ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Brad Smotherman v. Vinay Parmar
Case No. D2025-5216

1. The Parties

The Complainant is Brad Smotherman, United States of America ("United States"), represented by Lewis & Lin, LLC, United States.

The Respondent is Vinay Parmar, India.

2. The Domain Name and Registrar

The disputed domain name <therealbradsmotherman.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 December 13, 2025. On December 15, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 15, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 16, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint.

The Center verified that the 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 January 6, 2026. In accordance with the Rules, paragraph 5, the due date for Response was January 26, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on January 27, 2026.

The Center appointed Andrew D. S. Lothian as the sole panelist in this matter on January 30, 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 is an entrepreneur and real estate investor. It claims unregistered trademark rights in its personal name based upon its commercial activities under such name as a businessman, investor, speaker, writer and podcaster since 2010. The Complainant says that its products and services are offered primarily in the field of real estate, namely investing, training, books, and podcasts.

The majority of the Complainant's evidence in support of its claim to unregistered trademark rights consists of its formal declaration of December 12, 2025, under penalty of perjury, in which it declares, inter alia, the following:

- It owns the domain name <bradsmotherman.com> and uses this and its personal name to market its services. The Panel notes in passing that the said domain name was registered on May 10, 2018;

- It spends roughly USD 70,000 per month on advertising and marketing services under the BRAD SMOTHERMAN mark and has done so since 2018;

- It promotes its claimed mark on various social media accounts including "YouTube", "Facebook", "TikTok", "Instagram", and others, whereby it has amassed 25,000 followers;

- It is the host of a widely distributed podcast with over 150 episodes and thousands of subscribers named "Investor Creator with Brad Smotherman", which is available on all major streaming platforms, and of which there have been over 500,000 views in total; and

- It has received media recognition under said mark in publications such as Yahoo Finance, Nasdaq.com, Fox News, and Inman News. The Panel notes in passing that copies of these publications showing such alleged recognition were not produced, but that they were averred to under oath.

The Complainant produces a screenshot of its said podcast on the "Apple Podcasts" official platform showing some 159 podcast episodes whereby the term "Brad Smotherman" is featured prominently both in the title and in the listing as creator of the podcasts. The listing also contains a copyright notice dated 2015, a "Years Active" designation of "2019 – 2025", and a rating of 4.9 out of 5 based upon 148 ratings.

The disputed domain name was registered on August 26, 2025. Little is known about the Respondent, which has not participated in the administrative proceeding, other than that it appears to be a private individual with an address in India. The website associated with the disputed domain name contains the title "Brad Smotherman – No Banks, No Limits, Just Victims". The text below the title appears to be an article by a person named "Michael Johnson" about the Complainant that makes various claims about the Complainant's business empire and reputation which cast these and the Complainant itself in an unfavorable light.

The Complainant states (without additional evidence) that it believes that the Respondent is a defendant in a pending legal dispute with it before a Federal District Court in the United States and that the Respondent's intent is to falsely pose as "Michael Johnson" in order to attract and redirect potential customers seeking its services or information about it.

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 BRAD SMOTHERMAN name and trademark have become recognizable, well known and distinctive within the real estate investing industry as a result of the Complainant's continuous and substantial use, advertising, and promotion, adding that such name is not a common name. The Complainant notes that a review of the first five pages of Google search results for "Brad Smotherman" all refer to the Complainant (evidence provided, although the Panel notes that by page five, one or two results unrelated to the Complainant appear). The Complainant asserts that said name has acquired distinctiveness and secondary meaning under the laws of the United States, and that it satisfies the threshold requirement of having trademark rights in the Complainant's personal name for the purposes of the Policy.

The Complainant asserts that the Respondent is using the disputed domain name to target the Complainant, adding that this fact is further evidence of the distinctiveness of the claimed mark.

The Complainant notes that the disputed domain name contains the Complainant's BRAD SMOTHERMAN mark in its entirety and adds the expression "the real", which the Complainant states falsely suggests an association with the Complainant, and reinforces confusing similarity.

The Complainant contends that the Respondent cannot establish rights or legitimate interests in the disputed domain name because it was not commonly known by the disputed domain name, was not authorized or licensed by the Complainant to use its name and trademark in the disputed domain name, has not used the disputed domain name in connection with a bona fide offering of goods or services, and has not made legitimate noncommercial or fair use of the disputed domain name. The Complainant notes that the disputed domain name and the content on the associated website refer directly to the Complainant and incorporate the Complainant's unregistered mark in its entirety, adding that the overwhelming majority of panels under the Policy have held that the adoption of a trademark in this manner is not a legitimate use. The Complainant adds that while it is well established that the Respondent may have the right to operate a gripe site to express its own views, it does not have the right to infringe on another's mark in doing so or to misleadingly divert the Complainant's customers and to tarnish and damage the Complainant's trademark.

The Complainant asserts that bad faith registration and use may be inferred where the Respondent has failed to show rights or legitimate interests in the disputed domain name, adding that the Respondent deliberately targeted the Complainant's mark and diverted Internet users seeking information about the Complainant and its business to the Respondent's website. The Complainant adds that the Respondent's purpose is solely to create a likelihood of confusion with the Complainant's and mark, and to mislead, deceive and divert consumers to its website in order to attempt to gain unfair advantage over the Complainant in a pending federal lawsuit by damaging the Complainant's reputation.

The Complainant contends that the Respondent's intentional tarnishment of the Complainant's mark may constitute evidence of registration and use in bad faith, noting also that the Respondent can reasonably be charged with knowledge of the Complainant's mark, particularly given it uses an image of the Complainant and refers to the Complainant in website text. The Complainant adds that the Respondent is intentionally holding itself out as the Complainant to lure Internet users to its site in bad faith. The Complainant submits that the disputed domain name incorporates the Complainant's mark without a substantive modifier in an act of deception which will damage the Complainant and expand the group of users who will read the Respondent's criticism of the Complainant. The Complainant asserts that the said website amounts to an impersonation of its mark for such purpose.

The Complainant adds that this not a case of genuine, noncommercial criticism but rather is primarily a pretext to tarnish and damage the Complainant for the Respondent's commercial advantage, which constitutes bad faith. Finally, the Complainant notes that the registration record for the disputed domain name included a privacy service, adding that although use of such a service alone is not sufficient, this may demonstrate bad faith in the overall context of the case.

B. Respondent

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

6. Discussion and Findings

6.1. Preliminary issue: Identity of the Respondent

Paragraph 1 of the Rules defines the Respondent as "the holder of a domain-name registration against which a complaint is initiated". The Panel nevertheless has discretion to substitute or join another entity as a respondent by way of its general powers as set out in paragraph 10(a) of the Rules.

In the Complaint, the Complainant originally listed the Respondent as "Domains By Proxy, LLC". The Respondent's name and contact details were subsequently provided by the Registrar in response to the Center's verification request. As is noted in section 4.4.1 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.0"), as a matter of panel-endorsed practice, in such cases, further to its compliance review and case notification responsibilities, the Center will (a) provide any disclosed underlying registrant information to the complainant, and (b) invite the complainant to amend the complaint to reflect such information. The Center did this in the present case, on December 16, 2025, but the Complainant failed to affirmatively reply to the Center's invitation to amend the Complaint to reflect the registrant information provided by the Registrar. Section 4.4.1 of the WIPO Overview 3.0 goes on to note that, if the complainant chooses not to amend its complaint, the Center would not normally treat this as a complaint deficiency, although noting that complainants do tend to amend their complaints to reflect any disclosed underlying registrant information, in particular to avoid raising possible decision enforcement questions by the registrar.

Here, the fact that the Complainant did not amend the Complaint, at least to reflect the contact details of the registrant as provided by the Registrar, could potentially give rise to enforcement questions; if ever (having been raised to its attention), those would be a matter for the Complainant to manage. Section 4.4.5 of the WIPO Overview 3.0 notes however, that in all cases involving a privacy or proxy service and irrespective of the disclosure of any underlying registrant, the appointed panel retains discretion to determine the respondent against which the case should proceed.

The Panel notes that the holder of the disputed domain name has been revealed by the Registrar and is satisfied that this person is the underlying registrant of the disputed domain name, and that the Complaint was appropriately notified to that person. In these circumstances, the Panel is content to substitute the named registrant of the disputed domain name per the information provided by the Registrar as the Respondent in the present case, which may facilitate the Registrar's implementation of any order for transfer of the disputed domain name in the event of the Complainant's success in the administrative proceeding.

6.2 Substantive Issues

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 asserts that it has UDRP-relevant rights in its personal name. Personal names that have been registered as trademarks would provide standing for a complainant to file a UDRP case. WIPO Overview 3.0, section 1.5.1. The Complainant does not however have a registered trademark in its personal name and instead asserts that it possesses corresponding unregistered trademark rights. In situations where a personal name is being used as a trademark-like identifier in trade or commerce, the Complainant may be able to establish unregistered trademark rights in that name for purposes of standing to file a UDRP case where the name in question is used in commerce as a distinctive identifier of the Complainant's goods or services. WIPO Overview 3.0, section 1.5.2. Such acquired distinctiveness could be shown by way of relevant evidence such as, for example, (i) the duration and nature of use of the mark, (ii) the amount of sales under the mark, (iii) the nature and extent of advertising using the mark, (iv) the degree of actual public (e.g., consumer, industry, media) recognition, and (v) consumer surveys. WIPO Overview 3.0, section 1.3.

However, merely having a famous name (such as a businessperson or cultural leader who has not demonstrated use of their personal name in a trademark/source-identifying sense), or making broad unsupported assertions regarding the use of such name in trade or commerce, would not likely demonstrate unregistered or common law rights for purposes of standing to file a UDRP complaint. WIPO Overview 3.0, section 1.5.2.

As the panel noted in the recent case of *Kenes Rakishev v. Felix Sater, Regency Capital Group*, WIPO Case No. D2025-1072, "Sections 1.5 and 1.3 of the WIPO Overview 3.0 reflect the consensus view of many panelists expressed in numerous decisions issued under the Policy. The basis of this consensus stems from the nature of trademarks – they are signs that are capable of distinguishing the goods or services offered by one undertaking from the goods or services offered by other undertakings, so there is always a connection between such sign and specific goods or services. If a personal name is not being used to identify particular goods or services offered on the market, this name would not operate as a trademark and there would be no specific goods or services that the public would associate with it."

Here, the evidence demonstrates to the Panel's satisfaction that the Complainant is using its personal name as a sign that is capable of distinguishing the goods or services offered by it from the goods or services offered by other undertakings, whereby there is a connection between such sign and specific goods or services, in this case, the Complainant's podcasts. The Panel has no specific evidence that such podcasts are commercialized but the general tenor of the Complainant's formal declaration indicates that this must be the case, bearing in mind the Complainant's description of "thousands of subscribers", which the Panel presumes means paid subscriptions or at least the sale of advertisements that is linked to subscriber numbers. In addition, the Panel notes the Complainant's declaration that it spends roughly USD 70,000 per month on advertising and marketing services related to the claimed mark. While the Panel would have preferred to see specific evidence regarding these matters rather than the Complainant relying on its said declaration, the Panel accepts that the declaration was accompanied at least one example of the Complainant's activities, notably the screenshot of the Complainant's page on "Apple Podcasts", whereby the Panel considers that it has sufficient evidence before it to corroborate the Complainant's said declaration.

The Panel notes the Complainant's claimed existence of some 25,000 followers on social media and recalls the recent case of *Axel Sylvian van den Braken v. Domain Administrator, afterTHOUGHT, Inc*, WIPO Case No. D2025-4698, in which a complainant asserted that it had 2.1 million followers on "Instagram" and 321,000 followers on "Facebook" in support of its claim to unregistered trademark rights. The panel in that case found that a large social media following by itself does not equate to trademark rights, adding that the complainant's social media metrics were not tied to substantiated marketplace activity. The Panel in the present case considers on this topic that, while not parting company with the panel in *Axel Sylvian van den Braken v. Domain Administrator, afterTHOUGHT, Inc*, *supra*, follower counts are a convenient and evidentially useful indication of the potential (arguably, the minimum) audience to which a person or business may have recourse for the promotion, marketing, distribution or sale of goods or services, whereby they can form part of the factual matrix on this topic that should not be overlooked by a panel under the Policy.

Here, the Panel considers that the Complainant's social media following supports its claim to unregistered trademark rights specifically because this following is tied to (and is part of) its marketplace activity, not least in the promotion of the Complainant's podcasts to its audience and, for example, its likely economic activity on platforms such as YouTube on which it also notes that it promotes its goods and services. Indeed, social media is likely to be one of the most important channels for the Complainant's commercial activity, if not the most important channel apart from the various streaming platforms which host its podcasts. In all of these circumstances, the Panel finds that the Complainant has established on the basis of the present record that it possesses unregistered trademark rights in the mark BRAD SMOTHERMAN, noting also that no counterargument was made by the Respondent (see also WIPO Overview 3.0 section 1.15).

The Panel finds the Complainant has established unregistered trademark or service mark rights for the purposes of the Policy. WIPO Overview 3.0, section 1.3.

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, "thereal", may bear on assessment of the second and third elements, the Panel finds the addition of such term or terms 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 applicable Top-Level Domain ("TLD") in a domain name (here ".com"), is viewed as a standard registration requirement and as such may be disregarded under the first element confusing similarity test. WIPO Overview 3.0, section 1.11.1. Likewise, the absence of a space in the disputed domain name is of no consequence as spaces are not permitted in domain names for technical reasons.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests and Registered and Used in Bad Faith

The website associated with the disputed domain name contains what appears to be noncommercial criticism of the Complainant. There is accordingly a prospect of the Respondent establishing that it has rights and legitimate interests regarding the disputed domain name on the basis of paragraph 4(c)(iii) of the Policy, namely that the Respondent is making a legitimate noncommercial or fair use thereof, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue, albeit that no Response has been received making such an assertion.

If the Respondent is found to be making such a legitimate noncommercial or fair use, it would follow that the disputed domain name would not have been registered and used in bad faith. On the other hand, if the Panel were to find that the said website were pretextual, for example, because the apparent exercise of free speech is a mere pretext for an underlying attempt to gain an unfair commercial advantage, it would follow that the Respondent would not be able to establish rights and legitimate interests in terms of paragraph 4(c)(iii) of the Policy and likewise that the disputed domain name had been registered and used in bad faith. Consequently, it may be seen that in these circumstances the second and third elements of the Policy are linked and the Panel therefore considers that it is appropriate for it to consider the second and third element of the Policy together.

The first question for the Panel on this topic is whether the website associated with the disputed domain name is genuine and noncommercial. WIPO Overview 3.0, section 2.6.1. As far as the genuineness of the criticism is concerned, the Panel is not assessing whether it is true, reasonable, or justified but rather whether the views are apparently held by the Respondent on a genuine basis and not merely a pretext for cybersquatting (see, for example, the discussion in *Gil Negrete v. Mustafa Derahovic*, WIPO Case No. D2025-2775). Here, there is no indication of any commercial activity on the corresponding screenshot of the website associated with the disputed domain name produced by the Complainant. The Complainant indicates that the Respondent may be involved in court proceedings with the Complainant but no details of

any such action or the Respondent's part in it were provided to the Panel. There is no evidence before the Panel that the Respondent's views are not genuinely held, or, for example, that its real purpose is to gain an unfair commercial advantage in respect of the Complainant's mark.

This leaves the Panel with an assessment under the Policy as to whether the Respondent is entitled to register and use the disputed domain name, which incorporates the Complainant's unregistered mark plus the term "the real", for the purposes of a criticism site. The way in which panels under the Policy have approached this question has evolved since the Policy's earliest days (see, for example, the contours of a specific approach applied by some panels relating to parties exclusively from the United States described in section 2.6.2 of the WIPO Overview 3.0). Rather than recount the history in any detail, the Panel notes that it agrees fully with the recent assessment of the panel in the case of *Gil Negrete v. Mustafa Derahovic*, *supra*, which contains a comprehensive review of this approach, and, as far as the present Panel is concerned, describes where matters currently stand. This is the approach that the Panel will take in the present case as described further below.

It is generally accepted by panels under the Policy that domain names identical to a complainant's trademark carry a high risk of implied affiliation, and that if a domain name consists of a trademark plus an additional term such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. Certain additional terms may or may not trigger an inference of affiliation, and would normally require a further examination by the panel of the broader facts and circumstances of the case – particularly including the associated website content – to assess potential respondent rights or legitimate interests. WIPO Overview 3.0, section 2.5.1.

Panels under the Policy also typically find that even a general right to legitimate criticism does not necessarily extend to registering or using a domain name identical to a trademark (i.e., <trademark.tld> (including typos)); even where such a domain name is used in relation to genuine noncommercial free speech, panels tend to find that this creates an impermissible risk of user confusion through impersonation. WIPO Overview 3.0, section 2.6.2.

Where the domain name is not identical to the complainant's trademark, but it comprises the mark plus a derogatory term (e.g., <trademarksucks.tld>), panels tend to find that the respondent has a legitimate interest in using the trademark as part of the domain name of a criticism site if such use is prima facie noncommercial, genuinely fair, and not misleading or false. WIPO Overview 3.0, section 2.6.3.

It will therefore be apparent that the parameter for any fairness test in the case of a criticism site extends from domain names that obviously signal the likely presence of criticism by inclusion of a derogatory term, on the one hand, to domain names identical to a trademark with no additional terms, which panels typically consider amounts to impersonation, on the other. At one extreme, the domain name is likely to be fair and at the other, unfair.

There are cases that are "in between" the two extremes, and the present case is such an example. The Complainant's mark is reproduced in its entirety coupled with additional terms. This means that the Panel must consider whether it needs to look only at the disputed domain name to determine whether it triggers an inference of affiliation or whether it is necessary to example the broader facts and circumstances, including the website content. It may also consider whether the composition of the disputed domain name with its additional term(s) cannot constitute fair use and is determinative of the matter because the disputed domain name effectively impersonates or suggests sponsorship or endorsement by the trademark owner.

Here, the additional words "the real" (split into its word elements by the Panel for convenience) may or may not signal the presence of criticism. The disputed domain name, to the Panel's eyes, could be meant ironically or to draw contrast (as to which, see below), but in any event is not anywhere close to the "<trademarksucks.tld>" end of the parameter. On the contrary, the Panel considers that these words signal a strong affiliation to the trademark owner, placing them much closer to what might be termed the "impersonation" end of the spectrum. The Panel is aware that many prominent people used the qualifications "real" or "the real" with their personal names in order to denote an "official" status for their

social media accounts and to distinguish them from others, usually less prominent people, of the same or a similar name. Indeed, the Panel is aware that the complainant in *Donald J. Trump v. Fountainhead Entertainment LLC*, WIPO Case No. D2004-0429 (also the complainant in various other cases under the Policy) who has enjoyed global fame in connection with his personal name continues to use the term "real" in connection with a social media presence even in the age of verified accounts.

Whether or not the words "the real" are seen in the sense previously used in social media, it seems to the Panel that they work in the disputed domain name together with the Complainant's mark to falsely state to the Internet user that the disputed domain name is operated by the Complainant and not by a third party, and that it is most probably an "official" website of the Complainant that will be found there. In other words, the composition effectively intends to impersonate or suggest sponsorship or endorsement by the trademark owner. This contrasts markedly with the additional terms described in *Gil Negrete v. Mustafa Derahovic*, *supra*, which were the words "who is", in the domain name <whoisgilnegrete.com>. There, the panel saw the domain name concerned as most likely being read as comprising a question that "does not inherently indicate the position one way or the other". However, here, "the real [personal name/trademark]" is a statement, and in the Panel's view that statement contains a one-way indication, namely that "the real", i.e., the actual named person, operates both disputed domain name and associated website.

The Respondent has not engaged with the administrative proceeding, and consequently, unlike the panel in *Gil Negrete v. Mustafa Derahovic*, *supra*, the Panel has no explanation from the Respondent regarding the composition of the disputed domain name, and in particular, its choice of terms additional to the Complainant's mark. It has not escaped the Panel's attention that the Respondent might have argued that it chose these terms to convey the sense that it seeks to describe "the real" Brad Smotherman on the website associated with the disputed domain name, in the sense that the Respondent is setting out what it sees as the Complainant's "true colors". However, that is pure speculation on the Panel's part, and, in the Panel's opinion, it is not the way in which the disputed domain name would be read by the majority of Internet users. The Panel considers that the Respondent is likely to have known this when it registered it. The Panel therefore finds that by registering and using the disputed domain name, the Respondent intended to cloak itself in the Complainant's identity to maximize the dissemination of its criticism through impersonating the Complainant and that this use could not be regarded as fair or in good faith under the Policy in all the circumstances of the case.

Accordingly, although the disputed domain name does contain "additional terms" to a trademark in the sense of WIPO Overview 3.0, section 2.5.1, the Panel considers that, in this particular case, those terms serve to reinforce the impression that the registrant of the disputed domain name and operator of the associated website is the owner of the Complainant's trademark. As a result, the disputed domain name "effectively impersonates or suggests sponsorship or endorsement by the trademark owner" as described in section 2.5.1 and likewise creates "an impermissible risk of user confusion through impersonation" in the sense of WIPO Overview 3.0, section 2.6.2. In these circumstances, the Panel finds that the Respondent is not in a position to establish rights and legitimate interests in the disputed domain name and that the disputed domain name, which targets the Complainant and its trademark by impersonation, was registered and is being used in bad faith.

For completeness, the Panel notes that the Policy does not seek to prevent registrants such as the Respondent from using domain names for the purpose of making genuine noncommercial criticism, so long as such domain names make clear that the registrant is not affiliated with or authorized by the trademark holder concerned. This Panel has previously noted (see *SwissCare Europe v. michael click, Active OutDoors LLC*, WIPO Case No. D2022-1496) that it cannot be regarded as fair within the meaning of the Policy for a respondent to incorporate a trademark into a domain name with a view to deceiving Internet users intending to visit an official website of the trademark owner into viewing critical material which they are not looking for.

The analogy that the Panel favors is that the use of such a domain name is not the equivalent of standing outside the trademark owner's premises with a placard containing an expression of criticism and exercising one's right of free speech; rather, it amounts to constructing a confusingly similar entrance to the trademark

owner's premises and lying in wait for an audience of visitors who do not necessarily wish to be there and who are simply looking for the correct way into the Complainant's office.

The Panel finds that the second and third elements of the Policy have been established.

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 <therealbradsmotherman.com> be transferred to the Complainant.

/Andrew D. S. Lothian/
Andrew D. S. Lothian
Sole Panelist
Date: February 13, 2026