

ADMINISTRATIVE PANEL DECISION

WhatsApp LLC v. Talentdwar Technologies

Case No. D2025-4335

1. The Parties

The Complainant is WhatsApp LLC, United States of America ("United States"), represented by Perkins Coie, LLP, United States.

The Respondent is Talentdwar technologies, India.

2. The Domain Name and Registrar

The disputed domain name <aiwhatsappbot.com> is registered with PDR Ltd. d/b/a PublicDomainRegistry.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 22, 2025. On October 23, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 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 (Domain Admin, Privacy Protect, LLC (PrivacyProtect.org)) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 27, 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 31, 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 November 4, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 24, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on November 27, 2025.

The Center appointed Gökhan Gökçe as the sole panelist in this matter on December 3, 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 WhatsApp LLC, a United States-based technology company operating the widely known WhatsApp messaging and voice-over-IP service and mobile application. Founded in 2009 and acquired by Facebook, Inc. (now Meta Platforms, Inc.) in 2014. The Complainant also provides the WhatsApp Business application and the WhatsApp Business Platform, enabling small and large businesses to interact with customers efficiently through automated tools and programmatic access. The Complainant's platform is offered in approximately sixty languages and ranks among the most-downloaded and most-used mobile applications globally. The Complainant owns numerous trademark registrations for the WHATSAPP trademark and operates, among others, the official domain name <whatsapp.com>, as well as multiple domain names incorporating the WHATSAPP trademark.

The Complainant has evidenced to be the registered owner of numerous trademarks relating to its company name and brand WHATSAPP, inter alia, but not limited to, the following:

- European Union Trade Mark No. 009986514 for WHATSAPP, registered on October 25, 2011;
- International Trademark Registration No. 1085539 for WHATSAPP, registered on May 24, 2011;
- United States Registration No. 3939463 for WHATSAPP, registered on April 5, 2011;
- Indian Trademark Registration No. 3111463 for WHATSAPP, registered on November 30, 2015.

The Complainant also operates the domain name <whatsapp.com>, registered on September 4, 2008, which resolves to the official website for its WhatsApp messaging platform.

The disputed domain name was registered on March 29, 2025.

According to the screenshots as shown in the Annex 10 of the Complaint and at the time of the Panel's visit to the disputed domain name, the disputed domain name resolves to a website promoting an alleged AI-powered bulk-messaging and chatbot service branded as "AI WhatsApp Bot". The website prominently features Complainant's WHATSAPP trademarks, including Complainant's chat-bubble design. The website advertises functionalities such as "bulk messaging efficiently while maintaining organization and compliance with WhatsApp guidelines", thereby directly invoking Complainant's platform and implying association with it.

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:

- the disputed domain name is confusingly similar to the Complainant's trademark;
- the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- the disputed domain name was registered and is being used in bad faith.

B. Respondent

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

6. Discussion and Findings

According to paragraph 15(a) of the Rules, the Panel shall decide the Complaint on the basis of the statements and documents submitted and in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

In accordance with paragraph 4(a) of the Policy, the Complainant must prove that each of the three following elements is satisfied:

- (i) the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights;
- (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.

Paragraph 4(a) of the Policy states that the Complainant bears the burden of proving that all these requirements are fulfilled, even if the Respondent has not replied to the Complainant's contentions. *Stanworth Development Limited v. E Net Marketing Ltd.*, WIPO Case No. [D2007-1228](#).

However, concerning the uncontested information provided by the Complainant, the Panel may, where relevant, accept the reasonable factual allegations provided in the Complaint as true. See section 4.3 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)").

For the evaluation of this case, the Panel has taken note of the [WIPO Overview 3.0](#) and, where appropriate, will decide consistently with the consensus views stated therein.

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 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 Panel finds that the entirety of the WHATSAPP 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, "AI" and "bot" 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.

In what concerns the addition of the generic Top-Level Domain ("gTLD") ".com" in relation to the disputed domain name, such is viewed as a standard registration requirement, and is 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.

In this regard, several circumstances support the Complainant’s prima facie showing:

- There is no evidence that the Respondent is commonly known by the disputed domain name. The underlying Whois information identifies the registrant as “Talentdwar technologies”, which bears no resemblance to the disputed domain name.
- The Respondent has neither acquired nor applied for any trademark corresponding to “AI WhatsApp BOT” or any variation thereof.
- The Respondent is not a licensee of the Complainant and has no affiliation, authorization, or relationship with the Complainant. Despite this, the Respondent’s website prominently displays the Complainant’s WHATSAPP trademarks as well as the chat bubble from the original WHATSAPP design mark, to achieve a similar look and feel.
- The Respondent has not demonstrated any rights or legitimate interests in the disputed domain name. As shown in Annex 10 of the Complaint, the Respondent uses the disputed domain name to operate a website offering purported bulk-messaging tools and an AI-powered chatbot branded as “AI WhatsApp Bot”, services that directly trade on the reputation of the Complainant’s WHATSAPP platform. The website prominently features Complainant’s trademarks and WHATSAPP design mark, including the use of a similar green color scheme and a chat-bubble device evocative of Complainant’s registered logo. Such use is clearly intended to create an impression of affiliation or endorsement. Prior UDRP panels have consistently held that respondents cannot establish rights or legitimate interests where the chosen domain name and associated content deliberately evoke a complainant’s well-known mark to promote unauthorized services. The Respondent’s unauthorized use of Complainant’s trademarks to market tools purporting to integrate with or modify the Whatsapp ecosystem cannot constitute a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy, nor does it amount to legitimate noncommercial or fair use.

Moreover, in accordance with the [WIPO Overview 3.0](#), section 2.5.1, where a domain name consists of a trademark plus an additional term (at the second or top-level), UDRP panels have largely held that such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. The fact that the Respondent has incorporated the Complainant’s WHATSAPP trademark in its entirety in the disputed domain name with the addition of the terms “AI” and “bot” to the Complainant’s WHATSAPP trademark, is further evidence, that the Respondent was well aware of the Complainant’s WHATSAPP trademark and business at the time of registration of the disputed domain name and has done so for the only purpose of creating an impression that the disputed domain name is connected with the Complainant’s WHATSAPP trademark.

The Respondent has provided no rebuttal or evidence of rights or legitimate interests. On the contrary, the record reflects clear targeting of the Complainant's WHATSAPP trademark and an intent to mislead Internet users for commercial gain.

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.

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

In the present case the Panel notes that the Complainant's WHATSAPP mark has become famous before the registration of the disputed domain name (see *WhatsApp Inc. v. Francisco Costa*, WIPO Case No. [D2015-0909](#)). The Respondent has replicated the well-known WHATSAPP mark in the disputed domain name. UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4.

The Panel considers that the composition of the disputed domain name, combined with the nature of the content to which it resolves, is clearly designed to mislead Internet users into believing that the Respondent's website, and the unauthorized "AI WhatsApp Bot" services promoted therein, are affiliated with, endorsed by, or otherwise connected to the Complainant. The website associated with the disputed domain name contains no disclaimer of any kind. Instead, it includes statements liable to reinforce the false impression of official association, such as: "AIWhatsappbot allows you to send bulk messages efficiently while maintaining organization and compliance with WhatsApp guidelines." By using the disputed domain name in this manner, the Respondent has intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of its website and the putative services offered on it, in accordance with paragraph 4(b)(iv) of the Policy.

Prior UDRP panels have consistently held that the use of domain names to distribute bulk-messaging or modified WhatsApp related software constitutes bad-faith targeting of the Complainant and its users. See, e.g., *WhatsApp LLC v. Bulk Whatsapp Software*, WIPO Case No. [D2021-0564](#); *WhatsApp Inc. v. Domain Data Guard / Hendro Wardoyo, Whatsapp Extra*, WIPO Case No. [D2019-1710](#).

In light of the above, the Panel notes that the trademark WHATSAPP has extensive presence over the Internet and is widely used and well known, being inconceivable that the Respondent did not have knowledge of this trademark at the time of registration of the disputed domain name. Furthermore, all cumulative circumstances of this case point to bad faith registration and use of the disputed domain name:

- (i) the disputed domain name incorporates the WHATSAPP mark in its entirety, adding terms that may refer to the Complainant's business and its app, which enhances the intrinsic likelihood of confusion and affiliation;
- (ii) the Complainant's trademark is well known;
- (iii) the Complainant operates widely including the country (India) where the Respondent is located;
- (iv) the Respondent used a privacy registration service;
- (v) the website that was linked to the disputed domain name targeted the Complainant and its app, including the WHATSAPP mark, the Complainant's logo in green color scheme and a chat-bubble device evocative of Complainant's registered logo mark;
- (vi) the Respondent did not reply to the Complaint, not offering any explanation of any rights or legitimate interests in the disputed domain name and not coming forward to deny the Complainant's assertions of bad faith.

Therefore, taking into consideration all cumulative facts and circumstances of this case, on the balance of probability, the Panel considers that the disputed domain name was registered and is being used in bad faith, with the intention of obtaining a free ride on the established reputation of the Complainant.

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 <aiwhatsappbot.com> be transferred to the Complainant.

/Gökhan Gökçe/

Gökhan Gökçe

Sole Panelist

Date: December 8, 2025