

ADMINISTRATIVE PANEL DECISION

Guillaume Pousaz, Pousaz Philanthropies Foundation v. Luis Domeij
Case No. D2025-2341

1. The Parties

The Complainants are Guillaume Pousaz (the “First Complainant”), United Kingdom (“UK”), and Pousaz Philanthropies Foundation (the “Second Complainant”), Jersey, UK, represented by Venner Shipley LLP, UK.

The Respondent is Luis Domeij, Norway.

2. The Domain Names and Registrar

The disputed domain names <guillaume-pousazfdt.com> and <guillaume-pousazfdt.com> (the “Disputed Domain Names”) are registered with Cosmotown, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 13, 2025. On June 16, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On June 19, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Disputed Domain Names which differed from the named Respondent (Cosmotown, Inc) and contact information in the Complaint. The Center sent an email communication to the Complainants on June 24, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainants to submit an amendment to the Complaint. The Complainants filed an amended Complaint on July 3, 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 July 3, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 23, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 24, 2025.

The Center appointed Flip Jan Claude Petillion as the sole panelist in this matter on August 7, 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 First Complainant is the founder and CEO of the global payment services provider “CHECKOUT.COM”. “CHECKOUT.COM” was founded in 2008 as Opus Payments and was valued at USD 40 billion in 2022.

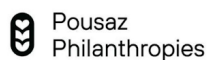
The First Complainant and his wife established the Second Complainant in 2022, which is a charitable foundation. The Second Complainant focuses on supporting the safety and education of children worldwide.

The Second Complainant holds the following trademarks:

- UK figurative mark depicted below, registered under No. UK00003894460 on June 30, 2023, in classes 35, 36, and 41:



- United States of America figurative mark depicted below, registered on under No. 7763016 April 15, 2025, in classes 35, 36, and 41:



Both Disputed Domain Names were registered on May 13, 2025. According to the Complainants' evidence, both Disputed Domain Names resolved to identical websites of a philanthropic foundation referred to as “Guillaume Pousaz Group”, purporting to be associated with the First Complainant. The Disputed Domain Name <guillaumepousazfdt.com> currently does not resolve to an active website. After receiving a deceptive website warning, the Disputed Domain Name <guillaume-pousazfdt.com> resolves to a website offering vehicle care services.

5. Parties' Contentions

A. Complainants

The Complainants contend that they have satisfied each of the elements required under the Policy for a transfer of the Disputed Domain Names.

First, the Complainants contend that the Disputed Domain Names are confusingly similar to registered and unregistered marks in which they claim to have rights.

Second, the Complainants claim that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Names as, in summary, according to the Complainants:

- the websites linked to both Disputed Domain Names include the name, pictures and a biography of the First Complainant, thereby implying that the First Complainant is the individual behind the fraudulent philanthropic foundation which the Disputed Domain Names purport to represent;

- neither the First Complainant nor the Second Complainant have any association with the Disputed Domain Names. Neither references to the First Complainant nor the use of the name “Guillame Pousaz” on the websites linked to Disputed Domain Names are authorised by either of the Complainants;
- the websites linked to Disputed Domain Names are clearly being used to attempt to impersonate the First Complainant. The use of a domain name for impersonation cannot confer rights of legitimate interests to a respondent.

Finally, the Complainants claim that the Disputed Domain Names were registered and are being used in bad faith. In summary, according to the Complainants:

- given the Complainants’ significant reputation in the Complainants’ registered and unregistered marks, and noting that the websites linked to Disputed Domain Names are being used to impersonate the First Complainant, it is inconceivable that the Respondent was unaware of the Complainants when registering the Disputed Domain Names;
- it is also inconceivable that the Respondent could have any good faith reason to use the Disputed Domain Names, which consists of the Complainants’ registered or unregistered marks;
- the Disputed Domain Names are clearly intended to intentionally attract Internet users and to deceive internet users into believing that the websites linked to Disputed Domain Names are operated by or otherwise associated with the Complainants, which is contrary to paragraph 4(b)(c) of the Policy;
- the use of the Disputed Domain Names can be disruptive to the business of the Complainants and harmful to the reputation of the Complainants;
- the Respondent is engaged in a pattern of bad faith behaviour, as other similar domain names resolving to websites identical to the websites linked to Disputed Domain Names are, or have been, subject to separate UDRP proceedings.

B. Respondent

The Respondent did not reply to the Complainants’ contentions.

6. Discussion and Findings

6.1. Preliminary Procedural Issue: Multiple Complainants

In the present case, the Complaint was filed by two separate Complainants. While the Policy and Rules do not directly contemplate the consolidation of multiple complainants in a single administrative Complaint, numerous panels have found that in certain circumstances such a consolidation may be permitted.

In assessing whether a complaint filed by multiple complainants may be brought against a single respondent, panels look at whether (i) the complainants have a specific common grievance against the respondent, or the respondent has engaged in common conduct that has affected the complainants in a similar fashion, and (ii) it would be equitable and procedurally efficient to permit the consolidation (see section 4.11.1 of WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”).

In the case at hand, the link between both the Complainants is clear from the undisputed evidence provided. The First Complainant is one of the founders of the Second Complainant, and both the name of the First Complainant and part of the Second Complainant’s trademarks are included in the Disputed Domain Names.

The Panel therefore finds that it is sufficiently established that the Complainants have a specific common grievance against the Respondent and that it would be equitable and procedurally efficient to consolidate the Complainants.

6.2. Substantive Elements of the Policy

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 Complainants' marks and the Disputed Domain Names. While each case is judged on its own merits, in cases where at least a dominant feature of the relevant mark is recognizable in a disputed domain name, the domain name will normally be considered confusingly similar to that mark for purposes of UDRP standing. [WIPO Overview 3.0](#), section 1.7.

Based on the available record, the Panel finds the Second Complainant has shown rights in respect of trademarks or service marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

Both Disputed Domain Names contain the dominant feature of the Second Complainant's POUZAZ PHILANTHROPIES marks, namely the element "pouzaz". Therefore, the Panel finds that the Second Complainant's mark remains recognizable in the Disputed Domain Names. [WIPO Overview 3.0](#), section 1.7.

Both Disputed Domain Names combine the "pouzaz" element with the first name of the First Complainant ("guillaume") and the term "fdt". Although the addition of other terms 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 the marks under the first element of the Policy. [WIPO Overview 3.0](#), section 1.8.

Additionally, it is well established that generic Top-Level Domains ("gTLDs"), here ".com", may be disregarded when considering whether a disputed domain name is confusingly similar to a trademark in which a complainant has rights.

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 Complainants have established a prima facie case that the Respondent lacks rights or legitimate interests in the Disputed Domain Names. The Respondent has not rebutted the Complainants' prima facie showing and has 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.

The Panel notes that the Respondent has not apparently been commonly known by the Disputed Domain Names, and that the Respondent does not seem to have acquired trademark or service mark rights. According to the information provided by the Registrar, the Respondent is named "Luis Domeij".

In the present case, the Disputed Domain Names incorporate the dominant feature of the Second Complainant's POUZAZ PHILANTHROPIES marks and combine the "pousaz" element with the first name of the First Complainant ("guillaume") and the letters "fdt". The only difference between both Disputed Domain Names is the addition of a hyphen in the Disputed Domain Name <guillaume-pousazfdt.com>.

In the Panel's view, the combination of the "pousaz" element with the first name of the First Complainant can even increase the confusion with the Second Complainant's marks. Indeed, the Complainants' evidence shows that the First Complainant's philanthropic initiatives and the link between both Complainants has been covered in the press.

Beyond looking at the domain name and the nature of any additional terms appended to it, UDRP panels assess whether the overall facts and circumstances of the case, such as the content of the website linked to a disputed domain name and the absence of a response, support a fair use or not. [WIPO Overview 3.0](#), sections 2.5.2 and 2.5.3.

The Panel observes that, according to the Complainants' evidence, both Disputed Domain Names resolved to identical websites of an alleged philanthropic foundation referred to as "Guillaume Pousaz Group", which appears to offer services similar to the Second Complainant's services. These websites included the name, pictures and a biography of the First Complainant, thereby implying that the First Complainant is the individual behind this philanthropic foundation. In the Panel's view, this neither amounts to a bona fide offering of goods or services nor a legitimate noncommercial or fair use of the Disputed Domain Names in the circumstances of this case. Panels have categorically held that the use of a domain name for illegal activity (e.g. 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.

The Respondent had the opportunity to demonstrate its rights or legitimate interests but did not do so. In the absence of a Response from the Respondent, the prima facie case established by the Complainants has not been rebutted.

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. Among these factors demonstrating bad faith registration and use is the use of a domain name to intentionally attempt to attract, for commercial gain, Internet users to a website or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website or location or of a product or service on the website or location.

In the present case, the Panel finds that the Respondent must have been aware of the Complainants and the Second Complainant's trademark rights when it registered the Disputed Domain Names:

- the Complainants show that the First Complainant has a reputation in the financial technology sphere and its foundation of the Second Complainant has been covered in the press;
- both Disputed Domain Names incorporate the dominant feature of the Second Complainant's marks (which also corresponds to the First Complainant's last name) and combine it with the first name of the First Complainant;

- the websites linked to the Disputed Domain Names included the name, pictures and a biography of the First Complainant.

By offering services similar to the Second Complainant's services and using the name, pictures and a biography of the First Complainant, the Panel finds that the Disputed Domain Names have been used to intentionally attempt to attract, for commercial gain, Internet users to a website or other online location, by creating a likelihood of confusion with the Complainants as to the source, sponsorship, affiliation, or endorsement of the website or location or of a product or service on the website or location.

Moreover, Complainants claim that the Respondent is engaged in a pattern of bad faith behaviour, as other similar domain names resolving to websites identical to the websites linked to Disputed Domain Names are, or have been, subject to separate UDRP proceedings. See *Guillaume Pousaz, Pousaz Philanthropies v. MELENDEZ PEDRO J, unknown*, WIPO Case No. [D2025-1720](#), <guillaume-pousazfdn.com>; and *Guillaume Pousaz, Pousaz Philanthropies v. Mavis Scoopbce*, WIPO Case No. [D2024-3523](#), <guillaume-pousaz.com>. The Panel observes that the respondents' names in the UDRP cases referred to do not correspond to the name of the Respondent in the present case. Noting that the Respondent's registration and use of the Disputed Domain Name are clearly in bad faith, it is not necessary for the Panel to consider the Complainants' allegation of the Respondent's pattern of bad faith.

Given the totality of the circumstances discussed above, the fact that the Disputed Domain Name <guillaume-pousazfdt.com> currently resolves to an inactive webpage would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Also, the fact that after receiving a deceptive website warning, the Disputed Domain Name <guillaume-pousazfdt.com> currently resolves to an unrelated third-party website does not change the Panel's findings above.

By failing to respond to the Complaint, the Respondent did not take any initiative to contest the foregoing. Pursuant to paragraph 14(b) of the Rules, the Panel may draw the conclusions it considers appropriate.

Based on the available record, the Panel finds that the Complainants have 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 Names <guillaume-pousazfdt.com> and <guillaume-pousazfdt.com> be transferred to the Complainants.

/Flip Jan Claude Petillion/

Flip Jan Claude Petillion

Sole Panelist

Date: August 21, 2025