

ADMINISTRATIVE PANEL DECISION

Genesis Biosciences LLC and CKM Holdings Inc. v. Mike Clark,
Genesis BioScience Research LLC
Case No. D2026-0634

1. The Parties

The Complainants are Genesis Biosciences LLC, and CKM Holdings Inc., United States of America ("United States") represented by Michelmores LLP, United Kingdom.

The Respondent is Mike Clark, Genesis BioScience Research LLC, United States.

2. The Domain Name and Registrar

The disputed domain name <genesis-biosciences.com> is registered with Squarespace Domains II LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 13, 2026. On February 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 17, 2026, 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, Genesis BioScience Research LLC) and contact information in the Complaint. The Center sent an email communication to the Complainants on February 17, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainants to submit an amendment to the Complaint. The Complainants filed an amended Complaint on February 18, 2026.

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 March 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 1, 2026. The Respondent sent an email communication to the Center on April 9, 2026. The Center commenced the panel appointment process the same day.

The Center appointed William F. Hamilton as the sole panelist in this matter on April 10, 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 Complainants are a global biosciences company headquartered in Lawrenceville, Georgia, United States, specializing in biotechnology research, microbial and antimicrobial product development, and environmentally responsible manufacturing. The parent and trademark holding company of the Complainant Genesis Biosciences LLC, CKM Holdings Inc., holds the following registered trademarks for GENESIS BIOSCIENCES:

- United Kingdom Registration No. UK00908269698, filed April 30, 2009, registered February 22, 2010;
- European Union Registration No. 008269698, filed April 30, 2009, registered February 22, 2010; and
- United States Registration No. 4140613, filed September 22, 2009, registered May 15, 2012.

The marks cover goods and services in International Classes 1, 5, 40, and 42, including biological preparations, microbial products, waste treatment services, and scientific research services. CKM Holdings Inc. has licensed use of the marks to Genesis Biosciences LLC, which has used them continuously in commerce since registration. The Complainants will hereinafter be referred to as the "Complainant".

The Complainant operates websites at the domain names <genesisbiosciences.com/uk/>, <genesisbiosciences.us/>, and <genesisbiosciences.it/>, registered in 2009, 2010, and 2017 respectively.

The disputed domain name <genesis-biosciences.com> was registered on January 10, 2026, by the Respondent, whose registrant organization was identified by the Registrar as Genesis BioScience Research LLC. The disputed domain name resolves to an under-construction page displaying only the domain name, with no indication of intended use or a completion timeline.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the three elements required under the Policy for a transfer of the disputed domain name.

The Complainant contends that it holds registered trademark rights in GENESIS BIOSCIENCES in the United Kingdom, the European Union, and the United States, and that the disputed domain name is identical or confusingly similar to those marks. The Complainant notes that the disputed domain name incorporates the mark in its entirety, differing only by the addition of a hyphen between the two words, which the Complainant submits is not distinctive and is likely to be disregarded by consumers. The Complainant further notes that the ".com" generic Top-Level Domain ("gTLD") is disregarded for purposes of this comparison.

The Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant asserts that it has not authorized or licensed the Respondent to use its marks in any manner, that the Respondent is not commonly known by the disputed domain name, and that the Respondent has made no bona fide offering of goods or services in connection with the disputed domain name.

The Complainant contends that the disputed domain name was registered and is being used in bad faith. The Complainant asserts that given the established reputation of the GENESIS BIOSCIENCES mark, the Respondent must have been aware of the mark at the time of registration. The Complainant further asserts that the disputed domain name resolves to an under-construction page, which the Complainant submits constitutes passive holding and is consistent with an intent to capitalize on the goodwill associated with the Complainant's marks.

B. Respondent

The Respondent did not submit a formal Response to the Complaint. On April 9, 2026, the Respondent sent an informal email communication to the Center. The Respondent stated that the disputed domain name had been used for email purposes only and that the Respondent no longer used it.

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 Select UDRP Questions, Third Edition ("[WIPO Overview 3.1](#)"), section 1.7.

The disputed domain name <genesis-biosciences.com> incorporates the Complainant's mark in its entirety. The only difference between the mark and the second-level domain is the addition of a hyphen between the words "genesis" and "biosciences". Panels have consistently found that the addition of a hyphen does not prevent a finding of confusing similarity.

The gTLD ".com" is disregarded as a standard registration requirement. [WIPO Overview 3.1](#), section 1.11.1. The Panel finds that the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights.

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 that 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 3.1](#), 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 disputed domain name resolves to an under-construction page, which does not

constitute a legitimate noncommercial or fair use in the circumstances of this case, as discussed further below.

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.

The Complainant's GENESIS BIOSCIENCES mark has been in continuous use since 2009 and is registered in at least three jurisdictions. The Respondent registered the disputed domain name in January 2026, well after the Complainant's marks were established. Given the distinctive nature of the GENESIS BIOSCIENCES mark and the Respondent's choice to register a domain name incorporating that mark in its entirety with the sole addition of a hyphen, the Panel finds it implausible that the Respondent was unaware of the Complainant's mark at the time of registration. This inference is reinforced by the fact that the Respondent's registrant organization, Genesis BioScience Research LLC, closely mirrors the Complainant's mark, suggesting familiarity with it.

Panels have found that the non-use of a domain name, including a blank or "coming soon" page, would not by itself prevent a finding of bad faith under the doctrine of passive holding. In considering the totality of the circumstances, panels have found that the registration and non-use of a domain name can still constitute bad faith under the Policy. [WIPO Overview 3.1](#), section 3.3. The disputed domain name has resolved to an under-construction page since at least January 28, 2026, with no indication of intended use. The Respondent's informal communication to the Center offered no legitimate explanation for the registration and confirmed that the Respondent has no continuing interest in the disputed domain name.

The Panel finds that the third element of the Policy has 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 <genesis-biosciences.com> be transferred to the Complainant.

/William F. Hamilton/

William F. Hamilton

Sole Panelist

Date: April 20, 2026