

UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY COMPLAINT

1. Introduction

This Complaint is submitted in accordance with the Uniform Domain Name Dispute Resolution Policy (the [Policy](#)), approved by the Internet Corporation for Assigned Names and Numbers (**ICANN**), the Rules for Uniform Domain Name Dispute Resolution Policy (the [Rules](#)), approved by ICANN, and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the [Supplemental Rules](#)).

2. The Parties

2.1. Complainant

Complainant:

Complainant's contact details:

Complainant's authorized representative:

Authorized representative details:

Authorized representative is the preferred contact.

2.2. Respondent

Respondent:

Respondent's and/or Respondent's authorized representative's contact details (if known):

See [Q&A: domain name registrant data and the UDRP](#).

3. The Domain Name(s) and Registrar(s)

Domain Name(s):

Registrar(s):

Confirm the domain name(s) is(are) active and not expired. See [Q&A: domain name expiry and the UDRP](#).

4. Language of Proceedings

Language of the Complaint:

Language of the Registration Agreement:

Arguments for different Language of the Complaint than Registration Agreement:

See [Q&A: language of proceedings and the UDRP webpage](#).

5. Factual and Legal Grounds

Relevant Background

Legal Grounds

5.1. The domain name(s) is(are) identical or confusingly similar to a trademark or service mark in which the Complainant has rights

The Complainant has registered trademark rights (please include registration number below).

The Complainant has unregistered trademark rights (please include evidence of use as a source identifier in an annex and describe below).

The disputed domain name is identical or confusingly similar to the Complainant's trademark(s).

5.2. The Respondent has no rights or legitimate interests in respect of the domain name(s)

Before any notice of the dispute, the Respondent did not use, or make demonstrable preparations to use, the domain name in connection with a bona fide offering of goods or services.

The Respondent is not commonly known by the domain name.

The Respondent is not making legitimate noncommercial or fair use of the domain name.

5.3. The domain name(s) was/were both: 1) registered in bad faith, and 2) is/are being used in bad faith

The Respondent registered the domain name to sell it to the Complainant or a competitor of the Complainant, for valuable consideration in excess of its out-of-pocket costs.

The Respondent registered the domain name in order to prevent the Complainant from reflecting the mark in a corresponding domain name (and has engaged in a pattern of such conduct).

The Respondent registered the domain name primarily for the purpose of disrupting the business of a competitor.

The Respondent intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the Complainant's mark(s) as to the source, sponsorship, affiliation, or endorsement of its website or other online location.

6. Remedies Requested

Remedy:

7. Administrative Panel

Panel:

For a three-member Panel, the Complainant's preferred panelists in order of preference are:

- 1.
- 2.
- 3.

8. Payment

Payment made via [WIPO Pay](#).

Payment amount (USD):

Payment method:

9. Mutual Jurisdiction

Complainant will submit to the jurisdiction of the courts at (choose one or both):

“the location of the principal office of the concerned registrar”;

“the domain name holder’s address, as shown for the registration of the domain name(s) in the concerned registrar’s Registration Data at the time of the submission of the Complaint to the Center.”

10. Other Legal Proceedings

11. Communications

Complaint sent to concerned Registrar(s) on:

12. List of Annexes

13. Certification

The Complainant agrees that its claims and remedies concerning the registration of the domain name(s), the dispute, or the dispute’s resolution shall be solely against the domain name holder and waives all such claims and remedies against (a) the WIPO Arbitration and Mediation Center and Panelists, except in the case of deliberate wrongdoing, (b) the concerned registrar(s), (c) the registry administrator, (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

The Complainant certifies that the information contained in this Complaint is to the best of the Complainant’s knowledge complete and accurate, that this Complaint is not being presented for any improper purpose, such as to harass, and that the assertions in this Complaint are warranted under the Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Signature:

Date:

COMPLAINT TRANSMITTAL COVERSHEET

Attached is a Complaint that has been filed against you with the World Intellectual Property Organization (**WIPO**) Arbitration and Mediation Center (the **Center**) pursuant to the Uniform Domain Name Dispute Resolution Policy (the **Policy**) approved by the Internet Corporation for Assigned Names and Numbers (**ICANN**), the Rules for Uniform Domain Name Dispute Resolution Policy (the **Rules**) approved by ICANN, and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the **Supplemental Rules**).

The Policy is incorporated by reference into your Registration Agreement with the Registrar(s) of your domain name(s), in accordance with which you are required to submit to a mandatory administrative proceeding in the event that a third party (a **Complainant**) submits a complaint to the Center, concerning a domain name that you have registered. You will find the name and contact details of the Complainant, as well as the domain name(s) that is/are the subject of the Complaint in the Complaint that accompanies this Coversheet.

Once the Center has checked the Complaint to determine that it satisfies the formal requirements of the Policy, the Rules, and the Supplemental Rules, it will forward a copy of the Complaint, including annexes, to you by email as well as sending you hardcopy Written Notice by post and/or facsimile. You will then have 20 calendar days from the date of Commencement within which to submit your Response. You may request an automatic extension of 4 calendar days. You may represent yourself or seek the assistance of legal counsel to represent you in the administrative proceeding.

- The **Policy** can be found at:
<https://www.icann.org/resources/pages/policy-2024-02-21-en>
- The **Rules** can be found at:
<https://www.icann.org/resources/pages/udrp-rules-2024-02-21-en>
- The **Supplemental Rules**, as well as other information concerning the resolution of domain name disputes can be found at:
<https://www.wipo.int/amc/en/domains/supplemental/eudrp/newrules.html>
- A **model Response** can be found at: <https://www.wipo.int/amc/en/domains/respondent/index.html>
- WIPO's **Data Privacy Notice** can be found at: <https://www.wipo.int/web/privacy-policy>

Alternatively, you may contact the Center to obtain any of the above documents. The Center can be contacted in Geneva, Switzerland by email at domain.disputes@wipo.int.

You are kindly requested to contact the Center to provide any alternate email address to which you would like (a) the Complaint, including Annexes and (b) other communications in the administrative proceeding to be sent.

A copy of this Complaint has also been sent to the Registrar(s) with which the domain name(s) that is/are the subject of the Complaint is/are registered.

By submitting this Complaint to the Center the Complainant hereby agrees to abide and be bound by the provisions of the Policy, Rules, Supplemental Rules, and the WIPO Data Privacy Notice.