

ADMINISTRATIVE PANEL DECISION

WhatsApp, LLC v. Md Farhaz
Case No. D2026-1639

1. The Parties

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

The Respondent is Md Farhaz, India.

2. The Domain Name and Registrar

The disputed domain name <watsappkaro.space> is registered with Hostinger Operations, UAB (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 16, 2026. On April 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 20, 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 (Domain Admin, Privacy Protect, LLC (PrivacyProtect.org)) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 20, 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 amendment to the Complaint on April 21, 2026.

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 April 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 13, 2026.

On April 20, 2026, the Respondent sent an email communication to the Center stating that it had ceased use of the disputed domain name, had taken down the associated website, did not intend to use the disputed domain name in the future, and would be willing to transfer the disputed domain name to the Complainant. The Respondent sent further email communications to the Center on April 21 and 23, 2026. These communications do not constitute a formal response.

Following the Respondent's communication, the Complainant informed the Center that it did not wish to suspend the proceeding and requested that the proceeding continue. On May 15, 2026, the Center informed the Parties that it would commence the panel appointment process.

The Center appointed Kiyoshi Tsuru as the sole panelist in this matter on May 21, 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 Complainant operates the WhatsApp messaging and voice-over-IP platform and mobile application. The Complainant's services allow users to send text and voice messages, make voice and video calls, and share multimedia content. The Complainant also operates "WhatsApp Business" and "WhatsApp Business Platform", services directed to businesses wishing to communicate with customers through the WhatsApp ecosystem.

The Complainant has used the WHATSAPP trademark since 2009 and owns numerous trademark registrations for the WHATSAPP mark in multiple jurisdictions worldwide, some of them predating the registration of the disputed domain name, including the following:

Jurisdiction	Reg. No.	Trademark	Registration Date	Class(es)
United States of America	3939463	WHATSAPP	April 5, 2011	42
European Union	009986514	WHATSAPP	October 25, 2011	9, 38, 42
European Union	010496602		May 18, 2012	9, 38, 42

The Complainant has also established online presence through its official website at "www.whatsapp.com" and through social media platforms including Facebook, Instagram, X, YouTube, and LinkedIn.

The disputed domain name was registered on June 17, 2025.

The disputed domain name resolved to a website offering services related to the WhatsApp Business API and bulk messaging services under the name "WatsAppKaro". The website displayed references to the Complainant's WHATSAPP trademark and incorporated design elements similar to those used by the Complainant.

The Respondent's website displayed a logo and color scheme similar to the Complainant's branding and displayed content suggesting an association with the Complainant and its services. Currently, the disputed domain name resolves to an inactive website.

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:

I. Identical or confusingly similar

That it holds numerous registrations for the WHATSAPP trademark and has established rights in said mark for purposes of the Policy.

That the disputed domain name is confusingly similar to its WHATSAPP trademark because it incorporates a misspelling of the mark, omitting the letter "h", followed by the term "karo", which constitutes a classic case of typosquatting.

That the addition of the term "karo" does not prevent a finding of confusing similarity, as the WHATSAPP trademark remains clearly recognizable within the disputed domain name. That the generic Top-Level Domain ("gTLD") ".space" should be disregarded for purposes of the first element analysis.

That the disputed domain name is confusingly similar to the WHATSAPP trademark under paragraph 4(a)(i) of the Policy.

II. Rights or Legitimate Interests

That the Respondent has no rights or legitimate interests in the disputed domain name under paragraph 4(a)(ii) of the Policy.

That the Respondent is not affiliated with or authorized by the Complainant, is not commonly known by the disputed domain name, and does not hold any corresponding trademark rights.

That the disputed domain name has been used to resolve to a website offering services related to the WhatsApp Business API while making use of the Complainant's WHATSAPP trademarks and branding, thereby suggesting an association with the Complainant. That such use does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain name under the Policy.

That the Respondent lacks rights or legitimate interests in the disputed domain name.

III. Registered and Used in Bad Faith

That the Respondent registered and used the disputed domain name in bad faith to intentionally attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's WHATSAPP trademark, including through the unauthorized offering of purported WhatsApp-related business and API services.

That the Respondent falsely represented itself as a Meta Business Partner, failed to respond to the Complainant's cease-and-desist communications, and used a privacy service in connection with the registration of the disputed domain name.

B. Respondent

The Respondent did not submit a formal Response to the Complaint.

In email communications sent by the Respondent to the Center dated April 20, April 21 and April 23, 2026, the Respondent stated that it had ceased use of the disputed domain name, had taken down the associated website, and did not intend to use the disputed domain name in the future. The Respondent also expressed a willingness to cooperate regarding the transfer of the disputed domain name. However, such communications do not constitute a formal Response within the meaning of the Policy and the Rules.

The Respondent did not otherwise address the Complainant's contentions comprised in the Complaint, under paragraph 4(a) of the Policy.

6. Discussion and Findings

Paragraph 4(a) of the Policy sets out the three requirements that the complainants must prove in order to successfully request remedies:

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

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, as it has demonstrated rights in the WHATSAPP trademark through its trademark registrations shown in the records.

The disputed domain name <watsappkaro.space> incorporates a misspelled version of the Complainant's WHATSAPP trademark, differing only by the omission of the letter "h" following the initial "w". The Panel notes that the trademark remains recognizable within the disputed domain name notwithstanding this minor alteration.

As recognized in section 1.9 of the [WIPO Overview 3.1](#), a domain name consisting of a common, obvious, or intentional misspelling of a trademark is typically considered confusingly similar to the relevant mark for purposes of the first element. The omission of a single letter in the present case constitutes a typical case of typosquatting.

Previous panels appointed under the Policy have consistently found that domain names incorporating typographical variations of the WHATSAPP trademark are confusingly similar to the Complainant's mark. See, e.g., *WhatsApp LLC v. Assem Mahgoob, Assem*, WIPO Case No. [D2025-1776](#) (<gbwatsap.com>), where the panel found that the omission of letters from the WHATSAPP trademark constituted a typical example of typosquatting and that said fact did not prevent a finding of confusing similarity.

Although the addition of the word "karo" 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.

In addition, the gTLD “.space” is generally disregarded for purposes of the comparison under the first element.

Accordingly, the Complainant has satisfied paragraph 4(a)(i) of the Policy.

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.

The Panel notes that the disputed domain name consists of a misspelled version of the Complainant’s WHATSAPP trademark combined with an additional term related to the services promoted on the associated website. In the circumstances of this case, such composition carries a risk of confusion.

The Panel further notes that the website did not accurately and prominently disclose the absence of any relationship with the Complainant. Rather, the record indicates that the website presented itself in a manner suggesting an association with the Complainant and its services.

The Respondent has failed to bring forward evidence of any circumstances that could support rights or legitimate interests in the disputed domain name within the meaning of paragraph 4(c) of the Policy. Panels have further recognized that the use of a domain name for impersonation, passing off, or other misleading conduct cannot confer rights or legitimate interests on a respondent. See [WIPO Overview 3.1](#), section 2.13.1; *WhatsApp LLC v. Sahaji, Blogging Mafia*, WIPO Case No. [DCC2024-0032](#); and *WhatsApp LLC v. Mytoolz net*, WIPO Case No. [DIO2024-0035](#).

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in respect of the disputed domain name.

The Panel has considered the Respondent’s email communication of April 20, 2026. However, that communication does not address the circumstances contemplated by paragraph 4(c) of the Policy and does not provide a basis upon which rights or legitimate interests in the disputed domain name could be found.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances that may constitute evidence of the registration and use of a domain name in bad faith.

The disputed domain name incorporates a misspelled version of the Complainant's WHATSAPP trademark and was used to resolve to a website offering services relating to the WhatsApp Business API and WhatsApp-based business communications. The record further shows that said website displayed references to "Meta Business Partner" and was presented in a manner suggesting an association with the Complainant and its services.

Given the composition of the disputed domain name and the content of the website to which it resolved, the Panel finds that the Respondent was aware of the Complainant and its WHATSAPP trademark when registering the disputed domain name. The Respondent has not provided any evidence demonstrating authorization from the Complainant or participation in the Meta Business Partner program.

The Panel further notes that the Respondent did not substantively reply to the Complainant's cease-and-desist communications. Although such failure is not in itself determinative, it reinforces the inference that the Respondent was aware of the Complainant and its trademark rights and elected to continue its conduct until the time when the Complaint was filed.

In the circumstances of this case, the Panel finds that the Respondent intentionally attempted to attract Internet users to its website for commercial gain by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of the website to which the disputed domain name resolved and the services offered through it, which conduct falls under the meaning of paragraph 4(b)(iv) of the Policy.

The typosquatting conduct carried out by the Respondent further supports a finding of bad faith. As noted in section 3.1.4 of the [WIPO Overview 3.1](#), the nature of a domain name consisting of a common or intentional misspelling of a well-known trademark may itself support an inference of bad faith. See also *WhatsApp LLC v. Assem Mahgoob, Assem*, WIPO Case No. [D2025-1776](#).

The Panel has also considered the Respondent's April 20, 2026, communication indicating that it had ceased use of the disputed domain name and taken down the associated website. However, such communication does not alter the Panel's assessment of the Respondent's prior registration and use of the disputed domain name as evidenced in the record. Moreover, the subsequent inactivity of the disputed domain name does not preclude a finding of bad faith. As noted in section 3.3 of the [WIPO Overview 3.1](#), in light of the totality of the circumstances, the non-use of a domain name, including a blank or inactive page, does not by itself prevent a finding of bad faith under the doctrine of passive holding.

In light of the foregoing circumstances, the Panel finds that the disputed domain name was registered and is being used in bad faith within the meaning of paragraph 4(a)(iii) 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 <watsappkaro.space> be transferred to the Complainant.

/Kiyoshi Tsuru/

Kiyoshi Tsuru

Sole Panelist

Date: June 4, 2026