ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Brixmor Property Group, Inc. v. James Richard
Case No. D2026-2132

1. The Parties

The Complainant is Brixmor Property Group, Inc., United States of America ("United States"), represented by Neal, Gerber & Eisenberg LLP, United States.

The Respondent is James Richard, United States.

2. The Domain Name and Registrar

The disputed domain name <brixmorssoo.com> is registered with Nicenic International Group Co., Limited (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 16, 2026. On May 18, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 19, 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 May 21, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 10, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 11, 2026.

The Center appointed Kathryn Lee as the sole panelist in this matter on June 16, 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 a publicly traded real estate investment trust that invests in shopping centers. The Complainant was founded in 2003 and as of December 31, 2024, owned 363 shopping centers containing 64 million square feet of retail space. In 2024, the Complainant saw revenues of 1.285 billion USD and net income of 339 million USD, and had 454 employees. The Complainant has been mentioned in the media and publications such as Forbes, Barron’s, CNBC, the Chicago Tribune, Investors’ Business Daily, and Simply Wall Street. The Complainant owns the following trademark registration for the BRIXMOR mark in the United States: Registration Number 4269899 registered on January 1, 2013.

Based on information from the Registrar, the Respondent is an individual with an address in the United States.

The disputed domain name was registered on December 25, 2025. When accessed via Google Chrome, the disputed domain name resolves to a warning page stating “Dangerous site” and “Attackers on the site you tried visiting might trick you into installing software or revealing things like your passwords, phone, or credit card numbers. Chrome strongly recommends going back to safety”.

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 the disputed domain name is confusingly similar to the BRIXMOR mark in which it has rights as the disputed domain incorporates BRIXMOR in its entirety with only the additional term “ssoo”. The Complainant contends that “ssoo” is a misspelling of “sso”, an acronym for “single sign-on”, which is a descriptive term.

Next, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name, and that there is no evidence that the Respondent has been commonly known by the disputed domain name. The Complainant also contends that the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services, but rather, illegal activities based on the warnings displayed when trying to access the disputed domain name which cannot confer legitimate rights or interests on the Respondent.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith. Specifically, the Complainant contends that by virtue of the Complainant’s trademark registrations for BRIXMOR, the Respondent had at least constructive knowledge of the Complainant’s rights in the mark. The Complainant also contends that “ssoo” is a misspelling of “sso” which is included to impersonate the Complainant and defraud the Complainant’s customers.

B. Respondent

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

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 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, "ssoo" – 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.

Furthermore, panels have held that the use of a domain name for illegal activity – here, claimed phishing/fraud – can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1. The Panel notes that warnings from Google Chrome indicate that the disputed domain name has been reported for phishing concerns, which does not support any finding of rights or legitimate interests.

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 which is confusingly similar to the Complainant's mark. Based on the confusing similarity of the disputed domain name to the Complainant's mark, as well as the distinctiveness of the Complainant's coined mark, it is likely that the Respondent targeted the Complainant in registering the disputed domain name, and that the

Respondent likely did so in order to take advantage of the Complainant's mark in some manner. It is highly improbable that the disputed domain name was registered in good faith and without knowledge of the Complainant's trademark, and the Panel notes that the Respondent has failed to submit a response or object to the Complainant's serious allegations that the Respondent is engaged or will engage in fraudulent activity.

Further, Google Chrome warns visitors from accessing the website at the disputed domain name, stating that it is a "dangerous site" which may trick visitors into phishing and malware activity. Such warnings are consistent with the use of domain names for fraudulent or deceptive purposes. Panels have held that the use of a domain name for illegal activity – here, claimed phishing/fraud – constitutes bad faith. WIPO Overview 3.1, section 3.4.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes 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 <brixmorssoo.com> be transferred to the Complainant.

/Kathryn Lee/
Kathryn Lee
Sole Panelist
Date: June 24, 2026