

ARBITRATION
AND
MEDIATION CENTER

# ADMINISTRATIVE PANEL DECISION

Saudi Arabian Oil Co. v. Aram Cam Case No. D2025-2045

#### 1. The Parties

The Complainant is Saudi Arabian Oil Co., Saudi Arabia, represented by Fish & Richardson P.C., United States of America.

The Respondent is Aram Cam, Saudi Arabia.

## 2. The Domain Name and Registrar

The disputed domain name in this UDRP proceeding is <aramco.cam>, ("The Disputed Domain Name") and it is registered with Dynadot Inc (the "Registrar").

# 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 23, 2025. On May 23, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On May 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 (Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 26, 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 May 29, 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 June 2, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 22, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 24, 2025.

The Center appointed Munir Suboh as the sole panelist in this matter on July 4, 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, known globally and in Saudi Arabia as ARAMCO, is a Saudi Arabian company established more than 90 years ago by a Royal Decree. The Complainant serves as the country's national oil company and is majority-owned by the state, operating primarily in the petroleum and natural gas sectors.

The Complainant, as of 2024, is categorized by many references as one of the fourth-largest companies in the world by revenue.

The Complainant appears to have acquired ownership on several trademarks, such as the ones listed in Annex (4) to the Complaint. The Complainant demonstrates that the trademark ARAMCO and/or aramco is registered globally and proven to be a well-known brand internationally. These registered trademarks appear to include the European Union trademark number 012676045 for ARAMCO registered on August 15, 2014, The Saudi Arabia trademark number 143306351 for ARAMCO registered on October 2, 2013, and the United Arab Emirates trademark registration number 037628 for ARAMCO registered on January 8, 2002.

The trademark registration certificates as cited in the Complaint are many. Whilst some certificates are issued for the benefit of "SAUDI ARABIAN OIL COMPANY", the Complainant has indicated it has changed its name to "SAUDI ARABIAN OIL CO". Hence, it is adequately proven to the Panel that the trademarks (ARAMCO) as registered and cited in the Complaint and Annex (4) to the Complaint are directly owned by the Complainant. This includes the mark registered in European Union under application number 012676045 since 2014, ARAMCO registered in KSA under application number 143306351, since 2013 and ARAMCO registered in the United Arab Emirates under application number 037628 since 2001.

The Complainant is headquartered in the city of Dhahran in Saudi Arabia, with multiple subsidiaries, affiliates, foreign operations and presence globally located in different countries. The city of Dhahran (in Arabic called: الظهران) is known as the home of ARAMCO. It is the first and largest gated compound city located in the Eastern Province of Saudi Arabia, and it is known for being a major administrative center for the Saudi Oil industry. The Complainant was established in 1930s and Dhahran has been the home of its headquarter for over 90 years.

The Respondent is based in Saudi Arabia.

The Disputed Domain Name was registered on October 22, 2024. The Disputed Domain Name redirects to the Complainant's official website at "www.aramco.com".

### 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.

### **B.** Respondent

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

## 6. Discussion and Findings

Paragraph 4(a) of the Policy lists the three elements that Complainant must satisfy with respect to the Domain Name: (i) the Domain Name is identical or confusingly similar to a trademark or service mark in which Complainant has rights; (ii) Respondent has no rights or legitimate interests in respect of the Domain Name; and (iii) the Domain Name has been registered and is being used in bad faith.

## 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 established that it has rights in the well-known trademark ARAMCO and has hence shown rights in respect of a trademark or service mark for the purposes of the Policy. <u>WIPO Overview 3.0</u>, 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. <u>WIPO Overview 3.0</u>, section 1.7.

The applicable Top-Level Domain ("TLD") in a domain name is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. WIPO Overview 3.0, section 1.11.1. As such, the TLD ".cam" in the Disputed Domain Name is disregarded for the purposes of the first element confusing similarity test.

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 notes that the Disputed Domain Name is automatically directed to the official website of the Complainant at "www.aramco.com". Noting the created confusion, the Disputed Domain Name could be used by the Respondent for illegal activities, including phishing, impersonation/passing off, or other types of fraud. Panels have held that the use of a domain name for illegal activity, here, claimed as impersonation/passing off, or other types of fraud, can never confer rights or legitimate interests on a respondent. WIPO Overview 3.0, section 2.13.1.

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. The Panel notes that in this case:

- Because the ARAMCO trademark has been registered and used by the Complainant before the Disputed Domain Name registration and enjoyed reputation and fame, as recognized in prior UDRP cases, such as: (Saudi Arabian Oil Co. v. Lim Sang Woon, WIPO Case No. D2019-2212; Saudi Arabian Oil Co. v. Identity Protect Limited / Joe Lewis, Flashpoint Marketing, WIPO Case No. D2018-0907, SAUDI ARABIAN O/L CO. v. david hua, LG, WIPO Case No. DCO2025-0029), the Panel finds it more likely than not that Respondent had Complainant's mark in mind when registering the Disputed Domain Name.
- 2) The Respondent is based on the same geographical territory as the Complainant.
- 3) The Respondent is directing Internet users of its Disputed Domain name to the official website of the Complainant, which creates a likelihood of confusion with the Complainant.
- The Respondent has failed to produce evidence of genuine business activity or a bona fide intention to use the mark or the Disputed Domain Name.

The Panel can consider many other circumstances that are relevant in assessing whether the Respondent's registration and use of the Disputed Domain Name is in bad faith but the Panel finds the above explanations are satisfactory.

The Panel notes that the Disputed Domain Name is identical to the Complainant's trademark, and finds that the automatic direction of users to the Complainant's official website creates confusion. The Panel finds that the Respondent has intentionally tried to create the impression that it is the Complainant or that it is connected to the Complainant, when it is not, and disrupts the business of the Complainant by attracting Internet users who may be confused and believe that the website is held, controlled by, or somehow affiliated with or related to the Complainant. The Panel finds that this constitutes bad faith in the circumstances of this case. Furthermore, the Panel notes that even in the absence of direct evidence of phishing or fraud, there is no legitimate reason for such redirection by an unaffiliated party. The Respondent has not made any submissions in this matter, which corroborates the finding of bad faith.

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 <aramco.cam> be transferred to the Complainant.

/Munir Suboh/ Munir Suboh Sole Panelist

Date: July 18, 2025