# ADMINISTRATIVE PANEL DECISION
Zoho Corporation Private Limited v. Hulmiho Ukolen, Poste restante
Case No. D2026-3222

## 1. The Parties

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

The Respondent is Hulmiho Ukolen, Poste restante, Finland.

## 2. The Domain Name and Registrar

The disputed domain name <joinzoho.com> is registered with Gransy, s.r.o. d/b/a subreg.cz (the “Registrar”).

## 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 22, 2026. On July 22, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 23, 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 (Whois protection, this company does not own this domain name s.r.o.) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 24, 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 27, 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 28, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 17, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 21, 2026.

The Center appointed Zeynep Yasaman as the sole panelist in this matter on August 25, 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, Zoho Corporation Private Limited, is a technology company headquartered in India. It was founded in 1996 as AdventNet, Inc., launched its first software under the “Zoho” brand, “Zoho Virtual Office”, in 2004, and was renamed Zoho Corporation Private Limited in 2009. The Complainant offers cloud-based software products and solutions globally across, among other areas, sales, marketing, finance, human resources, IT management, and analytics. The Complainant also provides an online collaboration and communication platform referred to as “Join Zoho”, which forms part of its cloud-based software ecosystem and enables users to collaborate, communicate, and conduct online meetings, including through video conferencing, screen sharing, and messaging.

The Complainant is the owner of trademark registrations for ZOHO in numerous jurisdictions, including the following:

- International trademark ZOHO No. 929558, registered on June 19, 2007, in class 42, designating, inter alia, Finland (where the Respondent is located);
- United States of America (“United States”) trademark ZOHO No. 3260807, registered on July 10, 2007, in class 42;
- United States trademark ZOHO No. 3394704, registered on March 11, 2008, in class 9; and
- United Kingdom trademark ZOHO No. UK00800929558, registered on June 23, 2008, in class 42.

The Complainant also owns and operates domain names incorporating its ZOHO trademark, including <zoho.com>, registered in 2004, which resolves to its official website, as well as, according to the Complainant, <zoho.eu>, <zoho.it>, and <zoho.fr>.

The disputed domain name <joinzoho.com> was registered on May 4, 2010. According to the evidence submitted by the Complainant, over the years, the disputed domain name resolved to various parking pages displaying pay-per-click (“PPC”) links relating to, inter alia, remote assistance, online meetings, instant messaging, and web-conferencing services. More recently, it redirected Internet users to various unrelated third-party websites, including websites concerning programming and software, digital marketing services, browser software, online shopping tools, and online gambling. At the time of drafting this Decision, the Panel notes that the disputed domain name redirects to the Complainant’s website at “www.zoho.com”.

On June 16, 2026, the Complainant, through its representative, sent a cease-and-desist letter to the registrant of the disputed domain name, both via the privacy service email address appearing in the WhoIs records and through the Registrar’s contact form. A copy of the letter was also sent to the Registrar with a request that it be forwarded to the registrant. The letter requested, inter alia, that the registrant cease using the disputed domain name and cancel its registration. The Complainant sent follow-up reminders to the registrant and the Registrar on June 26 and July 2, 2026. The Respondent did not reply to these communications.

**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 it holds rights in the notorious ZOHO trademark, registered in numerous jurisdictions, and that the disputed domain name is confusingly similar to that trademark, as it incorporates the ZOHO trademark in its entirety in its second-level portion, merely preceded by the term "join". The Complainant submits that the ZOHO trademark remains clearly recognizable within the disputed domain name, that the addition of the term "join" does not prevent a finding of confusing similarity, and that the generic Top-Level Domain ".com" is to be disregarded for the purposes of the first element.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It asserts that there has never been any relationship between the Complainant and the Respondent, that it has never authorized or licensed the Respondent to use the ZOHO trademark. The Complainant further submits that the use of the disputed domain name to redirect Internet users to random third-party websites and to PPC parking pages capitalizing on the reputation of the ZOHO trademark does not amount to a bona fide offering of goods or services or a legitimate noncommercial or fair use, and that the composition of the disputed domain name, combining the term "join" with the Complainant's well-known ZOHO trademark and mirroring the Complainant's own "Join Zoho" platform, reflects the Respondent's intention to create a false association with the Complainant. The Complainant further submits that the Respondent's failure to respond to the cease-and-desist letter, coupled with its use of a privacy service to conceal its identity, supports the conclusion that the Respondent has no rights or legitimate interests in the disputed domain name.

The Complainant contends that the disputed domain name was registered in bad faith. According to the Complainant, most of its trademark registrations predate the registration of the disputed domain name, and the Respondent was never authorized to register a domain name incorporating the ZOHO mark. The disputed domain name reproduces the ZOHO mark in its entirety together with the term "join", which the Complainant submits is relevant to its core activities and platforms. Given the reputation of the ZOHO mark, the composition of the disputed domain name, and the results that would have been revealed by a simple Internet search, the Complainant maintains that the Respondent must have been aware of the Complainant and its mark when registering the disputed domain name. The Complainant further submits that the disputed domain name's use over the years in connection with PPC pages containing links relating to the Complainant's services and other third-party services, as well as its occasional redirection to the Complainant's official website, confirms that the Respondent registered the disputed domain name with the Complainant and its ZOHO mark in mind, intending to attract Internet users by creating a likelihood of confusion with the Complainant. As to bad faith use, the Complainant contends that the composition of the disputed domain name is intended to create an association with the Complainant and its "Join Zoho" online collaboration and communication platform, which the Complainant operates through the subdomain names <join.zoho.com> and <join.zoho.com.au>. The Complainant submits that the disputed domain name's redirection to various unrelated third-party websites, PPC pages displaying links relating to the Complainant's services and other services, and, at times, the Complainant's own website constitutes an intentional attempt to attract Internet users for commercial gain by creating a likelihood of confusion with the ZOHO mark. The Complainant further relies on the Respondent's failure to reply to its cease-and-desist letter as additional evidence of bad faith. Finally, the Complainant notes that the Respondent has been the unsuccessful respondent in numerous previous UDRP proceedings concerning abusive domain name registrations. According to the Complainant, this history demonstrates a pattern of conduct aimed at preventing trademark owners from reflecting their marks in corresponding domain names within the meaning of paragraph 4(b)(ii) of the Policy.

**B. Respondent**

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

**6. Discussion and Findings**

**A. Identical or Confusingly Similar**

Paragraph 4(a)(i) of the Policy requires the Complainant to show that the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights.

Where the complainant holds a nationally or regionally registered trademark or service mark, this prima facie satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case (WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.2.1). In the present case, the Panel notes that the Complainant owns registered ZOHO trademarks. Accordingly, the Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy.

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 notes that the disputed domain name reproduces the Complainant's ZOHO trademark in its entirety in its second-level portion, preceded by the term "join" and followed by the generic Top-Level Domain ("gTLD") ".com". It is well established that where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element (WIPO Overview 3.1, section 1.8).

The ZOHO trademark remains clearly recognizable within the disputed domain name, and the Panel considers that, while the addition of the term "join" may bear on the assessment of the second and third elements, it does not prevent a finding of confusing similarity. Similarly, the applicable gTLD ".com" is viewed as a standard registration requirement and, as such, is disregarded under the first element confusing similarity test (WIPO Overview 3.1, section 1.11.1). Accordingly, the Panel finds that the disputed domain name is confusingly similar to the Complainant's trademark for the purposes of the Policy.

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 that 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 established that the Respondent is neither affiliated with the Complainant nor authorized or licensed by the Complainant to use the ZOHO trademark or to register the disputed domain name. There is no evidence that the Respondent is commonly known by the disputed domain name; the registrant information disclosed by the Registrar does not resemble the disputed domain name in any manner. Moreover, there is no evidence in the record that the Respondent owns any trademark rights corresponding to "joinzoho" or "join zoho".

As to the use of the disputed domain name, the evidence shows that it resolved, through automatic redirections, to a succession of third-party websites and to parking pages featuring PPC links to third-party services and to services relating to those of the Complainant. Applying UDRP paragraph 4(c), panels have found that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links capitalize on the reputation and goodwill of the complainant's mark or otherwise mislead Internet users (WIPO Overview 3.1, section 2.9). In this case, such use cannot be regarded as a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy, nor as a legitimate noncommercial or fair use under paragraph 4(c)(iii). The disputed domain name's redirection to third-party sites and the Complainant's own website likewise does not confer rights or legitimate interests on the Respondent.

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 Complainant's ZOHO trademark was registered and used before the disputed domain name was registered. The disputed domain name reproduces the ZOHO trademark in its entirety, preceded by the term "join", which, as combined, corresponds to the name of the Complainant's online collaboration platform. The Panel further notes that the Complainant's ZOHO trademark is protected inter alia through International Registration No. 929558, in Finland, where the Respondent is located. Having regard to the distinctive character of the ZOHO trademark, the particular composition of the disputed domain name, and the subsequent use of the disputed domain name for PPC links relating, inter alia, to remote assistance, online meetings, instant messaging, and web-conferencing services, as well as its redirection, at times, to the Complainant's own website, the Panel finds, on the balance of probabilities, that the Respondent was aware of and deliberately targeted the Complainant and its ZOHO trademark when registering the disputed domain name. Accordingly, the Panel finds that the disputed domain name was registered in bad faith.

As to use, the evidence shows that, over the years, the disputed domain name has been used, through automatic redirections, to resolve to PPC parking pages and various third-party websites. In particular, some of the PPC pages displayed links relating to services associated with the Complainant's field of activity. The Panel finds, on the balance of probabilities, that such use was intended to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's ZOHO trademark as to the source, sponsorship, affiliation, or endorsement of the associated websites, within the meaning of paragraph 4(b)(iv) of the Policy. The fact that the disputed domain name has also redirected, at times, to third-party sites and currently redirects, to the Complainant's official website does not assist the Respondent; rather, it further confirms the Respondent's awareness and targeting of the Complainant and its trademark.

The Panel further finds that the evidence submitted by the Complainant establishes that the Respondent, Hulmiho Ukolen, Poste restante, has been named as respondent in a very large number of prior UDRP proceedings in which domain names incorporating third parties' trademarks were ordered transferred, and has thereby engaged in a well-documented pattern of abusive registration of domain names reflecting the trademarks of others (see e.g. *Schnellecke Group AG & Co. KG, Schnellecke Logistics SE v. Hulmiho Ukolen, Poste restante*, WIPO Case No. D2024-2612). Such conduct constitutes a pattern of registering domain names in order to prevent trademark owners from reflecting their marks in corresponding domain names, and provides further evidence of bad faith under paragraph 4(b)(ii) of the Policy (WIPO Overview 3.1, section 3.1.2).

Finally, the Panel notes that the Respondent used a privacy service in connection with the disputed domain name and failed to respond to the Complainant's cease-and-desist correspondence or to participate in these proceedings. While neither circumstance is, in itself, determinative, both provide additional support, in the circumstances of this case, for the Panel's finding of bad faith (WIPO Overview 3.1, sections 3.6 and 4.3).

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 <joinzoho.com> be transferred to the Complainant.

*/Zeynep Yasaman/*
**Zeynep Yasaman**
Sole Panelist
Date: September 8, 2026