

ADMINISTRATIVE PANEL DECISION

ThreatLocker, Inc. v. Renato Boldetti

Case No. D2025-3836

1. The Parties

The Complainant is ThreatLocker, Inc., United States of America (“United States”) represented by Latham & Watkins LLP, United States.

The Respondent is Renato Boldetti, Italy.

2. The Domain Name and Registrar

The disputed domain name <threatlockers.com> is registered with Dynadot Inc (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 20, 2025. On September 22, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 24, 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 (Redacted for Privacy, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 29, 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 October 1, 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 October 14, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 3, 2025. The Response was filed with the Center on October 27, 2025.

The Center appointed Zoltán Takács as the sole panelist in this matter on November 4, 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 one of the leading providers of cybersecurity software being recognized for its products, including recognition as a 2024 SC Awards finalist in the Trust Award category for “Best Endpoint Security Solution”, a finalist for CNR’s 2023 Product of the Year Awards in the Security Category and a finalist for Cyber Defense Magazine’s “Top InfoSec Innovator” award for 2023.

The Complainant has also received a number of industry awards for its products, including the Channel Program’s Category Leaders” and “Highly Reviewed” awards for the third quarter of 2023.

The Complainant owns the United States Trademark Registration No. 5589062 for the word mark THREATLOCKER, registered on October 23, 2018. The Complainant has been using the trademark in connection with offering and promoting its products and services since as early as January 2017, as indicated on the trademark registration.

The Complainant also owns the International Trademark Registration No. 1794006 for the word mark THREATLOCKER, registered on January 17, 2024 and valid in 40 jurisdictions, including in Italy, the country where the Respondent is located.

The Complainant has registered the domain name <threatlocker.com> on January 16, 2017, which resolves to its primary website.

The Respondent claims to be an individual domain name investor and technology enthusiast based in Italy, having registered a portfolio of generic, technology-related domain names inclusive of the disputed domain name which was registered on January 6, 2025.

The disputed domain name has been resolving to a website where it has been offered for sale with the seller’s asking price being USD 10,000.

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:

- the disputed domain name, which fully incorporates its THREATLOCKER trademark with addition of the letter “s” is confusingly similar to the trademark;
- the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- the Respondent has registered and is using the disputed domain name primarily for the purpose of selling, renting, or otherwise transferring it to the Complainant or a competitor of the Complainant for the price exceeding the costs related to the disputed domain name, which is evidence of bad faith registration and use.

The Complainant requests that the disputed domain name be transferred from the Respondent to the Complainant.

B. Respondent

The Respondent contends that the Complainant has not satisfied any of the elements required under the Policy for the transfer of the disputed domain name, alleging:

- that he registered the disputed domain name as part of his broader portfolio of cybersecurity and technology-related domain names, without any knowledge of or intent to exploit the Complainant's trademark;
- that although the term "ThreatLocker" is a registered mark, the plural "ThreatLockers" is linguistically distinct and generic in cybersecurity terminology and cannot be monopolized by a single company;
- that he never hosted any website, email, or content related to the Complainant or its business;
- that the fact that the disputed domain name is offered for sale does not constitute bad faith, since domain resale when based on generic terms is a legitimate commercial activity; and
- that disputed domain name has been publicly listed for months on major marketplaces (GoDaddy, Sedo, Dynadot) – a standard and lawful activity in the domain industry – at a consistent price similar to the valuation of other domains in his portfolio, which is not "excessive" since pricing is determined by the global domain market and not by trademark owners.

The Respondent requests the Panel to dismiss the case and that the disputed domain name remain under his ownership.

6. Discussion and Findings

A complainant must evidence each of the three elements required by paragraph 4(a) of the Policy in order to succeed on the complaint, namely that:

- (i) the disputed domain name is identical or confusingly similar to a 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.

Based on the available record, the Panel finds 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 entirety of the Complainant's trademark is reproduced 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](#), section 1.7.

Notwithstanding the addition of the letter “s” to the trademark in the disputed domain name (which here may be perceived as a plural case) the Panel finds that such addition does not prevent a finding of confusing similarity between the disputed domain name and the trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8 and *i2 Technologies Inc. v. Richard Alexander Smith*, WIPO Case No. [D2001-0164](#); *Playboy Enterprises International, Inc. v. Tom Baert*, WIPO Case No. [D2007-0968](#).

The Panel finds that 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.

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 never received any authorization to use the Complainant’s THREATLOCKER trademark in a domain name or otherwise. The Respondent is not commonly known by the disputed domain name or the THREATLOCKER trademark. Further, there is no indication that the Respondent is making a noncommercial or fair use of the disputed domain name.

The Respondent’s use of the disputed domain name that is virtually identical to the Complainant’s trademark so obviously connected to the Complainant to offer it for sale does not establish rights or legitimate interests in a domain name under the Policy.

Noting also the further findings made under the third element of the Policy below, 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 view of the Panel the evidence in the case file indicates that the Respondent’s aim in registering the disputed domain name – a plural of the latter – was to profit from or exploit the Complainant’s trademark.

Contrary to the Respondent’s allegation, the Complainant’s THREATLOCKER trademark which the Respondent replicated in the disputed domain name is not – as combined – a generic term; it is a distinctive trademark. A basic Google search for the term “Threatlocker” provides results that appear solely to relate to the Complainant.

The Respondent alleges that he registered the disputed domain name as part of his broader portfolio of cybersecurity and technology-related generic domain names (“additional domain names”) and refers in his response multiple times to the term “cybersecurity”, which is exactly the Complainant’s field of business.

In consideration of the above facts and circumstances the Panel finds that it is more likely than not that the Respondent registered the disputed domain name having in mind the Complainant’s trademark and the goodwill the Complainant has established in its business sector. The Panel finds that the Respondent intended to target the Complainant and its trademark. The registration of the disputed domain name with intent to profit by knowingly exploiting the Complainant’s distinctive trademark which well predate the registration of the disputed domain name and offer it to sell to the highest bidder or otherwise to the general public is manifest evidence of bad faith registration and use within the meaning of paragraph 4(b)(i) of the Policy. [WIPO Overview 3.0](#), section 3.1.1.

In the circumstances, the Panel finds that the Respondent's asking price for the disputed domain name is far in excess of any conceivable or apparent registration costs and falls within the meaning of paragraph 4(b)(i) of the Policy. The Respondent's offer at this price is clear evidence of the Respondent's opportunistic bad faith intention to acquire and offer for sale the disputed domain name which is nearly identical to the Complainant's THREATLOCKER trademark.

Furthermore, in his exchange of correspondences with the Complainant's legal representatives before commencement of this proceeding and in his response to the Complaint the Respondent among others stated that "the domain was registered in good faith as part of my portfolio of generic, technology-related names....". However, the evidence indicate that the Respondent registered the "additional domain names" between August 6 and August 13, 2025, that is a month and a half later upon first being contacted by the Complainant's legal representatives in relation to the dispute concerning the disputed domain name. This in view of the Panel supports the inference that the purpose of the Respondent's registration of the "additional domain names" was to increase his bargaining leverage against the Complainant or to extract a favorable decision in relation to the disputed domain name, which is additional indication of the Respondent's bad faith.

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 <threatlockers.com> be transferred to the Complainant.

/Zoltán Takács/

Zoltán Takács

Sole Panelist

Date: November 18, 2025