

ADMINISTRATIVE PANEL DECISION

F. Hoffmann-La Roche AG v. linda puckette, linda puckette
Case No. D2026-1133

1. The Parties

The Complainant is F. Hoffmann-La Roche AG, Switzerland, internally represented.

The Respondent is linda puckette, linda puckette, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <us-roche.com> is registered with Tucows Domains Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 17, 2026. On March 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 18, 2026, 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 amendment to the Complaint on March 19, 2026.

The Center verified that the Complaint together with the amendment to 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 March 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 12, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 14, 2026.

The Center appointed Mireille Buydens as the sole panelist in this matter on April 20, 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, established in 1896, is a Swiss healthcare company and one of the leading pharmaceutical companies in the world, having global operations in more than 100 countries, including the United States.

The trademark ROCHE (hereafter “the Trademark” or “the ROCHE Trademark”) serves as house-mark of the Complainant and is protected as a registered trademark in a multitude of countries around the world, including:

- International Registration No. 340483 for ROCHE (word mark) registered on November 14, 1967;
- International Registration No. 346223 for ROCHE (word mark) registered on June 19, 1968; and
- International Registration No. 832631 for ROCHE (word and design mark) registered on April 8, 2004.

The Complainant owns and uses the domain name <roche.com> for its corporate official website.

The disputed domain name has been registered on December 14, 2025. According to the Complaint, the disputed domain name redirects to a website with no content, but the disputed domain name was used for an email scam and a phishing scheme by the Respondent pretending to be the human resources department of the Complainant. The Complainant sent a cease and desist letter through the Registrar on March 5, 2026. The Respondent did not reply.

At the date of this Decision, the disputed domain name resolves to an error page.

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.

First, the Complainant contends that the disputed domain name is confusingly similar to the ROCHE Trademark, as it includes the mark entirely. The addition of the term “us”, merely referring to a geographical denomination (“us” for “United States”), and a hyphen does not impact the confusing similarity between the disputed domain name and the ROCHE Trademark.

Second, the Complainant asserts that the Respondent lacks rights or legitimate interests in the disputed domain name. The Respondent uses the disputed domain name as part of a phishing scheme. The phishing scheme uses the disputed domain name as its root to create the impression that an email is sent by the human resources department of the Complainant in order to fraudulently induce recipients to provide personal information. Such phishing scam cannot be considered a bona fide offering of goods or services nor a legitimate noncommercial or fair use of the disputed domain name. The Respondent deliberately attempts to create a likelihood of confusion among Internet users and/or to freeride on the goodwill of the Complainant's ROCHE Trademark, for illegitimate commercial gain including phishing activities.

The Complainant finally contends that the Respondent registered and uses the disputed domain name in bad faith. Concerning the registration in bad faith, the Complainant contends that its ROCHE Trademark is well known and predates the registration of the disputed domain name. The Respondent must have undoubtedly been aware of the existence of the Complainant's ROCHE Trademark when it registered the disputed domain name. Concerning the use in bad faith, the Complainant contends that the use of the disputed domain name, which is confusingly similar to the ROCHE Trademark, for an email scam constitutes opportunistic bad faith. The Respondent is illegitimately capitalizing on the Complainant's reputation and goodwill in its ROCHE Trademark in order to confuse Internet users for commercial gain.

B. Respondent

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

6. Discussion and Findings

Dealing with the Respondent's failure to file a response to the Complaint, paragraph 14(b) of the Rules provides that if a party, in the absence of exceptional circumstances, does not comply with a provision of, or requirement under these Rules, the panel shall be entitled to draw such inferences from this omission, as it considers appropriate.

Paragraph 4(a) of the Policy provides that the Complainant proves each of the following three elements in order to succeed in its Complaint:

- (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.

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 ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the ROCHE Trademark is reproduced within the disputed domain name, with the addition of the prefix "us" followed by a hyphen. Accordingly, the disputed domain name is confusingly similar to the ROCHE Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms, here the prefix "us" followed by a hyphen, may bear on assessment of the second and third elements, the Panel finds the addition of such prefix does not prevent a finding of confusing similarity between the disputed domain name and the ROCHE Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), 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 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.

It results from the Complaint that the Respondent is not licensed by, nor affiliated with, the Complainant in any way. Based on the available records, the Panel finds that there is no evidence that the Respondent is commonly known by the disputed domain name. There is no evidence of use or demonstrable preparations to use the disputed domain name for a bona fide offering of goods or services, nor any evidence of legitimate noncommercial or fair use of the disputed domain name. On the contrary, the Panel notes that the disputed domain name reproduces the ROCHE Trademark with the mere addition of the prefix "us" followed by a hyphen, which can refer to the English pronoun "us" or to the initials of the United States (where the Complainant is notably active and where the Respondent is reportedly located). Even where a domain name consists of a trademark plus an additional term, UDRP panels have largely held that such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. The Panel finds, on balance, that the Respondent has targeted the Complainant's Trademark by incorporating its entirety in the disputed domain name and effectively impersonating the Complainant. [WIPO Overview 3.1](#), section 2.5.1.

The Panel further notes that the Complaint and the evidence filed refer to the use of the disputed domain name by the Respondent in a phishing scheme, as an email was sent from an email address configured with the disputed domain name, impersonating the human resources department of the Complainant for promoting a fraudulent employment offer. The Respondent did not challenge this finding. Panels have held that the use of a domain name for illegitimate activity, here, claimed phishing activities, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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 has composed the disputed domain name by combining the Complainant's well-known ROCHE Trademark, which predates the registration of the disputed domain name by decades, with the prefix "us" followed by a hyphen. The prefix "us" can either refer to the English pronoun "us" or to the initials of the United States (where the Complainant is notably active and where the Respondent is reportedly located) and can confuse Internet users into falsely believing that the disputed domain name is owned or sponsored by the Complainant. In the circumstances, and in the absence of any explanation from the Respondent for its choice of the disputed domain name, the Panel can only reasonably infer that the Respondent registered the disputed domain name in the knowledge of the Complainant's well-known ROCHE Trademark and with the intention of taking unfair advantage of the goodwill attached to it by causing confusion among Internet users.

Moreover, panels have held that the use of a domain name for illegitimate activity constitutes bad faith. In the present case, it results from the Complaint and the available records that the disputed domain name has been used in a phishing attempt. The disputed domain name has been used for sending an email pretending to be sent by the human resources department of the Complainant and containing a fraudulent employment offer. Panels have held that the use of a domain name for illegal activities, here phishing attempt, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

The disputed domain name currently resolves to an error page which does not alter the Panel's finding of bad faith as the disputed domain name was used as an email address in a phishing scheme. Having

reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's ROCHE Trademark, the composition of the disputed domain name (reproducing the ROCHE Trademark in its entirety preceded by the descriptive prefix "us" followed by a hyphen), the use of the disputed domain name, and the failure of the Respondent to submit a response. The Panel finds that in the circumstances of this case the Respondent registered and used the disputed domain name in 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 <us-roche.com> be transferred to the Complainant.

/Mireille Buydens/

Mireille Buydens

Sole Panelist

Date: April 27, 2026