

ARBITRATION AND MEDIATION CENTER

ADMINISTRATIVE PANEL DECISION

Synopsys, Inc. v. Sanskruti Parthe Case No. D2025-2974

1. The Parties

The Complainant is Synopsys, Inc., United States of America ("United States"), represented by Hogan Lovells (Paris) LLP, France.

The Respondent is Sanskruti Parthe, Afghanistan.

2. The Domain Name and Registrar

The disputed domain name <synopsysinc.com> is registered with Squarespace Domains LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 25, 2025. On July 25, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 25, 2025, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 28, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on August 1, 2025.

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 the Respondent of the Complaint, and the proceedings commenced on August 5, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 25, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 26, 2025.

The Center appointed Manoel J. Pereira dos Santos as the sole panelist in this matter on August 29, 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

The Complainant is a United States, publicly traded corporation engaged in electronic design automation which was founded in 1986. The Complainant is a worldwide leader in providing solutions for designing and verifying advanced silicon chips, and for designing processes and models to manufacture those chips.

The Complainant owns several trademark registrations for SYNOPSYS in a variety of jurisdictions, including for example: United States Trademark Registration No. 1601521 (service mark), registered June 12, 1990; United States Trademark Registration No. 1618482, registered October 23, 1990; Australian Trademark Registration No. 607361, registered July 22, 1993; Canadian Trademark Registration No. TMA458822, registered June 7, 1996; and European Union Trade Mark No. 000181172, registered on February 1, 1999.

The Complainant also owns and operates a number of domain names consisting of or including the SYNOPSYS trademark, including <synopsys.com> which was registered in 1989. The Complainant has also developed a strong online presence by being active on various social-media platforms.

The disputed domain name was registered on May 23, 2025 and, according to the evidence provided by the Complainant, has been used to create the email address "[...]@synopsysinc.com", which has been used to send emails impersonating the Complainant, promoting a so-called "Synopsys Inc Academy" and directing the recipient to visit the website to which the disputed domain name resolves, where a series of files are made available for download. Such evidence was presented in Annexes 10 and 11 of the Complaint.

The Respondent appears to be an individual located in Afghanistan. No other relevant information about the Respondent is available.

5. Parties' Contentions

A. Complainant

The Complainant asserts that the disputed domain name has been used by the Respondent in connection with an employment phishing scheme, by creating the email address "[...]@synopsysinc.com", which in turn has been used to send emails impersonating the Complainant, promoting a so-called "Synopsys Inc Academy" directing the recipient to visit the website to which the disputed domain name resolves (the Respondent's website) and to download files from that website.

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

First, the Complainant asserts that the disputed domain name is confusingly similar to its SYNOPSYS trademark because the addition of the term "inc" to the Complaint's SYNOPSYS trademark to form the disputed domain name does not prevent a finding of confusing similarity. The Complaint relies on prior UDRP decisions holding that similarly-composed domain names are confusingly similar to a complainant's trademark. See, e.g., *Synopsys, Inc. v. Office Rolls*, WIPO Case No. <u>D2022-2642</u> (<synopsys-inc.com>). The Complainant also argues that the applicable generic Top-Level Domain ("gTLD"), in this case ".com", may be disregarded for the purposes of assessment of the first element.

Second, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name because the Respondent is unable to invoke any of the circumstances set out in paragraph

4(c) of the Policy. The Complainant argues that prior UDRP panels have held that the use of a domain name for illegal activity (e.g., phishing, distributing malware, unauthorized account access/hacking, impersonation/passing off, or other types of fraud) can never confer rights or legitimate interests on a respondent. The Complainant also argues that prior UDRP panels have held that a term directly associated with the complainant's corporate name, such as a distinctive trademark followed by "inc", carries a risk of implied affiliation and it cannot constitute fair use as it effectively impersonates or suggests sponsorship or endorsement by the complainant. Therefore, the Complainant submits that the Respondent has not used the disputed domain name in connection with any genuine business offering, is not commonly known by the disputed domain name and is not making any legitimate noncommercial or fair use of the disputed domain name.

Third, the Complainant asserts that the disputed domain name was registered in bad faith because the Complainant's trademark is well known throughout the world as a result of its continued international use. See *Synopsys, Inc. v. Office Rolls*, supra; *Synopsys, Inc. v. Anton Kim*, WIPO Case No. D2025-0111. The Complainant also argues that the Respondent could not credibly sustain that it did not have prior knowledge of the Complainant's trademark at the time of registration of the disputed domain name. On the contrary, the Respondent had actual knowledge of the Complainant as the Respondent used the disputed domain name to impersonate the Complainant as part of a fraudulent employment phishing scheme. In addition, the Complainant infers that the Respondent's use of the disputed domain name is fraudulent in nature because the Respondent is using the disputed domain name to impersonate the Complainant in a fraudulent employment phishing scheme. The Complainant relies in prior UDRP decisions holding that using a domain name for per se illegitimate activity such as phishing is manifestly evidence of bad faith. See, e.g. *Synopsys, Inc. v. Name Redacted*, WIPO Case No. D2024-4832 (<synopsys.com>).

B. Respondent

The Respondent did not reply to the Complainant's contentions.

6. Discussion and Findings

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 Selected UDRP Questions, Third Edition, ("WIPO Overview 3.0"), section 1.7.

The Complainant has demonstrated it owns registered trademark rights in the well-known SYNOPSYS trademark in many jurisdictions, including the United States. The addition of the term "inc" does not prevent a finding of confusing similarity as the Complainant's SYNOPSYS is recognizable in the disputed domain name. See section 1.8 of the WIPO Overview 3.0 and Synopsys, Inc. v. Office Rolls, supra.

In addition, as stated in section 1.11 of the <u>WIPO Overview 3.0</u>, the applicable gTLD in a domain name (e.g., ".com", ".club", ".nyc") is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test.

Accordingly, the disputed domain name is confusingly similar to a mark in which the Complainant has rights, and the Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which the Respondent may demonstrate rights or legitimate interests in the disputed domain name.

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 that is often primarily within the knowledge or control of the respondent. As such, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production on this element 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.

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name. In fact, according to the unrebutted evidence (Annexes 10 and 11 of the Complaint), the disputed domain name has been used to create the email address "[...]@synopsysinc.com", which has been used to send emails impersonating the Complainant, and the disputed domain name resolves to a web page where a series of files are made available for download. As stated in section 2.13 of WIPO Overview 3.0, the use of a domain name for illegal activity (e.g., phishing, impersonation/passing off, or other types of fraud) can never confer rights or legitimate interests on a respondent. See also *Synopsys, Inc. v. Privacy Service Provided by Withheld for Privacy ehf / Paul Packer, Paulpacker ltd*, WIPO Case No. D2022-0154 (<symnopsys.com>); *Synopsys, Inc. v. Andrew Tuinstra*, WIPO Case No. D2024-0616 (<synopsysjobs.com>).

In addition, the disputed domain name reproduces the entirety of the Complainant's SYNOPSYS trademark followed by "inc", a composition that carries a risk of implied affiliation and cannot constitute fair use as it effectively impersonates or suggests sponsorship or endorsement by the Complainant. The Respondent has not rebutted the Complainant's prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

Therefore, the Panel finds the second element of the Policy has been established.

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.

In the present case, the Panel finds that the Respondent has registered and used the disputed domain name in bad faith. In fact, the Complainant's SYNOPSYS trademark has acquired considerable goodwill and renown throughout the world. See *Synopsys, Inc. v. Office Rolls*, supra; *Synopsys, Inc. v. Anton Kim*, supra. Therefore, the unrebutted evidence provided by the Complainant shows that the Respondent undoubtedly knew of the Complainant's SYNOPSYS trademark and added the term "inc" to suggest sponsorship or endorsement by the trademark owner. Accordingly, the only plausible basis for registering the disputed domain name has been bad faith.

Additionally, panels have held that the use of a domain name for illegal activity, as it was used to send fraudulent emails as part of a phishing employment scheme, constitutes bad faith. WIPO Overview 3.0, section 3.4. See *Synopsys, Inc. v. Name Redacted*, supra; *Synopsys, Inc. v. Lim Cheng, Lee Yew, Lee Yew, WIPO Case No. DCC2023-0017* (<onlinessynopsyssapps.cc> et al.). The unrebutted evidence provided by the Complainant (Annexes 10 and 11 of the Complaint) indicates that the disputed domain name has been used to impersonate the Complainant in a fraudulent employment phishing scheme. Accordingly, the use of the disputed domain name has been made in bad faith.

Therefore, the Panel finds the third element of the Policy has been established.

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 disputed domain name <synopsysinc.com> be transferred to the Complainant.

/Manoel J. Pereira dos Santos/
Manoel J. Pereira dos Santos
Sole Panelist

Date: September 11, 2025