

ADMINISTRATIVE PANEL DECISION

American Society of Hematology, Inc. v. AJMAL KHAN, JOPTECH
Case No. D2025-4123

1. The Parties

The Complainant is American Society of Hematology, Inc., United States of America (“United States”), represented by Nelson Mullins Riley & Scarborough LLP, United States.

The Respondent is AJMAL KHAN, JOPTECH, India.

2. The Domain Name and Registrar

The disputed domain name <25ash.org> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 8, 2025. On October 9, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 9, 2025, the Registrar transmitted by email to the Center its verification disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 10, 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 October 15, 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 16, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 5, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on November 12, 2025.

The Center appointed Moonchul Chang as the sole panelist in this matter on November 17, 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 one of the world's largest professional societies serving both clinicians and scientists around the world in the field of hematology. The Complainant was formed as an association more than 60 years ago in 1958 and has grown to more than 17,000 members from nearly 100 countries. The Complainant's mission is to further the understanding, diagnosis, treatment, and prevention of disorders affecting the blood, bone marrow, and the immunologic, hemostatic and vascular systems, by promoting research, clinical care, education, training, and advocacy in hematology. For more than six decades, the Complainant has sponsored its annual meeting, which is annual education and scientific event in the field of hematology.

The Complainant owns the trademarks ASH, which were registered in numerous jurisdictions including as follows:

- United States trademark registration for ASH no. 3253642 registered on June 19, 2007, in classes 16 and 35;
- United States trademark registration for ASH no. 5570785 registered on September 25, 2018, in classes 9, 16, 35, 36, 41 and 42; and
- United States trademark registration for ASH no. 6153600 registered on September 15, 2020, in class 44.

The disputed domain name <25ash.org> was registered on June 14, 2025. At the time of filing this Complaint, the Respondent has used the disputed domain name to host the email address "[...].@25ash.org" in connection with a conference registration directed at potential attendees of the Complainant's annual meeting.

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 contends that:

- (a) the disputed domain name is confusingly similar to trademarks ASH in which the Complainant has rights.
- (b) the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant has not authorized the Respondent to use the ASH mark, and the Respondent is not the Complainant's authorized conference registration and housing reservations service provider. The Respondent is not using the disputed domain name in connection with a bona fide offering of goods. In addition, the Respondent is not commonly known by the name "ASH" or "25ASH".
- (c) the disputed domain name was registered and is being used in bad faith. The Respondent has actual or constructive knowledge of the Complainant's trademarks. The Respondent has used the disputed domain name to impersonate the Complainant in furthering the Respondent's conference registration scam, which constitutes bad faith use of the disputed domain name.

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 must demonstrate that the three elements enumerated in paragraph 4(a) of the Policy have been satisfied. These elements are that: (i) the disputed domain name is identical or confusingly similar to the Complainant's trademark or service mark; (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and (iii) 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). The disputed domain name incorporates the Complainant's trademarks in their entirety with the addition of the term "25". The Panel finds the addition of such term 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) In addition, the generic Top-Level Domain ("gTLD") ".org" is disregarded under the first element test. ([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.

Under paragraph 4(a)(ii) of the Policy, the overall burden of proof is on the Complainant. However, once the Complainant presents a prima facie case that the Respondent has no rights or legitimate interests in the disputed domain name, the burden of production of evidence 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).

Firstly, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. Although the Complainant has not given the Respondent permission, authorization, consent, or license to use its ASH mark, the Respondent registered and has used the disputed domain name which includes the Complainant's trademark.

Secondly, the Complainant contends that the Respondent is not using the disputed domain names in connection with a bona fide offering of goods or services or fair use of the disputed domain name. Here, the Respondent has used the disputed domain name in connection with the solicitation email to defraud potential attendees of the Complainant's annual conference. The Panel considers that such an illegal activity can never confer rights or legitimate interests on a respondent with a bona fide offering of goods or services or fair use of the disputed domain name. ([WIPO Overview 3.0](#), section 2.13.1.) Accordingly, the Panel finds that the Respondent does not use them in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain names under these circumstances. ([WIPO Overview 3.0](#), section 2.4).

Thirdly, there is no evidence to suggest that the Respondent has been commonly known by 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 name such as those enumerated in the Policy or otherwise.

Therefore, the Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Paragraph 4(a)(iii) of the Policy requires that the disputed domain name has "been registered and is being used in bad faith". Thus, for the Complainant to succeed, a UDRP panel must be satisfied that a domain name has been registered and is being used in bad faith. These requirements are conjunctive; each must be proven, otherwise the Complaint fails. In addition, 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).

Firstly, the Complainant's trademark is well-known and as the disputed domain name includes the Complainant's trademark in its entirety with addition of the term "25" which would be recognized as an abbreviation of the current year 2025. Under this circumstance, it is clear that the Respondent was aware of the Complainant's trademark and targeted it at the time of registration of the disputed domain name. The Panel considers it is bad faith registration that the Respondent deliberately chose the disputed domain name to create a likelihood of confusion with the Complainant's ASH trademark, so as to create a false association or affiliation with the Complainant.

Secondly, as earlier mentioned, the Respondent has used the disputed domain name in connection with the solicitation email to defraud potential attendees of the Complainant's annual conference. This demonstrates that the Respondent impersonated the Complainant in furthering the Respondent's illegal scam. The Panel considers that such an illegal activity constitutes bad faith use of the disputed domain name. ([WIPO Overview 3.0](#), section 3.4)

Having reviewed the available record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

Therefore, the Panel concludes that the Complainant has satisfied 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 <25ash.org> be transferred to the Complainant.

/Moonchul Chang/

Moonchul Chang

Sole Panelist

Date: December 1, 2025