

ADMINISTRATIVE PANEL DECISION

Travelscape, LLC v. BIN ZAHIR MUHAMMAD ZAIDI
Case No. D2025-3375

1. The Parties

The Complainant is Travelscape, LLC, United States of America, represented by Kilpatrick Townsend & Stockton LLP, United States of America ("United States").

The Respondent is BIN ZAHIR MUHAMMAD ZAIDI, Malaysia.

2. The Domain Name and Registrar

The disputed domain name <travelo-city.com> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 21, 2025. On August 22, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 25, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 26, 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 August 28, 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 August 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 18, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 19, 2025.

The Center appointed Luca Barbero as the sole panelist in this matter on September 25, 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

Founded in 1996 and acquired by Expedia in 2015, the Complainant provides consumer-direct travel services for leisure and business travelers through the website “www.travelocity.com”.

The Complainant is the owner of several trademark registrations for TRAVELOCITY, including the following, as per trademark registration certificates submitted as annexes K and L to the Complaint:

- United States trademark registration No. 2254700 for TRAVELOCITY (word mark), filed on January 28, 1997, and registered on June 22, 1999, in international classes 35, 39 and 42;
- United States trademark registration No. 2466132 for TRAVELOCITY (word mark), filed on September 29, 1998, and registered on July 3, 2001, in international classes 35, 38, 39 and 42;
- European Union trademark registration No. 000163642 for TRAVELOCITY (word mark), filed on April 1, 1996, and registered on September 14, 2001 in classes 9 and 39;
- China Hong Kong trademark registration No. 2002B15646AA for TRAVELOCITY (word mark), filed on June 14, 2000, and registered on December 6, 2002, in classes 39 and 42;
- China trademark registration No. 1495415 for TRAVELOCITY (word mark), filed on October 10, 1999, and registered on December 21, 2000, in class 39.

The Complainant is also the owner of the domain name <travelocity.com>, which was registered on January 23, 1997, and is used by the Complainant to provide its services under the trademark TRAVELOCITY.

The disputed domain name <travelo-city.com> was registered by the Respondent on April 7, 2025, and is pointed to a website displaying the TRAVELOCITY mark and a login form and expressly referring to the Complainant under the “Privacy Policy” section, where it is stated that data provided through the website are collected and used by “Travelocity, part of the Expedia Group”.

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 is identical or at least confusingly similar to the trademark TRAVELOCITY in which the Complainant has rights as it reproduces the trademark in its entirety with the mere addition of a hyphen between the words “travelo” and “city” and the generic Top-Level Domain (“gTLD”) “.com”.

The Complainant states that the Respondent does not have any rights or legitimate interests in respect of the disputed domain name since: i) the Complainant’s marks long predate the date of registration of the disputed domain name; ii) the Respondent is not commonly known by the disputed domain name; iii) the Respondent is in no way licensed or permitted by the Complainant to register or use any domain name incorporating the TRAVELOCITY mark or to use the Complainant’s TRAVELOCITY mark in its activity;

iv) the Respondent is not using, and has not used, the disputed domain name in connection with any bona fide offering of goods or services, nor has it made any legitimate noncommercial or fair use of the disputed domain name, as it has used the disputed domain name to impersonate the Complainant in an apparent scheme to phish for user's sensitive information like login credentials.

The Complainant submits that the Respondent registered the disputed domain name in bad faith because the disputed domain name incorporates the Complainant's TRAVELOCITY in its entirety, was registered long after the Complainant's rights in its TRAVELOCITY mark were established and after the Complainant's services became well-known throughout the world. The Complainant further states that the Respondent registered the disputed domain name for the purpose of trading on the goodwill and reputation built by the Complainant in its TRAVELOCITY mark.

The Complainant also contends that the Respondent registered the disputed domain name to deceive users into believing the corresponding website is somewhat associated or endorsed by the Complainant, which it is not, and points out that the Respondent used the disputed domain name to impersonate the Complainant, using an apparent phishing scheme in which users are tricked into entering personal login credentials.

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:

- (i) that 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) 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.

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. Indeed, the Complainant has provided evidence of valid trademark registrations for TRAVELOCITY.

The Complainant's mark is entirely reproduced in the disputed domain name with the mere addition of a hyphen between the terms "travelo" and "city". Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

In addition, the gTLD ".com" can be disregarded under the first element confusing similarity test, being a standard registration requirement. [WIPO Overview 3.0](#), section 1.11.1

Therefore, 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.

According to the records, there is no relationship between the Complainant and the Respondent, and the Complainant has not authorized the Respondent to register or use its trademark or the disputed domain name. Moreover, there is no element from which the Panel could infer that the Respondent has rights over the disputed domain name, or that the Respondent might be commonly known by the disputed domain name.

Furthermore, there is no evidence showing that the Respondent might have used or made preparations to use the disputed domain name in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use without the intention to misleadingly divert the consumers or to tarnish the Complainant’s trademark.

According to the records, the Respondent has pointed the disputed domain name to a website displaying without authorization the Complainant’s mark and a login form requiring users to enter their personal login credentials. Moreover, the “Privacy Policy” of the website mentions “Travelocity, part of the Expedia Group” as the entity responsible for collecting and processing users’ personal data. Therefore, it appears that the Respondent used the disputed domain name for impersonation and phishing purposes. Panels have held that the use of a domain name for illegal activity such as phishing, impersonation/passing off, or other types of fraud, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

Therefore, the Panel finds the second element of the Policy has also 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 finds that, in light of the prior registration and use of the trademark TRAVELOCITY in connection with the Complainant’s travel and booking services, provided online via the website “www.travelocity.com”, the Respondent knew or should have known of the Complainant’s trademark at the time of registration of the disputed domain name. [WIPO Overview 3.0](#), section 3.2.2.

Moreover, in view of the use of the disputed domain name to divert users to the website described above, publishing a login form in association to the TRAVELOCITY mark, without displaying any disclaimer of

non-affiliation with the Complainant on the homepage and, on the contrary, making explicit reference to the Complainant in the “Privacy Policy” page, the Panel finds that the Respondent intentionally attempted to attract Internet users to its website, in all likelihood for commercial gain, by creating confusion with the trademark TRAVELOCITY as to the source, sponsorship, affiliation or endorsement of its website according to paragraph 4(b)(iv) of the Policy.

Furthermore, as highlighted above, the disputed domain name appears to have been used to impersonate the Complainant in order to obtain users’ credentials to access the Complainant’s website. Panels have held that the use of a domain name for illegal activity such as phishing, impersonation/ passing off, or other types of fraud, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain name constitute bad faith under the Policy.

Therefore, the Panel finds that the Complainant has established the third element of the Policy as well.

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 <travelo-city.com> be transferred to the Complainant.

/Luca Barbero/

Luca Barbero

Sole Panelist

Date: October 9, 2025