ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Fenix International Limited c/o Walters Law Group v. Mike Mikovish, Fan Beast
Case No. D2026-1286

1. The Parties

The Complainant is Fenix International Limited c/o Walters Law Group, United States of America.

The Respondent is Mike Mikovish, Fan Beast, Ukraine.

2. The Domain Name and Registrar

The disputed domain name <onlyfans4.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 March 25, 2026. On March 26, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 26, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 27, 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 27, 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 31, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 20, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 21, 2026.

The Center appointed Levan Nanobashvili as the sole panelist in this matter on April 27, 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 owns and operates a social media platform located at <onlyfans.com> allowing users to post and subscribe to audiovisual content, including adult-oriented one. In 2026 "onlyfans.com" website is one of the most popular websites in the world, with more than 305 million registered users.

The Complainant owns numerous registrations worldwide for ONLYFANS, including the following:

1) European Union Trade Mark (word), Registration No. 017912377, registered on January 9, 2019, in International Classes 9, 35, 38, 41, and 42;
2) United Kingdom trademark (word), Registration No. UK00917912377, registered on January 9, 2019, in International Classes 9, 35, 38, 41, and 42; and
3) United States of America trademark (word), Registration No. 5769267, registered on June 4, 2019, in International Class 35.

The Complainant also asserts common law trademark rights arising from its use of ONLYFANS since 2016.

The Complainant holds the domain name <onlyfans.com> since 2013.

The disputed domain name was registered on December 16, 2025. At the time of the Complaint and the Decision, the disputed domain name resolves to a website displaying a logo similar to the Complainant's registered trademark. The website features a pop-up password prompt and triggers a browser-based security alert warning of potential phishing and malware risks.

The Respondent is an individual reportedly residing in Ukraine.

The Complainant sent a cease-and-desist letter to the Respondent on January 8, 2026. The Respondent did not reply.

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:

(i) it owns the ONLYFANS registered mark since June 5, 2018, while its common law rights in ONLYFANS date back to 2016;

(ii) the disputed domain name is confusingly similar to the Complainant's mark;

(iii) the Respondent has no connection or affiliation with the Complainant and has received no authorization or license to use the Complainant's mark;

(iv) the Respondent holds no trademark rights corresponding to the disputed domain name;

(v) the Respondent would be unable to provide credible evidence of rights or legitimates interests in the disputed domain name;

(vi) the Respondent's website displays a logo that is confusingly similar to the Complainant's registered trademark;

(vii) the Respondent registered the disputed domain name specifically to target the Complainant's mark;

(viii) evidently the Respondent was fully aware of the Complainant's mark at the time of the registration of the disputed domain name, demonstrated by the use of the confusingly similar logo on the website; and

(ix) the Respondent has registered and is using the disputed domain name to intentionally divert Internet traffic from the Complainant's official website for commercial gain.

B. Respondent

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

6. Discussion and Findings

6.1. Procedural Issue – Location of the Respondent

Under paragraph 10 of the Rules, the Panel is required to ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case, and also that the administrative proceedings take place with due expedition.

The location of the Respondent disclosed by the Registrar appears to be in Ukraine, which is subject to an international conflict at the date of this Decision that may impact case notification. It is therefore appropriate for the Panel to consider, in accordance with its discretion under paragraph 10 of the Rules, whether the proceedings should continue. Having considered all the circumstances of the case, the Panel is of the view that it should.

The Panel notes that the Center sent the Complaint to the Respondent's disclosed email address and the postmaster address in accordance with the Rules. Delivery to the postmaster address failed. However, the Panel finds no evidence of non-delivery to the Respondent's registered email address, as no delivery failure notification was received.

The Panel notes that the disputed domain name was registered on December 16, 2025, several years after the commencement of the international conflict. This indicates that, at the time of registration of the disputed domain name, the Respondent was able to provide the Registrar with a functioning email and postal addresses despite the conflict, and therefore appears capable of controlling the disputed domain name. Moreover, given that the Respondent evidently has Internet access, it is reasonable to conclude that the Respondent would have received at least the electronic notice of these proceedings.

The Panel further notes that the Center's postal notification sent to the Respondent's registered mailing address arrived in the destination country on April 11, 2026, and reached its collection point on April 14, 2026.

The Respondent thus appears to have received notification of the Complaint and would have been able to formulate and file a Response in the administrative proceedings in case it wished to do so.

Having determined that the Respondent received a fair opportunity to present its case, the Panel will proceed to a decision to ensure the timely conclusion of these proceedings.

6.2. Substantive Issues

Under paragraph 4(a) of the Policy, the Complainant carries the burden of proving that:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
(ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
(iii) the disputed domain name has been registered and is being used in bad faith.

The Respondent's default in the case at hand does not automatically result in a decision in favor of the Complainant. However, paragraph 5(f) of the Rules provides that if the Respondent does not submit a Response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the Complaint.

Further, according to paragraph 14(b) of the Rules, the Panel shall draw such inferences from the Respondent's failure to submit a Response as it considers appropriate.

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 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 3.1, section 1.7.

Although the addition of other terms, in this case the numeral "4", may bear on the assessment of the second and third elements, the Panel finds that the addition of such a 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 3.1, section 1.8. See also *SportPesa Holdings Ltd v. Frame Darvin*, WIPO Case No. D2025-0595, *Fenix International Limited v. myviproomss.com*, WIPO Case No. D2022-0217, and *Vontobel Holding Ltd. v. Vontobell LLC*, WIPO Case No. D2008-1559.

The addition of the generic Top-Level Domain ".com" is a standard registration requirement and, as such, is disregarded under the first element confusing similarity test. WIPO Overview 3.1, section 1.11.1.

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.

The Respondent provided no evidence that it has used or made demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods or services, has been commonly known by the disputed domain name, or has made a legitimate noncommercial use thereof. The Respondent has not rebutted the Complainant's contention that it has not authorized the Respondent to use the ONLYFANS mark, or that there is no relationship between them that would justify the Respondent's registration and use of the Complainant's trademark in the disputed domain name.

Panels have held that the use of a domain name for illegitimate activity, such as, as claimed here, phishing, can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1. In the present case, the Respondent's website features a pop-up password prompt and triggers a browser-based security alert warning of potential phishing and malware risks.

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.

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 3.1, section 3.2.1.

The Panel notes that the Complainant's trademark registration predates the registration of the disputed domain name. A gap of several years between registration of the Complainant's trademark and the Respondent's registration of the disputed domain name containing the trademark at issue can indicate bad faith registration. See *Hunza G Limited v. Nikos Kalouris,* WIPO Case No. D2025-3956 and *Hi-TEC Sports International Holdings B.V. v. Thomas Birch, Finlay Nolan, Anna Akhtar, Tyler Reynolds, Keira Donnelly*, WIPO Case No. D2024-1891.

Panels have consistently found that the mere registration of a domain name that is confusingly similar to a famous or widely known trademark by an unaffiliated entity can by itself create a presumption of bad faith. WIPO Overview 3.1, section 3.1.4.

A significant number of panels have consistently found that the Complainant's ONLYFANS mark is widely known. In *Fenix International Limited v. Carlos Lopez*, WIPO Case No. D2023-0688, the Panel noted "It is uncontested that Complainant's ONLYFANS mark and website linked to <onlyfans.com> are well known among the relevant segment of Internet users". In *Fenix International Limited v. Aleksandr V Stepanov*, WIPO Case No. D2022-3483, the Panel noted "[...] it has been proven to the Panel's satisfaction that the Complainant's ONLYFANS trademark is well known and unique to the Complainant". See also *Fenix International Limited v. Klay Rose*, WIPO Case No. D2023-0687, *Fenix International Limited c/o Walters Law Group v. Withheld for Privacy Purposes, Privacy Service Provided by Withheld for Privacy ehf / rajeev Shrestha*, WIPO Case No. D2021-2076, and *Fenix International Limited v. WhoisGuard Protected, WhoisGuard, Inc / Genadiy Ivanov*, WIPO Case No. D2021-0828.

The Panel finds it unlikely that the Respondent was unaware of the Complainant's ONLYFANS mark when registering the disputed domain name. Given this prior knowledge, and in accordance with section 3.1.4 of the WIPO Overview 3.1, the Panel concludes that the Respondent's incorporation of the Complainant's mark in the disputed domain name, for which no explanation was provided, creates a presumption of bad faith in the circumstances of this case.

The Panel finds that the Respondent either knew or ought to have known of the Complainant's mark and likely registered the disputed domain name to target it. The Panel's finding is reinforced by the fact that the Respondent's website displays the logo which is similar to the Complainant's registered mark.

Pursuant to paragraphs 10 and 12 of the Rules, the Panel undertook limited independent factual research on the Respondent's website. The Panel may undertake limited factual research into matters of public record if such information is useful to assessing the case merits and reaching a decision. WIPO Overview 3.1, section 4.8. The Panel's attempt to access the Respondent's website resulted in a browser-based security alert warning of potential phishing and malware risks. This evidence, coupled with the Respondent's failure to provide a Response, reinforces the finding that the disputed domain name is used in bad faith to facilitate deceptive or harmful activity.

Panels have held that the use of a domain name for illegitimate activity, such as, as claimed here, phishing, constitutes bad faith. WIPO Overview 3.1, section 3.4.

The Respondent failed to reply to the cease-and-desist letter and did not explain or justify the use of the Complainant's trademark in the disputed domain name. UDRP panels have consistently held that the failure to respond to a cease-and-desist letter may be a factor in establishing bad faith registration and use of a domain name. See *Carrefour v. Jan Everno, The Management Group II*, WIPO Case No. D2017-0586, *Remy Cointreau Luxembourg S.A. v. Deividas Samulionis, UAB "Sentosa"*, WIPO Case No. D2016-2232, and *Encyclopaedia Britannica, Inc. v. John Zuccarini and The Cupcake Patrol a/ka Country Walk a/k/a Cupcake Party,* WIPO Case No. D2000-0330.

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 <onlyfans4.com> be transferred to the Complainant.

/Levan Nanobashvili/
Levan Nanobashvili
Sole Panelist
Date: May 4, 2026