

ADMINISTRATIVE PANEL DECISION

VFS Global Services PLC v. Adrian, Max
Case No. D2026-2151

1. The Parties

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

The Respondent is Adrian, Max, Belgium.

2. The Domain Name and Registrar

The disputed domain name <vfsglobalnetwork.com> is registered with PDR Ltd. d/b/a PublicDomainRegistry.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 19, 2026. On May 19, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 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 (Not Available) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 26, 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 May 26, 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 June 1, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 21, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 23, 2026.

The Center appointed Fabrizio Bedarida as the sole panelist in this matter on June 29, 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 in these administrative proceedings is VFS Global Services PLC, a company incorporated in the United Kingdom on September 28, 2010. The Complainant is a specialist in providing administrative and non-judgmental tasks related to visa application for its client embassies and diplomatic missions, ranging from the distribution of visa application forms, accepting visa applications at its Visa Applications Centers, forwarding the visa applications to the concerned embassy or diplomatic mission and handling the return of processed applications, and other related services. The Complainant and its group companies serve the interests of the diplomatic missions of 69 sovereign governments in 165 countries across 5 continents worldwide.

The Complainant has implemented privacy protection control systems designed to ensure the highest security standards and confidentiality. The whole system is now online and linked through the Complainant's website, "www.vfsglobal.com". This website provides country-specific visa information, including visa requirements, application procedures, fee structures, and interview scheduling. The website is accessed by millions of people every day who seek visas (of various categories and purposes) for the United States of America, United Kingdom, Canada, United Arab Emirates (the), Nigeria, Brazil and many other countries, as the Complainant is exclusively authorized by the Governments of these countries through their respective embassies.

The Complainant owns numerous trademark registrations in various jurisdictions for the VFS and VFS GLOBAL trademarks.

The Complainant is, inter alia, the owner of:

Singapore Trademark Registration number T0400920A for VFS (device), registered on April 25, 2025;

United Arab Emirates (the) Trademark Registration number 304263 for VFS.GLOBAL (device), registered on May 16, 2019; and

European Union Trademark Registration number 006923569 for VFS GLOBAL (device), registered on June 29, 2009.

The Complainant is also the registrant of the disputed domain name <vfsglobal.com>, which was registered on February 23, 2005 by one of the Complainant's group companies, VF Worldwide Holdings Limited.

Previous UDRP panels found that the Complainant had "acquired goodwill and a widespread reputation in the VFS trademarks, in relation to visa processing services" (e.g. *VFS Global Services PLC. v. Ajay Kumar*, WIPO Case No. [D2022-4378](#), and *VFS Global Services PLC. v. Vianne A. Ahura*, WIPO Case No. [D2024-1560](#)).

The disputed domain name was registered on April 28, 2026.

The disputed domain name is inactive. However, the Complainant asserts that the disputed domain name has been used to send emails to commit fraud by impersonating 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 essential and significant part of the disputed domain name is "vfsglobal" which is identical and/or confusingly and deceptively similar to the Complainant's trademarks and to the Complainant's domain name <vfsglobal.com>. According to the Complainant, even the most attentive or cautious user can get confused due to the presence of the term "vfsglobal" in the disputed domain name, especially when used in regard to visa-related information and activities.

The Complainant also submits that in light of its extensive worldwide reputation through the trademarks/trade names VFS / VFS GLOBAL, the Respondent must have known about the Complainant's rights on the trademarks VFS / VFS GLOBAL and its services at the time of registering the disputed domain name.

The Complainant further states that it has come to the Complainant's attention that the website operating at the disputed domain name is being actively used in bad faith, with the clear intention of impersonating the Complainant and misleading members of the public into inferring an association with the Complainant.

Although the website does not host any active content and remains inaccessible, the Respondent has deliberately activated and used email services associated with the disputed domain name to carry out fraudulent and deceptive activities, falsely portraying itself as the Complainant.

The Respondent has been using the disputed domain name to send fraudulent emails to unsuspecting victims while falsely representing itself as being associated with the Complainant.

The Respondent has used the disputed domain infrastructure solely as a tool for phishing, impersonation and fraud, with the intention of deceiving recipients into believing that such communications originate from, or are endorsed and authorized by, the Complainant.

The Complainant further states that "this fraudulent conduct on the part of the Respondent has already resulted in actual consumer confusion and deception. One such victim approached the Complainant seeking confirmation regarding the authenticity and legitimacy of the fraudulent communications received from the Respondent".

The details provided by the Respondent while registering the disputed domain name are fake and were given purely for the purposes of fulfilling the data requirements.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy lists three elements which a complainant must satisfy in order to succeed. The

Complainant must satisfy that:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;

- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the domain name has been registered and is being used in bad faith.

Under paragraph 14(b) of the Rules, the Panel shall draw such inferences from the Respondent's default as

the Panel considers appropriate. Nevertheless, the Panel may rule in the Complainant's favor only after the

Complainant has proven that the above elements are present.

The Panel notes that the Complainant has alleged fraudulent email use, but it has not provided supporting evidence, and such evidence would ordinarily have been expected.

Therefore, in these circumstances, and noting that the applicable standard is the balance of probabilities, the Panel, taking note on the one hand of the above lack of evidence regarding the fraudulent email use, and on the other hand of the fact that the Respondent did not deny the Complainant's claims, will proceed to a decision based on the existing record.

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 textual element of the Complainant's VFS and VFS GLOBAL marks is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Further, the Panel finds the VFS and VFS GLOBAL marks are recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms here, "network", 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.

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 3.1](#), section 3.2.1.

Owing to the Complainants' reputation, the nature of the disputed domain name, which incorporates both of the Complainant's VFS and VFS GLOBAL trademarks, and is also similar to the Complainant's domain name <vfsglobal.com>, it is reasonable to infer that the Respondent registered the disputed domain name with full knowledge of the Complainants' trademarks, and so the Panel finds on the balance of probabilities that the Respondent was aware of the Complainants' trademarks when registering the disputed domain name.

Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a well-known trademark, and particularly in the case of coined or fanciful marks, can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4. In this case, the disputed domain name is confusingly similar to the Complainant's renowned VFS and VFS GLOBAL trademarks, and also similar to the Complainant's domain name <vfsglobal.com>, and was registered by the Respondent who has no relationship with the Complainant, thereby giving rise to a presumption of bad faith.

The Panel further notes the Complainant's assertions and concerns that the disputed domain name may be used for phishing. In this regard, the fact that the disputed domain name is also similar to the Complainant's domain name <vfsglobal.com>, supports the inference that the Respondent intended to take unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant as to the origin or affiliation of the website at the disputed domain name.

The disputed domain name is currently inactive, which, coupled with the composition of the disputed domain name, the provision of an incorrect, if not outright fake, address, when registering the disputed domain name, leads the Panel to conclude that the Respondent registered the disputed domain name due to its confusing similarity with the Complainant's trademarks in order to intentionally capitalize on the Complainant's trademarks.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. Having

reviewed the available record, the Panel notes the reputation of the Complainant's trademark, the composition of the disputed domain name, and the lack of response, 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.

Finally, the Panel notes that the Respondent's failure to respond to the Complainants' assertions made in these proceedings further supports a finding of bad faith registration and use of the disputed domain name.

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 <vfsglobalnetwork.com> be transferred to the Complainant.

/Fabrizio Bedarida/

Fabrizio Bedarida

Sole Panelist

Date: July 13, 2026