

ADMINISTRATIVE PANEL DECISION

Sendinblue dba Brevo v. Ali Hussnain
Case No. D2026-2546

1. The Parties

1.1 The Complainant is Sendinblue dba Brevo, France, internally represented.

1.2 The Respondent is Ali Hussnain, Pakistan.

2. The Domain Names and Registrar

2.1 The disputed domain names <brevoreferral.com>, <brevoreferrals.com>, <brevotool.com>, <crmbrevo.com>, and <toolcrmbrevo.com> (the “Domain Names”) are registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

3.1 The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 11, 2026. At that time, publicly available Whois details did not identify the underlying registrant of the Domain Names.

3.2 On June 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Names. On June 14, 2026, the Registrar transmitted by email to the Center its verification response disclosing underlying registrant and contact information for the Domain Names. The Center sent an email communication to the Complainant on June 15, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint.

3.3 On June 15, 2026, Ali Hussnain, who described himself as the CEO of Sectem Technologies, sent an email to the Center, copying the Complainant, offering settlement terms whereby he would transfer the Domain Names to the Complainant. The Complainant responded to that email on June 17, 2026, with a counter settlement proposal. Settlement terms were not agreed and the Complainant filed an amendment to the Complaint on June 26, 2026.

3.4 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”).

3.5 In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on June 29, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 19, 2026. The Respondent sent email communications to the Center on June 15 and June 26, 2026. The Center notified the Parties of commencement of panel appointment process on July 20, 2026.

3.6 The Center appointed Matthew S. Harris as the sole panelist in this matter on July 24, 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

4.1 The Complainant is a French company registered in the Paris Trade and Companies Register under number 498 019 298. It adopted the Brevo name for its business in 2023 and provides customer relationship management, digital marketing, communications, and related software services, and operates internationally from a website at <brevo.com>.

4.2 The Complainant has more than 600,000 customers, operates in 180 countries, employs over 1,000 people, and in December 2025 became a so-called “unicorn” following a EUR 500 million financing round.

4.3 The Complainant is the owner of various registered trade marks that comprise or incorporate the term BREVO. These include:

(i) European Union registered trade mark no. 018806016 for BREVO as a word mark, registered on April 29, 2023 in Classes 9, 35, 36, 38, and 42;

(ii) United States registered trade mark no. 7,603,898 for BREVO as a standard character mark, registered on December 17, 2024 in Classes 9, 35, 36, 38, and 42; and

(iii) International registration no. 1738724 for BREVO, registered on April 3, 2023 in Classes 9, 35, 36, 38, and 42 and which has proceeded to registration in Brazil, India, Switzerland, and the United Kingdom.

4.4 The Domain Names were registered as follows: <brevoreferral.com> on March 10, 2025; <brevoreferrals.com> on March 17, 2025; <toolcrmbrevo.com> on April 23, 2025; and <brevotool.com> and <crmbrevo.com> on July 8, 2025.

4.5 The following companies were registered on or about the following dates in the following states of the United States of America:

- The Toolcrm LLC on or about January 15, 2025 in Colorado;
- Brevo Referral LLC on or about March 13, 2025 in Missouri;
- ToolCRM Brevo LLC on or about April 23, 2025 in Colorado;
- CRMBrevo LLC on or about July 7, 2025 in Colorado;
- BrevoTool LLC on or about July 7, 2025 in Colorado;
- Toolcrm LLC on or about July 10, 2024 in Colorado.

As at June 10, 2026, The Toolcrm LLC and Toolcrm LLC were recorded on the Colorado register as “Delinquent”.

4.6 Each of the Domain Names has been used for a network of websites purporting to promote or offer CRM, marketing, and referral related services under the BREVO name. In particular, as at June 4, 2026:

- (i) the <brevotool.com> Domain Name was being used for a website claiming to be that of “Brevo Tool LLC” and offering CRM services under various pricing plans;
- (ii) the <crmbrevo.com> Domain Name was being used for a website claiming to be that of “CRMBrevo LLC” and offering CRM services under various pricing plans, using near identical text and formatting and the same colour scheme as the website identified at (i) above;
- (iii) the <brevoreferral.com> Domain Name was being used for a website offering “real estate” related referrals, and using a near-identical layout and predominantly green colour scheme to the website identified at (i) above;
- (iv) the <brevoreferrals.com> Domain Name redirected Internet users to the website identified at (iii) above; and
- (v) the <toolcrmbrevo.com> Domain Name was being used for a website that purported to be offering some sort of CRM dashboard and to be operated by ToolCRM Brevo LLC. Although it uses a different colour scheme to the other websites described above, the dashboard displayed looks identical to one displayed on the <brevoreferral.com> website.

5. Parties’ Contentions

A. Complainant

5.1 The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Names.

5.2 In summary, the Complainant contends that the Domain Names each incorporate the BREVO mark in its entirety and add terms such as “crm”, “tool”, “referral”, and “referrals”, which reinforce rather than diminish the association with the Complainant’s business.

5.3 The Complainant further contends that the Respondent has no rights or legitimate interests in the Domain Names, that the Respondent has not been authorised to use the BREVO mark, and that the use made of the Domain Names falsely suggests affiliation with the Complainant and is directed to commercial gain.

5.4 The Complainant also relies upon the pattern of registrations, the use of a privacy service, the common technical and commercial features of the websites, and the use of the BREVO mark in corporate names, in support of its contentions that the Domain Names were registered and used in bad faith.

5.5 The Complainant also provided evidence of a customer support ticket dated May 11, 2026 in which a person contacted the Complainant after apparently paying USD 299 to the operator of the website operating from the Domain Name <toolcrmbrevo.com>, in the belief that it was paying for an account with the Complainant.

B. Respondent

5.6 No formal Response was filed. However, the Respondent in email communications to the Center on June 15 and June 26, 2026, claimed to operate a technology and website-development business, and that the Domain Names had been registered or administered in connection with services provided to third-party clients, but did not identify the third-party clients said to be involved.

6. Discussion and Findings

A. Procedural Issues

6.1 The Complaint as initially filed claimed that the Domain Names were all under common control and that as a result proceedings in relation to all of the Domain Names should be “consolidated”. Given that the Registrar’s verification response disclosed identical underlying Whols detail for all five Domain Names, there is no need to consider this issue further.

6.2 The Respondent has indicated a willingness to transfer the Domain Names to the Complainant. Where it is clear that a respondent has consented to transfer, it is open to a panel to order transfer on that basis alone. That practice is recorded in section 4.10 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”).

6.3 However, the Panel does not consider it appropriate to proceed solely on that basis in this case, where the Respondent’s emails do not provide unconditional consent to transfer, reference interested (unidentified) third parties, and effectively deny wrongdoing and seek instead certain undertakings and agreements on the part of the Complainant. Accordingly, the Panel considers it appropriate to issue a full decision.

B. Identical or Confusingly Similar

6.4 It is generally 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 trade mark and the Domain Names. [WIPO Overview 3.1](#), section 1.7.

6.5 The Complainant has shown rights in respect of registered trade marks for BREVO for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

6.6 The only sensible reading of each of the Domain Names is as the Complainant’s BREVO mark combined with one or more of the terms “crm”, “tool”, “referral”, or “referrals”, and the “.com” generic Top-Level Domain. Accordingly, the entirety of the Complainant’s mark is reproduced within each of the Domain Names and as a consequence that mark is clearly included in each Domain Name.

6.7 It follows that each of the Domain Names is confusingly similar to the Complainant’s mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7. Further, the addition of the terms “crm”, “tool”, “referral”, and “referrals” does not prevent a finding of confusing similarity between the Domain Names and the Complainant’s mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

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

C. Rights or Legitimate Interests, and Registered and Used in Bad Faith

6.9 It is usual for panels under the Policy to consider the issues of rights or legitimate interests, and registration and use in bad faith, in turn. However, in this case it is more convenient to consider those issues together (see [WIPO Overview 3.1](#), section 2.15).

6.10 The reason for this is that the Panel accepts the Complainant’s contention that each of the Domain Names has been registered for use in connection with a series of connected or similar websites that falsely impersonate the Complainant for commercial gain.

6.11 In this respect, each of the Domain Names incorporates the Complainant’s mark together with words that are either descriptive or at least likely to be read as descriptive of the services that the Complainant offers. There is no obvious sensible alternate reading of any of the Domain Names.

6.12 Further, each of the websites operating from the Domain Names clearly offers the same or similar services to that offered by the Complainant, and the Panel is satisfied that in many cases persons reaching those websites are likely to believe that they have reached a website operated by the Complainant and that this is the deliberate intent of the person or persons who control the Domain Names. The Complainant has also provided evidence of at least one case where a person believed this to be the case and as a consequence paid over the sum of USD 299.

6.13 There is no right or legitimate interest in holding a domain name for the purpose of falsely impersonating a trade mark owner for commercial gain (see sections 2.5 and 2.13.1 of the [WIPO Overview 3.1](#)), and the fact that a domain name is or has been used for such a purpose is evidence that no such right or legitimate interest exists. Further, the registration and use of a domain name for such a purpose involves registration and use in bad faith (see section 3.2.1 of the [WIPO Overview 3.1](#)). In this case each of the websites operating from the Domain Names also falls within the example of circumstances evidencing bad faith registration and use set out in paragraph 4(b)(iv) of the Policy. The Panel also considers that the serial nature of the registrations over a short period of time for similar websites constitutes evidence of a deliberate pattern of abusive conduct.

6.14 Further, the Respondent's claims in email correspondence sent to the Center that he was acting as a website developer or technical service provider for unidentified third-party clients, makes no difference to the analysis.

6.15 First, the Panel is prepared to give little or no weight to the Respondent's assertions in an email that does not comply with the formal requirements of a response set out in paragraph 5(c)(viii) of the Rules. The reasons for this were explained by this Panel in *Audiotech Systems Ltd. v. Videotech Systems Ltd.*, WIPO Case No. [D2008-0431](#) and *MMJ Apparel IP LLC v. Krix Luther*, WIPO Case No. [D2025-3031](#).

6.16 Second, the Respondent does not identify who the relevant third party or parties are who are responsible for these registrations. Even if this were claimed to be done for the corporate entities that the Complainant identifies, there is no evidence before the Panel that these are actually operating as genuine businesses, and the fact that a number of these entities are recorded as "delinquent" suggests otherwise.

6.17 Third, even if the Respondent's claims are correct, as registrant of each of the Domain Names he remains responsible under the Policy for the way in which they are used.

6.18 Accordingly, the Panel finds that the Complainant has established the second and third elements of the Policy.

7. Decision

7.1 For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the Domain Names <brevoreferral.com>, <brevorefferrals.com>, <brevotool.com>, <crmbrevo.com>, and <toolcrmbrevo.com> be transferred to the Complainant.

/Matthew S. Harris/

Matthew S. Harris

Sole Panelist

Date: July 27, 2026