

ADMINISTRATIVE PANEL DECISION

Google LLC v. Subhash Kumar
Case No. D2025-4210

1. The Parties

The Complainant is Google LLC, United States of America (“United States”), represented by Fidus Law Chambers, India.

The Respondent is Subhash Kumar, India.

2. The Domain Name and Registrar

The disputed domain name <googleindia.org> 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 14, 2025. On October 14, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 22, 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 23, 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 27, 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 27, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 16, 2025. The Respondent sent an email communication to the Center on November 13, 2025. The Complainant filed a request for suspension of the proceeding on November 18, 2025. On the same date, the Center suspended the proceeding until December 18, 2025. The Center received a request from the Complainant to reinstitute the proceeding on

December 18, 2025. On the same date, the Center reinstated the proceeding and informed the parties that it will proceed to panel appointment.

The Center appointed Assen Alexiev as the sole panelist in this matter on December 24, 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 was established in 1998. It is the owner and operator of the Internet search engine Google, which is globally accessible in 150 languages. The Complainant has more than 150 offices worldwide in more than 60 countries and its products and services reach more than 200 countries worldwide, including India, where the Respondent is located. The Complainant operates its official website for the Google search engine at the domain name <google.com>, registered on September 15, 1997. SimilarWeb, the web traffic ranking company, lists the website of the Google search engine as the most-visited website in many countries, including India.

The Complainant is the owner of a number of trademark registrations for GOOGLE (the “GOOGLE trademark”), including the following representative registrations:

- the Indian trademark GOOGLE (word) with registration No. 845041, registered on March 12, 1999, for goods in International Class 9;
- the United States trademark GOOGLE (word) with registration No. 2954071, registered on May 24, 2005, for goods and services in International Classes 9, 16, 18, 21, 25 and 35; and
- the Indian trademark GOOGLE (combined) with registration No. 2297910, registered on March 13, 2012, for services in International Class 42.

The disputed domain name was registered on March 9, 2022. It is currently inactive. At the time of filing of the Complaint in October 2025, the disputed domain name directed to a website with the title “Google India: Breaking News, Education, Sports, India, Entertainment, Live Samachar in Hindi of Business”. The website described itself as offering the “latest job notifications, admit card, results, scholarships, banking, railway and teaching jobs”. Some of the links on the website redirected to commercial offering of third parties. The website displayed the following disclaimer (in relevant part):

“Friends, you all are very welcome on our website ‘www.googleindia.org’. For your information, let us tell you that this website is not being run by any government, nor is this website related to any ministry. The main objective of this website is to give correct information about any type of schemes and also to give information about the recruitments released by the government. [...]”

The Respondent’s website did not mention the Complainant and did not disclose the absence of relationship with it.

On March 13, 2025, the Complainant sent a cease-and-desist letter to the Respondent, and a reminder on April 2, 2025. On April 22, 2025, the Respondent replied in the following terms (in relevant part):

“Thank you for your email and for bringing this matter to my attention.
I acknowledge that I had registered the domain <googleindia.org> and had used it in the past.

However, I would like to clarify that the domain has not been in use for the past one year, and I am now removing it completely from hosting, thereby shutting down the website.

I have never had any intention to misuse the name or brand of Google in any manner. I assure you that I will not use this domain in the future under any circumstances. Thank you for your understanding and cooperation.”

On September 26, 2025, the Complainant wrote again to the Respondent, stating that despite the undertakings of the Respondent in its earlier correspondence, the website at the disputed domain name was activated again. The Respondent did not reply to this email.

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.

The Complainant states that the disputed domain name is confusingly similar to its GOOGLE trademark, because it incorporates this trademark in its entirety. The Complainant notes that the inclusion of “India”, which denotes the geographical location of the Respondent’s purported offerings, and of the “.org” generic Top-Level Domain (“gTLD”) in the disputed domain name does not affect the overall impression created by the disputed domain name that the associated website is the Complainant’s blog for the Indian audience. The Complainant maintains that it has prior rights in the GOOGLE trademark and the public is well aware of it such that unauthorized use of the same is likely to create an impression in the minds of consumers that the disputed domain name is associated with, or is sponsored by the Complainant, which is not the case. The Complainant adds that its Indian affiliate is referred to as “Google India”, which further enhances the likelihood of confusion.

According to the Complainant, the Respondent has no rights or legitimate interests in respect of the disputed domain name, because the Complainant has never authorized him to use the GOOGLE trademark, and the Respondent is not affiliated with the Complainant or commonly known by the disputed domain name. The Complainant notes that the disputed domain name was registered on March 9, 2022, which is over two decades after the adoption of the GOOGLE trademark by the Complainant.

According to the Complainant, the Respondent’s use of the GOOGLE trademark in the disputed domain name to run the blog “Google India” is intended to create an association with the Complainant and to exploit the goodwill of the trademark by falsely appearing as created by the Complainant for the Indian audience. The Complainant adds that the Respondent’s website also features advertisements which shows that the Respondent uses it for commercial gain. The Complainant points out that the landing page of the website at the disputed domain name features a disclaimer that the Respondent’s blog is not associated with any government body, and leaves out the Complainant on purpose.

The Complainant contends that the disputed domain name was registered and is being used in bad faith. In the Complainant’s view, the Respondent intentionally attempts to create a likelihood of confusion with the Complainant’s trademark as to the affiliation or endorsement by the Complainant of the services offered through the disputed domain name.

The Complainant notes that it attempted to amicably resolve the matter by sending a legal notice to the Respondent, who initially showed false compliance with the Complainant’s demands, but then resumed hosting the website at the disputed domain name.

B. Respondent

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

With his informal communication to the Center, the Respondent made the following statement:

“I do not wish to contest or proceed with this dispute. Therefore, I voluntarily request the immediate deletion and permanent removal of the domain ‘GoogleIndia.org’ from my GoDaddy account to avoid any further legal or trademark issues. GoDaddy Support has informed me that the domain is currently locked due to the ongoing dispute and cannot be deleted from their end. Hence, I kindly request WIPO to instruct GoDaddy (the Registrar) to unlock and delete the domain as per my consent.”

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

The Panel finds that the GOOGLE trademark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the GOOGLE trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms (here, “India”) may bear on assessment of the second and third elements, 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.

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.

With his informal communication to the Center, the Respondent did not deny the Complainant’s statements or dispute the evidence submitted with the Complaint. The Complaint includes evidence showing that prior to the commencement of the proceeding, the Respondent accepted the Complainant’s demands to deactivate the disputed domain name and to cease using the associated website, and undertook that “[he] will not use this domain in the future under any circumstances”. Nevertheless, the Respondent later

reactivated the website at the disputed domain name, and deactivated it again after the commencement of the proceeding. Such inconsistent conduct does not suggest that the Respondent genuinely believed that he had rights or legitimate interests in the disputed domain name.

As discussed in section 2.5 of the [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. Here, the disputed domain name is confusingly similar to the famous GOOGLE trademark of the Complainant, and the combination of this trademark with the geographical term "India" makes it appear as the official online location of the Complainant for India. The disputed domain name has been used for a website named "Google India" which displayed various content and links, some of which redirected to third-party commercial websites, and included a disclaimer for the absence of any relationship with government institutions, but omitted to mention the Complainant and to disclose the absence of relationship with it.

Considering the above, and in the light of the Respondent's conduct as evidenced by the Complainant, the Panel finds that it is more likely than not that by registering and using the disputed domain name, the Respondent has attempted to illegitimately exploit the goodwill of the Complainant's GOOGLE trademark for commercial gain by attracting online traffic to its website and to third party commercial websites. Such conduct does not give rise to rights or legitimate interests in the disputed domain name.

The Panel therefore finds that 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.

As discussed above in this decision, the disputed domain name is confusingly similar to the famous GOOGLE trademark and appears as the official online location of the Complainant for India. It has been used for a website containing various information and links, some of which redirected to third-party commercial websites, without disclosing the absence of relationship with the Complainant. The Respondent does not deny the Complainant's contentions, and prior to the proceeding, he undertook to the Complainant to deactivate his website, but then reactivated it again.

This supports a finding that by registering and using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to an online location at the disputed domain name, by creating a likelihood of confusion with the Complainant's GOOGLE trademark as to the source of the Respondent's online location or of the content provided there, which supports a finding of bad faith under paragraph 4(b)(iv) of 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 <googleindia.org> be transferred to the Complainant.

/Assen Alexiev/

Assen Alexiev

Sole Panelist

Date: January 2, 2026