

ARBITRATION AND MEDIATION CENTER

# ADMINISTRATIVE PANEL DECISION

Paramount Pictures Corporation v. Name Redacted Case No. D2025-3870

#### 1. The Parties

The Complainant is Paramount Pictures Corporation, United States of America ("United States" or "U.S."), internally represented.

The Respondent is Name Redacted.1

### 2. The Domain Name and Registrar

The disputed domain name <paramount-executives.com> is registered with IONOS SE (the "Registrar").

# 3. Procedural History

The Complaint<sup>2</sup> was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 23, 2025. On September 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 26, 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) 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 3, 2025.

<sup>&</sup>lt;sup>1</sup> The Respondent appears to have used the name of a third party when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted the Respondent's name from this Decision. However, the Panel has attached as Annex 1 to this Decision an instruction to the Registrar regarding transfer of the disputed domain name, which includes the name of the Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in these proceedings and has indicated that Annex 1 to this Decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. D2009-1788.

<sup>&</sup>lt;sup>2</sup> The Complaint was originally filed involving the disputed domain name and another domain name registered by a different registrant, which was subsequently removed from the current proceedings due to the settlement between the Complainant and this registrant.

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 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 30, 2025. Upon the Complainant's request, on October 20, 2025, the proceedings were suspended until November 19, 2025. On November 13, 2025, the proceedings were reinstituted with a new Response due date as November 24, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Parties of Commencement of Panel Appointment Process on November 26, 2025.

The Center appointed Knud Wallberg as the sole panelist in this matter on December 2, 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 producer and global distributor of filmed entertainment and a subsidiary of global mass media company Paramount Skydance Corporation, which through the Complainant and its affiliates creates and distributes premium content across a variety of platforms in numerous countries. The Complainant has since 1912 produced and distributed motion pictures and entertainment content under the trade name and trademark PARAMOUNT PICTURES and PARAMOUNT marks, including some of the famous movies as: the Mission: Impossible franchise, The Godfather trilogy, the Star Trek franchise, Top Gun, Ghost, Titanic and Forrest Gump among others.

The Complainant is the owner of a number of trademark registrations for the trademark PARAMOUNT with the U.S. Patent and Trademark Office ("USPTO") and around the world for its entertainment products and services, including United States Registration No. 5751277, PARAMOUNT (word), registered on May 14, 2019, for a range of entertainment content products and services in International Classes 9 and 41 and United States Registration No. 4428893, PARAMOUNT (figurative), registered on November 5, 2013 for a range of entertainment content products and services in International Classes 9 and 41.

The Complainant uses <paramount.com> to host the official website for its global businesses and brands and owns <paramountpictures.com> that features the Complainant's film, television and animation entertainment content, career opportunities and information about tours of the Complainant's studio.

#### 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 is confusingly similar to the PARAMOUNT trademark because it incorporates the trademark in its entirety.

The Complainant further contends that the Respondent does not have any rights or legitimate interests in the disputed domain name. The Complainant is not affiliated in any way with the Respondent, nor has the Complainant authorized the Respondent to use the PARAMOUNT trademark or any domain name incorporating the PARAMOUNT trademark. The Complainant also contends that Respondent has never been commonly known by the disputed domain names and that the disputed domain name is not used for any a bona fide offering of goods or services. On the contrary, the disputed domain name has been used to send fraudulent emails in which the Respondent impersonates one of the Complainant's employees to offer to turn the targeted individuals' books into screenplays for development for the Complainant in exchange for illegal money from them, just as the disputed domain name redirects to one of the Complainant's official websites.

The Complainant finally asserts that the Respondent registered and has been using the disputed domain name in bad faith. The Respondent could not plausibly be unaware of the Complainant's rights in the PARAMOUNT trademark when registering the disputed domain names just as the disputed domain name has been used in bad faith, as outlined above.

## **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.

Paragraph 4(a) of the Policy directs that a complainant must prove each of the following:

- (i) that the domain name registered by the respondent is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
- (ii) that the respondent has no rights or legitimate interests in respect of the domain name; and
- (iii) that the domain name has been registered and is being used in bad faith.

Paragraph 4(a) of the Policy states that the burden of proving that all these elements are present lies with the Complainant. At the same time, in accordance with paragraph 14(b) of the Rules, if a party, in the absence of exceptional circumstances, does not comply with any provision of, or requirement under, the Rules, or any request from the Panel, the Panel shall draw such inferences therefrom as it considers appropriate.

### 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 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. <u>WIPO Overview 3.0</u>, section 1.7.

Although the addition of other terms here, "-executives", 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.

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.

Panels have held that the use of a domain name for illegal activity here, claimed impersonation, phishing, or other types of fraud, 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.

The Panel notes that the disputed domain name was registered years after the Complainant's registration of its PARAMOUNT trademarks and has been redirected to the Complainant's website at its domain name paramountpictures.com>, which constitutes bad faith pursuant to paragraph 4(b)(iv) of the Policy.

In addition, the Panel notes that the Respondent has used the disputed domain name to send emails to targeted individuals that may be interested in working with or providing services to the Complainant, most likely with the purpose of soliciting personal information and money from the recipients. Panels have held that the use of a domain name for this type of illegal activity constitutes bad faith. 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 paramount-executives.com be transferred to the Complainant.

/Knud Wallberg/ Knud Wallberg Sole Panelist

Date: December 16, 2025