

ADMINISTRATIVE PANEL DECISION

Ford Motor Company v. Lauren Kennerley, Morgan Preston, John Smith, Joshua Perreira, Rhonda Arroyo, Juan Colwell, Dennie Schoonen, Scott Peacock, Naomi Jenkins, Georgia Hughes
Case No. D2025-4543

1. The Parties

The Complainant is Ford Motor Company, United States of America (“United States” or “U.S.”), represented by Kucala Burgett Law LLC, United States.

The Respondents are Lauren Kennerley, Morgan Preston, John Smith, Joshua Perreira, Rhonda Arroyo, Juan Colwell, Dennie Schoonen, Scott Peacock, Naomi Jenkins, and Georgia Hughes, United States.

2. The Domain Names and Registrars

The disputed domain names <fmcapplnowway.com>, <fmcemployfinder.com>, <fmceexperienceway.com> <fmcjobsfuturepath.com>, <fmcjobsnextstep.com>, <fmcjobsworld.com>, <fomocoemploylinker.com> <fomocoexperiencehorizon.com>, <fomocoexperienceorbit.com>, <fomocointerviewcal.com>, <fomocorecruitpoint.com>, and <fomocotalentvanguardpro.com> are registered with Cosmotown, Inc.

The disputed domain names <fmc-leadercareers.com>, <fmc-nationalstaffing.com>, and <fmc-talentdiscoverer.com> are registered with Hello Internet Corp.

The disputed domain names <fordcareerfoundation.com>, <fordfutureprofessionals.com>, <fordglobalcareercommunity.com>, <fordglobaltalent.com> and <fordskillset.com> are registered with Dynadot Inc.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 4, 2025. On the same date, the Center transmitted by email to Cosmotown, Inc. and Dynadot, LLC requests for registrar verification in connection with the disputed domain names identified in the Complaint. ¹

¹ The Center also sent Hello Internet Corp on the same date a request for registrar verification in connection with three domain names that have been removed from the current proceedings according to the Complainant’s request.

On November 5, 2025, and November 8, 2025, Cosmotown, Inc. and Dynadot, LLC respectively transmitted their verification responses to the Center, disclosing registrant and contact information for the disputed domain names that differed from the Respondents named in the Complaint, including NA and REDACTED FOR PRIVACY (DT), Super Privacy Service LTD c/o Dynadot. On November 16, 2025, the Complainant filed a first amended Complaint, adding the disputed domain names <fmc-leadercareers.com>, <fmc-nationalstaffing.com>, and <fmc-talentdiscoverer.com>. On November 17, 2025, the Center transmitted by email to Hello Internet Corp. a request for registrar verification in connection with the additional disputed domain names <fmc-leadercareers.com>, <fmc-nationalstaffing.com>, and <fmc-talentdiscoverer.com>. On November 21, 2025, Hello Internet Corp. transmitted its verification response to the Center, disclosing registrant and contact information for these additional disputed domain names that differed from the Respondent named in the amended Complaint, including Hello Internet Privacy Service.

The Center sent an email communication to the Complainant on November 24, 2025, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all disputed domain names are under common control. The Complainant filed a second amended Complaint on November 30, 2025.

The Center verified that the Complaint together with the amended Complaints 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 Respondents of the Complaint, and the proceedings commenced on December 2, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 22, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on December 23, 2025.

The Center appointed William F. Hamilton as the sole panelist in this matter on January 6, 2026. 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, Ford Motor Company, is one of the world's largest and most established automobile manufacturers with a history dating back to around 1895. The Complainant operates globally and employs a substantial workforce across manufacturing, engineering, sales, and corporate functions. The FORD name is widely known throughout the world. The Complainant promotes its business at "www.ford.com" and operates a Global Talent Acquisition portal located at "www.careers.ford.com".

The Complainant is the owner of numerous trademark registrations for the mark FORD, including United States Trademark Registration No. 74,530, filed on March 26, 1909, and registered on July 20, 1909, covering automobiles and related goods. The Complainant also owns registered trademark rights in the trademark FOMOCO, including United States Trademark Registration No. 3,645,991, filed on June 5, 2008, and registered on June 30, 2009.

The disputed domain names were registered over a short period between early October and early November 2025. At the time of filing of the Complaint, the disputed domain names <fordcareerfoundation.com>, <fordfutureprofessionals.com>, <fordglobalcareercommunity.com>, <fordglobaltalent.com>, and <fordskillset.com> were used for sending fraudulent emails to the public about employment opportunities at the Complainant while the remaining disputed domain names resolved to virtually identical websites

displaying the FORD mark, the Complainant's "Movers, Makers" campaign logo, and links to fake job opportunities. When Internet users clicked on any of these links, they were prompted to "Sign in or create your Career Profile" – a pop-up window prominently showing the FORD mark. These websites also included "©2024 Ford Motor Company" at the bottom.

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 names.

Notably, the Complainant contends that the public recognizes Ford as FMC which is another acronym for Ford Motor Company. The Complainant uses FMC on communications, in subsidiary trade names, and on its official website as shorthand for Ford Motor Company. Therefore, the Complainant asserts it has common law rights in the trademark FMC. Each of the disputed domain names prominently incorporates one of the Complainant's trademarks, FORD, FOMOCO, and FMC, in its entirety, together with additional terms commonly associated with employment, recruitment, or career opportunities.

The Complainant further contends that the Respondents have no rights or legitimate interests in the disputed domain names. The Respondents are not affiliated with the Complainant in any way, have not been authorized to use the Complainant's trademarks, and are not commonly known by the disputed domain names. The Complainant asserts that the disputed domain names have not been used, and were not intended to be used, in connection with any bona fide offering of goods or services, nor for any legitimate noncommercial or fair use.

The Complainant contends the disputed domain names were registered and are being used in bad faith. The Complainant contends that the disputed domain names form part of a coordinated scheme to impersonate the Complainant and to target unsuspecting job applicants. According to the Complainant, the Respondents have used, or intended to use, email addresses associated with some of the disputed domain names to pose as representatives of the Complainant in connection with purported employment or recruitment opportunities. These fraudulent emails included hyperlinks redirecting Internet users to the impersonating websites at some of the other disputed domain names. Through such impersonation, the Respondents allegedly sought to obtain personal and potentially sensitive information from job seekers, including information typically provided in the hiring process. In support of these contentions, the Complainant submits copies of email communications and related materials falsely purporting to originate from the Complainant's recruitment operations and screenshots of the impersonating websites.

The Complainant further contends that the Respondents' bad faith is underscored by their use of subdomains associated with the disputed domain names to create email addresses and online identifiers that mimic legitimate internal departments or recruitment functions of the Complainant. According to the Complainant, the use of such subdomains enhanced the deceptive appearance of the communications, reinforced the false impression of affiliation with the Complainant, and facilitated the impersonation of the Complainant in connection with purported employment opportunities.

B. Respondents

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

6. Discussion and Findings

Consolidation: Multiple Respondents

The second amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

As regards common control, the Panel finds that the Complainant has presented a *prima facie* case that the disputed domain names are subject to common control. The disputed domain names were registered over a short and compressed period and follow an identical pattern of composition, each combining one of the Complainant's marks in whole or in part with employment-related terms. The record further shows that the Respondents' email addresses also follow an identical pattern of composition, each starting with letters followed by numbers using a Gmail account and the listing of registration addresses that are facially invalid or incomplete. Moreover, according to the Complainant, 15 out of 20 disputed domain names resolved to virtually identical websites impersonating the Complainant while the remaining five disputed domain names that had been used for fraudulent emails contained hyperlinks redirecting users to some of those impersonating websites.

In addition, according to the Complainant, the disputed domain names appear to be deployed as part of a much broader coordinated and operationally integrated scheme to impersonate the Complainant and target prospective job seekers through email communications, including the use of consistent false messaging, and recruitment approaches across multiple domain names and the use of hyperlinks redirecting users to the websites impersonating the Complainant. These circumstances support a finding of common control.

As regards fairness and equity, the Panel sees no indication that consolidation would prejudice any of the Respondents. The Respondents have been afforded proper notice and an opportunity to respond, but they have not objected to the Complainant's consolidation request. The Panel finds that consolidation promotes procedural efficiency considering the complaints arise from substantially identical facts and conduct.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

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 trademarks and the disputed domain names. [WIPO Overview 3.0](#), section 1.7.

The Complainant has shown rights in respect of the marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds that the FORD or FOMOCO mark is entirely incorporated within the disputed domain names <fomocoemploylinker.com>, <fomocoexperiencehorizon.com>, <fomocoexperienceorbit.com>,

<fomocointerviewcal.com>, <fomocorecruitpoint.com>, <fomocotalentvanguardpro.com>, <fordcareerfoundation.com>, <fordfutureprofessionals.com>, <fordglobalcareercommunity.com>, <fordglobaltalent.com>, and <fordskillset.com>. Each of the disputed domain names begins with one of the marks and is followed by terms associated with employment. Accordingly, the disputed domain names are confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel finds that the remaining disputed domain names <fmcapplynowway.com>, <fmcemployfinder.com>, <fmcxperienceway.com>, <fmcjobsfuturepath.com>, <fmcjobsnextstep.com>, <fmcjobsworld.com>, <fmc-leadercareers.com>, <fmc-nationalstaffing.com>, and <fmc-talentdiscoverer.com> contain sufficiently recognizable aspects of the FOMOCO mark in light of the totality of the circumstances. These disputed domain names were registered together with other six disputed domain names that incorporate the Complainant's FOMOCO mark in its entirety. These disputed domain names also follow the pattern of other 11 disputed domain names, each begins with partial of the FOMOCO mark followed by terms associated with employment. Further, according to the Complaint, all these disputed domain names resolved to virtually identical websites attempting to pass off as the Complainant at the time of filing of the Complaint. [WIPO Overview 3.0](#), section 1.7 provides that “[i]n specific limited instances, while not a replacement as such for the typical side-by-side comparison, where a panel would benefit from affirmation as to confusing similarity with the complainant's mark, the broader case context such as website content trading off the complainant's reputation, or a pattern of multiple respondent domain names targeting the complainant's mark within the same proceeding, may support a finding of confusing similarity.” The Panel finds that the overall facts and circumstances of this case (including relevant website content and the Respondent's registration of other disputed domain names) may support a finding of confusing similarity.

Although the addition of many other terms in all the disputed domain names may bear on the assessment of the second and third elements, the Panel finds the addition of such terms 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.

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 names. 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 names such as those enumerated in the Policy or otherwise.

Panels have held that the use of a domain name for impersonation and phishing, as is the case here, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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.

In the present case, the Panel finds that the Respondent has engaged in a coordinated scheme to impersonate the Complainant in the context of employment recruitment and to obtain personal and financial information from unsuspecting job applicants. The disputed domain names incorporate the Complainant's marks with terms commonly used in recruitment and hiring, and were registered in multiple variations designed to appear plausibly connected to the Complainant's legitimate employment operations.

The record further indicates that some of the disputed domain names were used to create email addresses that falsely purported to originate from the Complainant, including using subdomains or structured email formats suggestive of internal recruitment or human resources functions. Examples of such communications, which reproduce the Complainant's branding and invite recipients to proceed with interviews or next steps in a purported hiring process, are included in Annex G. Such use was calculated to enhance the deceptive appearance of the communications and to reinforce the false impression of affiliation with or sponsorship by the Complainant.

The Panel further notes that the Respondent's use these disputed domain names closely mirrors the Complainant's legitimate branding and recruitment presentation, including the use of the Complainant's distinctive FORD circle logo, as illustrated by the Complainant's official "From the Road" content submitted in Annex H.

The remaining disputed domain names, at the time of filing of the Complaint, resolved to virtually identical websites attempting to pass off as the Complainant's websites for Global Talent Acquisition portal, submitted in Annex E. Examples of these impersonation websites are included in Annex I and Amended Annex I.

Having reviewed the available case record, the Panel finds that the Respondent has registered and used the disputed domain names in bad faith.

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 names <fmccapplynowway.com>, <fmccemployfinder.com>, <fmccexperienceway.com>, <fmccjobsfuturepath.com>, <fmccjobsnextstep.com>, <fmccjobsworld.com>, <fomocoemploylinker.com>, <fomocoexperiencehorizon.com>, <fomocoexperienceorbit.com>, <fomocointerviewcal.com>, <fomocorecruitpoint.com>, <fomocotalentvanguardpro.com>, <fmc-leadercareers.com>, <fmc-nationalstaffing.com>, <fmc-talentdiscoverer.com>, <fordcareerfoundation.com>, <fordfutureprofessionals.com>, <fordglobalcareercommunity.com>, <fordglobaltalent.com>, and <fordskillset.com> be transferred to the Complainant.

*/William F. Hamilton/
William F. Hamilton
Sole Panelist
Date: January 20, 2026*