

ADMINISTRATIVE PANEL DECISION

WhatsApp, LLC v. JAMIL Bhagri
Case No. D2026-3272

1. The Parties

The Complainant is WhatsApp, LLC, United States of America, (“U.S.” or “the United States”) represented by Ashurst Perkins Coie US LLP, U.S.

The Respondent is JAMIL Bhagri, Pakistan.

2. The Domain Name and Registrar

The disputed domain name <gbwhatsappmod.com> is registered with Hosting Concepts B.V. d/b/a Registrar.eu. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 24, 2026. On July 29, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 30, 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, Gbwta) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 30, 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 amendment to the Complaint on August 3, 2026.

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”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on August 6, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 26, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 27, 2026.

The Center appointed Igor Alfiorov as the sole panelist in this matter on August 31, 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, WhatsApp, LLC, is a company organized under the laws of the United States and is a global provider of a popular and world-renowned mobile messaging and voice-over-IP services under the trademark WHATSAPP. The Complainant's messaging application has been in continuous and extensive use since 2009, serving over two billion users worldwide.

The Complainant holds numerous registered trademarks for the WHATSAPP mark globally, including:

- Word trademark for WHATSAPP under the US Trademark Registration No. 3939463, registered on April 5, 2011, and
- Word trademark for WHATSAPP under the European Union Trademark Registration No. 009986514, registered on October 25, 2011.

The disputed domain name <gbwhatsappmod.com> was registered on October 21, 2025. At the time of filing the Complaint, the disputed domain name resolved to an active website named "GB WhatsApp" proposing the download of an application described as, inter alia, "an enhanced version of the official WhatsApp application, developed by independent creators to offer extended functionality beyond the original app". The website displayed a green speech bubble logo featuring a telephone icon containing the letters "GB", mimicking the Complainant's official logo and trade dress.

At the date of this Decision, the disputed domain name is inactive.

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 the disputed domain name is confusingly similar to its well-known WHATSAPP trademark. The addition of the abbreviations "gb" and the term "mod" does not prevent confusing similarity, but rather exacerbates it by directly referencing an unauthorized modification of the Complainant's software, suggesting an association or endorsement that does not exist.

Second, the Complainant submits that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is not licensed or authorized by the Complainant, is not commonly known by the disputed domain name, and has used it to offer an unauthorized, modified version of the Complainant's app in order to offer putative modified mobile application services. The Complainant argues that this does not constitute a bona fide offering of goods or services, particularly as the site has been flagged by cybersecurity vendors as malicious and associated with malware. Furthermore, the Complainant's Terms of Use explicitly prohibit such use of its trademarks.

Third, the Complainant contends that the disputed domain name was registered and is being used in bad faith. The Respondent registered the disputed domain name with full knowledge of the famous WHATSAPP mark.

The Respondent is using the disputed domain name to intentionally attract Internet users to its website for commercial gain by creating a likelihood of confusion, and has ignored the Complainant's cease-and-desist notifications sent in June 2026.

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 Panel finds that the Complainant has established rights in the WHATSAPP trademark through its numerous global registrations.

The disputed domain name <gbwhatsappmod.com> incorporates the Complainant's WHATSAPP trademark in its entirety.

The addition of the prefix "gb" (a common abbreviation associated with modified applications) and the suffix "mod" (a generic term for software modifications) does not prevent a finding of confusing similarity, as the Complainant's mark remains recognizable within the domain name. [WIPO Overview 3.1](#), section 1.8.

The generic Top-Level Domain suffix ".com" is a technical requirement and is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

Accordingly, 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.

The Panel finds that the Complainant has established an un rebutted prima facie case. The Respondent is not affiliated with or authorized by the Complainant, has not been licensed to use the Complainant's mark, and is not commonly known by the disputed domain name. The Complainant has provided evidence that, at the time of filing, the disputed domain name resolved to an active website offering for download a purportedly unauthorized

and, modified version of the Complainant's application. Under [WIPO Overview 3.1](#), section 2.11, panels assess claimed respondent rights or legitimate interests at the time of the filing of the complaint.

The Respondent's use of the disputed domain name, which incorporates the Complainant's trademark together with terms referring to a modified version of its application, carries a risk of implied affiliation. That risk is reinforced by the website's prominent use of the Complainant's trademark and branding and by the absence of any prominent and accurate disclosure of the Respondent's relationship with the Complainant. Such use cannot constitute a bona fide offering of goods or services.

Moreover, under [WIPO Overview 3.1](#), section 2.13.1, panels categorically hold that the use of a domain name for illegal or misleading activity, such as operating a copycat site or distributing unauthorized software that poses security/malware risks to users, can never confer rights or legitimate interests on a respondent.

The Respondent did not file a response to contest any of these facts.

The Panel therefore finds that the second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel finds that the Respondent registered and used the disputed domain name in bad faith.

The Complainant's WHATSAPP trademark is an invented, highly distinctive word that enjoys a well-established global reputation.

Given that the WHATSAPP is a worldwide famous and well-recognized trademark, it is inconceivable that the Respondent registered the disputed domain name <gbwhatsappmod.com> without knowledge of the Complainant's rights. In particular, this is also confirmed by the disputed domain name's composition: combining the famous mark with additional terms ("gb" and "mod") specifically targeting the Complainant's application, which demonstrates a deliberate targeting of the Complainant's business. [WIPO Overview 3.1](#), section 3.2.1.

This closely mirrors established UDRP practice where the combination of a highly distinctive trademark with terms representing the complainant's core product is considered clear evidence of bad faith targeting.

The Respondent's prior use of the disputed domain name to operate a website that impersonated the Complainant's business and logo to distribute unauthorized software represents an intentional attempt to attract Internet users to its website for commercial gain by creating a likelihood of confusion with the Complainant's mark, which constitutes bad faith under paragraph 4(b)(iv) of the Policy.

Although the disputed domain name is currently inactive, this passive holding does not preclude a finding of bad faith under the doctrine established in [WIPO Overview 3.1](#), section 3.3.

The Respondent's bad faith is further supported by his failure to respond to the Complainant's cease-and-desist communications sent in June 2026, and his subsequent failure to participate in this proceeding, leaving the Complainant's evidence-backed allegations of bad faith registration and use entirely uncontested.

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 <gbwhatsappmod.com> be transferred to the Complainant.

/Igor Alfiorov/

Igor Alfiorov

Sole Panelist

Date: September 14, 2026