

ADMINISTRATIVE PANEL DECISION

Project Management Institute, Inc. v. Qatar Construction Company
Case No. D2025-4712

1. The Parties

The Complainant is Project Management Institute, Inc., United States of America (“United States”), represented by Roche Pia LLC, United States.

The Respondent is Qatar Construction Company, India.

2. The Domain Name and Registrar

The disputed domain name <pmiindia.org> 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 November 13, 2025. On November 14, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 14, 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 18, 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 19, 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 20, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 10, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on December 12, 2025.

The Center appointed Gonçalo M. C. Da Cunha Ferreira as the sole panelist in this matter on December 22, 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, Project Management Institute, Inc. ("PMI"), is a non-profit corporation established in 1969 and is a global professional association in the field of project management.

The Complainant is the owner of registered trademark rights in the mark PMI, namely:

- United States Service Mark Registration No. 2,152,599, registered on April 21, 1998; and
- United States Service Mark Registration No. 4,077,281, registered on December 27, 2011.

Furthermore, the Complainant is the owner of the registered trademark rights in the mark PROJECT MANAGEMENT INSTITUTE, namely: United States Service Mark Registration No. 3,920,348, registered on February 15, 2011.

The Complainant operates a website at "www.pmi.org".

The disputed domain name <pmiindia.org> was registered on July 15, 2025.

According to the record, at least at the time of filing of the Complaint, the disputed domain name resolved to a website extensively using the Complainant's PMI name and trademarks.

The website purported to represent the Complainant's activities in India, reproduced the Complainant's institutional history, included copyright notices attributing the content to PMI, and imitated the layout and content of the Complainant's official India contact page.

The website further displayed contact details in India, including a physical address, telephone number and WhatsApp contact, and promoted alleged volunteer opportunities associated with PMI.

The contact information displayed on the website did not correspond to the registrant details disclosed by the Registrar.

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:

1. it is the owner of longstanding trademark registrations for the mark PMI.
2. the disputed domain name incorporates the PMI mark in its entirety, adding only the term "india".
3. the addition of a geographic descriptor does not prevent a finding of confusing similarity.
4. the use of the disputed domain name creates the impression of an official PMI presence in India.
5. the Respondent is not affiliated with the Complainant.
6. has never authorized the Respondent to use the PMI mark.
7. the Respondent is not commonly known by the disputed domain name.
8. the disputed domain name was used to impersonate the Complainant.

9. such use does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use.
10. the Respondent registered the disputed domain name with knowledge of the Complainant and its PMI marks.
11. the disputed domain name was used to intentionally attract Internet users by creating a likelihood of confusion.
12. the Respondent's conduct evidences impersonation and deception.

B. Respondent

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

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 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 entirety of the 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 the term "india" may bear on assessment of the second and third elements, the Panel finds the addition of such term 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 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.

There is no evidence of any authorization, license, or other relationship between the Parties. The Respondent used the disputed domain name to impersonate the Complainant, which can never confer rights or legitimate interests. [WIPO Overview 3.0](#), section 2.13.1. See *Project Management Institute, Inc. v. Project Management Professional, PIM*, WIPO Case No. [D2024-3737](#).

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 intentionally attempted to attract Internet users by creating a likelihood of confusion with the Complainant's trademark, which constitutes bad faith registration and use within the meaning of paragraph 4(b)(iv) of the Policy (see [WIPO Overview 3.0](#), section 3.2.1).

The Complainant's PMI trademark is well known worldwide in connection with project management education, certification, and professional standards, including in India. The incorporation of the Complainant's distinctive mark in its entirety, combined with the term "india", strongly suggests that the Respondent was aware of the Complainant and its rights at the time of registration of the disputed domain name. The Panel finds implausible any good-faith explanation for the Respondent's choice of the disputed domain name, which creates a clear association with the Complainant and conveys a false impression of an official or authorized Indian presence of the Complainant.

Furthermore, the disputed domain name resolves to a website that reinforces this misleading association, thereby intentionally attempting to attract Internet users by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the website. The Respondent's failure to submit any Response or to provide any evidence of actual or contemplated good-faith use further supports an inference of bad faith.

In light of the notoriety of the Complainant's mark, the composition and use of the disputed domain name, and the absence of any credible alternative explanation, the Panel concludes that the disputed domain name was registered and is being used in bad faith, in accordance with paragraph 4(a)(iii) of the Policy.

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 <pmiindia.org> be transferred to the Complainant.

/Gonçalo M. C. Da Cunha Ferreira/
Gonçalo M. C. Da Cunha Ferreira
Sole Panelist
Date: January 5, 2026