

3. Procedural History

3.1. Procedural history of the present case

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 9, 2024. On February 14, 2024, the Center transmitted by email to the First Registrar a request for registrar verification in connection with the disputed domain names. On February 16, 2024, the First 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 (John Doe c/ Cosmotown, Inc.) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 16, 2024, providing the registrant and contact information disclosed by the First Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on February 23, 2024, by which it requested the addition to it of the domain name <verizonadministrativecharhesettlement.com>. On the same date, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name <verizonadministrativecharhesettlement.com>. On February 27, 2024, the Registrar confirmed that the Respondent is the registrant of this disputed domain name.

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 Respondent of the Complaint, and the proceedings commenced on February 28, 2024. In accordance with the Rules, paragraph 5, the due date for Response was March 19, 2024. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 21, 2024.

The Center appointed Assen Alexiev as the sole panelist in this matter on April 2, 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.

On April 8, 2024, the Complainant requested the consolidation of the present case with WIPO Cases Nos. D2024-0707, D2024-1147, and D2024-1148. On April 11, 2024, the Center transmitted by email to the Second, Third, and Fourth Registrars requests for registrar verification in connection with the domain names included in the Complaints in WIPO Cases Nos. D2024-0707, D2024-1147, and D2024-1148. On April 11, 2024, the above Registrars transmitted by email to the Center their verification responses confirming the previously disclosed registrant information. On the same date, the Panel issued Procedural Order No. 1, by which the Panel granted an opportunity to the Respondent to reply until April 14, 2024, to the Procedural Order No. 1 and to submit its Reply including comments (if any) regarding the Complainant’s consolidation request. The Panel also informed the Parties that upon the receipt of the Respondent’s submissions, if any, the Panel will proceed with a Decision and inform the Parties of any further procedural steps including the extended Decision due date. The Respondent did not submit any Reply or comments on the Complainant’s consolidation request within the time limit fixed by the Panel. On April 15, 2024, the Panel issued Procedural Order No. 2, by which the Panel informed the Parties that the Panel would proceed with the decision, which would address the consolidation of the WIPO Case Nos. D2024-0707, D2024-1147, and D2024-1148 into WIPO Case No. D2024-0672, and extended the due date for the Decision until April 22, 2024.

3.2. Procedural history of WIPO Case No. D2024-0707

The Complaint in this case was filed with the Center on February 13, 2024. On February 15, 2024, the Center transmitted by email to the Second Registrar a request for registrar verification in connection with the disputed domain names included in this case. On February 15, 2024, the Second Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for such disputed

domain names which differed from the named Respondent (John Doe / SAV.COM, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 27, 2024, providing the registrant and contact information disclosed by the Second Registrar, and inviting the Complainant to submit an amendment to the Complaint.

The Complainant filed an amended Complaint on March 1, 2024.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Policy, the Rules, and the Supplemental Rules. In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on March 4, 2024. In accordance with the Rules, paragraph 5, the due date for Response was March 24, 2024. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on March 27, 2024.

On April 11, 2024, the Center informed the Parties of the Complainant's separate request for consolidation of the proceedings submitted in WIPO Case No. D2024-0672. As described above, on the same date, the Panel issued Procedural Order No. 1, by which the Panel granted an opportunity to the Respondent to reply until April 14, 2024, to the Procedural Order No. 1. As no reply was received from the Respondent, on April 15, 2024, the Panel issued Procedural Order No. 2, by which he informed the Parties that he would proceed with the decision, which would address the consolidation of the WIPO Case Nos. D2024-0707, D2024-1147, and D2024-1148 in WIPO Case No. D2024-0672.

3.3. Procedural history of WIPO Case No. D2024-1148

The Complaint was filed with the Center on March 15, 2024. On March 18, 2024, the Center transmitted by email to the Third Registrar a request for registrar verification in connection with the disputed domain names included in this case. On March 18, 2024, the Third Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for such disputed domain names which differed from the named Respondent (John Doe / Porkbun LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 19, 2024, providing the registrant and contact information disclosed by the Third Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on March 19, 2024.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Policy, the Rules, and the Supplemental Rules. In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on March 20, 2024. In accordance with the Rules, paragraph 5, the due date for Response was April 9, 2024. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 10, 2024.

On April 11, 2024, the Center informed the Parties of the Complainant's separate request for consolidation of the proceedings submitted in WIPO Case No. D2024-0672. As described above, on the same date, the Panel issued Procedural Order No. 1, by which the Panel granted an opportunity to the Respondent to reply until April 14, 2024, to the Procedural Order No. 1. As no reply was received from the Respondent, on April 15, 2024, the Panel issued Procedural Order No.2, by which he informed the Parties that he would proceed with the decision, which would address the consolidation of the WIPO Case Nos. D2024-0707, D2024-1147, and D2024-1148 in WIPO Case No. D2024-0672.

3.4. Procedural history of WIPO Case No. D2024-1147

The Complaint was filed with the Center on March 15, 2024. On March 18, 2024, the Center transmitted by email to the Fourth Registrar a request for registrar verification in connection with the disputed domain names included in this case. On March 19, 2024, the Fourth Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for such disputed domain names which differed from the named Respondent (John Doe / NameSilo, LLC) and contact information in the Complaint.

The Center sent an email communication to the Complainant on March 20, 2024, providing the registrant and contact information disclosed by the Fourth Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on March 20, 2024.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Policy, the Rules, and the Supplemental Rules. In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on March 25, 2024. In accordance with the Rules, paragraph 5, the due date for Response was April 14, 2024.

On April 11, 2024, the Center informed the Parties of the Complainant's separate request for consolidation of the proceedings submitted in WIPO Case No. D2024-0672. As described above, on the same date, the Panel issued Procedural Order No. 1, by which the Panel granted an opportunity to the Respondent to reply until April 14, 2024, to the Procedural Order No. 1. As no reply was received from the Respondent, on April 15, 2024, the Panel issued his Procedural Order No. 2, by which he informed the Parties that he would proceed with the decision, which would address the consolidation of the WIPO Case Nos. D2024-0707, D2024-1147, and D2024-1148, in WIPO Case No. D2024-0672.

4. Factual Background

The Complainant was established in 2000. It is a provider of technology and communications products and services, including voice, data, and video services and solutions. The Complainant operates in over 150 countries around the world and serves 99% of the Fortune 500 companies.

The Complainant is the owner of a number of trademark registrations for the sign VERIZON, including the United States trademark VERIZON with registration No. 2886813, registered on September 21, 2004, for goods and services in International Classes 9, 16, 35, 36, 37, 38, 41, and 42 (the "VERIZON trademark").

The Complainant is also the owner of the domain name <verizon.com>, which resolves to its official website.

The Complainant is currently the defendant in a class action lawsuit, Esposito et al. v. Cellco Partnership d/b/a Verizon Wireless, regarding an administrative charge on certain Verizon service plans (the "Lawsuit"). On November 8, 2023, the Complainant entered into an agreement to settle the Lawsuit (the "Settlement Agreement"). As part of the Settlement Agreement, the Complainant agreed to pay a specified amount of money into a Settlement Fund to be administered and maintained by a third-party administrator ("Settlement Fund Administrator"). The Settlement Agreement requires the Settlement Fund Administrator to create and maintain a website at the domain name <verizonadministrativechargesettlement.com> (the "Settlement Website"). Parties who believe that they are entitled to payment from the Settlement Fund may file a claim through the Settlement Website.

The details about the dates of registration of the disputed domain names and the websites to which they resolve are included in the four tables below.

Table 1. Disputed domain names originally included in the present case before its consolidation with WIPO Cases Nos. D2024-0707, D2024-1147, and D2024-1148

Disputed domain name	Date of registration	Resolves to
<berizonadministrativecharges.com>	January 7, 2024	blank parking webpage
<erizonadministrativechargesettlement.com>	January 26, 2024	parking webpage with pay-per-click ("PPC") links
<vaerizonadministrativechargesettlement.com>	February 2, 2024	parking webpage with PPC links
<veriaonadministrativechargesettlement.com>	January 6, 2024	blank parking webpage

<veriazonadministrativechargesettlement.com>	January 23, 2024	parking webpage with PPC links
<verizonadministrativechargesettlement.com>	January 10, 2024	blank parking webpage
<verizoadministrationchargesettlement.com>	February 2, 2024	parking webpage with PPC links
<verizonaadministrativechargesettlement.com>	January 10, 2024	parking webpage with PPC links
<verizonactionsettlemnt.com>	January 6, 2024	parking webpage with PPC links
<verizonadinistativechargesettlement.com>	January 26, 2024	blank parking webpage
<verizonadinistrativechargesettment.com>	January 17, 2024	parking webpage with PPC links
<verizonadminastrativechargesettlemeny.com>	January 26, 2024	parking webpage with PPC links
<verizonadministrativechargesettlement.com>	January 23, 2024	parking webpage with PPC links
<verizonadmininstativechargesettlement.com>	January 24, 2024	parking webpage with PPC links
<verizonadmininstrativechargesettlement.com>	February 5, 2024	blank parking webpage
<verizonadminisrativechagesettlement.com>	January 25, 2024	parking webpage with PPC links
<verizonadminisstrativechargesettlement.com>	February 5, 2024	parking webpage with PPC links
<verizonadministaticechargesettlment.com>	January 24, 2024	blank parking webpage
<verizonadministraivechargesettlement.com>	January 25, 2024	parking webpage with PPC links
<verizonadministratechargesettlement.com>	January 14, 2024	blank parking webpage
<verizonadministraticechargesettlement.com>	January 6, 2024	blank parking webpage
<verizonadministrationchangeseltment.com>	January 24, 2024	parking webpage with PPC links
<verizonadministrationchangesettlement.com>	February 5, 2024	parking webpage with PPC links
<verizonadministrationchargesettlement.com>	January 6, 2024	blank parking webpage
<verizonadministrationchargesettlent.com>	January 25, 2024	parking webpage with PPC links
<verizonadministrationchargessettlement.com>	January 10, 2024	blank parking webpage
<verizonadministrativecgardesettlement.com>	January 25, 2024	blank parking webpage
<verizonadministrativecghargesettlement.com>	January 14, 2024	parking webpage with PPC links
<verizonadministrativechangesetement.com>	January 23, 2024	parking webpage with PPC links
<verizonadministrativechangesettlment.com>	January 17, 2024	blank parking webpage
<verizonadministrativechargedettlement.com>	January 6, 2024	parking webpage with PPC links
<verizonadministrativechargedsettlement.com>	January 6, 2024	parking webpage with PPC links
<verizonadministrativecharges.com>	January 6, 2024	blank parking webpage
<verizonadministrativechargeselttlement.com>	February 1, 2024	parking webpage with PPC links
<verizonadministrativechargeseltement.com>	January 24, 2024	blank parking webpage
<verizonadministrativechargeselttlement.com>	January 31, 2024	parking webpage with PPC links

<verizonadministrativechargesetrlment.com>	January 9, 2024	parking webpage with PPC links
<verizonadministrativechargesettelement.com>	January 9, 2024	blank parking webpage
<verizonadministrativechargesettleent.com>	February 5, 2024	parking webpage with PPC links
<verizonadministrativechargesettlemenr.com>	January 18, 2024	parking webpage with PPC links
<verizonadministrativechargesettlemeny.com>	January 9, 2024	blank parking webpage
<verizonadministrativechargesettlemet.com>	January 6, 2024	blank parking webpage
<verizonadministrativechargesettlemsnt.com>	January 6, 2024	blank parking webpage
<verizonadministrativechargesettlenent.com>	January 23, 2024	blank parking webpage
<verizonadministrativechargesettlent.com>	January 7, 2024	blank parking webpage
<verizonadministrativechargesettlerment.com>	January 24, 2024	blank parking webpage
<verizonadministrativechargesettlrment.com>	January 6, 2024	blank parking webpage
<verizonadministrativechargesetttlement.com>	January 9, 2024	blank parking webpage
<verizonadministrativechargesswttlement.com>	January 26, 2024	parking webpage with PPC links
<verizonadministrativechargesttlement.com>	January 9, 2024	parking webpage with PPC links
<verizonadministrativechargrsettlement.com>	January 25, 2024	blank parking webpage
<verizonadministrativechargwsettlement.com>	January 16, 2024	blank parking webpage
<verizonadministrativecharvesettlement.com>	January 23, 2024	parking webpage with PPC links
<verizonadministrativechqrgesettlement.com>	January 6, 2024	parking webpage with PPC links
<verizonadministrativechrgesettlement.com>	January 13, 2024	blank parking webpage
<verizonadministrativeclaimsettlement.com>	February 5, 2024	blank parking webpage
<verizonadministrativeschargesettlement.com>	January 25, 2024	blank parking webpage
<verizonadministrativesettelmetcharges.com>	January 14, 2024	blank parking webpage
<verizonadministrativesettlementcharge.com>	January 6, 2024	blank parking webpage
<verizonadministrativesettlementcharges.com>	January 14, 2024	parking webpage with PPC links
<verizonadministrativesettlentcharges.com>	January 17, 2024	parking webpage with PPC links
<verizonadministrativevechargesettlement.com>	January 26, 2024	parking webpage with PPC links
<verizonadministrattivechargesettlement.com>	February 1, 2024	parking webpage with PPC links
<verizonadministratuvechargesettlement.com>	January 25, 2024	blank parking webpage
<verizonadministravichargesettlement.com>	February 5, 2024	blank parking webpage
<verizonadministraviechargesettlement.com>	January 14, 2024	blank parking webpage
<verizonadministrivechargesettlement.com>	January 10, 2024	parking webpage with PPC links
<verizonadministrstivechargesettlement.com>	January 7, 2024	blank parking webpage
<verizonadministrstivechargessettlement.com>	January 6, 2024	parking webpage with PPC links
<verizonadministrtrivechargesettlement.com>	January 8, 2024	blank parking webpage
<verizonadminisyrtivechargesettlement.com>	January 8, 2024	blank parking webpage
<verizonadminitgrativechargesettlement.com>	January 23, 2024	blank parking webpage
<verizonadministativechargesettlement.com>	January 6, 2024	blank parking webpage
<verizonadministrationchargesettlement.com>	January 8, 2024	blank parking webpage
<verizonadministrativechangesettlement.com>	January 25, 2024	blank parking webpage
<verizonadministrativechargesettlement.com>	January 24, 2024	blank parking webpage

<verizonadministrativechargesettlement.com>	January 7, 2024	parking webpage with PPC links
<verizonadministrativecharhesettlement.com>	February 9, 2024	blank parking webpage
<verizonadministrativesettlement.com>	January 6, 2024	parking webpage with PPC links
<verizonadministrativvechargesettlement.com>	January 24, 2024	blank parking webpage
<verizonadmisistrativecahargesettlemtn.com>	January 25, 2024	blank parking webpage
<verizonadmisistrativechargesettlement.com>	January 25, 2024	blank parking webpage
<verizonadministrativesettlement.com>	January 6, 2024	parking webpage with PPC links
<verizonadmistrativechargesettlement.com>	January 10, 2024	parking webpage with PPC links
<verizonadministrativechargesettlement.com>	January 16, 2024	parking webpage with PPC links
<verizonainistrativechargesettlement.com>	January 13, 2024	parking webpage with PPC links
<verizonasministrativechargesettlement.com>	January 8, 2024	blank parking webpage
<verizonasministrativechatgesettlement.com>	February 5, 2024	blank parking webpage
<verizonasminitrativechargesettlement.com>	January 23, 2024	blank parking webpage
<verizonchargesettlement.com>	January 6, 2024	blank parking webpage
<verizonsadministrativechargesettlement.com>	January 6, 2024	blank parking webpage
<verizonsministrativechargesettlement.com>	January 23, 2024	blank parking webpage
<verizovadministrtrivechargesettlement.com>	January 24, 2024	parking webpage with PPC links
<verizzonadministrativechargesettlement.com>	February 5, 2024	blank parking webpage
<verozonadministrativechargesettlement.com>	January 16, 2024	parking webpage with PPC links
<versizonadministrativechargesettlement.com>	January 16, 2024	blank parking webpage
<verzionadministrativechargesettlement.com>	January 10, 2024	parking webpage with PPC links
<virizonadministrativechargesettlement.com>	January 25, 2024	blank parking webpage

At the time of the filing of the Complaint in the present case, all disputed domain names in Table 1 resolved to parking webpages with PPC links.

Table 2. Disputed domain names originally included in WIPO Case No. D2024-0707 before its consolidation with WIPO Case No. D2024-0672

Disputed domain name	Date of registration	Resolves to
<verizonadminchargesettlement.com>	January 5, 2024	blank parking webpage
<verizonadministrativecharge.com>	January 5, 2024	blank parking webpage
<verizonadministrativechargesettlement.co>	January 5, 2024	blank parking webpage
<verizonadministrativechargesettlement.com>	January 5, 2024	blank parking webpage
<verizonadministravtivechargesettlement.com>	January 18, 2024	parking webpage with PPC links
<verizonadministrativecharesettlement.com>	January 18, 2024	blank parking webpage
<verizonsdministrativechargesettlement.com>	January 18, 2024	blank parking webpage
<verizonaministrativechargesettlement.com>	January 20, 2024	blank parking webpage
<verisonadministrativechargesettlement.com>	January 21, 2024	parking webpage with PPC links
<verizonadinistrativechargesettlement.com>	January 21, 2024	parking webpage with PPC links
<verizonadminisatrativechargesettlement.com>	January 21, 2024	parking webpage with PPC links

<verizonadministrativechardesettlement.com>	January 21, 2024	blank parking webpage
<verionadministrativechargesettlement.com>	January 22, 2024	parking webpage with PPC links
<verizonadminisreativechargesettlement.com>	January 22, 2024	blank parking webpage
<verizonadministrativechargesettlememt.com>	January 22, 2024	parking webpage with PPC links
<verizonadministrativechargesettlemwnt.com>	January 22, 2024	blank parking webpage
<verizonadministrativechargesettlement.com>	January 22, 2024	parking webpage with PPC links
<verizonadministratorchargesettlement.com>	January 22, 2024	parking webpage with PPC links
<verizonadministratvechargesettlement.com>	January 22, 2024	blank parking webpage
<verizonadministravechargesettlement.com>	January 22, 2024	blank parking webpage
<verizonadmintrativechargesettlement.com>	January 22, 2024	parking webpage with PPC links
<verzonadministrativechargesettement.com>	January 22, 2024	blank parking webpage
<myverizonadministrativechargesettlement.com>	January 23, 2024	parking webpage with PPC links
<veriznadministrativechargesettlement.com>	January 23, 2024	parking webpage with PPC links
<verizonadminastrativechargesettlement.com>	January 23, 2024	blank parking webpage
<verizonadminisrativechargesettlement.com>	January 23, 2024	blank parking webpage
<verizonadminisrrativechargesettlement.com>	January 23, 2024	parking webpage with PPC links
<verizonadministrartivechargesettlement.com>	January 23, 2024	parking webpage with PPC links
<verizonadministrativechrgesettlement.com>	January 23, 2024	parking webpage with PPC links
<verizonadministtativechargesettlement.com>	January 23, 2024	blank parking webpage
<vverizonadministrativechargesettlement.com>	January 23, 2024	blank parking webpage
<verizonadministrationsettle.com>	January 30, 2024	blank parking webpage

At the time of the filing of the Complaint in WIPO Case No. D2024-0707, all disputed domain names in Table 2 resolved to parking webpages with PPC links.

Table 3. Disputed domain names originally included in WIPO Case No. D2024-1147 before its consolidation with WIPO Case No. D2024-0672

Disputed domain name	Date of registration	Resolves to
<verizonadministrativechangesettlement.com>	January 20, 2024	blank parking webpage
<verizonadministrativechargesettlemect.com>	January 31, 2024	Inactive

At the time of the filing of the Complaint in WIPO Case No. D2024-1147, all disputed domain names in Table 3 resolved to parking webpages with PPC links.

Table 4. Disputed domain names originally included in WIPO Case No. D2024-1148 before its consolidation with WIPO Case No. D2024-0672

Disputed domain name	Date of registration	Resolves to
<verizonadministrativechagersettlement.com>	January 29, 2024	Inactive
<verizonadministrativechangesetrtlement.com>	January 29, 2024	inactive
<verizonafministrativechargesettlement.com>	January 29, 2024	inactive
<verizonadministrativechargesettlement.com>	January 30, 2024	Inactive

<verizonadministrativechargesettlement.com>	January 30, 2024	inactive
<verizonandministrativechargesettlement.com>	January 30, 2024	inactive

At the time of the filing of the Complaint in WIPO Case No. D2024-1148, all disputed domain names in Table 4 resolved to parking webpages with PPC links.

5. Parties' Contentions

A. Complainant

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

The Complainant notes that its proprietary rights in the VERIZON trademark predate the Respondent's registration of the disputed domain names by more than 23 years.

The Complainant states that the disputed domain names are confusingly similar to its VERIZON trademark, because they incorporate either the same trademark in its entirety, or misspellings of the same trademark in various combinations with the English words "administrative charge settlement" or misspellings of them. The Complainant submits that the addition of the terms "administrative", "charge", and "settlement" or the misspellings of one or more of them does not diminish the confusing similarity of the disputed domain names to the Complainant's VERIZON trademark.

According to the Complainant, the Respondent has no rights or legitimate interests in respect of the disputed domain names, because the Complainant has not authorized it to register or use them and there is no connection between the Complainant and the Respondent. The Complainant maintains that the Respondent has no trademark registrations for "Verizon" and has not been authorized to use the VERIZON trademark. The Complainant submits that all disputed domain names are misspellings of the Settlement Website at the domain name <verizonadministrativechargesettlement.com> and resolve to landing webpages designed to monetize the VERIZON trademark by offering sponsored links that are of the type consumers would expect to see on the Settlement Website in order to divert customers seeking to file claims in connection with the Lawsuit to websites of third parties, which does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain names.

The Complainant contends that the disputed domain names were registered and are being used in bad faith. According to it, the Respondent registered and is using the disputed domain names to take advantage of the goodwill and reputation of the Complainant's VERIZON trademark. In the Complainant's view, the Respondent was aware of the Complainant's rights in the VERIZON trademark at the time the Respondent registered and began using the disputed domain names.

The Complainant maintains that the Respondent has registered and is using the disputed domain names to attempt to attract, for commercial gain, Internet users to the websites at the disputed domain names by creating a likelihood of confusion with the Complainant's VERIZON trademark as to the source, sponsorship, affiliation, or endorsement of the websites at the disputed domain names.

The Complainant also maintains that, by registering and using the disputed domain names, the Respondent is engaged in bad faith typosquatting. The Respondent has registered the disputed domain names, which consist of Complainant's VERIZON trademark, or obvious misspellings thereof, and obvious misspellings of the terms "administrative", "charge", and "settlement", and seeks to profit from Internet traffic generated by the fact that some Internet users might inadvertently misspell the Complainant's VERIZON trademark and/or the words "administrative", "charge", or "settlement" when they type the address of the Settlement Website into their browsers as they seek to locate the Settlement Website on the Internet, and will be diverted to one of the websites at the disputed domain names which feature pay-per-click links to advertisements for third-party products and services.

B. Respondent

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

6. Discussion and Findings

6.1. Procedural issue – Consolidation of the proceedings

The Complainant requested the consolidation of the present case with WIPO Cases Nos. D2024-0707, D2024-1147, and D2024-1148 on the grounds that all domain names included in the four proceedings are registered by the same registrant, who is the Respondent. On April 11, 2024, the Panel issued Procedural Order No. 1, by which the Panel granted an opportunity to the Respondent to reply until April 14, 2024, to the Procedural Order No. 1 and to submit its Reply including comments (if any) regarding the Complainant's consolidation request. The Respondent did not submit any Reply or comments on the Complainant's consolidation request within the time limit fixed by the Panel.

On April 15, 2024, the Panel issued Procedural Order No. 2, whereby the Panel informed the Parties that the Panel would proceed with the decision, which would address the consolidation of the WIPO Case Nos. D2024-0707, D2024-1147, and D2024-1148 into WIPO Case No. D2024-0672.

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. In addressing the Complainant's consolidation request, the Panel has to consider whether the disputed domain names or corresponding websites are subject to common control, and whether the consolidation would be fair and equitable to all Parties.

As regards common control, it follows from the information provided by the four Registrars that all the disputed domain names had been registered by the same registrant, which is the Respondent. As regards fairness and equity, the Panel sees no reason why the consolidation of the disputes would be unfair or inequitable to any Party, and in any case neither of the Parties had alleged otherwise.

Taking the above into account, the Panel decided to allow the consolidation of the WIPO Case Nos. D2024-0707, D2024-1147, and D2024-1148 into WIPO Case No. D2024-0672.

In view of the consolidation of the four proceedings, the Panel will hereafter refer to the disputed domain names included in all of them as the "disputed domain names".

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 the 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.

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

The Panel finds the VERIZON trademark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the VERIZON trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The disputed domain names <berizonadministrativecharges.com>, <erizonadministrativechargesettlement.com>, <vaerizonadministrativechargesettlement.com>, <veriaonadministrativechargesettlement.com>, <veriazonadministrativechargesettlement.com>, <verizionadministrativechargesettlement.com>, <verizoadministrationchargesettlement.com>, <verizovadministrtrivechargesettlement.com>, <verizzonadministrativechargesettlement.com>, <verozonadministrativechargesettlement.com>, <versizonadministrativechargesettlement.com>, <verzionadmistrativechargesettlement.com>, <virizonadministrativechargesettlement.com>, <verisonadminstrativechargesettlement.com>, <verionadministrativechargesettlement.com>, <verzonadministrativechargesettlement.com>, <veriznadministrativechargesettlement.com>, and <vverizonadministrativechargesettlement.com> contain obvious misspellings of the VERIZON trademark.

As discussed in section 1.9 of the [WIPO Overview 3.0](#), a domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. This stems from the fact that the domain name contains sufficiently recognizable aspects of the relevant mark. Under the second and third elements, panels will normally find that employing a misspelling in this way signals an intention on the part of the respondent (typically corroborated by infringing website content) to confuse users seeking or expecting the complainant.

Although the addition of other terms (here, various combinations of the words “administrative”, “administration”, “charge”, “action”, “my” and/or “settlement”, or their misspellings) may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain names and the VERIZON trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Panel therefore finds that 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 the Respondent may demonstrate rights or legitimate interests in a disputed domain name.

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

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names. The Respondent has not rebutted the 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 Complainant has provided evidence that it is currently the defendant in the Lawsuit and that it has entered into a Settlement Agreement to settle the Lawsuit. As part of this settlement, the Complainant agreed to pay a specified amount of money into a settlement fund, so that third parties who believe that they are entitled to payment from the Complainant could file a claim through the Settlement Website at the domain name <verizonadministrativechargesettlement.com>. All disputed domain names represent different misspellings of that official domain name, and at the time of filing of the respective Complaint that included them, each of them resolved to a landing webpage containing pay-per-click links to third party websites.

This supports a conclusion that the Respondent has attempted to receive financial gain, by registering as many as possible misspellings of the domain name <verizonadministrativechargesettlement.com> which resolves to the Settlement Website mentioned above, and thus speculating on the possibility that some Internet users might mistype the address of the Settlement Website, in order to attract them and expose them to third party offerings. Given the vast number of the disputed domain names, the similarities between them, the fact that each of them represents a misspelling of the official domain name of the Settlement Website, and the fact that they have all been registered within a short time span, the Panel concludes that the Respondent had the same intentions in respect of all of the disputed domain names, including the ones that do not currently direct to websites containing PPC links. The Panel does not regard such conduct as giving rise to rights or legitimate interests of the Respondent in the disputed domain names.

The Panel therefore 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.

As discussed in sections 6.2.A and 6.2.B above, all of the disputed domain names are confusingly similar to the VERIZON trademark and represent misspellings of the official domain name <verizonadministrativechargesettlement.com>, which resolves to the Settlement Website where third parties who believe that they are entitled to payment from the Complainant may file a claim. The massive number of the disputed domain names makes it clear that the Respondent is well aware of the Complainant and the Lawsuit, and that the purpose of their registration was to confuse and attract Internet users wishing to file a claim against the Complainant. The above, combined with the fact that at the time of the filing of the respective Complaint that included them, each of the disputed domain names resolved to a webpage containing PPC links to third party offerings, shows that their registration and use was made in an attempt by the Respondent to receive undue financial gain. The fact that the Respondent has registered so many misspelled domain names also supports a conclusion that the Respondent has engaged in a pattern of such bad faith conduct.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but 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.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. Having reviewed the available record, the Panel finds the current non-use of the disputed domain names <berizonadministrativecharges.com>, <veriaonadministrativechargesettlement.com>, <verizonadministrativechargesettlement.com>, <verizonadinistativechargesettlement.com>, <verizonadmininstrativechargesettlement.com>, <verizonadministaticechargesettlment.com>, <verizonadministratechargessettlement.com>, <verizonadministraticechargesettlement.com>, <verizonadministrationchargesettlement.com>, <verizonadministrationchargessettlement.com>, <verizonadministrativecgardesettlement.com>, <verizonadministrativechangesettlment.com>, <verizonadministrativecharges.com>, <verizonadministrativechargeseltement.com>, <verizonadministrativechargesettelement.com>, <verizonadministrativechargesettlemeny.com>, <verizonadministrativechargesettlemet.com>, <verizonadministrativechargesettlesnt.com>, <verizonadministrativechargesettlenent.com>, <verizonadministrativechargesettlent.com>, <verizonadministrativechargesettlerment.com>, <verizonadministrativechargesettlrment.com>, <verizonadministrativechargesettlement.com>, <verizonadministrativechargrsettlement.com>, <verizonadministrativechargwsettlement.com>, <verizonadministrativechrgessettlement.com>, <verizonadministrativeclaimsettlement.com>, <verizonadministrativeschargesettlement.com>, <verizonadministrativesettelmetcharges.com>, <verizonadministrativesettlementcharge.com>, <verizonadministratuechargesettlement.com>, <verizonadministravichargesettlement.com>, <verizonadministraviechargesettlement.com>.

<verizonadministrativechargesettlement.com>, <verizonadministrativechrgesettlement.com>, <verizonadministrativechargesettlement.com>, and <verizonadministrativechargesettlement.com> be transferred to the Complainant.

/Assen Alexiev/

Assen Alexiev

Sole Panelist

Date: April 18, 2024