the Registrant unilaterally decided to register a domain name rooted in a third-party trademark, in this case, the Complainant's REOLINK mark and linked it to its own business as a part of a commercial strategy designed individually without even seeking the Complainant's express consent. In doing so, the Registrant took advantage of the Complainant's work, business, and trademark reputation -as well as its clients and consumers- which cannot constitute, in any manner, a use in good faith in connection with a *bona fide* offering of goods or services or business activity by the Registrant.

In accordance with paragraph 4.1(c) of the CDRP, the Complainant has provided sufficient evidence, succeeding on this requirement.

Therefore, this Panel finds that the Registrant has no legitimate interest in the Domain Name and in consequence, the Complainant has satisfied the third CDRP requirement.

## **6. DECISION and ORDER**

For the above reasons, in accordance with paragraph 4 of the CDRP, paragraph 12 of the Resolution Rules, the Panel orders that the disputed Domain Name <reolink.ca> be transferred to Complainant.

Signed on **March 6, 2026**, by:

*/Maria Alejandra López García/* Chair

*/R. John Rogers/* (Co-Panelist)

*/Barry Effler/* (Co-Panelist)

