

ADMINISTRATIVE PANEL DECISION

ZipRecruiter, Inc. v. Tochukwu Ogbuzuo

Case No. D2025-1003

1. The Parties

The Complainant is ZipRecruiter, Inc., United States of America (“United States”), represented by SafeNames Ltd., United Kingdom.

The Respondent is Tochukwu Ogbuzuo, Nigeria.

2. The Domain Name and Registrar

The disputed domain name <ziprecruitersupport.online> is registered with Hostinger Operations, UAB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 12, 2025. On March 13, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 14, 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 (Domain Admin, Privacy Protect, LLC (PrivacyProtect.org)) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 14, 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 March 17, 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 March 19, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 8, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 9, 2025.

The Center appointed Yuri Chumak as the sole panelist in this matter on April 17, 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, ZipRecruiter, Inc., is a United States-based online employment marketplace founded in 2010. The Complainant provides recruitment-related services for individuals and businesses through its web-based and mobile platforms. According to the Complaint, the Complainant has served over one million employers and 120 million job seekers and operates a website at “www.ziprecruiter.com” that receives tens of millions of monthly visits. The Complainant is also active across various country-code domain names and social media platforms, and offers a mobile application downloaded more than five million times via Google Play.

The Complainant owns trademark rights in the term ZIPRECRUITER in multiple jurisdictions, including the United States (Reg. No. 3934310, registered March 22, 2011), the European Union, the United Kingdom, and Canada. These registrations cover a range of classes including software and employment services. The Complainant’s trademark rights predate the registration of the disputed domain name.

The disputed domain name was registered on January 26, 2025. According to the Complaint, it currently resolves to a Registrar parking page and is not used in connection with any active content.

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 name.

The Complainant asserts that the disputed domain name incorporates its ZIPRECRUITER trademark in its entirety, with the addition of the term “support”, which does not prevent a finding of confusing similarity.

The Complainant states that it has no relationship with the Respondent and has not licensed or otherwise authorized the Respondent to use its trademark. The Complainant notes that the disputed domain name is currently passively held and resolves to a parking page. However, the Complainant expresses concern that the disputed domain name has been configured with mail exchange (MX) records, which may enable deceptive email communications targeting its customers. The Complainant also references an unacknowledged cease and desist letter sent to the Respondent prior to filing the Complaint.

B. Respondent

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

6. Discussion and Findings

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 of WIPO Panel Views on Selected UDRP Questions, Third Edition, ([“WIPO Overview 3.0”](#)), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms (here, “support”) may bear on 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 name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The “.online” generic Top-Level Domain is a functional element that is disregarded for the purposes of this comparison. See [WIPO Overview 3.0](#), section 1.11.1.

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.

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. [WIPO Overview 3.0](#), section 2.1.

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 name. 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 name such as those enumerated in the Policy or otherwise.

There is no evidence that the Respondent is commonly known by the disputed domain name or that it has been authorized by the Complainant to use the ZIPRECRUITER mark. The domain name resolves to a parked page, and there is no indication that the Respondent has used or made demonstrable preparations to use the domain name in connection with a bona fide offering of goods or services. Nor is there any indication of a legitimate noncommercial or fair use.

Moreover, the composition of the disputed domain name carries a risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1.

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 this case, the disputed domain name incorporates the Complainant's distinctive ZIPRECRUITER trademark along with the term "support". The domain name resolves to a registrar parking page and has been configured to send and receive email, heightening concerns about deceptive use. No evidence of good faith use has been provided.

The Panel finds that the composition of the disputed domain name and the circumstances of its registration and passive holding support a finding of bad faith under the Policy.

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. [WIPO Overview 3.0](#), section 3.2.1.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's ZIPRECRUITER trademark, the lack of any response from the Respondent, the failure to explain the choice of disputed domain name, and the potential for abuse in light of the configured MX records. In the circumstances of this case, the Panel finds that the passive holding of the disputed domain name does not prevent a finding of bad faith.

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 <ziprecruitersupport.online> be transferred to the Complainant.

/Yuri Chumak/

Yuri Chumak

Sole Panelist

Date: April 29, 2025