**ARAB CENTER FOR DISPUTE RESOLUTION**

**P.O. BOX 921 100**

**AMMAN 11192 JORDAN**

**ACDR Complaint Form**

**In the Matter of the Request for Domain Name Dispute Resolution**

I) IDENTITY and CONTACT INFORMATION OF PARTIES INVOLVED
1. Complainant   (add name of party or entity)
is hereby submitting the complaint herein for decision pursuant to the UDRP Policy, which was approved by ICANN, October 24, 1999, the UDRP Rules, approved October 30, 2009,  and the Supplemental Rules  of the Arab Center for Dispute Resolution.

2. Indicate Domain Names in dispute/trademark upon which complaint is based: (Please provide Information and detailed list):

3. Complete contact details for Registrar(s) of domain name(s):
Provide Registrar Name
Postal Address
Tel.:
Fax:
Email:

4. Contact details of Parties/Entities: Any written communication to Complainant, Respondent, or Panelists shall be via electronic mail :

a. Contact Information for Complainant:
Name:
Address:
Tel. :
Fax :
Email:
Principal Place of Business
Place of Incorporation
Legal Status:

b. Indicate the person designated to manage mommunications
Name
Address
Tel. :
Fax :
Email:

c. Authorized representative of complainant
Name:
Address:
Tel. :
Fax :
Email:

d. Contact information for Respondent (most recent known contact) :
Name:
Address:
Tel. :
Fax :
Email:
Principal Place of Business
Place of Incorporation
Legal Status
e. Contact information for authorized representative  of Respondent’s (most recent known contact) :
Name:
Address:
Tel. :
Fax:
Email:

5. FORMAT OF COMPLAINT

1. A general statement by Complainant on the facts that arise:

2. Legal rounds of Complaint must demonstrate:

I) **the domain name(s) is/are identical or confusingly similar** to a trademark or service mark in which the Complainant has rights.

II) the Respondent**(domain-name holder) should be considered as having no rights or legitimate interests** in respect of the domain name(s) that is/are the subject of the complaint.  UDRP Rule 3(b)(ix)(2); UDRP Policy  4(a)(ii).

 [The Panel may consider any relevant aspects included in, but not limited to, UDRP Policy ¶ 4(c):

(i.) Whether, before any notice to the Respondent of the dispute, Respondent’s use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name is in connection with a bona fide offering of goods or services; or

 (ii.) Whether Respondent (as an individual, business, or other organization) has been commonly known by the domain name, even if Respondent has not acquired trademark or service mark rights; or

 (iii.) Whether Respondent is making a legitimate noncommercial 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.]

III) An Administrative Panel shall**find Evidence of Registration and Use in Bad Faith in the following circumstances,** in particular but without limitation, if found to be present, shall be evidence of the registration and use of a domain name in bad faith where: . UDRP Rule 3(b)(ix)(3); UDRP Policy 4(a)(iii).

 [The Panel may consider any relevant aspects included in, but not limited to UDRP Policy ¶ 4(b):
IV)

1.  Circumstances indicating registration or the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the Complainant who is the owner of the trademark or service mark or to a competitor of that Complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or

2. Demonstration of the registration of the domain name is in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

3.  Demonstration that the registration the domain name is primarily for the purpose of disrupting the business of a competitor; or

4. By using the domain name, demonstrating that intentional attempt to attract, for commercial gain, Internet users to your website or other on-line location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of your website or location or of a product or service on your website or location

5. The relief or remedy sought:

6. Designation of Panelists:
Single Panel Member or 3 Panel Member:

a. Where a single panel arbitration is chosen by both parties, provide Name of 3 Candidates to serve. The panelist is designated by the service provider within 5 days of receipt of Complaint and the fee in its entirety is paid by the Complainant:

b. For a 3 member panel, 3 candidate names may be selected from the  Providers’ list of Panelists:

7. Whether there are any other legal proceedings either in process or terminated in connection with the complaint?

8. Indicate the trademark(s) upon which the complaint is based and a description of the services provided under this mark:

9.  Jurisdiction:
The Complainant shall submit, with respect to any challenges to a decision in the administrative proceeding canceling or transferring the domain name(s), to the jurisdiction of the courts in at least one specified mutual jurisdiction.
(indicate appropriate answer)
1. The domain-name holder’s place of domicile, as shown for the registration of the domain name(s) in the concerned Registrar’s Whois database at the time of the submission of the Complaint to the Center.

2. The location of the principal office of the concerned Registrar AND the domain-name holder’s address, as shown for the registration of the domain name(s) in the concerned Registrar’s Whois database at the time of the submission of the Complaint to the Center.

3. The relevant Registrars’ principal office

REPRESENTATIONS AND CERTIFICATIONS
The Complainant agrees that its claims and remedies concerning the registration of the domain name, the dispute, or the dispute’s resolution shall be solely against the domain-name holder and waives all such claims and remedies against (a) ACDR, its directors, officers, employees, and agents or any of its Offices, or any Panelist(s), except in the case of deliberate wrongdoing, (b) the Registrar, (c) the registry administrator, and (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

The Complainant certifies the information contained in the Complaint herein is to the best of the Complainant’s knowledge, complete and accurate, that this Complaint is not being presented for any improper or frivolous purpose, such as to harass, and that the assertions in this Complaint are warranted under the Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Respectfully Submitted,

Signature:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_   Date:

Name and position (please print):