ADMINISTRATIVE PANEL DECISION

Equifax Inc. v. Receipt Mail, Social Services
Case No. D2026-2246

1. The Parties

The Complainant is Equifax Inc., United States of America (the "United States"), represented by The GigaLaw Firm, Douglas M. Isenberg, Attorney at Law, LLC, United States.

The Respondent is Receipt Mail, Social Services, United States.

2. The Domain Name and Registrar

The disputed domain name <equifax.rent> 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 May 25, 2026. On May 26, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 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 May 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 May 28, 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 June 1, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 21, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 30, 2026.

The Center appointed William F. Hamilton as the sole panelist in this matter on July 7, 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 corporation organized under the laws of Georgia, United States, that provides data, analytics, and technology solutions, including credit reporting and information services for businesses, governments, and consumers. The Complainant's common stock is listed on the New York Stock Exchange under the symbol “EFX”.

The Complainant owns registrations for the trademark EQUIFAX (the “Mark”) in at least 56 jurisdictions worldwide (Annex 10 to the Complaint). The Complainant’s registrations for the Mark in the United States include:

· United States Trademark Registration No. 1,027,544, first used in commerce on March 4, 1975, and registered on December 16, 1975;

· United States Trademark Registration No. 1,045,574, first used in commerce on March 4, 1975, and registered on August 3, 1976; and

· United States Trademark Registration No. 1,644,585, first used in commerce on March 4, 1975, and registered on May 14, 1991 (Annex 11 to the Complaint).

The Complainant is also the registrant of the domain name <equifax.com>, created on February 21, 1995, which the Complainant uses in connection with its primary website (Annexes 5, and 6 to the Complaint).

The disputed domain name <equifax.rent> was created on May 14, 2026 (Annex 1 to the Complaint). The disputed domain name resolves to an inactive “Launching Soon” webpage and is not connected to any active offering of goods or services (Annex 7 to the Complaint). At least one security vendor has reported that the disputed domain name is associated with spam (Annex 8 to the Complaint). The disputed domain name has Mail Exchange (“MX”) records configured, enabling it to send and receive emails (Annex 9 to the Complaint).

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the three elements required under the Policy for transfer of the disputed domain name.

The Complainant contends that the disputed domain name is identical or confusingly similar to the Mark. The Complainant submits that the disputed domain name reproduces the Mark in its entirety, with no other terms added apart from the “.rent” generic Top-Level Domain (“gTLD”), which is disregarded for purposes of the Policy.

The Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant submits that it has never authorized the Respondent to use the Mark, that the Respondent is not commonly known by the disputed domain name, and that the WhoIs record does not identify the Respondent as “Equifax” or any variation thereof.

The Complainant further submits that the Respondent's failure to use the disputed domain name in connection with an active website militates against a finding of a bona fide offering of goods or services or a legitimate noncommercial or fair use, and that the Respondent's association of the disputed domain name with spam likewise cannot confer rights or legitimate interests, as the use of a domain name for illegal activity can never do so. The Complainant also submits that, because the disputed domain name is identical to the Complainant's well-known Mark, it carries a high risk of implied affiliation, foreclosing any plausible good-faith use.

The Complainant further contends that the disputed domain name was registered and is being used in bad faith. The Complainant submits that the following circumstances demonstrate bad faith:

· the Mark is distinctive and well known, such that the Respondent is unlikely to have registered the disputed domain name without knowledge of the Mark;

· the disputed domain name is being passively held, and under the applicable passive-holding factors, this does not prevent a finding of bad faith given the strength of the Mark, the Respondent's undisclosed identity, and the absence of any conceivable good-faith use;

· the disputed domain name has been associated with spam, which itself constitutes evidence of bad faith; and

· the Respondent has configured MX records for the disputed domain name, which the Complainant submits indicates the disputed domain name may be used, or intended to be used, for fraudulent email communications.

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 the Mark for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The second-level portion of the disputed domain name consists of the Mark in its entirety, with no other term added. WIPO Overview 3.1, section 1.7.

The gTLD ".rent" is viewed as a standard registration requirement and is disregarded for the purposes of the confusing similarity test. WIPO Overview 3.1, section 1.11.

The Panel finds the disputed domain name is identical to the Mark for the purposes of the Policy.

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 disputed 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.

The Complainant has not authorized the Respondent to use the Mark, and there is no evidence that the Respondent is commonly known by the disputed domain name. WIPO Overview 3.1, section 2.3.

The disputed domain name is identical to the Complainant's well-known Mark and therefore carries a high risk of implied affiliation with the Complainant, for which no plausible good-faith use has been shown. WIPO Overview 3.1, section 2.5.1. Panels have held that the use of a domain name for illegal activity, including phishing, or other types of fraud, can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1. The Panel finds that the Respondent's possible association of the disputed domain name with spam, and the Respondent's configuration of MX records enabling the disputed domain name to send and receive emails, are not consistent with any bona fide offering of goods or services or any legitimate noncommercial or fair use.

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.

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 Mark is distinctive and has a strong reputation, and the disputed domain name was registered more than 50 years after the Complainant's earliest rights in the Mark. Noting the near-instantaneous and global reach of the Internet and search engines, and particularly in circumstances where the complainant's mark is widely known and a respondent cannot credibly claim to have been unaware of the mark, panels have been prepared to infer that the respondent knew, or should have known, that its registration would be identical or confusingly similar to a complainant's mark. WIPO Overview 3.1, section 3.2.2. The Panel finds that the Respondent registered the disputed domain name with knowledge of the Mark.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) 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, including the distinctiveness and reputation of the Mark, the Respondent's undisclosed identity, and the absence of any conceivable good-faith use to which the disputed domain name could be put, the Panel 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 use of a domain name for purposes other than to host a website, such as phishing, or other types of fraud, may constitute bad faith. WIPO Overview 3.1, section 3.4. The record shows that the disputed domain name may have been associated with spam, and that the Respondent has configured MX records for the disputed domain name, enabling it to send and receive email. The Panel finds that these circumstances are further evidence of the Respondent’s bad faith.

The Panel finds that disputed domain name was registered and is being used in bad faith, and 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 <equifax.rent> be transferred to the Complainant.

/William F. Hamilton/
William F. Hamilton
Sole Panelist
Date: July 15, 2026