

## **ADMINISTRATIVE PANEL DECISION**

Ares Management LLC v. zhang honglin  
Case No. D2025-5043

### **1. The Parties**

The Complainant is Ares Management LLC, United States of America (“US” or “United States”), represented by Greenberg Traurig, LLP, United States.

The Respondent is zhang honglin, Thailand.

### **2. The Domain Name and Registrar**

The disputed domain name <aresmanagementcorporationi.com> is registered with Gname.com Pte. Ltd. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 4, 2025. On December 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 5, 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 December 5, 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 December 9, 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 December 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 30, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 2, 2025.

The Center appointed Eva Fiammenghi as the sole panelist in this matter on January 7, 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, Ares Management LLC, is a US company operating in the financial services sector, specifically in alternative asset management. Founded in 1997, it is a subsidiary of Ares Management Corporation, a publicly traded company listed on the New York Stock Exchange under the ticker symbol "ARES." The group manages approximately USD 596 billion in assets and provides investment services in credit, private equity, and real estate, with over 4,200 employees and more than 55 offices worldwide.

The Complainant owns multiple registrations for the ARES trademark in numerous jurisdictions worldwide, including but not limited to the following:

- United States Trademark ARES, Reg. No. 3014171, registered on November 8, 2005, in class 36.
- United States Trademark ARES MANAGEMENT, Reg. No. 3925366, registered on March 1, 2011, in class 36.
- United States Trademark ARES CAPITAL MANAGEMENT, Reg. No. 3925365, registered on March 1, 2011, in class 36. (together Complainant's trademarks ARES)

The Complainant operates its principal website at "www.aresmgmt.com", used worldwide to promote its investment management services. The Complainant also owns other related domain names, including <aresmanagement.com>, <aresmanagementrealestate.com>, and <arescapitalmgmt.com>.

The disputed domain name <aresmanagementcorporationi.com> was registered on October 20, 2025 with the registrar Gname.com Pte. Ltd. The disputed domain name currently does not resolve to any active website content (passive holding). However, MX records have been configured for email services, suggesting potential fraudulent use such as phishing.

#### **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 disputed domain name <aresmanagementcorporationi.com> is confusingly similar to its well-known trademark ARES. According to the Complainant, the disputed domain name reproduces its trademark in its entirety, merely adding the descriptive terms "management" and "corporationi," which are closely associated with the Complainant's corporate name and business. These additions do not prevent a finding of confusing similarity under the Policy.

The Complainant further asserts that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent is not affiliated with the Complainant, has never been authorized to use its trademark, and is not commonly known by the disputed domain name. There is no evidence of any bona fide offering of goods or services or legitimate non-commercial use.

The Complainant submits that the disputed domain name was registered and is being used in bad faith. The registration occurred in October 2025, long after the Complainant's trademarks became internationally recognized. While the disputed domain name does not resolve to an active website, DNS records show active MX entries, indicating that the disputed domain name is configured for email services. The Complainant argues that this strongly suggests an intent to use the disputed domain name for fraudulent

purposes, such as phishing or impersonation, by exploiting the similarity to the Complainant's trademark. In the Complainant's view, these circumstances demonstrate bad faith under paragraph 4(b)(iv) of the Policy.

On this basis, the Complainant requests that the Panel order the transfer of the disputed domain name to the Complainant.

## **B. Respondent**

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

## **6. Discussion and Findings**

Under paragraph 4(a) of the Policy, to succeed a complainant must prove that:

- (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 was registered and is being used in bad faith.

These elements are discussed in turn below. In considering these elements, paragraph 15(a) of the Rules provides that the Panel shall decide the Complaint on the basis of statements and documents submitted and in accordance with the Policy, the Rules and any other rules or principles of law that the Panel deems applicable.

### **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 Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. The disputed domain name incorporates the Complainant's trademarks ARES in its entirety, with the addition of the descriptive terms "management" and "corporationi." These additions do not prevent a finding of confusing similarity. [WIPO Overview 3.0](#), section 1.8.

The applicable generic Top-Level Domain (".com") is typically disregarded under the first element assessment. [WIPO Overview 3.0](#), section 1.11.

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.

The Complainant has not authorized the Respondent to use its trademark. There is no evidence that the Respondent is commonly known by the disputed domain name, nor is there evidence of any bona fide offering of goods or services, or legitimate noncommercial use. On the contrary, the disputed domain name does not resolve to an active website, and DNS records show active MX entries, suggesting potential use for fraudulent email activities

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 notes that the Respondent registered the disputed domain name in October 2025, many years after the Complainant's trademarks ARES were registered. The disputed domain name incorporates the Complainant's trademark in its entirety, with the addition of descriptive terms "management" and "corporationi," which strongly suggests that the Respondent was aware of the Complainant and its rights at the time of registration.

The disputed domain name does not resolve to an active website, as confirmed by the evidence provided, but DNS records show active MX entries, indicating that the disputed domain name is configured for email services and might be used for illegitimate activity. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

Panels have also found that the non-use of a domain name does not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. In this case, the distinctiveness and reputation of the Complainant's trademark, combined with the composition of the disputed domain name and the presence of MX records, reinforce the 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 <aresmanagementcorporationi.com> be transferred to the Complainant.

*/Eva Fiammenghi/*

**Eva Fiammenghi**

Sole Panelist

Date: January 20, 2026