

ADMINISTRATIVE PANEL DECISION

Scribd, Inc. v. Domain Privacy, Domain Name Privacy, Inc.
Case No. D2025-3297

1. The Parties

The Complainant is Scribd, Inc., United States of America (“United States”), represented by IPLA, United States.

The Respondent is Domain Privacy, Domain Name Privacy, Inc., Cyprus.

2. The Domain Name and Registrar

The disputed domain name <scribdownload.org> is registered with Communigal Communications Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 15, 2025. On August 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 19, 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 September 4, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 24, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 25, 2025.

The Center appointed Christopher J. Pibus as the sole panelist in this matter on October 1, 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 carries on business as a subscription-based digital content provider, offering an extensive library of ebooks, audiobooks, magazines, and other documents, through its principal website at “www.scribd.com”. It launched its website in September 2006 and first registered its trademark on April 20, 2010. Since 2007 the Complainant has provided its services in association with its mark to more than 1,950,000 paying subscribers, with traffic of over 200,000,000 unique visitors monthly.

The Complainant is the owner of registrations for the SCRIBD trade mark in many jurisdictions around the world, including the United States, United Kingdom, Canada, European Union, Thailand and India. The Complainant’s evidence includes certificates of registration, dating back to 2010, and a detailed summary of its international portfolio covering 29 countries.

Particulars of the Complainant’s registered word mark in the United States are as follows:

Trade Mark	Class	Registration No.	Registration Date
SCRIBD	9, 35, 38, 42	3777227	April 20, 2010
SCRIBD	9, 35, 38, 42	5898302	October 29, 2019

The Respondent has its identity protected by Domain Name Privacy, Inc. The disputed domain name was registered on December 5, 2024, and has been used periodically to redirect users to websites that contain links to competitive websites. Currently, the disputed domain name resolves to a website that is blocked due to a security threat and an apparent phishing scam.

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.

Notably, the Complainant contends that its SCRIBD trademark is highly distinctive and well-known internationally, with registrations around the world and a substantial online presence. The Complainant draws attention to a scam created by the Respondent which instructs users how to avoid subscribing to the Complainant’s services by illegally downloading copyrighted content from the Complainant’s platform. In the absence of any response from the Respondent, the Complainant urges the Panel to find deliberate targeting of the well-known mark for improper purposes.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, in order to succeed, the Complainant must establish each of the following elements:

- (i) the disputed domain name is identical or confusingly similar to the trademark or service mark 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.

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 provided evidence of the existence of relevant trademarks, by providing proof of a number of registrations including those listed in paragraph 4 above. Evidence of acquired reputation in the SCRIBD brand has also been provided to support the conclusion that the mark is known internationally for many years. The Panel concludes that the Complainant has established that it owns sufficient rights, for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the SCRIBD mark is reproduced within the disputed domain name and the Panel finds the mark is recognizable 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 "download", 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 name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8. See *Scribd, Inc. v. Fahad Mirza*, WIPO Case No. [D2024-2192](#).

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. In particular, the Complainant has presented evidence of the well-established international reputation it has garnered for the SCRIBD brand and has put forward cogent evidence and submissions that the Respondent has never been licensed or otherwise authorized to register or use the mark. The Respondent appears to have used its confusingly similar disputed domain name for various improper purposes, including redirecting users through links to other competitive websites, and offering a scam which instructs users how to avoid subscribing to the Complainant's services by illegally downloading copyrighted content from the Complainant's platform. These activities are consistent with deliberate targeting. 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 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 also 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. [WIPO Overview 3.0](#), section 3.2.1.

In the present case, the Panel notes that the Respondent has intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark, which constitutes bad faith under paragraph 4(b)(iv) of the Policy. The Respondent set out to target the Complainant by copying the SCRIBD word mark as the primary element of the disputed domain name. Panels have held that the use of a domain name for illegitimate activity (here, claimed passing off and illegal copying of copyrighted materials) constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

The Panel finds that the Respondent was likely fully aware of the Complainant's rights in the SCRIBD mark, due to the distinctive nature of the mark, the duration of its prior use and registrations dating back more than 10 years, and its extensive reputation around the world. The Panel notes the exact reproduction of the mark in the disputed domain name, used in combination with the descriptive suffix "download". The composition of the disputed domain name itself is compelling evidence of bad faith registration, as it promotes the unlawful downloading scam which is featured on the Respondent's website. In all the circumstances, it appears that the Respondent was knowingly targeting the Complainant when it registered the disputed domain name in December 2024.

In terms of bad faith use, the Panel acknowledges a number of factors disclosed in the evidence, including (1) the misappropriation of the exact SCRIBD mark for use on services which closely resemble the categories offered by the Complainant; (2) the adoption of the suffix "download", a descriptive term connected to the unlawful downloading tool actively promoted by the Respondent; (3) the Respondent's unlawful scheme to deprive the Complainant of revenue, by offering users the ability to avoid signing up for the Complainant's services by manipulating the target URL to allow for free access and download of documents and copyrighted materials ordinarily restricted to the Complainant's subscribers; (4) the Respondent's blatant promotion of its scam, advertising "Just change the domain name scribd.com to ScribdDownload.org on the Scribd link you want to download"; and (5) the Complainant has also pointed out that at various times the Respondent's associated website has redirected users to other sites offering services directly competitive to those of the Respondent. All of these elements are probative of deliberate targeting and bad faith.

The Panel finds the third element of the Policy has been established.

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 <scribddownload.org> be transferred to the Complainant.

/Christopher J. Pibus/

Christopher J. Pibus

Sole Panelist

Date: October 15, 2025