

ADMINISTRATIVE PANEL DECISION

PN II, Inc. v. Paul Pulte
Case No. D2025-2811

1. The Parties

The Complainant is PN II, Inc., United States of America, represented by Adams and Reese LLP, United States of America.

The Respondent is Paul Pulte, France.

2. The Domain Name and Registrar

The disputed domain name <pultegrouppcorp.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 16, 2025. On July 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 17, 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 (Registrant of <PulteGroupCorp.com>) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 18, 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 21, 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 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 12, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 14, 2025.

The Center appointed Mireille Buydens as the sole panelist in this matter on August 18, 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 wholly-owned subsidiary of PulteGroup, Inc. The Complainant and its predecessors have been using the PULTE mark since 1969, and the PULTEGROUP mark since 2010. PulteGroup, Inc. and its subsidiaries offer home building, real estate, mortgage lending, and related services under the PULTE Marks, and advertise these services through various websites as well as through print media and other advertising and promotional campaigns. PulteGroup, Inc. is the largest homebuilding company in the United States of America and currently operates in approximately fifty markets.

The Complainant has a large portfolio of registrations for the PULTE and PULTEGROUP trademark, including (inter alia) the following (hereafter “the PULTE and PULTEGROUP Trademark” or “the Trademark”):

- United States of America Trademark Registration No. 3676026 (PULTE, word mark), registered on September 1, 2009;
- United States of America Trademark Registration No. 1942747 (PULTE, word mark), registered December 19, 1995;
- and United States of America Trademark Registration No. 4077463 (PULTEGROUP), registered December 27, 2011.

The Complainant owns various domain names where it operates its principal websites, including <pulte.com>, <pultegroup.com> and <pultegroupinc.com>.

The disputed domain name was registered on June 26, 2025. According to the Complaint, the disputed domain name is directing to a parking page showing pay-per-click advertising links to websites purportedly offering services identical or related to those of the Complainant. The disputed domain name was also used to send a fraudulent email to a third-party vendor, in which the sender requested a quote for products.

At the time of this Decision, the disputed domain name resolves to an error page.

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.

First, the Complainant asserts that the disputed domain name is confusingly similar to the PULTE and PULTEGROUP Trademark as the disputed domain name reproduces the PULTE and the PULTEGROUP Trademarks in their entirety. The addition of the suffix “corp” an abbreviation of the generic word “corporation”, does not prevent the disputed domain name from being confusingly similar to the PULTE and PULTEGROUP Trademarks. In fact, because the Complainant is doing business as a corporation, the addition of the term “corp” actually serves to increase the confusing similarity with the Complainant's PULTE and PULTE GROUP Trademarks.

Second, the Complainant asserts that the Respondent lacks rights or legitimate interests in the disputed domain name. The disputed domain name is not the Respondent's name, and to the Complainant's knowledge, the Respondent is not, and has never been commonly known as “Pultegroupcorp”. Although the Respondent has used “Pulte” as their last name in the disputed domain name registration, the Complainant submits that this is a fake name intended to falsely create the appearance of a legitimate interest in the

disputed domain name. The Complainant also explains that the address mentioned in the register is fictitious. The Complainant further asserts that the Respondent is not, and has never been authorized by the Complainant to register or use the Complainant's Trademarks or to apply for or use any domain name incorporating the Trademarks. The Complainant further submits that the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services, or in a legitimate noncommercial or fair manner. On the contrary, the Respondent is using the disputed domain name to impersonate a Complainant's employee and send at least one fraudulent inquiry to an unsuspecting third-party vendor, presumably in furtherance of a phishing scam or fraud. Besides, the disputed domain name redirected to a parking page showing pay-per-click advertising links to websites purportedly offering services identical or related to those of the Complainant.

Third, the Complainant asserts that the disputed domain name was registered and is being used in bad faith.

Given the trademark registrations for the PULTE and PULTEGROUP Trademarks, the Complainant's numerous domain names incorporating the Trademarks, the Complainant's reputation, and the fact that the Trademarks are highly distinctive, it is not plausible that the Respondent could have been unaware of the Complainant and its Trademarks at the time of registration. The Respondent's knowledge of the Complainant is evidenced by the Respondent's use of the disputed domain name to impersonate one of Complainant's employees and send a fraudulent online inquiry to at least one other entity, and the fact that the Respondent was using the disputed domain name to redirect to a parking page showing pay-per-click advertising links to websites offering services identical or related to those of the Complainant. By using the disputed domain name in this manner, the Respondent generates unjustified revenues for each click-through of the sponsored links, thereby illegitimately capitalizing on the Complainant's Trademarks and reputation.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy provides that the Complainant proves each of the following three elements to succeed in its Complaint:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed 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 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 disputed domain name consists of the Complainant's PULTEGROUP Trademark, with the addition of the suffix "corp" (which is an abbreviation for "corporation"). Despite this addition, the PULTEGROUP Trademark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the Trademark for the purposes of the Policy. [WIPO Overview 3.0](#), sections 1.7 and 1.8.

Although the addition of other elements, here the abbreviation “corp”, may bear on assessment of the second and third elements, the Panel finds the addition of such elements does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Top Level Domain “.com”, may be disregarded for the purposes of assessment under the first element, as it is viewed as a standard registration requirement.

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 Respondent did not claim to be commonly known by the disputed domain name, nor to have acquired or applied for a trademark registration for “pultegroupcorp”, or any variation thereof. The Complainant has asserted, without being contradicted by the Respondent, that the Respondent is not a licensee of the Complainant, nor affiliated with the Complainant in any way, nor authorized in any way to register and use the disputed domain name.

The Panel notes that the disputed domain name reproduces the PULTE GROUP Trademark in its entirety with the mere addition of the suffix “corp”, which is an abbreviation of “corporation” and increases the confusing similarity between the disputed domain name and the Complainant as the Complainant is doing business as a corporation. As a result, the disputed domain name carries a risk of implied affiliation, which cannot constitute fair use as it suggests sponsorship or endorsement by the Complainant. The composition of the disputed domain name affirms the Respondent’s intention of taking unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant’s PULTE GROUP Trademark and corporate name and to mislead the Internet users for commercial gain as it resolved to a parking page showing pay-per-click links to websites purportedly offering services similar to those of the Complainant. Applying paragraph 4(c) of the Policy, panels have found that the use of a domain name to host a parked page comprising pay-per-click links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant’s mark or otherwise mislead Internet users. [WIPO Overview 3.0](#), section 2.9.

The Panel also notes that the disputed domain name was used to impersonate an employee of the Complainant by sending a fraudulent email to a third party, requesting a quote for products, presumably in furtherance of a phishing attempt. Panels have held that the use of a domain name for illegitimate activity, here, claimed phishing, 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.

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 notes that the Respondent has composed the disputed domain name by combining the Complainant's PULTE GROUP Trademark with the letters "corp", which are an abbreviation of "corporation". This increases the confusing similarity between the disputed domain name and the Complainant as the Complainant is doing business as a corporation and operates its official website at <pultegroupinc.com>. Given the trademark registrations for the PULTE and PULTEGROUP Trademarks (which predate the registration date of the disputed domain name), the Complainant's numerous domain names incorporating the PULTE and PULTEGROUP Trademarks and the Complainant's domain name <pultegroupinc.com> directing to (one of) its official websites, and the fact that the PULTE and PULTEGROUP Trademarks are highly distinctive trademarks, it is not plausible that the Respondent was unaware of the Complainant and its Trademarks at the time of registration.

The Respondent's actual knowledge of the Complainant is evidenced by the Respondent's use of the disputed domain name to impersonate one of the Complainant's employees and send a fraudulent online inquiry to at least one other entity, and the Respondent's use of the disputed domain name to redirect to a parking page showing pay-per-click links to websites purportedly offering services similar to those of the Complainant. Besides, a quick search for the term "pulte" and/or "pulte group" online would have revealed to the Respondent the existence of the Complainant and its Trademarks. As a result, the Panel finds that the Respondent was aware of the Complainant's Trademark at the time of the registration of the disputed domain name. [WIPO Overview 3.0](#) section 3.2.2.

The Panel further notes that the disputed domain name creates a likelihood of confusion with the Complainant and its Trademarks, as well as with one of its domain names <pultegroupinc.com>. By registering and using the disputed domain name, the Respondent has intentionally attempted to abusively attract Internet users on its website containing pay-per-click links to other websites offering competing products and services, by creating a likelihood of confusion with the Complainant's Trademarks as to the source, sponsorship, affiliation, or endorsement of the Respondent's website. This constitutes bad faith under paragraph 4(b)(iv) of the Policy.

Moreover, panels have held that the use of a domain name for illegitimate activity, here phishing, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. In the present case, having reviewed the records, the Panel notes that the disputed domain name was used to send an email to a third party, requesting an offer for products, which constitutes a phishing attempt and therefore bad faith under the Policy.

The Panel further notes that the address mentioned by the Respondent when registering the disputed domain name is fictitious. The Complainant has evidenced that a search on Google Maps yields no matching results for the address given by the Respondent when registering the disputed domain name, suggesting that Respondent has provided false registration details. The Panel further notes that the address mentioned by the Respondent refers to "rue" and "blvd" (French abbreviation for "boulevard"), which cannot be correct as "rue" and "boulevard" both designate a type of street. This confirms that the Respondent has provided false contact information in order to hide its true identity.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under 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 <pultegroupcorp.com> be transferred to the Complainant.

/Mireille Buydens/

Mireille Buydens

Sole Panelist

Date: August 29, 2025