

ADMINISTRATIVE PANEL DECISION

Project Management Institute, Inc. v. scott mahoney, careers pmi
Case No. DCO 2025-0095

1. The Parties

Complainant is Project Management Institute, Inc. United States of America (“United States”), represented by Roche Pia LLC, United States.

Respondent is scott mahoney, careers pmi, United States.

2. The Domain Name and Registrar

The disputed domain name <careerspmi.co> is registered with Key-Systems GmbH (“Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (“Center”) on November 14, 2025. On November 17, 2025, the Center transmitted by email to Registrar a request for registrar verification in connection with the disputed domain name. On November 18, 2025, Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name that differed from that in the Complaint (e.g., the Complaint named Redacted for Privacy, c/o whoisproxy.com as Respondent). The Center sent an email communication to Complainant on November 26, 2025, providing the registrant and contact information disclosed by Registrar and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on November 26, 2025 naming “scott mahoney, careers pmi” as Respondent.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (“Policy”), the Rules for Uniform Domain Name Dispute Resolution Policy (“Rules”), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (“Supplemental Rules”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified Respondent of the Complaint, and the proceedings commenced on November 28, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 18, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on December 22, 2025.

The Center appointed Debra J. Stanek as the sole panelist in this matter on December 26, 2025. 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

Complainant is a United States-based not for profit corporation engaged in advocacy, networking, education, research in the field of project management. It owns several United States registrations for the PMI mark, including:

- Reg. No. 2,152,599 for a variety of printed matter relating to project management and association services, registered April 21, 1998;
- Reg. No. 4,077,281 for association services, registered December 27, 2011; and
- Reg. No. 4,303,806 for educational services, registered March 19, 2013.

The disputed domain name was registered December 6, 2024.

At the time of this decision, the disputed domain name does not lead to an active website, instead, an “under construction” message is displayed. According to the Complaint, Respondent has used the disputed domain name in an email address used to send email messages that purport to be from Complainant concerning employment with Complainant.

5. Parties’ Contentions

A. Complainant

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

In particular:

- The disputed domain name consists of Complainant’s mark and the term “careers.”
- Based on the information available to Complainant, Respondent has no rights or legitimate interests in the name PMI. Complainant’s search of business filings in Arizona (the state of Respondent’s address), did not disclose any registered business under the name “careers pmi;”
- Respondent is using the disputed domain name to engage in fraud. Specifically, the Complaint includes copies of communications with a third party sent using an email address that includes the disputed domain name. The signature block includes Complainant’s logo and the designation “Human Resources.” The messages refer to an employment opportunity and, among other things, invite the recipient to complete a screening questionnaire and eventually offer the recipient employment.

B. Respondent

Respondent did not reply to Complainant’s contentions.

6. Discussion and Findings

To prevail under the Policy a complainant must prove, as to the domain name at issue, that: (a) it is identical or confusingly similar to a mark in which the complainant has rights, (b) respondent has no rights or legitimate interests in respect to it, and (c) it has been registered and is being used in bad faith. Policy, paragraph 4(a). A respondent's failure to respond does not automatically result in a finding for the complainant; the complainant continues to have the burden of establishing each element. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.0"), section 4.3. The Panel may, however, draw appropriate inferences from the default. See Rules, paragraph 14(b).

The Panel determines that "scott mahoney, careers pmi" is the appropriate Respondent. See [WIPO Overview 3.0](#), section 4.4.5 (in cases involving a privacy service, panels have discretion to determine appropriate respondent).

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 Complainant's trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

Complainant's mark is not identical to the disputed domain name. However, the entire mark is reproduced within the disputed domain name following the term "careers." Despite the addition of "careers," the Panel finds the mark is recognizable within the disputed domain name. Although this addition may bear on assessment of the second and third elements, the Panel finds it does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), 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 Respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof in proceedings under the Policy is on the complainant, panels have recognized that proving 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 remains on the complainant). If the respondent fails to come forward with relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

The Panel finds Complainant has established a *prima facie* case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted 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. Further, Complainant has provided credible evidence that Respondent used the disputed domain name to impersonate Complainant in communicating with candidates seeking employment. Consistent with determinations by other panels, the Panel finds that such a use does not confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), 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. The list in paragraph 4(b) is not exhaustive; other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

Here, Complainant's evidence shows that Respondent used the disputed domain name to pass itself off as Complainant in communicating with a third party as part of a fraudulent scheme. In addition, Respondent did not respond to the Complaint and concealed its identity in the publicly-available Whois.

Under these circumstances, the Panel finds Respondent's registration and use of the disputed domain name constitute bad faith under the Policy.

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 <careerspmi.co> be transferred to Complainant.

/Debra J. Stanek/

Debra J. Stanek

Sole Panelist

Date: January 9, 2026