

ADMINISTRATIVE PANEL DECISION

Instagram, LLC v. Washib Khan, Grynow
Case No. D2025-4044

1. The Parties

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

The Respondent is Washib Khan, Grynow, India.

2. The Domain Name and Registrar

The disputed domain name <instafollowersbuy.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 October 2, 2025. On October 3, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 3, 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 October 7, 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 amendment to the Complaint on October 10, 2025.

The Center verified that the Complaint together with the amendment to the 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 14, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 3, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on November 3, 2025.

The Center appointed Rodrigo Velasco Santelices as the sole panelist in this matter on November 12, 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, Instagram LLC, is a world-renowned online photo- and video-sharing social-networking service and mobile application. Since its launch in 2010, Instagram has rapidly acquired and developed considerable goodwill and renowned worldwide. Acquired by Facebook, Inc. (now Meta Platforms, Inc.) in 2012, today Instagram has more than three billion monthly active accounts worldwide.

Instagram has consistently ranked among the top “apps” for mobile devices, including for iOS and Android operating systems. Instagram has been the recipient of numerous awards, including “App of the Year” in 2011 from Apple Inc. Instagram is among the most downloaded apps worldwide.

Given the primarily online nature of the Complainant’s business, the Complainant’s domain names consisting of its trademarks are not only at the core of its business but are also a primary way for its billions of users worldwide to enjoy and make the most of the Complainant’s services. The Complainant is the registrant of numerous domain names consisting of or including the INSTAGRAM or INSTA trademarks under a wide range of generic Top-Level Domains (“gTLD”) and country code Top-Level Domains (“ccTLD”). Copies of the Whois records for a selection of the Complainant’s domain names featuring the INSTAGRAM or INSTA trademarks were provided as an Annex of the Complaint.

The Complainant has also made substantial investments to develop a strong presence online by being active on various social-media platforms, including Facebook, X (formerly Twitter), and LinkedIn. For instance, Instagram’s official Facebook page has over sixty-one million Facebook “likes”, and Instagram’s official X account has over thirty-three million followers.

In addition to its strong online presence, the Complainant has secured ownership of numerous trademark registrations for INSTAGRAM, INSTA, IG, and various stylized and design trademarks (collectively the “INSTAGRAM Trademarks” or “Complainant’s Trademarks”) in many jurisdictions throughout the world. A representative brief summary of the numerous Complainant’s trademark registrations is the following:

Trademark INSTAGRAM, registered in the United States of America, under number 4146057, dated May 22, 2012, in international class 9.

International Trademark INSTAGRAM, registered under number 1129314, dated March 15, 2012, in classes 9 and 42.

Trademark INSTAGRAM, registered in India, under number 2645896, dated December 19, 2013, in class 9.

Trademark INSTAGRAM (handwritten style) in the United States of America, under number 4795634, dated August 18, 2015, in classes 9, 38, 41, 42 and 45.

Trademark INSTA, registered in the European Union, under number 18359602, dated February 9, 2023, in classes 9 and 42.

This dispute concerns the disputed domain name <instafollowersbuy.com> that was registered on July 7, 2021.

The Respondent has configured the disputed domain name to resolve to content that specifically targets the Complainant by offering Instagram likes, comments, and followers for sale, whilst making prominent use of the Complainant’s Trademarks. For example, the Respondent’s website prominently states: “BUY INSTAGRAM FOLLOWERS [...]”; Most trusted Instagram services [...] (Buy Instagram followers cheap!).

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 it is the owner of the registered trademarks INSTAGRAM and INSTA, so it cannot be questioned that the disputed domain name <instafollowersbuy.com> is confusingly similar to the Complainant's Trademarks. The disputed domain name reproduces the INSTA trademark in its entirety, which is followed by the terms "followers" and "buy". It is also composed of the dominant part of the INSTAGRAM Trademark, "INSTA." The dominant part of the INSTAGRAM trademark, "INSTA", is often used to refer to the Complainant's Instagram app, and the Complainant owns well-established and registered rights in the INSTA trademark.

The addition of the terms "followers" and "buy" is not sufficient to dispel the ensuing confusing similarity between the Complainant's INSTA and INSTAGRAM Trademarks and the disputed domain name. Moreover, the addition of the term "followers" adds to the confusing similarity because Instagram users "follow" each other on the social media platform. The applicable gTLD, in this case ".com," may be disregarded for the purposes of assessment under the first element, as it is viewed as a standard registration requirement.

For reasons set out above, and pursuant to paragraph 4(a)(i) of the Policy, the Complainant has strong rights in the well-known INSTA and INSTAGRAM Trademarks, and the disputed domain name is confusingly similar to them.

Thus, the Complainant further states that the Respondent clearly had the Complainant's Trademarks in mind when registering the disputed domain name in order to exploit and profit from its trademark rights. Respondents who knowingly adopt a third party's well-known trademark as a domain name cannot claim the benefit of Paragraph 4(c)(i) of the Policy to establish rights to it based merely on use to offer putative goods or services prior to the notice of a dispute.

Further, the Respondent's website content is likely to confuse users into believing that the disputed domain name and the Respondent's unauthorized, fraudulent sale of Instagram likes, comments, and followers are operated by, approved of, sponsored by, or affiliated with the Complainant. Thus, the Complainant states that this implied affiliation or sponsorship cannot constitute legitimate or noncommercial fair use under the Policy. See *Instagram, LLC v Ihor Grigoriev, Ivan Vasiliev*, WIPO Case No. [D2023-4111](#) (<finsta.pro>, et al.) ("[T]he disputed domain names have been used to mislead unsuspecting Internet users through the incorporation of the Complainant's famous INSTA and IG trademarks and directing said Internet users to [...] websites whose content compounds the risk of affiliation through the use of the Complainant's INSTAGRAM trademark...").

Furthermore, the Complainant contends that the Respondent has configured the disputed domain name to resolve to a commercial website that offers for sale likes, comments, and followers on the Complainant's Instagram platform.

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

The entirety of the INSTA 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 - such as "followers" and "buy"- may bear on assessment of the second and third elements, the Panel finds the addition of such 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.

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. Furthermore, the Panel considers that the composition of the disputed domain name carries a risk of implied affiliation with the Complainant. [WIPO Overview 3.0](#), section 2.5.1.

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 Complainant's Trademarks were registered several years prior to the registration of the disputed domain name. Trademark INSTAGRAM is well known, and so is trademark INSTA. Therefore, the Respondent knew or should have known the Complainant's Trademarks when registering the disputed domain name. The Panel finds that this fact cannot be a simple coincidence.

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 finds that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website, by creating a likelihood of confusion with the Complainant's Trademarks as to the source, sponsorship, or endorsement of the disputed domain name, in bad faith pursuant to paragraph 4(b)(iv) of the Policy.

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 <instafollowersbuy.com> be transferred to the Complainant.

/Rodrigo Velasco Santelices/

Rodrigo Velasco Santelices

Sole Panelist

Date: November 21, 2025