

ADMINISTRATIVE PANEL DECISION

Early Warning Services, LLC v. Zelle Pay; Online Payment, Zelle payment; Crystal Bonadona, Crystal Bonadona; James Hines; Zelle Pay, Zelle Pay; Zelle Pay; Zelle Pay, Zelle Pay; liza freeman; Early Warning LLC, Zelle; Hung Lee, zelle pay; Zelle Pay; Zelle Pay; Justin Keys; tffuygi dfchgvj; Zelle Pay; zelle pay, zelle pay; Etransfer; Zelle Pay, Zelle Pay; Zelle Pay, Zelle Pay; Zelle Pay, Zelle Pay; Zelle, Zelle; Zelle Pay, ZELLE; Zelle Pay; Zelle Pay, Zelle Pay; Zelle Pay, Zelle Pay; Zelle Pay; Zelle Pay; Zelle Pay, Zelle Pay; Zelle Pay; Zelle Pay, Zelle Pay; Zelle Pay, Zelle; Zelle Pay, Zelle; Zelle Pay, Zelle Pay; judith canaday; Zellepay Business, Zellepy; liza freeman; Zelle Pay; Zelle Payment, Zelle; Zelle Pay; Wrld Moon; zelle pay, zelleserviceintl.com; Zelle Pay, Zellepay; Zelle; Zelle Support, Zelle Support; Zelle Pay; and Zelle Support, Zelle Support
Case No. D2023-2025

1. The Parties

The Complainant is Early Warning Services, LLC, United States of America (“United States”), represented by Bryan Cave Leighton Paisner, United States.

The Respondents are Zelle Pay, Nigeria; Online Payment, Zelle payment, United States; Crystal Bonadona, Crystal Bonadona, United States; James Hines, United States; Zelle Pay, Zelle Pay, United States; Zelle Pay, United States; Zelle Pay, Zelle Pay, United States; liza freeman, United States; Early Warning LLC, Zelle, Nigeria; Hung Lee, zelle pay, United States; Zelle Pay, United States; Zelle Pay, United States; Justin Keys, United States; tffuygi dfchgvj, United States; Zelle Pay, Nigeria; zelle pay, zelle pay, Nigeria; Etransfer, United States; Zelle Pay, Zelle Pay, Nigeria; Zelle Pay, Zelle Pay, United States; Zelle Pay, Zelle Pay, Nigeria; Zelle, Zelle, United States; Zelle Pay, ZELLE, Nigeria; Zelle Pay, Nigeria; Zelle Pay, Zelle Pay, United States; Zelle Pay, Zelle Pay, Nigeria; Zelle Pay, United States; Zelle Pay, Nigeria; Zelle Pay, Zelle Pay, Australia; Zelle Pay, United States; Zelle Pay, Zelle Pay, United States; Zelle Pay, Zelle, United States; Zelle Pay, Zelle, Nigeria; Zelle Pay, Zelle Pay, Nigeria; judith canaday, United States; Zellepay Business, Zellepy, Nigeria; liza freeman, United States; Zelle Pay, United States; Zelle Payment, Zelle, Nigeria; Zelle Pay, Nigeria; Wrld Moon, United States; zelle pay, zelleserviceintl.com, United States; Zelle Pay, Zellepay, United States; Zelle, United States; Zelle Support, Zelle Support, Nigeria; Zelle Pay, United States; and Zelle Support, Zelle Support, Nigeria.

2. The Domain Names and Registrars

The disputed domain names <businesszellepay.com>, <securedzelle.net>, <securezelle.com>, <zellealertbanking.net>, <zellebankings.com>, <zellebankingservice.com>, <zellebanksupport.com>, <zellebilling.com>, <zelleboa.com>, <zelle-customerhelp.com>, <zellecustomerhelp.net>, <zelleinccpay.com>, <zellelimits.info>, <zelleofficial.info>, <zelleonlineservices.org>, <zelleonlinetransfers.com>, <zellepaybankings.com>, <zellepaybankingtransfer.org>, <zellepaybanks.net>, <zellepaybtc.com>, <zelle-pay.business>, <zellepayhelp.org>, <zellepayinternetbanking.com>, <zellepaymentbanking.app>, <zellepaymente-mail.net>, <zellepaymentsserver.org>, <zellepaymentservice.org>, <zellepaymsn.com>, <zelle-pay.net>, <zellepayport.org>, <zellepaysupp.com>, <zellepaysupporte-mail.com>, <zellepaysupportemail.com>, <zellepaysupportline.com>, <zellepaysystemtransferservice.com>, <zelle-pay-transactions.com>, <zellepayupdate.org>, <zellereceipt.com>, <zellereceipt1.com>, <zellerepaymentbusiness.com>, <zellereview.com>, <zellesafetransfer.com>, <zelleserve.com>, <zelleserviceintl.com>, <zellesupporte-mail.com>, <zellesupportonline.com>, <zelleteamsupport.com>, <zellewebpayment.com>, and <zelleworkbusiness.com> (the “Domain Names”) are registered with Google LLC (the “Registrar”).

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on May 4, 2023. On May 8, 2023, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Names. On May 9, 2023, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Names, which differed from the named Respondent (Contact Privacy Inc. Customer 7151571251) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 19, 2023, 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 May 23, 2023.

The Registrar also indicated that the language of the Registration Agreement for the disputed domain name <zelleteamsupport.com> is Polish. On May 30, 2023, the Center sent an email communication to the Parties inviting the Complainant to submit satisfactory evidence of an agreement between the Complainant and the Respondent to the effect that the proceedings should be in English; or submit a request for English to be the language of the administrative proceedings; or submit the Complaint translated into one of the languages of the registration agreements for the Domain Names (English or Polish), including a request for that language to be the language of the administrative proceedings. The Respondent was also invited to comment on the language of the proceeding. On May 30, 2023, the Complainant reconfirmed its request that English be the language of the proceedings. The Respondent did not provide any comments regarding the language of the proceedings.

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 in English and Polish, and the proceedings commenced on June 8, 2023. In accordance with the Rules, paragraph 5, the due date for Response was June 28, 2023. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 4, 2023.

The Center appointed Piotr Nowaczyk as the sole panelist in this matter on July 24, 2023. 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

The Complainant is a digital payments network. Its service enables individuals to electronically transfer money between bank accounts. In 2022, the Complainant processed 2.3 billion transactions totaling USD 629 billion in payments.

The Complainant is the owner of numerous ZELLE trademark registrations, including:

- the United States Trademark Registration for ZELLE, No. 5,277,307 registered on August 29, 2017;
- the United States Trademark Registration for ZELLE, No. 5,312,400 registered on October 17, 2017;
- the United States Trademark Registration for ZELLE, No. 5,449,234 registered on April 17, 2018;
- the European Union Trademark Registration for ZELLE, No. 015321292 registered on January 5, 2017;
- the European Union Trademark Registration for ZELLE, No. 015321318 registered on January 12, 2017; and
- the United States Trademark Registration No. 5,938,276 for ZELLEPAY, registered on December 17, 2019.

The Complainant is also the owner of the domain names incorporating its ZELLE trademark, including <zelle.com> and <zellepay.com>.

The disputed domain name <businesszellepay.com> was registered on July 21, 2022.

The disputed domain name <securedzelle.net> was registered on July 21, 2022.

The disputed domain name <securezelle.com> was registered on August 1, 2022.

The disputed domain name <zellealertbanking.net> was registered on October 6, 2022.

The disputed domain name <zellebankings.com> was registered on August 1, 2022.

The disputed domain name <zellebankingservice.com> was registered on October 7, 2022.

The disputed domain name <zellebankssupport.com> was registered on August 1, 2022.

The disputed domain name <zellebilling.com> was registered on October 7, 2022.

The disputed domain name <zelleboa.com> was registered on July 21, 2022.

The disputed domain name <zelle-customer care.com> was registered on October 10, 2022.

The disputed domain name <zellecustomerhelp.net> was registered on October 25, 2022.

The disputed domain name <zelleinipay.com> was registered on October 20, 2022.

The disputed domain name <zellelimits.info> was registered on October 8, 2022.

The disputed domain name <zelleofficial.info> was registered on October 6, 2022.

The disputed domain name <zelleonlineservices.org> was registered on October 5, 2022.

The disputed domain name <zelleonlinetransfers.com> was registered on October 7, 2022.

The disputed domain name <zellepaybankings.com> was registered on August 1, 2022.

The disputed domain name <zellepaybankingtransfer.org> was registered on October 9, 2022.

The disputed domain name <zellepaybanks.net> was registered on August 1, 2022.

The disputed domain name <zellepaybtc.com> was registered on July 26, 2022.

The disputed domain name <zelle-pay.business> was registered on October 7, 2022.

The disputed domain name <zellepayhelp.org> was registered on October 22, 2022.

The disputed domain name <zellepayinternetbanking.com> was registered on July 30, 2022.

The disputed domain name <zellepaymentbanking.app> was registered on October 11, 2022.

The disputed domain name <zellepaymentemail.net> was registered on October 4, 2022.

The disputed domain name <zellepaymentserver.org> was registered on October 23, 2022.

The disputed domain name <zellepaymentservice.org> was registered on October 8, 2022.

The disputed domain name <zellepaymsn.com> was registered on July 26, 2022.

The disputed domain name <zelle-pay.net> was registered on July 29, 2022.

The disputed domain name <zellepayport.org> was registered on October 5, 2022.

The disputed domain name <zellepaysupp.com> was registered on October 20, 2022.

The disputed domain name <zellepaysupportemail.com> was registered on October 8, 2022.

The disputed domain name <zellepaysupportemail.com> was registered on October 8, 2022.

The disputed domain name <zellepaysupportline.com> was registered on July 26, 2022.

The disputed domain name <zellepaysystemtransferservice.com> was registered on July 21, 2022.

The disputed domain name <zelle-pay-transactions.com> was registered on October 22, 2022.

The disputed domain name <zellepayupdate.org> was registered on October 10, 2022.

The disputed domain name <zellereceipt.com> was registered on October 8, 2022.

The disputed domain name <zellereceipt1.com> was registered on October 20, 2022.

The disputed domain name <zellerepaymentbusiness.com> was registered on October 7, 2022.

The disputed domain name <zellereview.com> was registered on July 26, 2022.

The disputed domain name <zellesafetransfer.com> was registered on October 22, 2022.

The disputed domain name <zelleserve.com> was registered on October 24, 2022.

The disputed domain name <zelleserviceintl.com> was registered on October 22, 2022.

The disputed domain name <zellesupporte-mail.com> was registered on October 7, 2022.

The disputed domain name <zellesupportonline.com> was registered on October 9, 2022.

The disputed domain name <zelleteamsupport.com> was registered on July 22, 2022.

The disputed domain name <zellewebpayment.com> was registered on July 21, 2022.

The disputed domain name <zelleworkbusiness.com> was registered on October 22, 2022.

At the time of submitting the Complaint, all the Domain Names resolved to inactive websites. As of the date of this decision, the Domain Names still resolve to inactive websites.

5. Parties' Contentions

A. Complainant

According to the Complainant, each of the three elements specified in paragraph 4(a) of the Policy are satisfied in the present case.

First, the Complainant submits that the Domain Names are confusingly similar to the ZELLE trademark in which the Complainant has rights.

Second, the Complainant argues that the Respondent has neither rights nor legitimate interests in the Domain Names.

Third, the Complainant contends that the Domain Names were registered and are being used in bad faith.

B. Respondent

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

6. Discussion and Findings

6.1. Preliminary Matters

A. Language of the Proceeding

The language of the Registration Agreement for the disputed domain name <zelleteamsupport.com> is Polish. Paragraph 11(a) of the Rules provides that "unless otherwise agreed by the Parties, or specified otherwise in the Registration Agreement, the language of the administrative proceeding shall be the language of the Registration Agreement, subject to the authority of the Panel to determine otherwise, having regard to the circumstances of the administrative proceeding". The Panel may also order that any documents submitted in a language other than that of the proceeding be translated.

As noted by previous UDRP panels, paragraph 11 of the Rules must be applied in accordance with the overriding requirements of paragraphs 10(b) and 10(c) of the Rules that the parties are treated equally, that

each party is given a fair opportunity to present its case, and that the proceeding takes place with due expedition (see, e.g., *General Electric Company v. Edison Electric Corp. a/k/a Edison Electric Corp. General Energy, Edison GE, Edison-GE and EEEGE.COM*, WIPO Case No. [D2006-0334](#)).

The Complainant has submitted a request that the language of the proceeding be English. The Complainant notes that the Registrar for all the Domain Name is based in the United States and lists an English registration agreement on its website. Moreover, the Complainant submits that the Respondent's addresses for some of the Domain Names are located in Nigeria where the official language is English. Furthermore, the Complainant notes that the Domain Names are composed of the Complainant's ZELLE and ZELLEPAY trademarks and various English words. Finally, the Complainant argues that the Domain Names resolve to inactive websites. None of them feature content in Polish or otherwise suggests that Polish would be an appropriate or relevant language to these proceedings.

The Panel finds that substantial additional expense and delay would likely be incurred if the Complaint had to be translated into Polish. Moreover, the Panel notes that the Respondent did not comment on the language of the proceeding.

Thus, taking these circumstances into account, the Panel finds that it is appropriate to exercise its discretion and allow the proceeding to be conducted in English.

B. Consolidation of the multiple Domain Names

Paragraph 3(c) of the Rules provides that the complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder. Moreover, pursuant to section 4.11.2 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), where a complaint is filed against multiple respondents, panels look at whether (i) the domain names or corresponding websites are subject to common control, and (ii) the consolidation would be fair and equitable to all parties. Procedural efficiency would also underpin panel consideration of such a consolidation scenario.

In the present case, the Panel finds that various commonalities between the Domain Names provide sufficient evidence that they are most likely subject to a common control.

First, all the Domain Names follow similar naming patterns. They are composed of the Complainant's ZELLE trademark and additional terms in English.

Second, all the Domain Names were registered between July 21 and October 25, 2022.

Third, all the Domain Names were registered with the same Registrar.

Fourth, for all the Domain Names the registrant information was hidden by the privacy protection service – Contact Privacy Inc. Customer 7151571251 (where "7151571251" is a unique customer identification number).

Fifth, at the time of submitting the Complaint all the Domain Names resolved to inactive websites. As of the date of this decision, the Domain Names still resolve to inactive websites.

Lastly, the Respondent has not denied that the Domain Names are under a common control.

Accordingly, the Panel finds that the Domain Names are most likely subject to a common control for the purposes of these proceedings. Thus, the Panel permits the consolidation of the proceedings and refers to all the registrants of the Domain Names as the "Respondent".

6.2. Substantive Matters – Three Elements

Paragraph 4(a) of the Policy places a burden on the Complainant to prove the presence of three separate elements, which can be summarized as follows:

- (i) the Domain Names are identical 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 the Domain Names; and
- (iii) the Domain Names have been registered and are being used in bad faith.

The requested remedy may only be granted if the above criteria are met.

At the outset, the Panel notes that the applicable standard of proof in UDRP cases is the “balance of probabilities” or “preponderance of the evidence”. See section 4.2 of the [WIPO Overview 3.0](#).

A. Identical or Confusingly Similar

Under the first requirement, the Complainant must establish that the Domain Names are identical or confusingly similar to the trademark in which the Complainant has rights.

The Complainant holds valid ZELLE and ZELLEPAY trademarks registrations. The Domain Names incorporate this trademark in its entirety. As numerous UDRP panels have held, incorporating a trademark in its entirety is sufficient to establish that a domain name is identical or confusingly similar to a registered trademark (see *PepsiCo, Inc. v. PEPSI, SRL (a/k/a P.E.P.S.I.) and EMS COMPUTER INDUSTRY (a/k/a EMS)*, WIPO Case No. [D2003-0696](#)).

The addition of additional terms as “business”, “pay”, “secured”, “secure”, “alertbanking”, “bankings”, “bankingservice”, “bankssupport”, “billing”, “boa”, “-customercare”, “customerhelp”, “incpay”, “limits”, “official”, “onlineservices”, “onlinetransfers”, “paybankings”, “paybankingtransfer”, “paybanks”, “paybtc”, “-pay”, “payhelp”, “payinternetbanking”, “paymentbanking”, “paymente-mail”, “paymentsserver”, “paymentservice”, “paymsn”, “-pay.net”, “payport”, “paysupp”, “paysupporte-mail”, “paysupportemail”, “paysupportline”, “paysystemtransferservice”, “-pay-transactions”, “payupdate”, “receipt”, “receipt1”, “repaymentbusiness”, “review”, “safetransfer”, “serve”, “serviceintl”, “supporte-mail”, “supportonline”, “teamsupport”, “webpayment”, and “workbusiness” in the Domain Names does not prevent a finding of confusing similarity between the Domain Names and the Complainant’s trademarks. UDRP panels have consistently held that where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element. See section 1.8, [WIPO Overview 3.0](#).

The generic Top-Level Domains (“gTLDs”) “.com”, “.net”, “.info”, “.org”, “.business” and “.app” in the Domain Names are viewed as a standard registration requirement and as such are disregarded under the first element confusing similarity test. See section 1.11.1, [WIPO Overview 3.0](#).

Given the above, the Panel finds that the Domain Names are confusingly similar to the ZELLE and ZELLEPAY trademarks in which the Complainant has rights. Thus, the Complainant has proved the requirements under paragraph 4(a)(i) of the Policy.

B. Rights or Legitimate Interests

Under the second requirement, the Complainant must prove that the Respondent has no rights or legitimate interests in the Domain Names.

The respondent may establish a right or legitimate interest in the domain name by demonstrating in accordance with paragraph 4(c) of the Policy any of the following:

- (i) that it has used or made 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 prior to the dispute; or
- (ii) that it is commonly known by the domain name, even if it has not acquired any trademark rights; or
- (iii) that it 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.

Although given the opportunity, the Respondent has not submitted any evidence indicating that any of the circumstances foreseen in paragraph 4(c) of the Policy are present in this case.

On the contrary, it results from the evidence on record that the Complainant's ZELLE and ZELLEPAY trademarks registrations predate the Respondent's registration of the Domain Names. There is no evidence in the case record that the Complainant has licensed or otherwise permitted the Respondent to use the ZELLE and ZELLEPAY trademarks or to register the Domain Names incorporating this trademark. There is also no evidence to suggest that the Respondent has been commonly known by the Domain Names.

Moreover, it results from the evidence on record that the Respondent does not make use of the Domain Names in connection with a *bona fide* offering of goods or services, nor does it make a legitimate noncommercial or fair use of the Domain Names. On the contrary, at the time of submitting the Complaint and as of the date of this Decision, the Domain Names have resolved to inactive websites. In fact, it does not result from the case evidence that the Domain Names have been used in any active way to date.

Given the above, the Panel concludes that the Complainant has also proved the requirement under paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

Under the third element, the Complainant must prove that the Domain Names were registered and are being used in bad faith.

Bad faith under the UDRP is broadly understood to occur where a respondent takes unfair advantage of or otherwise abuses a complainant's mark. See section 3.1, [WIPO Overview 3.0](#).

Under paragraph 4(b) of the Policy, evidence of bad faith registration and use includes without limitation:

- (i) circumstances indicating the domain name was registered or acquired primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the owner of a trademark or to a competitor of the trademark owner, for valuable consideration in excess of the documented out-of-pocket costs directly related to the domain name; or
- (ii) circumstances indicating that the domain name was registered in order to prevent the owner of a trademark from reflecting the mark in a corresponding domain name, provided it is a pattern of such conduct; or
- (iii) circumstances indicating that the domain name was registered primarily for the purpose of disrupting the business of a competitor; or
- (iv) circumstances indicating that the domain name has intentionally been used in an attempt to attract, for commercial gain, Internet users to a website or other online location, by creating a likelihood of confusion with a trademark as to the source, sponsorship, affiliation, or endorsement of the website or location or of a product or service on a website or location.

As indicated above, the Complainant's rights in the ZELLE and ZELLEPAY trademarks predate the registration of the Domain Names. This Panel finds that the Respondent was or should have been aware of

the Complainant's trademark at the time of registration, as it has been proven to the Panel's satisfaction that the Complainant's ZELLE and ZELLEPAY trademarks are well known and unique to the Complainant. Thus, the Respondent could not possibly ignore the reputation of services under this trademark. In sum, the Respondent registered the Domain Names with the expectation of taking advantage of the reputation of the Complainant's ZELLE and ZELLEPAY trademarks.

Moreover, as of the date of this Decision, as well as at the time of submitting the Complaint, the Domain Names have resolved to inactive websites. Considering the overall circumstances of this case, the Panel finds that the Respondent's passive holding of the Domain Names does not prevent a finding of bad faith. As numerous UDRP panels have held, passive holding, under the totality of circumstances of the case, would not prevent a finding of bad faith under the Policy. See section 3.3 of the [WIPO Overview 3.0](#). Here, given the well-known nature of the Complainant's trademark, the Respondent's failure to participate in the proceeding, and the implausible good faith use to which the Domain Names may be intrinsically put, the Panel agrees with the above.

Furthermore, the Complainant has proven that the Respondent engaged in a pattern of conduct of preventing the Complainant from reflecting its ZELLE and ZELLEPAY trademarks in multiple domain names. See *Early Warning Services, LLC v. Zelle Support et al*, WIPO Case No. [D2022-4480](#).

Finally, the Respondent's use of privacy services that concealed registrant information is a further evidence of bad faith.

For the reasons discussed above, the Panel finds that the Complainants have proved the requirements under paragraph 4(a)(iii) of the Policy.

7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the Domain Names, <businesszellepay.com>, <securedzelle.net>, <securezelle.com>, <zellealertbanking.net>, <zellebankings.com>, <zellebankingservice.com>, <zellebankssupport.com>, <zellebilling.com>, <zelleboa.com>, <zelle-customer care.com>, <zellecustomerhelp.net>, <zelleincpay.com>, <zellelimits.info>, <zelleofficial.info>, <zelleonlineservices.org>, <zelleonlinetransfers.com>, <zellepaybankings.com>, <zellepaybankingtransfer.org>, <zellepaybanks.net>, <zellepaybtc.com>, <zelle-pay.business>, <zellepayhelp.org>, <zellepayinternetbanking.com>, <zellepaymentbanking.app>, <zellepaymentemail.net>, <zellepaymentsserver.org>, <zellepaymentservice.org>, <zellepaymsn.com>, <zelle-pay.net>, <zellepayport.org>, <zellepaysupp.com>, <zellepaysupportemail.com>, <zellepaysupportemail.com>, <zellepaysupportline.com>, <zellepaysystemtransferservice.com>, <zelle-pay-transactions.com>, <zellepayupdate.org>, <zellereceipt.com>, <zellereceipt1.com>, <zellerepaymentbusiness.com>, <zellereview.com>, <zellesafetransfer.com>, <zelleserve.com>, <zelleserviceintl.com>, <zellesupportemail.com>, <zellesupportonline.com>, <zelleteamsupport.com>, <zellewebpayment.com>, and <zelleworkbusiness.com> be transferred to the Complainant.

/Piotr Nowaczyk/

Piotr Nowaczyk

Sole Panelist

Date: August 2, 2023