

ARBITRATION AND MEDIATION CENTER

# ADMINISTRATIVE PANEL DECISION

G4S Limited v. Samuel Fiadzo, saminc Case No. D2025-3019

#### 1. The Parties

The Complainant is G4S Limited, United Kingdom, represented by Safenames Ltd., United Kingdom.

The Respondent is Samuel Fiadzo, saminc, Ghana.

## 2. The Domain Name and Registrar

The disputed domain name <g4sglobl.com> is registered with GMO Internet, Inc. d/b/a Discount-Domain.com and Onamae.com (the "Registrar").

# 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 29, 2025. On July 29, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 30, 2025, the Registrar transmitted by email to the Center its verification response, confirming that the Respondent is listed as the registrant and providing the contact details.

The Center verified that the 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 August 4, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 24, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 25, 2025.

The Center appointed Kaya Köklü as the sole panelist in this matter on August 28, 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 London-based global security company which provides security and facility services in around 90 countries across the world. Initially founded in 1901, the Complainant has been operating under its current name since 2004. It presently has a network of more than 800,000 employees globally.

The Complainant is the owner of numerous G4S word and figurative trademark registrations worldwide. Among various others, the Complainant is the registered owner of the United States of America Trademark Registration No. 3378800, registered on February 5, 2008, for the word trademark G4S, covering protection for goods and services as protected in classes 9, 39, and 45, and the European Union Trademark Registration No. 015263064, registered on September 20, 2016, for the word trademark G4S, covering protection for goods and services as protected in classes 6, 36, and 37.

Since December 1, 1999, the Complainant also owns and operates its official website at <g4s.com>.

The Respondent is reportedly located in Ghana.

This disputed domain name was registered on June 9, 2025.

According to undisputed screenshots provided with the Complaint, the disputed domain name resolves to a webpage that allegedly offers transport services similar to the services provided by the Complainant.

Furthermore, the Complainant provided unrebutted evidence that the Respondent has configured a Mail Exchange ("MX") email server for the disputed domain name, which enables the Respondent to send and receive emails using the disputed domain name.

On June 12, 2025, the Complainant's legal representatives sent a cease-and-desist letter to the Respondent, but no response was received.

### 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

According to paragraph 15(a) of the Rules, the Panel shall decide the Complaint in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

In accordance with paragraph 4(a) of the Policy, the Complainant must prove that each of the three following elements is satisfied:

- (i) the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights;
- (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.

Paragraph 4(a) of the Policy states that the Complainant bears the burden of proving that all these requirements are fulfilled, even if the Respondent has not replied to the Complainant's contentions. Stanworth Development Limited v. E Net Marketing Ltd., WIPO Case No. <u>D2007-1228</u>.

However, concerning the uncontested information provided by the Complainant, the Panel may, where relevant, accept the provided reasonable factual allegations in the Complaint as true. See section 4.3 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("WIPO Overview 3.0").

For the evaluation of this case, the Panel has taken note of the <u>WIPO Overview 3.0</u>, and, where appropriate, will decide consistently with the consensus views stated therein.

## 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 Complainant has shown rights in respect of the G4S trademark for the purposes of the Policy. <u>WIPO Overview 3.0</u>, section 1.2.1.

The entirety of the G4S mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the G4S mark for the purposes of the Policy. <u>WIPO Overview 3.0</u>, section 1.7.

Although the addition of other terms, here "globl" may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. <u>WIPO Overview 3.0</u>, section 1.8.

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. Particularly, the Complainant put forward that the Respondent is neither an authorized business partner of the Complainant nor a licensee of its G4S trademark and that the Respondent is not commonly known by the term "g4sglobl" or any other similar terms. 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 further notes that the nature of the disputed domain name along with the content of the associated website (reproducing the Complainant's distinctive G4S trademark and allegedly offering services similar to the ones globally offered by the Complainant), while using the same color combination used by the Complainant on its own website at the domain name <g4s.com> indicates the Respondent's illegitimate intention to mislead Internet users into believing that the website is operated or endorsed by the Complainant.

Even more and bearing in mind that the Respondent has configured an MX email server for the disputed domain name, the Panel cannot exclude that the disputed domain name may have been used or will be used in connection with possibly fraudulent or illegitimate activities by the Respondent. Noting that the disputed domain name is confusingly similar to the Complainant's G4S trademark, and uses the additional term "globl", while the website at the disputed domain name claims to be operated by "G4S Global", these very terms (i.e. "G4S Global") are included in the browser tab title of the Complainant's website at "www.g4s.com"; noting also that the added term in the disputed domain name is a misspelling of "global", the Panel has no doubt that the Respondent's intent is to create confusion with the Complainant, which in view of the Panel results in an illegitimate use that can never confer rights or legitimate interests upon the Respondent.

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. <u>WIPO Overview 3.0</u>, section 3.2.1.

In the present case, the Panel notes that the Respondent was apparently aware of the Complainant and its G4S trademark when registering the disputed domain name. It is obvious to the Panel, that the Respondent has deliberately chosen the disputed domain name to target the Complainant and mislead Internet users.

With respect to the use of the disputed domain name, the Panel further notes that the confusingly similar disputed domain name resolves to a website deliberately creating the false impression of being operated by the Complainant or at least with its authorization.

Even more, the Panel believes that the nature of the disputed domain name and the active MX email server create a real or implied ongoing threat to the Complainant, since the disputed domain name may be used by the Respondent to mislead customers in a false belief that an email sent from the disputed domain name origins from the Complainant.

In the light of the above and having reviewed the record, the Panel has no doubts that the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy. The Panel is even convinced that this is a typical cybersquatting case, which the UDRP was designed to stop.

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 <g4sglobl.com> be transferred to the Complainant.

/Kaya Köklü/ Kaya Köklü Sole Panelist

Date: September 11, 2025