

ADMINISTRATIVE PANEL DECISION

**Constellation Energy Corporation v. Sue Soliman Greens Distribution, and
James Ron, Constellation Power
Case No. D2025-2671**

1. The Parties

The Complainant is Constellation Energy Corporation, United States of America “(United States)”, represented by Riley Safer Holmes and Cancila LLP, United States.

The Respondents are Sue Soliman Greens Distribution, United States, and James Ron, Constellation Power, United States.

2. The Domain Names and Registrar

The disputed domain names <job-constellation.com> and <job-constellationenergy.com> are registered with Tucows Domains Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 7, 2025. On July 8, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 8, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 9, 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 July 14, 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 Respondents of the Complaint, and the proceedings commenced on July 16, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 5, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on August 6, 2025.

The Center appointed Joseph Simone as the sole panelist in this matter on August 15, 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, CONSTELLATION ENERGY CORPORATION, was the first privately-financed commercial nuclear power plant in the United States when it started business in 1960. Since then, the Complainant has become one of the nation's largest producers of reliable, clean, carbon-free energy, and a leading retail supplier of power and energy products and services for homes and businesses across the United States. The company provides power to more than 16 million homes and businesses.

The Complainant has an extensive global portfolio of trade mark registrations incorporating the "CONSTELLATION" and "CONSTELLATION ENERGY" marks, including the following:

- United States of America Trade Mark Registration No. 2161537 for CONSTELLATION ENERGY in Class 40, registered on June 2, 1998;
- United States of America Trade Mark Registration No. 4339956 for CONSTELLATION in Classes 35, 40 and 42, registered on May 21, 2013;
- United States of America Trade Mark Registration No. 4343586 for CONSTELLATION in Classes 35, 36, 40 and 42, registered on May 28, 2013; and
- United States of America Trade Mark Registration No. 4472604 for CONSTELLATION in Class 39, registered on January 21, 2014.

The disputed domain name <job-constellation.com> was registered on June 22, 2025, and the other disputed domain name, <job-constellationenergy.com>, was registered on June 17, 2025. The evidence provided by the Complainant indicates that at the time of filing of the Complaint, the disputed domain names had been used to impersonate the Complainant in fraudulent emails that were sent to multiple third parties.

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 names.

Notably, the Complainant contends that the disputed domain names registered by the Respondents are identical or confusingly similar to the Complainant's CONSTELLATION and CONSTELLATION ENERGY marks and that the addition of the generic Top-Level Domain ("gTLD") ".com" does not affect the analysis as to whether the disputed domain names are identical or confusingly similar to the Complainant's trade marks.

Furthermore, the Complainant argues that the addition of the term "job" does not prevent a finding of confusing similarity between the disputed domain names and the Complainant's CONSTELLATION and CONSTELLATION ENERGY marks.

The Complainant asserts that it has not authorized the Respondents to use the CONSTELLATION and CONSTELLATION ENERGY marks, and there is no evidence to suggest that the Respondents have used, or have undertaken any demonstrable preparations to use, the disputed domain names in connection with a bona fide offering of goods or services.

The Complainant also claims that there is no evidence that the Respondents have any connection to the CONSTELLATION and CONSTELLATION ENERGY marks, and that there is no plausible good faith reason for the Respondents to have registered the disputed domain names and used them as email addresses in respect of multiple emails impersonating the Complainant. The Complainant therefore argues that the registration and any use of the disputed domain names must be in bad faith.

B. Respondents

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

6. Discussion and Findings

6.1 Preliminary Issue: Consolidation of Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the disputed domain name registrants are the same entity, or mere alter egos of one other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The Respondents have not presented any arguments asserting that consolidation would be unfair or inequitable.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

Paragraph 10(e) of the Rules states that a "[p]anel shall decide a request by a Party to consolidate multiple domain name disputes in accordance with the Policy and these Rules". Paragraph 10(c) of the Rules provides, in relevant part, that "the [p]anel shall ensure that the administrative proceeding takes place with due expedition". Section 4.11.2 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)") summarizes the consensus view of UDRP panels on the consolidation of multiple respondents and provides that where a complaint is filed against multiple respondents, panels consider whether the domain names or corresponding websites are subject to common control, and whether the consolidation would be fair and equitable to all parties

The record provides clear indications that the disputed domain names are under common control. To wit: (1) both disputed domain names target the Complainant and its trademarks and are being used in the same kind of phishing activities, (2) the phishing emails use similar impersonation techniques and false identities to appear as if they originate from the Complainant's Operational Manager and most tellingly (3) the two Respondents share the same phone number.

Accordingly, the Panel has decided to consolidate the disputes involving the two disputed domain names in a single proceeding.

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 3.0](#), section 1.7.

The Panel acknowledges that the Complainant has established rights in the CONSTELLATION and CONSTELLATION ENERGY trademarks by providing evidence of its trademark registrations. [WIPO Overview 3.0](#), section 1.2.1.

The disputed domain name <job-constellation.com> incorporates the CONSTELLATION mark in its entirety and <job-constellationenergy.com> incorporates the CONSTELLATION ENERGY mark in its entirety. The Respondents have added to the Complainant's service marks the word "job" and a hyphen. The Panel finds the Complainant's CONSTELLATION and CONSTELLATION ENERGY marks still are recognizable in the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the Complainant's CONSTELLATION and CONSTELLATION ENERGY marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel thus finds that the Complainant has satisfied its burden of proof under Policy paragraph 4(a)(i).

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which a 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.

In this case, the Complainant asserts that it has not authorized the Respondents to use its trademarks and there is no evidence to suggest that the Respondents have used, or undertaken any demonstrable preparations to use, the disputed domain names in connection with a bona fide offering of goods or services. Having reviewed the available record, the Panel finds that the Complainant has established a prima facie case that the Respondents lack rights or legitimate interests in the disputed domain names.

The composition of the disputed domain names, which incorporates the Complainant's distinctive trade marks (also corresponding to the Complainant's company name) with the word "job" and a hyphen, and the Respondents's use of the disputed domain names to impersonate the Complainant for arranging job interviews, lead the Panel to conclude that this is not a bona fide offering of goods or services as permitted under paragraph 4(c)(i) of the Policy. [WIPO Overview 3.0](#), section 2.13.1. The Panel will discuss this issue further in the Bad Faith below.

The Respondents did not file a substantive response and have therefore failed to assert factors or put forth evidence to establish that they enjoy rights or legitimate interests in the disputed domain names. Meanwhile, no evidence has been provided to demonstrate that the Respondents, prior to the notice of the dispute, had used or demonstrated their preparations to use the disputed domain names in connection with a bona fide offering of goods or services.

There is also no evidence to show that the Respondents have been commonly known by the disputed domain names or that they are making a legitimate noncommercial or fair use of the disputed domain names.

As such, the Panel concludes that the Respondents have failed to rebut the Complainant's prima facie showing of the Respondents' lack of rights or legitimate interests in the disputed domain names, and that none of the circumstances of paragraph 4(c) of the Policy is applicable in this case.

Accordingly, and based on the Panel's findings below, the Panel finds that the Respondents have no rights or legitimate interests in the disputed domain names pursuant to paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

The third and final element that a complainant must prove is that the respondent has registered and is using the disputed domain name in bad faith.

Paragraph 4(b) of the Policy states that any of the following circumstances, in particular but without limitation, shall be considered as evidence of the registration and use of a domain name in bad faith:

- (i) circumstances indicating that the respondent registered or acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant (the owner of the trademark or service mark) or to a competitor of that complainant, for valuable consideration in excess of the respondent's documented out-of-pocket costs directly related to the domain name; or
- (ii) circumstances indicating that the respondent 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 the respondent has engaged in a pattern of such conduct; or
- (iii) circumstances indicating that the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or
- (iv) circumstances indicating that the respondent is using the domain name to intentionally attempt to attract, for commercial gain, Internet users to its 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 respondent's website or location or of a product or service on its website or location.

The examples of bad faith registration and use as set forth in paragraph 4(b) of the Policy are not meant to be exhaustive of all circumstances in which bad faith may be found. Other circumstances may also 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).

For reasons discussed under this and the preceding heading, the Panel believes that the Respondents' conduct in this case constitutes bad faith registration and use of the disputed domain names.

When the Respondents registered the disputed domain names, the CONSTELLATION and CONSTELLATION ENERGY trademarks were already widely known and directly associated with the Complainant's activities. UDRP panels have consistently found that the mere registration of a domain name that is confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. See [WIPO Overview 3.0](#), section 3.1.4.

Given the extensive prior use and fame of the Complainant's marks, in the Panel's view, the Respondents should have been aware of the Complainant's marks when registering the disputed domain names.

The Complainant's registered trademark rights in CONSTELLATION and CONSTELLATION ENERGY for its products and services predate the registration date of the disputed domain names. A simple online search for the terms "constellation" and "constellation energy" would have revealed that it is an established brand. [WIPO Overview 3.0](#), section 3.2.2.

The Panel is therefore of the view that the Respondents registered the disputed domain names with knowledge of the Complainant's trademark rights.

Moreover, the Complainant has provided evidence that the Respondents have used the disputed domain names to send out fraudulent emails, impersonating an employee of the Complainant setting up job interviews. UDRP panels have consistently held that the use of a domain name for impersonation constitutes use in bad faith ([WIPO Overview 3.0](#), section 3.4). Upon review of the record, the Panel finds that both the registration and use of the disputed domain names by the Respondents constitute bad faith under the Policy. The Panel is of the opinion that the recipients of such emails will be confused by the use of the Complainant's trademarks in these emails. On this basis, the Panel finds the Respondents' registration and use of the disputed domain names constitutes bad faith under the Policy.

All in all, the Panel finds it likely that the Respondents registered the disputed domain names with full knowledge that these domain names incorporated a recognized trademark in which the Respondents had absolutely no prior rights. The Respondents have not offered any explanations to why they registered the disputed domain names. They have also failed to explain why the registrant information of <job-constellation.com> used the name of the Complainant (i.e., with "Constellation Power" listed as the Organization Name).

The record of this case does not provide a plausible reason for the Respondents to have registered the disputed domain names without any association with or authorization from the Complainant. The Panel cannot conceive any good faith use by the Respondents.

Accordingly, the Panel finds that the disputed domain names were registered and used in bad faith pursuant to paragraph 4(a)(iii) 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 <job-constellation.com> and <job-constellationenergy.com> be transferred to the Complainant.

/Joseph Simone/

Joseph Simone

Sole Panelist

Date: August 28, 2025