

## **ADMINISTRATIVE PANEL DECISION**

Games Global Operations Limited v. Cheap domain, treasureland  
Case No. D2025-3896

### **1. The Parties**

The Complainant is Games Global Operations Limited, United Kingdom, represented by McDonnell Boehnen Hulbert & Berghoff LLP, United States of America ("United States").

The Respondent is Cheap domain, treasureland, United States.

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

The disputed domain name <gamesglobai.com> is registered with NameCheap, Inc. (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 24, 2025. On September 25, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 25, 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 / Privacy Service Provided by Withheld for Privacy ehf) 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.

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 17, 2025. In accordance with the Rules, paragraph 5(a), the due date for Response was November 6, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on November 7, 2025.

The Center appointed Wilson Pinheiro Jabur, David H. Bernstein and Kathryn Lee as panelists in this matter on December 8, 2025. The Panel finds that it was properly constituted. Each member of 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**

Since 2002, the Complainant has developed and provided over 1,300 casino-style games, including online video slot machine games and other online casino-style games, under the GAMES GLOBAL trademark.

In addition to the domain name <gamesglobal.com>, under which the Complainant operates as its official webpage, the Complainant is the owner of the following trademark registrations and applications, among others (Annexes A and B to the Complaint):

- European Union trademark registration No. 018507528 for the word mark GAMES GLOBAL, filed on July 5, 2021, and registered on June 28, 2022, in classes 9, 28, 35, 38, 41, 42 and 45;
- European Union trademark registration No. 018507527 for the word and device mark GAMES G GLOBAL, filed on July 5, 2021, and registered on November 2, 2021, in classes 9, 28, 35, 38, 41, 42 and 45; and
- Pending United States trademark application No. 90793551 for the word mark GAMES GLOBAL, filed on June 24, 2021, and allowed on December 3, 2023, in classes 9, 35, 41, and 42 (with “Games” disclaimed).

The disputed domain name was registered on July 16, 2025, and presently does not resolve to an active webpage. The disputed domain name has been used in connection with a fraudulent email scheme, as an email address “[...]@gamesglobai.com” associated with the disputed domain name was used to contact a vendor of the Complainant, purporting to be the Complainant and requesting payment.

#### **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 asserts that the disputed domain name nearly incorporates the Complainant’s GAMES GLOBAL trademark, with the only difference being the replacement of the last letter “l” with “i”, and is therefore confusingly similar to it, especially considering that the lowercase letter “i” is similar in appearance to the lowercase letter “l”.

The Complainant further states that the Respondent has no rights or legitimate interests in respect to the disputed domain name, nor is it making any legitimate, non-commercial or fair use of the disputed domain name without intent for commercial gain, given that the disputed domain name has been used to deceptively operate an email address “[...]@gamesglobai.com” to contact vendors of the Complainant’s business operations, purporting to be the Complainant and demanding payment of fictitious invoices (Annex L to the Complaint).

The Complainant further asserts that the disputed domain name has been registered and used in bad faith given its use in connection with fraudulent email communications to request the payment of fictitious invoices to the Complainant’s vendors. In addition to that, the Complainant contends that the fact that the disputed domain name leads to an inactive webpage does not detract from the Respondent’s bad faith, and states that neither the Complainant nor its agents or affiliates authorized the Respondent to use a deceptive and confusingly similar misspelling of the Complainant’s GAMES GLOBAL trademark.

## B. Respondent

The Respondent did not reply to the Complainant's contentions.<sup>1</sup>

## 6. Discussion and Findings

Paragraph 4(a) of the Policy sets forth three requirements, which have to be met for this Panel to order the transfer of the disputed domain name to the Complainant:

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

The Complainant must prove in this administrative proceeding that each of the aforesaid three elements is present in order to obtain the transfer of the disputed domain name.

### 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.

Although the Complainant's pending US trademark application is insufficient on its own to establish trademark rights, the Complainant's ownership of registered trademarks in other jurisdictions is evidence of rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds that 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](#), sections 1.7 and 1.9.

Further, the disputed domain name is a case of typosquatting. Here, the disputed domain name is identical to the Complainant's mark, except that a lower case letter "i" was used in place of the letter "L." The two are essentially indistinguishable in many standard fonts. Previous UDRP panels have concluded that a domain name that consists of an intentional misspelling of a trademark is considered confusingly similar to the relevant trademark for the purposes of the first element, and an example of such a misspelling is the "substitution of similar-appearing characters." See [WIPO Overview 3.0](#), section 1.9.

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.

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<sup>1</sup>Given the absence of a Response, the Panel has carefully reviewed the record to ensure that the Respondent received the opportunity for fair notice of this proceeding. See *Nicole Kidman v. John Zuccarini, d/b/a Cupcake Party*, WIPO Case No. [D2000-1415](#). The Center sent notification of the Complaint to the Respondent by email and (DHL) courier. The courier package, which was sent to the address the Respondent recorded with the Registrar, could not be delivered because the address was not valid. The Center's email, however, appears to have been delivered to the Respondent. Regardless, if the Respondent did not receive actual notice, that is because it did not include accurate contact information in its domain name registration. The Panel finds that the Center has discharged its obligation to provide fair notice to the Respondent under Paragraph 2(a) of the Rules. See *Semo, Inc. v. CatalystMD, LLC*, WIPO Case No. [D2008-0647](#).

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.

According to the evidence submitted, the Complainant has made a prima facie case that the Respondent has not been commonly known by the disputed domain name and is not authorized, licensed, or allowed to use the Complainant’s trademark, whether in the disputed domain name, or in any other way.

Furthermore, the Respondent’s use of the disputed domain name in connection with an email address used to impersonate the Complainant requesting payment of false invoices does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use of the disputed domain name in these circumstances.

Panels have held that the use of a domain name for illegal activity – here, claimed impersonation/passing off, phishing and/or other types of fraud – can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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.

Under these circumstances and absent evidence to the contrary, the Panel finds that the Respondent does not have rights or legitimate interests with respect to the disputed domain name.

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 this case, the Complainant has submitted evidence that the Respondent is using the disputed domain name in a fraudulent scheme to impersonate the Complainant through emails to try to defraud the Complainant’s vendors by inducing them to make payments on fraudulent invoices. Such conduct is paradigmatic bad faith which alone is sufficient to show bad faith registration and use of the disputed domain name.

Panels have held that the use of a domain name for illegal activity – here, claimed impersonation/passing off – or other types of fraud, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain name constitutes bad faith under the Policy.

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 <gamesglobai.com> be transferred to the Complainant.

*/Wilson Pinheiro Jabur/*

**Wilson Pinheiro Jabur**

Presiding Panelist

*/David H. Bernstein/*

**David H. Bernstein**

Panelist

*/Kathryn Lee/*

**Kathryn Lee**

Panelist

Date: December 16, 2025