

ADMINISTRATIVE PANEL DECISION

ZipRecruiter, Inc v. Registration Private, Domains By Proxy, LLC
Case No. D2026-2748

1. The Parties

The Complainant is ZipRecruiter, Inc, United States of America, represented by SafeNames Ltd., United Kingdom.

The Respondent is Registration Private, Domains By Proxy, LLC, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <ziprecruiter.help> is registered with Key-Systems GmbH (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 24, 2026. On June 24, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 25, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 25, 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 30, 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 July 1, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 21, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 22, 2026.

The Center appointed Elizabeth Ann Morgan as the sole panelist in this matter on July 30, 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 well-known American online recruitment company that provides services for both individuals and commercial entities. The Complainant attracts more than 157 million global job seekers, 4.3 million employers and has over 40 million job alert email subscribers. Since its inception in 2010, the Complainant has served more than one million employers and 120 million job seekers.

The Complainant has been recognized as one of the fastest-growing technology companies in North America and was ranked 350 in Deloitte's 2019 Technology Fast 500. It was also named on Fast Company's 2019 list of "The World's Most Innovative Companies" within the "Enterprise" sector. The Complainant has further been the recipient of a number of G2 Awards. The Complainant is frequently featured in lists collating the best online job recruitment services. The Complainant is headquartered in the United States but has expanded its reach globally, offering recruitment services to businesses and job seekers in multiple countries.

The Complainant's trademark portfolio covers numerous jurisdictions including but not limited to the following registrations: ZIPRECRUITER, United States Registration No. 3934310, registered on March 22, 2011 in class 42; ZIPRECRUITER, European Union Registration No. 015070873, registered on June 13, 2016 in classes 9, 36, 41 and 42; and ZIPRECRUITER, United Kingdom Registration No. UK00915070873 registered on June 13, 2016, in classes 9, 36, 41 and 42.

The Complainant's online platform is the foundation of its business, which it operates primarily from "www.ziprecruiter.com". It allows employers to post jobs and manage applications and enables job seekers to search for and receive alerts regarding the latest job posts. Through the Complainant's website, job seekers can create a candidate profile to access job opportunities. Employers can use the Complainant's candidate dashboard to streamline candidate review, manage and find qualified candidates. The Complainant's website has received an average of more than 30 million visits per month between January and March 2026.

The Complainant submits that the disputed domain name is identical to the Complainant's ZIPRECRUITER mark. The Respondent has not received any license from the Complainant to use domain names featuring the ZIPRECRUITER trademark.

The Disputed Domain Name was registered in 2026, and it does not resolve to an active 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 that the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights. Respondent lacks a right or a legitimate interest in the disputed domain name. The disputed domain name does not resolve to an active website. The nonuse of a domain name is not considered to constitute a bona fide offering of goods or services.

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 is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

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

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.

Panels have found that the non-use of a domain name 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 distinctiveness and reputation of the Complainant's trademark, and the composition of the disputed domain name, 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.

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 <ziprecruiter.help> be transferred to the Complainant.

/Elizabeth Ann Morgan/

Elizabeth Ann Morgan

Sole Panelist

Date: August 12, 2026