

ADMINISTRATIVE PANEL DECISION

**Barnes Europe Consulting Kft., Ms. Heidi Barnes-Watson v. Administrator
Domain**

Case No. D2026-1574

1. The Parties

The Complainants are Barnes Europe Consulting Kft., Hungary, and Ms. Heidi Barnes-Watson, United States of America (“United States”), represented by MIIP MADE IN IP, France.

The Respondent is Administrator Domain, United States.

2. The Domain Name and Registrar

The disputed domain name <barnes-international.com> is registered with NameSilo, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 14, 2026. On April 15, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 15, 2026, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

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 April 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 6, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent of its default on May 7, 2026.

The Center appointed Steven Auvil as the sole panelist in this matter on May 12, 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 joint owners of the BARNES trademarks and operate an international luxury real estate business with activities spanning numerous countries and markets.

The Complainants own various trademark registrations for BARNES, including International Trademark No. 1114909, registered March 13, 2012 for BARNES and United Kingdom Trademark No. UK00801114909, registered March 26, 2013 also for BARNES. The Complainants also own and operate domain names incorporating their mark, including <barnes-international.com>, which hosts their official website.

The Respondent registered the disputed domain name on February 10, 2026. According to the Complaint, the disputed domain name resolves to a parking page and, at times, has been associated with inactive or error pages. Additionally, mail exchanger (“MX”) records were configured for the domain name, suggesting potential use for email communications.

5. Parties’ Contentions

A. Complainants

The Complainants contend that they have satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

First, the Complainants contend that the disputed domain name is confusingly similar to the BARNES mark, incorporating the mark in its entirety into the disputed domain name along with a typographical variation of the descriptive term “international”. Second, the Respondent has no rights or legitimate interests in the disputed domain name, as it is not authorized and is not using the domain name for a bona fide purpose. Finally, the disputed domain name was registered and is being used in bad faith, including through typosquatting, passive holding, and the registration of the disputed domain name for potential email use.

The Complainants request transfer of the disputed domain name.

B. Respondent

The Respondent did not reply to the Complainants’ contentions.

6. Discussion and Findings

According to paragraph 15(a) of the Rules: “[a] Panel shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.” Paragraph 4(a) of the Policy directs that the Complainants must prove each of the following to obtain relief:

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

In view of the Respondent’s failure to submit a Response, the Panel is entitled to accept as true the allegations set forth in the Complaint (unless the evidence is clearly contradictory), and to derive reasonable inferences from the evidence presented.

Based on the foregoing guidance, the Panel makes the following findings and conclusions based on the allegations and evidence contained in the Complaint, and reasonable inferences drawn from the evidence presented.

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

As set forth in [WIPO Overview 3.1](#), section 1.7, when the entirety of a mark is reproduced within the disputed domain name, or "at least a dominant feature of the relevant mark is recognizable in the domain name", the disputed domain name is deemed confusingly similar to the mark for the purposes of the Policy. Further, where the "relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise)" does not prevent a finding of confusing similarity. [WIPO Overview 3.1](#), section 1.8.

The Panel finds that the disputed domain name incorporates the BARNES mark in its entirety and differs only by the inclusion of a misspelled version of the term "international" along with a hyphen. The Panel finds that the mark is clearly recognizable within the domain name and therefore the disputed domain name is confusingly similar to the Complainants' BARNES mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Indeed, the addition of a descriptive term, even when misspelled, does not prevent a finding of confusing similarity and is a typical example of typosquatting. Although the addition of other terms, here a misspelled version of "international" as "intersnational" with the addition of a hyphen, may bear on assessment of the second and third elements, the addition of such 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.

Additionally, as set forth in section 1.11.1 of the [WIPO Overview 3.1](#), the applicable generic Top-Level Domain ("gTLD") (e.g., ".com" or ".org") is viewed as a standard registration requirement and as such is typically disregarded under the first element's confusing similarity test. As such, the use of ".com" gTLD in the disputed domain name has no bearing on the confusing similarity analysis.

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. Such circumstances include:

- (i) before any notice of the dispute, the Respondent used, or prepared to use, the disputed domain name or a name corresponding to the disputed domain name in connection with a bona fide offering of goods or services;
- (ii) the Respondent (as an individual, business, or other organization) is commonly known by the disputed domain name, even if the Respondent has acquired no trademark or service mark rights; or
- (iii) the Respondent is making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or tarnish the trademark or service mark at issue.

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 Complainants have made a prima facie showing that the Respondent lacks rights or legitimate interests in the disputed domain name by demonstrating that the Respondent received no authorization or license to use the BARNES mark, that there is no evidence that the Respondent is commonly known by the disputed domain name, and that the disputed domain name is being used as a parking page rather than to offer of goods or services. The Respondent has failed to rebut this showing. Panels have consistently held that the use of a domain name for pay-per-click parking pages does not establish rights or legitimate interests where it capitalizes on confusion with a complainant’s trademark.

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.

In the present case, the Panel concludes that the Respondent registered and used the disputed domain name in bad faith based on the following evidence.

First, the disputed domain name incorporates the entirety of the Complainants’ registered and well-known BARNES mark and appends the term “intersnational” set off by a hyphen.

Second, the disputed domain name is associated with an inactive website. In looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. The Panel notes the distinctiveness or reputation of the Complainants’ trademark along with the stark similarity between the disputed domain name and the Complainants’ domain name supports a finding of bad faith under the Policy

Third, there is evidence of one email account associated with the disputed domain name. The Panel finds that the existence of email accounts increases the risk that the Respondent could use the disputed domain name to contact the Complainants’ customers and deceive Internet users as to the Respondent’s affiliation with the Complainants for illicit gain. See *Minerva S/A v. Chang Choi*, WIPO Case No. [D2022-1425](#).

For these reasons, the Panel finds that the Complainants have 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 <barnes-international.com> be transferred to the Complainants.

/Steven Auvil/

Steven Auvil

Sole Panelist

Date: May 26, 2026