



CANADIAN INTERNATIONAL INTERNET DISPUTE RESOLUTION CENTRE

DOMAIN NAME DISPUTE

ADMINISTRATIVE PANEL

DECISION

CIIDRC case number:	27473-CDRP	Decision date: September 20, 2026
Disputed Domain Name:	lynkco.ca	
Panel:	Thomas Manson (Chair), Leslie Maerov, Zak Muscovitch	
Complainant:	ZHEJIANG GEELY HOLDING GROUP CO., LTD.	
Registrant:	QIANG ZHANG	

OVERVIEW

1. This matter concerns a registered domain, <lynkco.ca> (the "Domain Name").
2. This matter is a proceeding under the Canadian Dispute Resolution Policy ("CDRP") and the Canadian Dispute Resolution Rules ("Rules") of the Canadian Internet Registration Authority ("CIRA"). The Canadian International Internet Dispute Resolution Centre ("CIIDRC") is a recognized service provider to the CIRA Domain Name Dispute Resolution Policy (the "Policy") of the Canadian Internet Registration Authority ("CIRA").
3. The Complainant is **ZHEJIANG GEELY HOLDING GROUP CO., LTD.** of Hangzhou, Zhejiang, China.
4. The Registrant is **QIANG ZHANG** of Montreal, Quebec.

PROCEDURAL HISTORY

5. The procedural history of this case is as follows:
6. On July 2, 2026, Raphaëlle Nadon of Fasken Martineau DuMoulin LLP filed a Complaint on behalf of the Complainant, pursuant to the CDRP and the Rules. The Complaint was found to be in administrative compliance with the requirements of the CIRA under Rule 3.2. The required commencement fee was paid on the same date.

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7. CIIDRC notified CIRA of the proceeding on July 2, 2026. On July 3, 2026, CIRA transmitted by email to CIIDRC its verification response, confirming that QIANG ZHANG is the registrant of the Domain Name. CIRA further confirmed that the Domain Name had been placed on Registrar LOCK status.
8. Pursuant to Resolution Rule 4.4, CIIDRC formally notified the Registrant of the present administrative proceeding and forwarded to the Registrant a Notice of Complaint together with a copy of the Complaint on July 8, 2026.
9. On July 27, 2026, the Registrant requested an extension of time to file a Response to the Complaint.
10. In accordance with Paragraph 5.4 of the Resolution Rules, the requested extension was granted. The original deadline for filing the Response was July 28, 2026. The deadline was extended to August 17, 2026.
11. On August 3, 2026, the Registrant submitted a settlement proposal. On August 4, 2026, CIIDRC provided the Parties with a settlement agreement template for their consideration.
12. On August 7, 2026, CIIDRC acknowledged correspondence from Ms. Nadon advising that settlement discussions would not proceed and that the Complainant had elected to continue with the Complaint process.
13. On August 16, 2026, the Registrant filed a Response to the Complaint.
14. On August 20, 2026, Ms. Nadon filed the Complainant's submission in response to the Respondent's claim for costs pursuant to Paragraph 4.6 of the CDRP.
15. The Complainant paid the required Panel fee on August 27, 2026.

Panel Appointment, Impartiality, and Independence

16. CIIDRC named Zak Muscovitch and Leslie Maerov, FCI Arb., as panelists. Thomas Manson, KC, was named as Chair of the Panel. Each member of the Panel has submitted a Statement of Acceptance and Declaration of Impartiality and Independence in accordance with Paragraph 7 of the Rules.
17. The Panel finds that it is properly constituted and has jurisdiction to decide this dispute.

FACTS (ALLEGED BY THE PARTIES)

18. The Complainant is a global automotive group headquartered in Hangzhou, China and the parent and controlling entity of the LYNK&CO automotive brand. That brand was founded in 2016 as a joint venture between Geely Auto Group and Volvo Car Group.

19. The Complainant owns trademarks registered with the Canadian Intellectual Property Office (“CIPO”), which are contained within the Domain Name. A copy of the Canadian trademark registrations was provided as Annex 3. The Complainant is the owner of Canadian trademark registrations for Lynk&CO, both of which are registered in the CIPO as follows:

Registration Number	Type	Filing Date	Registration Date
TMA1,057,953	Word Mark Registered Goods 12 – Motor cars; cars; automobile chassis; motorcycles; engines for land vehicles; ... Registered Services 37 – Motor vehicle maintenance and repair, vehicle repair services, cleaning of vehicles; ...	May 16, 2016	Oct. 8, 2019
TMA1,048,896	Design Mark Registered Goods 12 – Motor cars; cars; automobile chassis; motorcycles; engines for land vehicles; ... Registered Services 37 – Motor vehicle maintenance and repair, vehicle repair services, cleaning of vehicles; ...	Nov. 16, 2016	Aug. 14, 2019

(together, the “**Lynk&CO** Mark”)

20. The Complainant also owns and operates <lynkco.com> (registered in 2016) to promote its automotive brand, which is visited by Canadian residents (see registration details and webpage screenshot, Complaint, Annex 6).
21. The Registrant, an individual, describes themselves as “a Canadian-based professional and business operator actively engaged in diverse commercial ventures.” In particular, the Registrant says that it operates a student guardianship and custodial service, which serves as a vital 'link' for international students navigating their education in Canada.
22. The Domain Name was registered on November 8, 2023.

23. The Domain Name resolves to a landing page (see Complaint, Annex 7) which states, in part:



CONTENTIONS OF THE PARTIES

Complainant

24. The Complainant submits that the Domain Name <lynkco.ca> is confusingly similar to its registered marks. The Domain Name constitutes a near-identical reproduction of the Complainant's registered trademark and creates a likelihood of confusion within the meaning of the CDRP. Further, the Domain Name is an infringement of the Complainant's rights under section 19 of the *Trademarks Act* and a violation of section 20 of the *Trademarks Act*. The Registrant's conduct also contravenes section 22 of the *Trademarks Act*, which protects against depreciation of goodwill.
25. As to bad faith registration, the Complainant says that the Domain Name wholly incorporates the Complainant's mark and is likely intended to attract users seeking official LYNK&CO products or information; and create a false impression of affiliation or endorsement. Such conduct, the Complainant says, constitutes an attempt to violate the Complainant's rights in its registered trademarks, misappropriate goodwill and trade on the Complainant's reputation.
26. Because the **Lynk&CO** Mark is coined and highly distinctive, the registration of a corresponding Domain Name by an unrelated party is inherently suspect and indicative of opportunistic bad faith. Further, the Complainant alleges that the Registrant engages in a broader pattern of registering domain names incorporating well-known third-party trademarks. The Complainant refers to what it describes as a pattern of conduct consistent with serial cybersquatting and supporting an inference of bad faith registration.

Registrant

27. The Registrant refers to the Complainant's lack of a commercial presence in Canada.

28. With respect to “confusing similarity”, the Registrant asserts that their use of 'lynkco' is a logical, non-infringing reflection of their business purpose and emphasizes that the Complainant's automotive manufacturing business and the Respondent's student guardianship services do not intersect. The Registrant argues that it is highly implausible that any reasonable Canadian consumer would confuse a professional student guardianship website with a global automobile manufacturer, as there is no overlap in target demographics, consumer intent, or service categories.
29. As to bad faith, the Registrant argues that the domain name was not registered for the purpose of selling, renting, or transferring it to the Complainant or a competitor; the domain name was not registered to disrupt the business of the Complainant; and the Respondent has never attempted to create consumer confusion or pass off services as being associated with the Complainant. Further, the Registrant argues that the Complainant attempts to cast the Respondent as a 'serial cybersquatter' by referencing other domain names, such as <tsingtao.ca> and that this is a transparent and improper tactic intended to distract the Panel from the specific facts of the case at hand.
30. With respect to legitimate interest, the Registrant says that it has genuine, legitimate rights and interests in the domain name based on active and legal service provision in Canada. The Registrant argues that the Respondent selected and registered the domain name lynkco.ca for a legitimate, logical, and bona fide commercial purpose completely independent of the Complainant's business. Further, the Registrant argues that holding a descriptive or common-term domain name for future commercial planning and strategic development constitutes a legitimate interest under Canadian commercial standards.

Remedy Sought

31. The Complainant requests a decision that registration of the Domain Name be transferred to it.
32. The Registrant submits that the Panel dismiss the Complaint and allow the Registrant to retain the Domain Name.

Costs

33. With respect to costs, the Registrant seeks an order for costs in the amount of \$4,500 (Response, Schedule J). The Registrant asserts that the claim is not merely a request for legal fees, but a necessary compensation for the extraordinary burden imposed upon the Respondent by the Complainant's failure to conduct basic due diligence. They argue that the Complainant's submission contained significant factual errors, most notably the erroneous targeting of unregistered domains and a fundamental misunderstanding of the Respondent's legitimate business operations.
34. In reply, the Complainant requests that the Panel dismiss the Registrant's claim for costs in its entirety and decline to make any award pursuant to Paragraph 4.6 of CDRP. It argues that mere disagreement with the Complaint does not establish bad faith or absence of colour of right.

DISCUSSION AND FINDINGS

1.1 Eligibility

35. To initiate the Complaint, paragraph 1.4 of the CDRP requires that the Complainant at the time of the initiation of the Complaint, must satisfy the Canadian Presence Requirements for Registrants (the “CPR”), unless the Complaint relates to a trademark registered in the Canadian Intellectual Property Office (“CIPO”) and the Complainant is the owner of the trademark. The Complainant satisfies the CPR requirement by owning Canadian trademark registrations for **Lynk&CO** Mark.
36. As such, the Complainant is an eligible complainant under paragraph 1.4 of the CDRP.

1.2 Requirements

37. 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; and
 - (b) the Registrant registered the Domain Name in bad faith.

and the Complainant must provide some evidence that:

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

38. Paragraph 4.1 goes on to state:

“Even if the Complainant proves (a) and (b) and provides some evidence of (c), the Registrant will succeed in the Proceeding if the Registrant proves, on a balance of probabilities, that the Registrant has a legitimate interest in the domain name as described in paragraph 3.4.”

39. The Registrant asserts that the Complainant bears the heavy burden under the CDRP to prove all three cumulative elements. Paragraph 4.1 sets out the *correct* formulation and burden.
40. The Panel will consider each of the requirements in turn.

1.3 Analysis

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

41. In this case, the relevant part of the Domain Name is “lynkco”. The Domain Name thus incorporates the Complainant’s mark “Lynk&CO”, without the ampersand, before the suffix “.ca”. The “lynkco” format for the Domain Name is the same as the Complainant’s “.com” format in <lynkco.com>.

42. In *Skoda Auto v Pcolinsky* CIIDRC 26806-CDRP (March 31, 2026) <skoda-auto.ca> the panel explained (at page 12) with respect to the addition of a hyphen in a well-known trademark: “The presence of the hyphen and similar symbols is disregarded for the purpose of the comparison as they are far too minor to have any real effect.” The same logic applies here with respect to the deletion or omission of the ampersand here.
43. In a CAC decision similar to the present case, *Marks and Spencer plc v Zhang Qiang* CAC-UDRP-108384 (March 12, 2026) <marksandspencerireland.com, and 11 others>, the Panel held that:

The disputed domain names are confusingly similar to the Complainant’s trademark “Marks & Spencer”. Replacing the ampersand “&” with the word “and” is a technical necessity of the domain name system and does not alter the overall character.

44. In another UDRP case, *Marks & Spencer plc v Hongxia Li* WIPO Case No 2022-2613 (Sept 9, 2022) <marksspencershop.com> the Panel stated (at page 3):

Prior UDRP panels have found that a disputed domain name is confusingly similar to a complainant’s trademark where at least a dominant feature of the relevant mark is recognizable in the domain name ... The addition of the term “shop” and the omission of the sign “&” (that is part of the Complainant’s trademark, while not a dominant element) do not prevent a finding of confusing similarity between the disputed domain name and the Complainant’s trademark since the Complainant’s trademark is clearly recognizable in the disputed domain name (see WIPO Overview 3.0 at section 1.8).

45. With respect to the Domain Name, there is no replacement by a word of an ampersand (as in *Marks & Spencer plc* above), nor is there any additional word (such as “shop” in *Hongxia Li*). Likewise, the omission of the “&” in <lynkco.ca> does not alter the overall character and the **Lynk&CO** Mark is clearly recognizable in the Domain Name. The Registrant’s submissions that the parties’ services do not overlap and that no Canadian consumer would confuse them do not assist it. Paragraph 3.3 of the Policy directs the Panel to consider only 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. The confusion factors under section 6 of the *Trademarks Act* do not arise.

Overview of “Confusing Similarity”

46. This Panel finds that the Domain Name is confusingly similar to the Complainant’s **Lynk&CO** Mark as it resembles the Mark as to be mistaken for the Mark in which the Complainant had and continues to have Rights (the registrations having issued in 2019, before the Domain Name was registered in November 2023); the Complainant has satisfied paragraph 4.1(a) of CDRP.

1.3.2 Whether the Registrant registered the Domain Name in Bad Faith

47. To succeed in this proceeding, paragraph 4.1(b) of the CDRP requires the Complainant to demonstrate, on a balance of probabilities, that the Registrant registered the Domain Name in bad faith as described in paragraph 3.5. This provides a “non-exhaustive” list (3.5 (a)-(d)) of circumstances which constitute bad faith. Thus, the list of general criteria for bad faith behaviour is not closed. As with “legitimate interest”, these four “circumstances” are exemplars of certain kinds of behaviour, and thus make possible other acts demonstrating bad faith. (see *General Motors LLC v Thompson*, Res Canada 2012/No. 00191 (May 11, 2012) <chevroletorlando.ca> at para 29). In making a finding of bad faith, reasonable inferences may be drawn from the available evidence; *Workplace Safety and Insurance Board v Dickson*, 18847-CDRP <wsib-on.ca> (Jan. 25, 2023), at paragraph 4.3.3.3.
48. Here, the Complainant makes a general allegation (Complaint, para 46) that “the Registrant registered the domain name in bad faith within the meaning of the CDRP.” The Complainant does not specifically rely on or refer to any of the enumerated instances of bad faith registration in paragraph 3.5.
49. The Complainant’s case on “bad faith” (Complaint, pages 8-9) seems to be that using a highly distinctive mark, uniquely associated with the Complainant’s automotive business:
- The Registrant’s conduct attempts “to violate the Complainant’s rights in its registered trademarks, misappropriate goodwill and trade on the Complainant’s reputation” (para 49); and
 - Because the mark is coined and highly distinctive, the registration of a corresponding Disputed Domain Name by an unrelated party is inherently suspect and indicative of opportunistic bad faith.” (para 50).
50. The Complainant goes on to assert that the Domain Name is “... an instrument designed to mislead Internet users and facilitate parasitic exploitation of the Complainant’s goodwill.” (para 51) and engaging “in a broader pattern of registering domain names incorporating well-known third-party trademarks” (para 52). The latter argument is particularized in part by reference to conduct suggesting “a deliberate pattern of opportunistic registration” without reference to any of the enumerated examples in paragraph 3.5.
51. In support of this allegation, the Complainant provided a list from CIRA of other “.ca” domains owned by the Registrant (Annex 8); these included:

24hrslogistics.ca
 altanex.ca
 narwhaltex.ca
 pinnaclequantech.ca
 stonewool.ca
 tsingtao.ca
 uattrading.ca
 unat.ca

52. In their evidence, the Complaint deals specifically with <tsingtao.ca> and <24hrslogistics.ca> as “domain names incorporating well-known third-party trademarks” (Complaint, para 52). There is no evidence dealing with the other domain names. The Response addresses this with evidence and further argument in Exhibits G (Response to the Complainant’s Fundamental Factual Errors and Confused Evidence *www.24hlogistics vs www.24hrslogistics.ca.*) and H (Complainant attempts to cast the Respondent as a ‘serial cybersquatter’ by referencing other domain names, such as <tsingtao.ca>).
53. Ordinarily, a “pattern” is established by multiple registrations *with* findings (in earlier proceedings) that a registrant with no legitimate interest registered the domains in bad faith; see *Surfshark Holding BV v Bajic* DCA-18783-CIRA <surfshark.ca> (Dec 15, 2022), at para 43, and *London Hydro v Antonia Ojo* CIIDRC-26987-CDRP <londonhydro.ca> (2026-06-14). No similar evidence is found in a mere list of “.ca” domains owned by the Registrant, with no evidence concerning whether the other domain names are unauthorized or closely resemble registered marks, without any legitimate interest; *Yindu Kitchen Equipment Co., Ltd. v Mohammadpour* CIIDRC-27056-CDRP (June 29, 2026) <atosaca.ca>, at page 12. Indeed, in *Canadian Federation of Students-Services v. Nameshield, Inc*, Res Cda 2022-00485 (Nov 14, 2022) <isic.ca>, a decision relied upon by the Complainant, the panel found bad faith registration under paragraph 3.5(b). However, that panel found the requisite pattern of registrations based on a list of domain names owned by the Registrant many of which corresponded to marks registered in Canada to third parties. In addition, the panel in *CFSS* relied on evidence of findings in previous CDRP decisions where panels found that the registrant had engaged in a pattern of registering unauthorized domain names containing third-party trademarks. No such evidence exists here.
54. The Complainant has not established a “pattern” of abusive domain name registration – more than registration of multiple domains is required. Entirely apart from the absence of findings in previous CDRP decisions, the Complainant’s evidence (Annex 11) shows only that TSINGTAO is a beer brand sold in Canada. It does not show that <24hrslogistics.ca> corresponds to any third party’s Mark; the Complainant’s reference to 24hlogistics was misdirected (Response, Exhibit G). One registration corresponding to a third party’s brand does not amount to a pattern. It is unnecessary to decide whether the registration of <tsingtao.ca> was itself abusive. On the evidence before us, the Complainant did not establish that the Registrant was a “serial cybersquatter” and the evidence does not support any finding based on paragraph 3.5(b).

Bad faith, without a pattern of abusive registrations?

55. The absence of proof of a “pattern” does not end the bad faith registration enquiry. Neither “opportunistic bad faith”, nor “parasitic exploitation” of goodwill are addressed specifically in paragraph 3.5 of the CDRP.
56. Inherent to a finding of bad faith is some attribution of knowledge by a registrant of a complainant’s trademark, whether actual or based upon a conclusion that a registrant should have known of the mark; *Liberty Natural Products Inc. v Solace Industries* CIIDRC 27084-CDRP (June 16, 2026)

<libertynaturals.ca>, at page 6. In *Shanghai HOTO Technology Co., Ltd v Lynn Shen* 26320-CDRP (Feb 17, 2026) <hototools.ca>, a case relied upon by the Complainant, the panel observed (at para 4.3.2):

“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”).”

57. The Complainant’s evidence is that the **Lynk&CO** Mark “enjoys significant goodwill worldwide” (Complaint, para 8) and that the Complainant has invested substantial resources in the promotion and protection of its intellectual property rights given the highly distinctive and invented nature of the LYNK&CO mark (para 9). In support, the Complainant refers to Annex 5, news or other articles (albeit from 2024-2026) concerning Lynk&Co demonstrating global outreach, and Annex 6, a single, undated page from its <lynkco.com> website. This Panel does not doubt that the Geely Group, the 2016 Geely-Volvo joint venture promoting Lynk&Co, and its Lynk&Co brand are well known, at least in China. The Complaint (paras 2 to 4) states that the brand was launched in 2016, that over 1.5 million vehicles bearing the LYNK&CO brand have been sold worldwide and that the brand is sold through over 700 showrooms. The press release of January 3, 2025 in Annex 5 reports 285,441 units sold in 2024 alone and more than 1.33 million users to that date, and the Annex 5 articles record that the brand’s first model was launched in 2017. It may reasonably be inferred from this evidence that the brand was well established in its home market of China well before November 2023. However, given that the Domain Name was registered in November 2023, undated evidence and evidence from 2024-2026 does not make it clear that the **Lynk&CO** Mark was well-known in Canada at the time of registration. This may be contrasted with the clear evidence from which prior knowledge of a mark could be reasonably inferred in *Shanghai HOTO Technology Co.* 26320-CDRP (Feb 17, 2026), at page 5.
58. The Complainant argues it is implausible that the Registrant independently adopted the Domain Name without targeting the Complainant (para 43) and that it is not credible that the Registrant selected the Domain Name without knowledge of the Complainant and its trademark rights (Complaint, para 47). The Complainant’s post-registration evidence misses the point insofar as knowledge of the **Lynk&CO** Mark is concerned.

59. Whether the Registrant is a "Montreal Chinese", the Registrant graduated with a bachelor's degree in computer science from Qingdao University, Shandong Province, China, and maintains deep personal, academic, and professional ties to the region (Exhibit H, page 70). The Registrant's evidence emphasizes their connection to China – for instance, Response, Exhibit C shows the Registrant's Chinese and English language marketing and advertising materials associated with the website <montrealchinese.com>. This is significant in assessing the probability that the Registrant selected the Domain Name with knowledge of the **Lynk&CO** Mark.
60. In their Response the Registrant categorically rejects the Complainant's allegations of bad faith and states (at page 19) that the claim is entirely speculative and lacks a factual basis. The Registrant explains (Response, page 18) that the Domain Name <lynkco.ca>, is composed of common linguistic roots (e.g., "link" + "co") that are ubiquitous in commercial, trade, and digital connectivity contexts. They say further that the domain name is a "descriptive or common term domain name". The Registrant's explanation is disingenuous at best. It is also at odds with the Registrant's other explanations: that the Domain Name was selected specifically as the web platform for the Registrant's international student custodianship services (Response, page 7), and that it was acquired as part of "long-term commercial asset development, including potential applications in international trade, logistics, and B2B platform initiatives" (Response, page 18).
61. The Registrant implausibly asserts (Response, page 7) that:
- "LYNK / LINK": Represents "connection, bridge, or link" (a phonetic and semantic equivalent symbolizing the bridging role between international students, non-resident parents, educational institutions, and Canadian local services). "LYNK" serves as a powerful phonetic and semantic representation of "connection, bridge, or link."
62. The Registrant does not provide evidence that its international student custodianship business operated at any time before the registration of the Domain Name. Indeed, on their documentary evidence:
- marketing through <montrealchinese.com> does not begin until December 2024 (see Commercial Advertising and Marketing Records, Response, Exhibit C), and consists of forum postings giving the Registrant's own contact details, on a website with which the Registrant is evidently associated, as the Complainant observed in its submission on costs;
 - the earliest invoice for Guardian Service was dated December 1, 2024;
 - the earliest Custodianship Declarations in evidence are dated April 2025 (Response, Exhibit A); and
 - the only Statement of Business or Professional Activities (CRA form T2125) in evidence is for the 2025 taxation year and was printed on July 28, 2026, after service of the Complaint (Response, Exhibit B);
63. Perhaps more to the point, even after registration, the inactive, "under development" website at <lynkco.ca> hardly appears as part of a "long-term commercial asset development, including potential

applications in international trade, logistics, and B2B platform initiatives”. Further, there is certainly no credible evidence supporting the purported rationale for the selection of the Domain Name.

64. Overall, the Domain Name has no apparent value to the Registrant’s stated business except through its correspondence to a mark well known to the Registrant’s Chinese target market, and no credible alternative explanation for its selection has been offered. It is not necessary to find that the Registrant intended to compete with the Complainant’s automotive business. It suffices that the Registrant selected the Domain Name because of its correspondence to the **Lynk&CO** Mark, in order to take advantage of the recognition which that Mark enjoys among the Registrant’s intended audience. That is targeting of the Complainant’s Mark, and it constitutes bad faith registration within paragraph 3.5, the enumerated circumstances of which are expressly stated to be “in particular but without limitation”.

Overview of “Bad Faith Registration”

65. This Panel finds that the Registrant registered the Domain Name in bad faith as described in paragraph 3.5; the Complainant has satisfied paragraph 4.1(b) of CDRP.

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

66. To succeed in this proceeding, paragraph 4.1(c) of the CDRP requires the Complainant to provide “some evidence” that the Registrant has no legitimate interest in the Domain Name as described in paragraph 3.4 of the Policy. CDRP paragraph 3.4 sets out a non-exhaustive list of six “legitimate interests”; see *Equifax Inc. and Equifax Canada Co. v Antonia Ojo/0902066 BC Ltd.* 16881-CDRP (April 25, 2022), at para 48. The Complainant says that the Registrant does not meet any of the enumerated circumstances set out in paragraph 3.4 of the Policy to establish a legitimate interest in the Domain Name.

Addressing Examples of “Legitimate Interest” under Paragraph 3.4

67. Paragraph 3.4(a) requires good faith use of a mark by a registrant with rights in the mark. On the evidence, the Registrant had no rights to the Complainant’s Mark so this provision is inapplicable.
68. Paragraph 3.4(b) requires registration in good faith in association with any wares, services, or business and a clearly descriptive domain name. However, the evidence makes it clear that the Domain Name is not clearly descriptive of any wares, services, or business so as to fall within this provision.
69. Paragraph 3.4(c) also requires good faith registration of a domain name. However, it is clear that the Domain Name is not the generic name for any wares, services, or business. It specifically targets, in the context of their target market, the **Lynk&CO** Mark and such targeting supports a finding of bad faith registration.
70. With respect to paragraph 3.4(d), there is no evidence that the Registrant was using the Domain Name in good faith for a legitimate *non-commercial* activity.

71. With respect to paragraph 3.4(e), the Registrant is identified as “**Qiang Zhang**”. Clearly, the Domain Name does not comprise the name of the Registrant, nor a name, surname or other reference by which the Registrant is commonly identified. Therefore, the provisions of paragraph 3.4(e) do not apply.
72. Last, the Domain Name is not the geographical name of a location of any non-commercial activity or place of business. And, the Domain Name is not the geographical name of the location of the Registrant’s non-commercial activities or place of business. Therefore, the provisions of paragraph 3.4(f) do not apply.
73. The Panel must also consider, under the closing words of paragraph 4.1, whether the Registrant has proved, on a balance of probabilities, that it has a legitimate interest in the Domain Name.
74. In considering whether the Registrant has a “legitimate interest”, this Panel accepts that the Complainant has not licensed, authorized, or otherwise permitted the Registrant to use the **Lynk&CO** Mark or any confusingly similar variant. The Registrant’s bad faith registration including the absence of evidence of use prior to 2024 and implausibility of their explanation for the Domain Name selection negate any argument that the Registrant has a legitimate interest in the Domain Name.

Overview on “Legitimate Interest”

75. This Panel finds that the Complainant has provided “some evidence” that the Registrant has no legitimate interest in the Domain Name, and that the Registrant has not proved, on a balance of probabilities, that it has a legitimate interest in the Domain Name. Accordingly, the Complainant has satisfied paragraph 4.1(c) of the Policy.

COSTS

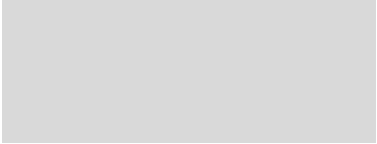
76. Paragraph 4.6 of the CDRP permits an award of costs only where a registrant is successful. As the Registrant has not prevailed, this Panel dismisses the Registrant’s claim for costs.

DECISION and ORDER

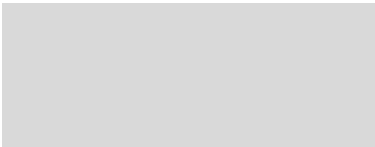
77. For the above reasons, in accordance with Paragraph 4 of the CDRP, Paragraph 12 of the Resolution Rules, the Panel orders that registration of the Domain Name, <**lynkco.ca**> be transferred to the Complainant.

Made as of this 20th day of September, 2026

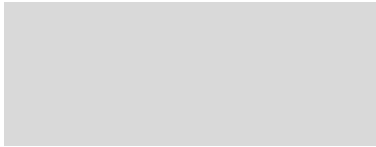
SIGNATURE OF PANEL



Thomas Manson, K.C. (Chair)



Leslie E. Maerov, FCI Arb., Q. Arb.



Zak Muscovitch

