

ADMINISTRATIVE PANEL DECISION

Fédération Internationale de Football Association (FIFA) v. isaac rabinowitsch
Case No. D2025-4752

1. The Parties

The Complainant is Fédération Internationale de Football Association (FIFA), Switzerland, represented by K&L Gates, Australia.

The Respondent is isaac rabinowitsch, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <fifapackage.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 November 17, 2025. On November 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 17, 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 (Domains By Proxy, LLC / DomainsByProxy.com) 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 21, 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 25, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 15, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on December 16, 2025.

The Center appointed Jonathan Agmon as the sole panelist in this matter on December 26, 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 the world governing body of the sport of football and the organizer of major international football tournaments, including the FIFA World Cup, FIFA Women's World Cup, FIFA Club World Cup, and other international football tournaments, among others (the "Tournaments"). To fund and stage the Tournaments, the Complainant operates a worldwide commercial and licensing programme with FIFA Partners, sponsors, tournament supporters and official licensees. The Complainant reports that, for the 2019-2022 financial period, its revenue totaled USD 7.6 billion.

The Complainant owns numerous trademark registrations for FIFA around the world, including (among others) the following:

- International Registration No. 633108 for FIFA, registered on February 22, 1995;
- International Registration No. 747778 for FIFA, registered on June 2, 2000;
- United States Registration No. 2352934 for FIFA, registered on May 30, 2000;
- United States Registration No. 2661401 for FIFA, registered on December 17, 2002; and
- United States Registration No. 3878469 for FIFA, registered on November 23, 2010.

The Complainant operates its official website via the domain name <fifa.com>, which provides information relating to the Tournaments, the Complainant's official platforms and pages relating to, among other things, the Complainant's store, online streaming, official ticketing and hospitality offerings.

The disputed domain name was registered on April 25, 2025, and at the time of filing the Complaint, resolved to an inactive website displaying the Complainant's FIFA trademark together with the word "package" and the message "launching soon".

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 it holds extensive and long-standing rights in the trademark FIFA, which is globally famous and uniquely associated with the Complainant and its international football tournaments. These rights arise from decades of use, an extensive worldwide trademark portfolio dating back several decades, and consistent recognition in numerous prior UDRP decisions. The disputed domain name is confusingly similar to the Complainant's FIFA trademark since it incorporates the FIFA trademark in its entirety together with the descriptive term "package", which does not dispel confusion, and that, given established UDRP principles, the addition of descriptive or generic terms does not avoid confusing similarity.

Second, the Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent is not affiliated with, licensed by, or otherwise authorized by the Complainant to use the FIFA trademark. The disputed domain name resolves only to a “launching soon” page and is not used in connection with any bona fide offering of goods or services, nor for any legitimate non-commercial or fair use. The Respondent has never been commonly known by the disputed domain name and holds no trademark rights in FIFA or any similar designation. The Complainant further notes that the Respondent was previously found, in a recent UDRP decision, to have no rights or legitimate interests in an almost identical domain name incorporating the FIFA mark.

Third, the Complainant asserts that the disputed domain name was registered and is being used in bad faith. The Respondent registered the disputed domain name decades after the FIFA trademark became well known worldwide and with clear knowledge of the Complainant’s rights. The incorporation of the famous FIFA mark with a descriptive term commonly associated with ticketing and hospitality services suggests an intent to exploit the Complainant’s reputation and to create a likelihood of confusion as to source, sponsorship, or affiliation. The Complainant argues that the Respondent’s passive holding of the disputed domain name does not prevent a finding of bad faith, particularly in light of the fame of the FIFA mark and the Respondent’s prior conduct involving a nearly identical domain name that was found to have been used in bad faith to target the Complainant.

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 “package” 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.

In addition, the Respondent was recently involved in a domain name dispute with the Complainant, for a nearly identical domain name, where the UDRP panel decision found that the Respondent had no rights or legitimate interests in respect of a nearly identical domain name comprising the Complainant's FIFA trademark. The Respondent did not allege in this or the prior case that he has rights or legitimate interests in the FIFA trademark

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

In the present case, the Panel notes that the Respondent registered the disputed domain name many years after the Complainant registered its FIFA trademark. The FIFA trademark has been registered since at least 1994 and the record shows that the Complainant's FIFA trademark is well-known in connection with the Complainant's services. The Respondent failed to respond to the Complaint and rebut the Complainant's allegations that the Respondent was aware of the Complainant's FIFA trademark at the time of registration and the Panel draws the inference that the Respondent was aware of the FIFA mark when he registered the disputed domain name and was targeting the Complainant. The use of the terms "fifa" and "package" on the website associated with the disputed domain name supports the inference that the Respondent was aware of the Complainant's FIFA trademark at the time of registration and registered the disputed domain name with the intention of exploiting the Complainant's goodwill.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. In the present case, the disputed domain name resolves to an inactive website displaying the Complainant's FIFA trademark together with the word "package" and the message "launching soon". Having reviewed the available record, the Panel notes the distinctiveness or reputation of the Complainant's trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

In addition, the evidence shows that the Respondent previously used a nearly identical domain name to host a website which another panel confirmed was used to target the Complainant in bad faith (see *Fédération Internationale de Football Association (FIFA) v. isaac rabinowitsch*, WIPO Case No. [D2025-3774](#)). The domain name in that case resolved to a website which displayed the Complainant's trademarks, represented that it offered 'Official 2026 World Cup Packages', and offered for sale travel packages to attend the FIFA World Cup 2026. The panel's finding in that case that the respondent registered and used the

domain name in bad faith is instructive in the present proceedings and reinforces the conclusion that the Respondent was targeting the Complainant and its FIFA trademark.

Finally, the Respondent's failure to file a Response in these proceedings is also taken into account and further supports a finding of 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 <fifapackage.com> be transferred to the Complainant.

/Jonathan Agmon/

Jonathan Agmon

Sole Panelist

Date: January 9, 2026