

## **ADMINISTRATIVE PANEL DECISION**

MULTI MEDIA, LLC v. Laura Palmer

Case No. D2025-3234

### **1. The Parties**

The Complainant is MULTI MEDIA, LLC, United States of America, c/o Walters Law Group, United States of America.

The Respondent is Laura Palmer, Thailand.

### **2. The Domain Names and Registrar**

The disputed domain names <recurbate1.com>, <recurbate2.com>, <recurbate3.com>, <recurbate4.com>, <recurbate5.com> are registered with Porkbun LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 12, 2025. On August 13, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On August 13, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Whois Privacy, Private by Design, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 14, 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 15, 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 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 7, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 9, 2025.

The Center appointed Kaya Köklü as the sole panelist in this matter on September 15, 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 Californian limited liability company that provides online adult entertainment, mainly providing live webcam performances.

The Complainant is the owner the United States Trademark Registrations No. 4288943, registered on February 12, 2013, for CHATURBATE as a word mark, and No. 4988208, registered on June 28, 2016, for CHATRUBATE as a word and figurative trademark, providing protection for various digital services.

The Complainant operates its official website at <chaturbate.com>.

The Respondent is the registrant of all five disputed domain names and is reportedly located in Thailand.

The disputed domain names <recurbate1.com>, <recurbate2.com> and <recurbate3.com> were registered on August 15, 2023; the disputed domain names <recurbate4.com> and <recurbate5.com> were registered on August 13, 2024.

According to provided screenshots by the Complainant, the disputed domain names <recurbate1.com>, <recurbate2.com> and <recurbate3.com> were initially associated to websites with adult related content originating from the Complainant's website. At the time of the decision, these disputed domain names resolve to another website with same website layout and content as before, promoting the offered content as "The Ultimate Chaturbate Archive".

The disputed domain names <recurbate4.com> and <recurbate5.com> have apparently not been actively used so far and do resolve to general parking pages only.

#### **5. Parties' Contentions**

##### **A. Complainant**

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

##### **B. Respondent**

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

#### **6. Discussion and Findings**

According to paragraph 15(a) of the Rules, the Panel shall decide the Complaint in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

In accordance with paragraph 4(a) of the Policy, the Complainant must prove that each of the three following elements is satisfied:

- (i) the disputed domain names are identical or confusingly similar to a trademark in which the Complainant has rights;

- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain names; and
- (iii) the disputed domain names have been registered and are being used in bad faith.

Paragraph 4(a) of the Policy states that the Complainant bears the burden of proving that all these requirements are fulfilled, even if the Respondent has not replied to the Complainant's contentions. *Stanworth Development Limited v. E Net Marketing Ltd.*, WIPO Case No. [D2007-1228](#).

However, concerning the uncontested information provided by the Complainant, the Panel may, where relevant, accept the provided reasonable factual allegations in the Complaint as true. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 4.3.

For the evaluation of this case, the Panel has taken note of the [WIPO Overview 3.0](#), and, where appropriate, will decide consistently with the consensus views stated therein.

#### **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 3.0](#), section 1.7.

The Complainant has shown rights in respect of the CHATURBATE trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the CHATURBATE mark is recognizable within the disputed domain names, as they all comprise the significant second part of the mark, namely "urbate", which is not a word with a meaning. Even though the disputed domain names replace the first part "chat" by "rec" combined with a number from 1 to 5, the remaining similarities make the Complainant's CHATURBATE trademark in view of the Panel still recognizable within the disputed domain names.

This conclusion is further supported by the fact that the content of the website associated to some of the disputed domain names affirms confusing similarity since the Respondent explicitly refers to the Complainant, its CHATURBATE trademark and copied content from the Complainant's website. The Panel believes that the Respondent selected the disputed domain names primarily because of their confusing similarity with the Complainant and its CHATURBATE trademarks.

Accordingly, the disputed domain names are confusingly similar to the CHATURBATE mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7 and 1.15.

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 a 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 names. 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 names such as those enumerated in the Policy or otherwise.

Bearing also in mind that the website associated to the disputed domain names <recurbate1.com>, <recurbate2.com> and <recurbate3.com> prominently features the Complainant's CHATURBATE trademark and apparently allows unauthorized access to protected content by users of the Complainant's website at "www.chaturbate.com", the Panel has no doubt that the Respondent is trying to target the Complainant by creating confusion with the Complainant among Internet users. In view of the Panel, this results in an illegitimate use that can never confer rights or legitimate interests upon the Respondent.

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

In the present case, the Panel notes that the Respondent must have had the Complainant and the CHATURBATE mark in mind when registering the disputed domain names. The composition of the disputed domain names and the content of the website associated to the disputed domain names <recurbate1.com>, <recurbate2.com> and <recurbate3.com> clearly demonstrates that the Respondent was aware of the Complainant when registering the disputed domain names. It is even obvious to the Panel that the Respondent has deliberately chosen the disputed domain names to target the Complainant and its online services under the CHATURBATE trademark.

In the absence of a response, the Respondent particularly did not deny that the content on its website associated with the dispute domain names <recurbate1.com>, <recurbate2.com> and <recurbate3.com> is protected content which originates from the Complainant's website.

All in all, the Panel sees clear evidence of registration and use of the disputed domain names by the Respondent in bad faith within the meaning of the Policy.

The passive holding of the disputed domain names <recurbate4.com> and <recurbate5.com>, which differ from the other disputed domain names only in their numbering, does not change the Panel's finding on the Respondent's bad faith. [WIPO Overview 3.0](#), section 3.3.

Furthermore, the Panel notes that the Respondent was involved in previous UDRP decisions involving the same Complainant. See *Multi Media, LLC v. Laura Palmer and Hoang Anh*, WIPO Case No. [D2023-4983](#) and, *Multi Media, LLC v. Laura Palmer*, WIPO Case No. [D2023-3737](#).

The Panel finds that the Complainant has established the third element of the Policy.

## **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 names <recurbate1.com>, <recurbate2.com>, <recurbate3.com>, <recurbate4.com>, and <recurbate5.com> be transferred to the Complainant.

*/Kaya Köklü/*

**Kaya Köklü**

Sole Panelist

Date: September 29, 2025