

ADMINISTRATIVE PANEL DECISION

Amadeus IT Group, S.A. v. Domain Administrator
Case No. D2025-1256

1. The Parties

The Complainant is Amadeus IT Group, S.A., Spain, represented by Ubilibet, Spain.

The Respondent is Domain Administrator, China.

2. The Domain Name and Registrar

The disputed domain name <ckeckmytrip.com> is registered with Above.com, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 27, 2025. On April 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 8, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 13, 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 April 15, 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 April 15, 2025. In accordance with the Rules, paragraph 5, the due date for Response was May 5, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 7, 2025.

The Center appointed Warwick A. Rothnie as the sole panelist in this matter on May 15, 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.

As outlined in Section 4 below, the Complainant commenced business before the disputed domain name was registered but the disputed domain name was registered before the Complainant applied for and registered its trademark. It was not clear from the documents before the Panel when the Complainant began using “CheckMyTrip” or the Respondent became the registrant.

Accordingly, pursuant to its powers under paragraph 12 of the Rules, the Panel issued Administrative Procedural Order No. 1 on June 13, 2025. By this order, the Panel invited the Complainant to provide a supplemental filing addressing these matters and providing the Respondent with the opportunity to submit a response.

In the event, the Complainant submitted a supplemental filing on June 20, 2025. The Respondent did not take up the invitation to provide an answering supplemental filing.

4. Factual Background

The Complainant provides technology solutions and services for the travel industry “ecosystem”. Since its foundation in Spain in 1987, its clients have included Air Canada, Ryanair, Marriott International, Vinci Airports, SNCF, Air Italia, Amsterdam Airport Schiphol, Jetstar, Azul Brazilian Airlines, and HK Express among “many others”.

The Complainant’s business employs some 15,000 people in more than 190 countries around the world. It is also listed on the IBEX 35, a stock index of the top 35 listed companies in Spain.

One of the Complainant’s products is the “CheckMyTrip” travel management application which provides users with a centralized platform to organize and keep track of their travel itineraries including bookings from airlines, hotels and car rental services. The application is available from the website at “www.checkmytrip.com”. There is also a mobile application available through the App Store and the Google Play store. According to the website, the application has more than three million users.

On November 2, 2000, the Complainant registered the domain name <checkmytrip.com>. According to the Complainant’s supplemental filing, that domain name has resolved to a website promoting its service continuously since at least April 28, 2001. Annex B included in the Complainant’s supplemental filing includes a screenshot of a capture by the Wayback Machine dated September 23, 2003. That shows a login page for users of the Complainant’s service which features the banner or logo:



According to the Wayback Machine, there have been some 2,669 captures of the landing page at “www.checkmytrip.com” since April 28, 2001.

The Complaint includes a list of registered trademarks owned by the Complainant including:

- (1) Spanish Registered Trademark No M3644987, which was registered on May 26, 2017 in respect of a range of goods and services in International Classes 9, 39 and 42;

(2) International Registration No 1381987, which was registered on June 27, 2017 in respect of the same or very similar range of goods and services including computer software, travel booking services and design and development of computer hardware and software. The International Registration designated Australia, Colombia, the European Union, India, Japan, Republic of Korea, Mexico, New Zealand, Philippines, Russian Federation, Singapore, Switzerland, Türkiye and the United States of America.

These trademarks (and the others listed in the Complaint) are for the following device:



According to the Whois Report included in Annex 1 to the Complaint, the disputed domain name was registered on October 25, 2004.

The Complaint includes a screenshot showing that the disputed domain name resolved to a page which appears to have pay-per-click (PPC) advertising links.

The Complaint includes evidence of an email apparently sent to one of the Complainant's clients from "[...]@ckeckmytrip.com" which welcomes the recipient "back" and invites them to click on a link button to log into "CHECKMYTRIP".

5. Discussion and Findings

No response has been filed. The Complaint and Written Notice have been sent, however, to the Respondent at the electronic and physical coordinates confirmed as correct by the Registrar in accordance with paragraph 2(a) of the Rules. Bearing in mind the duty of the holder of a domain name to provide and keep up to date correct Whois details, therefore, the Panel finds that the Respondent has been given a fair opportunity to present his or its case.

When a respondent has defaulted, paragraph 14(a) of the Rules requires the Panel to proceed to a decision on the Complaint in the absence of exceptional circumstances. Accordingly, paragraph 15(a) of the Rules requires the Panel to decide the dispute on the basis of the statements and documents that have been submitted and any rules and principles of law deemed applicable.

Paragraph 4(a) of the Policy provides that in order to divest the Respondent of the disputed domain name, the Complainant must demonstrate each of the following:

- (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.

As the Complainant has submitted the supplemental filing in accordance with the Administrative Panel Order, the Panel includes it in record for this proceeding.

A. Identical or Confusingly Similar

The first element that the Complainant must establish is that the disputed domain name is identical with, or confusingly similar to, the Complainant's trademark rights.

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 proven ownership of registered trademarks for the device mark CHECKMYTRIP shown above.

The comparison of the disputed domain name to the Complainant's trademark simply requires a visual and aural comparison of the disputed domain name to the proven trademarks. This test is narrower than and thus different to the question of "likelihood of confusion" under trademark law. Therefore, questions such as the scope of the trademark rights, the geographical location of the respective parties, the date they were acquired and other considerations that may be relevant to an assessment of infringement under trademark law are not relevant at this stage. Such matters, if relevant, may fall for consideration under the other elements of the Policy. See e.g., [WIPO Overview 3.0](#), section 1.7.

In undertaking that comparison, it is permissible in the present circumstances to disregard the generic Top-Level Domain (gTLD) component as a functional aspect of the domain name system. [WIPO Overview 3.0](#), section 1.11.

Ordinarily, it is also usual to disregard the design elements of a trademark under the first element as such elements are generally incapable of representation in a domain name. Where the textual elements have been disclaimed in the registration or cannot fairly be described as an essential or important element of the trademark, however, different considerations may arise. See for example, [WIPO Overview 3.0](#), section 1.10.

In the present case, the analysis is more complicated as the verbal element of the registered trademark is directly descriptive of the service being provided by the Complainant.

That being said, it appears from the very longstanding and extensive use of the Complainant's service initially through the website and later including the mobile applications that the Complainant will have generated significant consumer recognition in the verbal phrase. If that does not rise to the level of secondary meaning as a standalone mark in its own right, the Panel considers at the very least that the expression, despite its descriptive nature, qualifies as a sufficiently important element of, and likely verbal reference for, the trademark, that it is appropriate to apply the usual rule.

Disregarding the ".com" gTLD, therefore, the disputed domain name is a misspelling of the Complainant's trademark CHECKMYTRIP, substituting a "k" for the "h". This appears to the Panel to be an obvious case of "typosquatting" and, accordingly, the Panel finds that the Complainant has established that the disputed domain name is confusingly similar to the Complainant's trademark. [WIPO Overview 3.0](#), section 1.9. Therefore, the requirement under the first limb of the Policy is satisfied.

B. Rights or Legitimate Interests

The second requirement the Complainant must prove is that the Respondent has no rights or legitimate interests in the disputed domain name.

Paragraph 4(c) of the Policy provides that the following circumstances can be situations in which the Respondent has rights or legitimate interests in a disputed domain name:

- (i) before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
- (ii) [the Respondent] (as an individual, business, or other organization) has been commonly known by the [disputed] domain name, even if [the Respondent] has acquired no trademark or service mark rights; or

(iii) [the Respondent] is making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

These are illustrative only and are not an exhaustive listing of the situations in which a respondent can show rights or legitimate interests in a domain name.

While 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 often impossible 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. 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 Respondent registered the disputed domain name after the Complainant began using the trademark.

The Complainant states that it has not authorised the Respondent to use the disputed domain name. Nor is the Respondent affiliated with it.

The disputed domain name is not derived from the Respondent's name. Nor is there any suggestion of some other name by which the Respondent is commonly known from which the disputed domain name could be derived. From the available record, the Respondent does not appear to hold any trademarks for the disputed domain name.

The website to which the disputed domain name resolves does appear to have revenue generating PPC links. To the extent that those links are to flight and tour bookings, the misspelling “ckeckmytrip” as combined is not itself a descriptive term. Moreover, there is evidence that the disputed domain name is being used in connection with a phishing exercise as an email from an address under the disputed domain name conveys a clear misrepresentation that the sender is associated with the Complainant's service. The use of the disputed domain name in connection with such an activity clearly does not confer rights or legitimate interests in respect of the disputed domain name in the face of the Complainant's trademark. [WIPO Overview 3.0](#), section 2.13.

These matters, taken together, are sufficient to establish a prima facie case under the Policy that the Respondent has no rights or legitimate interests in the disputed domain name. The basis on which the Respondent has adopted the disputed domain name, therefore, calls for explanation or justification. The Respondent, however, has not sought to rebut that prima facie case or advance any claimed entitlement. Accordingly, the Panel finds the Complainant has established the second requirement under the Policy also.

C. Registered and Used in Bad Faith

Under the third requirement of the Policy, the Complainant must establish that the disputed domain name has been both registered and used in bad faith by the Respondent. These are conjunctive requirements; both must be satisfied for a successful complaint: See e.g., *Group One Holdings Pte Ltd v. Steven Hafto*, WIPO Case No. [D2017-0183](#).

The Complainant asserts that the Respondent has only recently become the registrant of the disputed domain name. The Complainant does not provide any evidence to support that claim. The fact that the Respondent has not disputed what is merely a bald assertion is not in itself a sufficient basis to accept the Complainant's claim. Accordingly, the Panel proceeds on the basis that the Respondent registered the disputed domain name when it was first registered.

The passage of time since then is not in itself a basis to dismiss the proceeding. [WIPO Overview 3.0](#), section 4.17.

As already noted, the disputed domain name is an obvious misspelling of the key verbal element of the Complainant's trademark. That in itself indicates an intention to capture those mistakenly typing "ckeckmytrip" for "checkmytrip". Further, the disputed domain name appears to be used in connection with attempts to generate revenue through PPC links and phishing.

In these circumstances, the Panel accepts the Complainant's un rebutted allegation that the disputed domain name has been registered and is being used in bad faith under the Policy.

Accordingly, the Complainant has established all three requirements under 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 <ckeckmytrip.com> be transferred to the Complainant.

/Warwick A. Rothnie/

Warwick A. Rothnie

Sole Panelist

Date: July 4, 2025