

ADMINISTRATIVE PANEL DECISION

AirGSM Pte Ltd. v. Quan Zhongjun, Juanita Co.
Case No. D2025-2868

1. The Parties

The Complainant is AirGSM Pte Ltd., Singapore, represented by Lewis Silkin LLP, United Kingdom.

The Respondent is Quan Zhongjun, Juanita Co., China.

2. The Domain Names and Registrar

The disputed domain names <airalo.com>, <airalo.com>, <airaalo.com>, <airaloo.com> and <airralo.com> are registered with Cosmotown, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 18, 2025 in relation to the disputed domain names <airaloo.com>, <airalo.com>, and <airaalo.com>. On July 21, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with these disputed domain names. On July 22, 2025, the Complainant filed the first amended Complaint adding the disputed domain names <airralo.com> and <airalo.com>. On July 23, 2025, and July 26, 2025, the Registrar transmitted by email to the Center its verification responses, disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted / Private Whois) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 28, 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 the second amended Complaint on August 4, 2025.

The Center verified that the Complaint together with the amended Complaints 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 August 8, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 28, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 1, 2025.

The Center appointed William A. Van Caenegem as the sole panelist in this matter on September 4, 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 global provider of digital SIM cards. The Complainant employs over 200 people in over 44 countries. It is the registered owner of the trademark AIRALO and device (“the Airalo Logo”), including Singapore Trade Mark Registration No. 40201914330P, filed on July 3, 2019 and registered on December 19, 2019, in relation to Class 9: Software and applications for mobile devices; Class 35: Online retail services; and Class 38: Telecommunications. It is also the owner of International Trade Mark Registration No. 1701049 for the Airalo Logo, registered on August 18, 2022, with protection extended to inter alia Australia, Brazil, Canada, Japan, Indonesia, United States of America, and Viet Nam, for the same goods and services as the Singaporean registration.

The Complainant’s main website is at “www.airalo.com”.

The disputed domain names are <airaloo.com>, registered on December 25, 2024; <aiiralo.com>, registered on January 10, 2025; <airaalo.com> registered on January 10, 2025; <airralo.com>, registered on January 10, 2025; and <aairalo.com>, registered on January 10, 2025.

The Complainant has filed evidence showing that at some point in time they resolved to websites that mimicked the Complainant’s website.

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.

The Complainant provides digital SIM (eSIM) cards to customers in over 200 countries and says that it has enjoyed astronomical growth in a short space of time and has a global reputation under its AIRALO trade mark.

The Complainant contends that the disputed domain names are all highly similar to the Complainant’s AIRALO trade mark, as they represent intentional misspellings of that mark. The Complainant points out that each of the disputed domain names either reproduces the AIRALO trade mark in its entirety or incorporates it to a significant degree, with the only difference being the addition of an extra letter—specifically, “o”, “i”, “r”, or “a” — resulting in the variations “airaloo”, “aiiralo”, “airaalo”, “airralo”, and “aairalo”. It is evident, according to the Complainant, that the Respondent has deliberately inserted these additional letters to exploit typographical errors made by Internet users who may inadvertently press the “o”, “i”, “r”, or “a” key more than once when attempting to type the Complainant’s trade mark. The Complainant says that this constitutes a classic example of typo squatting. The Complainant concludes that the disputed domain names are confusingly similar to the Complainant’s AIRALO trade mark.

The Complainant says that to the best of its knowledge, the Respondent does not own any registered rights in a trade mark for “Airalo” and points out that the latter is a coined term, without inherent meaning or descriptive connotations. The Complainant has not given consent for the Respondent to register domain names that incorporate its distinctive AIRALO trade mark.

Archived screenshots that the Complainant appends to the Complaint show that the disputed domain names pointed to a website that mimicked the Complainant's official website, demonstrating that the Respondent was aware of the Complainant's business. However, all those websites were inactive at the time of filing, the Complainant says. The Complainant submits that the mimicking of the Complainant's website is clearly an attempt to mislead Internet users into believing that it owns the disputed domain names. Such use cannot, the Complainant contends, constitute a legitimate interest or bona fide, noncommercial use.

The disputed domain names were inactive at the time the Complaint was filed, but the Complainant maintains that the absence of any active websites does not prevent a finding of bad faith under the doctrine of passive holding. The Complainant adds that, as demonstrated by the popularity of the Complainant's website and mobile applications, the Complainant enjoyed substantial success before the Respondent chose to register the disputed domain names. The Complainant adds that the composition of the disputed domain names implies that the Respondent plans to use them in respect of a business or service named "Airalo". Given that the Complainant is the owner of a very successful business under the AIRALO trade mark, it is implausible, the Complainant contends, that the Respondent did not have the Complainant's rights in mind when registering the disputed domain names.

According to the Complainant, the overwhelming likelihood is that the Respondent registered the disputed domain names to make money from them. Its previous use of the disputed domain names entailed it posing as the Complainant with a view to deceiving Internet users for illicit gain. In future, however, the way in which it will do so is not clear, the Complainant says, but the fact is that no legitimate use is in fact possible demonstrates bad faith.

A reverse Whois search conducted by the Complainant against the Respondent's email address reveals, according to the Complainant, that the Respondent is a serial domain name squatter, showing that they have registered an array of domain names containing minor misspellings of other third party brands. According to the Complainant, this clearly further demonstrates the Respondent's bad faith in targeting various brand owners' reputations as vested in their relevant trade marks in a manner that constitutes bad faith pursuant to the Policy. Finally, the Complainant submits that several previous UDRP decisions concerning the Respondent all resulted in a full transfer of the domain names in those proceedings.

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 (the Airalo Logo) for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the textual element of the mark is recognizable within the disputed domain names. The very slight misspellings mean that none of the disputed domain names are identical to the term "Airalo" but they are certainly confusingly similar to the Complainant's mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. The minor misspellings do not prevent a finding of confusing similarity.

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.

The Complainant has not authorized the Respondent to use its Airalo Logo, nor is there any evidence that the Respondent had preexisting rights in such a logo, or in the term “airalo”, either by registration or otherwise.

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

Panels have held that the use of a domain name for illegitimate activity here, impersonation by mimicking the Complainant’s official website, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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 the present case, the Panel notes that the Respondent has registered multiple domain names that constitute typosquatted variations of the Complainant’s registered AIRALO trademark and the textual element of the Airalo Logo. The are highly unlikely to have all been selected coincidentally. At the time of registration of all the disputed domain names, the Airalo Logo had been in widespread and prominent use in many jurisdictions, and it concerns a service delivered via the Internet. This makes it highly unlikely that the Respondent was not aware of the Complainant who conducts business under its trademark AIRALO and makes extensive use of the Airalo Logo. The Complainant’s rights are in any case easily ascertainable by way of a general Internet search or a trademark search.

The use of a disputed domain name to resolve to a website that mimics that of the Complainant whose distinctive trademark is adopted in the domain name, is clearly in bad faith. At one point this is what the Respondent did with the disputed domain names.

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 <aaialo.com>, <aiialo.com>, <airaalo.com>, <airaloo.com>, and <airralo.com> be transferred to the Complainant.

/William A. Van Caenegem/

William A. Van Caenegem

Sole Panelist

Date: September 18, 2025.