

ADMINISTRATIVE PANEL DECISION

Michael Page Recruitment Group Limited v. isaac ngumi
Case No. D2026-1891

1. The Parties

The Complainant is Michael Page Recruitment Group Limited, United Kingdom, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondent is isaac ngumi, Kenya.

2. The Domain Name and Registrar

The disputed domain name <michaelpageplc.com> is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 1, 2026. On May 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 28, 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 Purposes, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 29, 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 amended Complaint on June 3, 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 June 9, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 29, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on June 30, 2026. The Respondent sent an informal communication on June 30, 2026.

The Center appointed Pablo A. Palazzi as the sole panelist in this matter on July 3, 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 Michael Page Recruitment Group Limited, a wholly-owned subsidiary of PageGroup plc (formerly Michael Page International plc). Founded in 1976, the Complainant is one of the world's leading professional recruitment companies.

The Complainant is headquartered in the United Kingdom, where its parent company is publicly listed on the London Stock Exchange. The Complainant's group operates a global network spanning 36 countries, employing approximately 7,361 individuals across 129 offices. The group's reported gross profit of GBP 842.6 million in Fiscal Year 2024.

The Complainant holds valid registrations for the MICHAEL PAGE trademark with the United Kingdom Intellectual Property Office ("UKIPO"), registration number UK00002111720, since March 21, 1997, the European Union Intellectual Property Office ("EUIPO"), registration number 002001493, since March 22, 2002, the United States Patent and Trademark Office ("USPTO"), registration number 2940342, since April 12, 2005, and the Canadian Intellectual Property Office ("CIPO"), registration number TMA740688, since May 25, 2009. These registrations cover various international classes, primarily International Classes 9, 16, 35, 38 and 41, directly related to its core recruitment and professional services.

The Complainant's primary domain names are <michaelpage.com> and <page.com>.

The disputed domain name was registered on April 16, 2025. The Respondent is using the disputed domain name to resolve to a website that resolves to a blank page and lacks content.

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.

B. Respondent

The Respondent did not reply to the Complainant's contentions. However, it sent an informal communication asking: "Do they consider buying the domain from me?"

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 ("[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 identical to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The Panel finds the mark is recognizable 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 here “plc” (the commonly known and abbreviated form for the words “public limited company”) may bear on assessment of the second and third elements, the Panel finds 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.

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 Panel finds the disputed domain name carries a risk of implied affiliation with the Complainant. The composition of the disputed domain name, comprising the Complainant’s well known MICHAEL PAGE trademark in its entirety and the intentional addition of the letters “plc” (being this the former company name of the Complainant) after the trademark signals the Respondent’s intention of taking unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant.

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 registered the disputed domain name on April 16, 2025, which is significantly after Complainant filed for registration of its MICHAEL PAGE trademark with the UKIPO, EUIPO, USPTO and CIPO, and also significantly after Complainant’s first use in commerce of its trademark in 1976.

- the registration of the disputed domain name also falls significantly after the Complainant's registration of its <michaelpage.com> and <page.com> domain names on June 1, 1996 and August 24, 1993, respectively.
- UDRP panels have recognized the global notoriety and well-known status of the MICHAEL PAGE trademark, as notably affirmed in *Michael Page International v. Hassan El Mansouri*, WIPO Case No. [DMA2012-0001](#).
- the Respondent added the term "plc" to the Complainant's MICHAEL PAGE trademark, thereby making the disputed domain name confusingly similar to the Complainant's trademark and the former trading name of the Complainant's group, Michael Page International PLC.

Under these circumstances, there is no plausible good-faith reason or logic for the Respondent to have registered the disputed domain name other than to intentionally trade off the goodwill of the Complainant's brand.

Panels have found that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, 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. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's trademark, and the composition of the disputed domain name including the addition of the "plc" term as mentioned above, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

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 <michaelpageplc.com> be transferred to the Complainant.

/Pablo A. Palazzi/

Pablo A. Palazzi

Sole Panelist

Date: July 17, 2026.