

ADMINISTRATIVE PANEL DECISION

Freeman Holding, LLC v. George Bateman
Case No. D2025-4565

1. The Parties

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

The Respondent is George Bateman, United States.

2. The Domain Name and Registrar

The disputed domain name <freeman-international.com> is registered with Automattic Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 4, 2025. On November 5, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 6, 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, Knock Knock WHOIS Not There, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 7, 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 11, 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 did not submit any response. Accordingly, the Center notified the Respondent’s default on December 5, 2025.

The Center appointed Evan D. Brown as the sole panelist in this matter on December 9, 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 in the business of providing global event planning and management services. It owns the trademark FREEMAN and enjoys the benefits of registration of various forms of the mark in several jurisdictions, including the United States (e.g., Reg. No. 2,645,625, registered on November 5, 2002, with a first use date of September 30, 1948).

According to the Whois records, the disputed domain name was registered on September 2, 2025. The Respondent has not used the disputed domain name in connection with an active website.

5. Parties' Contentions

A. Complainant

The Complainant contends that the disputed domain name is identical or confusingly similar to the Complainant's trademark; that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and that the disputed domain name was registered and is being used in bad faith.

B. Respondent

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

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (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. The Panel finds that all three of these elements have been met in this case.

A. Identical or Confusingly Similar

This first element functions primarily as a standing requirement. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7. The standing test involves a straightforward comparison between the Complainant's trademark and the disputed domain name.

A registered trademark provides a clear indication that the rights in the mark belong to its owner. See *Advance Magazine Publishers Inc., Les Publications Conde Nast S.A. v. Voguechen*, WIPO Case No. [D2014-0657](#). The Complainant has submitted evidence of its trademark registration for the FREEMAN mark, thereby establishing rights in the mark. See [WIPO Overview 3.0](#), section 1.2.1.

The disputed domain name incorporates the FREEMAN mark in its entirety and appends the descriptive term "international" and a hyphen. The inclusion of this additional term does not prevent a finding of confusing similarity. Where the relevant trademark is recognizable within the disputed domain name, the addition of descriptive or geographical terms does not negate confusing similarity. See [WIPO Overview 3.0](#), section 1.8.

It is well established that the generic Top-Level Domain, such as “.com,” is disregarded when evaluating identity or confusing similarity under the first element. See [WIPO Overview 3.0](#), section 1.11.1.

The Panel therefore finds that the Complainant has established the first element under the Policy.

B. Rights or Legitimate Interests

The Panel considers whether the Complainant has made a prima facie showing that the Respondent lacks rights or legitimate interests in the disputed domain name. If the Complainant succeeds in doing so, the burden of production shifts to the Respondent. See [WIPO Overview 3.0](#), section 2.1.

On this point, the Complainant asserts that the Respondent is not using the disputed domain name in a bona fide offering of goods or services (or at all), is not engaged in any legitimate noncommercial or fair use, and has no relationship with the Complainant that would give rise to a license, permission, or other authorization to use the FREEMAN mark. The Complainant further states, upon information and belief, that the Respondent has no rights in the FREEMAN mark or any confusingly similar variation.

The Panel finds that the Complainant has made the required prima facie showing. The Respondent has failed to respond or present any evidence to rebut the Complainant's assertions. Nothing in the record otherwise tips the balance toward the Respondent's favor.

Accordingly, the Panel finds that the Complainant has established the second element under the Policy.

C. Registered and Used in Bad Faith

The Policy requires the Complainant to establish that the disputed domain name was registered and is being used in bad faith.

The Panel finds that the Complainant has satisfied this requirement. The record shows that the FREEMAN mark is long-standing and well known, with multiple trademark registrations internationally, some dating back to 2002. The Complainant's LinkedIn page boasts more than 90,000 followers, with a company size between 5,000 – 10,000 employees.¹ The Complainant's website lists offices throughout the United States as well as Canada. The record indicates that notification of the Complaint was seemingly delivered to the email address provided by the registrant of the disputed domain name to the Registrar, and written notice of the proceeding was successfully delivered by courier to the mail address provided to the Registrar when registering the disputed domain name. These alone are not dispositive of registration in bad faith. However, absent any evidence or argument to the contrary from the Respondent, the Panel credits the Complainant's assertions that the Respondent's actions appear designed to suggest an affiliation with the Complainant. Internet users who come across the disputed domain name, which contains the Complainant's trademark and the term “international” (which is indicative of the Complainant's services offered worldwide) are likely to associate the disputed domain name as being affiliated with the Complainant.

Further, given the asserted notoriety of the FREEMAN mark, the Panel finds that the Respondent either knew or should have known of the Complainant's rights at the time the disputed domain name was registered. The Complainant's United States trademark registration gives rise to constructive notice.

Although the disputed domain name has not been used in connection with an active website, the Panel finds that the passive holding supports a finding of bad faith here. Panels have held that the non-use of a domain name does not prevent a finding of bad faith where, as here, the complainant's mark is well known and the respondent has not come forward with a response or any evidence of good-faith use. See [WIPO Overview 3.0](#), section 3.3.

¹Noting in particular the general powers of a panel articulated inter alia in paragraphs 10 and 12 of the UDRP Rules, it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision. WIPO Overview, section 4.8.

On the totality of the evidence, the Panel concludes that the Respondent registered and is using the disputed domain name in bad faith.

Accordingly, the Panel finds that the Complainant has established the third element 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 <freeman-international.com> be transferred to the Complainant.

/Evan D. Brown/

Evan D. Brown

Sole Panelist

Date: December 18, 2025