

ADMINISTRATIVE PANEL DECISION

G4S Limited v. Name Redacted

Case No. D2025-1067

1. The Parties

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

The Respondent is Name Redacted¹.

2. The Domain Name and Registrar

The disputed domain name <g4s-solutions.com> is registered with Squarespace Domains II LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 14, 2025. On March 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 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 (G4S secure solution / REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 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 March 25, 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”).

¹ Respondent appears to have used the name of the Complainant’s employee when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted Respondent’s name from this decision. However, the Panel has attached as Annex 1 to this decision an instruction to the Registrar regarding transfer of the disputed domain name, which includes the name of Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on March 26, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 15, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 22, 2025.

The Center appointed Daniel Kraus as the sole panelist in this matter on May 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 London-based global security company which provides security and facility services in around 90 countries across the world. Initially founded in 1901, the Complainant 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 and presently has a network of more than 800,000 employees globally. The Complainant is no longer publicly traded 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 has one core division named "G4S Secure Solutions". It has a notable presence in Colombia, Finland, Hong Kong, China, Japan, Taiwan and in the United Kingdom through G4S Secure Solutions (UK) Ltd. This division is referred to simply as G4S, utilizing the Complainant's official website to direct users to country-specific pages corresponding to the locations of Secure Solutions. The Complainant's Secure Solutions division is a provider of integrated security services offering solutions to governments, businesses, and individuals worldwide.

The Complainant has registered numerous trademarks for the G4S term, and these cover a wide range of jurisdictions. The Complainant notes that some of its trademarks were registered under the name and address of its previous corporate identity (i.e., G4S plc) before it was registered as G4S Limited. The Complainant holds various registrations of the trademark G4S, including: United States Patent and Trademark Office Reg. No. 3,378,800, registered on February 5, 2008, in connection with, among other things, "computer hardware and software for security systems" and "security services for the protection of persons and goods"; International Reg. No. 885912, registered on October 11, 2005; and European Union Reg. No. 015263064, registered on September 20, 2016. The Complainant also maintains a social media presence. For example, its Facebook page has more than 475,000 followers, and its LinkedIn page has more than one million followers.

The disputed domain name was registered on January 28, 2025. The disputed domain name resolves to a passively held parked website which states "we're under construction. Please check back for an update soon".

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.

Notably, the Complainant contends that:

The disputed domain name features the G4S mark in its entirety in addition to the term "solutions" which proceeds the mark, separated by a hyphen. The G4S mark remains recognizable in the disputed domain name, deeming the addition of this descriptive term inconsequential to a finding of confusing similarity. The Complainant also notes that it operates the division "G4S Secure Solutions", with many of its subsidiaries reflecting this title. Therefore, the use of the term "solutions" in the disputed domain name only reinforces its connection with the Complainant's brand and mark.

The Complainant further contends that the Respondent has no rights or legitimate interests in respect of the domain name. To the best of the Complainant's knowledge, the Respondent does not have any trademark rights to the term "g4s". 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. Paragraph 4(c) of the Policy stipulates some circumstances where the Respondent can demonstrate a right or legitimate interest in a domain name. The Complainant submits that none of the circumstances apply in the present case.

Finally, The Complainant argues that the Respondent registered and used the disputed domain name in bad faith, as defined by the Policy. First, the Complainant's trademark G4S has been registered and used for over 20 years, establishing strong goodwill and recognition in the security services industry. The disputed domain name includes the entire G4S mark combined with "solutions," a term directly related to the Complainant's business. The Complainant maintains that any basic due diligence would have revealed its prior rights, making it inconceivable that the Respondent acted in good faith when registering the disputed domain name.

The disputed domain name currently resolves to no active website, but the Complainant argues that this "passive holding" still constitutes bad faith under established legal precedent. Referencing the Telstra case, the Complainant outlines four indicators of bad faith, all of which are allegedly met here, including the G4S mark's reputation, lack of any good faith use, concealment of identity, and the implausibility of any legitimate use.

Additional evidence of bad faith includes the Respondent's failure to reply to cease and desist notices, and the use of "G4S secure solution" as the Registrant name in Whois records, which implies an attempt to impersonate the Complainant and frustrate legal accountability. Finally, the activation of Mail Exchange ("MX") records associated with the disputed domain name heightens the risk of deceptive email communication, potentially misleading customers. Based on all these factors, the Complainant requests a finding of bad faith registration and use under the Policy. The Complainant submits that the Respondent's name is the same as its employee's name and requests the Respondent's name be redacted from the Decision.

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 or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The disputed domain name features the G4S mark in its entirety in addition to the term "solutions" which follows the mark, separated by a hyphen. The Panel notes that the G4S mark remains recognizable in the disputed domain name, deeming the addition of this descriptive term inconsequential to a finding of confusing similarity (see [WIPO Overview 3.0](#), section 1.8).

With respect to the generic Top-Level Domain ".com" featured in the disputed domain name, the Panel disregards it under the first element as it is a standard registration requirement and cannot prevent a finding of confusing similarity. [WIPO Overview 3.0](#), section 1.11.1.

In view of the above, the Panel finds that the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Accordingly, 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.

As asserted by the Complainant, the Panel 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. Paragraph 4(c) of the Policy stipulates some circumstances where the Respondent can demonstrate a right or legitimate interest in a domain name. According to the Complainant none of the circumstances apply in this case. The Panel notes that:

- The Respondent is not commonly known by the disputed domain name, nor has it made any demonstrable preparations to use the domain in connection with a bona fide offering of goods or services.
- The disputed domain name currently resolves to a parked webpage hosted by Squarespace Domains II LLC, which indicates that it is being passively held. Passive holding of a disputed domain name alone does not constitute a bona fide offering of goods or services under the Policy.
- The Respondent has deliberately registered a domain name that is confusingly similar to the distinctive mark G4S, as the Complainant’s trademark registrations predate the creation date of the disputed domain name by at least 9 years and substantial goodwill has been accrued since the Complainant’s establishment in 1901.

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 name. 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 name such as those enumerated in the Policy or otherwise.

Moreover, the composition of the disputed domain name, incorporating the Complainant’s G4S mark with the term “solutions”, which corresponds in a confusing manner to the corporate entity, Secure Solutions, carries a risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1.

Accordingly, 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.

In the present case, the Panel notes as indicative for the Respondent's bad faith registration and use three circumstances documented by the Complainant, namely:

- The Respondent passively holds the disputed domain name.
- The Respondent never replied to the cease and desist letter sent by the Complainant.
- The Respondent activated a mail exchange (MX) record for the disputed domain name.

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 and reputation of the Complainant's trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy. "The mere registration of a domain name that is identical or confusingly similar [...] to a famous or widely known trademark by an unaffiliated entity can by itself create the presumption of bad faith". [WIPO Overview 3.0](#), section 3.1.4.

Panel decisions have stated that a lack of reply to a cease and desist notice prior to commencing the proceedings may support an inference of bad faith behavior on identifying the registration of the disputed domain name. The Panel notes that a cease and desist notification was sent out to the Respondent on February 7 and 14, 2025, but the Respondent provided no response.

Finally, the presence of MX records has been found by panelists in previous disputes to support a finding of bad faith in certain circumstances. The Panel notes the Respondent's activation of a mail exchange (MX) record for the disputed domain name and agrees with the Complainant that such activation creates a risk that the disputed domain name could be used to send email communications impersonating the Complainant, particularly given the evidently implied affiliation caused by the composition of the disputed domain name, the Respondent's lack of Response to either the Complainant's cease and desist notification or the present UDRP complaint, and the lack of any apparent plausible good faith use to which the disputed domain name may be put.

Accordingly, 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 name <g4s-solutions.com> be transferred to the Complainant.

/Daniel Kraus/

Daniel Kraus

Sole Panelist

Date: May 16, 2025