

ADMINISTRATIVE PANEL DECISION

SNEP S.p.A. v. Domain Manager, Web Media Group LLC

Case No. D2025-3597

1. The Parties

The Complainant is SNEP S.p.A., Italy, represented by Studio Legale Associato Cerino D'Angelo, Italy.

The Respondent is Domain Manager, Web Media Group LLC, China, represented by John Berryhill, Ph.d., Esq., United States of America.

2. The Domain Name and Registrar

The disputed domain name <snep.com> is registered with GoDaddy Online Services Cayman Islands Ltd. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 5, 2025. On September 5, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 5, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent ("Domains By Proxy. LLC") and contact information in the Complaint. The Center sent an email communication to the Complainant on September 8, 2025, 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 September 8, 2025. On September 9, 2025, the Registrar transmitted to the Center additional registrant information for the disputed domain name, which was provided to the Complainant on September 10, 2025.

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 September 16, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 10, 2025. The Response was filed with the Center on October 10, 2025.

The Center appointed Mihaela Maravela, Nick J. Gardner, and Andrea Mondini as the Administrative Panel in this matter on October 28, 2025. 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

According to information in the Complaint, the Complainant has registered various trademarks consisting of “sneP”, including the Italian Trademark Registration No. 0001197564, registered on June 11, 2009, in classes 25, 32, 35, and 43, duly renewed, the European Union Trademark Registration No. 018276910, registered on November 19, 2020, in classes 3, 5, 25, 28, 30, 32, and 35, and the International Trademark Registration No. 1643204, registered on December 17, 2021, in classes 3, 5, 25, 28, 30, and 32. In addition, the Complainant has been the owner of the domain name <sneP.it> since April 15, 2017. No other information about the activities of the Complainant is included in the Complaint, apart for the information on the above trademark registrations and domain name, and the allegation that the Complainant is an official partner of a major football club since 2020, therefore benefiting from international visibility.

The disputed domain name was registered on November 13, 2000, and redirects to a Registrar parked page offering the disputed domain name for sale at USD 425,000. There is no evidence or allegation that it has ever been used in any other way.

The Respondent trades in domain names.

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 name.

Notably, the Complainant contends that the disputed domain name is identical to its SNEP trademarks.

As regards the second element, the Complainant argues that the Respondent does not hold any rights to the disputed domain name, that there is no evidence that the Respondent uses the disputed domain name or a sign corresponding to the disputed domain name in connection with an offer of goods or services in good faith, given that the website at the disputed domain name is not active, and that there is no evidence that the Respondent (as an individual, company or other organization) has been commonly known by the disputed domain name.

With respect to the third element, the Complainant argues that the Respondent has registered the disputed domain name solely for the purpose of taking advantage of the reputation of the Complainant's trademarks, as the registration of the disputed domain name by the Respondent purportedly took place after the acquisition of the trademark rights by the Complainant. The Complainant also claims that the Respondent was aware of the Complainant's SNEP trademarks because they are well known given that the Complainant is an official partner of a major football club since 2020, therefore benefiting from international visibility. Furthermore, the Complainant says that “the Respondent acted in bad faith considering that ... it sent numerous offers to sell the domain name ... asking for a disproportionate amount as shown in the attached correspondence”¹. The Respondent's bad faith is also demonstrated by the fact that the disputed domain name is publicly offered for sale for approximately EUR 425,000.00, an excessively high amount for a domain name.

¹ In fact the correspondence concerned shows a broker acting on behalf of the Respondent sending a number of emails to the Complainant asking if it was interested in buying the domain name without mentioning a price. The Complainant indicated it was interested but says it would depend on price and suggests it would be prepared to pay USD 10,000.

B. Respondent

The Respondent contends that the Complainant has not satisfied all the elements required under the Policy for a transfer of the disputed domain name.

The Respondent concedes that the Complainant has satisfied the first element of the Policy, having registered trademark rights for SNEP. However, the Respondent claims that the Complainant has failed to satisfy the second and the third elements of the Policy.

As such, the Respondent argues that merely offering a four-letter, non-distinctive, pronounceable domain name for sale is not illegitimate, as there is no evidence from which to infer that the Respondent had targeted the Complainant. In this respect, the Respondent has provided evidence that other entities also hold trademark registrations for SNEP for various goods or services, and also that the term “sneP” as an acronym may stand for diverse things - it identifies various French national organizations owing to the significance of “Syndicat National” as in the Syndicat National de l'Edition Phonographique, Syndicat National de l'Education Physique, the Syndicat National de l'Extrusion Plastique and Société Normande d'Emballages Plastique; along with other uses of SNEP as an acronym such as the Sierra Nevada Ecosystem Project, the Saudi Naval Expansion Program, Simple NDEF Exchange Protocol, and Signal-to-Noise Enhancement Program.

The Respondent has also provided evidence that it has registered many other four-letter “.com” domain names for their inherent value and claims that trade in what are otherwise nondistinctive, short and memorable domain names is not an illegitimate activity. In conclusion, and citing UDRP prior decisions, the Respondent submits that the disputed domain name has legitimate commercial value independent of the Complainant's trademark, and that that the Respondent has a reasonably legitimate interest in the substantial investment it made in the name 25 years ago.

As regards the third element, the Respondent contends that its intent in having registered the disputed domain name is unrelated to the Complainant's mark. First, the disputed domain name was registered by the Respondent's principal in 2000, while the Complainant did not yet exist at that point in time, and the earliest trademark shown by the Complainant is an Italian trademark dated November 2009. Second, even if the Complainant's trademark were prior to the disputed domain name registration, there was no bad faith intent, as the disputed domain name was acquired for its value as a valuable digital asset in the Respondent's portfolio.

With respect to the offer to sell the disputed domain name, the Respondent claims that the offer actually came upon the Complainant's own inquiries with the sales brokerage and offers to purchase the disputed domain name, and that the entire purpose of the ridiculously low USD 10,000 offer advanced repeatedly by the Complainant was an effort to manufacture evidence for this Proceeding. In conclusion, the Respondent denies having knowledge of the Complainant when the Respondent's principal originally registered the disputed domain name in 2000. The Complaint failed to show that the Respondent has used the disputed domain name for any bad faith purpose.

6. Discussion and Findings

6.1. Preliminary Matters

Paragraph 15(a) of the Rules instructs this Panel to “decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable”. Likewise, paragraph 10(d) of the Rules, provides that “the Panel shall determine the admissibility, relevance, materiality and weight of the evidence”.

6.2. Substantive Matters

To succeed, in accordance with paragraph 4(a) of the Policy, the Complainant must satisfy the Panel that:

- (i) the disputed domain name is identical with or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name;
- (iii) the disputed domain name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

The Complainant has rights in the SNEP trademark. The Panel finds the disputed domain name is identical to this trademark. It is well established that the generic Top-Level Domain ("gTLD"), in this case ".com", does not affect the disputed domain name for the purpose of determining whether it is identical or confusingly similar. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, (["WIPO Overview 3.0"](#)), section 1.11.1.

Accordingly the Panel finds that the disputed domain name is identical to the Complainant's trademark and hence the first condition of paragraph 4(a) of the Policy has been fulfilled.

B. Rights or Legitimate Interests

Given the Panel's findings in relation to bad faith (see below) the Panel does not need to determine this issue.

C. Registered and Used in Bad Faith

In respect of registration in bad faith, the Complainant typically must show that the Respondent had the Complainant's rights in mind when it registered the disputed domain name and that it proceeded with bad faith intent to target such rights. It follows that if the disputed domain name was created by the Respondent before the Complainant's trademark rights had accrued, absent any nascent or as yet unregistered rights of the Complainant, the Respondent cannot have registered the disputed domain name in bad faith (see section 3.8 of the [WIPO Overview 3.0](#)).

The Complaint provides little detail about the Complainant. The earliest trademark that the Complainant acquired was filed on February 24, 2006. The Complainant claims it has held the current corporate name since June 2014. The disputed domain name was registered on November 13, 2000. The Complainant has not indicated changes or updates to registrant contact information and none was revealed after the filing of the Complaint (the case file only shows that the disputed domain name was updated in February 2025, but there is no evidence of a change in registrant data). The Respondent submitted under oath to have held the disputed domain name since registration (initially through its principal) and there is no indication or claim to the contrary.

Accordingly, the Respondent could not have registered the disputed domain name with the Complainant or the Complainant's trademark rights in mind. Neither was a case of use in bad faith ever going to succeed where there was no evidence of illicit conduct or of targeting of the Complainant's mark.

The Complainant submitted in the Complaint to have prior rights, but did not indicate which those rights are. The Complainant did not argue that it had acquired common law trademark rights before the registration of the disputed domain name, and had actually submitted no evidence as to any products or services for which its trademarks are used. Therefore, the Complainant has provided no evidence to show that the Respondent was, or should have been, aware of the Complainant or its trademarks even at the time the Complaint was filed, and certainly not at the time the Respondent registered the disputed domain name which was before

the Complainant existed. There is also no evidence that when the Respondent registered the disputed domain name it was seeking to capitalize unfairly on any nascent rights of the Complainant (particularly noting that the Complainant was not founded yet). The Panel notes the Complainant's claim that the disputed domain name has been advertised for sale. However, the fact that the disputed domain name was made available for sale does not affect the conclusion that the Complainant has not proven registration in bad faith.

Moreover, even if the Complainant had prior trademark rights, the Panel is persuaded by the evidence put forward by the Respondent, that there are potential uses of SNEP that have nothing to do with the Complainant, and that the Respondent registered the disputed domain name for its inherent value as a four-letter acronym. There is no evidence that the Respondent has targeted the Complainant, given also the absence of any information on the extent of sales of the Complainant, if any, or its reputation. The only evidence submitted by the Complainant concerns the display of its trademark as official sponsor of a football club, but the Complainant is relying upon promotional activities dated after 2020, decades after the registration of the disputed domain name.

The Panel does not consider that the price the Respondent has advertised the domain name for sale establishes bad faith. First, if a domain name is legitimately held, the registrant is entitled to ask whatever price it likes for that name. Second, in any event the Respondent has submitted evidence that shows that pronounceable four-letter domain names in the ".com" gTLD are inherently valuable, and the price the Respondent was seeking was not out of line with prices other similar domains have achieved on sale.

As regards the allegations of the Complainant that the Respondent has provided false contact details, these are based on an allegation that the provided telephone is incorrect and the contact email relies on a free and non-professional provider. The Respondent could be contacted at the said email address and was able to respond. The Panel does not think this situation leads to an inference of the Respondent acting in bad faith.

Having in mind the above and the evidence in the case file, there is no proof that the Respondent targeted the Complainant or its trademarks at the date of the registration of the disputed domain name, therefore the Panel cannot conclude that the Respondent registered the disputed domain name in bad faith with the intent of taking advantage of the Complainant's trademark or interfering with Complainant's use of its mark.

The Complainant has not discharged the burden of showing the disputed domain name was registered and used in bad faith. Accordingly the third condition of paragraph 4(a) of the Policy has not been fulfilled, and the Complaint must fail.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking ("RDNH") or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.0](#), section 4.16.

Prior panels have found RDNH where the complainant had clear knowledge of a lack of respondent bad faith such as registration of the disputed domain name well before the complainant acquired trademark rights.

The Complaint included information showing that the disputed domain name was first registered in 2000 and provided no explanation as to how in these circumstances the Respondent could have registered the disputed domain name with the Complainant in mind. The Complainant was clearly aware that the registration date is an issue, as it requested from the Center information on the registration date for the current owner after the filing of the Complaint, with the stated purpose to amend the Complaint. Although no information was revealed by the Registrar to point to a different registrant and therefore a newer registration date, the Complainant failed to amend the Complaint, or withdraw it.

The Complainant's only ground for bad faith was that the Respondent offered the disputed domain name for sale for a large amount of money, and that the disputed domain name is listed for sale. The Complaint appears to rely on paragraphs 4(b)(i) and (ii) of the Policy. Under paragraph 4(b)(i) of the Policy, it would be evidence of registration and use in bad faith if there are circumstances indicating that the Respondent registered the disputed domain name primarily for the purpose of selling it to the Complainant or a competitor of the Complainant for a large profit. As the Complainant and its trademarks did not exist when the Respondent registered the disputed domain name, this could not have been the Respondent's primary intention at the time the Respondent registered the disputed domain name. The Complainant in this case is legally represented and the Panel considers that the Complainant knew or ought to have known that the Complaint had no reasonable prospect of success.

The Complainant should have appreciated that it would not be able to prevail on the issue of bad faith under of the Policy, and should never have filed the Complaint.

The Panel finds that the Complaint has been brought in bad faith and constitutes an attempt at Reverse Domain Name Hijacking.

7. Decision

For the foregoing reasons, the Complaint is denied.

Moreover, the Panel finds that the Complaint has been brought in bad faith and constitutes an attempt at Reverse Domain Name Hijacking.

/Mihaela Maravela/

Mihaela Maravela

Presiding Panelist

/Andrea Mondini/

Andrea Mondini

Panelist

/Nick J. Gardner /

Nick J. Gardner

Panelist

Date: November 5, 2025