

Decision for dispute CAC-UDRP-108905

Case number	CAC-UDRP-108905
Time of filing	2026-08-05 13:15:06
Domain names	careers-tevapharm.com, career-tevapharm.com

Case administrator

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

Organization	Teva Pharmaceutical Industries Ltd.
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Complainant representative

Organization	SILKA AB
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Respondents

Organization	Renaissance Academy of Wisdom Private Limited
Name	Abhishek Tiwari

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 names.

IDENTIFICATION OF RIGHTS

The Complainant has demonstrated ownership of rights in the TEVA and TEVAPHARM trademarks for the purposes of standing to file a UDRP complaint.

In particular, the Complainant is the owner of trademark registrations for TEVA and TEVAPHARM including the following:

- International trademark registration No. 1319184 for TEVA (word/device), registered on June 15, 2016;
- United States trademark registration No. 1567918 for TEVA, registered on November 28, 1989;
- European Union trademark registration No. 018285645 for TEVAPHARM, registered on January 9, 2021.

The Complainant also refers to ownership over the domain names that incorporate its TEVAPHARM trademark, such as <tevapharm.com>, registered on June 14, 1996.

FACTUAL BACKGROUND

The Complainant is a pharmaceutical company engaged in the research, development, manufacture, and marketing of innovative medicines, generic pharmaceuticals, and biosimilar products. It was founded in Israel in 1944, following the merger of several pharmaceutical businesses, including one with origins dating back to 1901. The Complainant operates in 57 markets, has 30 manufacturing sites, and employs approximately 34,000 people worldwide. In 2025, the Complainant generated revenues of approximately USD 17.3 billion.

The disputed domain name <careers-tevapharm.com> was registered on July 21, 2026 and it currently resolves to an "account suspended" webpage, while the disputed domain name <career-tevapharm.com> was registered on August 3, 2026 and it does not resolve to any active website. The disputed domain names were used in connection with a fraudulent employment scheme impersonating the Complainant. In particular, according to the undisputed evidence provided by the Complainant, the Respondents used e-mail addresses corresponding to the disputed domain names to communicate with prospective candidates while falsely presenting themselves as representatives of the Complainant. The communications used the Complainant's name and logo and other elements intended to create the appearance of genuine recruitment communications. The purported recruitment process involved several rounds of interviews, following which the candidates were directed to purchase various online certifications allegedly intended to enhance their skills and qualifications as a prerequisite for receiving a formal employment offer. The Complainant has documented a number of complaints and reports from persons who were targeted through this scheme.

PARTIES CONTENTIONS

The Complainant contends that the requirements of the Policy have been met and that the disputed domain names should be transferred to it.

In particular, the Complainant argues that the disputed domain names are confusingly similar to its TEVA and TEVAPHARM trademarks as these trademarks are contained in its entirety and recognizable within the disputed domain names. Further, the Complainant contends that ".com" gTLD is viewed as a standard registration requirement and as such is disregarded from comparison between the disputed domain names and the Complainant's trademarks.

Regarding the second UDRP element, the Complainant asserts that the Respondents have no rights or legitimate interests in respect of the disputed domain names. The Respondents hold no trademark rights corresponding to the disputed domain names and have also never been commonly known by the disputed domain names. The Respondents have not been authorized, licensed, or otherwise permitted by the Complainant to use its well-known TEVA or TEVAPHARM trademarks, whether as part of the domain names or for any other purposes. The Complainant holds that since the disputed domain names are actively employed by the Respondents in connection with a fraudulent recruitment scheme, such use can never confer rights or legitimate interests on the Respondents. In particular, prospective job applicants received emails purportedly sent on behalf of the Complainant's human resources team from the email addresses configured on the disputed domain names. The fraudulent nature of these communications is further demonstrated by their email headers and signature blocks, which falsely identified the sender as the Complainant. Recipients were invited to participate in what appeared to be a legitimate recruitment process and, at some point during the recruitment process, they were informed that, in order to proceed with their applications, they needed to further strengthen their proficiency in certain technology skills and, for that purpose, they were required to obtain a skills validation certificate. Applicants were instructed to pay a fee for this certification and were falsely assured that the amount would later be reimbursed by the Complainant. A number of reports was submitted to the Complainant by victims and prospective victims of the fraud. The Complainant also submits that the disputed domain names create a strong and obvious risk of implied affiliation with the Complainant as it is highly likely that Internet users encountering the disputed domain names would mistakenly believe that they are owned, operated, authorized, or otherwise connected with the Complainant, and in particular with its recruitment and human resources activities.

With respect to the third UDRP element, the Complainant holds that the disputed domain names incorporate the Complainant's well-known TEVA and TEVAPHARM trademarks in their entirety and closely resemble the Complainant's primary domain name, <tevapharm.com>. Moreover, the Respondents have used the disputed domain names to impersonate the Complainant in connection with a phishing scheme and fraudulent recruitment scam. Taken together, these circumstances clearly demonstrate that the Respondents deliberately targeted the Complainant, its trademarks, and its business activities, and constitute compelling evidence that the disputed domain names were registered in bad faith. The Complainant also adds that the first Respondent has been named as respondent in previous UDRP proceedings, including cases involving the misuse of third-party trademarks in fraudulent phishing schemes. Since the disputed domain names were used to operate a fraudulent recruitment scheme, such conduct is not only harmful to the Complainant's reputation and business interests, but also forms part of a deliberate effort to deceive unsuspecting individuals and induce them to make payments under false pretenses. The Respondents' actions therefore constitute a clear case of impersonation and phishing, designed to mislead recipients into believing that they were participating in a legitimate recruitment process conducted by the Complainant, which constitutes additional evidence of bad faith by the Respondents.

No administratively compliant Response has been filed.

RIGHTS

The Complainant has, to the satisfaction of the Panel, shown the disputed domain names are 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 names (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 names have been registered and are 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.

Preliminary issue – Consolidation of Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple registrants pursuant to paragraph 10(e) of the Rules.

The Respondents did not comment on the Complainant's request.

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 request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 4.11.2.

As regards common control, the Panel notes that although the disputed domain names are registered by the nominally different domain name registrants, using different registrars, they share a number of commonalities, that include the following:

- Both disputed domain names share a very similar structure and consist of the word "career" or "careers", a hyphen and the Complainant's TEVAPHARM trademark, registered under the ".com" generic Top-Level Domain ("gTLD");
- Both disputed domain names were registered through the same registrar;
- Both Respondents are allegedly located in India and have provided the same contact telephone number to the registrar;
- The disputed domain names were registered in close temporal proximity, on July 21, 2026 and August 3, 2026;
- Both disputed domain names are used as a part of the same fraudulent employment scheme.

Having in mind the above, the Panel concludes that it is more likely than not that all the disputed domain names are under common control.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

PRINCIPAL REASONS FOR THE DECISION

According to paragraph 15(a) of the Rules: "A Panel shall 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." Paragraph 4(a) of the Policy stipulates that the complainant must prove each of the following:

- that the disputed domain names registered by the respondent are identical or confusingly similar to a trademark or service mark in which the complainant has rights;
- that the respondent has no rights or legitimate interests in respect of the disputed domain names; and
- that the disputed domain names have been registered and are being used in bad faith.

I. 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 names, as stipulated in section 1.7 of WIPO Overview.

The Complainant has shown rights in respect of the TEVAPHARM and TEVA trademarks for the purposes of the Policy (WIPO Overview 3.0, section 1.2.1). Although the Complainant has based its complaint on both TEVAPHARM and TEVA trademarks, the Panel holds that for the purposes of analysis of the first UDRP element, it is sufficient to take into account only TEVAPHARM trademark. Having in mind that TEVA trademark consists of single verbal element that is already contained within the TEVAPHARM trademark and that the disputed domain names reproduce TEVAPHARM trademark in its entirety, the Panel deems that analysis of both trademarks would be redundant and, as such, would not make any impact on the Panel's conclusions regarding the first UDRP element. The Panel will, where appropriate, also use the same approach in assessment of the second and the third UDRP element.

The entirety of the Complainant's trademark is reproduced within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the Complainant's trademark for the purposes of the Policy (WIPO Overview 3.1, section 1.7).

Although the addition of other terms, here "career" and "careers", may bear on the 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 Complainant's trademark for the purposes of the Policy (WIPO Overview 3.1, section 1.8).

In addition, it is well established that ".com", as a generic Top-Level Domain, can be disregarded in the assessment of the confusing similarity between the disputed domain names and the Complainant's trademark (WIPO Overview 3.1, section 1.11.1).

The Panel, therefore, finds that the first element of the Policy has been established.

II. 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.

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.

In particular, the Panel notes that there appears to be no relationship between the Respondent and the Complainant and that the Respondent is not a licensee of the Complainant, nor has the Respondent otherwise obtained an authorization to use the Complainant's TEVAPHARM trademark. There appears to be no element from which the Panel could infer the Respondent's rights and legitimate interests in the disputed domain names, or that the Respondent might be commonly known by the disputed domain names.

Furthermore, based on the undisputed evidence provided by the Complainant, the disputed domain names are used to impersonate the Complainant in connection with a fraudulent recruitment scheme. Panels have categorically held that the use of a domain name for illegitimate activity (here, claimed fraud and impersonation) can never confer rights or legitimate interests on a respondent (WIPO Overview 3.1, section 2.13.1).

The Panel also finds that the structure of the disputed domain names, which contains the Complainant's TEVAPHARM trademark in combination with the terms "career" and "careers", carries a high risk of implied affiliation (see WIPO Overview 3.1, section 2.5.1).

Having in mind the above, the Panel finds the second element of the Policy has been established.

III. 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 domain names in bad faith.

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 (see WIPO Overview 3.1, section 3.2.1).

Regarding the registration of the disputed domain names in bad faith, the Panel holds that the Respondent had the Complainant in

mind when registering the disputed domain names. The Complainant’s TEVAPHARM trademark has been registered and used for a number of years before the Respondent registered the disputed domain names, so it is unlikely that the Respondent was not aware of this trademark. Furthermore, the use of the disputed domain names for fraudulent employment campaign leaves no room for doubt on the Respondent’s knowledge of the Complainant and its TEVAPHARM trademark and evidences that the Respondent actually had the Complainant in mind when registered the disputed domain names.

Additionally, the Respondent's record shows a clear intent to target third-party trademarks, as the Respondent has been a party to a number of previous UDRP proceedings, all of which were decided against the Respondent. Such behavior constitutes a pattern of conduct preventing a trademark holder from reflecting its mark in a domain name in accordance with paragraph 4(b)(ii) of the Policy (see also WIPO Overview 3.1, section 3.1.2).

Due to the above, the Panel finds that the disputed domain names have been registered in bad faith.

As indicated above, based on the undisputed evidence provided by the Complainant, the disputed domain names are used to impersonate the Complainant in connection with a fraudulent recruitment scheme. Such behavior manifestly indicates bad faith on the Respondent’s side. In that sense, panels have held that the use of a domain name for illegitimate activity (such as claimed fraud and impersonation) constitutes bad faith (WIPO Overview 3.1, section 3.4). Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain name constitute bad faith under the Policy.

The Panel finds that the disputed domain names have been both registered and are being used in bad faith, and consequently that the Complainant has established the third element of the Policy.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

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

- 1. careers-tevapharm.com: Transferred
- 2. career-tevapharm.com: Transferred

PANELLISTS

Name	Stefan Bojovic
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DATE OF PANEL DECISION 2026-09-21

Publish the Decision