

ADMINISTRATIVE PANEL DECISION

The Los Angeles Rams LLC v. Frank Mardian, MapleDots.ca
Case No. D2025-3761

1. The Parties

The Complainant is The Los Angeles Rams LLC, United States of America (United States), internally represented.

The Respondent is Frank Mardian, MapleDots.ca, Canada, represented by John Berryhill, Ph.d., Esq., United States.

2. The Domain Name and Registrar

The disputed domain name <rams.com> is registered with WHC Online Solutions Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 12, 2025. On September 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 18, 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 (Domain Admin) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 22, 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 September 18, 2025, and the amendment to the Complaint on September 22, 2025.

The Center verified that the Complaint together with the amended Complaint and amendment to the 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 September 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 20, 2025, and was granted the automatic four calendar day extension until October 24, 2025 per the Respondent’s request. The Response was filed with the Center on October 24, 2025. The Respondent sent email communications to the Center on October 9, 2025, and October 27, 2025.

On October 31, 2025, the Complainant submitted an unsolicited supplemental filing.

The Center appointed Warwick A. Rothnie, Clive N.A. Trotman, and Gerald M. Levine as panelists in this matter on November 20, 2025. The Panel finds that it was properly constituted. Each member of 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 one of the teams in the National Football League (NFL), the main professional football league in the United States. According to the Complaint, the Complainant and its predecessors have used RAMS and LOS ANGELES RAMS continuously in commerce for decades in connection with professional football, entertainment, and related merchandise.

The Complainant has a website at “www.therams.com”.

The Complaint includes evidence that the Complainant owns a number of registered trademarks in the United States for RAMS, LOS ANGELES RAMS or LA RAMS. These include:

- (1) United States Registered Trademark No 971,048, RAMS, which has been registered in the Principal Register since October 16, 1973 in respect of entertainment services, namely professional football exhibitions in International Class 41 and which claims first use in commerce in 1937;
- (2) There is a corresponding registration for LOS ANGELES RAMS registered on the same date for the same services, United States Registered Trademark No 971,047;
- (3) United States Registered Trademark No. 5,728,175, LOS ANGELES RAMS, which was registered in the Principal Register on April 16, 2019 in respect of a range of goods in International Classes 9, 14 and 28 including goods such as football helmets, downloadable software and electronic publications, jewelry, watches and toys and sporting goods and claiming first use in commerce in 1990;
- (4) United States Registered Trademark No 6,091,205, LA RAMS, which was registered in the Principal Register on June 30, 2020 in respect of education and entertainment services in International Classes 25, and 41, claiming a first use in commerce in 1946 and disclaiming exclusive rights over “LA”; and
- (5) United States Registered Trademark No 6,746,940, LA RAMS, which was registered in the Principal Register on May 31, 2022 in respect of a range of goods and services in International Classes 9, 16, 25 and 28 and claiming a first use in commerce in respect of those goods on March 31, 2020.

According to the Whois record, the disputed domain name was first registered on May 19, 1995.

Shortly before, and on the date the Complaint was filed, the disputed domain name resolved to a landing page featuring an image of two jumping rams above the word RAMS and “Domain For Sale”.

Evidence provided in the Response indicates that the Respondent obtained the disputed domain name from a third party in or about November 23, 2022 for payment of the sum of CAD 50,000.

It appears that the third party held the disputed domain name for a number of years during some of which the disputed domain name lay dormant and others of which it was offered for sale. It also appears that the third party made at least one unsuccessful attempt to “sell” the disputed domain name to the Complainant shortly after the Complainant won the Superbowl in February 2022.

The Respondent holds a portfolio of other domain names include a number of four letter domains and also some descriptive domains.

On January 25, 2025, the Respondent was approached by a Mr Recai Baltaci from Medyae Digital Agency with an offer on behalf of an undisclosed client to “buy” the disputed domain name for USD 2 million. Communications between the Respondent and Mr Baltaci continued somewhat desultorily until September 2025.

Following the approach from Mr Baltaci, the Respondent arranged for his broker to try to find a buyer willing to pay a higher price. On August 22, 2025, the broker (from Saw.com) approached the Complainant inquiring if it would be interested in securing the disputed domain name for USD 3.5 million.

5. Discussion and Findings

Paragraph 4(a) of the Policy provides that in order to divest the Respondent of a disputed domain name, the Complainant must demonstrate each of the following:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

Paragraph 15(a) of the Rules directs the Panel to decide the Complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.

A. Supplemental filing

Before addressing the substantive requirements under the Policy, the Panel deals with the Complainant's request to file a supplemental filing.

Apart from documents requested by the Panel pursuant to paragraph 12 of the Rules, neither the Policy nor the Rules expressly provide for supplemental filings. Their admissibility is therefore in the discretion of the Panel bearing in mind the requirements under paragraph 10 of the Rules to ensure that the proceeding is conducted with due expedition and both parties are treated equally, with each party being given a fair opportunity to present its case.

As long ago as 2000, in *Grove Broadcasting Co. Ltd v. Telesystems Communications Limited*, WIPO Case No. [D2000-0703](#), the panel pointed out:

“A Complainant should ‘get it right’ the first time and should have provided all the information necessary to prove its case from the material contained in the Complaint and its annexes alone. There is no right of reply under the Rules.”

Where unsolicited supplemental filings are admitted, therefore, it is usually because the material corrects some error or addresses something raised in a Response which could not reasonably have been anticipated or which was not otherwise appropriate to deal with until a respondent's position on a particular point was clear.

In the present case, the supplemental filing presents the Complainant's arguments arising from the disclosure in the Response of the circumstances in which the Respondent became the registrant and also those in which the Respondent's broker approached the Complainant with the offer of “sale”, matters which were not known to the Complainant when filing the Complaint, therefore, the Panel exercises its discretion to consider the Complainant's unsolicited supplemental filing.

On December 8, 2025, the Center received a request from the Respondent to be provided with an opportunity to submit a supplemental filing in response to the Complainant's unsolicited supplemental filing.

For the reasons set out below, that is unnecessary in this case.

B. Identical or Confusingly Similar

The first element that the Complainant must establish is that the disputed domain name is identical with, or confusingly similar to, the Complainant's trademark rights.

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 proven ownership of the registered trademarks identified in section 4 above including in particular RAMS.

In comparing the disputed domain name to the Complainant's trademark, it is permissible in the present circumstances to disregard the generic Top Level Domain (gTLD) component as a functional aspect of the domain name system. [WIPO Overview 3.0](#), section 1.11.

Disregarding the ".com" gTLD, the disputed domain name consists of the Complainant's registered trademark only. Accordingly, the Panel finds that the Complainant has established that the disputed domain name is identical with the Complainant's trademark and the requirement under the first limb of the Policy is satisfied.

C. Rights or Legitimate Interests

The second requirement the Complainant must prove is that the Respondent has no rights or legitimate interests in the disputed domain name.

Paragraph 4(c) of the Policy provides that the following circumstances can be situations in which the Respondent has rights or legitimate interests in a disputed domain name:

- (i) before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
- (ii) [the Respondent] (as an individual, business, or other organization) has been commonly known by the [disputed] domain name, even if [the Respondent] has acquired no trademark or service mark rights; or
- (iii) [the Respondent] is making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

These are illustrative only and are not an exhaustive listing of the situations in which a respondent can show rights or legitimate interests in a domain name.

While 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 often impossible 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. 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.

Although the Complaint and the supplemental filing question whether the Respondent did in fact obtain the disputed domain name from the previous registrant in the circumstances described in the Response, the

materials before the Panel do not permit it to dismiss the Respondent's claim. The Response does not include evidence from the Registrar confirming the date of transfer. Nor does it include evidence such as a receipt for the transfer of funds from the Respondent to the previous registrant. The Response does include, however, an email chain beginning in October 2022 in which the Respondent and the previous registrant negotiated over the price concluding with an email from the previous registrant on November 23, 2022 accepting the Respondent's counteroffer of a payment of CAD 50,000.

In his declaration, the Respondent admits to knowing the previous registrant and knowing of the previous registrant's activities as a "domainer". The fact of that knowledge, and that both the Respondent and the previous registrant are active in registering domain names for resale, is not a sufficient basis for the Panel to reject the evidence of the email exchange resulting in the agreement to transfer the disputed domain name to the Respondent for the sum of CAD 50,000 or to find that this is a case of cyberflight or that the Respondent and the previous registrant are in some way colluding to defeat the Complainant's rights.

Accordingly, the Panel proceeds on the basis that the Respondent became the registrant in or about November 23, 2022.

There is no dispute between the Parties that:

- (1) The Respondent registered the disputed domain name after the Complainant began using the trademark and also after the Complainant had registered its trademark;
- (2) The Respondent is not affiliated with the Complainant;
- (3) The Complainant has not otherwise authorised the Respondent to use the disputed domain name;
- (4) The disputed domain name is not derived from the Respondent's name. Nor is there any suggestion of some other name by which the Respondent is commonly known from which the disputed domain name could be derived; and
- (5) The Respondent has made no use of the disputed domain name other than to offer it for sale.

These factors are usually sufficient to establish a prima case that the Respondent does not have rights or legitimate interests in a disputed domain name.

The Respondent points out, and provides some evidence to support his claim, that he has "a small domain reselling business under the name 'Maple Dots'". He says he has developed an automated process for identifying and registering what he describes as "keyword domain names". This includes numerous four letter domains and also some descriptive terms such as (for example) <canary.ca>, <huge.ca>, <paws.ca>, and <ruby.ca>.

The Respondent says he secured the registration of the disputed domain name as part of that business. He points out it is a four letter domain and such domains have intrinsic value due to their shortness. Further, the word "rams" is the plural of the ordinary dictionary word for a male sheep. Further still, the website Acronym Finder lists some 29 entries for the acronym RAMS including terms such as "regional atmospheric modelling system" and "risk analysis management system". Yet still further, there are numerous businesses other than the Complainant which have registered trademarks in the United States or other parts of the world for "Rams" and even more businesses which are called "Rams" or have "Rams" in their name. The Response also includes 20 domain names for "rams" and either a country code TLD or another gTLD.

Notwithstanding these matters, the Complainant contends that merely holding a domain name for purposes of resale does not qualify as a right or legitimate interest under the Policy at least where the trademark that the domain name resembles is as famous as the Complainant contends its trademark to be. That is incorrect. It is now well-established under the Policy that domain name reselling itself can be legitimate activity under the Policy.

On the other hand, the Respondent's contention that the fact the disputed domain name is a four letter acronym and also an ordinary dictionary word used by many others is sufficient to qualify as rights or legitimate interests under the Policy is also overbroad. As section 2.10 of the [WIPO Overview 3.0](#)

summarises, whether the Respondent has rights or legitimate interests in such a case depends on the use made of the disputed domain name and, in particular, whether the use involves targeting the trademark owner or otherwise seeks to take advantage of the trademark owner's reputation in its trademark. That in turn involves an inquiry into the good faith of the Respondent's conduct.

In the circumstances of this case, that question is more appropriately dealt with under the third requirement of the Policy to which the Panel now turns.

D. Registered and Used in Bad Faith

Under the third requirement of the Policy, the Complainant must establish that the disputed domain name has been both registered and used in bad faith by the Respondent. These are conjunctive requirements; both must be satisfied for a successful complaint: see e.g., *Group One Holdings Pte Ltd v. Steven Hafto*, WIPO Case No. [D2017-0183](#).

Generally speaking, a finding that a domain name has been registered and is being used in bad faith requires an inference to be drawn that the respondent in question has registered and is using the disputed domain name to take advantage of its significance as a trademark owned by (usually) the complainant.

The Complainant puts its contention that the Respondent registered and is using the disputed domain name in bad faith in a number of ways. They may be fairly summarised by the submission in the supplemental filing:

"absent the use as a domain for the professional football team (Los Angeles Rams) there is not a material value for the domain, which is the reason it continues to remain unused and unsold. Respondent claims to have recently acquired the domain at a fairly significant price (\$50,000) and further claims to have received an offer from a mysterious foreign company, which of course did not result in any sale, but simultaneously with this mystery offer, just happened to again approach the Complainant again to see if we would purchase the domain at an exorbitant price without mentioning or referencing the other alleged offer of \$2,000,000."

The Panel is prepared to put to one side the absence of evidence in the Complaint, or the supplemental filing, demonstrating the fame of the Complainant's trademark. The Panel is prepared to accept that the name or trademark of one of the NFL franchises will be very well-known and recognisable amongst at least followers of American football. The word RAMS, however, is not like the word "ticketmaster" considered in *Ticketmaster Corporation vs. DiscoverNet, Inc.* WIPO Case No. [D2001-0252](#). "ticketmaster", while a combination of two ordinary English words, as a combined term has significance only as the Ticketmaster Corporation's trademark. RAMS, however, as set out in section 5C above, has both an ordinary dictionary meaning by itself and is used by many different businesses and even as an acronym for a number of different things or activities. Accordingly, what it signifies in any particular situation will depend very much on the context.

As the extract from the Complainant's supplemental filing quoted above indicates, the Complainant disputes that the Respondent ever received an offer to purchase the disputed domain name for USD 2 million.

The evidence before the Panel, however, consists of an exchange of emails between the Respondent and Mr Baltaci from Medyae Digital Agency in which an offer of USD 2 million is stated.

In the exercise of its powers under paragraphs 10 and 12 of the Rules, the Panel has confirmed that there appears to be a business of that name operating a website at "www.medyae.com" which is based in Türkiye and which appears to provide an array of social media management, digital marketing, website design and SEO services¹.

¹ [WIPO Overview 3.0](#), section 4.8.

In the course of the email communications, Mr Baltaci also disclosed that his client already controlled the domain names <rams-global.com>, <ramsturkiye.com> and <ramskz.com>. The first two of these (at least) resolve to websites for a group of companies engaged in property development, construction, tourism, health, mining and other activities under the name “Rams” across a number of countries including Türkiye, Kazakhstan, Germany, Dubai, Thailand, and Iraq.

Given these circumstances, it is not implausible that Mr Baltaci’s client was interested in the disputed domain name. How such an entity apparently arrived at a value of USD 2 million is not something the Panel can assess. There is no reason on the record before the Panel to assume it must have been intending to take advantage of the Complainant’s reputation given that entities in the group trade under the name “Rams”.

The material before the Panel, therefore, does not provide a basis for it to reject the Respondent’s evidence of either the circumstances in which the Respondent became the registrant or the receipt of an offer for the disputed domain name of USD 2 million. The Complainant’s bald assertions do not provide an objective basis for rejecting as fabrications the email chains submitted by the Respondent taking into account also that both chains took place several years apart and involve communications apparently over several weeks if not months. Proceedings under the Policy are proceedings on the papers and there is no basis before the Panel to reject the proffered email chains as anything other than what they appear to be.

That conclusion is reinforced by the apparent existence of genuine businesses involved in the offer of USD 2 million insofar as websites on the Internet go.

Given the Respondent had received what (so far as the Panel can tell on the papers) was a genuine offer for the disputed domain name in the sum of USD 2 million, the Respondent’s conduct in seeking to generate a bidding war over the rights to the disputed domain name of the short, dictionary word with multiple possible uses at issue here cannot be characterised as use in bad faith under the Policy.

As a result, the Complainant has failed to establish the third requirement under the Policy and the Complaint must fail.

For the foregoing reasons, the Complaint is denied.

/Warwick A Rothnie/
Warwick A Rothnie
Presiding Panelist

/Clive N.A. Trotman/
Clive N.A. Trotman
Panelist

/Gerald M. Levine/
Gerald M. Levine
Panelist

Date: December 4, 2025