

*[Name & Address of* )

*Complainant]*  )

)

**(Complainant)** )

)

v. ) **Domain Names In Dispute:**

)  *[list names]*

*[Name and Address of* )

*Respondent]*  )

)

**(Respondent)** )

)

# COMPLAINT IN ACCORDANCE WITH

**THE UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY**

[1.] This Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy (UDRP), adopted by the Internet Corporation for Assigned Names and Numbers (ICANN) on August 26, 1999 and approved by ICANN on October 24, 1999, and the Rules for Uniform Domain Name Dispute Resolution Policy (UDRP Rules), with an effective date of July 31, 2015, and the Forum’s Supplemental Rules (Supp. Rules). UDRP Rule 3(b)(i).

[2.] **COMPLAINANT INFORMATION**

[a.] Name: *[enter full name of Complainant]*

[b.] Address: *[enter mailing address]*

[c.] Telephone: *[enter telephone number]*

[d.] Fax: *[enter facsimile number]*

[e.] E-Mail: *[enter e-mail address(es)]*

**[3.] COMPLAINANT AUTHORIZED REPRESENTATIVE, IF ANY**

[a.] Name: *[enter full name of Representative(s)]*

[b.] Address: *[enter mailing address]*

[c.] Telephone: *[enter telephone number(s)]*

[d.] Fax: *[enter facsimile number]*

[e.] E-Mail: *[enter e-mail address(es)]*

UDRP Rule 3(b)(ii).

Complainant’s preferred contact person for correspondence relating to this case:

[a.] Contact Name(s): *[enter name(s) of contact persons]*

[b.] Contact Emails(s): *[enter email address(es) to receive all case emails]*

The Complainant chooses to have this dispute heard before a (check one):

*\_\_\_\_\_ single-member administrative panel; \_\_\_\_ three-member administrative panel].*

Rule 3(b)(iv).

[If Complainant elects to have this dispute heard before a three-member panel, provide the names and contact details of three candidates from any ICANN-approved Provider’s list of panelists to serve as one of the panelists.] UDRP Rule 3(b)(iv).

[4.] **RESPONDENT INFORMATION**

[a.] Name:  *[enter full name of Respondent – should be same as “Registrant”]*

[b.] Address: *[enter mailing address]*

[c.] Telephone: *[enter telephone number]*

[d.] Fax: *[enter facsimile number]*

[e.] E-Mail: *[enter e-mail address]*

**[5.] RESPONDENT AUTHORIZED REPRESENTATIVE, IF KNOWN**

[a.] Name: *[enter full name of Representative(s)]*

[b.] Address: *[enter mailing address]*

[c.] Telephone: *[enter telephone number(s)]*

[d.] Fax: *[enter facsimile number]*

[e.] E-Mail: *[enter e-mail address(es)]*

Rule 3(b)(v).

[In this section, please include any arguments you are making with respect to Forum Supplemental Rule 1(d)].

[6.] **DISPUTED DOMAIN NAME(S)**

[a.] The following domain name(s) is/are the subject of this Complaint: Rule 3(b)(vi).

*[enter the disputed domain name(s) here without the “www.”]*

[b.] Registrar Information: UDRP Rule 3(b)(vii).

[i.] Registrar’s Name: *[enter the Registrar Company(ies) with whom the domain name(s) is/are registered.]*

[ii.] Registrar Address: *[enter Registrar’s address]*

[iii.] Telephone Number: *[enter Registrar’s phone number]*

[iv.] E-Mail Address: *[enter Registrar’s e-mail address]*

[c.] Trademark/Service Mark Information: Rule 3(b)(viii).

[Specify the trademark(s) or service mark(s) on which the complaint is based and, for each mark, describe the goods or services if any, with which the mark is used (Complainant may also separately describe other goods and services with which it intends, at the time the complaint is submitted, to use the mark in the future.) Please refer to the definition of Complainant in the Rules and Supplemental Rules if you intend to list more than one Complainant, regarding whose trademark information to include.]

[7.] **FACTUAL AND LEGAL GROUNDS**

This Complaint is based on the following factual and legal grounds: UDRP Rule 3(b)(ix). ***[All three elements of the Policy must be alleged and proved by the Complainant. UDRP Para. 4(a).]*** *[The analysis in this section may require more space than provided, but the entire Complaint shall not exceed fifteen (15) pages. Forum Supp. Rule 4(a).]*

[a.] *Specify in the space below the manner in which the domain name(s) is/are identical or confusingly similar to a trademark or service mark in which the Complainant has rights.* *UDRP Rule 3(b)(ix)(1); UDRP Policy ¶ 4(a)(i).*

[b.] *Specify in the space below why the Respondent (domain-name holder) should be considered as having no rights or legitimate interests in respect of the domain name(s) that is/are the subject of the complaint. UDRP Rule 3(b)(ix)(2); UDRP Policy ¶ 4(a)(ii).*  *The Panel may consider any relevant aspects included in, but not limited to UDRP Policy ¶ 4(c).*

[c.] *Specify in the space below why the domain name(s) should be considered as having been registered and being used in bad faith.* *UDRP Rule 3(b)(ix)(3); UDRP Policy ¶ 4(a)(iii). The Panel may consider any relevant aspects included in, but not limited to UDRP Policy ¶ 4(b).*

[8.] **REMEDY SOUGHT**

The Complainant requests that the Panel issue a decision that the domain-name registration be [“transferred” or “cancelled” – Note: if Complainant prevails, transferring gives Complainant control of the domain name. Cancellation simply takes it from Respondent. Anyone can re-register a cancelled domain name.] UDRP Rule 3(b)(x); UDRP Policy ¶ 4(i).

[9.] **OTHER LEGAL PROCEEDINGS**

[Identify any other legal proceedings that have been commenced or terminated in connection with or relating to any of the domain name(s) that are the subject of the complaint, including previous UDRP cases involving one or more of the domain names at issue here.] UDRP Rule 3(b)(xi).

[10.] **MUTUAL JURISDICTION**

The Complainant will submit, with respect to any challenges to a decision in the administrative proceeding canceling or transferring the domain name, to [choose one jurisdiction]:

\_\_\_\_\_a) the location of the principal office of the concerned registrar or

\_\_\_\_\_b) where the Respondent is located, as shown by the address(es) given for the domain name holder in the Whois Database at the time of the submission of the Complaint to Forum. UDRP Rule 3(b)(xii).

[11.] **CERTIFICATION**

Complainant agrees that its claims and remedies concerning the registration of the domain name, 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 Forum and panelists, except in the case of deliberate wrongdoing, (b) the registrar, (c) the registry administrator, and (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

Complainant certifies that the information contained in this Complaint is to the best of Complaint'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 these Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Respectfully Submitted,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[Signature]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[Name]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[Date]

[Annex any documentary or other evidence, including a copy of the Policy applicable to the domain name(s) in dispute and any trademark or service mark registration upon which the complaint relies, together with a schedule indexing such evidence.] UDRP Rule 3(b)(xiv).

[The Complaint, not including annexed material, shall not exceed fifteen (15) pages.] Forum Supp. Rule 4(a).

[The Complaint and Annexes shall be submitted electronically, in accordance with the electronic submission requirements listed in the Annex to the Supplemental Rules, to domaindispute@adrforum.com.] Forum Supp. Rule 4(b).