Decision for dispute CAC-UDRP-108454

Case number	CAC-UDRP-108454
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Domain names	minimaxaivideo.com

Case administrator

Organization	Iveta Špiclová (Czech Arbitration Court) (Case admin)

Complainant

Organization	Shanghai Xiyu Jizhi Technology Co., Ltd.
Organization	Nanonoble PTE. LTD.

Complainant representative

Organization	Chofn Intellectual Property

Respondent

Name	Josh Walker

OTHER LEGAL PROCEEDINGS

The Panel is not aware of any other legal proceedings which are pending or decided and which relate to the disputed domain name.

IDENTIFICATION OF RIGHTS

The Complainant is the owner of the international trademarks MINIMAX, MiniMax and Minimax Intelligence in multiple categories. It obtained the Madrid registration number 842282A dated Geneva, February 2, 2024. It additionally has trademark registrations in New Zealand, 1270413 dated March 4, 2025 and The Republic of Singapore 40202417422S dated March 18, 2025.

FACTUAL BACKGROUND

The Complainant states that it founded and launched the MINIMAX brand in December 2021. The brand is widely used in connection with its artificial intelligence services and products and is commonly referred to in the market as MiniMax. Evolving from an AI startup into a comprehensive global AI platform company, the Complainant is committed to promoting the application and popularization of AI technology through advanced multimodal large models and an expansive open-source and global strategy. Complainant has a range of products, technologies and core capabilities.

MiniMax also provides AI large model bases for domestic mobile phone manufacturers including OPPO, Xiaomi, Honor and other brands, but the revenue scale of this part is relatively small, about tens of millions of RMB in 2023. According to media reports,

MiniMax's revenue is expected to exceed US$70 million in 2024, with the main source of revenue coming from MiniMax's Talkie application. In 2024, MiniMax won two important awards: selected into the Forbes China Top 50 Most Innovative Companies list and selected into the Fortune 50 AI Innovators list. Public interest in the Complainant's brand has also grown rapidly. According to Google Trends, global search interest in the terms "MiniMax" and "MiniMax AI" has increased significantly since September 2024, demonstrating the rising recognition of the Complainant's brand.

PARTIES CONTENTIONS

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COMPLAINANT

The Complainant contends that the requirements of the Policy have been met and that the disputed domain name should be transferred to it. It states in particular that Respondent registered the disputed domain name <minimaxaivideo.com> on November 3, 2024, and that it resolves to a page offering services corresponding to Complainant's that consumers will assume is an official website sponsored by Complainant. The Complainant maintains that the fact that the Respondent uses the domain to feature AI-video-related material confirms that the domain was selected not for its generic meaning, but to capitalize on the direct association with the Complainant's commercial activities.

Complainant has no business relationship with Respondent; it has not licensed the right or authorized Respondent to register and use its trademark. It is evident from Respondent 's use of the disputed domain name that the purpose for its registration is to target Complainant and consumers seeking to reach Complainant's genuine website.

Complainant contends that the Disputed Domain Name <minimaxaivideo.com> incorporates the Complainant's MINIMAX trademark in its entirety. The Complainant submits that the domain name is confusingly similar to its prior rights based on the following grounds:

1) Dominant Feature and Recognition

The MINIMAX trademark is the dominant and most distinctive element within the Disputed Domain Name. While the term "Minimax" may historically refer to a decision rule in game theory or mathematics (as noted in general references like Wikipedia), the Complainant has established substantial secondary meaning and global notoriety for the mark within the artificial intelligence sector. Since 2024, the MiniMax brand has seen an exponential surge in global public interest, becoming a primary identifier for the Complainant's high-tech services.

2) The "Targeting" Logic of Composite Terms

The Complainant contends that while "Minimax," "AI," and "Video" may individually be considered dictionary or descriptive terms, their specific combination within the Disputed Domain Name—"minimax" + "ai" + "video"—creates a composite string that points exclusively to the Complainant and its core business activities. In the current technological landscape, the addition of the suffixes 'ai' and 'video' directly corresponds to the Complainant's primary field of operation and its widely recognized expertise in AI-driven video generation. This specific combination of the MINIMAX trademark with descriptors characterizing the Complainant's core business indicates that the Respondent was acutely aware of the Complainant's market presence and specifically intended to target its commercial reputation.

3) Website Content as Evidence of Targeted Confusion Crucially, the Complainant draws the attention of the Panel to the fact that the content of the website associated with the Disputed Domain Name corresponds precisely to the Complainant's trading area. This "content-driven" alignment serves as an extrinsic indicator that the Respondent utilized the domain name specifically to target the Complainant's MINIMAX trademark and business identity.

RESPONDENT:

The Respondent has not appeared formally or informally to controvert the evidence submitted by the Complainant.

RIGHTS

The Complainant has, to the satisfaction of the Panel, shown the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy).

NO RIGHTS OR LEGITIMATE INTERESTS

The Complainant has, to the satisfaction of the Panel, shown the Respondent to have no rights or legitimate interests in respect of the Disputed Domain Name (within the meaning of paragraph 4(a)(ii) of the Policy).

BAD FAITH

The Complainant has, to the satisfaction of the Panel, shown the Disputed Domain Name has been registered and is being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy).

PROCEDURAL FACTORS

The Panel is satisfied that all procedural requirements under UDRP were met and there is no other reason why it would be inappropriate to provide a decision.

PRINCIPAL REASONS FOR THE DECISION

Paragraph 15(a) of the Rules for the UDRP ('the Policy') instructs this Panel to "decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable."

Pursuant to Paragraph 4(a) of the Policy the Complainant is required to prove each of the following three elements to obtain an order that a domain name should be cancelled or transferred:

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

In view of the Respondent's failure to submit a response, the Panel shall decide this administrative proceeding on the basis of the Complainant's undisputed representations and adduced proof pursuant to paragraphs 5(f), 14(a) and 15(a) of the Rules and draw such inferences it considers appropriate pursuant to paragraph 14(b) of the Rules. The Panel is entitled to accept all reasonable allegations and inferences set forth in the Complaint and annexes as true unless the evidence is clearly contradictory. See Vertical Solutions Mgmt., Inc. v. webnet-marketing, inc., FA 95095 (FORUM July 31, 2000) (holding that the respondent's failure to respond allows all reasonable inferences of fact in the allegations of the complaint to be deemed true); see also Talk City, Inc. v. Robertson, WIPO Case No. D2000-0009 (WIPO February 29, 2000) ("In the absence of a response, it is appropriate to accept as true all [reasonable] allegations of the Complaint.").

1. Identical or Confusingly Similar to a Mark in which Complainant has a Right:

To succeed under the first element, a complainant must pass a two-part test by first establishing that it has rights, and if it does it must then show that the disputed domain name is either identical or confusingly similar to the mark. The first element of a UDRP complaint “serves essentially 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, 3.1, section 1.7.

Here, the Complainant has established that it has rights in the word mark MINIMAX by providing the Panel with evidence that it has a registration mark for that term that predates the registration of <minimaxaivideo.com> the Disputed Domain Name. The consensus view which the Panel adopts is that a national or an international trademark registration is sufficient to establish rights in that mark. As such, the Panel finds that the Complainant has established that it has a right in the word mark MINIMAX.

The second part of the test calls for comparing the Complainant’s mark with the Disputed Domain Name. It entails “a straightforward visual or aural comparison of the trademark with the alphanumeric string in the domain name. In cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar to that mark."

The Panel observes that at the second level, the Disputed Domain Name incorporates the Complainant’s trademark together with letters ("ai") and word {"video") that are particularly associated with the Complainant’s business, thus reinforcing that the Disputed Domain Name is confusingly similar to MINIMAX. With regard to the top level domain, it does not prevent consumer confusion between the Disputed Domain Name. Further, “[a]lthough each case is judged on its own merits, in cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar to that mark.” WIPO Overview 3.1, supra. See WIPO Case No. D2006-0451, F Hoffmann-La Roche AG v. Macalve e-dominios S.A. ("It is also well established that the specific top level of a domain name such as ".com", ".org" or "net" does not affect the domain name for the purpose of determining whether it is identical or confusingly similar.").

Accordingly, Complainant has satisfied Paragraph 4(a)(i) of the Policy.

2. Determining Whether Respondent Lacks rights or legitimate interests in the Disputed Domain Name:

To establish the second of the three elements, the Complainant must first demonstrate that Respondent lacks rights and legitimate interests in the Disputed Domain Name. Recognizing that the proof for establishing this element is under the Respondent's control, the Complainant's may satisfy this burden by offering a prima facie case based on such concrete, circumstantial, or presumptive evidence as there is thus shifting the burden to the Respondent to produce evidence to overcome the presumption that it lacks rights or legitimate interests in the Disputed Domain Name.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name. It states that it did not authorize the Respondent to register the Disputed Domain Name, the Respondent is not using the domain name for any bona fide use, nor can it claim to be known by the name "MINIMAX " as it has been identified in the Whois directory as Josh Walker.

Further, the Complainant has adduced evidence based on the use of the Disputed Domain Name that Respondent is not using it for any non-commercial or fair use. See Croatia Airlines d. d. v. Modern Empire Internet Ltd., WIPO Case No. D2003-0455 (the Complainant is required to make out a prima facie case that the Respondent lacks rights or legitimate interests. Once such prima facie case is made, the Respondent carries the burden of demonstrating rights or legitimate interests in the domain name. If the Respondent fails to do so, the Complainant is deemed to have satisfied paragraph 4(a) (ii) of the Policy). See also Advanced International Marketing Corporation v. AA-1 Corp, FA 780200 (Forum November 2, 2011) (finding that a complainant must offer some evidence to make its prima facie case and satisfy Policy paragraph 4(a)(ii).

Here, the Complainant's contentions satisfy the presumptive burden that Respondent lacks rights or legitimate interests in the Disputed Domain Name. The Respondent has the opportunity to controvert the prima facie case by adducing evidence demonstrating that it has rights or legitimate interests.

The Policy sets forth the following nonexclusive list of factors:

(i) "[B]efore any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services."
(ii) "[Y]ou (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights."
(iii) "[Y]ou are making a legitimate non-commercial 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."

Evidence of any one of these defences will satisfy a respondent’s rebuttal burden, but the absence of any evidence supports a complainant's contention that the respondent lacks rights or legitimate interests in the domain name. The failure of a party to submit evidence on facts in its possession and under its control may permit the Panel to draw an adverse inference regarding those facts. See Mary-Lynn Mondich and American Vintage Wine Biscuits, Inc. v. Shane Brown, doing business as Big Daddy's Antiques, WIPO Case No. D2000-0004; also Forum Case No. FA 1773444, Ashley Furniture Industries, Inc. v. Joannet Macket/JM Consultants ("The Panel finds that Respondent's lack of content at the disputed domain shows the lack of a bona fide offering of goods or services or a legitimate noncommercial or fair use per Policy if 4(c)(i) and (iii).").

Here, the disputed domain name is confusingly similar to the Complainant's mark and resolves to a website that impersonates the Complainant by offering the identical 's products and services. Where the “only apparent purpose be to [draw] users seeking Complainant’s web site” its impersonation of the Complainant is evident. See Emerson Electric Co. v. golden humble /golden globals, Forum Claim No. FA 1787128 ("lack of evidence in the record to indicate a respondent is authorized to use [the] complainant's mark may support a finding that [the] respondent does not have rights or legitimate interests in the disputed domain name per Policy ¶ 4(c)(ii)").

As the Respondent has not controverted the evidence that it lacks right or legitimate interests in the Disputed Domain Name, and for the reasons herein stated, the Panel finds that the Complainant has satisfied Paragraph 4(a)(ii) of the Policy.

3. Registration and Use in Bad faith:

Having demonstrated that Respondent lacks rights or legitimate interests, it is the Complainant's further burden under Paragraph 4(a)(iii) of the Policy to prove that the Respondent both registered and is using the Disputed Domain Name in bad faith. It is not sufficient for a complainant to rest its case on the finding under Paragraph 4(a)(ii) of the Policy, although the fact that the Respondent lacks rights or legitimate interests in the Disputed Domain Name will be a factor in assessing Respondent’s motivation for registering a domain name in which the dominant part is identical to Complainant's mark.

The preamble to Paragraph 4(b) states: "For the purposes of Paragraph 4(a)(iii) [the finding of any of the circumstances] shall be evidence of the registration [...] of a domain name in bad faith." In the absence of a response to explain and justify its registration and use of a domain name corresponding to a well-known mark, a Panel is compelled to examine the limited record for any exonerative evidence of good faith. The Respondent has not appeared and based on the evidence of record; the Panel finds none.

The Complainant's proof in this case focuses the Panel's attention on the fourth factor. As there is no proof that would support the other factors, the Panel will not address them. Subparagraph 4(b)(iv) reads:

(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 website or location or of a product or service on the respondent's website or location.

In this case, the Respondent has registered a domain name confusingly similar to the Complainant’s mark that includes additional

words and letters referential to the Complainant's business. Indeed, as the Complainant notes "that while "Minimax," "AI," and "Video" may individually be considered dictionary or descriptive terms, their specific combination within the Disputed Domain Name —"minimax" + "ai" + "video"—creates a composite string that points exclusively to the Complainant and its core business activities. See QNX Software Systems Limited v. Jing Rung, WIPO Claim No. D2012-1597 (<qnx-phone.com>), the Panel explained: "The addition of the generic term 'phone' does not dispel confusion but strengthens it to the contrary as it exactly suggests the product manufactured by RIM, parent company of the Complainant."

Taken as a whole the Disputed Domain Name is designed to attract Internet visitors seeking to access their accounts held by Complainant. Preying on Internet user in the matter in which Complainant has demonstrated is a quintessential abuse of Complainant's right and of the Policy.

The Complainant further draws the Panel's attention to the website content associated with the Disputed Domain Name, which uses the Complainant's MiniMax logo, product videos, product images, and includes multiple advertising pages. The Respondent's unauthorized use of the Complainant's stylized logo is a clear 'smoking gun' of bad faith registration and use, as it demonstrates the Respondent had the Complainant's specific brand in mind. The Respondent's deliberate imitation of the Complainant's MINIMAX trademark and MiniMax brand for commercial gain is fully consistent with Policy 4(b)(iv), which states that registration and use of a domain name in bad faith includes intentionally attracting, for commercial gain, Internet users by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website or products thereon.

It is inconceivable to the Panel in the current circumstances that the Respondent registered the disputed domain name without prior knowledge of the Complainant and the Complainant's mark. See Sodexo v. Daniela Ortiz, D2021-0628 (WIPO May 3, 2021) (Holding, "Where a complainant's trademark is widely known, including in a particular industry, or highly specific, and respondents cannot credibly claim to have been unaware of complainant, panels have inferred that respondents knew, or should have known, that their registration would be identical or confusingly similar to a complainant's trademark").

The Panel concludes that the Complainant has adduced more than sufficient evidence that the Respondent has appropriated a well-known mark to serve an infringing and fraudulent purpose. See Royal Bank of Canada - Banque Royale Du Canada v. Registration Private, Domains By Proxy, LLC / Randy Cass, WIPO Case No. D2019-2803, the Panel noted: "It is clear that where the facts of the case establish that the respondent's intent in registering or acquiring a domain name was to unfairly capitalize on the complainant's [...] trademark, panels have been prepared to find the respondent acted in bad faith."

For the above reasons, the Panel finds that the Complainant has demonstrated that the Respondent registered and is using the Disputed Domain Name in bad faith, thus it has satisfied Paragraph 4(a)(iii) of the Policy.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

AND THE DISPUTED DOMAIN NAME(S) IS (ARE) TO BE

1. **minimaxaivideo.com**: Transferred

PANELLISTS

Name	**Gerald Levine Ph.D, Esq.**

DATE OF PANEL DECISION 2026-04-20

Publish the Decision