

ADMINISTRATIVE PANEL DECISION

WhatsApp LLC v. Hamza Jawad, Business
Case No. D2025-5015

1. The Parties

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

Respondent is Hamza Jawad, Business, Pakistan.

2. The Domain Name and Registrar

The disputed domain name <gbwhatsapp.pro> is registered with Name.com, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 2, 2025. On December 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 4, 2025, the Registrar transmitted by email to the Center its verification response confirming that 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 Respondent of the Complaint, and the proceedings commenced on December 9, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 29, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on December 30, 2025.

The Center appointed Stephanie G. Hartung as the sole panelist in this matter on January 7, 2026. 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

Complainant is a company established under the laws of the United States, which operates the well-known "WhatsApp" messaging and voice over IP service and mobile application.

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:

- word trademark WHATSAPP, United States Patent and Trademark Office (USPTO), registration number: 3,939,463, registration date: April 5, 2011, status: active;
- word trademark WHATSAPP, European Union Intellectual Property Office (EUIPO), registration number: 009986514, registration date: October 25, 2011, status: active;
- word trademark WHATSAPP, Intellectual Property India, registration number: 3111463, registration date: November 30, 2015, status: active.

Moreover, Complainant has demonstrated to own numerous domain names relating to its WHATSAPP trademark, inter alia, since 2008 the domain name <whatsapp.com>, which resolves to Complainant's main website at "www.whatsapp.com", used to promote and offer Complainant's various services in the mobile application industry.

Respondent, according to the Registrar verification for the disputed domain name, is located in Pakistan. The disputed domain name was registered on June 24, 2025. It resolves to a website at "www.gbwhatsapp.pro" which offers for download an application called "GBWhatsApp Pro", whilst making prominent use of Complainant's WHATSAPP trademark and official logo, absent any imprint or other contact information.

In June and July 2025, Complainant's legal representatives sent to Respondent, through the email point of contact provided through the Whois information for the disputed domain name, notifications demanding that Respondent ceases all unauthorized use of Complainant's WHATSAPP trademark and transfer the disputed domain name to Complainant, which remained unanswered.

Complainant requests that the disputed domain name be transferred to Complainant.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name. Notably, Complainant contends to be a global leader in messaging services for mobile devices and one of the fastest growing and most popular mobile applications in the world, with well over 2 billion monthly active users in over 180 countries now using "WhatsApp". Consequently, since its launch in 2009, the WHATSAPP trademark has acquired considerable reputation and goodwill worldwide.

Complainant submits that the disputed domain name is confusingly similar to Complainant's WHATSAPP trademark, as it wholly incorporates the latter, only adding the non-distinctive term "gb" and including a typographical variant of said trademark by replacing the single letter "t" with a double letter "tt" which constitutes a deliberate misspelling. Moreover, Complainant asserts that Respondent has no rights or legitimate interests in respect of the disputed domain name since (1) to the best of Complainant's knowledge, Respondent has neither acquired nor applied for a trademark registration for GBWHATSAPP, and there is no reason to suggest that Respondent is commonly known by the disputed domain name, (2) Respondent is not a licensee of Complainant, is not affiliated with Complainant in any way, and has not been authorized by Complainant to make any use of Complainant's WHATSAPP trademark, in a domain name or otherwise, (3) Respondent has configured the disputed domain name to lead to content that specifically targets Complainant by offering an unauthorized, purportedly modified version of Complainant's application,

whilst making prominent use of Complainant's WHATSAPP trademark and official logo, (4) all these elements are likely to confuse users into believing that the disputed domain name and Respondent's purported "GBWhatsapp" services are operated by, approved of, or affiliated with Complainant, which cannot constitute legitimate or noncommercial fair use under the Policy, and (5) even if one was to apply the "Oki data" criteria for bona fide service providers, Respondent's website fails e.g. to accurately and prominently disclose its lack of relationship with Complainant despite repeatedly making prominent use of Complainant's WHATSAPP trademark.

Finally, Complainant argues that Respondent has registered and is using the disputed domain name in bad faith since (1) Complainant's WHATSAPP trademark is inherently distinctive and well-known throughout the world (including in Pakistan) in connection with its messaging application since 2009, having been continuously and extensively used since the respective launching of its services, and acquiring considerable reputation and goodwill worldwide, (2) the disputed domain name and Respondent's website content are so obviously connected with Complainant and its WHATSAPP trademark and services that such use by Respondent, which has no connection to Complainant, suggests opportunistic bad faith, (3) by using the disputed domain name in this fashion, Respondent has intentionally attempted to attract Internet users to its website by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of Respondent's website and putative services marketed therein, and (4) Respondent's modified unauthorized application promoted via the disputed domain name may be used to spread malware, to enable spam, to harvest personal data from Complainant's platform, to steal users' account credentials, or for other illegal activities.

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, Complainant carries the burden of proving

- (i) that the disputed domain name is identical or confusingly similar to a trademark or service mark in which Complainant has rights; and
- (ii) that Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) that the disputed domain name has been registered and is being used in bad faith.

Respondent's default in the case at hand does not automatically result in a decision in favor of Complainant, however, paragraph 5(f) of the Rules provides that if Respondent does not submit a response, in the absence of exceptional circumstances, the Panel shall decide the dispute solely based upon the Complaint. Further, according to paragraph 14(b) of the Rules, the Panel may draw such inferences from Respondent's failure to submit a response as it considers appropriate.

A. Identical or Confusingly Similar

First, 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 Complainant's WHATSAPP 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.

Complainant has shown rights in respect of its WHATSAPP trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. Also, the entirety of such trademark is reproduced within the disputed domain name, simply in a misspelled version by doubling the letter "t". Accordingly, the disputed domain name is confusingly similar to Complainant's WHATSAPP trademark for the purposes of the Policy, as the latter is still recognizable within the disputed domain name. [WIPO Overview 3.0](#), section 1.7. Moreover, although the addition of other terms (here, the prefix "gb") may bear on assessment of the second and third elements,

in the case at hand the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and Complainant's WHATSAPP trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Panel, therefore, holds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Second, paragraph 4(c) of the Policy provides a list of circumstances in which 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 Complainant has established a *prima facie* case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted 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 particular, Respondent has not been authorized to use Complainant's undisputedly well-known WHATSAPP trademark, either as a domain name or in any other way. Also, there is no reason to believe that Respondent's name somehow corresponds with the disputed domain name; and Respondent does not appear to have any trademark rights associated with the terms "gbwhatsapp" and/or "whatsapp" on its own. To the contrary, the disputed domain name resolves to a website at "www.gbwhatsapp.pro" which offers for download an application called "GBWhatsapp Pro", whilst making prominent use of Complainant's WHATSAPP trademark and official logo; this website apparently does not contain any disclaimer informing Internet users of the non-existing (business) relationship between Respondent and Complainant, e.g. that the website is not operated by or affiliated with Complainant. Such making use of the disputed domain name, therefore, neither qualifies as *bona fide* offering of services nor as legitimate noncommercial or fair use within the meaning of the Policy, not even so under the so-called Oki Data principles which would indeed have required Respondent, e.g. to accurately and prominently disclose on such website the nonexistent relationship between Respondent and Complainant as the WHATSAPP trademark holder, which Respondent obviously did not. [WIPO Overview 3.0](#), section 2.8.

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

C. Registered and Used in Bad Faith

Third, 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.

The circumstances of this case leave no doubt that Respondent was fully aware of Complainant's rights in its undisputedly well-known WHATSAPP trademark when registering the disputed domain name and that the latter is clearly directed thereto. Moreover, using the disputed domain name, which is at least confusingly similar to Complainant's WHATSAPP trademark and obviously includes an intentional misspelling thereof, to run a website at "www.gbwhatsapp.pro" which offers for download an application called "GBWhatsapp Pro",

whilst making prominent use of Complainant's WHATSAPP trademark and official logo, absent any imprint or other contact information, is a clear indication that Respondent intentionally attempted to attract, for commercial gain, Internet users to its own website by creating a likelihood of confusion with Complainant's WHATSAPP trademark as to the source, sponsorship, affiliation or endorsement of Respondent's website. Such circumstances are evidence of registration and use of the disputed domain name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

The Panel, therefore, holds that 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, <gbwhatsapp.pro>, be transferred to Complainant.

/Stephanie G. Hartung/

Stephanie G. Hartung

Sole Panelist

Date: January 21, 2026