

ADMINISTRATIVE PANEL DECISION

WhatsApp LLC v. Muhammad Ramzan
Case No. DCO2025-0009

1. The Parties

The Complainant is WhatsApp LLC, United States of America (“United States”), represented by Hogan Lovells (Paris) LLP, France.

The Respondent is Muhammad Ramzan, Pakistan.

2. The Domain Name and Registrar

The disputed domain name <whatsappplus.co> is registered with Dynadot Inc (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 28, 2025. On January 29, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 29, 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 (REDACTED FOR PRIVACY, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 30, 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 February 3, 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 February 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was February 26, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on February 27, 2025.

The Center appointed Peter Burgstaller as the sole panelist in this matter on March 5, 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

The Complainant is a provider of one of the world's most popular mobile messaging applications which allows users to exchange messages via smartphones (Annex 6 to the Complaint).

The Complainant owns several trademark registrations containing the mark WHATSAPP, inter alia:


- United States Trademark (word), Registration No. 3939463, registered on April 5, 2011;
- European Union Trade Mark (word), No. 009986514, registered October 25, 2011; and
- International Registration (word), Registration No. 1085539, registered May 24, 2011, designated for numerous jurisdictions around the world (Annex 9 to the Complaint).

Moreover, the Complainant holds figurative trademark registrations for its logo  under International Registration No. 1109890, registered January 10, 2012, designated for multiple jurisdictions around the world (Annex 9 to the Complaint).

The Complainant also owns numerous domain names comprising the WHATSAPP mark, especially the domain name <whatsapp.com>, registered September 4, 2008, under which its main website is available (Annex 5 and 7 to the Complaint).

Furthermore, the Complainant has developed a strong online presence by being active on various social-media forums, especially Facebook, X (formerly known as "Twitter"), YouTube, and LinkedIn (Annex 8 to the Complaint).

The disputed domain name was registered on November 25, 2023 (Annex 2 to the Complaint).

At the time of filing the Complaint the disputed domain name resolved to a website that purported to offer for download a plus version of the Complainant's app with advanced features under the logo  and featuring the mark WHATSAPP (Annex 10 to the Complaint).

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 names.

Notably, the Complainant contends that the WHATSAPP trademark is famous and well-known; it notes that the disputed domain name entirely incorporates such trademark. It only adds the letters "lus", creating a visual and phonetic impression of the term "plus", under the country code Top-Level Domain ("ccTLD") ".co".

Further, the Complainant alleges that there is no legal relationship between the Complainant and the Respondent and the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services.

Finally, the Complainant submits that the Respondent was aware of the Complainant and its trademarks when registering the disputed domain name and the disputed domain name resolved to a website purporting to provide a "plus" version of the Complainant's app with advanced features, under the a very similar logo to the one of the Complainant and by using the Complainant's mark WHATSAPP. In doing so, the Respondent

used the disputed domain name to prominently display and reproduce – without authorization – the Complainant’s various intellectual property, including the Complainant’s WHATSAPP marks.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, the Complainant must prove that:

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

A. 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 name. [WIPO Overview 3.0](#), section 1.7.

The Complainant submitted evidence, which incontestably and conclusively establishes rights in the mark WHATSAPP.

In the present case the disputed domain name is confusingly similar to the WHATSAPP mark in which the Complainant has rights since it only adds the letters “lus” to the WHATSAPP mark. It has long been established under UDRP decisions that adding terms to a trademark, here, the mere addition of the letters “lus”, does not prevent a finding of confusing similarity under the first element of the Policy if the relevant trademark remains recognizable within the disputed domain name ([WIPO Overview 3.0](#), section 1.8). The Complainant’s famous and well-known trademark WHATSAPP is still recognizable in the disputed domain name.

Finally, it has also long been held that ccTLDs are generally disregarded when evaluating the confusing similarity between a disputed domain name and a trademark. [WIPO Overview 3.0](#), section 1.11.

Based on the available record, the Panel finds the first element of the Policy has been established.

B. 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.

While 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 often impossible 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. If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name, since it has never assigned,

granted, licensed, sold, transferred or in any way authorized the Respondent to register or use the WHATSAPP trademark in any manner. The Respondent did not reply and hence has not rebutted the Complainant's contentions.

Further, the Complainant focuses on the fact that its trademark is famous and well known around the world and registered in a variety of jurisdictions around the world. The Complainant provided suitable evidence of its reputation, adding that it is inconceivable that the Respondent would not have been aware of this when registering the disputed domain name.

Moreover, given the composition of the disputed domain name, adding the letters "lus" to the Complainant's trademark which create the visual and phonetic impression of the term "plus", coupled with the use of the disputed domain name to resolve to a website that purported offer for download a plus version of the Complainant's app with advanced features under the logo  which is similar to the Complainant's logo  affirms Respondent's intention of taking unfair advantage of the inherent confusion between the disputed domain name and the Complainant as to the origin or affiliation of the website at the disputed domain name.

The Respondent has not brought forth evidence of any rights or legitimate interests which it might have in the disputed domain name.

Based on the available record, the Panel finds the second element of the Policy has been established.

C. 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 a domain name in bad faith.


In the present case, the Complainant provided evidence which demonstrates that it has rights and is the owner of the famous and well-known registered trademark WHATSAPP, registered and used in many jurisdictions around the world long before the disputed domain was registered.

Further, the Complainant registered and is using various domain names containing the mark WHATSAPP e.g., <whatsapp.com> among others, for many years; the Complainant has also a strong Internet presence on various social media platforms.

It is therefore inconceivable for this Panel that the Respondent registered and used the disputed domain name without knowledge of the Complainant's rights, which leads to the necessary inference of bad faith. [WIPO Overview 3.0](#), section 3.2.2.

This finding is supported by the fact that the disputed domain name incorporates the Complainant's trademark WHATSAPP entirely and merely adds the letters "lus" which create the visual and phonetic impression of the term "plus".

The disputed domain name was also used in bad faith. In the present case, the Panel notes that the Respondent provided a website, addressed by the disputed domain name, which contained the Complainant's mark WHATSAPP and the logo  which is similar to the one of the Complainant  together with the purported offer for downloading a "plus" version of the Complainant's app with advanced features. By doing this, the Respondent disrupted the Complainant's business and intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark which constitutes bad faith use.

Further, the Panel notes that the Complainant's trademark WHATSAPP and logo  is famous with a high distinctiveness and is well-known globally, and the Respondent has failed to respond to the Complaint.

Based on the available record, the Panel finds that the Complainant has established the third element 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 disputed domain name <whatsappplus.co> be transferred to the Complainant.

/Peter Burgstaller/

Peter Burgstaller

Sole Panelist

Date: March 17, 2025