ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
MELEX Technologies Inc d/b/a SIMPLE PEPTIDE v. Name Redacted
Case No. D2026-4202

1. The Parties

Complainant is MELEX Technologies Inc. d/b/a SIMPLE PEPTIDE, United States of America ("United States"), represented by Pierson Ferdinand LLP, United States.

Respondent is Name Redacted, represented by John Berryhill, Ph.d., Esq., United States.

2. The Domain Name and Registrar

The disputed domain name <simplepeptides.com> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 18, 2026. On September 18, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 22, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Handle - simplepeptidescom-reg Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to Complainant on September 22, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on October 1, 2026.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the "Policy" or "UDRP"), the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules").

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified Respondent of the Complaint, and the proceedings commenced on October 5, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 29, 2026. The Response was filed with the Center on October 29, 2026.

The Center appointed Georges Nahitchevansky as the sole panelist in this matter on November 3, 2026. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

Complainant, MELEX Technologies Inc., operates a peptide research and supply company in Florida, United States. Complainant uses the name and mark SIMPLE PEPTIDE for its products and services and owns United States trademark registrations for that mark. These include a word mark registration for SIMPLE PEPTIDE (Registration No. 8,040,483) that was filed on April 9, 2025, and issued to registration on November 25, 2025, and a logo registration for SIMPLE PEPTIDE (Registration No. 8,311,330) that was filed on October 17, 2025, and issued to registration on June 23, 2026. Complainant also owns the domain name <simplepeptide.com>, which was registered on December 19, 2023, and uses such for a website concerning Complainant and its products and to sell Complainant's products.

Respondent is, a medical practitioner, whose company provides personalized health-restoration programs. Respondent registered the disputed domain name on August 11, 2023. Respondent does not appear to have made active use of the disputed domain name, and while there may have been some usage with a web page at some point there is evidence the disputed domain name did resolve at one point to a GoDaddy parked page that included links related to “Simple Peptides”. Currently, the disputed domain name resolves to a GoDaddy parked page with no links.

5. Parties’ Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Complainant asserts that it was incorporated in 2019 and that it has “acquired significant common law rights in the SIMPLE PEPTIDE mark through continuous and extensive use in commerce since July 18, 2019”. Complainant also asserts that it has rights in the SIMPLE PEPTIDE mark by virtue of its United States trademark registrations for the mark. Lastly, Complainant claims that it is an industry leader and that the public associates the SIMPLE PEPTIDE mark with Complainant on account of the enormous sales made through Complainant's website at “www.simplepeptide.com” since as early as March 1, 2024.

Complainant maintains that the disputed domain name is virtually identical to Complainant's SIMPLE PEPTIDE mark as it differs only by the addition of the letter “s” at the end of the word “peptide”.

Complainant contends that Respondent does not have rights or legitimate interests in the disputed domain name as Respondent (i) is not commonly known by the disputed domain name, (ii) has no trademark rights in SIMPLE PEPTIDES, (iii) has no authorization from Complainant to use the SIMPLE PEPTIDE mark and (iv) has not made a bona fide offering of goods or services or a non-commercial or fair use of the disputed domain name. In that regard, Complainant claims that Respondent used the disputed domain name to sell goods purporting to be the Complainant's products and that after Respondent's website was taken down the disputed domain name was used with a parked page displaying pay-per-click advertising links.

Lastly, Complainant argues that Respondent has registered and used the disputed domain name in bad faith. Complainant maintains that because the disputed domain name is merely a pluralization of the SIMPLE PEPTIDE mark, Respondent likely had actual knowledge of Complainant's mark and specifically targeted Complainant when it registered the disputed domain name. Complainant further argues that Respondent acted in bad faith by using a privacy service to register the disputed domain name and has engaged in

typosquatting by registering a plural version of the SIMPLE PEPTIDE mark. Finally, Complainant asserts that Respondent has used the disputed domain name in bad faith by intermittently using such for "a website offering counterfeit versions of Complainant's products", or deactivating the disputed domain name, and has done so to trade on the goodwill associated with Complainant's SIMPLE PEPTIDE mark.

B. Respondent

Respondent rejects Complainant's contentions.

Respondent maintains that "simple peptides" is a "common descriptive phrase" and that Respondent registered the disputed domain name along with several other domain names based on related phrases in August 2023. Respondent further maintains that it registered the disputed domain name in August 2023 prior to Complainant acquiring any rights in the SIMPLE PEPTIDE mark. Respondent notes that Complainant's United States trademark registrations to the SIMPLE PEPTIDE mark claim a first use date of March 1, 2024. Respondent also notes that while Complainant maintains it used the SIMPLE PEPTIDE mark since its formation in July 2019, Complainant provided no evidence of such use at any time prior to March 2024 when Complainant's website at <simplepeptide.com> went live. In support of that contention, Respondent argues that the relevant evidence confirms that Complainant made no use of SIMPLE PEPTIDE prior to March 1, 2024. In all, Respondent maintains that it registered the disputed domain name before Complainant adopted and started using the disputed domain name.

Respondent concedes that Complainant has registrations for SIMPLE PEPTIDE that satisfy the standing requirement of the first element.

Respondent contends that it has legitimate rights and interests in the disputed domain name as Respondent registered the disputed domain name before Complainant developed any rights in SIMPLE PEPTIDE and did so as part of a cluster of domain names Respondent registered that included the word "peptide". Respondent also contends that "simple peptides" is a descriptive phrase used in relevant scientific literature.

Respondent asserts that there is no credible evidence that Respondent registered and used the disputed domain name in bad faith as the disputed domain name was registered before Complainant acquired rights in the SIMPLE PEPTIDE mark. Respondent also asserts that certain contentions by Complainant are knowingly false, such as claiming to have sent multiple cease and desist demands. Respondent also claims that Complainant has failed to disclose certain facts, such as an alleged purchase attempt by a domain name broker likely engaged by Complainant.

Lastly, Respondent asks that the Panel to redact Respondent's personal name given the potential of reputational harm to Respondent from Complainant's false contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, to succeed Complainant must satisfy the Panel that:

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

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

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

A. Identical or Confusingly Similar

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between

the Complainant's trademark and the disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The disputed domain name incorporates the SIMPLE PEPTIDE mark in its entirety, with the addition of the letter 's'. The Panel finds that the mark remains recognizable within the disputed domain name and that the disputed domain name is confusingly similar to the mark. WIPO Overview 3.1, section 1.8.

Furthermore, the Respondent concedes for purposes of the first element that Complainant has satisfied the standing requirement through its trademark registrations for SIMPLE PEPTIDE.

As such, the Panel finds for the Complainant on the first element.

B. Rights or Legitimate Interests

In view of the Panel's findings under the third element below, the Panel need not decide whether the Respondent has rights or legitimate interests in the disputed domain name.

C. Registered and Used in Bad Faith

The Panel notes that, for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith. Complainant must establish the conjunctive requirement of both bad faith registration and use. Here, and as explained further below, the Panel concludes that Complainant has not established bad faith registration of the disputed domain name.

Up front, it must be noted that Complainant's trademark registrations for its SIMPLE PEPTIDE mark were filed in 2025 and did not issue to registration until November 2025 and June 2026. In addition, both registrations claim first use dates of March 1, 2024. Thus, on its face Complainant's rights in SIMPLE PEPTIDE through its registrations all post-date Respondent's registration of the disputed domain name in August 2023.

To overcome the apparent lack of rights in SIMPLE PEPTIDE at the time disputed domain name was registered, Complainant claims "significant common law trademarks rights" in its SIMPLE PEPTIDE mark through "continuous and extensive use" of the mark since July 18, 2019, the date of Complainant's incorporation in Florida.

Notably missing in Complainant's submissions, however, is any evidence showing this claimed "continuous and extensive use" of the SIMPLE PEPTIDE mark at any time prior to the registration of the disputed domain name by Respondent.

To be sure, unsupported and conclusory allegations of common law rights are entitled to no weight, as the proof of such rights requires the submission of sufficient documentary evidentiary. WIPO Overview 3.1, sections 1.3.

The failure of Complainant to provide any evidence supporting its claimed common law rights going back to July 2019 is telling and suggests, as Respondent argues, that Complainant has simply tried to shore up its claimed rights by making a claim of use since 2019 in order to claim bad faith registration by Respondent. Indeed, Complainant itself implicitly recognizes this evidentiary lacune by asserting it has "continuous use of the mark in connection with peptides, supplements, nutraceuticals, and wellness products since as early as March 1. 2024" and providing only examples of use from 2026. If Complainant had proof that it had been using the SIMPLE PEPTIDE mark since July 2019, as it now claims, such evidence should have been produced.

Moreover, there are a number of claims made by Complainant that have no support whatsoever in the record before the Panel. For example, Complainant claims that there were "repeated takedown requests" and "cease-and-desist communications" regarding Respondent's website at the disputed domain name. However, Complainant did not produce a single example of these communications and provided no dates concerning any of these claimed takedown requests or cease and desist communications. Complainant also claims that Respondent was selling counterfeit goods and/or engaged in phishing through the website at the disputed domain name. But again, no evidence was produced to substantiate or suggest that these contentions have any basis. In all, to the Panel Complainant's assertions appear to be like the proverbial plate of spaghetti thrown at the wall hoping that something sticks.

But beyond the significant evidentiary gaps in Complainant's contentions, another issue that is raised by Respondent is the fact that the phrase "simple peptides" has a descriptive, common word meaning in at least the scientific community. Complainant simply claims without any evidence that consumers associate the phrase with Complainant. While Complainant might today enjoy rights in SIMPLE PEPTIDE in connection with its products and services, such rights do not retroactively or magically go back in time to when Respondent registered the disputed domain name in August 2023. Certainly, Complainant failed to prove that "simple peptides" was anything more than a common descriptive phrase in August 2023 when Respondent registered the disputed domain name.

In all, the Panel finds that Respondent did not register the disputed domain name in bad faith targeting the Complainant or its trademark rights because the Complainant had no trademark rights at the time that the Respondent registered the disputed domain name. WIPO Overview 3.1, section 3.8.1.

The Panel finds the third element of the Policy has not been established.

D. Reverse Domain Name Hijacking

Although Respondent has not expressly requested a finding that the Complainant has engaged in Reverse Domain Name Hijacking ("RDNH"), Respondent has argued that the Complaint was brought in bad faith by Complainant. The Panel thus construes Respondent's submission as requesting a finding of RDNH.

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. WIPO Overview 3.1, section 4.16.

Here, Complainant was well aware that Respondent registered the disputed domain name in August 2023. However, while Complainant made claims of strong rights in SIMPLE PEPTIDE going back to July 2019, as well as contentions that consumers associate SIMPLE PEPTIDE with Complainant, Complainant did not produce any evidence supporting the existence of any rights or reputation in SIMPLE PEPTIDE going back to July 2019 or at any time prior to the registration of the disputed domain name in August 2023. Moreover, Complainant made a number of statements, as already noted, that simply had no evidentiary support.

Given the fact that Complainant glossed over its claimed prior rights in SIMPLE PEPTIDE with unsubstantiated and conclusory allegations makes it more likely than not that Complainant was, or should have been aware, that it did not have sufficient rights in SIMPLE PEPTIDE to succeed in a UDRP proceeding, but was hoping that the Panel would somehow find otherwise. Simply put, the facts in this proceeding demonstrate that Complainant clearly ought to have known it could not succeed under any fair interpretation of the facts reasonably available prior to the filing of the complaint and that basing its complaint on the barest of allegations without any supporting evidence – such as claiming bad faith registration of the disputed domain name by Respondent with no proof of Complainant's rights in the SIMPLE PEPTIDE mark prior to August 2023 (and only showing use of SIMPLE PEPTIDE by Complainant after March 2024) – was doomed to fail (WIPO Overview 3.1, section 4.16).

Accordingly, the Panel finds that the Complaint has been brought in bad faith and constitutes an attempt at Reverse Domain Name Hijacking.

E. Respondent's Request for Redaction

Respondent requests that Respondent's personal name be redacted as the Complainant's contentions against Respondent have been abusive and are “likely to do substantial harm to the Respondent's reputation – earned over a lifetime of legitimate hard work and effort.“

Under Paragraph 10(a) of the Rules, a Panel has broad discretion to conduct the administrative proceeding in such manner as it considers appropriate provided it remains consistent with the Policy and Rules. Section 4(j) of the Policy provides that a Panelist can choose to redact portions of a decision only in exceptional cases. Thus, the question is whether this case is exceptional warranting a redaction of Respondent's personal name.

Here, the Panel has found that Complainant has engaged in RDNH and has noted that Complainant made allegations of counterfeiting and illicit phishing against Respondent without providing any evidence supporting those contentions or suggesting that this might possibly be the case. Such unproven allegations could be harmful to the individual Respondent's reputation given that there is no evidence of bad faith registration of the disputed domain name. As such, the Panel believes that redaction of the Respondent's personal name should be granted.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Georges Nahitchevansky/
Georges Nahitchevansky
Sole Panelist
Date: November 17, 2026