

ADMINISTRATIVE PANEL DECISION

FGRMTech Pte Ltd v. Hoang Kim

Case No. D2025-4683

1. The Parties

The Complainant is FGRMTech Pte Ltd, Singapore, self-represented.

The Respondent is Hoang Kim, Viet Nam, self-represented.

2. The Domain Name and Registrar

The disputed domain name <onwardtickets.net> is registered with Porkbun LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 12, 2025. On November 12, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 13, 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 (Whols Privacy, Private by Design, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 13, 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 amended Complaints on November 14 and 15, 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 Respondent of the Complaint, and the proceedings commenced on November 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 8, 2025. The Response was filed with the Center on November 19, 2025.

The Center appointed Kaya Köklü as the sole panelist in this matter on November 21, 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 a company with its registered seat in Singapore that provides temporary flight reservations as proof of an onward journey, particularly in situations where such proof is required by airlines or immigration authorities.

The Complainant is the owner of the United States of America Trademark Registration No. 7,045,875, registered on May 9, 2023, for ONWARD TICKET, covering protection related to mainly travel ticket reservations services as protected in International Class 39.

The Complainant further operates its official website in various language versions at the domain name <onwardticket.com>. On its website, the trademark ONWARD TICKET is prominently used together with a “TM” designation to indicate trademark protection. The color scheme of the Complainant’s website includes various shades of blue, green, yellow, and pink; notably, the background is split into two shades of teal centered by a search function, and with its logo in the top left corner.

The Respondent is reportedly located in Viet Nam.

The disputed domain name was registered on March 26, 2024.

The disputed domain name resolves to a website that allegedly offers the same travel ticket services as the Complainant. On the associated website, the terms “onward tickets” are prominently used as an identifier, including in headings and in logo-style displays. The color scheme of the disputed domain name includes various shades of blue, green, yellow, and pink; notably, the background is split into two shades of teal centered by a search function – albeit the two colors are in the opposite arrangement as the Complainant’s site, and with its logo also in the top left corner.

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 overall design, including the color scheme of the website at the disputed domain name, creates a look and feel suggesting it is operated by the Complainant. This impression is supported by various text passages that are similar, and to some extent even identical with texts used on the Complainant’s website.

B. Respondent

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name. It argues that the term “onward ticket” is of descriptive character widely used across the travel industry. The Respondent further asserts that it operates a legitimate business in good faith, without having knowledge of the Complainant at the time of the disputed domain name registration. It is further argued that the content and design of the associated website was “generated independently using AI” and are “substantially different”. In addition, the Respondent denies any “attempt to impersonate” the Complainant. Rather, the Respondent argues that there is “no evidence of actual confusion”.

6. Discussion and Findings

According to paragraph 15(a) of the Rules, the Panel shall decide the Complaint in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

In accordance with paragraph 4(a) of the Policy, the Complainant must prove that each of the three following elements is satisfied:

- (i) the disputed domain name is identical or confusingly similar to a trademark 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.

It is noted that the Panel has taken note of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)") and, where appropriate, will decide consistently with the consensus views captured therein.

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 3.0](#), section 1.7.

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

The entirety of the ONWARD TICKET mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms or letters, here the letter "s", may bear on assessment of the second and third elements, the Panel finds such addition 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 name. The Respondent has not successfully 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.

In this regard, the Respondent's argument that the Complainant's mark is merely descriptive and lacks distinctiveness is in view of the Panel overtaken by other factors pointing to bad faith on the Respondent's part.

While the strength of a complainant's trademark may conceptually be a factor under the second element, the relevant question is whether the Respondent is making a bona fide descriptive use of the term or whether the term is being used in a trademark-targeting way. In cases involving dictionary or descriptive terms, panels often assess whether the Respondent's actual use of the disputed domain name corresponds to the term's generic or descriptive meaning, or whether the Respondent is instead seeking to capitalize on the Complainant's trademark rights. Where the Respondent's use is not genuinely descriptive and indicates an intention to trade on the Complainant's mark, panels typically find that the Respondent lacks rights or legitimate interests in the disputed domain name. [WIPO Overview 3.0](#), section 2.10.

In the present case, the Respondent is not using the disputed domain name or the corresponding term in a purely descriptive manner. Instead, the Respondent uses the term "Onward Tickets" as a trademark-like identifier. The website, to which the disputed domain name resolves, displays "Onward Tickets" in a prominent logo-like position at the top left of the webpage, functioning as a source indicator rather than as a descriptive reference to a type of service. This kind of use mirrors a typical presentation style in which commercial undertakings present their own trademarks online. This way of presentation, combined with the overall imitation of the Complainant's ONWARD TICKET branding and content, clearly exceeds any permissible descriptive use. In the Panel's view, this way of presentation forms part of a broader impersonation strategy by the Respondent aimed at suggesting that the website associated to the disputed domain name is operated by or affiliated with the Complainant. In view of the Panel, this demonstrates that the Respondent is targeting the Complainant's mark and seeking to create an association with the Complainant, rather than making a bona fide descriptive use of the term.

The Panel further notes the Respondent's assertion that the content and design of the associated website was "generated independently using AI". While the Panel acknowledges that such tools are increasingly used in website development and content creation, this does not absolve users from their responsibility to ensure that the AI-generated content does not violate third-party rights. Individuals and entities employing AI technology remain fully accountable for the output generated by such tools, including any potential infringement of trademark rights or other intellectual property. The fact that content may have been AI-generated does not provide a shield against liability where such content copies, imitates, or otherwise uses without authorization protected marks or materials. In the present case therefore, the Respondent cannot escape responsibility for the content on the website. The Respondent's website effectively replicates the Complainant's ONWARD TICKET branding and website look and feel, and – whether done through specific prompting (inspired by the Complainant's website) or not – the Respondent is responsible for the results. And the result is a site that creates consumer confusion through impersonation of the Complainant's services and branding.

Accordingly, 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 it inconceivable that the Respondent registered the disputed domain name without prior knowledge of the Complainant and its trademark. The composition of the disputed domain name, which directly corresponds to the Complainant's ONWARD TICKET mark, and its later use, makes accidental or coincidental registration highly unlikely. Given the Complainant's online presence and the nature of its services, the Panel concludes that the Respondent must have been aware of the Complainant at the time of registration and deliberately chose a domain name intended to target the Complainant's mark.

The way the Respondent is using the disputed domain name further confirms bad faith. The Respondent's website replicates essential elements of the Complainant's online presentation, including a strikingly similar design, color scheme, and overall layout, and even incorporates text passages that are in relevant parts copied verbatim from the Complainant's website. In the Panel's view, this conduct indicates an intent to mislead users into believing that the Respondent's website is operated by or associated with the Complainant, thereby taking unfair advantage of the Complainant's reputation in connection with its services provided under its ONWARD TICKET trademark. Such imitation and misleading presentation constitute compelling evidence of bad faith use under paragraph 4(b) of the Policy.

The Respondent's assertion that the content of its website was AI-generated does not alter the Panel's assessment. The alleged correspondence submitted by the Respondent is undated and appears self-serving, and in any event does not counter the presence of multiple text passages that reproduce substantial, copyright-protected parts of the Complainant's website, some of them almost verbatim and others even copied word-for-word. Bearing in mind the highly similar overall design, layout, and color scheme, it is the Panel's view that these copied elements – whether done manually or using AI – demonstrate a deliberate attempt to replicate the Complainant's online presentation. In any event, as noted under the second element above, while AI tools may legitimately be used in website development, end users remain accountable for ensuring that AI-generated content does not violate third-party rights as is the case here.

Overall, the Panel is convinced that the Respondent registered and is using the disputed domain name 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 name <onwardtickets.net> be transferred to the Complainant.

/Kaya Köklü/

Kaya Köklü

Sole Panelist

Date: December 4, 2025