

ADMINISTRATIVE PANEL DECISION

ZipRecruiter, Inc. v. Zhichao
Case No. D2025-3387

1. The Parties

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

The Respondent is Zhichao, China.

2. The Domain Names and Registrar

The disputed domain names <ziprecruiger.com>, <ziprecruitdr.com>, <ziprecruitef.com> and <ziprecrukter.com> are registered with Dynadot Inc (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 22, 2025. On August 22, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On August 25, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted For Privacy / Super Privacy Service LTD c/o Dynadot) 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 29, 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 September 1, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 21, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 23, 2025.

The Center appointed Gustavo Patricio Giay as the sole panelist in this matter on September 30, 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 well-known American online recruitment company that provides employment services for both individuals and businesses worldwide. Founded in 2010, the Complainant has served over one million employers and 120 million job seekers, attracting more than seven million active job seekers and 10,000 new companies each month. Its platform has over 40 million job alert subscribers.

Recognized as one of North America's fastest-growing technology companies, the Complainant was ranked 350 in Deloitte's 2019 Technology Fast 500 and included in Fast Company's 2019 list of "The World's Most Innovative Companies" in the Enterprise sector. It has also received several G2 Awards and frequent recognition among the best online recruitment services.

Headquartered in the United States, the Complainant has expanded its operations globally, including a strong presence in the UK through its London office. It partners with major UK institutions such as GCHQ, the Metropolitan Police, and the Ministry of Justice, and operates its UK website at <ziprecruiter.co.uk>, which received an average of 146,700 visits between April and June 2025.

The Complainant's primary platform, at the domain name <ziprecruiter.com>, serves as the core of its business. It enables employers to post and manage job listings and allows candidates to create profiles, apply for jobs, and receive tailored alerts. Between April and June 2025, the Complainant's website averaged over 30 million visits per month.

The Complainant is the owner of trademark ZIPRECRUITER in many jurisdictions including, United States Patent and Trademark Office (USPTO) Reg. No. 3934310, for class 42, registered since March 22, 2011; European Union Intellectual Property (EUIPO) Reg. No. 015070873, for classes 9, 36, 41, and 42, registered since June 13, 2016; United Kingdom Intellectual Property Office (UKIPO) Reg. No. 00915070873, for classes 9, 36, 41, and 42, registered since June 13, 2016; and Canadian Intellectual Property Office Reg. No. 979480, for classes 9, 41, and 42, registered since August 28, 2017. The Complainant is also the owner of trademark ZIPRECRUITER.CO.UK, UKIPO Reg. No. 00915644041, for classes 9, 36, 41, and 42, registered since November 4, 2016; and trademark ZIPRECRUITER.COM, UKIPO Reg. No. 00915070881, for classes 9, 36, 41, and 42, registered since June 13, 2016.

The Complainant also owns an important domain names portfolio, including, among others, its primary website at the domain name <ziprecruiter.com>, registered since February 2010.

As demonstrated by the Complainant in Annex 18, the Complainant tried to solve this matter amicably by sending a cease-and-desist letter to the Respondent on July 10 and 17, 2025, but did not receive a response.

The disputed domain names were registered on and are presently used as follows:

Disputed domain name	Registration date	Use
<ziprecruiger.com>	July 6, 2025	Redirect to a website under the domain name <socialsearch.com>, which hosts an incomplete and non-functional webpage.
<ziprecruitdr.com>	July 6, 2025	Inactive website
<ziprecruitef.com>	July 4, 2025	Redirect to a website under the domain name <socialsearch.com>, which hosts an incomplete and non-functional webpage

<ziprecrukter.com>	July 6, 2025	Redirect to a website under the domain name <socialsearch.com>, which hosts an incomplete and non-functional webpage
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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 states that the disputed domain names are confusingly similar to its trademark ZIP RECRUITER, and to its official domain names.

The Complainant further contends that the Respondent has no rights or legitimate interests in respect of the disputed domain names, nor is it related in any way to the Complainant. Neither license nor authorization has been granted to the Respondent to make any use of the Complainant's ZIP RECRUITER trademark or apply for registration of the disputed domain names.

More specifically, the Complainant alleges that the Respondent has not used and/or have no demonstrable intention to use the disputed domain names except to create a likelihood of confusion with the Complainant's trademark. In fact, the Complainant claims that the Respondent has selected the disputed domain names only to intentionally lead Internet users to believe they are accessing the Complainant's website.

Finally, the Complainant has requested the Panel to issue a decision ordering the transfer of the disputed domain names to 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, for this Complaint to succeed in relation to the disputed domain names, the Complainant must prove each of the following, namely that:

- (i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interest in respect of the disputed domain names; and
- (iii) the disputed domain names were registered and are 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.

The Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. The typosquatting practice of replacing the letter “t” with the letter “g” in <ziprecruiger.com>, replacing the letter “e” with the letter “d” in <ziprecruitdr.com>, replacing the letter “r” with the letter “f” in <ziprecruitf.com> and replacing the letter “i” with the letter “k” in <ziprecrukter.com>, does not prevent the Panel from finding that the disputed domain names are confusingly similar to the Complainant’s trademark, in line with section 1.9 of the [WIPO Overview 3.0](#).

Moreover, the “.com” generic Top-Level Domain (“gTLD”) is viewed as a standard registration requirement and is generally disregarded under the first element of the confusing similarity test, as set forth in section 1.11.1 of [WIPO Overview 3.0](#).

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 claimed not to have authorized, licensed, or permitted the Respondent to register or use the disputed domain names or to use the trademark ZIPRECRUITER, nor is there any other evidence in the file suggesting that the Respondent has or could have rights or legitimate interests in the disputed domain names. Also, the Complainant has prior rights in the ZIPRECRUITER trademark which clearly precede the Respondent’s registration of the disputed domain names.

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.

Likewise, it does not seem that the Respondent is making any legitimate noncommercial or fair use of the disputed domain names. On the contrary, the disputed domain names <ziprecruiger.com>, <ziprecruitf.com> and <ziprecrukter.com> redirect to a website under the domain name <socialsearch.com>, which hosts an incomplete and non-functional webpage. This page features a search box displaying the search suggestion “15hr jobs”, a term directly related to the Complainant’s main line of business in online job recruitment. This use of the disputed domain names appears to be merely intended to benefit from the Complainant’s reputation by confusing Internet users and leading them to believe that the site to which the disputed domain names relate is an official site of the Complainant. Hence, as established in section 2.5 of [WIPO Overview 3.0](#): “Fundamentally, a respondent’s use of a domain name will not be considered ‘fair’ if it falsely suggests affiliation with the trademark owner; the correlation between a domain name and the complainant’s mark is often central to this inquiry”. The disputed domain name <ziprecruitdr.com> resolves to an inactive website.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy contains a non-exhaustive list of factors evidencing registration and use in bad faith. Among others, it states that it is sufficient to support a finding of bad faith the fact that by using the domain names, the Respondent have intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website or location or of a product or service on the website or location.

In such connection, the Complainant has submitted evidence to support that the trademark ZIPRECRUITER is widely known and was registered and used many years before the Respondent registered the disputed domain names. The Respondent, when registering the disputed domain names, has targeted the Complainant's ZIPRECRUITER trademark to generate confusion among the Internet users and benefit from the Complainant's reputation.

Therefore, the Panel is satisfied that the Respondent must have been aware of the Complainant and the Complainant's trademark ZIPRECRUITER when it registered the disputed domain names. Consequently, and in accordance with Section 3.1.4 of [WIPO Overview 3.0](#), the Panel considers that the inclusion of the Complainant's ZIPRECRUITER trademark in the disputed domain names creates a presumption that the disputed domain names were registered in bad faith.

Furthermore, as previously indicated, some of the disputed domain names resolve to an incomplete and non-functional webpage, which features a search box displaying the search suggestion "15hr jobs", a term directly related to the Complainant's main line of business in online job recruitment. The Panel finds therefore that the Respondent's use of the disputed domain names is intended to attract and mislead Internet users when searching for the Complainant's website.

The disputed domain name <ziprecruitdr.com> resolves to an inactive website. However, as per Section 3.3 of [WIPO Overview 3.0](#), the fact that the disputed domain names do not resolve to an active website does not prevent a finding of bad faith under the doctrine of passive holding. (See also *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#)).

Even more, the Respondent has ignored the cease-and-desist letter from the Complainant, which aimed at resolving this matter amicably outside of this administrative proceeding.

Lastly, the Panel conducted an unofficial search and confirmed that the Respondent has been involved in previous UDRP proceedings. This confirms that the Respondent has already engaged in similar illicit behavior in the past.

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 <ziprecruiger.com>, <ziprecruitdr.com>, <ziprecruitef.com>, and <ziprecrukter.com> be transferred to the Complainant.

/Gustavo Patricio Giay/

Gustavo Patricio Giay

Sole Panelist

Date: October 23, 2025