

## **ADMINISTRATIVE PANEL DECISION**

Palestine Children's Relief Fund, Inc. v. Rameen Aslam  
Case No. D2025-3054

### **1. The Parties**

The Complainant is Palestine Children's Relief Fund, Inc., United States of America ("United States" or "US"), represented by Flannery Georgalis, LLC, USA.

The Respondent is Rameen Aslam, Pakistan.

### **2. The Domain Name and Registrar**

The disputed domain name <pcrf-fund.net> is registered with GoDaddy.com, LLC (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 31, 2025. On July 31, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 31, 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 (Registration Private, Domains by Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 4, 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 August 8, 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 August 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 1, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 5, 2025.

The Center appointed Andrea Jaeger-Lenz as the sole panelist in this matter on September 11, 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 non-profit corporation based in the US, which provides fundraising services for providing medical care and humanitarian aid for children in the Middle East, including treatment, supplies, and broader relief efforts (Annexes 1 and 4 of the amended Complaint).

The Complainant owns the following trademarks (Annex 3 of the amended Complaint):

- US trademark registration no. 6811450, PCRF PALESTINE CHILDREN'S RELIEF FUND (fig.), registered on August 9, 2022, for services in Class 36;
- US trademark registration no. 6628268, PCRF (word), registered on January 25, 2022, for services in Class 36.

The Complainant operates the domain name <pcrf.net>, which resolves to its official website presenting its humanitarian and medical relief activities (Annex 4 of the amended Complaint).

The disputed domain name was registered on June 26, 2025. The website to which it resolves reproduces both Complainant's trademarks without alteration and contains content that closely resembles that on the Complainant's official website. This includes the replication of pages, icons, color schemes and texts as well as sections presenting humanitarian programs, donation appeals and relief campaigns, accompanied by imagery of aid distribution and fundraising activities (Annex 4 of the amended Complaint).

#### **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.

Concerning the first element, the Complainant contends that the disputed domain name is confusingly similar to its registered trademarks, both of which predate its registration. The slight alteration (in the form of the addition of the term "-fund") does not, in its view, prevent the finding of confusing similarity.

With regard to the second element, the Complainant asserts that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant has not authorized the Respondent to use its trademarks, and there is no indication that the Respondent is commonly known by the disputed domain name. According to the Complainant, the Respondent is imitating the Complainant's official website, which shows that the disputed domain name is not used for any bona fide purpose but rather to mislead potential donors.

On the third element, the Complainant asserts that the disputed domain name was registered and is being used in bad faith. The registration in 2025 occurred after the Complainant had acquired its trademark rights, and the deliberate choice of name demonstrates knowledge of these rights. Furthermore, the Complainant submits that the website at the disputed domain name copies the Complainant's trademarks and website content, deliberately creating a false impression of affiliation in order to mislead potential donors and divert funds.

## **B. Respondent**

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

## **6. Discussion and Findings**

### **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. In particular, it has shown rights in the trademark PCRF.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms (here "-fund") 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. [WIPO Overview 3.0](#), section 1.8.

It is also well established that the applicable Top-Level Domain ("TLD"), such as ".net" in the present case, is regarded as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1. The practice of disregarding the TLD in determining identity or confusing similarity is applied irrespective of the particular TLD (including with regard to "new gTLDs"). [WIPO Overview 3.0](#), section 1.11.2.

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.

Notably, the composition of the disputed domain name, which combines the Complainant's trademark with the descriptive term "-fund", which alludes to fundraising and is closely related to the Complainant's field of

charitable activities, coupled with the use of the disputed domain name to resolve to a website in which the Respondent tries to impersonate the Complainant, affirms the Respondent's intention of taking unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant as to the origin or affiliation of the website at the dispute domain name. Such use cannot be considered fair.

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.

In the present case, the Panel finds that the Respondent has registered and is using the disputed domain name in bad faith. The disputed domain name incorporates the Complainant's trademark in its entirety, with the addition of the descriptive element "-fund", alluding to the fundraising activities of the Complainant. In combination with the content of the associated website, the Panel considers the disputed domain name to have been deliberately created to falsely suggest an affiliation with the Complainant. The website reproduces the Complainant's trademarks and mimics the design and content of its official website, misleading Internet users, particularly potential donors, into believing that they are interacting with the Complainant. This constitutes an intentional attempt to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's mark. See Policy, paragraph 4(b)(iv); [WIPO Overview 3.0](#), section 3.1.4.

In line with the above, the Panel observes that the disputed domain name has been used to operate a so-called copycat version of the Complainant's website with the apparent intention of diverting funds and potentially collecting personal data from unsuspecting users. Panels have held that the use of a domain name for deceptive purposes, including phishing or other types of fraud, may constitute bad faith; in some such cases this has involved the Respondent hosting a copycat version of the Complainant's website, as is the case here. See [WIPO Overview 3.0](#), section 3.4.

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 <pcrf-fund.net> be transferred to the Complainant.

*/Andrea Jaeger-Lenz/*

**Andrea Jaeger-Lenz**

Sole Panelist

Date: September 25, 2025