

## ADMINISTRATIVE PANEL DECISION

G4S Limited v. Philipp Ifkovits

Case No. D2025-4806

### 1. The Parties

The Complainant is G4S Limited, United Kingdom, represented by SafeNames Ltd., United Kingdom.

The Respondent is Philipp Ifkovits, Austria.

### 2. The Domain Name and Registrar

The disputed domain name <g4s-austria.com> is registered with IONOS SE (the “Registrar”).

### 3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on November 19, 2025. On November 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 20, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 20, 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 in English on November 24, 2025.

On November 20, 2025, the Center informed the Parties in German and English, that the Language of the Registration Agreement for the disputed domain name is German. On November 24, 2025, the Complainant requested English to be the language of the proceeding. The Respondent did not submit any comment on the Complainant’s submission.

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 in German and English, and the proceedings commenced on December 8, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 28, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on December 30, 2025.

The Center appointed Andrea Jaeger-Lenz as the sole panelist in this matter on January 9, 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, headquartered in the United Kingdom, is a global security company which provides security and facility services in around 90 countries across the world and presently has a network of more than 800,000 employees globally (see Annex 4 to the Complaint). The services offered by the Complainant fall into the categories "Security Solutions", "Cash Solutions", "Consulting Services", "Care and Justice Services" and "G4S Academy" (Annex 6 to the Complaint); there are also country-specific services across different industry sectors. The Complainant has been operating under the G4S brand for over 20 years and has acquired trademark rights in the G4S designation worldwide. Among the trademarks owned by the Complainant (as per Annex 7 to the Complaint) are the following:

- International trademark No. 885912 G4S (word), registered on October 11, 2005 for goods and services in Classes 1, 5, 6, 9, 16, 35, 36, 37, 38, 39, 41, 42, 44 and 45, with designations to numerous countries around the world including Australia, Singapore, Türkiye, China, Egypt and others.
- United States of America trademark No. 3378800 G4S (word), registered on February 5, 2008 for goods and services in Classes 9, 39 and 45;
- European Union trademark No. 015263064 G4S (word), registered on September 20, 2016, for goods and services in Classes 6, 36 and 37.

The Complainant uses its domain name <g4s.com>, registered since December 1, 1999, for its main website to market its global offerings including country-specific pages to offer its tailored services to users in many countries including in Austria (as per Annex 8 to the Complaint). Besides that, the Complainant has registered domain names including its G4S trademark under various country-code top level domains ("ccTLDs"), such as <g4s.cz> or <g4s.at>.

The disputed domain name was registered on September 27, 2025. Before the filing of the Complaint the disputed domain name redirected the Complainant's own website, specifically to the URL "<https://www.g4s.com/de>"-at (as per Annex 10 to the Complaint). Further, MX records have been created for the disputed domain name (as per Annex 14 to the Complaint).

#### **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 owns multiple trademarks for the term G4S in various jurisdictions. The Complainant holds the G4S trademark to be distinctive, highlights the alleged goodwill and recognition generated under this trademark and stresses that earlier UDRP panels have recognized the Complainant's goodwill and reputation in the G4S mark. Further, the disputed domain name is, according to the

Complainant, confusingly similar to the Complainant's trademark, as it reproduces the G4S mark in its entirety, separated from the otherwise meaningless country designation "Austria" by a hyphen. Accordingly, this addition does not dispel the confusing similarity between the disputed domain name and the Complainant's trademark, considering also that the generic Top-Level Domain (gTLD) ".com" has to be disregarded as a standard registration requirement.

On the second element, the Complainant submits that the Respondent lacks a right or legitimate interest in the disputed domain name. To the best of the Complainant's knowledge, the Respondent does not own any trademark or related rights in the term G4S, nor has he obtained a license from the Complainant to use the term G4S. Also, in the Complainant's view, none of the circumstances listed in paragraph 4(c) of the Policy are applicable to the present case. The fact that the disputed domain name was used to redirect to the Complainant's website shows targeting of the Complainant and the intention of the Respondent to create confusion among Internet users as to the affiliation of the disputed domain name with the Complainant, which use cannot be considered a bona fide offering under the Policy. In addition, the Respondent has never been known by the Complainant's trademark or the disputed domain name, there is no known generic or common usage of the G4S term nor any other evidence that the Respondent did not intend the disputed domain name in any other way but targeting the Complainant.

On the third element, the Complainant claims that the disputed domain name was registered and is being used in bad faith. On registration in bad faith, the Complainant points to the fact that its trademarks predate the creation of the disputed domain name. These registrations are readily available on the Internet, and any popular search engines list the Complainant as first results when conducting a search for the term. The G4S term is a distinctive term, with the only addition being the geographical term "austria", so that the composition of the disputed domain name shows that the Respondent had knowledge of the Complainant and its Austrian operations. All in all, it is, according to the Complainant, inconceivable that the Respondent registered the disputed domain name without knowledge of the Complainant and its mark. On use in bad faith, the Complainant asserts that the Respondent has intentionally attempted to attract, for commercial gain, user to its website or other online location by creating a likelihood of confusion with the Complainant's mark, given that the disputed domain name was used to redirect to the Complainant's own website. By such use, the Respondent retains control over the Complainant's Internet traffic and creates confusion as to affiliation or sponsorship of the disputed domain name and the Complainant. There is little other explanation for such behaviour but that the Respondent intended to generate commercial gain through website traffic intended for the Complainant's website. All the more, the activation of MX records for the disputed domain name shows that emails may have been sent or intended to be sent to unsuspecting Internet users using the disputed domain name to imply association with the Complainant. In addition, the Complainant points to the Respondent not having replied to the Complainant's cease and desist letter (as per Annex 13 to the Complaint), which is taken to be further evidence of bad faith.

## **B. Respondent**

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

## **6. Discussion and Findings**

### **A. Language of the Proceeding**

The language of the Registration Agreement for the disputed domain name is German. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including the fact that the Respondent used the English translation "Austria" as opposed to the German equivalent "Österreich" and that the Complainant as well as its representative are

domiciled in the United Kingdom. Further, requiring a translation would result in the Complainant having to incur additional expenses and cause unnecessary delay.

The Respondent did not comment on or make any specific submissions with respect to the language of the proceeding.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to determine this issue judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs (see WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.5.1).

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English. First of all, the registration of the disputed domain name, namely using the English term for "Österreich" which is "Austria" within the disputed domain name, shows that the Respondent understands English, which, apart from this, is the most widely understood language in the world. Secondly, the Respondent has been given the opportunity to respond to the Complaint and, specifically, to object to proceedings being conducted in English. It chose not to respond and thereby did not object to English as language of proceedings. Against this background, conducting the proceedings in English rather than requesting the Complainant to additionally present the Complaint and Annexes in German does not appear unfair to the Respondent and is in the interest of due expedition of proceedings.

## **B. 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 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 other terms here, "austria", 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.

## **C. 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.

Panels have held that the use of a domain name for illegitimate activity here, claimed impersonation, 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.

#### **D. 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 notes that the Complainant disposes of country specific operations including for Austria and that the Respondent has registered the disputed domain name comprising the Complainant's G4S mark in its entirety, with the addition of the geographic term "austria". The disputed domain name was used to redirect to the Complainant's own website under "www.g4s.com", and MX records were created for the disputed domain name.

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, given the inherent distinctiveness of the Complainant's trademark and the use to which the disputed domain name has been put, there is no conceivable other reason for its registration but that the Respondent intended to target the Complainant's trademark and impersonate the Complainant with regard to its Austrian activities.

Panels have held that the use of a domain name for illegitimate activity here, claimed impersonation, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under 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 <g4s-austria.com> be transferred to the Complainant.

/Andrea Jaeger-Lenz/

**Andrea Jaeger-Lenz**

Sole Panelist

Date: January 23, 2026