ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Forbes LLC v. Rashi Patel
Case No. D2026-2553

1. The Parties

The Complainant is Forbes LLC, United States of America (“United States” or “U.S.”), represented by Riker Danzig LLP, United States.

The Respondent is Rashi Patel, United States.

2. The Domain Name and Registrar

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

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 11, 2026. On June 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 15, 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 (Unknown / Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 16, 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 June 17, 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 22, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 12, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 13, 2026.

The Center appointed Kathryn Lee as the sole panelist in this matter on July 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 the publisher of Forbes magazine, a business magazine founded in 1917. The Complainant publishes 48 editions of Forbes, including Forbes *France*, Forbes *Mexico*, and Forbes *India*, which are distributed in 81 countries and regions and in 31 languages. The magazine includes various lists and rankings, such as Forbes 30 Under 30, America's Best Companies, the World's Billionaires List, Highest-Paid Dead Celebrities, The World's Most Powerful Women, and The World's Most Profitable Sports Teams. In addition to Forbes magazine, the Complainant has published other print and digital publications under the FORBES name.

In 1997, the Complainant launched its website at "www.forbes.com", through which it provides online publications, webcasts, market updates, newsletters, and other information services. According to the Complainant, the website received approximately 78.85 million visits in March 2026.

The Complainant owns a number of trademark registrations for FORBES in jurisdictions around the world, including U.S. Trademark Registration No. 1141299 (registered November 11, 1980), Brazilian Trademark Registration No. 815558228 (registered February 18, 1992), and Japanese Trademark Registration No. 4501243 (registered August 24, 2001).

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 March 2, 2025, and resolves to a website displaying the FORBES mark in the same stylized manner as used by the Complainant and news articles relating to topics such as business, technology, real estate, the economy, and lifestyle.

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 identical or confusingly similar to the mark in which it has registrations and that the addition of the term "liechtenstein" is irrelevant to the determination of confusing similarity.

The Complainant also contends that the Respondent has no rights or legitimate interests in the disputed domain name and confirms that it has not authorized or licensed rights to the Respondent in any respect. The Complainant contends that the Respondent is not making a bona fide offering of goods or services, nor a legitimate, noncommercial fair use of the disputed domain name, since the use is creating a false association with the Complainant and its mark so as to benefit from its goodwill.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith. Specifically, the Complainant contends that given the fame of the FORBES mark, and use of the disputed domain name to also offer online articles, videos, and information on a variety of matters, the Respondent surely knew of the Complainant and its mark when registering the disputed domain name. The Complainant also contends that the Respondent's use of the disputed domain name disrupts the

Complainant's business and diverts traffic away from the Complainant for the Respondent's own commercial benefit.

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, "liechtenstein" – 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.

Moreover, where a domain name consists of a trademark plus an additional term, "UDRP panels have largely held that such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner." WIPO Overview 3.1, section 2.5.1. Here, the geographical term "liechtenstein" is added after the FORBES mark which, noting also the use to which the disputed domain name has been put, is likely to mislead Internet users into believing that the website at the disputed domain name is related to and/or operated by the Complainant's office in Liechtenstein, contrary to the fact.

In addition, the Respondent's website displayed the Complainant's mark, logo, design, color scheme from the Complainant's website, and therefore, had the overall look and feel of the Complainant's own official website at "www.forbes.com". Panels have held that the use of a domain name for illegitimate activity – here, claimed passing off – can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1.

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.

First, the disputed domain name consists of the Complainant's distinctive FORBES mark, plus the geographical term "liechtenstein". Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar to a well-known trademark can by itself create a presumption of bad faith. WIPO Overview 3.1, section 3.1.4.

Further, the Respondent uses the disputed domain name for a website displaying a website with similar look and feel of the Complainant's official Forbes website and offering competing services. Panels have held that the use of a domain name for illegitimate activity – here, claimed passing off – 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 <forbesliechtenstein.com> be transferred to the Complainant.

/Kathryn Lee/
Kathryn Lee
Sole Panelist
Date: July 22, 2026