

## **ADMINISTRATIVE PANEL DECISION**

ZipRecruiter, Inc. v. Zip Recruiter, Zip Recruiter  
Case No. D2025-2837

### **1. The Parties**

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

The Respondent is Zip Recruiter, Zip Recruiter, United Kingdom.

### **2. The Domain Name and Registrar**

The disputed domain name <ziprecruitercandidates.com> is registered with Squarespace Domains II LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 17, 2025. On July 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 18, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

The Center sent an email communication to the Complainant on July 21, 2025, providing the registrant and contact information disclosed by the Registrar. The Complainant in an email communication from the same date requested the possibility to file an Amended Complaint. The request was granted and the Complainant filed an amended Complaint on July 22, 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 July 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 12, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 13, 2025.

The Center appointed Lorenz Ehrler as the sole panelist in this matter on August 18, 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**

ZipRecruiter, Inc. is an American online recruitment company which offers recruitment services to companies and employees via websites and mobile applications. The Complainant has its headquarters in the United States, but has also an office in the United Kingdom – where the Respondent seems to be based – and where it offers its services through the website “www.ziprecruiter.co.uk”.

The Complainant owns several trademarks, in particular:

- the United States word trademark ZIPRECRUITER, registration no. 3934310, registered on March 22, 2011;
- the EU word trademark ZIPRECRUITER, registration no. 015070873, registered on June 13, 2016;
- the United Kingdom word trademark ZIPRECRUITER, registration number UK00915070873, registered on June 13, 2016.

All of these trademarks claim services in class 42, and most of them also claim services in classes 9, 36 and 41. Since 2010, the Complainant holds the domain name <ziprecruiter.com>, which resolves to its main official website.

The disputed domain name was registered on June 11, 2025 and is thus clearly posterior to the Complainant's trademarks. As the Respondent registered the disputed domain name under the name Zip Recruiter, it is worth mentioning that no company name Zip Recruiter is registered in the United Kingdom, other than the Complainant's.

The disputed domain name is inactive and merely resolves to a parked webpage indicating that the website is “under construction”. However, the disputed domain name appears to have been used as an e-mail address in relation to messages sent to third parties in the name of an employee of the Complainant.

#### **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.

Notably, the Complainant contends that the disputed domain name, <ziprecruitercandidates.com>, is confusingly similar to its ZIPRECRUITER trademarks.

Furthermore, the Complainant states that the Respondent is not affiliated with its group and that no license has been granted to the Respondent to use the Complainant's trademarks. Also, the Respondent does not use the disputed domain name otherwise than for fraudulent purposes which can obviously not represent any fair use.

Lastly, the Complainant contends that the Respondent registered and uses the disputed domain name in bad faith, even though it does not resolve to any active website, in particular because the Respondent knew or should have known of the Complainant's trademark, which is proven by the fact that it used the disputed domain name to set up an email address for a fraudulent scheme, impersonating an employee of the Complainant.

## **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 registered by the Respondent 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**

The trademarks put forward by the Complainant demonstrate that the Complainant has rights in ZIPRECRUITER.

Under the UDRP, the requirement under paragraph 4(a) of the Policy requires the disputed domain name to be identical or confusingly similar to the Complainant's trademarks. There is no requirement of similarity of goods and/or services.

The existence of confusing similarity within the meaning of paragraph 4(a) of the Policy is not in doubt in the present case, given that the main element in the disputed domain names, i.e. "ziprecruiter", is identical with the Complainant's distinctive trademark ZIPRECRUITER. The incorporation of a trademark in its entirety is typically sufficient to establish that a disputed domain name is identical or confusingly similar to a trademark. The other element of the disputed domain name, i.e. the element "candidates" is a descriptive word and not sufficient to avoid confusing similarity.

As far as the generic Top Level Domain ("gTLD") ".com" is concerned, this element has a technical function and therefore is typically not taken into account when assessing the issue of identity or confusing similarity.

The Panel thus finds that the disputed domain name is confusingly similar with the Complainant's trademark ZIPRECRUITER. The first element of the Policy has been established.

### **B. Rights or Legitimate Interests**

The Complainant contends that the Respondent does not have any rights or legitimate interests in the disputed domain name, in particular that the Respondent has not at any time been commonly known by the disputed domain name and that the Respondent is not making legitimate use of said disputed domain name. The Complainant clearly states that it has not granted the Respondent any rights to use its trademarks.

By not submitting any response to the Complaint, the Respondent failed to invoke any circumstance that might demonstrate, pursuant to paragraph 4(c) of the Policy, that it holds any rights or legitimate interests in the disputed domain names (*Ahead Software AG v. Leduc Jean*, WIPO Case No. [D2004-0323](#); see also, *Nintendo of America, Inc., v. Tasc, Inc. and Ken Lewis*, WIPO Case No. D2000-1563 (finding that respondent's default was sufficient to conclude that it had no rights or legitimate interests in the disputed domain names)).

Furthermore, the Complainant rightly points out that the Respondent impersonating an employee of the Complainant is all the contrary of a bona fide use (*Ingenico Group v. Sammi Wilhi, Lng Group Pty Ltd*, WIPO Case No. [D2019-1079](#)). Where the respondent demonstrably uses the domain name in bad faith, it is obvious that it does not have any rights or legitimate interests in the disputed domain name.

Accordingly, the Panel finds that the Complainant has shown that the Respondent does not have any rights or legitimate interests in the disputed domain name. The second element of the Policy has been established.

### **C. Registered and Used in Bad Faith**

Paragraph 4(a)(iii) of the Policy provides that the Complainant must, in addition to the matters set out above, demonstrate that the disputed domain name has been registered and is being used in bad faith.

The undisputed prima facie evidence establishes that the Respondent is not affiliated with the Complainant and has no license or other authorisation to use the Complainant's trademark.

The Respondent registered the disputed domain name well after the Complainant's trademark was in use. The Panel finds that the Respondent should have known about the Complainant's trademark and business when registering the disputed domain name. This Panel considers that the disputed domain name for itself is a strong indication that the Respondent was aware of the Complainant's trademark ZIPRECRUITER, as it seems more than unlikely that the Respondent would have created – randomly – the disputed domain names that is almost identical with the Complainant's distinctive trademark (*cf. Motul v. Contact Privacy Inc. Customer 0138693539 / Konstantin Speranskii*, WIPO Case No. [D2016-2632](#)). This conclusion imposes itself even more when considering that the disputed domain combines the Complainant's trademark with the word "candidates", which is a reference to the Complainant's business.

Any remaining doubt in this respect can be excluded when considering that the Respondent, shortly after the registration of the disputed domain name <ziprecruitercandidates.com>, impersonated an employee of the Complainant. This shows indeed that the Respondent registered the disputed domain name in view of a fraudulent scheme, which implies that it was well aware of the Complainant's company and trademark.

Previous UDRP panels have recognized that one of the ways in which domain names may be used is in connection with fraud schemes, whereby it is irrelevant whether the domain name in dispute resolves to a website or not. The Panel considers that a likely fraudulent intention was in place involving an email address linked to this disputed domain name. Therefore, the Panel concludes that the use of the disputed domain name was in bad faith.

This Panel therefore holds the view that the disputed domain name was registered and used in bad faith.

The Complainant therefore has established registration and use of the disputed domain name in bad faith.

### **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 <ziprecruitercandidates.com> be transferred to the Complainant.

/Lorenz Ehrler/

**Lorenz Ehrler**

Sole Panelist

Date: August 26, 2025