

ADMINISTRATIVE PANEL DECISION

International Business Machines Corporation v. Aaron Stevens, IbmStudio Case No. D2026-3303

1. The Parties

The Complainant is International Business Machines Corporation, United States of America ("United States"), internally represented.

The Respondent is Aaron Stevens, IbmStudio, United States.

2. The Domain Names and Registrar

The disputed domain names <apply-ibm.com>, <explore-ibm.com>, <find-ibm.com>, <hiring-ibm.com>, <join-ibm.com>, and <search-ibm.com> are registered with Realtime Register B.V. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 24, 2026. On July 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 28, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (John Doe) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 30, 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 July 30, 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 August 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 1, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 4, 2026.

The Center appointed Gary Saposnik as the sole panelist in this matter on September 8, 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 was incorporated in 1911 and officially became International Business Machines in 1924. The Complainant has been offering products and services in the information technology space ever since, including computers, computer hardware, software, programs, and other computer products and services. The Complainant has a presence in over 175 countries through its wholly owned subsidiaries with over 288,300 employees worldwide.

The Complainant was ranked the 16th Most Valuable Global Brand in 2026 by the Kantar Brandz index, and was ranked the 22nd best global brand in 2025 by Interbrand. The Complainant has expended more than USD 8.3 billion on advanced research in 2025, and more than USD 1 billion annually marketing its goods and services globally, using the IBM trademark.

The Complainant owns and has owned trademark registrations for IBM in 131 countries around the world, for a broad range of goods and services, including but not limited to, information technology related goods and services. The Complainant's trademark registration for IBM includes the following registrations in the United States:

- IBM, United States Registration No. 4181289, registered July 31, 2012, in classes 9, 16, 18, 20, 21, 22, 25, 28, 35, and 41;
- IBM, United States Registration No. 3002164, registered September 27, 2005, in class 9;
- IBM, United States Registration No. 1694814, registered June 16, 1992, in class 36; and
- IBM, United States Registration No. 1205090, registered August 17, 1982, in classes 1, 9, 16, 37, and 41.

These registrations are referred to herein as the "IBM Trademark".

All of the disputed domain names were registered by the Respondent on May 17, 2026. The disputed domain names <explore-ibm.com>, <find-ibm.com>, <hiring-ibm.com>, and <search-ibm.com> redirect to the Complainant's official webpage at "www.ibm.com", while the disputed domain names <apply-ibm.com> and <join-ibm.com> previously redirected to the Complainant's webpage, but are currently inactive. Upon becoming aware of the disputed domain names, the Complainant sent a cease-and-desist letter to the Respondent, through the Registrar, at the email address listed in the WhoIs records, which the Respondent did not reply to.

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 names.

Notably, the Complainant contends that the disputed domain names are identical or confusingly similar to the IBM Trademark in which the Complainant has rights. The disputed domain names consist of descriptive words associated with career services, namely "apply", "explore", "find", "search", "join" or "hiring", followed by a hyphen, the letters "ibm", and the generic Top-Level Domain ".com". The letters "ibm" contained in the disputed domain names are exactly the same as the Complainant's IBM Trademark. The inclusion of the

hyphen sets apart the Complainant's IBM Trademark from the rest of the terms in the disputed domain names, which enhances the distinctiveness of the IBM Trademark in the disputed domain names.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain names. The Complainant has never licensed, contracted, or otherwise permitted anyone to apply to register the disputed domain names. There is no evidence that the Respondent is using the disputed domain names incorporating the Complainant's IBM Trademark for a bona fide offering of goods or services or noncommercial fair use. Such unauthorized use of the Complainant's trademark is likely to trick consumers into erroneously believing that the Complainant is somehow affiliated with the Respondent or endorsing its commercial activities, when no such relationship exists.

Lastly, the Complainant avers that the disputed domain names were registered and are being used in bad faith. Previous UDRP panels have found that "the registration of a domain name that is confusingly similar to a trademark by an entity that has no relationship to that mark may be sufficient evidence of opportunistic bad faith." *International Business Machines v. John Doe/Anonymize, Inc.*, WIPO Case No. [D2019-2754](#). The disputed domain names are confusingly similar to the Complainant's mark, and the Respondent has no relationship to the Complainant nor the IBM Trademark.

The Respondent was well aware of the Complainant's IBM Trademark at the time the Respondent registered the disputed domain names, with the Complainant's trademarks being well known around the world. The Respondent registered the disputed domain names at least 69 years after the Complainant established registered trademark rights in the IBM Trademark. Internet search engines yield results for the Complainant and its products/services when using "APPLY IBM", "EXPLORE IBM", "FIND IBM", "HIRING IBM", "JOIN IBM", "SEARCH IBM" and "IBM" as search terms. As such, the Respondent either knew or should have known of the Complainant's IBM mark when registering the disputed domain names.

The Complainant argues that there may be a presumption of bad faith solely through redirecting the domain name to the complainant's or a competitor's website. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 3.1.4. At some point during the registration period, all of the disputed domain names redirected to the Complainant's main IBM webpage. While the <apply-ibm.com> and <join-ibm.com> disputed domain names are currently inactive, this creates a real or implied ongoing threat to the Complainant, and such behavior demonstrates bad faith use of the disputed domain names.

Additionally, the Complainant contends that the disputed domain names <explore-ibm.com>, <join-ibm.com>, and <apply-ibm.com> pose cybersecurity threats associated with malware or spam. Additionally, the Respondent connected the disputed domain names to a mail server responsible for sending and accepting email messages on behalf of the disputed domain names. This suggests that the Respondent may have intended to use the disputed domain names for phishing or other fraudulent purposes, such as an employment scam.

The Complainant sent a cease-and-desist letter to the Respondent through the Registrar, asking the Respondent to disable and transfer the disputed domain names to the Complainant. The Respondent's failure to reply to the Complainant's letter is a further showing of bad faith on the Respondent's part.

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 3.1](#), section 1.7.

The Complainant has shown rights in respect of its IBM Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the IBM Trademark is recognizable within each of the disputed domain names. Accordingly, the disputed domain names are 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, "apply-", "explore-", "find-", "hiring-", "join-", and "search-", may bear on assessment of the second and third elements, the Panel finds the addition of such terms to the respective disputed domain names does not prevent a finding of confusing similarity between the disputed domain names 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 names. 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 names such as those enumerated in the Policy or otherwise.

The composition of the disputed domain names naturally creates a likelihood of confusion and association with the Complainant for consumers seeking out information about or employment with the Complainant, which is furthered by the use of the disputed domain names to previously all redirect to the Complainant's website.

The Panel also notes that although the Respondent registered the disputed domain names under the company name "IbmStudio", the Complainant has asserted that the Respondent is not associated with the Complainant, which the Respondent has not disputed. Further, there is no evidence demonstrating that the Respondent is commonly known by that name or disputed domain names.

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 all of the disputed domain names on the same day, many decades after the Complainant acquired trademark rights in its well-known IBM Trademark. The Respondent redirected the disputed domain names <explore-ibm.com>, <find-ibm.com>, <hiring-ibm.com>, and <search-ibm.com> to the Complainant's official webpage, with such redirections still continuing. The disputed domain names <apply-ibm.com> and <join-ibm.com> were previously redirected to the Complainant's official webpage but are currently inactive. However, the Complainant has provided evidence that those inactive disputed domain names are still associated with mail exchange records and likely being used to distribute malware, phishing and/or spam.

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. These circumstances include registrations that incorporate the complainant's mark plus an additional term such as a descriptive term, or one that corresponds to the complainant's area of activity or natural zone of expansion. All of the disputed domain names incorporate the Complainant's well-known IBM Trademark and a descriptive term that would naturally create a likelihood of confusion and association with the Complainant for consumers seeking out information about or employment with the Complainant.

Panels have consistently found that the mere registration of a domain name that is confusingly similar (particularly domain names incorporating a descriptive the mark plus a descriptive term) to a well-known trademark can by itself create a presumption of bad faith. The redirection of the disputed domain names to the Complainant's website is an obvious indicia of the Respondent targeting the Complainant, as well as evidence supporting that the Respondent registered the disputed domain names to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark. [WIPO Overview 3.1](#), section 3.1.4.

The Respondent's contact information is obviously incomplete and likely false, with an email address not matching the Respondent's name, a fake phone number, and an address without a street name listed. These likely false and incomplete contact details are further indicia of bad faith by the Respondent.

Regarding the two inactive disputed domain names, the Panel notes that: the well-known reputation of the Complainant's mark; the prior redirecting use; the composition of these two disputed domain names; and the Respondent's failure to provide a response, support a finding that in the circumstances of this case the passive holding of these two disputed domain names does not prevent a finding of bad faith under the Policy. [WIPO Overview 3.1](#), section 3.3.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names 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 names <apply-ibm.com>, <explore-ibm.com>, <find-ibm.com>, <hiring ibm.com>, <join-ibm.com>, and <search-ibm.com> be transferred to the Complainant.

/Gary Saposnik/

Gary Saposnik

Sole Panelist

Date: September 22, 2026