

## **ADMINISTRATIVE PANEL DECISION**

Sfanti Grup Solutions SRL v. Glenna Meadows, Bright Cabrera Traders  
Case No. D2024-3671

### **1. The Parties**

Complainant is Sfanti Grup Solutions SRL, United States of America (“United States”), represented by Walters Law Group, United States.

Respondent is Glenna Meadows, Bright Cabrera Traders, United States.

### **2. The Domain Names and Registrars**

The disputed domain names <megapersonalc.com> and <megapersonalsc.com> are registered with Cosmotown, Inc.

The disputed domain name <megapersonals.fun> is registered with Atak Domain Hosting Internet ve Bilgi Teknolojileri Limited Sirketi d/b/a Atak Teknoloji (hereinafter “Atak Domain Hosting”).

In the discussion below, these three domain names are referred to collectively as “Disputed Domain Names.”

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 10, 2024. The original complaint related to two disputed domain names: <megapersonalc.com> and <megapersonalsc.com>. On September 11, 2024, the Center transmitted by email to Cosmotown, Inc., the Registrar for these two disputed domain names, a request for registrar verification in connection with these two domain Names. On September 13 and 19, 2024, Cosmotown, Inc., transmitted by emails to the Center its verification responses disclosing registrant and contact information for these two disputed domain names which differed from the originally named Respondent (“Redacted”) and contact information in the Complaint. The Center sent emails communications to Complainant on September 13 and 23, 2024, providing the registrant and contact information disclosed by the Cosmotown, Inc., and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on September 23, 2024, naming Glenna Meadows as Respondent.

In its amended Complaint, Complainant also added a third disputed domain name <megapersonals.fun> to this dispute, which disputed domain name Complainant alleged was also owned by Respondent Glenna Meadows. This third disputed domain name was registered by a different Registrar: Atak Domain Hosting.

On September 25, 2024, the Center transmitted by email to Atak Domain Hosting a request for registrar verification in connection with the <megapersonals.fun> disputed domain name. On September 26, 2024, the Atak Domain Hosting transmitted by email to the Center its verification response for this third disputed domain name confirming that the Respondent is listed as the registrant and providing the contact details. Subsequently on September 29, the domain name reseller, Ofaex It Solutions, confirmed that Glenna Medows was the registrant.

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 Respondent of the Complaint, and the proceedings commenced on September 27, 2024. In accordance with the Rules, paragraph 5, the due date for a Response was October 17, 2024. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on October 18, 2024.

The Center appointed Lawrence K. Nodine as the sole panelist in this matter on October 23, 2024. 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 owns and operates the website located at the domain names <megapersonals.com> and <megapersonals.eu>, which it has used for several years in connection with Internet-based social introduction and dating services. Complainant alleges that for several years it has used MEGAPERSONALS (hereinafter the "Mark") in connection with these services. Complainant owns United States Trademark Registration No. 6,432,591 (Registered July 27, 2021) for the Mark.

Respondent registered <megapersonals.fun> on December 21, 2023. Respondent registered <megapersonalc.com> and <megapersonalsc.com> on March 20, 2024.

The websites associated with the Disputed Domain Names all copy Complainant's website, including Complainant's Mark, color scheme, and graphic logo images.

Complainant sent a cease-and-desist letter to Respondent on May 9, 2024, stating that: "It has come to our attention that you have registered www.megaersonalsc.com ('Infringing Domain') which is similar to MP's registered Mark in that it encompasses the Mark with the letter 'c' instead of the letter 's'. The website located at the Infringing Domain is a copycat of MP's website designed to engage in malicious phishing activities to illegally access the accounts of MP's users."<sup>1</sup>

Respondent did not respond to this letter, but Respondent did redirect the <megapersonalc.com> domain name to Complainant's website.

---

<sup>1</sup>Complainant's letter misspelled Respondent's "Infringing Domain," omitting a "p." Respondent apparently overlooked this error given its subsequent redirecting of the Infringing Domain. This is ironic given the allegations of typosquatting.

## 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 Names.

Notably, Complainant contends that the <megapersonalc.com> and <megapersonalsc.com> are typosquatted versions of Complainant's Mark.

Complainant contends that Respondent's websites are "designed [...] for phishing purposes."

### B. Respondent

Respondent did not respond to the Complaint.

## 6. Discussion and Findings

### Request for Consolidation

Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules, but there is no need to rely on this Rule because paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder. Although the amended Complaint was filed in relation to nominally different domain name registrants, subsequent disclosures by the Registrars and resellers revealed that all of the Disputed Domain Names were registered by the same registrant - Respondent Glenna Meadows. Given this, the case may proceed with respect to all three of the Disputed Domain Names without reliance on paragraph 10(e) of the Rules.

### 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 of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[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.

The disputed domain name <megapersonals.fun> is identical to the Mark, except for the generic Top-Level Domain ".fun," which is generally disregarded when evaluating the first element of the Policy. [WIPO Overview 3.0](#) section 1.11.1.

The Panel finds the Mark is recognizable within the disputed domain names <megapersonalc.com> and <megapersonalsc.com>. The addition of "c" at the end of these two disputed domain names seeks to exploit typographical errors and does not prevent confusing similarity. [WIPO Overview 3.0](#), section 1.9. Accordingly, these two disputed domain names are confusingly similar to the Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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 UDRP proceedings is on 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 Respondent. As such, where a complainant makes out a prima facie case that Respondent lacks rights or legitimate interests, the burden of production on this element shifts to Respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on Complainant). If Respondent fails to come forward with such relevant evidence, Complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Disputed Domain Names. 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 Names such as those enumerated in the Policy or otherwise.

The websites to which the three Disputed Domain Names resolve are all copies of Complainant’s website. There is no conceivable legitimate reason to engage in such copying. Complainant contends that the websites associated with the Disputed Domain Names are “designed [ . . . ] for phishing purposes.” Using a domain name as part of a phishing scheme is, of course, illegitimate. See [WIPO Overview 3.0](#), section 2.13.1. Complainant does not offer any concrete evidence that phishing has occurred, but there is no benign explanation for Respondent’s copying of Complainant website, which requires that Internet users sign register for services. Under these circumstances, the Panel exercises its discretion to draw adverse inferences from Respondent’s failure to deny the allegations of phishing. This is especially appropriate because Complainant included the phishing accusation in its cease-and-desist letter, which Respondent implicitly acknowledged when the Respondent redirected the <megapersonalsc.com> disputed domain name to Complainant as requested in Complainant’s letter.

The Panel finds the second element of the Policy has been established.

## **C. Registered and Used in Bad Faith**

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 Panel finds that Respondent registered the Disputed Domain Names in bad faith. All of the websites associated with the Disputed Domain Name are copies of Complainant’s website. Moreover, the websites were created shortly after the Disputed Domain Names were registered. From this, the Panel infers that Respondent was aware of and deliberately targeted Complainant and its rights when the Respondent registered the Disputed Domain Names.

The Panel also finds that Respondent used the Disputed Domain Names intentionally to attract, for commercial gain, Internet users by creating a likelihood of confusion with Complainant’s Mark. This is bad faith use under policy paragraph 4(b)(iv). This finding is based on the copying of Complainant’s website, including Complainant’s Mark, color scheme and graphic logo elements, which copying was likely intended to deceive Internet users looking to use Complainant’s commercial services.

The finding of bad faith use is also supported by adverse inferences drawn from Respondent’s failure to deny the phishing allegations. See [WIPO Overview 3.0](#), paragraph 3.1.3.

Bad faith registration and use are also based on the finding of typosquatting noted above.  
[WIPO Overview 3.0](#), paragraph 3.2.1.

The Panel finds that 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 <megapersonalc.com>, <megapersonalsc.com>, and <megapersonals.fun> be transferred to Complainant.

*/Lawrence K. Nodine/*

**Lawrence K. Nodine**

Sole Panelist

Date: November 1, 2024