

## **ADMINISTRATIVE PANEL DECISION**

G4S Limited v. Idah Idah  
Case No. D2025-0625

### **1. The Parties**

The Complainant is G4S Limited, United Kingdom (“UK”), represented by SafeNames Ltd., UK.

The Respondent is Idah Idah, United States of America (“USA”).

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

The disputed domain names <g4sriskmangement.com> and <g4sriskmangement.pro> are registered with Name.com, Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 17, 2025. On February 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On February 18, 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 (“Redacted For Privacy, Domain Protection Services, Inc.”) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 20, 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 February 24, 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 March 5, 2025. In accordance with the Rules, paragraph 5, the due date for Response was March 25, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 28, 2025.

The Center appointed Mladen Vukmir as the sole panelist in this matter on April 2, 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 UK-based global security company which provides security and facility services in around 90 countries across the world.

The Complainant is the owner of numerous G4S trademarks registered in various jurisdictions, including G4S International Registration number 885912 registered on October 11, 2005, for goods and services in Classes 1, 5, 6, 9, 16, 35, 36, 37, 38, 39, 41, 42, 44, and 45 of International Classification (“IC”), G4S trademark registered in the European Union on September 20, 2016, under the registration number 015263064 for goods and services in Classes 6, 36, and 37, and G4S trademark registered in the USA on February 5, 2008, under the registration number 3378800, for goods and services in Classes 1, 5, 6, 9, 16, 35, 36, 37, 38, 39, 41, 42, 44, and 45 of IC (“G4S trademark”).

The Complainant is the owner of the domain name <g4s.com> registered on December 1, 1999, which resolves to the Complainant’s main website, as well as a number of country-code Top-Level domain names, including <g4s.cz> registered on January 27, 2003, <g4s.us> registered on November 17, 2004, <g4s.cn> registered on March 1, 2005.

The Complainant’s wholly owned subsidiary G4S Risk Management Limited operates the website created under the domain name <g4sriskmanagement.com>.

The disputed domain names were registered on December 1, 2024, and initially resolved to websites which contained Pay-Per-Click (“PPC”) links some of which redirected Internet users to offerings related to the Complainant’s offerings. The disputed domain names then started to redirect to landing pages that purported to offer license renewal of a virus scanning software.

#### **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 contends that:

(i) The Complainant was initially founded in 1901. In 2021, the Complainant was acquired by Allied Universal, presently has a network of more than 800,000 employees globally, and now operates under the name G4S Limited. The Complainant offers a diverse range of services, broadly divided into the categories of ‘Security Solutions’, ‘Cash Solutions’, ‘Consulting Services’, ‘Care and Justice Services’ and the ‘G4S Academy’. The Complainant also provides tailored country-specific services across different industry sectors. These include courier-related services, as well as offerings for the sectors of retail and financial institutions. The Complainant has delivered consultancy and training on projects in over 125 countries. The Complainant has acquired widespread consumer goodwill, having operated for over a century and under G4S brand for more than 20 years. The Complainant has established a strong social media presence (Facebook, X/Twitter, LinkedIn, Instagram, YouTube) and uses G4S trademark to promote its services.

(ii) The disputed domain names are confusingly similar to the Complainant's G4S trademark. The disputed domain names include the entirety of G4S trademark with the addition of words "risk" and "mangement" (a misspelling of word "management"). The addition of words "risk" and "mangement" does not dispel the confusing similarity between the Complainant's G4S trademark and the disputed domain names, in fact it reinforces the connection to the Complainant, given its subsidiary G4S Risk Management. In earlier UDRP decisions the Complainant's reputation and goodwill in G4S trademark have been recognized.

(iii) The Respondent lacks rights or a legitimate interests in the disputed domain names. To the best of the Complainant's knowledge, the Respondent does not have any trademark rights nor retains any unregistered trademarks to the words used in the disputed domain names. The Respondent is not commonly known by the terms "g4sriskmangement" or G4S, not is offering any genuine goods or services under said terms. The Respondent has not received any license from the Complainant to use domain names featuring G4S trademark. The term "G4S" has no generic or ordinary meaning, nor is commonly understood three-character abbreviation for any purpose other than to signify the Complainant. The Respondent has not used, nor prepared to use the disputed domain names in connection with a bona fide offering of goods and services. The Respondent is not making a legitimate noncommercial or fair use of the disputed domain names in any way but to target the Complainant and profit from the association with G4S trademark;

(iv) The Respondent registered and is using the disputed domain names in bad faith. The Complainant's G4S trademarks predate the creation of the disputed domain names by at least 19 years. The G4S brand has accrued substantial goodwill and a global reputation in the security and risk management industry since its establishment. The disputed domain names replicate G4S trademark with words "risk" and "mangement" (misspelling of management) to emulate the Complainant's G4S Risk Management subsidiary and services, and such use makes it implausible that the Respondent was unaware of the Complainant's G4S brand and its offering when registering the disputed domain names. By registering the disputed domain names to host PPC links that redirect to related and unrelated offerings to the Complainant, the Respondent has intentionally attempted to attract, for commercial gain online users by creating a likelihood of confusion with the Complainant's G4S trademark. The Respondent has used G4S trademark to divert Internet users to third party websites in the hope of deriving financial benefit from users who intended to reach the official G4S Risk management website. The Respondent, in hopes of Internet users misspelling the Complainant's risk management offerings, is using the disputed domain names to redirect Internet users to malicious software, for example, redirecting to landing pages that purport to be a virus scanning software with pop-ups stating that the subscription has expired and providing a button labelled "Renew Licence". The Complainant notes the Respondent's activation of mail exchange (MX) records for the disputed domain names, and states that the presence of MX records suggests the Respondent has the capability to engage in phishing activity through email distribution.

## **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 shown rights in respect of a trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the G4S trademark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy.

[WIPO Overview 3.0](#), section 1.7.

The disputed domain names consist of the Complainant's G4S trademark, and the descriptive terms "risk" and "mangement" (which is, in this Panel's view, a misspelling of word "management"). Where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, meaningless, or otherwise), would not prevent a finding of confusing similarity under the first element. [WIPO Overview 3.0](#), section 1.8.

The generic Top-Level Domains ("gTLD") ".com" and ".pro" in the disputed domain names are viewed as a standard registration requirement and should thus be disregarded under the confusing similarity test.

[WIPO Overview 3.0](#), section 1.11.1.

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 Complainant has not authorized the use of G4S trademark, nor is the Respondent a licensee. There is no indication that the Respondent is commonly known under the disputed domain names. There is no evidence or otherwise apparent to the Panel that the Respondent has been using the disputed domain names in connection with a bona fide offering of goods or services or making a legitimate noncommercial or fair use of the disputed domain names.

The nature of the disputed domain names, consisting of the Complainant's well known G4S trademark in its entirety, indicates the Respondent's awareness of the Complainant, its G4S trademark and subsidiary G4S Risk Management.

In this Panel's view, the Respondent's use of the disputed domain names is to divert traffic to a website hosting PPC links that redirect to related and unrelated offerings to the Complainant. The Respondent created a risk of implied affiliation or association with the Complainant, which does not support a finding of any rights or legitimate interests in this case. [WIPO Overview 3.0](#), section, 2.5.1.

Furthermore, the Respondent was using the disputed domain names to redirect Internet users to malicious software (landing pages that purport to be a virus scanning software with pop-ups stating that the subscription has expired and providing a button labelled "Renew Licence"). Panels have held that the use of

a domain name for illegal activity here, distributing malware, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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 Respondent's actions regarding the registration and use of the disputed domain names demonstrate bad faith. The Complainant's trademarks were registered well before the disputed domain names, and the Respondent has never received authorization from the Complainant to use the G4S trademark or to register the disputed domain names. The terms "risk" and "mangement" that the Respondent added to the disputed domain names (following the Complainant's G4S trademark) are related to the industry in which the Complainant is active and where it has a reputation. The Respondent registered the disputed domain names to host PPC links that redirect to related and unrelated offerings to the Complainant, and has used the G4S trademark to divert Internet users to third party websites, and was using the disputed domain names to redirect Internet users to malicious software. The Respondent activated mail exchange (MX) records for the disputed domain names, which provides the Respondent with the possibility to engage in phishing activity, presenting an implied ongoing threat to the Complainant.

This Panel accepts that the G4S brand has accrued substantial goodwill and a global reputation in the security and risk management industry. The disputed domain names replicate the G4S trademark with the words "risk" and "mangement" (misspelling of word management). In this Panel's view it is highly unlikely that the Respondent was unaware of the Complainant, its G4S trademarks and subsidiary G4S Risk Management when registering the disputed domain names. The Complainant's subsidiary G4S Risk Management operates the website created under the domain name <g4sriskmanagement.com> which is almost identical to the disputed domain names. The only difference is that the letter "a" is missing in the disputed domain names (misspelling of the word "management"). The Respondent's choice to register domain names that entirely incorporate the Complainant's G4S trademark, without any authorization from the Complainant, strongly indicates an intent to exploit the Complainant's established reputation and goodwill. In this Panel's view, the Respondent has, by registering the disputed domain names, intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant and its G4S trademark.

Panels have held that the use of a domain name for illegal activity here, distributing malware, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds that the Respondent's registration and use of the disputed domain names constitute bad faith under the Policy.

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 <g4sriskmangement.com>, and <g4sriskmangement.pro> be transferred to the Complainant.

*/Mladen Vukmir/*

**Mladen Vukmir**

Sole Panelist

Date: April 16, 2025