

ADMINISTRATIVE PANEL DECISION

VFS Global Services PLC v. Cathy Reed, Cathy Reed
Case No. D2025-3868

1. The Parties

The Complainant is VFS Global Services PLC, United Kingdom, represented by Aditya & Associates, India.

The Respondent is Cathy Reed, Cathy Reed, United States of America ("US").

2. The Domain Name and Registrar

The disputed domain name <vfs-helplines.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 September 23, 2025. On September 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 24, 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 (CATHY REED, Withheld for Privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 25, 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 25, 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 October 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 26, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 29, 2025.

The Center appointed Benoit Van Asbroeck as the sole panelist in this matter on November 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 visa application service provider based in the United Kingdom. The Complainant was established in 2001 and is currently present in over 150 countries worldwide. The Complainant owns, inter alia, the following registered trademarks:

- International Trademark No. 1752806 for , registered on September 20, 2024, in International Classes 35, 39, and 42;
- US Trademark No. 79379660 for , registered on July 18, 2024, in International Classes 35, 39, and 42;
- United Kingdom Trademark No. UK00003875879 for , registered on April 28, 2023, in International Classes 35, 39, and 42.

In addition, a group company of the Complainant owns a domain name containing the VFS mark, namely <vfsglobal.com>.

The disputed domain name was registered on June 27, 2024, well after the Complainant secured rights in the mark VFS. The disputed domain name currently forwards to the Complainant's official website under its <vfsglobal.com> domain name. In addition, as further detailed below, the Complainant has shown that the disputed domain name has previously been used to create an email address that was used as part of an employment fraud scheme.

The Respondent appears to be a private individual based in the US.

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.

With respect to the first element, the Complainant contends that it has rights in the mark VFS and that the disputed domain name is confusingly similar to this mark.

Regarding the second element, the Complainant claims that the Respondent lacks rights or legitimate interests in the disputed domain name. The Complainant notes that they have registered their trademarks in the VFS mark prior to the date of registration of the disputed domain name. Furthermore, the Complainant submits that the Respondent is not or has not been commonly known by VFS, does not own any trademarks in VFS, and has not acquired any reputation and/or goodwill in VFS. Moreover, the Complainant also confirms that it has not ever granted the Respondent any right, license, authorization or consent to use its trademarks in VFS. Finally, the Complainant points to the Respondent's previous use of the disputed domain name to deceive consumers by misrepresenting the origin of the visa services they (previously) offered.

As to the third element, the Complainant claims that the Respondent must have been aware of the Complainant's services, prior rights, and ownership of the VFS trademarks as well as the <vfsglobal.com> domain name since the VFS trademarks have an extensive worldwide reputation and the Respondent intentionally adopted the disputed domain name to deceive the general public. In particular, the Complainant points out that it has received multiple complaints regarding what appears to be an employment fraud scheme involving an email address set up using the disputed domain name, [...]@vfs-helplines.com. The Complainant claims that the email address is used to impersonate the Complainant since emails containing a fake job offer (ostensibly) originating from Canadex Petroleum mention that the recipient should contact a representative of the Complainant through the abovementioned email address. The Complainant concludes that by registering the confusingly similar disputed domain name and by creating the above email address, the Respondent has misrepresented to third parties that their business is an authorized service provider and/or associated/connected with the business carried on by the Complainant, which is clear evidence of bad faith. The Complainant also relies on the passive holding doctrine to submit that the non-use or passive holding of the disputed domain name does not prevent a finding of bad faith. Finally, the Complainant points out that the contact details provided by the Respondent in the Whois records are false, which is another indication of bad faith.

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 the VFS mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. It should be noted that all of the trademarks which the Complainant relies on are figurative, however these can be taken into account to show "rights in a mark" as well since the dominant element of the trademarks is the word element "VFS". It is a consensus view of UDRP panels, with which the Panel agrees, that trademark registrations with design elements can prima facie satisfy the requirement that a complainant shows "rights in a mark" so long as the textual elements are not overtaken. [WIPO Overview 3.0](#), section 1.10.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms, here a hyphen and the words "helplines", may bear on assessment of the second and third elements, the Panel finds the addition of such (descriptive) terms does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

Finally, as for the applicable gTLD ".com", the Panel holds that this can be disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1.

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.

The Panel finds that the Respondent does not use, nor has the Respondent made demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services and the Respondent has not made a legitimate noncommercial or fair use of the disputed domain name. On the contrary, it appears that the disputed domain name currently merely redirects to the <vfsglobal.com> domain name, which resolves to the Complainant’s official website. This kind of use of the disputed domain name does not represent a bona fide offering and does not support rights or legitimate interests in the disputed domain name. Moreover, the Complainant has shown that the disputed domain has previously been used for illegitimate or illegal activity, namely an employment fraud scheme, which can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

In addition, the Complainant confirmed that the Respondent is not affiliated with the Complainant in any way, nor has the Complainant licensed, authorized, or permitted the Respondent to register domain names incorporating the Complainant’s trademarks. The Panel has taken note of the Complainant’s confirmation in this regard and has not seen any evidence that would suggest the contrary. In the absence of any license or permission from the Complainant to use its trademarks, no actual or contemplated bona fide or legitimate use of the disputed domain name could reasonably be claimed (see, e.g., *Sportswear Company S.P.A. v. Tang Hong*, WIPO Case No. [D2014-1875](#); and *LEGO Juris A/S v. DomainPark Ltd, David Smith, Above.com Domain Privacy, Transure Enterprise Ltd, Host master*, WIPO Case No. [D2010-0138](#)).

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 intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant’s marks (Paragraph 4(b)(iv) of the Policy). The disputed domain name has previously been used to create an email address that was used to impersonate the Complainant as part of an employment fraud scheme. These circumstances, in combination with the Respondent’s clear absence of rights or legitimate interests in the disputed domain name, are strong indicators of 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.

The Panel believes that the Respondent knew or, at least, should have known at the time of registration that the disputed domain name included the Complainant's VFS trademarks. As demonstrated by the Complainant, these trademarks were registered before the registration of the disputed domain name, including in the country of residence of the Respondent, the US. Furthermore, the disputed domain name incorporates the VFS trademark in its entirety and includes the merely descriptive term "helplines". Moreover, the disputed domain name currently resolves to the Complainant's official website and was previously used to impersonate the Complainant as part of an employment fraud scheme. This indicates that the Respondent had the Complainant and its trademarks in mind when registering the disputed domain name. The Respondent's knowledge of the Complainant and its trademarks and therefore its registration in bad faith of the disputed domain name may accordingly also be inferred from these circumstances. [WIPO Overview 3.0](#), section 3.2.2.

Furthermore, panels have held that the use of a domain name for illegitimate or illegal activity, here an employment fraud scheme, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

Accordingly, having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name 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 name <vfs-helplines.com> be transferred to the Complainant.

/Benoit Van Asbroeck/

Benoit Van Asbroeck

Sole Panelist

Date: November 20, 2025