

ADMINISTRATIVE PANEL DECISION

BioNTech SE v. Tang Owen

Case No. D2025-4506

1. The Parties

Complainant is BioNTech SE, Germany, represented by MSA IP - Milojevic Sekulic & Associates, Serbia.

Respondent is Tang Owen, Hong Kong, China.

2. The Domain Names and Registrars

The disputed domain names <aibiontech.com>, and <xbiontech.com> are registered with Gname 464 Inc, and Gname 484 Inc, respectively (collectively referred to as the “Registrar”).

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on October 31, 2025. On October 31, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name <aibiontech.com>. On November 3, 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 Complainant on November 5, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint in English on November 7, 2025, requesting addition of one more disputed domain name <xbiontech.com> in this proceeding. On November 7, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the newly added disputed domain name. On November 10 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to Complainant on November 11, 2025, providing the additional contact information disclosed by the Registrar.

On November 5, 2025, the Center informed the Parties in Chinese and English, that the language of the Registration Agreement for the disputed domain name is Chinese. On November 7, 2025, Complainant submitted its request that English be the language of the proceeding. Respondent did not submit any comment on Complainant’s language submission.

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 Respondent in Chinese and English of the Complaint, and the proceedings commenced on November 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 2, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on December 9, 2025. The late Response was filed with the Center in Chinese and English on December 10, 2025. Complainant filed a supplemental filing on December 11, 2025.

The Center appointed Yijun Tian as the sole panelist in this matter on December 17, 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

A. Complainant

Complainant is BioNTech SE, a company incorporated in Germany. Founded in 2008, it is a biotechnology company developing mRNA-based therapies and vaccines, including individualised cancer immunotherapies. In collaboration with Pfizer, Complainant launched “Project Lightspeed” and developed the widely known BioNTech/Pfizer COVID-19 vaccine (Annex 3 to the Complaint), which has received significant global recognition.

Complainant is the owner of numerous BIONTECH trademarks worldwide, including the International trademark registration for BIONTECH, registered on July 10, 2017 (registration number: 1370266); the European Union (EU) trademark registration for BIONTECH, registered on December 22, 2010 (registration number: 008964447); and the United States of America (“US”) trademark registration for BIONTECH, registered on April 2, 2019 (registration number: 5712036) (Annex 5 to the Complaint).

B. Respondent

Respondent is Tang Owen, Hong Kong, China.

The disputed domain names <aibiontech.com> and <xbiontech.com> were both registered on October 15, 2025.

According to the Complaint and the evidence submitted, the disputed domain name <aibiontech.com> redirected to a webpage offering the domain name for sale at a price of USD 6,500 (Annex 4 to the Complaint), while <xbiontech.com> redirected to a webpage offering the domain name for sale at a price of USD 3,500 (Annex 18 to the Complaint).

5. Parties’ Contentions

A. Complainant

Complainant contends that the disputed domain names are confusingly similar to Complainant’s BIONTECH trademark. Each disputed domain name incorporates the BIONTECH trademark in its entirety. The mere addition of the descriptive prefix “ai” or the letter “x” does not sufficiently distinguish the disputed domain names or prevent a finding of confusing similarity with Complainant’s trademark.

Complainant contends that Respondent lacks rights or legitimate interests in the disputed domain names.

Complainant contends that the disputed domain names were registered and are being used in bad faith. Respondent is also the registrant of other domain name registrations abusing well known trademarks, such as <youtubecoach.com>, <unitedautofinance.com>, and <ciscoworld.com> (Annex 19). Such a pattern of abusive registrations, along with the fact that Respondent is concealing its identity, should be viewed as strong evidence that Respondent is cybersquatter.

Complainant requests that the disputed domain names be transferred to it.

B. Respondent

Respondent contends that the Complaint constitutes a systemic challenge against a legitimate domain name investment business rather than evidence of bad faith cybersquatting. Respondent asserts that he is a professional domain name investor with a portfolio exceeding 10,000 domain names, and that the disputed domain names are normal components of his extensive and diversified portfolio.

Respondent contends that the disputed domain names comprise generic and descriptive terms: <aibiontech.com> combines “AI” (Artificial Intelligence) with “BionTech” to mean “Artificial Intelligence Biotechnology”, while <xbiontech.com> combines “X” (commonly used in technology to denote “exploration”, “the future”, or “platform”) with “BionTech” to mean “Exploratory Biotechnology” or “X Biotechnology Platform”.

Respondent contends that he has rights and legitimate interests in the disputed domain names because his registration and offering of descriptive, generic domain names for sale constitutes a “bona fide offering of goods or services” under the Policy. Respondent asserts that both disputed domain names were promptly listed for sale on the Registrar platform at fair market prices (USD 6,500 and USD 3,500) based on professional market valuation. Respondent provides evidence of third-party listings of structurally similar domain names (e.g., <symbiontech.com> listed at USD 12,500) to demonstrate that his pricing is within reasonable market range and constitutes a fair, fixed price offered to any potential end-user, not specifically targeted at Complainant.

Respondent contends that Complainant’s own conduct validates his investment logic. Respondent points to Complainant’s reported payment of approximately USD 950,000 in 2022 to acquire the domain name <biontech.com> from a third party. Respondent contends that this purchase constitutes an admission by the Complainant that “BionTech” has inherent market value as an industry-generic term independent of trademark rights, and completely validates the legitimacy and good faith of his investment in the disputed domain names, which follow the same commercial rationale. Respondent contends that Complainant’s willingness to pay market price for a similar domain name while seeking to acquire the disputed domain names at zero cost through UDRP demonstrates an attempt to systematically misuse the UDRP process to circumvent the open market, constituting Reverse Domain Name Hijacking.

Respondent contends that the disputed domain names were not registered and are not being used in bad faith. Respondent asserts that he registered the disputed domain names based on independent assessment of commercial potential in combining generic terms “AI” and “X” with “biotechnology”, and that Complainant’s attempt to monopolize all combinations containing “biontech” constitutes an abuse of trademark protection principles. Respondent contends that his highly diversified portfolio (including domain names such as <aiseowriter.com>, <aieasytools.com>, <biostyling.com>, and <convergebiotech.com>) corroborates the genuineness of his business and the dispersed nature of his investments, distinguishing him from cybersquatters who target a single trademark.

Respondent contends that he has never contacted Complainant to offer the disputed domain names for sale, nor has he created websites that could cause confusion with Complainant’s business. Respondent asserts that the disputed domain names have remained in a legal, passive status with for-sale listings since registration.

Respondent requests that the Panel deny the Complaint in its entirety, rule that the disputed domain names rightfully remain with him, and make a finding of Reverse Domain Name Hijacking against Complainant.

6. Discussion and Findings

6.1 Preliminary Issues

A. Language of the Proceeding

The language of the Registration Agreement for the disputed domain names is Chinese. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

From the evidence presented on the record, no agreement appears to have been entered into between Complainant and Respondent to the effect that the language of the proceeding should be English.

Complainant filed initially its Complaint and amended Complaint in English, and has requested that English be the language of the proceeding for the following reasons:

- (a) Complainant is an international company based in Germany, conducts its business in English, and has no knowledge of Chinese. Requiring translation into Chinese would impose a disproportionate and undue burden on Complainant.
- (b) Respondent appears capable of understanding English. The disputed domain names are composed entirely of Latin characters and include the English-language abbreviation "AI". Respondent has also registered other domain names incorporating common English words (Annex 19 to the Complaint).
- (c) Proceeding in English would promote procedural efficiency and avoid unnecessary delay, as English is a working language of the Center and the predominant language of international relations.

Respondent did not make any submissions with respect to the language of the proceeding, and the late Response was filed in both Chinese and English.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs (see WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.5.1).

On the record, Respondent appears to be located in China and thus presumably not a native English speaker, but considering the following aspects, the Panel has decided that the language of the proceeding shall be English: (a) the disputed domain names are registered in Latin characters (i.e., "biontech", "ai" and/or "x"), rather than Chinese script; (b) the generic Top-Level Domain ("gTLD") of the disputed domain names are ".com", so the disputed domain names seem to be prepared for users worldwide, particularly English speaking countries; (c) the webpages which the disputed domain names redirected to are in the English language; (d) the Center has notified Respondent of the language of the proceeding in both Chinese and English; (e) the Center also notified Respondent in both Chinese and English of the Complaint, and informed Respondent that it would accept a response in either English or Chinese, and Respondent chose to file the late Response in both Chinese and English.

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

B. Late Filing of Response

In the present proceeding, Respondent filed a Response after the due date. Respondent did not request the Center to extend the period of time for filing the Response prior to the deadline for filing the Response.

The Panel notes that the Rules do not expressly provide for the admissibility of a late Response.

In accordance with paragraph 10 of the Rules, and in order to fully consider the case, the Panel exceptionally accepts the late Response.

C. Supplemental Filing

In its supplemental filing, Complainant invites the Panelist, upon appointment, to not accept Respondent's late Response, as it was filed outside the 20-day time period for filing a response.

Complainant contends that Respondent is not a legitimate domain owner, as available records show that the Respondent holds numerous cybersquatting registrations abusing various well-known and distinctive third-party trademarks. Respondent's own late submission includes examples and screenshots of such abusive registrations, including: <barclaysbanks.com> - offered for sale at USD 6,500; <kiacar.com> - offered for sale at USD 3,500; <goldferrari.com> - offered for sale at USD 1,500; <oraclehyperion.com> - offered for sale at USD 3,500; <appleprinter.com> - offered for sale at USD 10,000; <iphonemirroring.com> - offered for sale at USD 16,500; and <freegmail.com> - offered for sale at USD 6,500.

This demonstrates that Respondent has engaged in pattern of registering domain names closely corresponding to third-party trademarks for commercial gain, and to prevent trademark holders from reflecting the marks in corresponding domain names. The Policy, paragraph 4(b)(ii), provides that this circumstance is evidence of registration and use of a domain name in bad faith.

In addition to this, Respondent's extensive references to the purchase of the <biontech.com> domain name indicate that the Respondent had a clear motive to register disputed domain names with Complainant in mind, for the purpose of selling them for a price far exceeding any out-of-pocket expenses, an indication of bad faith in accordance with Paragraph 4(b)(i) of the Policy. The Complainant finds it entirely unacceptable that any public reports of domain name purchases should serve as justification for registering cybersquatting domain names targeting the Complainant and its well-known BIONTECH brand.

Unsolicited supplemental filings are generally discouraged, unless specifically requested by the panel. In all such cases, panels have repeatedly affirmed that the party submitting or requesting to submit an unsolicited supplemental filing should clearly show its relevance to the case and why it was unable to provide the information contained therein in its complaint or response (e.g., owing to some "exceptional" circumstance). [WIPO Overview 3.0](#), section 4.6. In this case, the Panel considers that Complainant's supplemental filing contains the information that Complainant was unable to provide when filing of the Complaint. Therefore, the Panel accepts Complainant's supplemental filing.

6.2 Substantive Issues: Three Elements

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 Complainant's trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

Based on the available record, the Panel finds 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 Panel finds Complainant's BIONTECH mark is recognisable within the disputed domain names.

Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

While the additional letters “ai” or “x” may bear on the assessment of the second and third elements, the Panel finds the additional letters do not prevent a finding of confusing similarity between the disputed domain names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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 Respondent may demonstrate rights or legitimate interests in a disputed domain name.

While the overall burden of proof in UDRP proceedings is on the complainant, panels have recognised that proving a respondent lacks rights or legitimate interests in a domain name may result in the often impossible 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. 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 record, the Panel finds Complainant has established a *prima facie* case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted 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.

More specifically,

(i) there has been no evidence adduced to show that Respondent used the disputed domain names in connection with a bona fide offering of goods or services. Respondent has not provided evidence of reasons to justify the choice of the terms “biontech”, which, as combined, is Complainant’s BIONTECH trademark that enjoys long-standing prior use, in the disputed domain names. There has been no evidence to show that Complainant has licensed or otherwise permitted Respondent to use the BIONTECH or to apply for or use any domain names incorporating the BIONTECH marks;

(ii) there has been no evidence adduced to show that Respondent has been commonly known by the disputed domain names. Respondent registered the disputed domain names on October 15, 2025, after the BIONTECH mark was registered internationally (since 2017), in the EU (since 2010), and the US (since 2019). There has been no evidence adduced to show that Respondent has any registered trademark rights with respect to the disputed domain names. The disputed domain names are confusingly similar to Complainant’s BIONTECH marks; and

(iii) there has been no evidence adduced to show that Respondent was making any legitimate noncommercial or fair use of the disputed domain names. Notably, the disputed domain names redirected to webpages on which they were offered for sale. In these circumstances, Respondent’s use of Complainant’s mark to redirect users to aftermarket websites where they are offered for sale would not support a claim to rights or legitimate interests under the circumstances of this case. Given the reasons discussed in Section 6.2.C of the Decision, the Panel finds it more likely than not that Respondent registered the disputed domain names with the intent to capitalize on the reputation and goodwill of Complainant’s mark.

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 registrations and use of a domain names in bad faith.

In the present case, the Panel notes that Respondent has registered and used the disputed domain names 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.

In this case, the disputed domain names are confusingly similar to Complainant's BIONTECH trademark, which has been internationally registered since 2010. Since COVID-19, Complainant's reputation has increased significantly. The trademark BIONTECH is a somewhat unusual combination of terms/letters/words. *BioNTech SE v. Derek Joffrion*, WIPO Case No. [D2023-4970](#). Given the timing, it is not conceivable that Respondent was unaware of Complainant's trademark at the time of registration in 2025.

Based on the information provided in the Complaint, following the registrations, Respondent offered the disputed domain name <aibiontech.com> for sale at USD 6,500 (Annex 4 to the Complaint), and the disputed domain name <xbiontech.com> for sale at USD 3,500 (Annex 18 to the Complaint).

Furthermore, in the late Response, Respondent states that he has registered more than 10,000 domain names, and he operates a Gname storefront at "www.gname.vip/shop/305820". As the Complainant points out in the amended Complaint, and the supplemental filing, the Respondent holds numerous cybersquatting registrations abusing various well-known third-party trademarks, including: <youtubecoach.com>, <ciscoworld.com>, <barclaysbanks.com>, <kiacar.com>, and <goldferrari.com>. Such registrations demonstrate Respondent's intent to capitalize on the famous trademarks for commercial gain.

Thus, the Panel concludes, on the balance of probabilities, that Respondent's registrations and use of the disputed domain names are primarily for the purpose of selling, renting, or otherwise transferring the disputed domain names to Complainant or to a competitor of Complainant, for valuable consideration likely in excess of the documented out-of-pocket costs directly related to the disputed domain names. Such use constitutes bad faith pursuant to paragraph 4(b)(i) of the Policy.

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

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.0](#), section 4.16.

Respondent requests that the Panel make a finding of Reverse Domain Name Hijacking against Complainant.

Considering that Complainant has established all three elements of the Policy, the Panel declines Respondent's request.

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 names <aibiontech.com>, and <xbiontech.com> be transferred to Complainant.

/Yijun Tian/

Yijun Tian

Sole Panelist

Date: January 5, 2026