

ADMINISTRATIVE PANEL DECISION

Employment Universe, Inc. v. Fernando Ignacio, aiCarousels AB
Case No. D2025-4760

1. The Parties

The Complainant is Employment Universe, Inc., United States of America (“United States”), internally represented.

The Respondent is Fernando Ignacio, aiCarousels AB, Sweden.

2. The Domain Name and Registrar

The disputed domain name <resumemaker.online> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 17, 2025. On November 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 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 (Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 19, 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 November 20, 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 November 27, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 17, 2025. The Response was filed with the Center on December 10, 2025. The Respondent sent the email communications to the Center on November 19, 2025, November 27, 2025.

The Center appointed John Swinson, Paul M. DeCicco and Tony Willoughby as panelists in this matter on January 21, 2026. 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 a Delaware corporation, headquartered in Truckee, California, United States.

The Complainant operates a website at <resumemaker.com> which can be used to generate resumes.

According to this website, the Complainant is a boutique, angel investment firm with a singular focus: HR Technology.

The Complainant's website also states: "For over 20 years, we've been the #1 best-selling resume writing app. We've helped millions land their dream jobs. And, we've rebuilt ResumeMaker from the ground up with powerful AI to make writing the perfect resume faster and easier than ever."

A company called Individual Software, Inc. is the registered owner of United States Trademark Number 2936409 for RESUMEMAKER for "Computer software for creating resumes, and instruction and user manuals sold in connection therewith". This registration has a registration date of March 29, 2005. The registration claims a date of first use of December 1989. (The Complaint provides different information, stating that "The RESUMEMAKER mark has been used extensively and continuously in commerce since 1995 in connection with professional resume building services.")

On November 30, 2024, Individual Software, Inc. granted a two-year exclusive license to the Complainant to the RESUMEMAKER trademark and other assets, with an option to purchase these assets at the end of the two-year term. This is set out in a Master License Agreement and corresponding order form which is not a typical trademark license. For example, there are no quality control provisions in this license.

The disputed domain name was registered on July 28, 2018.

At the time of this decision, the website at the disputed domain name provides online services to use AI to create resumes. The title of the website is "Free Resume Builder & CV Maker Online (Powered by AI ✦)". The website primarily uses the term "resume builder" rather than "resumemaker" in the headings and text of the website at the disputed domain name.

The Respondent is a Swedish company and operates a cloud-based platform for making resumes at the disputed domain name. The Respondent first provided such online services in August 2018.

The Respondent's online platform was voted "#1 Product of the Week" on Product Hunt at launch.

In 2024, the Respondent applied to register a mark incorporating "ResumeMaker.Online" in Sweden (Application No. 2024 01748). The Swedish Patent and Registration Office (PRV) refused the application on the basis that the mark lacks distinctiveness and that consumers would perceive it merely as a description of the services.

Between November 6, 2025 and November 27, 2025, the Complainant issued various correspondence to the Respondent and its suppliers, including a proposal for a "collaboration", a cease and desist demand, and an offer to acquire the disputed domain name.

For example, on November 6, 2025, the Complainant sent a LinkedIn message to the Respondent titled "Exciting collaboration opportunity" proposing a "partnership opportunity" that would be "mutually beneficial" "rather than send this to our law firm to have your product shut down and seek damages on infringement for sales we've lost here in the US." The message suggested a Zoom meeting to discuss options.

The next day, on November 7, 2025, the Complainant sent a follow up email to the Respondent stating "... since I haven't heard from you, we will begin the legal process to protect the trademark ResuMaker on Monday...". As far as the Panel is aware, no such legal process eventuated (other than the present dispute under the Policy).

On November 7, 2025, the Complainant also emailed a more formal "cease and desist demand" to the Respondent, alleging trademark infringement. The correspondence did not refer to the Policy but threatened a "a federal lawsuit for trademark infringement and unfair competition", presumably in the United States.

The Complainant also sent this letter (or a version of it) to the Respondent's payment processing provider, Outseta. On November 12, 13 and 27, 2025, the Complainant sent further emails to Outseta requesting that Outseta turn off the payment processing services to the Respondent and threatening substantial damages against Outseta if they did not. In December 2025, Outseta's legal counsel communicated to the Complainant stating, in part, that "the effort to broaden your allegations [against Outseta alleging a pattern of misconduct by Outseta] reads less like a legal argument and more like an attempt to pressure Outseta by proxy while your negotiations with [the Respondent] continue. We will not be responding further."

On November 16, 2025, the Complainant offered to purchase the disputed domain name from the Respondent for USD 1,500.

According to the Respondent, originally the header of the website at the disputed domain name was "RM.O" and then later "ResumeMaker.Online" (but not "ResumeMaker" without the "Online") to reflect the disputed domain name. The Respondent called this "a common 'domain-as-brand' naming convention (for example, Booking.com or Hotels.com), where the URL itself serves as the primary identifier." As a result of the correspondence discussed above, and also at Outseta's request, the Respondent removed "ResumeMaker.Online" labels from the header, added a non-affiliation disclaimer on the website at the disputed domain name and revised the terms of service for the Respondent's service.

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 name.

In summary, the Complainant makes the following submissions:

The RESUMEMAKER mark has been used extensively and continuously in commerce since 1995 in connection with professional resume building services.

The trademark owner, Individual Software, Inc., has made substantial financial and labour investments to develop, market, and protect this valuable brand asset, thereby creating substantial consumer goodwill associated exclusively with the RESUMEMAKER mark.

A directly competing business is being operated under the confusingly similar domain name, being the disputed domain name, offering a nearly identical AI resume writing product.

The visual display of the RESUMEMAKER mark may have been recently removed from the website and emails at the disputed domain name. This action does not cure the infringement. Rather, the removal of the visual mark from the website at the disputed domain name, while retaining the disputed domain name, should be interpreted as a clear admission of guilt and acknowledgment of the unlawfulness of the prior activity. The continued use of the disputed domain name as the URL for the website alone is sufficient to perpetuate consumer confusion.

The unauthorized use by the Respondent constitutes a clear and unequivocal case of trademark infringement, unfair competition, and cybersquatting under federal and state law (specifically, Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1), Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), and Section 43(d) of the Lanham Act, 15 U.S.C. §1125(d)).

The use of the RESUMEMAKER mark on the website at the disputed domain name is guaranteed to cause confusion, mistake, or deception among consumers, given the identical federally registered mark, identical products, and bad faith intent.

The Respondent has never been affiliated with, sponsored by, or licensed to use the RESUMEMAKER mark by Individual Software, Inc., or the Complainant. The Respondent has no prior trademark rights in the RESUMEMAKER mark and is not commonly known by this name.

This bad faith is demonstrated by the following facts. The disputed domain name is identical to Individual Software, Inc.'s registered trademark for RESUMEMAKER. The services offered by the Complainant and the Respondent (AI resume writing products) are identical. There is a clear intent to divert consumers from the Complainant's website for commercial gain by creating a likelihood of confusion regarding source and sponsorship. The knowledge of the long-standing use (since 1995) of the RESUMEMAKER mark and its federal registration at the time the disputed domain name was registered.

B. Respondent

The Respondent contends that the Complainant has not satisfied the second and third elements required under the Policy for a transfer of the disputed domain name.

In summary, the Respondent makes the following submissions:

The disputed domain name consists of ordinary English dictionary words that directly describe the service provided at the Respondent's website. In practice, "resume maker" is widely used in the marketplace as a generic or descriptive term for a category of resume tools. The Complainant now seeks to use a weak, descriptive mark with limited scope to capture a plainly descriptive domain name, after first approaching the Respondent with "collaboration" and "merger or acquisition" proposals, then following up with threats of treble damages and substantial legal fees and only turning to the Policy when no deal was reached. The evidence shows the Complainant is attempting to use the Policy as a commercial bargaining tool, not to remedy cybersquatting.

The phrase "resume maker" is widely used across the human resources and recruitment technology sector as a descriptive term for tools that help users create resumes and CVs. It has been used this way for many years, including well before 2018 when the Respondent registered the disputed domain name.

At the time of registration of the disputed domain name, the Complainant's offering consisted primarily of a United States product line of legacy boxed and downloadable desktop software, and its RESUMEMAKER trademark registration is limited to Class 9 for such installed, boxed style software products, not to the online style resume services that the Respondent provides.

The Respondent adopted the disputed domain name because "resume maker" describes a tool for making resumes, not to target the Complainant's Class 9 boxed desktop software. The Respondent has operated this bona fide modern cloud service continuously for more than seven years, relying on the descriptive meaning of the words "resume" and "maker" to reach users seeking that type of tool, not the Complainant's legacy product.

The Respondent relies on Paragraph 4(c)(i) of the Policy.

WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 2.10, confirms that where a domain name consists of dictionary terms and is used genuinely for its descriptive meaning, this may support a finding of rights or legitimate interests. The Respondent's use of

disputed domain name to describe and identify its own resume-making service falls squarely within that principle.

The Complainant's entire case rests on the unsupported assumption that the Respondent registered the disputed domain name with the Complainant specifically in mind. The assumption is implausible given the descriptive nature of the term and the parties' entirely different markets, geographies and business models. "Resume maker" is not a distinctive or globally recognized brand. The Complainant attempts to treat its generic (and at best, descriptive) mark as if it possessed the fame of a coined term. In reality, "resume maker" is a straightforward English phrase that describes what the software does. There is no evidence that the Complainant's legacy boxed and downloadable desktop product, sold primarily in United States retail channels, enjoyed any reputation in 2018 that would make it known to a developer based outside the United States selecting a descriptive name for an online tool.

The Complainant provides no evidence of actual confusion: no surveys, no misdirected enquiries and no proof that consumers searching for "resume maker" associate the phrase exclusively with the Complainant.

The Respondent has operated under the disputed domain name since 2018, and the Complainant (or its predecessor) waited approximately seven years to make a complaint.

Delay alone is not a formal defense under the Policy, but in a case where the disputed domain name has been openly used for years for a descriptive service, such a long delay undermines any claim of obvious, intolerable confusion. If the Respondent's use truly caused severe and immediate harm, it is hard to explain the years of inaction.

The Respondent requests a finding of Reverse Domain Name Hijacking including because the Complainant knew or should have known it could not succeed under any reasonable interpretation of the Policy. The Complaint was brought primarily to harass the Respondent. The Complainant uses the Policy as a "Plan B" after failing to acquire the disputed domain name through negotiation.

C. Supplemental Submission

The Complainant filed a supplemental submission.

Paragraphs 10 and 12 of the Rules grant the Panel sole discretion to determine the admissibility of unsolicited supplemental filings. While paragraph 10(d) states that: "The Panel shall determine the admissibility, relevance, materiality and weight of the evidence", paragraph 12 provides that: "In addition to the complaint and the response, the Panel may request, in its sole discretion, further statements or documents from either of the Parties". As a general matter, unsolicited supplemental filings are generally discouraged, unless specifically requested by the panel.

The Complainant has not shown reasons that convince the Panel that a supplemental submission is warranted or that there are exceptional circumstances in this case. The submissions and the additional evidence provided, if relevant, should have been provided in the Complaint. The supplemental submission also makes broad statements, similar to those made in the Complaint, that are not supported by evidence, such as "Given ResumeMaker.com's 25-year market presence and documented brand dominance, it is implausible that Respondent was unaware of Complainant's established brand when selecting its domain name." Such statements are unhelpful.

Whether or not the Panel considered the supplemental submission outside of making a determination as to whether or not the submission should procedurally be accepted, the result would not differ because the supplemental submission did not provide new arguments to address the issues discussed below that the Panel decides against the Complainant.

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements enumerated in paragraph 4(a) of the Policy have been satisfied, namely:

- (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.

The onus of proving these elements is on the Complainant.

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.

An exclusive licensee is considered to have rights in a trademark for the purposes of standing to file a complaint under the first element of the Policy. See [WIPO Overview 3.0](#), section 1.4; and *Normani GmbH v. Privacy Administrator, Anonymize, Inc. / Stanley Pace*, WIPO Case No. [D2020-2353](#).

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

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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, any of which (if found by the Panel to be proved) shall demonstrate that the Respondent has rights or legitimate interests in respect of 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.

The Panel finds that, before notice to the Respondent of the dispute, the Respondent used the disputed domain name in connection with a bona fide offering of services. [WIPO Overview 3.0](#), section 2.2.

Since 2018, the Respondent offered an online resume building platform using the disputed domain name. The Respondent provided substantial evidence of such use by the Respondent, including third party awards and other promotion and publicity. The Respondent's platform was a bona fide offering of services. As discussed below in respect of the third element, there is no evidence that the Respondent registered the disputed domain name to take advantage of the Complainant's reputation.

There is additional evidence of legitimate interests of the Respondent. For example, the Respondent's founder did not hide his identity, was easily contacted by the Complainant via LinkedIn, and appeared personally in media and promotional activities. The Respondent's founder was interviewed by Starter Story, a well-known platform for profiling founders, and the Respondent's evidence shows that the accompanying video has accumulated over 300,000 views on YouTube. A founder who openly discusses his business model and growth strategy in widely viewed public forums is not behaving like a cybersquatter.

Furthermore, the Respondent has the right to use common dictionary words to describe the contents of its website using its domain name providing that he is not trading off the Complainant's mark.

The Panel finds the second element of the Policy has not been established.

C. Registered and Used in Bad Faith

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 evidence in the case file as presented does not indicate that the Respondent's aim in registering the disputed domain name was to profit from or exploit the Complainant's trademark.

The Panel reaches this conclusion for several reasons.

Based on the materials provided by the Respondent, the term "resume maker" is a common term used in the industry to describe the services of the kind provided by the Respondent. For example, Marketing pages from Microsoft, Canva, Zety, VisualCV, and other third parties using "resume maker" generically for resume tools. Google and Amazon search results showing numerous products titled or described as resume maker. Moreover, the Swedish Patent and Registration Office also came to this same conclusion in 2024 as referred to in Section 4 above.

The Respondent is located in Sweden. The Complainant is located in the United States (and has been licensed a United States trademark registration but has no registered trademark rights in other countries). There is no evidence before the Panel that the Respondent targeted its service at customers in the United States. The Complainant provided no evidence of its reputation, in the United States or anywhere else, particularly in Sweden, or in 2018 (when the disputed domain name was registered) or at the present time. There is no evidence that the Respondent would have been aware of the Complainant when selecting and registering the disputed domain name in 2018. The Respondent states that it chose the disputed domain name as a descriptive term for a legitimate business related to the meaning of that descriptive term. There is no evidence that the Complainant's product, which appears to have been sold primarily in United States retail channels in 2018, enjoyed any reputation in 2018 outside the United States that would make it known to a developer based outside the United States selecting a descriptive name for an online tool.

The Complainant asserts that its "continuous and prominent use [of the RESUMEMAKER mark] over three decades has resulted in the mark achieving significant market recognition" but no evidence of any such reputation (in 2018 or the present day) has been provided in the Complaint.

An asserting party needs to establish that it is, more likely than not, that the claimed fact is true. An asserting party cannot meet its burden by simply making conclusory statements unsupported by evidence. To allow a party to merely make factual claims without any supporting evidence would essentially eviscerate the requirements of the Policy as both complainants or respondents could simply claim anything without any proof. For this reason, UDRP panels have generally dismissed factual allegations that are not supported by any bona fide documentary or other credible evidence. *Captain Fin Co. LLC v. Private Registration, NameBrightPrivacy.com / Adam Grunweg*, WIPO Case No. [D2021-3279](#).

Moreover, the Complainant's mark is not inherently distinctive. It is a highly descriptive mark. The term "resume maker" is inherently attractive as a domain name for a resume making service. Based on the

evidence before the Panel, the Panel cannot infer that the Respondent knew or should have known that the Complainant had rights in RESUMEMAKER that would prevent the Respondent from registering and using the disputed domain name in good faith.

The Complainant relies on recent changes made by the Respondent to the website at the disputed domain name as evidence to support bad faith. The evidence shows that such changes were made by the Respondent, on a “without admissions” basis, to assist the Respondent’s payment service provider who was also being attacked by the Complainant. This is evidence of good faith conduct by the Respondent, not a bad faith admission.

In short, there is no evidence of the targeting of the Complainant or its trademark by the Respondent.

The Panel finds the third element of the Policy has not been established.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.0](#), section 4.16.

The Respondent asks for a finding of Reverse Domain Name Hijacking.

The Panel makes such a finding for the following reasons.

First, the Complainant made an unsuccessful pre-filing attempt to buy the disputed domain name from the Respondent.

Second, the Complainant provided selective correspondence to the Panel and did not disclose its pre-filing attempt to buy the disputed domain name from the Respondent or its correspondence with the Respondent’s payment service provider.

Third, the Complainant appears to be undertaking a campaign to harass and pressure the Respondent to sell the disputed domain name to the Complainant. Applying pressure against the Respondent’s payment service provider to stop processing payments to the Respondent is an example of this.

Fourth, the Respondent has been operating its business appropriately and legitimately since 2018. The Complainant provided no reason for its over seven-year delay in bringing this claim.

Fifth, even with a cursory review of the facts before filing the Complaint, the Complainant should have realized it had no chance of success in respect of the second element of the Policy. The Complainant was clearly aware of the Respondent’s business and had made a proposal for a “partnership opportunity” between the Complainant and the Respondent. In view of the facts known to the Complainant, the Complainant clearly ought to have known it could not succeed under any fair interpretation of facts reasonably available prior to the filing of the Complaint. (If the proposal for “partnership opportunity” was not a real proposal, then that itself is evidence of bad faith conduct.) Once the Complainant received the Response, the weakness of the Complaint should have become obvious to the Complainant, and the Complainant should have withdrawn the Complaint at that time. The Complainant knew or should have known that it could not possibly succeed as to the second and third elements of the Policy given the fact that “resume maker” is composed of common dictionary words describing the Respondent’s product. See [WIPO Overview 3.0](#), section 4.16. Instead, the Complainant doubled down and filed additional submissions.

Sixth, as discussed above, the Complainant made submissions without providing evidence to support the submissions. The substantive body of the Complaint was less than 2 pages.

Seventh, the Complaint cites no prior cases under the Policy and makes no reference to [WIPO Overview 3.0](#) or similar. The Complaint makes submissions about U.S. trademark law that have no relevance to the Policy. The substantive body of the Complaint was less than 2 pages. The Complaint appears to have been written by AI.

The Panel finds that the Complaint has been brought in bad faith and constitutes an attempt at Reverse Domain Name Hijacking.

7. Decision

For the foregoing reasons, the Complaint is denied.

/John Swinson/
John Swinson
Presiding Panelist

/Paul DeCicco/
Paul DeCicco
Panelist

/Tony Willoughby/
Tony Willoughby
Panelist
Date: February 2, 2026