ADMINISTRATIVE PANEL DECISION

Zoho Corporation Private Limited v. Danny Ellis
Case No. D2026-2220

1. The Parties

The Complainant is Zoho Corporation Private Limited, India, represented by Abion AB, Sweden.

The Respondent is Danny Ellis, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <senderzohoinvoice.com> is registered with Wix.com Ltd. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 22, 2026. On May 22, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 3, 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 (Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 3, 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 June 4, 2026.

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 June 5, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 25, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 30, 2026.

The Center appointed José Ignacio San Martín Santamaría as the sole panelist in this matter on July 3, 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 is a leading technology company with over 130 million users around the world that provides global cloud-based software.

The Complainant is the owner of multiple trademark registrations for ZOHO in different jurisdictions, among them:

- International Trademark Registration. No. 929558 ZOHO, registered on June 19, 2007, for services in class 42.

- International Trademark Registration. No. 1841998 ZOHO (figurative), registered on October 16, 2024, for products and services in classes 9 and 42.

- European Union Trademark Registration. No. 018721836 ZOHO, filed on June 24, 2022, and registered on November 2, 2022, for products in class 9.

- United States trademark Registration. No. 3260807 ZOHO, filed on August 9, 2006, and registered on July 10, 2007, for services in class 42.

The disputed domain name was registered on March 10, 2026, and resolves to a Registrar parking page.

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 Complainant is a leading technology company. Over the years, Zoho has received numerous industry awards and recognitions.

- The Complainant also provides cloud-based business and financial software solutions under the names "Zoho Invoice", "Zoho Billing", and "Zoho Payroll", which form an integral part of the Complainant's software ecosystem.

- The Complainant is the owner of multiple trademark registrations for ZOHO in different jurisdictions, including the ones mentioned above.

- The disputed domain name incorporates the Complainant's registered trademark ZOHO preceded by the term "sender" and followed by the relevant term "invoice". The ZOHO trademark is clearly recognizable in the disputed domain name.

- The Respondent has no rights or legitimate interests in the disputed domain name. The Complainant and the Respondent have never had any previous relationships, nor has the Complainant ever granted the Respondent any rights to use the Complainant's trademark ZOHO, including in the disputed domain name.

- The Complainant is the owner of the domain name <zohoinvoice.com> which was registered in 2007 and is used to redirect to their official website and the subsection "www.zoho.com/invoice" where it informs customers of their product "Zoho Invoice".

- The disputed domain name was registered and is being used in bad faith. The Respondent registered the disputed domain name to attract Internet users to the associated website and create a likelihood of confusion with the Complainant and its ZOHO trademark in Internet users' mind.

- The contact details disclosed in the Notice of Registrant Information appear to be inaccurate, inconsistent, or potentially fabricated.

- The disputed domain name is passively held. There is no evidence of any actual or contemplated good-faith use of the Disputed Domain Name. The ZOHO trademark is widely known in the field. Moreover, the disputed domain name incorporates the Complainant's trademark ZOHO entirely, as well as the relevant terms "sender" and "invoice".

- It follows that, on the balance of probabilities, there is no plausible good faith use to which the disputed domain name may be put. In view of the circumstances, the Complainant registered and used the disputed domain name in bad faith and its conduct falls within the meaning of Paragraph 4(a)(iii) of the Policy.

As a consequence, the Complainant requests that the disputed domain name be transferred to the Complainant.

B. Respondent

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

6. Discussion and Findings

Pursuant to paragraph 4(a) of the Policy and 15 of the Rules, the Panel shall grant the remedies requested if the Complainant proves that:

(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 has no rights or legitimate interests in respect of the disputed domain name; and

(iii) the disputed domain name has been registered and is being used in bad faith.

Pursuant to paragraph 4(a) of the Policy and 15 of the Rules, for this purpose the Panel shall decide the Complaint on the basis of the statements and documents submitted and in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable, including UDRP jurisprudence as articulated in WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1").

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 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 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 "sender" and "invoice", may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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.

As stated in *Crédit Industriel et Commercial v. Manager Builder, Builder Manager*, WIPO Case No. D2018-2230:

"The disputed domain name incorporates the CIC trademark in its entirety. Numerous UDRP panels have recognized that incorporating a trademark in its entirety can be sufficient to establish that the disputed domain name is at least confusingly similar to a registered trademark (see e.g., *PepsiCo, Inc. v. PEPSI, SRL (a/k/a P.E.P.S.I.) and EMS Computer Industry (a/k/a EMS)*, WIPO Case No. D2003-0696). Moreover, it has been held in many UDRP decisions and has become a consensus view among panelists ……, that where the relevant trademark is recognizable within the disputed domain name, the addition of other terms would not prevent a finding of confusing similarity under the first element of the UDRP."

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.

Furthermore, given the composition of the disputed domain name and the fact that it reproduces the Complainant's well-known trademark in addition to the words "sender" and "invoice", which form part of the services offered by the Complainant, it does not appear likely that there could be any legitimate use of it. WIPO Overview 3.1, section 2.5.1.

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.

In the present case, the Panel notes that the disputed domain name reproduces the Complainant mark, widely known in many countries, which is indicative of bad faith. Furthermore, the composition of the disputed domain name, consisting of the Complainant’s trademark along with added words “sender” and “invoice” suggests that the Respondent was seeking to create an association with the Complainant’s business activities. In this regard, the Complainant has demonstrated its ownership of the domain name <zohoinvoice.com> for the management of its invoices and informs customers of the Complainant’s product “Zoho Invoice”.

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. Factors that have been considered relevant in applying the passive holding doctrine include: (i) the degree of distinctiveness or reputation of the complainant’s mark, (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, (iii) the respondent’s taking active steps to conceal its identity or (iv) the use of false contact details (noted to be in breach of the respondent’s registration agreement),. WIPO Overview 3.1, section 3.3. In the circumstances of this case, the Panel finds that there is no overall plausibility of any (claimed) good faith use to which the domain name may be put and that the passive holding of the disputed domain name does not prevent a finding of 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 <senderzohoinvoice.com> be transferred to the Complainant.

/José Ignacio San Martín Santamaría/
José Ignacio San Martín Santamaría
Sole Panelist
Date: July 14, 2026