

ADMINISTRATIVE PANEL DECISION

VFS Global Services PLC v. Bogdan Timofeev, VFS Global
Case No. D2025-4429

1. The Parties

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

The Respondent is Bogdan Timofeev, VFS Global, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <vfs-help-line.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 October 28, 2025. On October 28, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 28, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

The Center verified that 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 25, 2025.

The Center appointed Dawn Osborne as the sole panelist in this matter on December 2, 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.

The Panel issued a Procedural Order on December 8, 2025 asking for evidence that the disputed domain name has been used in a fraudulent email scheme and for further details as to why the Complainant maintained that fake address details had been provided for the data registration details for the disputed domain name. On December 8, 2025, the Complainant confirmed that the address details given by the Respondent in the data registration details for the disputed domain name were, in fact, an address associated with the Complainant, but declined to provide evidence of the alleged fraudulent email scheme for data protection reasons.

4. Factual Background

The Complainant incorporated in 2010 is a United Kingdom company that is part of a large company group which has been providing administrative services in relation to visa applications for over 25 years.

The Complainant is the owner of numerous trade marks containing the VFS mark including:

Trade mark number T0400920A in Singapore for VFS (logo mark) for administrative services since April 25, 2005; and

Trade mark number 1555893 in India for VFS GLOBAL (logo mark) for administrative services since May 7, 2007.

The Complainant owns a number of domain names containing the Complainant's VFS mark including the domain name <vfshelpline.com> registered on September 3, 2007 which is used for the Complainant's helpline email addresses¹.

The disputed domain name registered on November 28, 2024 points to a holding page reproducing the disputed domain name in large text with a message at the bottom of the page indicating that the site is under construction. The Respondent has given false organization and address details for the data registration details for the disputed domain name using the Complainant's VFS GLOBAL mark and name and a physical address associated with the Complainant.

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 identical or confusingly similar to the Complainant's VFS trade marks containing the VFS mark in its entirety.

The Respondent is not commonly known by the disputed domain name and is not authorised by the Complainant.

Although it does not point to an active web site (which could be seen as passive holding which does not prevent a finding of bad faith) the disputed domain name has been used in a fraudulent email scheme to deceive customers that they are dealing with the Complainant. The Respondent has given the

¹ Noting the general powers of a panel articulated in paragraphs 10 and 12 of the Rules, it is commonly accepted that a panel may undertake limited factual research into matters of public record, as the Panel has done in this proceeding.

Complainant's mark and name VFS GLOBAL and a physical address associated with the Complainant as the data registration details for the disputed domain name. This is not a legitimate bona fide offering of goods or services or legitimate use. The Respondent adopted the disputed domain name and is using it in bad faith to confuse Internet users that the Respondent and its services are associated with the Complainant and to trade on the Complainant's goodwill in its VFS mark for commercial gain.

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

The Panel finds the Complainant's VFS mark is recognizable within the disputed domain name as the letters VFS are the distinctive and dominant part of the mark with the device element being a simple frame round the letters which are presented in a commonplace typeface. [WIPO Overview 3.0](#), section 1.10.

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 Respondent is not authorised by the Complainant and is not commonly known by the disputed domain name.

The disputed domain name does not point to an active site. While the Complainant claims that the disputed domain name has been used for a fraudulent email scheme it has declined to provide evidence of the same

to the Panel. However, the Respondent has given the Complainant's VFS GLOBAL mark and name and a physical address associated with the Complainant as data registration details for the disputed domain name which shows that the Respondent has knowledge of and is seeking to impersonate the Complainant and that the Respondent has provided false details for the data registration details of the disputed domain name. Further the disputed domain name appears to be intended to be a typosquatting registration differing only by two hyphens from the Complainant's domain name <vfshelpline.com> registered and used by the Complainant for email addresses.

Panels have held that the use of a domain name for illegal activity, here impersonation and fraud by way of providing false details for the disputed domain name registration details, can never confer rights or legitimate interests on a respondent. Further typosquatting is an indication of a lack of rights or legitimate interests. [WIPO Overview 3.0](#), section 2.13.1 and 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 Panel notes that the Respondent has provided false details in the data registration details for the disputed domain name which are, in fact, the Complainant's VFS GLOBAL name and mark and physical address details associated with the Complainant thereby fraudulently seeking to associate itself with the Complainant demonstrating that the Respondent has knowledge of and is targeting the Complainant by registration of the disputed domain name.

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.

Panels have found that the non-use of a domain name (including an under construction page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's trade mark, and the composition of the disputed domain name which appears to be a typosquatting registration intended to be similar to a domain name used by the Complainant for emails, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Panels have held that the use of a domain name for illegal activity, here impersonation and fraud, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. 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-help-line.com> be transferred to the Complainant.

/Dawn Osborne/

Dawn Osborne

Sole Panelist

Date: December 20, 2025