

ADMINISTRATIVE PANEL DECISION

Meta Platforms, Inc. v. Jeremy Erman
Case No. D2026-3350

1. The Parties

The Complainant is Meta Platforms, Inc., United States of America (“United States”), represented by Hogan Lovells Cadwalader (Paris) LLP, France.

The Respondent is Jeremy Erman, United States.

2. The Domain Name and Registrar

The disputed domain name <metamatesfacebook.com> (the “Disputed Domain Name”) is registered with Wild West Domains, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 28, 2026. On July 29, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On July 31, 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 August 3, 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 on August 4, 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 August 6, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 26, 2026. The Respondent sent email communications to the Center between August 8, 2026 and September 2, 2026, in which, among other things, it requested an extension of

time to file a Response, consented to the transfer of the Disputed Domain Name, and requested that its name be redacted from the Decision.

The Center appointed Lynda M. Braun as the sole panelist in this matter on September 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.

The Respondent was granted a four-day extension of time to file a Response, as permitted under the Rules. The Panel has not redacted the name of the Respondent in this case. Paragraph 4(j) of the Policy provides that all decisions shall be published in full on the Internet unless an administrative panel determines that exceptional circumstances warrant redaction. Here, the Respondent does not claim that it did not register the Disputed Domain Name, that it was the victim of identity theft, or that any comparable circumstances exist. Accordingly, the Panel finds no basis for name redaction and rejects the Respondent's request.

4. Factual Background

The Complainant is a United States social technology company with its principal place of business in Menlo Park, California, United States, and operates, inter alia, Facebook, Instagram, Meta Quest (formerly Oculus) and WhatsApp. The Complainant's focus is to help people connect, find communities and grow businesses.

The Complainant (formerly Facebook, Inc.) is the owner of numerous trademarks, including, but not limited to: FACEBOOK, United States Registration No. 3,734,637, registered on January 5, 2010; FACEBOOK, European Union Trade Mark No. 005585518, registered on May 25, 2011; META, Andorran Trademark Registration No. 43626, registered on January 3, 2022; and META, Monegasque Trademark Registration No. 2200039, registered on February 8, 2022 (hereinafter collectively referred to as the "META and FACEBOOK Marks").

The Complainant owns and operates numerous domain names relating to its META and FACEBOOK Marks. Given the exclusive online nature of the Complainant's social networking business, the Complainant's domain names consisting of its various trademarks are not only the heart of its entire business but also the principal way for millions of users to avail themselves of its services. The Complainant has thus made substantial investments to develop a strong presence online by being active on various social media platforms. For example, the Complainant's official page on Facebook has over 106 million followers and the Complainant has 9.8 million followers on X (formerly Twitter).

At a company meeting on February 15, 2022, the Complainant's founder and chief executive announced a new name for the Complainant's employees: Metamates. This new name for the Complainant's employees as "Metamates" was published on the same day in articles by The New York Times (United States) and Business Insider.

The Disputed Domain Name was registered on February 18, 2022, three days after it was publicized that the name for the Complainant's employees would be "Metamates". The Disputed Domain Name resolves to a landing page with pay-per-click ("PPC") hyperlinks, which hyperlinks directly referring to the Complainant's marks and services.

On June 24, 2026, the Complainant's lawyers, in an attempt to resolve the matter amicably, submitted a notice via the Registrar's registrant contact form, but no response to such notice seems to have been received according to the available record.

In email communications following receipt of the Complaint in this proceeding, the Respondent contested the Complainant's allegations, while also agreeing to transfer the Disputed Domain Name to the Complainant. The Complainant, however, requested that the Center proceed to a full Decision.

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 presence of the META and FACEBOOK Marks in the Disputed Domain Name is sufficient to establish confusing similarity between the Disputed Domain Name and the Complainant's trademarks;
- the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name because, among other things, the Disputed Domain Name resolves to a landing page that contains PPC third-party sponsored hyperlinks; and
- the Disputed Domain Name was registered and is being used in bad faith since, among other things, the Disputed Domain Name resolves to a PPC landing page where the Respondent intentionally attempted to attract, for commercial gain, Internet users to such landing page, by creating a likelihood of confusion with the Complainant's META and FACEBOOK Marks.

The Complainant seeks the transfer of the Disputed Domain Name from the Respondent to the Complainant in accordance with paragraph 4(i) of the Policy.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy requires that the Complainant prove the following three elements in order to prevail in this proceeding:

- (i) the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and
- (iii) the Disputed Domain Name was registered and is being used in bad faith.

A. Identical or Confusingly Similar

Paragraph 4(a)(i) of the Policy requires a two-fold inquiry: a threshold investigation into whether a complainant has rights in a trademark, followed by an assessment of whether the disputed domain name is identical or confusingly similar to that trademark. The Panel concludes that in the present case, the Disputed Domain Name is confusingly similar to the META and FACEBOOK Marks, differing only by the addition of the term "mates" after the META trademark, followed by the generic Top-Level Domain ("gTLD") ".com".

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. See WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 1.7.

It is uncontroverted that the Complainant has established rights in the META and FACEBOOK Marks based on its registered trademarks for the META and FACEBOOK Marks in the United States and other jurisdictions worldwide. The registration of a mark satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case. As stated in section 1.2.1 of the [WIPO Overview 3.1](#), “[w]here the complainant holds a nationally or regionally registered trademark or service mark, this prima facie satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case”. The Respondent has not rebutted this presumption, and therefore the Panel finds that the Complainant has rights in the META and FACEBOOK Marks. Thus, the Panel finds that the Complainant satisfied the threshold requirement of having trademark rights in the META and FACEBOOK Marks.

The Disputed Domain Name incorporates the META and FACEBOOK Marks in their entirety, adding the term “mates” to the META trademark and then followed by the gTLD “.com”. The test for confusing similarity involves a side-by-side comparison of the domain name and the textual components of the relevant trademark to assess whether the mark is recognizable within the disputed domain name. Here, the META and FACEBOOK Marks are recognizable within the Disputed Domain Name. As stated in section 1.8 of [WIPO Overview 3.1](#), “where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive . . . or otherwise) would not prevent a finding of confusing similarity under the first element”. Thus, the addition of the term “mates” to the META trademark in the Disputed Domain Name does not prevent a finding of confusing similarity. See *BHP Billiton Innovation Pty Ltd v. Oloyi*, WIPO Case No. [D2017-0284](#).

Further, the addition of a gTLD such as “.com” in a domain name is a technical requirement. As such, it is well established that a gTLD may typically be disregarded when assessing whether a disputed domain name is identical or confusingly similar to a trademark. See *Proactiva Medio Ambiente, S.A. v. Proactiva*, WIPO Case No. [D2012-0182](#), and [WIPO Overview 3.1](#), section 1.11.1. Thus, the Panel finds that the Disputed Domain Name is confusingly similar to the Complainant’s META and FACEBOOK Marks.

Based on the available record, the Panel finds that 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.

In this case, given the facts as set out above, the Panel finds that the Complainant has made out a prima facie case that the Respondent lacks rights or legitimate interests. Although the Respondent has claimed it considered using the Disputed Domain Name in association with a “satirical website, something that would have nothing to do with Facebook and Meta”, it acknowledged that it did not take any action to pursue such plans, nor did it provide any supporting evidence of such claim. The Panel finds that the Respondent has failed to rebut the Complainant’s prima facie case. Furthermore, the Complainant has not authorized, licensed, or otherwise permitted the Respondent to use the META and FACEBOOK Marks. Nor does the Complainant have any type of business relationship with the Respondent. There is also no evidence that the Respondent is commonly known by the Disputed Domain Name or by any similar name, nor any evidence that the Respondent was using or making demonstrable preparations to use the Disputed Domain Name in connection with a bona fide offering of goods or services. See Policy, paragraph 4(c).

Further, as noted above, the Disputed Domain Name resolves to a landing page displaying PPC links directly referencing the Complainant.¹ Panels have found that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant's mark or otherwise mislead Internet users. As such, the Respondent's registration and use of the Disputed Domain Name does not amount to a legitimate noncommercial use within the meaning of paragraph 4(c)(iii) of the Policy.

The Panel also concludes that the use of the Disputed Domain Name does not constitute fair use. A core factor in assessing whether the Respondent's use of a domain name is fair is whether it falsely suggests affiliation with the trademark owner. Prior UDRP panels have found that where a domain name consists of a trademark together with an additional term, 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. In this case, the Disputed Domain Name incorporates the Complainant's META and FACEBOOK Marks, with the META Mark followed by the term "mates". As detailed above, the Respondent registered the Disputed Domain Name three days after the Complainant's "Metamates" announcement was published. Therefore, the Disputed Domain Name carries a risk of implied affiliation and is likely to be read as referring directly to the Complainant and does not constitute fair use.

Based on the available record, the Panel finds that 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. 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 Panel finds that the Respondent had actual knowledge of the Complainant and its rights in the META and FACEBOOK Marks when registering the Disputed Domain Name, emblematic of bad faith registration and use. It strains credulity to believe that the Respondent did not know of the Complainant or its well-known META and FACEBOOK Marks as evidenced by the Respondent's use of the META and FACEBOOK Marks, as well as the META trademark, followed by the term "mates", in the Disputed Domain Name. Thus, the Panel finds that in the present case, the Respondent had the Complainant's META and FACEBOOK Marks in mind when registering and using the Disputed Domain Name.

Moreover, the Disputed Domain Name resolves to a landing page displaying PPC links directly referencing the Complainant and the Panel infers that the Respondent derives a financial benefit in the form of click-through revenue from the presence of such links on the website to which the Disputed Domain Name resolves. Although the Panel notes the Respondent's assertion indicating that it was not responsible for such PPC links, it cannot disclaim responsibility for content appearing on the website. The hypothesis that such links or content could have been generated by a third party, such as a registrar or auction platform (or their affiliate), or the fact that the respondent itself may not have directly profited would not by itself prevent a finding of bad faith. [WIPO Overview 3.1](#), section 3.5. That being said, and regardless of whether the Respondent is generating click-through revenue, the Panel finds that the Respondent has registered and used the Disputed Domain Name to target the Complainant and its well-known marks, foreseeing some sort of commercial advantage. The timing of registration of the Disputed Domain Name, three days after the Complainant had announced the name "Metamates" for its employees, supports such finding. The Panel finds that the Respondent registered and used the Disputed Domain Name in an attempt to attract, for commercial gain, Internet users to its landing page, by creating a likelihood of confusion with the Complainant's META and FACEBOOK Marks as to the source, sponsorship, affiliation, or endorsement of

¹ The Complainant submitted a screenshot of the landing page containing the PPC links as an Annex to the Complaint.

the Disputed Domain Name, in bad faith pursuant to paragraph 4(b)(iv) of the Policy.

Based on the available record, the Panel finds that 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 <metamatesfacebook.com> be transferred to the Complainant.

/Lynda M. Braun/

Lynda M. Braun

Sole Panelist

Date: September 16, 2026

ADDENDUM TO ADMINISTRATIVE PANEL DECISION

This is an addendum to the Administrative Panel Decision ("Decision") dated September 16, 2026 with regard to the disputed domain name <metamatesfacebook.com>. The Panel wishes to issue the following clarifications.

5. Parties' Contentions

B. Respondent

In the Decision when discussing the Respondent's contentions, the Panel states: "The Respondent did not reply to the Complainant's contentions." The Panel notes that the Respondent has sent email communications to the Center between August 8, 2026 and September 2, 2026. Specifically, in its communication of August 26, 2026, the Respondent stated:

"[REDACTED]. I registered a bunch of domain names in 2022 mostly for fun (mostly art and music related, nothing the Complainant would be interested in). I registered the domain name in question on a lark, thinking that any available domain names were first come, first serve, and that no one could object to the registration as long as I did nothing with it. I briefly considered creating a satirical website, something that would have nothing to do with Facebook and Meta and make no money, but never did anything with the idea. [REDACTED], I also didn't want to put anything online unless I was sure it was fair use and didn't infringe on anyone's trademarks or copyrights.

I have never monetized a single domain name or attempted to profit from them. [REDACTED].

[REDACTED]."

In a further email communication of August 31, 2026, the Respondent stated, amongst other things:

"The Complaint accuses me of using the domain name in 'bad faith' by putting PPC links on a lander and attempting to make money from the domain name. This is completely false. I never did this, do not know how to do this, have never tried to monetize a domain name in my life, and had no knowledge this might be happening before the Complainant suggested it.

The Complainant says the only reason I registered the domain name was to make money off the Complainant's trademarks. As I think I said in a previous message, I thought the name might make a funny satirical website. I never intended to make money off the name. If I had put up a website, it would have been a non-commercial site with no links to anything else.

I did not think anyone would care or even know I had registered a domain name if I didn't do anything with it. I was careful not to do anything with it, which the Complainant ironically seems to see as bad faith.

The Complaint accuses me of 'bad faith' because my personal information is redacted online by a proxy service. This is a misleading complaint. My personal information was redacted because that is currently the required default option for virtually all domain names registered worldwide. This is because of legislation passed by the EU, and subsequently adopted worldwide so that all registrations would follow the same standards. [REDACTED]."

The Panel confirms that it received the Respondent's email communications before issuing the Decision. Although the Decision addressed the Respondent's contentions in the text of the Decision, it did not expressly summarize them in the section entitled "Respondent's Contentions". The Panel nevertheless confirms that it considered those contentions in preparing the Decision.

The Panel, however, has considered that the Respondent's contentions do not change the Panel's findings, as discussed in the Decision. Notably, the Panel finds that although the Respondent has claimed it considered using the Disputed Domain Name in association with a "satirical website, something that would have nothing to do with Facebook and Meta", the Respondent acknowledged that it did not take any action to pursue such plans, nor did it provide any supporting evidence of such claim, and as such, the Respondent's contention do not rebut the Complainant's prima facie showing under the second element. Moreover, and as the Panel explained in the Decision, the timing of registration of the Disputed Domain Name, only three days after the Complainant had announced the name "Metamates" for its employees, supports a finding of registration in bad faith with intent of targeting of the Complainant and rather makes the Respondent's claim that it registered the Disputed Domain Name "mostly for fun", without the Complainant's trademarks in mind, rather unlikely.

As to the allegation that the Respondent "never monetized a single domain name or attempted to profit from them", when referring to the PPC links displayed in the Disputed Domain Name, the Panel reiterates that the Respondent cannot disclaim responsibility for content appearing on the website, pursuant to section 3.5 of the [WIPO Overview 3.1](#).

7. Decision

The Panel reaffirms the Decision in favor of the Complainant, and for the reasons described above, the Panel notes that the notification of this Addendum does not alter the calculation of the ten (10) business day period reflected under paragraph 4(k) of the Policy.

For avoidance of doubt, the Panel restates paragraph 7 of its Decision as follows:

"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 <metamatesfacebook.com> be transferred to the Complainant."

/Lynda M. Braun/

Lynda M. Braun

Sole Panelist

Date: September 21, 2026