

## ADMINISTRATIVE PANEL DECISION

Halliburton Energy Services, Inc. v. Great Avano, Multi Services  
Case No. D2025-4005

### 1. The Parties

The Complainant is Halliburton Energy Services, Inc., United States of America (“United States”), represented by Polsinelli PC, United States.

The Respondent is Great Avano, Multi Services, Nigeria.

### 2. The Domain Name and Registrar

The disputed domain name <halliburongroups.com> is registered with GMO Internet, Inc. d/b/a Discount- Domain.com and Onamae.com (the “Registrar”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 30, 2025. On October 1, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 2, 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 (Whois Privacy Protection Service by onamae.com) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 2, 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 amendment to the Complaint on October 7, 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 the Respondent of the Complaint, and the proceedings commenced on October 8, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 28, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 31, 2025.

The Center appointed Rodrigo Azevedo as the sole panelist in this matter on November 11, 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**

Founded in 1919, the Complainant is a United States based company that operates globally in the oil and gas industry.

The Complainant owns numerous trademark registrations for the mark HALLIBURTON in various jurisdictions. These include, among others, United States Trademark Registration No. 2,575,819, registered on June 4, 2002.

The Complainant also owns and operates the domain name <halliburton.com>, which was registered on October 17, 1995, and is used in connection with its official business activities.

The disputed domain name was registered on August 17, 2025.

The disputed domain name is not currently linked to an active website. The Complainant filed evidence that the disputed domain name was recently used by the Respondent to send e-mail messages pretending to be the Chief Recruitment Manager of the Complainant.

#### **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:

(i) The disputed domain name is identical or confusingly similar to the Complainant's trademark. The Complainant asserts that the disputed domain name is confusingly similar to its well-known HALLIBURTON trademark. The disputed domain name incorporates the entirety of the Complainant's mark, with only the addition of the term "groups", which does not prevent a finding of confusing similarity. The inclusion of such a generic term enhances rather than diminishes the risk of confusion, as it may misleadingly suggest a connection with the Complainant's corporate structure or affiliated entities. Furthermore, the generic Top-Level Domain ".com" is irrelevant for the purpose of the comparison under the Policy.

(ii) The Respondent has no rights or legitimate interests in the disputed domain name. The Complainant asserts that the Respondent is not affiliated with or authorized by the Complainant in any way and has never been licensed to use the HALLIBURTON trademark. The Respondent is not commonly known by the disputed domain name and has not acquired any trademark or service mark rights in the name. There is no evidence of the Respondent using the domain name in connection with a bona fide offering of goods or services. On the contrary, the Complainant has provided evidence that the disputed domain name has been used as part of a fraudulent scheme to impersonate the Complainant and deceive job applicants, which cannot constitute a legitimate or fair use.

(iii) The disputed domain name was registered and is being used in bad faith. The Complainant contends that the Respondent registered the disputed domain name with full knowledge of the Complainant's trademark rights, given the well-known and distinctive nature of the HALLIBURTON mark. The Complainant provided evidence that the disputed domain name was used in an attempt to impersonate the Complainant

and mislead job seekers. Additionally, the use of a privacy or proxy service which is known to block or intentionally delay disclosure of the identity of the actual underlying registrant is another indication of bad faith.

## **B. Respondent**

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

## **6. Discussion and Findings**

Paragraph 4(a) of the Policy provides that in order to be entitled to a transfer of the disputed domain name, a complainant shall prove the following three elements:

- (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.

Annex 4 to the Complaint shows numerous registrations for HALLIBURTON trademark obtained by the Complainant. 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 trademark HALLIBURTON is wholly encompassed within the disputed domain name, with the addition of the term "groups", as well as with the gTLD ".com".

Although the addition of other terms (here, "groups"), 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.

It is also well established that the addition of a gTLD, such as ".com", is typically disregarded when determining whether a domain name is confusingly similar to a complainant's trademark as such is viewed as a standard registration requirement. [WIPO Overview 3.0](#), section 1.11.1.

Based on the available record, 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.

The Complainant has not licensed nor authorized the use of its trademark to the Respondent, and the Panel finds no indication that the Respondent is commonly known by the disputed domain name.

Furthermore, the Complainant has shown that the disputed domain name was used by the Respondent to falsely impersonate the Complainant, sending email messages pretending to be the Complainant's Chief Recruitment Manager, which certainly cannot confer rights or legitimate interests.

Based on the available record, 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 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.

The Panel concludes that it is inconceivable that the Respondent was not aware of the Complainant's trademark and that the registration of the disputed domain name was a mere coincidence.

When the disputed domain name was registered (in 2025) the HALLIBURTON trademark was already directly connected with the Complainant's activities in the oil and gas industry.

The disputed domain name includes the distinctive trademark HALLIBURTON in its entirety. According to the [WIPO Overview 3.0](#), section 3.1.4, UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar to a famous or widely known trademark by an unaffiliated entity can by itself create a presumption of bad faith.

The addition of the term "groups" may falsely suggest to Internet users the mistaken belief that it is the official domain name of the Complainant corporate group.

Finally, panels have held that the use of a domain name for illegitimate activity – such as the use of the disputed domain name as part of a fraudulent email scheme to impersonate the Complainant and deceive job applicants (phishing and impersonation/passing off) – 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.

## 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 <halliburongroups.com> be transferred to the Complainant.

*/Rodrigo Azevedo/*  
**Rodrigo Azevedo**  
Sole Panelist  
Date: November 27, 2025