

ADMINISTRATIVE PANEL DECISION

WhatsApp LLC v. Karam Singh
Case No. D2026-2966

1. The Parties

The Complainant is WhatsApp LLC, United States of America ("United States"), represented by Hogan Lovells Cadwalader (Paris) LLP, France.

The Respondent is Karam Singh, India.

2. The Domain Name and Registrar

The disputed domain name <whatsappautomaticreply.com> 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 July 6, 2026. On July 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 7, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 8, 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 July 15, 2026. The Respondent sent the email communications to the Center on July 13, 16 and 17, 2026, notably explaining that he accepted to transfer the disputed domain name, would not contest the Complaint and was willing to open settlement discussions. However, no suspension was requested by the Complainant.

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 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 16, 2026. The Respondent did not file any formal Response.

The Center appointed Mireille Buydens as the sole panelist in this matter on August 26, 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 service and mobile application. The Complainant is a global leader in messaging services for mobile devices, with over three billion monthly active users worldwide. The WhatsApp mobile application has in recent years ranked among the top apps in the market. The Complainant has a strong online presence under its WHATSAPP trademark and is active on various social-media platforms.

The Complainant has a large portfolio of registrations for the WHATSAPP trademark, including (inter alia) the following (hereafter “the WHATSAPP Trademark”):

- Indian Trade mark Registration number 2149059 for WHATSAPP (word mark), registered on May 24, 2011;
- United States trademark registration number 3939463 for WHATSAPP (word mark) registered on April 5, 2011.
- International trademark registration number 1085539 for WHATSAPP (word mark) registered on May 24, 2011.
- European Union trademark registration number 017923676 for WHATS (word mark), registered on March 8, 2019.

The Complainant is the owner of numerous domain names comprising its WHATSAPP trade mark, under various generic Top-Level Domains (gTLDs), including <whatsapp.com> (resolving to its official website) as well as under many country code Top-Level Domains.

The disputed domain name was registered on March 19, 2026. According to the Complaint, the disputed domain name resolves to a website titled “WA Auto-Reply - Your WhatsApp replies on autopilot”, which purports to provide an AI-powered marketing service enabling users to automate replies via WhatsApp. The Respondent’s website references the Complainant’s WHATSAPP Trademark and features a green color scheme similar to that used by the Complainant. The website under the disputed domain name does not include a disclaimer indicating its (lack of) relationship with the Complainant nor any contact information. At the date of this decision, the disputed domain name resolves to an error page.

On June 8, 2026, the Complainant’s lawyers sent an abuse notice via the Registrar’s registrant contact form. According to the Complaint, no response was received.

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.

First, the Complainant contends that it owns prior trademark rights in the WHATSAPP Trademark and that the disputed domain name is confusingly similar to this Trademark, as it reproduces the Complainant's WHATSAPP Trademark in its entirety, followed by the dictionary terms "automatic" and "reply". The addition of the terms "automatic" and "reply" in the disputed domain name does not prevent a finding of confusing similarity with the Complainant's WHATSAPP Trademark, which remains recognizable in the disputed domain name. The gTLD ".com" may be disregarded for the purposes of assessment under the first element.

Second, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is not a licensee of the Complainant, nor is it affiliated with the Complainant in any way or authorized to use the WHATSAPP Trademark in any way. The Respondent's website purports to offer a third party AI-powered reply automation tool for WhatsApp and does not accurately and prominently disclose its lack of relationship with the Complainant in the absence of any visible disclaimer. As a result, the Respondent does not fulfill the Oki Data Test's requirements (*Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#)). The Complainant further submits that the Respondent is not commonly known by the disputed domain name. The Respondent's name does not bear any resemblance to the disputed domain name. To the best of the Complainant's knowledge, there is no evidence of the Respondent having obtained or applied for any trademark registration or similar right for WHATSAPP or any variation as reflected in the disputed domain name. Nor is the Respondent currently making a legitimate noncommercial or fair use of the disputed domain name, as the disputed domain name resolves to a website offering a WhatsApp reply automation service through a paid monthly subscription. Given the nature of the disputed domain name, which incorporates the Complainant's WHATSAPP Trademark in its entirety with the addition of the terms "automatic" and "reply", and the content of the Respondent's website, which prominently references the Complainant's WHATSAPP Trademark and contains no disclaimer clarifying the absence of any affiliation with the Complainant, it is submitted that the Respondent is using the disputed domain name to exploit the goodwill and reputation associated with the Complainant's WHATSAPP Trademark by creating a false impression of association with the Complainant.

The Complainant finally contends that the Respondent registered and uses the disputed domain name in bad faith. Concerning the registration in bad faith, the Complainant submits that, given the renown and goodwill of the Complainant and its Trademark worldwide, the Respondent could not credibly argue that it did not have knowledge of the Complainant's WHATSAPP Trademark when it registered the disputed domain name. Given the content of the website under the disputed domain name, the Respondent registered the disputed domain name, not only with full knowledge of the Complainant's rights, but also with the intent to attract in bad faith Internet users to the its website for the promotion of its own reply automation service

Concerning the use in bad faith, the Complainant contends that the disputed domain name resolves to the Respondent's website offering AI-powered services for automating replies via WhatsApp through a monthly paid subscription. Given the confusing similarity between the disputed domain name and the Complainant's WHATSAPP Trademark, and the content of the Respondent's website, which prominently references the Complainant's WHATSAPP Trademark, features a modified version of the Complainant's telephone logo, and adopts a similar green color scheme, in the absence of any disclaimer regarding the relationship with the Complainant, Internet users are likely to be misled into believing that such third party developed conversation automation tool provided on the Respondent's website is somehow affiliated with or otherwise endorsed by the Complainant, which is not the case. Therefore, the Complainant submits that the Respondent is using the disputed domain name to intentionally attempt to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's Trademark as to the source, sponsorship, affiliation or endorsement of the website and the services offered therein, in bad faith.

B. Respondent

The Respondent sent emails to the Center on July 16 and 17, 2026, explaining that he was willing to transfer the disputed domain name and settle the case, and that he didn't intend to contest the Complaint.

6. Discussion and Findings

Dealing with the Respondent's failure to file a response to the Complaint, paragraph 14(b) of the Rules provides that if a party, in the absence of exceptional circumstances, does not comply with a provision of, or requirement under these Rules, the panel shall be entitled to draw such inferences from this omission, as it considers appropriate.

Paragraph 4(a) of the Policy provides that the Complainant proves each of the following three elements in order to succeed in its Complaint:

- (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.

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 Panel finds the WHATSAPP Trademark is recognizable within the disputed domain name. The disputed domain name reproduces said Trademark in its entirety with the addition of the terms "automatic" and "reply". Accordingly, the disputed domain name is confusingly similar to the WHATSAPP Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms, here "automatic" and "reply", 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 Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

Further, the gTLD ".com" is a standard registration requirement and is typically disregarded in the confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

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. On the contrary, the Respondent has admitted, in its email dated July 16, 2026, that it did not contest the Complaint.

According to the Complaint, the Respondent is not licensed by, nor affiliated with, the Complainant in any way. The Respondent is not an authorized dealer, distributor, or reseller of the Complainant. Panels have recognized that resellers and service providers may be making a bona fide offering of goods and services and thus have a legitimate interest in using a domain name containing the trademark of the products they are distributing. However, in such a case, cumulative requirements apply (also known as the "Oki Data test" – [WIPO Overview 3.1](#), Section 2.8.1), including the fact that the respondent must use the site to sell only the trademarked goods or services and the site must accurately and prominently disclose the registrant's relationship with the trademark holder. In the present case, these two conditions are not met: the website under the disputed domain name purportedly sells a third party application and the website does not accurately and prominently disclose the (lack of) the Respondent's relationship with the Complainant.

There is no evidence that the Respondent is commonly known by the disputed domain name, either. The Respondent's name does not bear any resemblance to the disputed domain name. According to the Complaint, the Respondent has no trademark registration or similar right for WHATSAPP or any variation as reflected in the disputed domain name. Nor is the Respondent currently making a legitimate noncommercial or fair use of the disputed domain name, as the disputed domain name resolves to a website offering a WhatsApp reply automation service through a paid monthly subscription.

The Panel further notes the disputed domain name reproduces the well-known WHATSAPP Trademark with the addition of the descriptive terms "automatic" and "reply". These terms are descriptive for the services offered by the Respondent, namely an automatic reply service for the WhatsApp application. Given the composition of the disputed domain name, and the content of the Respondent's website, which prominently references the Complainant's WHATSAPP Trademark, uses the same green color as the Complainant's official website, and contains no disclaimer clarifying the absence of any affiliation with the Complainant, the Panel considers that the Respondent is using the disputed domain name to exploit the goodwill and reputation associated with the Complainant's WHATSAPP Trademark by creating a false impression of association with the Complainant. Internet users are falsely induced to believe that the website under the disputed domain name is somehow affiliated or endorsed by the Complainant.

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.

Concerning the registration in bad faith, the Panel notes that the Respondent has composed the disputed domain name by reproducing the well-known WHATSAPP Trademark in its entirety with the mere addition of the descriptive terms "automatic" and "reply". Noting the near instantaneous and global reach of the Internet and search engines, and particularly where the complainant's trademark is widely known as it is the case here, and the respondent cannot credibly claim to have been unaware of the trademark, panels have been prepared to infer that the respondent knew, or have found that the respondent should have known, that its registration would be confusingly similar to a complainant's mark. [WIPO Overview 3.1](#), section 3.2.2. Taking into account the reputation of the Complainant's WHATSAPP Trademark, registered long before the disputed domain name (including in India, where the Respondent is purportedly located) and widely used and known worldwide (including on the Internet), the Panel takes the view that the Respondent was well aware of the Complainant's WHATSAPP Trademark when it registered the disputed domain name and registered it with

the intention to mislead Internet users into believing that the disputed domain name is affiliated with, or endorsed by, the Complainant.

Concerning the use in bad faith, the Panel notes that the disputed domain name resolves to the Respondent's website offering AI-powered services for automating replies via WhatsApp through a monthly paid subscription. The website under the disputed domain name prominently depicts the WHATSAPP Trademark, uses the same green color scheme as the Complainant's official website, and does not display any disclaimer explaining the (lack of) relationship with the Complainant. In the Panel's view, these elements demonstrate that the disputed domain name is being used for inducing Internet users into the false belief that the disputed domain name resolves to a website operated or endorsed by the Complainant. As a result, the Panel concludes that the Respondent is using the disputed domain name in bad faith to intentionally attempt to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's Trademark as to the source, sponsorship, affiliation or endorsement of the website and the services offered therein.

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 <whatsappautomaticreply.com> be transferred to the Complainant.

/Mireille Buydens/

Mireille Buydens

Sole Panelist

Date: September 4, 2026