ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Zoho Corporation Private Limited v. LIVIO ANELLI
Case No. D2026-3139

1. The Parties

The Complainant is Zoho Corporation Private Limited, India, represented by Abion GmbH, Switzerland.

The Respondent is LIVIO ANELLI, Italy.

2. The Domain Name and Registrar

The disputed domain name <zohomail.support> is registered with CloudFlare, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 16, 2026. On July 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 17, 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 (DATA REDACTED) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 20, 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 21, 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 24, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 13, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 20, 2026.

The Center appointed Alfred Meijboom as the sole panelist in this matter on August 21, 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 technology company with over 130 million users around the world that provides global cloud-based software offering products including private cloud systems, sales, marketing, finance, Human Resources, legal, security and IT management, BI and analytics, project management and developer platforms. The products offered by the Complainant include cloud-based email and business communication services, commonly known as “Zoho Mail,” which are an integral part of the Complainant’s business software products. The Complainant was founded in 1996 as AdventNet, Inc. and adopted its current name in 2009. The Complainant has brought more than 55 products to the market, and has more than 18,000 employees working in more than 30 offices across 24 different jurisdictions, including Germany, India, the Netherlands (Kingdom of the), Singapore, the United Kingdom, the United States of America, and China.

The Complainant is owner of multiple trademark registrations for ZOHO in different jurisdictions around the world, including:

- International Trademark ZOHO with registration number 929558 of June 19, 2007 for services in class 42, designating, inter alia, the European Union; and

- European Union Trade Mark ZOHO with registration number 018721836 of November 2, 2022 for goods and services in class 9, which trademark registration is jointly owned by the Complainant and its Dutch subsidiary Zoho Corporation B.V.

The Complainant also owns and operates numerous domain names incorporating its ZOHO trademark, including the domain name <zoho.com>, which was registered in 2004 and resolves to the Complainant’s official website, as well as the domain name <zohomail.com>, which was registered in 2005, and redirects Internet users to the subdomain at “www.zoho.com/mail/”, which is the Complainant’s official website dedicated to its Zoho Mail services.

The disputed domain name was registered on June 15, 2026 and is currently inactive. However, before the Complainant’s takedown request of July 8, 2026 to the Registrar, the disputed domain name resolved to a website which prominently displayed the Complainant's ZOHO trademark and branding, purported to offer the Complainant’s services, and included a payment section. According to the Complainant, the disputed domain name was suspended following the aforementioned takedown request.

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 confusingly similar to the Complainant’s ZOHO trademark which is incorporated in the disputed domain name followed by the term “mail”.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name because 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 alleges that there is also no evidence that the Respondent is known by the disputed domain name or owns any corresponding registered trademarks. The Complainant contends that there is no indication that the Respondent used or made demonstrable preparations to use the terms "zohomail.support", "zohomail" or "zoho mail" in connection with a bona fide offering of goods or services; on the contrary as the disputed domain name had been used to resolve to a website that falsely suggested that it was owned, operated, endorsed, or otherwise authorized by the Complainant, thereby creating a misleading impression of affiliation with the Complainant, and giving the false impression that Internet users were accessing or purchasing legitimate services provided by the Complainant. The Complainant contends that, if it would be established that the Respondent is a distributor, reseller or service provider of the Complainant's products, it did not meet the so-called Oki Data criteria because the website to which the disputed domain name resolved did not contain any clear or prominent disclosure of the relationship between the Complainant and the Respondent.

According to the Complainant, the disputed domain name was registered in bad faith given the structure of the disputed domain name making it inconceivable that the Respondent registered the disputed domain name without prior knowledge of the Complainant's well-known ZOHO trademark and without the intention to target it.

The Complainant also contends that the Respondent is using the disputed domain name in bad faith because the overall presentation of the Respondent's website falsely suggested that it was owned, operated, endorsed, or otherwise authorized by the Complainant, thereby creating a misleading impression of affiliation with the Complainant and falsely suggesting that it was operated by, affiliated with, endorsed, or otherwise authorized by the Complainant, and that the products and services offered through the website were genuine services of, or otherwise connected with, the Complainant's well-known ZOHO business software ecosystem and Zoho Mail. As the bottom of the Respondent's website prominently displayed the Complainant's figurative trademark together with the copyright notice "© 2026 Zoho Corporation Pvt. Ltd. All Rights Reserved", which reinforced the false impression that Internet users were accessing or purchasing legitimate services provided by the Complainant. Such conduct materially increased the likelihood of user confusion and exposed Internet users to the risk of phishing, financial fraud, and the unauthorized collection of personal or payment information.

B. Respondent

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

6. Discussion and Findings

The Respondent did not file a Response. However, as set out in WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 4.3, the consensus view of UDRP panels is that the respondent's default does not automatically result in a decision in favor of the Complainant. The Complainant must still establish each of the three elements required by paragraph 4(a) of the Policy. Although the Panel may draw appropriate inferences from the Respondent's default, paragraph 4 of the Policy requires the Complainant to support its assertions with actual evidence in order to succeed in this proceeding. Paragraph 14(b) of the Rules provides that, in the absence of exceptional circumstances, the panel shall draw such inferences as it considers appropriate from a failure of a party to comply with a provision or requirement of the Rules. The Panel finds that in this case there are no such exceptional circumstances.

Under the Policy, the Complainant must prove 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 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 3.1, section 1.7.

The Panel finds that the ZOHO trademark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the Complainant's ZOHO trademarks for the purposes of the Policy (WIPO Overview 3.1, section 1.7).

Although the addition of other terms, in the disputed domain name the word "mail", 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.

Based on the available record, 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 Complainant has demonstrated that the website to which the disputed domain name resolved attempted to pass itself off as originating from the Complainant by using the Complainant's word and device marks, by referring to the Complainant's mail services, and by placing, at the bottom of the website, and in particular on the web page where the Internet user was required to enter payment information, a copyright notice bearing the Complainant's name, while it remains undisputed that the Respondent and the Complainant have no ties and that the Complainant did not grant the Respondent authorization to do so. For these reasons, the Respondent cannot be considered a distributor, reseller, or provider of the Complainant's products, and the Panel is satisfied that the disputed domain name is not being used in connection with a bona fide offering of goods or services, and that the Respondent has no rights or legitimate interests in the disputed domain name.

Furthermore, the Panel infers from the request for payment information on the Respondent's website that the disputed domain name was possibly used for phishing or other illegal activities. Since the Complaint made this assertion, it was incumbent upon the Respondent to rebut it and provide a reasonable explanation for its conduct. By failing to do so, the Panel is satisfied that it is reasonably likely that the disputed domain name has been used for illegal activities and, in the Respondent sole discretion, could be used for such purposes again. Panels have held that the use of a domain name for illegal activity can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1.

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 is satisfied that the Respondent must have had the Complainant's ZOHO trademark in mind when it registered the disputed domain name because the disputed domain name incorporates the ZOHO trademark in its entirety, followed by the term "mail", which makes the disputed domain name identical to the name of the Complainant's email and business communication services and its related domain name since 2005, <zohomail.com>. Furthermore, the fact that the disputed domain name, immediately or shortly after registration, resolved to a website that used the Complainant's trademarks and name to solicit payment information from Internet users is an indication that the disputed domain name was registered with the objective of targeting the Complainant and its ZOHO trademark. Under these circumstances, the Panel is satisfied that the Respondent registered the disputed domain name in bad faith.

As it remained undisputed that the disputed domain name had been deployed as part of illegal activities (see paragraph 6.B), such behavior can never confer rights or legitimate interests on a respondent and is manifestly considered evidence of bad faith. WIPO Overview 3.1, section 3.1.4. The Panel is therefore satisfied that the Complainant showed that the Respondent is also using the disputed domain name in bad faith as meant in paragraph 4(b)(iv) of the Policy.

Since the disputed domain name may currently not be used, the Panel also considers that panelists 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, panelists 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 or inaccurate contact details (noted to be in breach of the respondent's registration agreement). WIPO Overview 3.1, section 3.3. Given the circumstances of this case, and more specifically the recent prior use of the disputed domain name and the Respondent's failure to provide any clarification, the Panel finds that it is not plausible that the disputed domain name could be used in good faith, and that the current passive holding of the disputed domain name does not preclude a finding of bad faith under the Policy.

The Panel finds the third element of the Policy has been established.

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 <zohomail.support> be transferred to the Complainant.

/Alfred Meijboom/
Alfred Meijboom
Sole Panelist
Date: August 27, 2026