

ADMINISTRATIVE PANEL DECISION

ZipRecruiter, Inc. v. Mehedi Hasan, Gap TEE
Case No. D2025-4910

1. The Parties

The Complainant is ZipRecruiter, Inc., United States of America (“United States”), represented by SafeNames Ltd., United Kingdom.

The Respondent is Mehedi Hasan, Gap TEE, Bangladesh.

2. The Domain Name and Registrar

The disputed domain name <ziprecuiter.store> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 25, 2025. On November 26, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 26, 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 (Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 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 amended Complaint on November 28, 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 December 3, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 23, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on December 24, 2025.

The Center appointed Harini Narayanswamy as the sole panellist in this matter on December 30, 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 an online recruitment company based in the United States and was founded in 2010. The Complainant uses the trademark ZIPRECRUITER and operates its business from an online platform hosted from the domain name <ziprecruiter.com>. The Complainant uses several other country code Top-Level Domain (“ccTLD”) names for its business for serving different countries such as <ziprecruiter.co.uk>, <ziprecruiter.co.nz>, <ziprecruiter.us> and <ziprecruiter.fr>.

The Complainant owns a large portfolio of registered trademarks for the ZIPRECRUITER mark including:

- ZIPRECRUITER United States trademark number 3934310, registration date March 22, 2011, in class 42;
- ZIPRECRUITER European Union trademark number 015070873, registration date June 13, 2016, in classes 9, 36, 41, and 42; and
- ZIPRECRUITER United Kingdom trademark number UK00915070873, registration date June 13, 2016, in classes 9, 36, 41 and 42.

The Respondent registered the disputed domain name on October 9, 2025. The disputed domain name is parked, and the landing page contains pay-per-click (“PPC”) links some of which relate to the Complainant’s services. The disputed domain name also has active mail exchanger (“MX”) records.

The Complainant, through its representative, sent cease and desist notices to the Respondent on October 21, 2025, and October 28, 2025, and there was no response from the Respondent to these communications.

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 it is a leading online recruiter and attracts about 157 million global job seekers, 4.3 million employers and has over 40 million job alert email subscribers. Since its inception, the Complainant states that it served more than one million employers and 120 million job seekers. The Complainant states that its services are available in multiple countries and that it has offices in London, United Kingdom and Arizona, United States.

The Complainant contends that it has been recognized as one of the fastest growing technology companies in North America and was ranked 350 in Deloitte’s 2019 Technology Fast 500. It was also named on Fast Company’s 2019 list of “The World’s Most Innovative Companies” within the “Enterprise” sector. The Complainant states that it has been recipient of several G2 awards and has filed evidence supporting these submissions.

The Complainant states it has exclusive rights in the term “ZIPRECRUITER” and that it primarily operates from its website hosted from the domain name <ziprecruiter.com>. The website allows employers to post jobs and manage applications and job seekers can search for and receive job alerts, create candidate

profiles and access job opportunities. The Complainant states that its website has received an average of more than 30 million visitors per month between April 2025 and June 2025.

The Complainant contends that its mobile application is available on Google PlayStore and on the Apple Store which has been downloaded more than 10 million times on Google PlayStore. The Complainant states that it is active on social media, where it uses the ZIPRECRUITER mark to promote its products and services.

Notably, the Complainant argues that the disputed domain name is confusingly similar to the trademark. The Complainant further argues that the Respondent lacks rights or legitimate interests in the disputed domain name. The Complainant submits that the registration and the use of the disputed domain name is in bad faith.

B. Respondent

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

6. Discussion and Findings

Three elements that need to be established by the Complainant, in order to obtain the remedy of transfer of the disputed domain name under paragraph 4 (a) of the Policy are:

- (i) The disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) The Respondent lacks rights or legitimate interests in the disputed domain name; and
- (iii) The disputed domain name was registered and is being used in bad faith by the Respondent.

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 Panel finds the mark is recognizable within the disputed domain name. The disputed domain name differs from the mark by only one missing letter "r". The Complainant has argued that the omission of the letter "r" is a deliberate misspelling or typo squatting. A domain name which consists of a common misspelling of a trademark is considered to be confusingly similar to the trademark for purposes of the first element [WIPO Overview 3.0](#), section 1.9

Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. 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.

Paragraph 4 (c) of the Policy sets forth the following circumstances where a respondent may have rights or legitimate interests in the disputed domain name.

- (i) Before any notice to the respondent of the dispute, the use by the respondent or demonstrable preparations to use the domain name in connection with a bona fide offering of goods or services or
- (ii) The respondent, as an individual, business or other organization has been commonly known by the domain name, even if the respondent has acquired no trade mark or service mark rights or
- (iii) The respondent is making a legitimate noncommercial or fair use of the disputed domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

Having reviewed the available record, the Panel finds there is no evidence that the Respondent is commonly known by the disputed domain name or a name that corresponds to the disputed domain name. The parked page to which the disputed domain name resolves, has PPC links such as “Work for Snap Chat from Home” and “Most Popular Job Search Engines”. The Complainant has argued that the use of the domain name which consists of a misspelling of the Complainant’s mark to host PPC links on a parked page, particularly links to sites which compete with the Complainant’s business, does not represent a bona fide offering of goods.

Panels have consistently held that the use of a disputed domain name for posting PPC links is not bona fide use where such links compete with or capitalize on the reputation and goodwill of the complainant’s mark or otherwise mislead Internet users. [WIPO Overview 3.0](#), section 2.9.

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 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.

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 Complainant has established in these proceedings that its mark has been extensively used for more than fourteen years prior to the registration of the disputed domain name. The Panel also notes that the reputation of the Complainant’s mark has been recognized in previous UDRP cases, some of which are:

- *ZipRecruiter, Inc. v. Tochukwu Ogbuzuo*, WIPO Case No. [D2025-1003](#);
- *ZipRecruiter, Inc. v. Samir Shah, Bona Inc*, WIPO Case No. [D2025-0571](#); and
- *ZipRecruiter, Inc. v. Privacy service provided by Withheld for Privacy ehf / Carolina Rodrigues*, WIPO Case No. [D2021-2184](#).

The Panel notes that the mark as combined is a fanciful mark. Under these circumstances, noting the composition of the disputed domain name, it is reasonable to assume that the Respondent ought to have known of the mark when the disputed domain name was registered.

The Panel notes that the Respondent has set up active MX records, which could be used for illegitimate activities such as phishing.

The Panel finds that the misspelling of the Complainant's trademark in the disputed domain name signals an intention on the part of the Respondent to confuse users into believing that the website operated using the disputed domain name is either associated or endorsed by the trademark owner. The Panel finds, for the reasons discussed, that the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

The Panel is satisfied that the overall circumstances of the case indicate that the disputed domain name was registered in bad faith and is being used in bad faith. 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 <ziprecuiter.store> be transferred to the Complainant.

/Harini Narayanswamy/

Harini Narayanswamy

Sole Panelist

Date: January 13, 2026