

ADMINISTRATIVE PANEL DECISION

American Airlines, Inc. v. Ankit saini, Expedo Booking Planner Private Limited
Case No. D2025-4519

1. The Parties

The Complainant is American Airlines, Inc., United States of America ("United States"), represented by Greenberg Traurig, LLP, United States.

The Respondent is Ankit saini, Expedo Booking Planner Private Limited, India.

2. The Domain Name and Registrar

The disputed domain name <americanairlineschange.com> 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 October 31, 2025. On November 3, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 6, 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 November 10, 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 November 13, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 3, 2025. The Respondent sent several email communications to the Center on November 9, November 10 and November 13, 2025. On December 5, 2025, the Center informed the Parties that it would commence the panel appointment process.

The Center appointed Tommaso La Scala as the sole panelist in this matter on December 12, 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 is one of the largest air carriers in the world, which serves over 350 destinations in over fifty countries, with nearly 7,000 daily flights.

The Complainant owns several registrations for AMERICAN AIRLINES, including among others:

- Indian Trademark Registration No. 605108, registered on August 25, 1993; and
- Indian Trademark Registration No. 1245961, registered on October 24, 2003, which are both registrations covering the country where the Respondent resides according to the Registrar.

The disputed domain name was registered on September 4, 2025, and it has been used to divert Internet traffic to a website, using the AMERICAN AIRLINES mark without any authorization, displaying “Find American Airlines Flights Book Latest Flight Deals & Save NOW!” and a flight search form.

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:

- (a) the disputed domain name is confusingly similar to the Complainant’s trademarks;
- (b) the Respondent lacks any rights or legitimate rights in the disputed domain name; and
- (c) the Respondent registered and is using the disputed domain name in bad faith, namely for impersonating the Complainant in order to mislead Internet users for undue commercial purposes.

B. Respondent

The Respondent did not substantively reply to the Complainant’s contentions but sent several informal email communications to the Center saying inter alia “Do whatever and I m selling this domain [name]”.

6. Discussion and Findings

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.

The Complainant has established rights in the AMERICAN AIRLINES trademark.

The disputed domain name consists of the AMERICAN AIRLINES trademark with the sole addition of the term “change”. This Panel agrees with the Complainant’s assertion that the Complainant’s mark is recognizable within the disputed domain name, and the additional term does not prevent a finding of confusing similarity between the Complainant’s trademark and the disputed domain name.

Therefore, the Panel finds the disputed domain name to be confusingly similar to the AMERICAN AIRLINES trademark in which the Complainant has rights.

Accordingly, 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.

This Panel finds that the Complainant has made a prima facie case that the Respondent does not have rights or legitimate interests in the disputed domain name. As a matter of fact, the Respondent does not appear to be commonly known by the name “american airlines” and/or any similar name. The Respondent has no connection to or affiliation with the Complainant, and the Complainant has not licensed or otherwise authorized the Respondent to use or register any domain name incorporating the Complainant’s trademarks. The Respondent does not appear to make any legitimate noncommercial or fair use of the disputed domain name, nor any use in connection with a bona fide offering of goods or services. The Panel notes that the Complainant provided copies of the Parties’ pre-Complaint email exchanges in which the Respondent, notably indicated “I have had [the disputed domain name] for years now but i don’t think i used logos or anything like that.” The record of this case shows that the disputed domain name resolves to a website displaying “Find American Airlines Flights Book Latest Flight Deals & Save NOW!” and a flight search form against a background image of an aircraft. To the extent that the website may be regarded as purporting to resell the Complainant’s flight services, it contains no disclosure or other information indicating its lack of relationship with the Complainant. In the absence of any explanation as to the Respondent’s choice of the disputed domain name, the Panel finds that the composition of the disputed domain name (incorporating the Complainant’s well-known mark) coupled with its use affirm the Respondent’s intention of taking unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant as to the origin or affiliation of the website.

Having reviewed the available record and considering that 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 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.

The substantial reputation attached to the Complainant's mark, the absence of any explanation by the Respondent for its choice of the disputed domain name, and the use of the disputed domain name as described above, in the Panel's view, show that the Respondent likely not only knew of the Complainant and its trademarks, but intentionally intended to target it.

The Panel finds that the Respondent's registration and use of the disputed domain name qualify as bad faith registration and use under the Policy.

The Panel finds the third element of the Policy has been established.

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 <americanairlineschange.com> be transferred to the Complainant.

/Tommaso La Scala/

Tommaso La Scala

Sole Panelist

Date: December 26, 2025