

ADMINISTRATIVE PANEL DECISION

Khalsa Aid International v. Gurjit Dhillon

Case No. D2025-2813

1. The Parties

The Complainant is Khalsa Aid International, United Kingdom (“UK”), internally represented.

The Respondent is Gurjit Dhillon, UK.

2. The Domain Name and Registrar

The disputed domain name <khalsaaid.com> is registered with Sav.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 16, 2025. On July 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same day, 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 (Unknown / Privacy Service (Sav.com, LLC)) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 18, 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 the same day.

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 July 21, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 10, 2025. The Respondent sent email communications to the Center on July 20 and August 10, 2025. The Complainant sent an unsolicited supplemental submission to the Center on August 11, 2025.

The Center appointed Steven A. Maier as the sole panelist in this matter on August 14, 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. On August 27, 2025, the Panel issued Procedural Order No. 1, inviting the Respondent to submit its comments to the Complainant's Supplemental Filing, by September 1, 2025. On September 1, 2025, the Respondent submitted its comments on the Complainant's Supplemental Filing.

4. Complainant's Unsolicited Supplemental Submission and Procedural Order No. 1

As observed in section 4.6 of WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"):

"Unsolicited supplemental filings are generally discouraged, unless specifically requested by the panel.

On receipt of a request to submit an unsolicited supplemental filing or the actual receipt of such filing, the WIPO Center will confirm receipt of the request or filing to the parties, and forward such request or filing to the panel for its consideration as to admissibility.

In all such cases, panels have repeatedly affirmed that the party submitting or requesting to submit an unsolicited supplemental filing should clearly show its relevance to the case and why it was unable to provide the information contained therein in its complaint or response (e.g., owing to some "exceptional" circumstance)."

The content of the Complaint in this proceeding was minimal, including no information on such key issues as whether the Complainant claimed to have made any use of the name and trademark KHALSA AID prior to the date of registration of the disputed domain name. In these circumstances, noting that the Complainant was not legally represented, the Panel determines that the Complainant's unsolicited supplemental submission should be admitted, notwithstanding the fact that its contents could and should have been included in the original Complaint.

To ensure that the Parties were treated with equality and were each given a fair opportunity to present their case pursuant to paragraph 10(b) of the Rules, the Panel issued Procedural Order No. 1, inviting the Respondent to comment on the Complainant's supplemental submission. The Respondent filed a reply on September 1, 2025.

5. Factual Background

The Complainant is a UK registered charity, originally registered under the name "Khalsa Aid" on April 18, 2000, under Charity Number 1080374. That original registration appears to have been replaced by a new registration in the name of "Khalsa Aid International" on August 25, 2015, under Charity Number 1163294.

The Complainant is a UK-based humanitarian relief charity, providing support around the world to victims of natural and man-made disasters such as floods, earthquakes, famine and war.

The Complainant is the owner of various registrations for the trademark KHALSA AID, the earliest of which is UK trademark registration number 00003599066 for the word mark KHALSA AID, registered on December 3, 2021, in International Classes 36 and 45.

The Complainant operates a website at "www.khalsaaid.org". The Complainant's content is traceable on that website, via "www.web.archive.org", back to at least September 22, 2002. ¹

The disputed domain name was registered on September 27, 2011.

¹ As discussed in section 4.8 of the [WIPO Overview 3.0](#), a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision.

The Complainant exhibits evidence that, as of July 15, 2025, the disputed domain name resolved to a webpage stating “Khalsaaid.com – This Domain is for Sale!” and offering a “Buy Now” price of USD 5,000.

6. Parties’ Contentions

A. Complainant

The Complainant submits that it has operated as a charitable institution, under the name KHALSA AID, since 1999. It states that the name KHALSA AID has been in continuous and extensive public use since that time, and that the Complainant had therefore obtained common law rights in that trademark well before the Respondent’s registration of the disputed domain name.

The Complainant contends that the name KHALSA AID uniquely identifies the Complainant, and that the disputed domain name, whether or not comprised of two “dictionary” terms, clearly targets the Complainant’s trademark. It submits that the Respondent’s webpage cannot establish rights or legitimate interests in the disputed domain name in circumstances where the disputed domain name is identical to the Complainant’s trademark.

The Complainant submits that its mark KHALSA AID was publicly operated for many years prior to the Respondent’s registration of the disputed domain name, and that the disputed domain name gives rise to an obvious risk of donor and user confusion with the Complainant’s trademark and its website at “www.khalsaaid.org”.

The Complainant requests the transfer of the disputed domain name.

B. Respondent

The Respondent submits that they registered the disputed domain name many years before the registration of the Complainant’s UK trademark.

The Respondent contends that the words “Khalsa” and “aid” are terms in common usage and are not the property of any individual or organization. The Respondent states that, in conjunction with their own background, they own other domain names including the terms “khalsa” and “sikh” (further details are not provided).

The Respondent states that none of their domain names are for sale, and that the disputed domain name should have resolved to a standard landing page and not to a page offering the disputed domain name for sale.

In their reply to the Complainant’s supplemental filing, the Respondent highlights various changes over the years in the Complainant’s registration details. The Respondent states that they do not object to the transfer of the disputed domain name to the Complainant, provided that this is directed to the correct registered charitable entity.

7. Discussion and Findings

In order to succeed in the Complaint, the Complainant is required to show that all three of the elements set out under paragraph 4(a) of the Policy are present. Those elements are that:

(i) the disputed domain name is 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 respect of 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 has established that it is the owner of registered trademark rights in the mark KHALSA AID. The disputed domain name is identical to that trademark, and it is immaterial for the purposes of the first element under the Policy (although potentially relevant to the second and third elements) that the Complainant's trademark was registered after the date of registration of the disputed domain name.

That observation notwithstanding, the Panel also accepts the Complainant's submissions (which the Respondent does not dispute) that it had obtained common law trademark rights in the mark KHALSA AID, prior to the Respondent's registration of the disputed domain name, by virtue of its extensive public use of that mark in connection with its charitable purposes.

The Panel therefore finds that the disputed domain name is identical to a trademark in which the Complainant has rights.

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.

The Respondent claims to have rights or legitimate interests in respect of the disputed domain name because it comprises two dictionary words. However, in order to establish rights or legitimate interests in respect of a domain name of that nature, a respondent's arguments that the purpose of registration is connected with the dictionary words in question may not be sufficient, and the panel may need to consider whether the registration was for the purposes of targeting third-party trademark rights or not.

Here the Respondent offers no specific explanation for its choice of combining these two terms in the disputed domain name, nor does it offer any suggestion of how a purchaser of the disputed domain name, other than the Complainant, could make any bona fide use of it. Indeed, in view of the fact that the disputed domain name is identical to the Complainant's trademark KHALSA AID, and closely resembles its active domain name <khalsaaid.org>, the Panel infers that the disputed domain name more likely than not have been registered for the purpose of targeting the Complainant's trademark rights.

The Panel therefore finds that the Respondent has no rights or legitimate interests in respect of the disputed domain name.

C. Registered and Used in Bad Faith

The Panel finds the Complainant's KHALSA AID trademark (whether or not comprised of two dictionary terms) to be distinctive of the Complainant and its charitable activities. The Respondent has offered no plausible explanation for its registration of the disputed domain name, which is identical to the Complainant's KHALSA AID trademark and closely resembles its active domain name <khalsaaid.org>. The Panel infers in the circumstances that the Respondent was aware of the Complainant's KHALSA AID trademark when it registered the disputed domain name, and that it did so with the intention of taking unfair commercial advantage of the Complainant's rights in that trademark.

As to the Respondent's use of the disputed domain name, the Panel accepts the Complainant's evidence that the disputed domain name has been offered for sale at the price of USD 5,000. For the reasons set out

above, the Panel finds that the disputed domain name is intrinsically connected to the Complainant, and the composition of the disputed domain name creates a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the website. The Panel therefore finds, on the balance of probabilities, that the Respondent registered the disputed domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the Complainant for valuable consideration in excess of the Respondent's documented out-of-pocket costs directly related to the domain name (paragraph 4(b)(i) of the Policy).

The Panel therefore finds that the disputed domain name has been registered and is being used in bad faith.

8. 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 <khalsaaid.com> be transferred to the Complainant.

/Steven A. Maier/

Steven A. Maier

Sole Panelist

Date: September 5, 2025