

ADMINISTRATIVE PANEL DECISION

Ford Motor Company v. Cunshuo Zhang, Jiangli Yihuanlu,
Carolina Rodrigues, Fundacion Comercio Electronico, Domain Admin,
Tropic Management, Shi Lei, Debra Morrison, Niche Tech,
mcd wrapoftheday, Domain Privacy, Domain Name Privacy Inc,
Pramod Buldak
Case No. D2025-1578

1. The Parties

Complainant is Ford Motor Company, United States of America (“United States”), represented by Kucala Burgett Law LLC, United States.

Respondents are Cunshuo Zhang, China (“Respondent No. 1”), jiangli yihuanlu, China (“Respondent No. 2”), Carolina Rodrigues, Fundacion Comercio Electronico, Panama (“Respondent No. 3”), Domain Admin, Tropic Management, Cayman Islands, United Kingdom (“Respondent No. 4”), Shi Lei, China (“Respondent No. 5”), Debra Morrison, Bangladesh (“Respondent No. 6”), niche tech, India (“Respondent No. 7”), mcd wrapoftheday, India (“Respondent No. 8”), Domain Privacy, Domain Name Privacy Inc, Cyprus (“Respondent No. 9”), and Pramod Buldak, India (“Respondent No. 10”).

2. The Domain Names and Registrars

The disputed domain names <fordbenefit.com> (“disputed domain name No. 1”), <fordbenefitguide.com> (“disputed domain name No. 2”), <mtfordbenefit.com> (“disputed domain name No. 3”), <myfordbenefit.info> (“disputed domain name No. 4”), <myfordbenefits.co> (“disputed domain name No. 5”), <myfordbenefits.com> (“disputed domain name No. 6”), <myfordbenefits.help> (“disputed domain name No. 7”), <myfordbenefits.info> (“disputed domain name No. 8”), <my-ford-benefits.live> (“disputed domain name No. 9”), <myfordbenefits.me> (“disputed domain name No. 10”), <myfordbenefits.pro> (“disputed domain name No. 11”), <myfordbenefits.run> (“disputed domain name No. 12”), <myfordbenefits.vip> (“disputed domain name No. 13”), <myfordbenefitz.com> (“disputed domain name No. 14”), and <wwwfordbenefitsguide.com> (“disputed domain name No. 15”) are registered with Sav.com, LLC, GoDaddy.com, LLC, Dynadot Inc, GoDaddy.com, LLC, NameCheap, Inc., Communigal Communications Ltd., One.com A/S, Alpha Beta Domains LLC (the “Registrars”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 17, 2025. On April 22, 2025, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. Between April 22, 2025, to April 25, 2025, the Registrars transmitted by email to the Center their verification disclosing registrants and contact information for the disputed domain names which differed from the named Respondent (Redacted for Privacy / Withheld for Privacy ehf / Super Privacy Service LTD c/o Dynadot / Identity Protection Service / Domains By Proxy, LLC) and contact information in the Complaint.

The Center sent an email communication to Complainant on May 21, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. Complainant filed an amended Complaint on May 27, 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 Respondents of the Complaint, and the proceedings commenced on June 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 26, 2025. Several Respondents sent email communications to the Center on several occasions between May and July 2025.

The Center appointed Stephanie G. Hartung as the sole panelist in this matter on August 8, 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

Complainant is a company organized under the laws of the United States that is active in the automobile industry.

Complainant has provided evidence that it is the registered owner of numerous trademarks relating to its company name and brand FORD, inter alia, but not limited to, the following:

- word trademark FORD, United States Patent and Trademark Office (USPTO), registration number: 643,185, registration date: March 26, 1957, status: active;
- word trademark FORD, USPTO, registration number: 942,993, registration date: September 12, 1972, status: active.

Moreover, Complainant has demonstrated to own various domain names relating to its FORD trademark, inter alia, the domain name <myfordbenefits.com> used in connection with Complainant's official benefits website and portal for company employees and retirees to access and manage their benefit information, including healthcare, retirement, and other programs, and obtain information and assistance from Complainant regarding these benefits.

Respondents, according to the registrar verification, are located either in Bangladesh, Cayman Islands, United Kingdom, China, Cyprus, India, or Panama. The disputed domain names were registered between 2018 and 2025. By the time of the rendering of this decision, the disputed domain names Nos. 6, 7, 11, 13 and 14 resolve and/or redirect to websites which prominently display Complainant's FORD trademark without any authorization to do so, thereby purporting to originate from Complainant and to provide information on Complainant's benefits program; all other disputed domain names, in turn, either resolve/redirect to typical Pay-per-click ("PPC") websites with hyperlinks to third parties' employee benefits programs (i.e. the disputed domain names Nos. 1, 5 and 8) or to default websites (i.e. the disputed domain names Nos. 2, 3, 9, 12 and 15) or access is blocked to them for security reasons (i.e. the disputed domain names Nos. 4 and 10). In this context, Complainant has demonstrated that a similar result existed by the time of the filing of the Complaint, however, that the websites to which the disputed domain names resolve/redirect frequently change their content and display any of the aforementioned settings. Also, Complainant has demonstrated that the majority of the disputed domain names have activated MX records.

Complainant requests that the disputed domain names be transferred to Complainant.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain names. Notably, Complainant contends to be a global leader in the automotive industry, manufacturing and distributing auto mobiles across six continents in approximately 200 markets and that its FORD trademark is among the most well-known and highly regarded trademarks in the world.

Complainant submits that the disputed domain names are confusingly similar to Complainant's famous FORD trademark, as all of them incorporate the latter, merely adding other terms. Moreover, Complainant asserts that Respondents have no rights or legitimate interests in respect of the disputed domain names since (1) Respondents are not known by the disputed domain names, and they have neither been authorized by Complainant to use its FORD trademark in any way, nor have Respondents any connection or affiliation with Complainant; (2) Respondents' use of the disputed domain names includes imposter websites, activating MX records, and distributing malware, all of which are likely illegitimate activities and none of those establishes legitimate rights in the disputed domain names; and (3) impersonating Complainant by using the disputed domain names is not legitimate and cannot establish legitimate rights therein either. Finally, Complainant argues that Respondents have registered and are using the disputed domain names in bad faith since (1) Complainant's FORD trademark is particularly strong and famous, and it is impossible for any of Respondents to claim that they were unaware thereof; (2) Respondents registered numerous disputed domain names that are virtually identical to Complainant's <myfordbenefits.com> domain name used to operate Complainant's official employee benefits website; (3) the imposter websites to which some disputed domain names resolve have been deliberately designed to appear as if they belonged to Complainant or were being operated on Complainant's behalf; and (4) Respondents' creation of MX records for several of the disputed domain names enables email communications that are highly likely to deceive consumers into believing that such communications originate from, or are sponsored by, Complainant.

B. Respondents

Respondents did not formally reply to Complainant's contentions, however, several Respondents sent email communications to the Center on several occasions between May and July 2025, offering e.g. to delete their disputed domain names or to transfer them to Complainant.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, Complainant carries the burden of proving:

- (i) that the disputed domain names are identical or confusingly similar to a trademark or service mark in which Complainant has rights; and
- (ii) that Respondents have no rights or legitimate interests in respect of the disputed domain names; and
- (iii) that the disputed domain names have been registered and are being used in bad faith.

Respondents' failure to submit formal Response(s) in the case at hand does not automatically result in a decision in favor of Complainant. Further, according to paragraph 14(b) of the Rules, the Panel may draw such inferences from Respondents' failure to submit a formal Response as it considers appropriate.

A. Consolidation due to multitude of Respondents and disputed domain names

As regards the multitude of Respondents and disputed domain names belonging to them, the Panel notes that (1) all disputed domain names include and have been set up around the term "fordbenefit" which combines Complainant's famous FORD trademark and the term "benefit", directly pointing at Complainant's official company benefits program, and so have been set up in a similar naming pattern; (2) all disputed domain names share other similarities amongst them, including registrars, IP addresses, MX records, and/or privacy services; (3) all disputed domain names are either used to operate similar websites impersonating Complainant, or to resolve/redirect to PPC or default websites, or access to them is blocked for security reasons, with the particularity that the content connected to the disputed domain names frequently changes and so they display among themselves any of the aforementioned settings; and (4) none of Respondents objected to Complainant's consolidation request or put forward any information how such consolidation would disadvantage them. Therefore, it is reasonable to argue that the disputed domain names are subject to some kind of common control which is why it is also fair and equitable to all Parties that this Complaint is consolidated against multiple Respondents at the same time. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.11.2).

Having said so, the Panel comes to the following finding:

B. Identical or Confusingly Similar

First, 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 Complainant's FORD trademark and the disputed domain names. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, (["WIPO Overview 3.0"](#)), section 1.7.

Complainant has shown rights in respect of its FORD trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. The entirety of such trademark is reproduced within all disputed domain names, merely adding a variety of other terms, such as the terms "benefit" or "benefits". Accordingly, the disputed domain names are confusingly similar to Complainant's FORD trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. Although the addition of other terms (here, e.g. the terms "benefit" or "benefits") may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain names and Complainant's FORD trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Panel, therefore, holds the first element of the Policy has been established.

C. Rights or Legitimate Interests

Second, paragraph 4(c) of the Policy provides a list of circumstances in which Respondents may demonstrate rights or legitimate interests in the disputed domain names.

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 Complainant has established a prima facie case that Respondents lack rights or legitimate interests in the disputed domain names. Respondents have not rebutted Complainant’s prima facie showing and have 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.

Respondents have not been authorized to use Complainant’s FORD trademark, either as a domain name or in any other way. Also, there is no evidence to consider that Respondents’ names would somehow correspond with the disputed domain names and Respondents do not appear to have any trademark rights associated with e.g. the terms “ford” and/or “fordbenefit(s)” on their own.

As far as some of the disputed domain names have been used to operate websites which prominently display Complainant’s FORD trademark without any authorization to do so, thereby purporting to originate from Complainant and to provide information on Complainant’s benefits program, UDRP panels have held that the use of a domain name for illegitimate activity (here, impersonation/passing off as Complainant) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

As far as some of the disputed domain names resolve/redirect to typical PPC websites with hyperlinks to third parties’ employee benefits programs, UDRP panels agree that using a domain name to host a PPC website does not present a bona fide offering where such PPC links compete with or capitalize on the reputation and goodwill of the complainant’s trademark or otherwise mislead Internet users. [WIPO Overview 3.0](#), section 2.9.

Finally, as far as some of the disputed domain names resolve to default websites or access to them is blocked for security reasons, such activities under the disputed domain names do not give rise e.g. to use of, or demonstrable preparations to use, the disputed domain names in connection with a bona fide offering of goods or services either. [WIPO Overview 3.0](#), section 2.2.

The Panel, therefore, finds that Respondents have no rights or legitimate interests in respect of the disputed domain names and that the second element of the Policy has been established, too.

D. Registered and Used in Bad Faith

Third, 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.

The circumstances of this case (e.g. the naming pattern of the disputed domain names) leaves no doubts that Respondents were fully aware of Complainant's rights in the FORD trademark as well as Complainant's business including Complainant's official benefits program when registering the disputed domain names and that the latter clearly are directed thereto.

As far as some of the disputed domain names have been used to operate websites which prominently display Complainant's FORD trademark without any authorization to do so, thereby purporting to originate from Complainant and to provide information on Complainant's benefits program, UDRP panels have held that the use of a domain name for illegitimate activity (here, impersonation/passing off as Complainant) constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

Moreover, resolving some of the disputed domain names to typical PPC websites with hyperlinks to third parties' employee benefits programs, for the obvious purpose of generating PPC revenues, is a clear indication that Respondents intentionally attempted to attract, for commercial gain, Internet users to their own websites by creating a likelihood of confusion with Complainant's FORD trademark as to the source, sponsorship, affiliation or endorsement of those websites. Such circumstances are evidence of registration and use of the concerned disputed domain names in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

As far as some of the disputed domain names resolve to default websites or access to them is blocked for security reasons, such circumstances 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 reputation of Complainant's FORD trademark, and the composition of the disputed domain names, and finds that in the circumstances of this case the passive holding of the disputed domain names does not prevent a finding of bad faith under the Policy.

Finally, the Panel also notes that the majority of the disputed domain names have activated MX records, and further notes that email communication originating from the disputed domain names would be highly likely to deceive consumers into believing that such communication originates from, or is sponsored by Complainant, which obviously is not the case, and so such use would tend to support a finding of bad faith registration and use under the Policy.

The Panel, therefore, holds the third element of the Policy has been established, too.

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, <fordbenefit.com>, <fordbenefitguide.com>, <mtfordbenefit.com>, <myfordbenefit.info>, <myfordbenefits.co>, <myford-benefits.com>, <myfordbenefits.help>, <myfordbenefits.info>, <my-ford-benefits.live>, <myfordbenefits.me>, <myfordbenefits.pro>, <myfordbenefits.run>, <myfordbenefits.vip>, <myfordbenefitz.com>, and <wwwfordbenefitsguide.com>, be transferred to Complainant.

/Stephanie G. Hartung/

Stephanie G. Hartung

Sole Panelist

Date: August 13, 2025