

ADMINISTRATIVE PANEL DECISION

G4S Limited v. Domain Privacy, Domain Name Privacy Inc.

Case No. D2025-0768

1. The Parties

The Complainant is G4S Limited, United Kingdom, represented by SafeNames Ltd., United Kingdom.

The Respondent is Domain Privacy, Domain Name Privacy Inc., Cyprus.

2. The Domain Name and Registrar

The disputed domain name <g4ssecuresolutions.com> is registered with Tucows Domains Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 25, 2025. On the same day, the Center sent an email to the Registrar requesting information in connection with the disputed domain name. On February 25, 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 (Contact Privacy Inc. Customer 0173326845) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 27, 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 28, 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 Simone Lahorgue Nunes as the sole panelist in this matter on April 8, 2025. The Panelist finds that it was properly constituted. The Panelist 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 London-based global security company, which provides security and facility services in around 90 countries across the world. The company was founded in 1901, and “has been operating under its current name, *G4S (or Group 4 Securicor)* since 2004, when *Group 4 Falck and Securicor* merged. In 2021, the Complainant was acquired by *Allied Universal*”. According to the Complainant, the company has a network of more than 800,000 employees globally and has a number of subsidiaries and one of the Complainant’s core divisions includes G4S Secure Solutions.

Pursuant to the Complainant, the company has acquired widespread consumer goodwill, having operated for over a century and under the G4S brand for more than 20 years.

The Complainant has provided evidence of being the right holder of the trademark G4S in several jurisdictions. For instance, in the United States of America, the registration date is February 5, 2008, and the registration number is 3378800; in the European Union, the registration date is September 20, 2016, and the registration number is 015263064; and the International registration date is October 11, 2005, and the registration number is 885912.

Furthermore, the Complainant uses its main website “www.g4s.com” (registered on December 1, 1999), to promote its global offerings and also holds several domain names incorporating the G4S Trademark, including <g4s.com>, <g4s.cz>, <g4s.us>, <g4s.cn>, and <g4s.in>. The Complainant’s social media presence under the G4S Trademark extends to Facebook, X/Twitter, LinkedIn, Instagram and YouTube.

The disputed domain name was registered on November 24, 2024.

The Complainant provided a screenshot of a website showing that the Respondent is using the disputed domain name to host Pay-Per-Click (PPC) links, and at the bottom of the page is a link that states “[t]he domain g4ssecuresolutions.com may be for sale. Click here to inquire about this domain”. When visitors click on the link they are redirected to a page offering the disputed domain name for sale.

The Complainant sent out a cease and desist letter to the Respondent on January 9, 2025.

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

5. Parties’ Contentions

A. Complainant

The Complainant contends that the disputed domain name is identical or confusingly similar to the trademark G4S. The Complainant alleged that “the Disputed Domain Name includes the entirety of the G4S mark with the addition of the words ‘secure’ and ‘solutions’”. According to the Complainant the incorporation of the entirety of a complainant’s trademark in a domain name is “sufficient to establish identical or confusing similarity”. Furthermore, “the addition of these words reinforces the connection to the Complainant, given the Complainant is also known by their division, *G4S Secure Solutions*”.

The Complainant states that the Respondent seeks to imitate the Complainant by registering a domain name that precisely corresponds to one of its business divisions, with the intent to mislead Internet users attempting to access its website.

Furthermore, the Complainant argues that “[t]o the best of the Complainant’s knowledge, the Respondent does not have any trademark rights nor retains any unregistered trademarks to the terms used in the Disputed Domain Name”.

The Complainant states that the Respondent has not received any license from the Complainant to use domain names featuring the G4S trademark.

The Complainant alleges that the “term ‘G4S’ has no generic or ordinary meaning, nor is it a commonly understood three-character abbreviation for any purpose other than to signify the Complainant”.

The Complainant affirms that “the Respondent has not used, nor prepared to use, the Disputed Domain Name in connection with a bona fide offering of goods or services” and “highlights that the Respondent is using the Disputed Domain Name to host Pay-Per-Click (PPC) links that redirect Internet users to offerings related and unrelated to the Complainant’s offerings”.

Moreover, the Complainant contends that the disputed domain name “comprises PPC links to ‘Security Services’, ‘Risk Management’, ‘Security Technology’, and ‘Remote Jobs’”. In that regard, they have pointed out that “Panels have found that ‘the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links capitalize on the reputation and goodwill of the complainant’s mark’”.

The Complainant reports that the “use of the G4S mark in the Disputed Domain Name and security-related links show the Respondent’s intentions to generate increased traffic and clicks through the use of the Complainant’s G4S mark, as users may have perceived that they are entering a site associated with the Complainant when this is not the case”.

In addition, the Complainant contends that [o]n the landing webpage, there is a prompt at the footer of the site that states: “The domain g4ssecuresolutions.com may be for sale. Click here to inquire about this domain”, where Internet users are redirected to an offer for sale webpage on domaineasy.com where the Disputed Domain Name is listed for sale for \$1389 USD.” According to the Complainant “[l]isting a domain name for sale for a price that far exceeds reasonable out-of-pocket costs does not represent a bona fide offering” and the “Respondent seeks to capitalise on the value and reputation of the G4S mark by offering it for an excessive price which cannot give rise to a legitimate interest”.

In this sense, the Complainant argues that the Respondent has used the G4S mark in a deceptive manner to divert Internet users, with the intention of increasing traffic to its website and exploiting the resulting confusion of users attempting to access the Complainant’s services.

The Complainant points out that “[s]earching ‘G4S’ and ‘g4ssecuresolutions’ on popular search engines such as *Google*, clearly list the Complainant and its services as the top result”.

Furthermore, the Complainant informs “the Respondent’s activation of mail exchange (MX) records for the Disputed Domain Name”. Additionally, the Complainant affirms “that the Respondent has the capability to engage in phishing activity through email distribution. The composition of the Disputed Domain Name gives an implied affiliation with the Complainant’s G4S trademark, which can consequently be used to target the Complainant’s unsuspected customers. The presence of MX records has been found by panelists in previous disputes to evidence bad faith”.

Moreover, the Complainant argues that “the Respondent’s attempts at concealing its identity even after the registrar’s data disclosure is further evidence of bad faith”.

Finally, the Complainant requests the transfer of the disputed domain name to the Complainant.

B. Respondent

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

6. Discussion and Findings

The analysis of the Complainant's arguments and of the presented evidence leads to the conclusion that the Complaint should be upheld, based on the following grounds:

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 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 confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms here, "secure" and "solutions" may bear on assessment of the second and third elements, the Panelist finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Panelist 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.

As asserted by the Complainant, the Panelist notes that the Respondent appears to not hold any trademark rights to the G4S term. There is also no evidence that the Respondent retains unregistered trademark rights to the term G4S. Neither has the Respondent received any license from the Complainant to use domain names featuring the G4S trademark. All active trademarks for the term G4S are held by the Complainant.

Having reviewed the available record, the Panelist finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name. The Respondent has not rebutted the Complainant's prima facie showing and has not come forward with any evidence

demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

Panels have held that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant's mark or otherwise mislead Internet users. [WIPO Overview 3.0](#), section 2.9.

In light of these factors, the Panelist finds the second element of the Policy has been met.

C. Registered and Used in Bad Faith

The Panelist notes that, for the purpose of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the same 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 Panelist notes the Respondent's bad faith registration and mentions three circumstances documented by the Complainant, namely:

First, the Respondent has registered or has acquired the disputed domain name primarily for the purpose of selling the disputed domain name registration to the Complainant or to a competitor of the Complainant, for valuable consideration in excess of documented out-of-pocket costs directly related to the disputed domain name;
Second, the Respondent never replied to the cease and desist letter sent by the Complainant;
Third, the Respondent activated a MX record for the disputed domain name, which is identical to the name of one of the Complainant's core divisions;
Fourth, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its web site or other on-line location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of its web site.

Having reviewed the record, the Panelist finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

The Panelist 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 Panelist orders that the disputed domain name <g4ssecuresolutions.com> be transferred to the Complainant.

/Simone Lahorgue Nunes/

Simone Lahorgue Nunes

Sole Panelist

Date: April 22, 2025