

ARBITRATION AND MEDIATION CENTER

ADMINISTRATIVE PANEL DECISION

World Wrestling Entertainment, LLC v. Shawn Zarek Williams, WEBDOMAIN.VEGAS INC.
Case No. D2025-3919

1. The Parties

Complainant is World Wrestling Entertainment, LLC, United States of America ("United States"), represented by The GigaLaw Firm, Douglas M. Isenberg, Attorney at Law, LLC, United States.

Respondent is Shawn Zarek Williams, WEBDOMAIN.VEGAS INC., United States.

2. The Domain Name and Registrar

The disputed domain name < www.vegas> (the "Domain Name") 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 September 25, 2025. On September 26, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On September 27, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the 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 to Complainant on September 29, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on September 30, 2025.

Respondent sent emails to the Center on September 29 and 30, 2025.

The Center verified that the Complaint together with the amendment to 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 Respondent of the Complaint, and the proceedings commenced on September 30, 2025. In accordance with the Rules, paragraph 5, the

due date for Response was October 20, 2025. Respondent sent further emails to the Center on October 1, 7 and 21, 2025, but Respondent did not submit any formal response.

The Center appointed Robert A. Badgley as the sole panelist in this matter on October 29, 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

According to the Complaint:

"Complainant is a part of TKO Group Holdings ("TKO"), a publicly traded company (NYSE: TKO). TKO is a premium sports and sports entertainment company that operates leading combat sport and sports entertainment companies and that is comprised of Complainant, a renowned sports entertainment business; and UFC, the world's premier mixed martial arts organization."

"TKO's properties reach one billion households across 210 countries and territories and organize more than 500 live events year-round, attracting more than three million fans. TKO also services and partners with major sports rights holders through IMG, an industry-leading global sports marketing agency; and On Location, a global leader in premium experiential hospitality."

According to TKO's 2024 annual report, TKO had annual revenue of more than USD 2 billion, of which nearly USD 1.4 billion was attributable to Complainant. TKO has more than 1,300 employees in 12 countries.

Complainant alleges further:

"Complainant creates and delivers original content 52 weeks a year to a global audience. Complainant is committed to family-friendly entertainment on its television programming, premium live events, digital media, and publishing platforms. Complainant's TV-PG programming can be seen in more than one billion households worldwide in more than 20 languages through world-class distribution partners including NBCUniversal, The CW and Netflix. In the United States, NBCUniversal's streaming service, Peacock, is the exclusive home to all premium live events, a variety of original programming and a massive video-on-demand library. Netflix is the exclusive home for WWE programming around the world, other than select international markets."

"Complainant has approximately 380 million social media followers. With more than 100 million subscribers, Complainant is the 13th most-viewed channel across all categories on YouTube."

"As of December 31, 2024, there were approximately 230 WWE 'Superstars,' or independent contractors, under contract from more than 20 countries."

Complainant owns hundreds of registered trademarks worldwide for the mark WWE or marks containing WWE. For instance, Complainant owns United States Reg. No. 2,772,683 for the mark WWE, registered on October 7, 2003 in connection with "entertainment services, namely, the production and exhibition of professional wrestling events rendered live and through the medium of television, providing wrestling news and information via a global computer network."

Complainant also owns Canadian Reg. No. TMA609412 for the mark WWE, registered on May 5, 2004 in connection with, among other things, magnets, posters, photographs, clothing, toy action figures and accessories.

Complainant has owned the domain name <www.com> since May 30, 1995, and has used that domain name to host its commercial website and promote its goods and services.

As noted in the Complaint, several previous UDRP panels have recognized Complainant's WWE trademark as "famous" or "well-known."

The Domain Name was registered on May 27, 2025. The Domain Name resolves to a fairly rudimentary web page containing several hyperlinks. According to Complainant:

"Respondent is using the Disputed Domain Name in connection with a pay-per-click ('PPC') or monetized parking page that includes links for various services that are related to Complainant's services and its WWE Trademark [...], including 'Wrestling Games', 'Raw Tickets', 'Ticketmaster Wwe Raw', and 'WWE Wrestling'."

According to Complainant, "Raw" is the name of one of its "flagship shows," and Complainant has used RAW as a trademark for more than 20 years. Annexed to the Complaint are documents corroborating the existence of Complainant's RAW trademark and the content of Respondent's website.

In its amended Complaint, after having received further registration details concerning the Domain Name and Respondent's identity, Complainant noted that Respondent had been found to have registered and used other domain names in bad faith in two prior UDRP proceedings, and that Respondent had registered at least 11 other domain names with the gTLD .vegas and a famous brand, such as <cadillac.vegas>, <lysol.vegas>, <netflix.vegas>, and <walgreens.vegas>.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name.

With respect to bad faith registration and use of the domain name, Complainant argues:

"[P]anels have repeatedly held that using a domain name in connection with a monetized parking page under the circumstances present here – including links labeled "Wrestling Games" and "Raw Tickets" [...], which are associated with the services described by Complainant's WWE Trademark [...] – constitutes bad faith."

In support of this proposition, Complainant cites several UDRP decisions, including *Columbia Pictures Industries, Inc. v. North West Enterprise, Inc.*, WIPO Case No. <u>D2006-0951</u>.

B. Respondent

Respondent did not submit a formal Response in this proceeding. As noted above, however, Respondent sent a series of emails to the Center.

On September 29, 2025, Respondent wrote in part:

"To pursuant to Article WWE.VEGAS; We do hereby will counter sue and summons/extradite to the US COURTS to be imprisoned for fraud and harassment Suspects: [Complainant's counsel and the Center's case manager]/ A Cease and Desist or a violation of ICANN and the FTC [United States Federal Trade Commission] will be brought up against you and the WIPO. We Request that a cease and desist be filed against yourself or we will fine your company and affiliates USD 100,000 for harassment. 1st Warning."

On September 30, 2025, Respondent sent at least three emails. In the first, claimed that the two prior UDRP cases in which he had been found in bad faith resulted in the trademark owner complainants paying Respondent to acquire the domain names. Respondent provided purported prices for each domain name

sale, but provided no evidence for his claims. In the second, Respondent largely railed against Complainant's counsel and his law firm. In the third, Respondent wrote:

"I agree to lock domain. I also agree that [Complainant's counsel] agree to reimburse Shawn Z Williams [Respondent] for GODADDY renew fees for over 12 years and purchase price. Total USD 100,000. When funds have been transferred then GODADDY will unlock to give to the other party. Thanks for your help to create a diplomatic solution to this unfortunate situation."

On October 1, 2025, Respondent sent the Center an email largely criticizing Complainant's counsel, and threatening to sue for defamation and discrimination. This was the last email of any arguable substance submitted by Respondent in this proceeding.

6. Discussion and Findings

Paragraph 4(a) of the Policy lists the three elements which Complainant must satisfy with respect to the Domain Name:

- (i) the Domain Name is identical or confusingly similar to a trademark or service mark in which Complainant has rights; and
- (ii) Respondent has no rights or legitimate interests in respect of the Domain Name; and
- (iii) the Domain Name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

The Panel concludes that Complainant has rights in the trademark WWE through extensive registration and longstanding and widespread use demonstrated in the record.

The Panel also concludes that the Domain Name is identical to the WWE mark.

Complainant has established Policy paragraph 4(a)(i).

B. Rights or Legitimate Interests

Pursuant to paragraph 4(c) of the Policy, Respondent may establish its rights or legitimate interests in the Domain Name, among other circumstances, by showing any of the following elements:

- (i) before any notice to you [Respondent] of the dispute, your use of, or demonstrable preparations to use, the Domain Name or a name corresponding to the Domain Name in connection with a bona fide offering of goods or services; or
- (ii) you [Respondent] (as an individual, business, or other organization) have been commonly known by the Domain Name, even if you have acquired no trademark or service mark rights; or
- (iii) you [Respondent] are making a legitimate noncommercial or fair use of the Domain Name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Panel concludes that Respondent lacks rights or legitimate interests in respect of the Domain Name. Other than making an unsupported and implausible assertion about having managed to sell two domain names not involved in this proceeding but in prior UDRP cases, and doling out various insults to Complainant and its counsel, Respondent has not come forward to dispute Complainant's plausible allegations about the fame of the WWE mark, Respondent's lack of any legitimate interest in the Domain Name, and the claim that Respondent is deriving per-click revenue from the website associated with the Domain Name.

From the record presented here, the Panel finds it obvious that Respondent was aware of Complainant and its WWE mark when he registered the Domain Name. This finding is bolstered by the fact that one of the

hyperlinks at Respondent's site made reference to RAW, another of Complainant's trademarks. The Panel also finds it clear from this record that Respondent registered the Domain Name in order to siphon off Internet traffic to its own website to derive commercial benefit on the back of the fame of Complainant and its WWE trademark. Such conduct is plainly illegitimate.

Complainant has established Policy paragraph 4(a)(ii).

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy provides that the following circumstances, "in particular but without limitation," are evidence of the registration and use of the Domain Name in "bad faith":

- (i) circumstances indicating that Respondent has registered or has acquired the Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Domain Name registration to Complainant who is the owner of the trademark or service mark or to a competitor of that Complainant, for valuable consideration in excess of its documented out of pocket costs directly related to the Domain Name; or
- (ii) that Respondent has registered the Domain Name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that Respondent has engaged in a pattern of such conduct; or
- (iii) that Respondent has registered the Domain Name primarily for the purpose of disrupting the business of a competitor; or
- (iv) that by using the Domain Name, Respondent has intentionally attempted to attract, for commercial gain, Internet users to Respondent's website or other online location, by creating a likelihood of confusion with Complainant's mark as to the source, sponsorship, affiliation, or endorsement of Respondent's website or location or of a product or service on Respondent's website or location.

The Panel concludes that Respondent has registered and used the Domain Name in bad faith. The Panel incorporates here its discussion above in the "Rights or Legitimate Interests" section. It is clear that Respondent had Complainant's mark in mind when registering the Domain Name. The reference to RAW and to WWE, as well as the wrestling-related hyperlinks, make this conclusion virtually inescapable. Respondent's use of the Domain Name constitutes bad faith use within the meaning of the above-quoted Policy paragraph 4(b)(iv).

Complainant has established Policy paragraph 4(a)(iii).

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 Domain Name <wwe.vegas> be transferred to Complainant.

/Robert A. Badgley/ Robert A. Badgley Sole Panelist

Date: November 7, 2025