

ADMINISTRATIVE PANEL DECISION

G4S Limited v. Serkouh Abderrahmane, Devarch Digital
Case No. D2024-5171

1. The Parties

Complainant is G4S Limited, United Kingdom, represented by SafeNames Ltd., United Kingdom.

Respondent is Serkouh Abderrahmane, Devarch Digital, Morocco.

2. The Domain Name and Registrar

The disputed domain name <g4-services.com> (the “Domain Name”) is registered with Hostinger Operations, UAB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 16, 2024. On December 17, 2024, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On December 18, 2024, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Domain Admin, Privacy Protect, LLC (PrivacyProtect.org)) and contact information in the Complaint. The Center sent an email to Complainant on December 18, 2024, 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 December 19, 2024

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 December 20, 2024. In accordance with the Rules, paragraph 5, the due date for Response was January 22, 2025. Respondent sent email communications to the Center on December 20, and 25, 2024.

The Center appointed Robert A. Badgley as the sole panelist in this matter on January 27, 2025. 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

According to the Complaint:

“The Complainant is a London-based global security company which provides security and facility services in around 90 countries across the world. Initially founded in 1901, the Complainant has been operating under its current name, G4S (or Group 4 Securicor) since 2004, when Group 4 Falck and Securicor merged. In 2021, the Complainant was acquired by Allied Universal, and presently has a network of more than 800,000 employees globally, with more than 120,000 employees across Africa. [...] The Complainant is no longer publicly traded and now operates under the name G4S Limited.” [...]

“The Complainant offers a diverse range of services, broadly divided into the categories of ‘Security Solutions’, ‘Cash Solutions’, ‘Consulting Services’, ‘Care and Justice Services’ and the ‘G4S Academy’. [...] The Complainant also provides tailored country-specific services across different industry sectors. These include, for example, 6 courier-related services, as well as offerings for the sectors of retail and financial institutions. Specifically, in Morocco, the Complainant specialises in logistics, electronic and physical security, event management and security training, as well as logistics.”

Complainant has owned the domain name <g4s.com> since 1999, and uses that domain name to host a commercial website promoting and offering its services. The site contains pages in multiple languages and tailored to specific countries, such as some French language pages featuring Complainant’s services in Morocco.

Complainant asserts:

“The Complainant has accrued substantial international presence. The Complainant’s companies, subsidiaries, and associated offices operate worldwide, including, for example, one of its subsidiaries in Morocco, such as G4S Integrated Services Morocco SA. [...] The Complainant has multiple offices across Morocco, with their headquarters in Casablanca. [...] The Complainant traces its operations in Morocco back to 1995 and currently has over 12,000 employees. A major breakthrough in the Moroccan market occurred in 2013 when G4S was awarded a multi-million-dollar contract to provide security services at the Tangier Port. [...] On a third-party website, the Complainant has been listed as the top security services company in Morocco.”

Annexed to the Complaint are media articles recognizing Complainant’s G4S security services in Morocco.

Complainant holds various registrations of the trademark G4S, including: United States Patent and Trademark Office Reg. No. 3,378,800, registered on February 5, 2008 in connection with, among other things, “computer hardware and software for security systems” and “security services for the protection of persons and goods”; International Reg. No. 885912, registered on October 11, 2005; and European Union Reg. No. 015263064, registered on September 20, 2016.

Complainant maintains a social media presence. For example, Complainant’s Facebook page has more than 475,000 followers, and its LinkedIn page has more than 1,000,000 followers.

Several prior UDRP panels have recognize that Complainant’s G4S mark is “well-known”. See, e.g., *G4S Limited v. Anthony Anderson*, WIPO Case No. [D2024-3154](#).

The Domain Name was registered on September 25, 2024. The Domain Name resolves to a website in both French and English which promotes and offers Respondent's personal security services. Respondent's site displays a logo which differs from Complainant's logo, but the color scheme throughout the site (red, black, and white) resembles the color scheme at Complainant's website. According to Complainant, Respondent's site offers security and related services in direct competition with Complainant.

There is a registered company under the name 'G4 Services' in Morocco, with the address matching Respondent's website. It appears that this company has been in existence for two years.

Complainant asserts that Respondent's use of the Domain Name and the corresponding website which offers security services in Morocco may lead to consumer confusion. According to Complainant: "An example of confusion between the Complainant and the Respondent's services is a 'yellow pages' entry in Telecontact.ma, which mistakenly lists 'Group 4 Securicor (G4S Maroc)' at the address of the Respondent."

On November 12, 2024, Complainant's counsel sent Respondent a cease-and-desist letter. According to Complainant, Respondent did not reply.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name.

B. Respondent

Respondent did not formally reply to Complainant's contentions.

On December 20, 2024, Respondent sent the following three emails to the Center:

"Thanks for your email, I understand the issue a little bit. How can I help you?"

"I don't fully understand the issue, as the domain was available at the time of registration. However, if you are particularly interested in acquiring this domain, I am open to discussing a potential sale."

"Thank you for your feedback, sir. If finding a solution together is an option, could you please share the contact details of the person from G4S I can speak to regarding this matter? I would like to explore ways to reach a mutual agreement."

On December 25, 2024, Respondent sent the following email to the Center and Complainant's counsel:

"I've observed your active interest in the domain g4-services.com and noted that legal actions are underway to reclaim it. I fully understand the significance of this domain for your organization. Considering the time and resources such processes typically require, I'd like to propose a more efficient alternative. By offering the domain at a symbolic price, we can avoid unnecessary complications and delays, saving valuable time for both parties. This approach not only simplifies matters but also ensures a smooth and mutually satisfactory resolution. Please let me know your thoughts on this proposal. I am confident we can reach an agreement quickly and move forward without further challenges. Thank you for your attention, and I look forward to hearing from you."

6. Discussion and Findings

Paragraph 4(a) of the Policy lists the three elements which Complainant must satisfy with respect to the Domain Name:

- (i) the 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 Domain Name; and
- (iii) the Domain Name has been 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 Complainant's trademark and the Domain Name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7

The Panel concludes that Complainant has rights in the trademark G4S through registration and use demonstrated in the record. The Panel also concludes that the Domain Name is confusingly similar to that mark. The Domain Name contains G4 and, after a hyphen, adds the word "services", which word of course begins with the final letter in Complainant's mark. The Panel concludes that the mark is recognizable within the Domain Name.

Complainant has established Policy paragraph 4(a)(i).

B. Rights or Legitimate Interests

Pursuant to paragraph 4(c) of the Policy, Respondent may establish its rights or legitimate interests in the Domain Name, among other circumstances, by showing any of the following elements:

- (i) before any notice to you [Respondent] 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; or
- (ii) you [Respondent] (as an individual, business, or other organization) have been commonly known by the Domain Name, even if you have acquired no trademark or service mark rights; or
- (iii) you [Respondent] are making a legitimate noncommercial or fair use of the Domain Name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

Although the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the difficult task of "proving a negative", requiring information often primarily within the knowledge or control of the respondent. Thus, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on the complainant). If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Here, in the Panel's view, Complainant has made out a prima facie case that Respondent lacks rights or legitimate interests vis-à-vis the Domain Name. From the undisputed record, Complainant's G4S mark has been extensively used for years, including in Respondent's country, Morocco, to identify and distinguish Complainant's security services, and the G4S mark has come to enjoy a fair measure of renown in the security services sector. The fact that Respondent offers services in competition with Complainant's services supports a finding that Respondent has targeted Complainant's mark and has sought to enhance its

own business by creating a false impression among consumers that Respondent's website is somehow associated with Complainant.

The Panel notes that Respondent registered a company name, apparently within the past two years, for G4 Services. Complainant argues that the registration of a company name entails no examination process, in contrast to a trademark registration process in many jurisdictions. As such, Complainant argues, Respondent's mere registration of a company name that corresponds to a domain name Respondent registered does not confer upon Respondent a legitimate interest in the Domain Name. See *Chicago Mercantile Exchange Inc., CME Group Inc. v. Globex Biz Solutions*, WIPO Case No. [D2015-0671](#) ("If the mere registration of a company name (as opposed to an examined trade mark) was sufficient in itself to show rights or legitimate interests it would be possible for a professional cybersquatter to defeat any UDRP case merely by obtaining an unexamined company name registration upon the commencement of a claim against it"). In the Panel's view, this company name registration by Respondent, taken in the context of this record, is insufficient on its own to bestow on Respondent a legitimate interest in the Domain Name.

As noted above, Respondent has not come forward in this proceeding – or in response to Complainant's pre-Complaint cease-and-desist letter – to rebut any of Complainant's allegations or articulate and prove any bona fide basis for registering the Domain Name (other than the fact that it was available at the time).

Complainant has established Policy paragraph 4(a)(ii).

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy provides that the following circumstances, "in particular but without limitation", are evidence of the registration and use of the Domain Name in "bad faith":

- (i) circumstances indicating that Respondent has registered or has acquired the Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Domain Name registration to Complainant who is the owner of the trademark or service mark or to a competitor of that Complainant, for valuable consideration in excess of its documented out of pocket costs directly related to the Domain Name; or
- (ii) that 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 Respondent has engaged in a pattern of such conduct; or
- (iii) that Respondent has registered the Domain Name primarily for the purpose of disrupting the business of a competitor; or
- (iv) that by using the Domain Name, Respondent has intentionally attempted to attract, for commercial gain, Internet users to Respondent's website or other online location, by creating a likelihood of confusion with Complainant's mark as to the source, sponsorship, affiliation, or endorsement of Respondent's website or location or of a product or service on Respondent's website or location.

The Panel concludes, on this undisputed record and on a balance of probabilities, that Respondent more likely than not registered and used the Domain Name in bad faith under the Policy. The Panel incorporates its discussion above in the "Rights or Legitimate Interests" section.

On this record, given the renown Complainant's G4S mark have attained and the fact that Respondent is offering services in direct competition with Complainant's services, the Panel notes that Respondent must have had Complainant's G4S mark in mind when registering the Domain Name. The Panel also finds that Respondent's commercial website offering services in competition with Complainant's services supports a finding of bad faith registration and use of the Domain Name within the meaning of the above-quoted Policy paragraphs 4(b)(iii) and 4(b)(iv).

Complainant has established Policy paragraph 4(a)(iii).

7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the Domain Name <g4-services.com> be transferred to Complainant.

/Robert A. Badgley/

Robert A. Badgley

Sole Panelist

Date: February 4, 2025