

ADMINISTRATIVE PANEL DECISION

Freeman Holding, LLC v. Cody Woods
Case No. D2025-4464

1. The Parties

The Complainant is Freeman Holding, LLC, United States of America ("United States"), represented by Porter Wright Morris & Arthur, LLP, United States.

The Respondent is Cody Woods, New Zealand.

2. The Domain Name and Registrar

The disputed domain name <freemman.com> is registered with Wild West Domains, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 29, 2025. On October 30, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same day, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name that differed from the named Respondent (Registration Private) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 31, 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 the same day.

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 November 5, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 25, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on November 26, 2025.

The Center appointed Matthew Kennedy as the sole panelist in this matter on November 28, 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, founded in 1927, is an event planning and management company. It holds multiple trademark registrations in multiple jurisdictions, including the following:

- United States trademark registration number 2645625 for FREEMAN, registered on November 5, 2002, with claims of first use in commerce on September 30, 1948, specifying services in classes 37, 39, 40, 42, and 43;
- European Union trademark registration number 004943072 for FREEMAN, registered on March 8, 2007, specifying services in classes 37, 39, 42, and 43; and
- International trademark registration number 1488779 for FREEMAN, registered on July 31, 2019, specifying services in class 35.

The above trademark registrations are current. The Complainant has also registered the domain name <freeman.com> that it uses in connection with a website where it provides information about its shows and allows customers to place orders for its services. That website displays eight industry awards that the Complainant won in 2024 and 2025.

The Respondent is an individual with a contact street address and telephone number in New Zealand.

The disputed domain name was registered on September 9, 2025. At the time when the Complaint was filed, it did not resolve to an active website. At the time of this Decision, the disputed domain name resolves to a parking page hosted by a domain name broker displaying Pay-Per-Click (“PPC”) links related to a multimedia streaming proxy server and conversion of MP3 files. A banner notice indicates that the broker service may be able to get the disputed domain name for an Internet user who is interested in it.

The Registrar confirmed that the language of the Registration Agreement for the disputed domain name is English.

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 identical or confusingly similar to its FREEMAN mark. The Complainant’s trademark registration and the continuous and extensive use of the FREEMAN mark for more than 90 years establish the Complainant’s proprietary rights in that mark. The disputed domain name is a case of typosquatting.

The Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent is not associated with the Complainant. The Complainant has never authorized the Respondent to use the FREEMAN trademark or any confusingly similar marks for any purpose, including as a domain name.

The disputed domain name was registered and is being used in bad faith. There is no basis for the Respondent to have chosen the disputed domain name other than to impersonate the Complainant. The disputed domain name does not resolve to an active website. It is a typosquatting variation of the Complainant's trademarks and domain name. In the alternative, it would be inconceivable that the Respondent was not aware of the Complainant's FREEMAN mark due to the mark's widespread recognition.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy provides that a complainant must demonstrate each of the following elements:

(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 burden of proof of each element is borne by the Complainant.

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. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 1.7.

The Complainant has shown registered rights in respect of the FREEMAN trademark for the purposes of the Policy. See [WIPO Overview 3.0](#), section 1.2.1. In the circumstances of this case, it is unnecessary to consider the Complainant's claim to unregistered rights in respect of that mark.

The disputed domain name contains a misspelling of the FREEMAN mark, in which the "m" is duplicated. Despite this difference, the disputed domain name is aurally identical to the mark and contains sufficient visually recognizable aspects of the mark. The only additional element in the disputed domain name is a generic Top-Level Domain ("gTLD") extension (".com") which, as a standard requirement of domain name registration, may be disregarded in the assessment of identity or confusing similarity for the purposes of the first element of the Policy. Accordingly, the disputed domain name is identical or confusingly similar to the mark for the purposes of the Policy. See [WIPO Overview 3.0](#), sections 1.9 and 1.11.1.

Therefore, 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. See [WIPO Overview 3.0](#), section 2.1.

In the present case, the disputed domain name did not resolve to any active website at the time when the Complainant was filed. At the time of this Decision, it resolves to a parking page displaying PPC links with no apparent connection to the disputed domain name and displaying a notice indicating that the disputed domain name may be available. The Complainant submits that the Respondent is not associated with it, nor authorized by it to use the FREEMAN trademark. None of these circumstances indicates that the Respondent is using the disputed domain name in connection with a bona fide offering of goods and services for the purposes of the Policy, nor that he is making a legitimate noncommercial or fair use of the disputed domain name.

Further, the Registrar has verified that the Respondent's name is listed in the Whois database as "Cody Woods", which does not resemble the disputed domain name. Nothing on the record of this proceeding indicates that the Respondent has been commonly known by the 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 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.

Based on the record, the Panel finds the second element of the Policy has been established.

C. Registered and Used 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 is being 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. See [WIPO Overview 3.0](#), section 3.2.1.

In the present case, the disputed domain name was registered in 2025, years after the registration of the Complainant's FREEMAN mark. The disputed domain name (spelt with a double "m") has no immediately obvious meaning and can readily be seen as a misspelling of "Freeman". For completeness, the Panel notes that an Internet search for "freemman" shows few results with a double "m", and even Microsoft Word autocorrects it to "freeman". While "Freeman" has other meanings besides the Complainant's mark, such as a dictionary word and a surname, the Panel notes that the disputed domain name is not only an obvious misspelling of the Complainant's mark but also an obvious misspelling of its domain name <freeman.com> (including the gTLD extension). Further, the Complainant has made widespread and longstanding use of its mark and its domain name and gained a certain reputation in the event planning and management sector. The Respondent offers no explanation for his choice of the disputed domain name. In view of these circumstances, the Panel can infer that the Respondent registered the disputed domain name with the Complainant's FREEMAN mark in mind.

As regards use, the disputed domain name did not resolve to any active website at the time when the Complainant was filed. At the time of this Decision, it resolves to a parking page displaying PPC links with no apparent connection to the disputed domain name and displaying a notice indicating that the disputed domain name may be available. Given that the disputed domain name appears to have no meaning other than as a misspelling, and that it is more likely than not that the disputed domain name is intended to be a misspelling of the Complainant's mark and domain name, the Panel infers that the Respondent is using the disputed domain name with a bad faith intention targeting the Complainant's mark.

Therefore, 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 <freemman.com> be transferred to the Complainant.

/Matthew Kennedy/

Matthew Kennedy

Sole Panelist

Date: December 12, 2025