

## ADMINISTRATIVE PANEL DECISION

Brian M Maouad, Advance 2000, Inc v. Reza Sanjideh, Advanced 2000  
Case No. D2025-2137

### 1. The Parties

Complainant is Brian M Maouad, Advance 2000, Inc, United States of America (“United States”), internally represented.

Respondent is Reza Sanjideh, Advanced 2000, United States, internally represented.

### 2. The Domain Name and Registrar

The disputed domain name <advanced2000.com> (the “Domain Name”) 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 May 30, 2025. On May 30, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On June 2, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (“Gholamreza Sanjidah, Advanced Computer Electronics Inc dba Advanced 2000”) and contact information in the Complaint. The Center sent an email to Complainant on June 3, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on June 4, 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 Respondent 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. The Response was filed with the Center on June 24, 2025.

The Center received unsolicited supplemental filings from Complainant on June 24, and 26, 2025. The Center received an unsolicited supplemental filing from Respondent on June 25, 26, and 27, 2025.

The Center appointed Robert A. Badgley as the sole panelist in this matter on July 1, 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.

In its discretion, the Panel has considered the Parties' respective supplemental filings.

#### **4. Factual Background**

Complainant asserts that it was founded in 1990 as "an Information Technology (IT) products and services company."

Complainant holds a United States Patent and Trademark Office ("USPTO") registration for the word mark ADVANCE 2000, USPTO Reg. No. 3,900,348, registered on January 4, 2011, in connection with, among other things:

"Computer hardware and software consulting services; Computer programming; Computer programming and maintenance of computer programs; Computer programming consultancy; Computer project management services; Computer project management services in the field of telecommunications; Computer security consultancy; [...] Computer services, namely, providing an interactive web site that allows users to collect, store, manage, deliver and showcase electronic and paper-based content; Computer services, namely, remote and on-site management of cloud computing systems and applications for others; Computer services, namely, remote and on-site management of the information technology (IT) cloud computing systems of others; [...] Computer technology support services, namely, help desk services; Consultancy in the field of software design; Consulting in the field of information technology; Consulting in the field of IT project management; Consulting services in the field of cloud computing; Creating or maintaining web sites for others; Creating, designing and maintaining web sites; Creation and maintenance of web sites for others; Creation and provision of web pages to and for third parties; Data warehousing; Database design and development; Design and development of networks; Design and maintenance of web sites for others; Design of home pages, computer software and web sites; [...] IT consulting services; IT integration services; Planning and development of electronic communications networks; Renting computer software; Renting out hardware and software".

This trademark registration indicates a December 14, 1994, date of first use in commerce.

Complainant operates a commercial website at the domain name <advance2000.com>. This website features the following statements:

"Advance2000 is a full-service managed IT provider specializing in Private Cloud Computing; known for transforming complex IT infrastructure into efficient systems, offering high-performance cloud computing and comprehensive IT solutions that help customers enhance their business success. With our innovative four-step process of Strategic IT Audit, Architectural Design, Implementation, and Management, Advance2000 has set forth the initiatives that helps companies thrive while they get work done."

The Domain Name was registered on December 2, 1996. As of June 6, 2025, the Domain Name resolved to a commercial website featuring the header: "Managed Security Services Cyber Security Compliance." Among other things, the home page states:

"Our team of experts can become your outsourced IT department responding to issues quickly, often before you even know about them. Covering everything from your servers and network infrastructure, to your computers, workstations and mobile devices, we provide end-to-end solutions for all of your technology needs." [...]

"When you need managed services to maintain peak operation in the IT network of your small business, consider us here at Advanced 2000. We'll manage all of your IT services for a flat-rate fee so you can focus

your efforts on spurring your revenues to grow. Let us give you the peace of mind you deserve with your small business today with Advanced 2000's managed services.”.

The website invites consumers to click on hyperlinks for more detailed descriptions of Respondent's services, and it provides Respondent's contact information and links to Respondent's social media pages (including Facebook, X, and LinkedIn).

According to Respondent:

“Respondent has operated continuously under the name ‘Advanced 2000’ since 1995 in the Washington DC metropolitan area, offering and providing a range of products and services, including, but not limited to, hardware sales, IT services, and more recently cybersecurity services. Respondent registered the domain advanced2000.com on December 2, 1996, and has maintained active use of the domain in connection with the business ever since [...]. The domain is and has always been used for legitimate commercial purposes, and Respondent's rights in the name “Advanced 2000” predate the Complainant's trademark rights (registered in 2011) by over a decade.”.

Annexed to the Response are various screenshots from the Wayback Machine (“www.archive.org”) showing Respondent's website (located via the Domain Name) at various points in 2002, 2010, and 2015. The Panel notes that the look and feel of these website pages bears no resemblance to the look and feel of Complainant's website.

Also annexed to the Response is a Washington Post article from 1998, in which the writer recommends that the reader consult with “a reputable dealer, such as Advanced 2000 in Alexandria.”

Complainant's counsel issued a cease-and-desist letter to Respondent dated May 21, 2025. Respondent did not reply to this letter, and the Complaint in this proceeding was filed on May 30, 2025.

The record lacks evidence of the extent to which Complainant's ADVANCE 2000 trademark enjoyed renown in December 1996, when the Domain Name was registered.

## **5. Parties' Contentions**

### **A. Complainant**

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name.

In its unsolicited supplemental filing dated June 24, 2025, Complainant cites to three additional and earlier USPTO trademark registrations it allegedly holds for the mark ADVANCE 2000, which registrations are dated October 30, 1990, and two on February 16, 1999. Complainant offered no explanation why these other, and earlier, alleged trademark registrations were not mentioned in its Complaint or Amended Complaint, but the Panel notes that the cited earlier trademark registrations have been cancelled.

In this unsolicited supplemental filing, Complainant also made arguments based on concepts of “constructive notice” and “federal trademark priority.”

Two days later, in an unsolicited “Closing Statement,” Complainant added arguments that Respondent's conduct violated the Lanham Act (the main United States federal statute dealing with trademarks), a second federal statute, provisions of the New York Civil Rights Law, and the federal Copyright Act. In connection with the latter statute, Complainant stated: “If the Respondent's website copies protected elements of our brands, additional violations may apply.” There is no allegation anywhere in the available record that Respondent actually lifted copyrighted content from Complainant.

## **B. Respondent**

Respondent's main defense is that it registered the Domain Name way back in 1996 independently, prior to Complainant's trademark rights, and has used the Domain Name for nearly 30 years in good faith. According to Respondent:

"Furthermore, in the 90's there were no easily searchable online databases, no centralized WHOIS records, and no widespread business directories accessible via the internet. As such, the Respondent had no reasonable way of knowing about the Complainant's local use of a similar name in a completely different state."

Respondent states further:

"Respondent's senior use of the name and long-standing, bona fide business operations predate the Complainant's trademark rights by over a decade. The Panel should deny the Complaint in its entirety and make a finding of Reverse Domain Name Hijacking (RDNH) due to the abusive and opportunistic nature of this proceeding."

In response to Complainant's June 26, 2025, unsolicited "Closing Statement," Respondent states:

"Moreover, the Complainant's second supplemental filing includes a number of inflammatory, unsupported, and legally irrelevant assertions, including references to U.S. criminal statutes, copyright law, and state tort claims, all of which are outside the scope of the UDRP. These arguments are procedurally improper and appear intended to mischaracterize the Respondent's conduct rather than assist the Panel in applying the correct legal standard."

Respondent has asked the Panel to make a finding of Reverse Domain Name Hijacking against Complainant.

## **6. Discussion and Findings**

Paragraph 4(a) of the Policy lists the three elements which 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**

The Panel finds that Complainant holds rights in the trademark ADVANCE 2000 through registration demonstrated in the record. The Panel also finds that the Domain Name is confusingly similar to that mark. Despite the additional letter "d," Complainant's mark remains recognizable within the Domain Name.

### **B. Rights or Legitimate Interests**

Pursuant to paragraph 4(c) of the Policy, Respondent may establish its rights or legitimate interests in the Domain Name, among other circumstances, by showing any of the following elements:

- (i) before any notice to you [Respondent] of the dispute, your use of, or demonstrable preparations to use, the Domain Name or a name corresponding to the Domain Name in connection with a bona fide offering of goods or services; or

- (ii) you [Respondent] (as an individual, business, or other organization) have been commonly known by the Domain Name, even if you have acquired no trademark or service mark rights; or
- (iii) you [Respondent] are making a legitimate noncommercial or fair use of the Domain Name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Panel concludes that Respondent has a legitimate interest in respect of the Domain Name. It is clear from the record that Respondent registered the Domain Name back in 1996 and has used the Domain Name since then to promote its computer-related services. As of 1998, Respondent was regarded, at least by a *Washington Post* writer, as a “reputable dealer.” There is nothing in the record to indicate that Respondent was more likely than not aware of Complainant’s trademark when registering the Domain Name. Even if one takes into account Complainant’s October 30, 1990 registered trademark (now cancelled, and whose existence was not mentioned until Complainant’s unsolicited supplemental filing), Complainant provided no evidence of the extent to which its mark enjoyed renown back in 1996. Accordingly, the Panel finds that, before any notice of this dispute (and there is no record of any dispute prior to the May 21, 2025, cease-and-desist letter), Respondent had been offering in good faith goods and services for more than 28 years. This vests Respondent with a legitimate interest vis-à-vis the Domain Name under the above-quoted Policy paragraph 4(c)(i).

Complainant has not established Policy paragraph 4(a)(ii). The Complaint fails.

### **C. Registered and Used in Bad Faith**

Paragraph 4(b) of the Policy provides that the following circumstances, “in particular but without limitation,” are evidence of the registration and use of the Domain Name in “bad faith”:

- (i) circumstances indicating that Respondent has registered or has acquired the Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Domain Name registration to Complainant who is the owner of the trademark or service mark or to a competitor of that Complainant, for valuable consideration in excess of its documented out of pocket costs directly related to the Domain Name; or
- (ii) that Respondent has registered the Domain Name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that Respondent has engaged in a pattern of such conduct; or
- (iii) that Respondent has registered the Domain Name primarily for the purpose of disrupting the business of a competitor; or
- (iv) that by using the Domain Name, Respondent has intentionally attempted to attract, for commercial gain, Internet users to Respondent’s website or other online location, by creating a likelihood of confusion with Complainant’s mark as to the source, sponsorship, affiliation, or endorsement of Respondent’s website or location or of a product or service on Respondent’s website or location.

The Panel concludes, for the reasons discussed above, that Respondent did not register the Domain Name in bad faith.

### **D. Reverse Domain Name Hijacking**

The Panel finds that Complainant has committed Reverse Domain Name Hijacking (“RDNH”).

In general, a UDRP panel is more likely to make an RDNH finding where a complainant is represented by counsel, but such representation is not required for an RDNH finding when circumstances warrant.

In the instant case, Complainant should have known that it needed to do more to make out its case when it learned that Respondent had owned the Domain Name for more than 28 years.

In addition, after receiving the Response in which Respondent laid out evidence of its use of the Domain Name for many years, Complainant inexplicably submitted an unsolicited supplemental filing to the Center.

With no attempt at an explanation, Complainant added to its list of trademark registrations (which stood at one in the Complaint and Amended Complaint) three more alleged (now cancelled) trademarks, all of which predate the one Complainant put into the record initially. This potentially crucial information should have been included in the initial Complaint.

Moreover, two days later, Complainant submitted a "Closing Statement" in which it threw open the arguments well beyond the remit of the UDRP. As noted above, in the face of a Response articulating a good-faith use of the disputed domain name for 28 years, rather than withdrawing the Complaint or seeking to settle the case, Complainant has now dragged federal trademark statutes, the federal copyright statute (along with a conditional yet unproven factual scenario under which this statute might come into play in some forum), and a New York civil rights statute.

At this point, in the Panel's view, Complainant has made a farce of this proceeding. It is granted that the UDRP is not universally known and understood in the legal and business world, but if one decides to launch a UDRP complaint, one should take a modicum of trouble to understand its basic tenets and its elements and limitations, or else hire someone familiar with the UDRP to get it done.

## **7. Decision**

For the foregoing reasons, the Complaint is denied. The Panel finds that Complainant has committed Reverse Domain Name Hijacking.

*/Robert A. Badgley/*

**Robert A. Badgley**

Sole Panelist

Date: July 15, 2025