

ADMINISTRATIVE PANEL DECISION

Zoox, Inc. v. Name Redacted

Case No. D2025-1098

1. The Parties

The Complainant is Zoox, Inc., United States of America (“United States”), represented by Lee & Hayes, PC, United States.

The Respondent is Name Redacted¹.

2. The Domain Names and Registrar

The disputed domain names <careers-zoox.com> and <career-zoox.com> are registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 17, 2025. On March 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On the same day, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names that differed from the named Respondent (Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 19, 2025, providing the registrant and contact information for the disputed domain names. The Complainant filed an amended Complaint on March 20, 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

¹The Respondent appears to have used the name of a third party when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted the Respondent’s name from this decision. However, the Panel has attached as Annex 1 to this decision an instruction to the Registrar regarding transfer of the Disputed Domain Name, which includes the name of the Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

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 April 3, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 23, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 27, 2025.

The Center appointed Steven Auvil as the sole panelist in this matter on May 3, 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, founded in 2014, builds autonomous, battery-electric vehicles used for its ride-hailing service, designed to reduce congestion and pollution in urban environments. Since at least 2016, the Complainant has used, advertised, and promoted goods and services under the ZOOX brand both in the United States and worldwide. Following its 2020 acquisition by Amazon, the Complainant has amassed significant media coverage worldwide.

The Complainant is the owner of several trademark registrations for the ZOOX brand including European Union Trade Mark No. 018263002 for ZOOX, registered on December 10, 2020, and Australia Registration No. 1541786 for ZOOX, registered February 20, 2013.

The Complainant owns the domain name <zoox.com> which incorporates the ZOOX mark.

The disputed domain name <careers-zoox.com> was registered on February 1, 2025, and the disputed domain name <career-zoox.com> was registered on February 17, 2025. According to the Complaint, the disputed domain names are being used to impersonate the Complainant, purporting to offer employment opportunities with the Complainant even going as far as using the names and titles of actual employees of the Complainant and including the Complainant’s ZOOX logo and address.

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 first contends that the disputed domain names are confusingly similar to the Complainant’s ZOOX mark because the disputed domain names encompass the entirety of the Complainant’s ZOOX mark, with the addition of the descriptive terms “career” and “careers” and a hyphen, which the Complainant claims are included to describe the Respondent’s fraudulent services of offering jobs with the Complainant’s company.

Next, the Complainant alleges that the Respondent has no rights or legitimate interests in the disputed domain names. The Complainant states that it did not authorize the Respondent to register the disputed domain names or any domain name incorporating the ZOOX mark or any variation of it. Additionally, there is no evidence of the Respondent using the disputed domain names or a trademark corresponding to the disputed domain names in connection with a bona fide offering of goods or services. Instead, the Complainant alleges that the Respondent has used the disputed domain names to create email addresses to send fraudulent emails impersonating the Complainant.

Finally, the Complainant contends that the disputed domain names were registered and are being used in bad faith. The Complainant alleges that the Respondent registered and has used the disputed domain names to intentionally attempt to attract, for commercial gain, Internet users to the Respondent's website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website. The Complainant further contends that the disputed domain names are being used by the Respondent to impersonate the Complainant in an email fraud scheme to falsely offer consumers jobs purportedly with the Complainant to obtain personal information.

The Complainant requests that the disputed domain names be transferred to the Complainant.

B. Respondent

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

6. Discussion and Findings

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 directs that the Complainant must prove each of the following to obtain relief:

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

In view of the Respondent's failure to submit a Response, the Panel is entitled to accept as true the allegations set forth in the Complaint (unless the evidence is clearly contradictory), and to derive reasonable inferences from the evidence presented. See *Talk City, Inc. v. Michael Robertson*, WIPO Case No. [D2000-0009](#).

Based on the foregoing guidance, the Panel makes the following findings and conclusions based on the allegations and evidence contained in the Complaint, as amended, and reasonable inferences drawn from the evidence presented.

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. Where the relevant trademark is recognizable within the disputed domain name, the addition of other terms, whether descriptive or otherwise, will not prevent a finding of confusing similarity under the first element. [WIPO Overview 3.0](#), section 1.8. Additionally, as set forth in section 1.11.1 of the [WIPO Overview 3.0](#), the applicable generic Top-Level Domain ("gTLD") (e.g., ".com", ".site", ".info", ".shop") is viewed as a standard registration requirement and as such is typically disregarded under the first element's confusing similarity test. As such, the use of ".com" gTLD in the disputed domain names have no bearing on the confusing similarity analysis.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy as the Complainant owns at least one trademark for ZOOX. [WIPO Overview 3.0](#), section 1.2.1. Moreover, the disputed domain names consist of the entirety of the Complainant's ZOOX mark with the addition of the generic terms "career" and "careers" separated by a hyphen. The Panel finds the addition of such terms

does not obviate confusing similarity between the disputed domain names and the ZOOX mark. See *Milliman, Inc. v. Caleb Milne*, WIPO Case No. [D2024-3054](#).

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. Such circumstances include:

(i) before any notice of the dispute, the respondent used, or prepared to use, the disputed domain name or a name corresponding to the disputed domain name in connection with a bona fide offering of goods or services;

(ii) the respondent (as an individual, business, or other organization) is commonly known by the disputed domain name, even if the respondent has acquired no trademark or service mark rights; or

(iii) the 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.

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 the production of information that is often primarily within the knowledge or control of the respondent. Considering this difficulty, 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 names. Nothing in the record suggests that Respondent has rights or legitimate interests in respect of the disputed domain names. Indeed, there is no evidence that any of the circumstances listed in paragraph 4(c) of the Policy apply. Moreover, the Respondent has not come forward with relevant evidence to rebut the Complainant’s prima facie showing of the absence of rights or legitimate interests in respect of the dispute domain names.

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.

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.

In the present case, the Panel concludes that Respondent registered and used the disputed domain names in bad faith.

First, the Respondent copied the Complainant’s well-known ZOOX mark and included it in the disputed domain names, resulting in confusing similarity and a risk of implied affiliation. This alone reflects registration in bad faith.

Second, the evidence shows that Respondent used the disputed domain names in bad faith as part of a phishing scheme to fraudulently obtain personal information. More specifically, the disputed domain names are being used by Respondent to impersonate the Complainant and deceive job seekers using Complainant's ZOOX mark, address, employee names. Previous panels have held that the use of a domain name for such illegal activity constitutes use of a domain name in bad faith (see [WIPO Overview 3.0](#), section 3.4) and so does this Panel.

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 names <careers-zoox.com> and <career-zoox.com> be transferred to the Complainant.

/Steven Auvil/

Steven Auvil

Sole Panelist

Date: May 17, 2025