

## **ADMINISTRATIVE PANEL DECISION**

Zoho Corporation Private Limited v. feng xiao  
Case No. D2026-0577

### **1. The Parties**

The Complainant is Zoho Corporation Private Limited, India, represented by Abion GmbH, Switzerland.

The Respondent is feng xiao, China.

### **2. The Domain Name and Registrar**

The disputed domain name <cn-zoho.com> is registered with NameSilo, LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 11, 2026. On February 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 12, 2026, 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 (User #3cccffbf Privacy, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 13, 2026, 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 the same day.

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 February 20, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 12, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 16, 2026.

The Center appointed Willem J. H. Leppink as the sole panelist in this matter on March 19, 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**

The following facts are undisputed.

The Complainant is a technology company with over 130 million users around the world, providing global cloud-based software offering products and solutions. Its products include private cloud systems, sales, marketing, finance, Human Resources, legal, security and IT management, Business Intelligence (BI) and analytics, project management and developer platforms. The Complainant was founded in 1996 as AdventNet, Inc. In 2004, it launched its first software under the Zoho brand, “Zoho Virtual Office”. In 2009, AdventNet, Inc. was renamed to its current name.

The Complainant has more than 18,000 employees working in more than 30 offices across 24 different jurisdictions, including Germany, India, the Netherlands, Singapore, the United Kingdom, the United States of America and China, where the Complainant has established a significant local presence to support Chinese customers and operations. In China, the Complainant operates a dedicated office in Beijing’s Haidian district, providing sales, support, and localized services directly to enterprises in the region.

The Complainant also maintains a localized website, accessible through <zoho.com.cn>, and has invested in local infrastructure — including data centers — to improve performance and compliance for users in the Chinese market. The Complainant also provides cloud-based accounting software and financial management services commonly referred to as “Zoho Books” since 2011, which form an integral part of the Complainant’s comprehensive business software ecosystem. Zoho Books facilitates the creation and management of invoices, bills, expenses, bank reconciliations, tax compliance records, financial reports, and other critical accounting data.

The Complainant owns various trademark registrations which consist of or contain the word element ZOHO worldwide, including the International Registration for the word mark ZOHO, registration number 929558 with a registration date of June 19, 2007, for services in class 42, designating a large number of countries worldwide and the Chinese trademark registration for the combined word / device mark ZOHO, with registration number 17690899, with a registration date of October 14, 2018 for services in class 42.

The disputed domain name was registered on March 26, 2025 and at the time of filing the Complaint resolves to a website referencing the ZOHO BOOKS app and depicting a logo identical to the Chinese trademark registration 17690899.

#### **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 the following.

The Complainant and its products and services enjoy a high degree of renown around the world.

The disputed domain name incorporates the Complainant’s trademark ZOHO preceded by the geographical term “cn”, separated by a hyphen. The geographical term “cn” corresponds to the country code for China, a country where the Complainant has an active business presence. The Complainant owns <zoho.com.cn>.

The website to which the disputed domain name resolves, presents itself as promoting Zoho Books—related products and services, including an app, and prominently references “Zoho Books Download” and “Zoho Books APP (iOS).” It describes Zoho Books as cloud-based accounting software for managing invoices, expenses, inventory, and financial reporting—services offered by the Complainant.

The site contains multiple sections with active links leading to articles about Zoho Books products, particularly inventory management. These articles use promotional headings emphasizing easy or convenient downloads and data management benefits. Within the articles, numerous links invite users to download Zoho Books software (e.g., PC download links or inventory management software downloads), but these links redirect to inactive or failed download pages accompanied by warnings.

The Respondent has been hiding its identity.

Given the use of the combined word / device mark ZOHO it is inconceivable that the Respondent registered the disputed domain name without prior knowledge of the Complainant and its trademark.

The Respondent appears to have a pattern of abusive domain name registrations targeting third-party trademarks. A reverse Whois search shows that the Respondent has registered multiple domain names incorporating the well-known WHATSAPP trademark (e.g. <whatcsaspp.com>, <whateaspp.com>, <whatosaspp.com>). This demonstrates a pattern of conduct involving the registration of domain names that infringe on the trademarks of other brand owners.

## **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 trademark and the disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the mark ZOHO 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 3.1](#), section 1.7.

Although the addition of other terms here, “cn”, 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 3.1](#), 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 that 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 3.1](#), 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.

To the contrary, the Respondent, through the website to which the disputed domain name resolves and where the logo of the Complainant has been used, has attempted to impersonate the Complainant. Panels have held that the use of a domain name for illegitimate activity here, as claimed impersonation, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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

### **C. Registered and Used in Bad Faith**

The Panel refers to its considerations under Section 6.B.

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 intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant’s mark. The Panel finds that the Respondent clearly targeted the Complainant and its trademark when registering and using the disputed domain name. Panels have held that the use of a domain name for illegitimate activity here, as claimed impersonation, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, also taking into account that the Respondent is engaged in a pattern of bad faith conducts, 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 <cn-zoho.com> be transferred to the Complainant.

*/Willem J. H. Leppink/*

**Willem J. H. Leppink**

Sole Panelist

Date: March 26, 2026