

ADMINISTRATIVE PANEL DECISION

SonarSource SA v. Domain Admin, Privacy Protect LLC PrivacyProtect org
Case No. D2025-1740

1. The Parties

The Complainant is SonarSource SA, Switzerland, represented by Sunstein LLP, United States of America.

The Respondent is Domain Admin, Privacy Protect LLC PrivacyProtect org, United States of America.

2. The Domain Name and Registrar

The disputed domain name <sonar-source.com> is registered with GMO Internet, Inc. d/b/a Discount-Domain.com and Onamae.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 1, 2025. On May 2, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 7, 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 (unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 8, 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 amendment to the Complaint on the same day.

The Center verified that the Complaint together with the amendment to the 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 May 9, 2025. In accordance with the Rules, paragraph 5, the due date for Response was May 29, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 11, 2025.

The Center appointed Meera Chature Sankhari as the sole panelist in this matter on June 13, 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 leading software company based in Geneva, Switzerland. The Complainant is a well-known brand, with over 7 million developers and over 500,000 organizations having used the Complainant's products. Since 2008 the Complainant has used SONAR and SONAR-formative marks in connection with software and software related services. Complainant's considerable investment and promotion in SONAR and SONARSOURCE marks have become synonymous with software products and services of the highest quality.

The Complainant owns trademark registrations in the United States of America, for the marks SONARSOURCE, registration no. 4,177,620, registered on July 24, 2012; SONAR, registration no. 6,132,431, registered on August 25, 2020; and SONARSOURCE, registration no. 7,601,881, registered on December 17, 2024.

The disputed domain name was registered on April 16, 2025. At the time of filing the Complaint, the disputed domain name did not resolve to an active website, but previously (and currently) the disputed domain name redirects to the Complainant's legitimate website. The Respondent has not submitted a response to the Complaint.

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 Respondent has used the entirety of the mark SONARSOURCE by simply separating the words "sonar" and "source" with a hyphen. The Complainant further states that the threshold test for confusing similarity under the UDRP is a comparison between the trademark and the domain name itself to determine likelihood of Internet user confusion.

The Complainant alleges that the trademark SONARSOURCE is highly distinctive in connection with software products and services and is not a word a third party would legitimately choose unless seeking to create an impression of an association with the Complainant.

The Complainant alleges that they have never licensed or otherwise permitted the Respondent to use the mark SONARSOURCE and that such use of the mark is a deliberate attempt to take commercial advantage of Complainant's rights. Complainant argues that the Respondent is not affiliated in any way with Complainant and does not have permission to use the Complainant's registered trademark or any other confusingly similar trademark.

The Complainant further alleges that the Respondent can be inferred to have registered and used the disputed domain name in bad faith because the entire mark "SONARSOURCE" appears within the disputed domain name which currently has no website accessible from the disputed domain name. At the time of lodging the Complaint the disputed domain name did not resolve to an active website, but the Complainant contends it was previously redirecting to the legitimate website of the Complainant. The Complainant alleges that the Respondent also created an email address for targeting third parties.

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 entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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 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.

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 Panel notes that the Respondent's website redirected to the Complainant's legitimate website, and that the Respondent also created an email address using the disputed domain name. From these facts it is evident that the Respondent had constructive notice of Complainant's rights prior to registration and use of the disputed domain name. Needless to mention the Respondent was aware of the

Complainant's mark SONARSOURCE and its reputation, and that it registered the disputed domain name in bad faith, with a clear intent to cause confusion or suggest an association with the Complainant where none exists.

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.

Panels have held that the use of a domain name for redirecting to the Complainant's legitimate website, supports a finding that a respondent has registered a domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the complainant's mark. [WIPO Overview 3.0](#), section 3.1.4. Moreover, noting the distinctiveness and reputation of the Complainant's trademark, as well as the composition of the disputed domain name, the fact that the purported redirection was temporarily deactivated at the time of the filing of the Complaint does not prevent a finding of bad faith under the Policy. [WIPO Overview 3.0](#), section 3.3. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes 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 name <sonar-source.com> be transferred to the Complainant.

/Meera Chature Sankhari/

Meera Chature Sankhari

Sole Panelist

Date: June 27, 2025