



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 October 7, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 27, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 30, 2025.

The Center appointed Wilson Pinheiro Jabur as the sole panelist in this matter on November 4, 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 French corporation specialized in the manufacture, marketing and sale of electronic equipment and systems for the aeronautics, naval, and defense sectors. Presently, the Complainant counts with more than 81,000 employees on five continents, having had more than EUR 18.4 billion in revenue.

The Complainant’s official website is available at <thalesgroup.com> and the Complainant is the owner of several trademark registrations for THALES, amongst which (Annex 1 to the Complaint):

- United States of America Trademark Registration No. 3,017,144, for the word mark THALES, registered on November 22, 2005, successively renewed, in classes 9, 35, 38, and 42;
- United States of America Trademark Registration No. 3,087,138, for the word mark THALES, registered on May 2, 2006, successively renewed, in classes 9, 13, 38, 42, and 45; and
- European Union Trademark Registration No. 002186088, for the word mark THALES, registered on November 9, 2006, successively renewed, in classes 9, 13, 16, 35, 38, 41, and 42.

The disputed domain names were registered on the following dates and are presently used in connection with:

<b>Disputed Domain Name</b>	<b>Registration Date</b>	<b>Present Use and at the Time of Filing of the Complaint)</b>
<htalesgroup.com>	February 26, 2025	No active webpage
<rhtalesgroup.com>	February 26, 2025	No active webpage
<rhtalesgroup.com>	February 26, 2025	No active webpage
<tgalesgroup.com>	February 26, 2025	No active webpage
<tghalesgroup.com>	February 26, 2025	No active webpage
<thakesgroup.com>	February 26, 2025	No active webpage
<thaklesgroup.com>	February 26, 2025	No active webpage
<thaleagroup.com>	February 26, 2025	No active webpage
<thaleasgroup.com>	February 26, 2025	No active webpage
<thaledgroup.com>	February 26, 2025	No active webpage
<thaledsgroup.com>	February 26, 2025	No active webpage
<thalegroup.com>	February 26, 2025	No active webpage
<thalersgroup.com>	February 26, 2025	No active webpage



Prior to the filing of the Complaint, the Complainant sent a cease-and-desist letter to the Respondent via the online Whois contact form on May 27, 2025, followed by a reminder on June 17, 2025 (Annex 10 to the Complaint), to which no response was received.

## **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.

Notably, the Complainant asserts to have been initially founded in 1893 under the name "Compagnie Francaise Thomson-Houston", having rebranded as Thales in 2000 and become a global technology leader. The Complainant further asserts to have received various industry awards and recognition for innovation and corporate responsibility including repeated listings in the Thomson Reuters Top 100 Global Innovators and recognition by the Dow Jones Sustainability Index (DJSI) for its strong corporate responsibility policy; also having been recognized by Forbes in a number of Forbes Lists, such as #607 World's Best Employers (2024), #524 Global 2000 (2024), and #202 Canada's Best Employers (2022).

The disputed domain names, according to the Complainant, are purposeful misspellings of the Complainant's unregistered THALES GROUP mark in which it has established significant goodwill and has become a distinctive identifier that consumers associate with the Complainant's offerings through the Complainant's extensive advertisement, promotion and longstanding use and are classic examples of typosquatting and thus must be considered confusingly similar to the Complainant's mark.

The Complainant also submits that the disputed domain names are phonetically similar to the Complainant's THALES trademark and typos of such nature can easily be made by an internet user.

Regarding the absence of the Respondent's rights or legitimate interests, the Complainant argues that:

- i. the Respondent is not sponsored by or affiliated with the Complainant in any way;
- ii. the Complainant has not given the Respondent permission to use the Complainant's trademarks in any manner, including in domain names;
- iii. the Respondent is not commonly known by the disputed domain names;
- iv. the Respondent, at the time of filing the Complaint, was using a privacy protection service, which past panels have also found to equate to a lack of legitimate interest; and
- v. the Respondent is not using the disputed domain names in connection with a bona fide offering of goods or services given that the disputed domain names are being passively held.

Furthermore, the Complainant submits that its trademark is known internationally and the Respondent, by registering 63 typosquatted variations of the Complainant's THALES GROUP mark, as well as its <thalesgroup.com> domain name. In addition to that, the Complainant sustains that it is not possible to conceive of a plausible situation in which the Respondent would have been unaware of the Complainant. Although the disputed domain names are passively held by the Respondent, they will be likely used for email purposes so as to facilitate fraudulent activity such as phishing, impersonation or passing off as the Complainant, given the active mail servers associated with the disputed domain names (Annex 11 to the Complaint). Lastly, according to the Complainant, two other factors corroborate the Respondent's bad faith: the choice to retain a privacy protection service so as to conceal its identity and the lack of reply to the cease-and-desist letters sent prior to this proceeding (Annex 10 to the Complaint).

## **B. Respondent**

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

## **6. Discussion and Findings**

Paragraph 4(a) of the Policy sets forth three requirements which have to be met for this Panel to order the transfer of the disputed domain names to the Complainant:

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

The Complainant must prove in this administrative proceeding that each of the aforesaid three elements is present in order to obtain the transfer of the disputed domain names.

### **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 names. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

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

The disputed domain names either incorporate the entirety of the THALES mark or a misspelled version of the THALES mark. The Panel finds the THALES mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. The addition of the term "group" or a misspelled version of "group" does not prevent a finding of confusing similarity. [WIPO Overview 3.0](#), sections 1.7, 1.8, and 1.9.

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.

The Respondent, in not responding to the Complaint, has failed to invoke any of the circumstances, which could demonstrate, pursuant to paragraph 4(c) of the Policy, any rights or legitimate interests in the disputed domain names. This entitles the Panel to draw any inferences from such default as it considers appropriate, pursuant to paragraph 14(b) of the Rules. Nevertheless, the burden of proof is still on the Complainant to make at least a prima facie case against the Respondent under the second UDRP element.

In that sense, and according to the evidence submitted, there is no evidence that the Respondent has been commonly known by the disputed domain names, and furthermore, the Complainant indeed states that it has not given the Respondent permission to use the Complainant's trademarks in any manner, including in domain names.

In addition to that, the absence of any indication that the Respondent has been commonly known by the disputed domain names, or that it has acquired any registered trademarks or trade names corresponding to the disputed domain names, corroborate with the indication of the Respondent's lack of rights or legitimate interests in the disputed domain names.

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.

The disputed domain names were all registered after the Complainant registered the THALES mark. They are not only confusingly similar to the Complainant's marks but also confusingly similar to the Complainant's domain name <thalesgroup.com>. The disputed domain names do not resolve to any active websites. Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness of the Complainant's trademark, and the composition of the disputed domain names, and finds that in the circumstances of this case the passive holding of the disputed domain names does not prevent a finding of bad faith under the Policy.

The other factors corroborate the finding of the Respondent's bad faith conduct in this case: the use of the privacy protection service in registering the disputed domain names and the lack of reply to the cease-and-desist letters sent prior to this proceeding.

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

