

ADMINISTRATIVE PANEL DECISION

Fenix International Limited v. Privacy Services Provided by Withheld for Privacy ehf / Nemanja Krecelj, Eloo.Media Limited; Nemanja Krecelj, Rocket Science Group; and Not Want
Case No. D2022-1709

1. The Parties

The Complainant is Fenix International Limited, c/o Walters Law Group, United States of America (“United States”).

The Respondents are Privacy Services Provided by Withheld for Privacy ehf, Iceland / Nemanja Krecelj, Eloo.Media Limited, Ireland; Nemanja Krecelj, Rocket Science Group, Bosnia and Herzegovina; and Not Want, United States.

2. The Domain Names and Registrar

The disputed domain names <fansleaked.me>, <fofleaks.com>, <latestofleaks.com>, and <leaksfans.com> are registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 10, 2022. On May 11, 2022, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On May 11, 2022, 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 and contact information in the Complaint. The Center sent an email communication to the Complainant on May 12, 2022 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 May 13, 2022.

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 Respondents of the Complaint, and the proceedings commenced on June 1, 2022. In accordance with the Rules, paragraph 5,

the due date for Response was June 21, 2022. The Respondents did not submit any Response. Accordingly, the Center notified the Respondent's default on June 23, 2022.

The Center appointed Kiyoshi Tsuru as the sole panelist in this matter on July 14, 2022. 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.

3.1. Preliminary Issue: Consolidation

Consolidation of multiple respondents, and multiple domain names may be appropriate, under paragraphs 3(c) and 10(e) of the Rules, even when differently named domain name registrants are involved, where the particular circumstances of a given case indicate that common control is being exercised over the disputed domain names.

In accordance with the information provided by the relevant Registrar, the Registrants of the disputed domain names are as follows:

- <fansleaked.me>, Nemanja Krecelj, Eloo.Media Limited;
- <fofleaks.com>, Nemanja Krecelj, Rocket Science Group;
- <latestofleaks.com>, Nemanja Krecelj, Rocket Science Group; and
- <leaksfans.com>, Not Want.

The Complainant has requested to consolidate multiple domain names owned by different registrants in the same proceeding, alleging that the disputed domain names appear to be subject to common control.

In particular, the Complainant argued the following:

- i) That the disputed domain names are substantially similar.
- ii) That the disputed domain names were registered around the same time.
- iii) That the websites to which the disputed domain names resolve have very similar layout and content.
- iv) That the websites to which the disputed domain names resolve have the same fonts or logos.
- v) That the disputed domain names were registered with the same Registrar, under a privacy service.



Moreover, the Panel notes that the registration details for three of the disputed domain names incorporate the registrant name "Nemanja Krecelj" and the registrant name of the final disputed domain name does not appear to correlate to an actual entity, such as an individual, group, or company.

Taking the above into account, and pursuant to paragraph 10(e) of the Rules, and considering that the Complainant has made a *prima facie* case that the disputed domain names are subject to common control, and the Panel finds consolidation would be fair and equitable to all Parties, this Panel decides to consolidate the four disputed domain names contained in the Complaint, in order to maintain the spirit of the Policy, which is to make available to the parties a simple, cost-effective, and expeditious procedure (see section 4.11.2 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"); see also *BMW v. Mike Lee et al.*, WIPO Case No. [D2016-2268](#), and *Speedo Holdings B.V. v. Programmer, Miss Kathy Beckerson, John Smitt, Matthew Simmons*, WIPO Case No. [D2010-0281](#)).

4. Factual Background

The Complainant owns and operates the website to which the domain name <onlyfans.com> resolves, and which is used as a social media platform that allows users to post and subscribe to audiovisual content.

The Complainant is the owner of several trademark registrations around the world, among others, the following:

Trademark	No. Registration	Jurisdiction	Date of Registration	International Classes
ONLYFANS 	017946559	European Union	January 9, 2019	9, 35, 38, 41, and 42
ONLYFANS	0917912377	European Union	January 9, 2019	9, 35, 38, 41, and 42
ONLYFANS 	UK00917946559	United Kingdom	January 9, 2019	9, 35, 38, 41, and 42
ONLYFANS	UK00917912377	United Kingdom	January 9, 2019	9, 35, 38, 41, and 42
ONLYFANS	5769267	United States	June 4, 2019	35
ONLYFANS.COM	5769268	United States	June 4, 2019	35
ONLYFANS	6253455	United States	January 26, 2021	9, 35, 38, 41, and 42
ONLYFANS 	6253475	United States	January 26, 2021	9, 35, 38, 41, and 42
ONLYFANS	1507723	International Registration	November 2, 2019	9, 35, 38, 41, and 42
ONLYFANS 	1509110	International Registration	November 2, 2019	9, 35, 38, 41, and 42

The disputed domain name <fansleaked.me> was registered on August 24, 2021, <fofleaks.com> on July 3, 2021, <latestofleaks.com> on July 3, 2021, and <leaksfans.com> on August 6, 2021. The Complainant provided evidence that the disputed domain names resolved to websites referencing the Complainant's ONLYFANS trademark displaying audiovisual content claimed to be from the Complainant's website.

5. Parties' Contentions

A. Complainant

The Complainant has requested, aware of the possible consequences, that the Administrative Panel appointed in this administrative proceeding order that the disputed domain names be cancelled.

The Complainant argued the following:

That, in 2022, the Complainant's website to which the domain name <onlyfans.com> resolves has been recognized as one of the most popular websites in the world. That, according to Alexa Internet, it is the 177th, most popular website on the Internet, and the 75th most popular website in the United States.

That, since the website to which the domain name <onlyfans.com> resolves is one of the most visited websites in the world, it has become a prime target for cybersquatters wishing to profit from the goodwill that the Complainant has gained.

I. Identical or Confusingly Similar

That the disputed domain names are identical or confusingly similar to the Complainant's trademarks.

That it is well established that the mere abbreviation of a trademark, or a portion thereof, is not enough to prevent confusing similarity.

That the use of the abbreviation "of" and the "fans" portion of the Complainant's trademark in the disputed domain names, does not prevent a finding of confusing similarity.

That the abbreviation "of" is a common abbreviation of the ONLYFANS trademark, and that it is clear that the Respondents are impersonating the Complainant.

That the disputed domain names <fansleaked.com> and <leaksfans.com> contain the term "fans" which is a portion of the Complainant's trademark ONLYFANS.

That on the websites to which the disputed domain names resolve there are several references to the Complainant's trademark.

That the disputed domain names consist of the abbreviation or a portion of the Complainant's trademark, with the insertion of the additional terms "latest", "leaked," and "leaks", or the letter "f", which does nothing to avoid confusing similarity.

That the use of the ".com" and ".me" Top-Level Domains ("TLDs") does not change the result in the confusing similarity analysis, since they do not sufficiently distinguish the disputed domain names from the Complainant's trademark.

II. Rights or Legitimate Interests

That the Respondents have no connection to or affiliation with the Complainant, and that the Respondents have not received any authorization, license, or consent to use the trademark in the disputed domain names, or in any other manner.

That the Respondents are not commonly known by the trademark ONLYFANS and do not hold any trademark rights to the disputed domain names.

That the Complainant has achieved global fame and success in a short time, which makes it clear that the Respondents knew of the Complainant's trademark and knew that they had no rights to, or legitimate

interests in the disputed domain names.

That there is no evidence indicating that the Respondents are known by the text of the disputed domain names.

That once a complainant asserts that a respondent has no rights or legitimate interests, the burden of production then shifts to the respondent to provide concrete evidence showing rights to, or legitimate interests in the disputed domain name at hand. That the Respondents will be unable to provide credible evidence that they have rights to, or legitimate interests in the disputed domain names.

That the registration and use of the disputed domain names in bad faith cannot establish rights to or legitimate interests in favor of the Respondents.

That the Respondents cannot claim a right to use the disputed domain names under fair use, since they include the Complainant's trademark and the additional terms such as "leaked" and "leaks", which creates a risk of implied affiliation.

That using the disputed domain names to host commercial websites that advertise goods and services in direct competition with the Complainant does not constitute legitimate rights or interests.

That the disputed domain names currently resolve to websites that offer stolen content from the Complainant's users. That, therefore, the Respondents' use of the disputed domain names to offer illegal services is not a *bona fide* offering of goods or service.

That the Respondents registered and used the disputed domain names not because they refer to, or are associated with the Respondents, but because the disputed domain names are identical or confusingly similar to the <onlyfans.com> domain name and the trademarks used by the Complainant in association with its services.

III. Registered and Used in Bad Faith

a) Registered in Bad Faith

That the disputed domain names were registered on July 3, 2021, August 6, 2021, and August 24, 2021, long after the Complainant secured registered rights to the trademark ONLYFANS, and long after the Complainant had acquired common law rights to said trademarks, which have acquired distinctiveness. That this acquired distinctiveness is so strong that the Complainant's website is among the Top 250 most popular websites in the world.

That previous UDRP panels have found that the registration of a domain name that is confusingly similar to a widely-known trademark may create a presumption of bad faith.

That the Complainant's trademark ONLYFANS has been recognized in numerous previous cases decided under the Policy as "internationally well-known amongst the relevant public", such that the Respondents either knew or ought to have known of the Complainant's trademark, and likely registered the disputed domain names to target said trademark.

That bad faith registration has also been found when a disputed domain name includes part of a complainant's trademark or an abbreviation of it plus an additional term that "enhances the likelihood of confusion with the Complainant", such as the Respondents' use of the Complainant's trademark plus the additional terms such as "leaked and "leaks".

That, under the Policy, registration in bad faith is found when a respondent has engaged in a pattern of registering infringing domain names.

That the Respondents registered the disputed domain names to offer services in direct competition with the Complainant (including content pirated from the Complainant's users).

That the Complainant sent a cease-and-desist letter to the Respondents on March 10, 2022, demanding that they stop using and cancel the disputed domain names, but that the Respondents did not reply, which is further evidence of bad faith.

That the Respondents hid from the public behind a Whois privacy wall, which is additional evidence of bad faith registration.

That the Respondents registered the disputed domain names to divert Internet traffic from the Complainant's website to a website offering adult entertainment content (including content pirated from the Complainant's users), in direct competition with the Complainant's website.

b) Used in Bad Faith

That use in bad faith is found where a disputed domain name directs users to a commercial website that offers goods and services in direct competition with the trademark owner.

That the Respondents' attempts to attract, for commercial gain, Internet users to the Respondents' websites by creating a likelihood of confusion with the Complainant's trademark as to the source, affiliation, or endorsement of the disputed domain names, constitutes bad faith use.

B. Respondent

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

6. Discussion and Findings

In accordance with paragraph 4(a) of the Policy, the Complainant is required to prove that each of the three following elements is satisfied:

- (i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondents have no rights or legitimate interests in respect of the disputed domain names; and
- (iii) the disputed domain names were registered and are being used in bad faith.

Given the Respondents' failure to submit a formal Response, the Panel may decide this proceeding based on the Complainant's undisputed factual allegations under paragraphs 5(f), 14(a), and 15(a) of the Rules, (see *Joseph Phelps Vineyards LLC v. NOLDC, Inc., Alternative Identity, Inc., and Kentech*, WIPO Case No. [D2006-0292](#)).

A. Identical or Confusingly Similar

The Complainant has filed evidence showing that it owns registrations for the trademark ONLYFANS, among others, in the United States, the European Union, the United Kingdom, and International registrations designating, *inter alia*, Bosnia and Herzegovina.

A.1. <fansleaked.me>

This disputed domain name is confusingly similar to the Complainant's trademark ONLYFANS, as it incorporates the term "fans" which is an important part of the mentioned trademark, with the addition of the

term “leaked”. Previous panels appointed under the Policy have found that the addition of a term to a disputed domain name, such as “leaked”, does not avoid a finding of confusing similarity (see sections 1.7 and 1.8 of the [WIPO Overview 3.0](#), see also *Fenix International Limited v. Withheld for Privacy Purposes, Privacy Service Provided by Withheld for Privacy ehf / Marius Pop*, WIPO Case No. [D2021-2715](#); *Fenix International Limited c/o Walters Law Group v. Marius*, WIPO Case No. [D2021-1340](#), and *Fenix International Limited c/o Walters Law Group v. Dilshan Omantha*, WIPO Case No. [DCC2021-0002](#)).

A.2. <fofleaks.com>

This disputed domain name is confusingly similar to the Complainant’s trademark ONLYFANS, as it incorporates the abbreviation “of” (*i.e.* a common abbreviation of the trademark ONLYFANS), with the addition of the term “leaks” and the letter “f”. Previous panels appointed under the Policy have found that the addition of a term to a disputed domain name, such as “leaks” and “f”, does not avoid a finding of confusing similarity (see sections 1.7 and 1.8 of the [WIPO Overview 3.0](#), see also *Fenix International Limited v. Withheld for Privacy Purposes, Privacy Service Provided by Withheld for Privacy ehf / Marius Pop*, *supra*; *Fenix International Limited c/o Walters Law Group v. Marius*, *supra*, and *Fenix International Limited c/o Walters Law Group v. Dilshan Omantha*, *supra*).

A.3. <latestofleaks.com>

This disputed domain name is confusingly similar to the Complainant’s trademark ONLYFANS, as it incorporates the abbreviation “of” (*i.e.* a common abbreviation of the trademark ONLYFANS), with the addition of the terms “leaks” and “latest”. Previous panels appointed under the Policy have found that the addition of a term to a disputed domain name, such as “leaks” and “latest”, does not avoid a finding of confusing similarity (see sections 1.7 and 1.8 of the [WIPO Overview 3.0](#), see also *Fenix International Limited v. Withheld for Privacy Purposes, Privacy Service Provided by Withheld for Privacy ehf / Marius Pop*, *supra*; *Fenix International Limited c/o Walters Law Group v. Marius*, *supra*, and *Fenix International Limited c/o Walters Law Group v. Dilshan Omantha*, *supra*).

A.4. <leaksfans.com>

This disputed domain name is confusingly similar to the Complainant’s trademark ONLYFANS, as it incorporates the term “fans” which is an important part of the mentioned trademark, with the addition of the term “leaks”. Previous panels appointed under the Policy have found that the addition of a generic term to a disputed domain name, such as “leaks”, does not avoid a finding of confusing similarity (see sections 1.7 and 1.8 of the [WIPO Overview 3.0](#), see also *Fenix International Limited v. Withheld for Privacy Purposes, Privacy Service Provided by Withheld for Privacy ehf / Marius Pop*, *supra*; *Fenix International Limited c/o Walters Law Group v. Marius*, *supra*, and *Fenix International Limited c/o Walters Law Group v. Dilshan Omantha*, *supra*).

The addition of the TLDs “.com” and “.me” to the disputed domain names constitute a technical requirement of the Domain Name System (“DNS”), and as such may be disregarded under the first element confusing similarity test (see section 1.11 of the [WIPO Overview 3.0](#)).

Additionally, the websites to which the disputed domain names resolved contain textual references to the Complainant’s trademark ONLYFANS and also content pirated from the Complainant’s website, indicating *prima facie* that the Respondents are seeking to target the Complainant’s trademark in the disputed domain names, further affirming the confusing similarity between the disputed domain names and the Complainant’s trademark (see section 1.15 of the [WIPO Overview 3.0](#)).

In light of the above, the first element of the Policy has been met.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy sets forth the following examples as circumstances where a respondent may have rights or legitimate interests in the disputed domain name:

(i) before any notice to the respondent of the dispute, the use by the respondent of, or demonstrable preparations to use, the disputed domain name or a name corresponding to the domain name in connection with a *bona fide* offering of goods or services; or

(ii) the respondent (as an individual, business, or other organization) has been commonly known by the disputed domain name, even if it did not acquire trademark or service mark rights; or

(iii) the respondent is making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Complainant has asserted that there is no relationship between the Complainant and the Respondents, that it has not granted any authorization, license, or consent to the Respondents to use its trademark ONLYFANS in the disputed domain names, and that the Respondents have not been commonly known by the disputed domain names (see *Beyoncé Knowles v. Sonny Ahuja*, WIPO Case No. [D2010-1431](#); and *Six Continents Hotels, Inc. v. IQ Management Corporation*, WIPO Case No. [D2004-0272](#)). The Respondents did not contest these allegations.

The Panel agrees with previous panels appointed under the Policy, in that the ONLYFANS trademark is well known (see *Fenix International Limited c/o Walters Law Group v. Andrei Ivanov*, WIPO Case No. [D2021-1284](#); *Fenix International Limited c/o Walters Law Group v. Marius*, WIPO Case No. [D2021-1340](#); *Fenix International Limited c/o Walters Law Group v. Dilshan Omantha*, WIPO Case No. [DCC2021-0002](#); *Fenix International Limited v. Withheld for Privacy Purposes, Privacy service provided by Withheld for Privacy ehf / Bent Harracksingh*, WIPO Case No. [D2021-1337](#); *Fenix International Limited v. Datos privados*, WIPO Case No. [D2021-1306](#); *Fenix International Limited v. Withheld for Privacy Purposes, Privacy service provided by Withheld for Privacy ehf / Andrei Ivanov*, WIPO Case No. [D2021-1339](#); *Fenix International Limited v. Kiril Kirilov*, WIPO Case No. [D2021-0853](#); *Fenix International Limited c/o Walters Law Group v. Juan Anton, Onlyfanx*, WIPO Case No. [D2021-0837](#); *Fenix International Limited v. WhoisGuard Protected, WhoisGuard Inc. / Genadiy Ivanov*, WIPO Case No. [D2021-0828](#); *Fenix International Limited v. WhoisGuard Protected, WhoisGuard Inc. / kadene wignall*, WIPO Case No. [D2021-0825](#); *Fenix International Limited c/o Walters Law Group v. Danesco Trading Ltd. / AVO Ltd AVO Ltd*, WIPO Case No. [D2021-0863](#); *Fenix International Limited v. WhoisGuard Protected, WhoisGuard, Inc. / Yazid Laiss / Stive Belb / Ahmed Bel Bouahli*, WIPO Case No. [D2021-0152](#); *Fenix International Limited c/o Walters Law Group v. WhoisGuard, Inc., WhoisGuard Protected / Marry Mae Cerna*, WIPO Case No. [D2021-0327](#); *Fenix International Limited v. Domains By Proxy, LLC. / Carolina Rodrigues, Fundacion Comercio Electronico*, WIPO Case No. [D2020-3447](#); *Fenix International Limited v. Tuncay Karatas, Skalonga Event*, WIPO Case No. [D2021-0132](#) and *Fenix International Limited v. Perfect Privacy, LLC/ Chad Moston, Speedplexer*, WIPO Case No. [D2020-1162](#)).

The disputed domain names are confusingly similar the Complainant's trademark ONLYFANS, to which the terms such as "leaks" and "leaked" are added, which shows that the Respondents have targeted the Complainant to promote presumably illegitimate activities. Therefore, the Respondents' conduct cannot be considered as a legitimate noncommercial or fair use of the disputed domain names (see section 2.5.2 of the [WIPO Overview 3.0](#)).

The making available in the websites to which the disputed domain names resolve of content taken from the Complainant's website (created by users of the Complainant's site) without authorization from the Complainant or any clear explanation regarding the relationship of the Parties, cannot be deemed as a *bona fide* offering of goods and services (see *Fenix International Limited v. Withheld for Privacy Purposes, Privacy Service Provided by Withheld for Privacy ehf / Marius Pop*, WIPO Case No. [D2021-2715](#)).

The consensus view among panels appointed under the Policy is that the use of a domain name for illegal activity, such as the misappropriation of copyrighted material, cannot confer rights to, or legitimate interests in a domain name (see section 2.13 of the [WIPO Overview 3.0](#); see also *Self-Portrait IP Limited v. Franklin Kelly*, WIPO Case No. [D2019-0283](#)).

In light of the above, the Complainant made a *prima facie* case that the Respondents lack rights to or legitimate interests in the disputed domain names. The Respondents did not submit any evidence or arguments to challenge the Complainant's assertions.

Therefore, the second element of the Policy has been fulfilled.

C. Registered and Used in Bad Faith

According to paragraph 4(b) of the Policy, the following circumstances, in particular but without limitation, shall be evidence of registration and use in bad faith:

(i) circumstances indicating that the respondent has registered or the respondent has acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of the respondent's documented out-of-pocket costs directly related to the domain name; or

(ii) the respondent has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that the respondent has engaged in a pattern of such conduct; or

(iii) the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, the respondent has 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 as to the source, sponsorship, affiliation, or endorsement of the respondent's web site or location or of a product or service on its web site or location.

As noted above, the Complainant has filed evidence showing that it owns registrations for the trademark ONLYFANS, among others, in the United States (which corresponds to the registrant contact details of one of the Respondents), the European Union (which covers Ireland, which corresponds to the registrant contact details of one of the Respondents), the United Kingdom, and International registrations designating, *inter alia*, Bosnia and Herzegovina (which corresponds to the registrant contact details of one of the Respondents).

The fact that the Respondents registered the disputed domain names which include an important part, or an abbreviation of, the Complainant's well-known trademark ONLYFANS, alongside the terms "latest", "leaks" and "leaked", or the letter "f", and the fact that the websites to which the disputed domain names resolve predominantly display the trademark ONLYFANS, shows that the Respondents have targeted the Complainant's well-known trademark, and suggests opportunistic bad faith (see section 3.2.1 of the [WIPO Overview 3.0](#); see also *L'Oréal v. Contact Privacy Inc. Customer 0149511181 / Jerry Peter*, WIPO Case No. [D2018-1937](#); *Gilead Sciences Ireland UC / Gilead Sciences, Inc. v. Domain Maybe For Sale c/o Dynadot*, WIPO Case No. [D2019-0980](#); *Dream Marriage Group, Inc. v. Romantic Lines LP, Vadim Parhomchuk*, WIPO Case No. [D2020-1344](#); and *Valentino S.p.A. v. Qiu Yufeng, Li Lianye*, WIPO Case No. [D2016-1747](#)).

Previous panels appointed under the Policy have found that the mere registration by an unauthorized party of a domain name that is identical or confusingly similar to a well-known trademark can, under certain circumstances, create a presumption bad faith in itself (see section 3.1.4 of the [WIPO Overview 3.0](#), see also *Toyota Jidosha Kabushiki Kaisha d/b/a Toyota Motor Corporation; Toyota Motor Sales, U.S.A., Inc., and*

Toyota Motor Sales De Mexico, S. De R.L. de C.V. v. Salvador Cobian, WIPO Case No. [DMX2001-0006](#), and *Ferrari S.p.A. v. Ms. Lee Joohee (or Joo-Hee)*, WIPO Case No. [D2003-0882](#)). This is so in the present case. The Respondents have not denied the Complainant's assertions and there is no evidence in the record from which the Panel is able to conceive of a plausible good faith use of the disputed domain names.

Moreover, the disputed domain names resolve to websites that reproduce and make available, without authorization, content belonging to the Complainant's users. Therefore, this Panel considers that the Respondents are trying to capitalize on the reputation and goodwill of the Complainant's trademark by misleading Internet users, for commercial gain, to the disputed domain names, by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the disputed domain names and the websites to which they resolve, which constitutes bad faith under paragraph 4(b)(iv) of the Policy (see section 3.1.4 of the [WIPO Overview 3.0](#), see also *Fontem Holdings 4, B.V. v. J- B-, Limestar Inc.*, WIPO Case No. [D2016-0344](#); *Archer-Daniels-Midland Company v. Wang De Bing*, WIPO Case No. [D2017-0363](#), and *Merck Sharp & Dohme Corp. v. Domain Administrator, PrivacyGuardian.org / George Ring, DN Capital Inc.*, WIPO Case No. [D2017-0302](#)).

Another indicator of bad faith can be a pattern of abusive registrations in which a respondent has been involved. At least some of the Respondents were also respondents in the following cases: *Fenix International Limited c/o Walters Law Group v. Privacy Service Provided by Withheld for Privacy ehf / Nemanja Krecej, Rocket Science Group*, WIPO Case No. [D2022-1622](#); *Fenix International Limited v. Privacy service provided by Withheld for Privacy ehf / Nemanja Krecej*, WIPO Case No. [D2022-0216](#); *Fenix International Limited v. Nemanja Krecej / Nemanja Krecej, Rocket Science Group*, WIPO No. [D2021-2667](#); and *Fenix International Limited c/o Walters Law Group v. WhoisGuard Inc. / Nemanja Krecej*, WIPO Case No. [D2021-0380](#). These cases also involve the Complainant's trademarks. This pattern further supports a finding of bad faith according to paragraph 4(b)(ii) of the Policy (see section 3.1.2 of the [WIPO Overview 3.0](#)).

The abovementioned facts show that not only the Respondents registered the disputed domain names in bad faith, but also, that the Respondents have been using the disputed domain names in bad faith. Therefore, the third element of the Policy has been proven.

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 <fansleaked.me>, <fofleaks.com>, <latestofleaks.com>, and <leaksfans.com> be cancelled.

/Kiyoshi Tsuru/

Kiyoshi Tsuru

Sole Panelist

Date: July 28, 2022