

ADMINISTRATIVE PANEL DECISION

Instagram, LLC v. Tayyab s, Tayyab s
Case No. D2025-3678

1. The Parties

The Complainant is Instagram, LLC, United States of America (“United States”), represented by Perkins Coie, LLP, United States.

The Respondent is Tayyab s, Tayyab s, United Kingdom.

2. The Domain Names and Registrar

The disputed domain names <buychineseinstagramfollowers.com>, <buyfemaleinstagramfollowers.com>, <buyinstagramfolloweraustralia.com>, <buyinstagramfollowersbrazil.com>, <buyinstagramfollowerscanada.com>, <buyinstagramfollowersegypt.com> <buyinstagramfollowersfrance.com>, <buyinstagramfollowersitaly.com> <buyinstagramfollowersmalaysia.com>, <buyinstagramfollowersnetherlands.com>, <buyinstagramfollowersnigeria.com>, <buyinstagramfollowersportugal.com>, <buyinstagramfollowerspppl.com>, <buyinstagramfollowerssingapore.com> and <buykoreaninstagramfollowers.com> (collectively, the “Disputed Domain Names”) are registered with GMO Internet, Inc. d/b/a Discount-Domain.com and Onamae.com (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 10, 2025. On September 11, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On September 12, 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 (Whois Privacy Protection Service by onamae.com) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 12, 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 September 17, 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 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 8, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 10, 2025.

The Center appointed Nicholas Weston as the sole panelist in this matter on October 16, 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 operates a well-known online photo and video-sharing social-networking application and is a wholly owned subsidiary of United States social technology company Meta Platforms, Inc. It holds a portfolio of registrations for its trademark, and variations of it, in numerous countries. An example includes United States Registration No. 4,146,057 for the mark INSTAGRAM, registered on May 22, 2012.

The Complainant owns numerous domain names that comprise or contain the trademark INSTAGRAM, including the domain name <instagram.com>.

The Disputed Domain Names <buyfemaleinstagramfollowers.com>, <buyinstagramfollowerscanada.com>, <buyinstagramfollowersegyppt.com>, <buyinstagramfollowersmalaysia.com>, <buyinstagramfollowersnigeria.com>, <buyinstagramfollowerssingapore.com>, and <buykoreaninstagramfollowers.com> were registered on February 14, 2025.

The Disputed Domain Names <buychineseinstagramfollowers.com>, <buyinstagramfolloweraustralia.com>, <buyinstagramfollowersbrazil.com>, <buyinstagramfollowersfrance.com>, <buyinstagramfollowersitaly.com>, <buyinstagramfollowersnetherlands.com>, <buyinstagramfollowersportugal.com>, and <buyinstagramfollowersppl.com> were registered on February 15, 2025.

The Disputed Domain Names each resolved to a webpage that purports to offer for sale Instagram account “followers”. The Disputed Domain Names do not currently resolve to active websites.

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.

Notably, the Complainant cites its trademark registrations for the mark INSTAGRAM and variations of it, in several countries, as prima facie evidence of ownership.

The Complainant contends that its rights in that the mark INSTAGRAM mark predate the Respondent’s registration of the Disputed Domain Names. It submits that the Disputed Domain Names are confusingly similar to its trademark, because each is comprised of the INSTAGRAM trademark along with the terms “buy”, and “follower” or “followers”, and one of the following geographic or descriptive modifiers: “australia”, “brazil”, “canada”, “chinese”, “egypt”, “female”, “france”, “italy”, “korean”, “malaysia”, “netherlands”, “nigeria”,

“portugal”, “ppl”, and “singapore”, under the gTLD “.com”, and that these variables are not sufficient to avoid the confusing similarity.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Names because it “has not authorized Respondent to make any use of its INSTAGRAM Trademarks, in a domain name, in a mobile app, in the use of its logos on the website, or otherwise” and that none of the circumstances set out in paragraph 4(c) of the Policy apply.

Finally, the Complainant alleges that the registration and use of the Disputed Domain Names were, and currently are, in bad faith, contrary to the Policy and the Rules having regard to the prior use and distinctive nature of the Complainant’s trademark. On the issue of registration, the Complainant states that its “INSTAGRAM Trademark is inherently distinctive, widely known throughout the world” and that “Respondent’s registration of multiple domain names targeting Complainant’s INSTAGRAM Trademarks is evidence of Respondent’s bad faith” citing *Instagram, LLC v. Rochelle Burrell*, WIPO Case No. [D2021-1294](#). On the issue of use the Complainant contends that “services that offer likes and followers on Complainant’s Instagram platform, have uniformly determined that such services constitute bad faith registration and use with intent to profit from the notoriety of Complainant’s Trademarks” citing *Instagram, LLC v. Privacy Administrator, Anonymize, Inc. and WhoisGuard Protected, WhoisGuard, Inc. / Kamil Abbasov, AzeriJob LLC / Vien Tran / Modstas Geiga, UAB Modauksa / Yacine Fihri*, WIPO Case No. [D2020-2786](#) and *Instagram, LLC v. Rolf Berwers, Namik Hondzo, Rolf Rolf*, WIPO Case No. [D2024-3261](#) in support of its submission that this amounts to use in bad faith.

B. Respondent

The Respondent did not reply to the Complainant’s contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Complainant has the burden of proving the following:

- (i) that the Disputed Domain Names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Names; and
- (iii) that the Disputed Domain Names have been 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 Names. 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. The requirements of the first element for purposes of the Policy may be satisfied by a trademark registered in any country. [WIPO Overview 3.0](#), section 1.2.1. The Complainant has produced sufficient evidence to demonstrate that it has registered trademark rights in the mark INSTAGRAM in several countries.

Turning to whether the Disputed Domain Names are identical or confusingly similar to the INSTAGRAM trademark, the Panel observes that:

— the Disputed Domain Name <buychineseinstagramfollowers.com> is comprised of: (a) the word “buy”; (b) followed by the nationality “chinese”; (c) followed by the Complainant’s trademark; (d) followed by the word “followers”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyfemaleinstagramfollowers.com> is comprised of: (a) the word “buy”; (b) followed by the word “female”; (c) followed by the Complainant’s trademark; (d) followed by the word “followers”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfolloweraustralia.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “follower”; (d) followed by the country name “australia”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersbrazil.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “brazil”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowerscanada.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “canada”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersegypt.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “egypt”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersfrance.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “France”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersitaly.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “italy”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersmalaysia.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “malaysia”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersnetherlands.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “netherlands”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersnigeria.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “nigeria”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersportugal.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “portugal”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowersppl.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the letters “ppl”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buyinstagramfollowerssingapore.com> is comprised of: (a) the word “buy”; (b) followed by the Complainant’s trademark; (c) followed by the word “followers”; (d) followed by the country name “singapore”; (e) followed by the gTLD “.com”.

— the Disputed Domain Name <buykoreaninstagramfollowers.com> is comprised of: (a) the word “buy”; (b) followed by the nationality “korean”; (c) followed by the Complainant’s trademark; (d) followed by the word “followers”; (e) followed by the gTLD “.com”.

It is well established that the gTLD used as part of a domain name is generally disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11. The relevant comparison to be made is with the second-level portion of each of the two Disputed Domain Names, specifically:

“buychineseinstagramfollowers”, “buyfemaleinstagramfollowers”, “buyinstagramfolloweraustralia”, “buyinstagramfollowersbrazil”, “buyinstagramfollowerscanada”, “buyinstagramfollowersegypt”, “buyinstagramfollowersfrance”, “buyinstagramfollowersitaly”, “buyinstagramfollowersmalaysia”, “buyinstagramfollowersnetherlands”, “buyinstagramfollowersnigeria”, “buyinstagramfollowersportugal”, “buyinstagramfollowersppl”, “buyinstagramfollowerssingapore”, and “buykoreaninstagramfollowers”, respectively.

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 also. [WIPO Overview 3.0](#), section 1.7.

Although, the addition of the such as “buy”, and “follower” or “followers”, and geographic or descriptive modifiers: “australia”, “brazil”, “canada”, “chinese”, “egypt”, “female”, “france”, “italy”, “Korean”, “malaysia”, “netherlands”, “nigeria”, “portugal”, “ppl”, and “singapore”, may bear on assessment of the second and third elements in relation to the Disputed Domain Names, the Panel finds the addition of those terms does not prevent a finding of confusing similarity between that Disputed Domain Names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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 Disputed Domain Names (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 Panel finds that there is no indication that the Respondent was commonly known by the term “instagram” prior to registration of the Disputed Domain Names. The Complainant has not licensed, permitted, or authorized the Respondent to use the trademark INSTAGRAM. The Panel also notes that the composition of the Disputed Domain Names carries a risk of implied affiliation (see [WIPO Overview 3.0](#), section 2.5.1).

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 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.

The Panel notes the evidence that each of the Disputed Domain Names resolve to an inactive webpage, which supports the Complainant's evidence, and finds neither this nor the previous trading on the goodwill of the Complainant's trademarks, represent a bona fide offering of goods or services, or a legitimate noncommercial or fair use, given the substantial reputation and goodwill of the Complainant's mark or capacity to otherwise mislead Internet users.

The Panel finds the second element of the Policy has been established for the Disputed Domain Names.

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

In the present case, the Panel finds that the evidence in the case shows the Respondent registered and has used the Disputed Domain Names in bad faith.

On the issue of registration, taking into account the composition of the Disputed Domain Names and the distinctive nature of the Complainant's trademark, the Panel is satisfied that the Respondent knew of and targeted the Complainant's trademark INSTAGRAM when it registered the Disputed Domain Names.

This Panel finds that there is no reason for the Respondent to have registered the Disputed Domain Names other than to trade off the reputation and goodwill of the Complainant's well-known trademark. [WIPO Overview 3.0](#), section 3.1.4.

Further, a gap of several years between registration of a complainant's trademark and respondent's registration of a disputed domain name (containing the trademark) may indicate bad faith registration. In this case, the Respondent registered the Disputed Domain Names around 13 years after the Complainant established registered trademark rights in the INSTAGRAM mark. The Respondent has not come forward to rebut the Complainant's allegations or offer any alternative explanation.

On the issue of use, the Disputed Domain Names do not currently resolve to active websites.

Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. Although panelists will look at the totality of the circumstances in each case, factors that have been considered relevant in applying the passive holding doctrine include: (i) the degree of distinctiveness or reputation of the complainant's mark, (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, and (iii) the implausibility of any good faith use to which the domain name may be put. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the Complainant's well-known INSTAGRAM trademark, the composition of the Disputed Domain Names, and the Respondent's failure to provide any evidence of actual or contemplated good-faith use and finds that in the circumstances of this case the passive holding of the Disputed Domain Names does not prevent a finding of bad faith under the Policy.

The Complainant's evidence is also that the Disputed Domain Names all resolved, for a period of time, to, it submits: "website content [...] [that] made use of Complainant's Trademarks as well as its design trademark, in order to offer putative sale of Instagram followers services, which Respondent refers to as 'Buy IG Followers' and 'Buy Instagram Followers.' Further increasing potential consumer confusion, each website prominently featured the Complainant's Trademarks, including Complainant's famous logo trademark and word mark. All sites displayed the same distinctive image containing Complainant's INSTAGRAM design marks, creating a consistent visual identity across the portfolio." Targeting of this nature is a common

example of bad faith as referred to in paragraph 4(b)(iv) of the Policy and identified in many previous UDRP decisions. [WIPO Overview 3.0](#), sections 3.1.4 and 3.2.1.

Panels have held that the use of a domain name for illegitimate activity here, claimed impersonation or passing off, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. There is also evidence that the Respondent provided false contact details to shield its identity when registering the Disputed Domain Names. Previous administrative panel decisions have found that providing false information for the Whois database to shield a registrant's identity (which is also in breach of the registration agreement) is clear evidence of the respondent's knowledge of the complainant's rights at the time of registration and can support an inference of bad faith. [WIPO Overview 3.0](#), section 3.2.1. Having reviewed the record, the Panel finds the Respondent's registration and use of the Disputed Domain Names constitutes bad faith under the Policy.

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 <buychineseinstagramfollowers.com>, <buyfemaleinstagramfollowers.com>, <buyinstagramfolloweraustralia.com>, <buyinstagramfollowersbrazil.com>, <buyinstagramfollowerscanada.com>, <buyinstagramfollowersegypt.com>, <buyinstagramfollowersfrance.com>, <buyinstagramfollowersitaly.com>, <buyinstagramfollowersmalaysia.com>, <buyinstagramfollowersnetherlands.com>, <buyinstagramfollowersnigeria.com>, <buyinstagramfollowersportugal.com>, <buyinstagramfollowersppl.com>, <buyinstagramfollowerssingapore.com>, and <buykoreaninstagramfollowers.com> be transferred to the Complainant.

/Nicholas Weston/

Nicholas Weston

Sole Panelist

Date: October 22, 2025