

ADMINISTRATIVE PANEL DECISION

Instagram, LLC v. Cambuilder Manager
Case No. D2026-3117

1. The Parties

The Complainant is Instagram, LLC, United States of America ("United States" or "U.S."), represented by Hogan Lovells Cadwalader (Paris) LLP, France.

The Respondent is Cambuilder Manager, U.S., self-represented.

2. The Domain Name and Registrar

The disputed domain name <instagramcams.com> 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 July 15, 2026. On July 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 16, 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 July 17, 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 July 22, 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 July 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 12, 2026. On August 11, 2026, the Center received an email communication from a third party. On August 13, 2026, the Complainant's representative forwarded an email to the Center, which was sent to them on August 11, 2026, by the same third party. On August 13, 2026, the Center requested this third party to further clarify its relationship with the named Respondent and

no response was received. On August 18, 2026, the Center informed the Parties that it would proceed with panel appointment.

The Center appointed William F. Hamilton as the sole panelist in this matter on August 21, 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 operates a widely used photo and video sharing social networking application under the trademark INSTAGRAM (the “Mark”). Launched in 2010 and acquired by Facebook, Inc. (now Meta Platforms, Inc.) in 2012, the Complainant’s application has grown to over three billion monthly active accounts worldwide and has consistently ranked among the most downloaded mobile applications.

The Complainant owns numerous trademark registrations for the Mark, including International Registration No. 1129314, registered March 15, 2012; United States Trademark Registration No. 4,146,057, registered May 22, 2012; and European Union Trade Mark No. 014493886, registered December 24, 2015 (Annex 9 to the Complaint).

The disputed domain name was registered on April 19, 2026, using a privacy/proxy registration service (Annex 1 to the Complaint). The disputed domain name redirects to a third-party website, displaying adult content (Annex 10 to the Complaint).

5. Parties’ Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for transfer of the disputed domain name. The Complainant contends that it holds long-standing and extensive trademark rights in the Mark, and that the disputed domain name, which reproduces the Mark in its entirety together with the term “cams”, is confusingly similar to the Mark.

The Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name, having received no license or authorization from the Complainant, and that using the disputed domain name to redirect Internet users to an unrelated third-party website displaying adult content does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use.

The Complainant contends that the disputed domain name was registered and is being used in bad faith, given the fame of the Mark, the Respondent’s use of a privacy/proxy registration service, the Respondent’s failure to respond to the Complainant’s pre-Complaint outreach, and the tarnishing effect of associating the Mark with pornographic content.

The Complainant requests that the disputed domain name be transferred to the Complainant.

B. Respondent

The Respondent did not submit a formal Response to the Complaint. On August 11, 2026, an individual identifying itself as affiliated with “ICF Technology”, stated to own the named Respondent, Cambuilder, sent email communications to the Center and to the Complainant’s representatives requesting an extension of time to respond and a copy of the Complaint. The sender asserted, without supporting documentation, that ICF Technology/Cambuilder does not own or operate the disputed domain name, but has an affiliate agreement with the operator of the third-party website to which the disputed domain name redirects, and

stated that it had requested that the affiliate deregister the disputed domain name and remove the redirect, and that the affiliate relationship be terminated.

The Center invited the sender to further clarify its identity and relationship to the named Respondent and to provide information sufficient to establish the legitimacy of its request in the context of the current proceedings. No further clarification, extension request, email communication or formal Response was received, and the due date for a Response passed without one being filed.

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 disputed domain name incorporates the Mark in its entirety, together with the term "cams" and the ".com" generic Top-Level Domain ("gTLD"). The Panel finds the Mark is recognizable within the disputed domain name, and the addition of the term "cams" does not prevent a finding of confusing similarity. [WIPO Overview 3.1](#), section 1.8.

The gTLD is disregarded for purposes of comparison, as it is viewed as a standard technical requirement of registration. [WIPO Overview 3.1](#), section 1.11.1.

Accordingly, the disputed domain name is confusingly similar 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 the 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 entail the difficult task of "proving a negative", requiring information that is often primarily within the respondent's knowledge or control. 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.

The Respondent is not a licensee of the Complainant and is not affiliated with the Complainant in any way. The Complainant has not authorized the Respondent to use the Mark in the disputed domain name or otherwise. There is no evidence that the Respondent is commonly known by the disputed domain name.

The Respondent is using the disputed domain name, which incorporates the Complainant's distinctive Mark, to redirect Internet users to a third-party website, displaying adult content. This does not constitute a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy, nor a legitimate noncommercial or fair use under paragraph 4(c)(iii) of the Policy. The composition of the disputed domain name, combining the Mark with the term "cams", carries a risk of implied affiliation with the Complainant's photo and video sharing platform, further undermining any claim of fair use. [WIPO Overview 3.1](#), section 2.5.1.

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. The informal, unauthenticated communication from a third party who claimed to own the Respondent disclaiming direct ownership of the disputed domain name does not constitute relevant evidence of rights or legitimate interests, nor does it explain why the disputed domain name, reproducing the Mark in its entirety, was registered in the first place.

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 non-exhaustive list of such circumstances, 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 inherently distinctive and was well known throughout the world, with over three billion monthly active users, long before the disputed domain name was registered in April 2026. The Respondent could not credibly claim to have been unaware of the Complainant or the Mark at the time of registration. [WIPO Overview 3.1](#), section 3.2.2.

The Respondent is using the disputed domain name to redirect Internet users to a third-party website displaying adult content, thereby intentionally attempting to attract Internet users for commercial gain by creating a likelihood of confusion with the Mark as to the source, sponsorship, affiliation, or endorsement of the website. This constitutes bad faith registration and use under paragraph 4(b)(iv) of the Policy. The use of a domain name incorporating a distinctive trademark to redirect to a website displaying adult content further tarnishes the trademark, which is itself evidence of bad faith. [WIPO Overview 3.1](#), section 3.12.

Moreover, the disputed domain name was registered using a privacy/proxy registration service (Annex 1 to the Complaint), and the Respondent did not respond to the Complainant's pre-Complaint contact request submitted through the Registrar's Whois contact form (Annex 11 to the Complaint). These circumstances provide support for a finding of bad faith.

The informal and unauthenticated communication from a third party who claimed to own the Respondent disclaiming direct ownership of the disputed domain name, and its unsubstantiated reference to remedial action purportedly requested of an unnamed affiliate after the Complaint was filed, does not disturb the Panel's finding. Such communication does not explain why a domain name reproducing the Complainant's distinctive Mark was registered and configured to redirect to a third-party website in the first place.

Having reviewed the record, the Panel finds that the disputed domain name was registered and is being used in bad faith.

The Panel finds the third element of the Policy has been established.

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 <instagramcams.com> be transferred to the Complainant.

/William F. Hamilton/

William F. Hamilton

Sole Panelist

Date: September 4, 2026