

ADMINISTRATIVE PANEL DECISION

AirGSM Pte Ltd. v. Cameron Williams

Case No. D2026-3704

1. The Parties

The Complainant is AirGSM Pte Ltd., Singapore, represented by Lewis Silkin LLP, United Kingdom.

The Respondent is Cameron Williams, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <airalo.one> is registered with NameSilo, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 17, 2026. On August 20, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 20, 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, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 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 amendment to the Complaint on August 24, 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 31, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 20, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 24, 2026.

The Center appointed Teruo Kato as the sole panelist in this matter on September 29, 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 contends, uncontested, that the Complainant's business was incorporated in 2019 and it trades under the name Airalo and that since 2019 it has enjoyed aggressive growth and is regarded as the world's leading provider of digital SIM (eSIM) cards, providing its services to over 20 million customers in over 200 countries and that it employs over 200 people, spread over 44 countries and six continents.

The Complainant submitted certain documentary evidence indicating that it owns a portfolio of trademark registrations, including in particular:

- Singapore Trademark Registration No. 40201914330P for AIRALO (word and figure combined) registered on December 19, 2019 in classes 9, 35 and 38; and
- International Trademark Registration No. 1701049 for AIRALO (figurative) registered on August 18, 2022 in classes 9, 35 and 38.

The disputed domain name was registered on January 6, 2026. The disputed domain name resolves to an inactive page.

The Complainant contends that the disputed domain name is intended for use as a means to defraud customers and individuals by purporting to derive from, or have some connection with, the Complainant and that the disputed domain name poses a high risk that it will be used for fraudulent purposes, for example phishing or the sending of deceptive emails, with a view to obtaining sensitive or confidential personal or financial information from the Complainant's customers or members of the public. No evidence, however, has been submitted by the Complainant to support this contention.

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.

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 generic Top-Level Domain (“gTLD”), here “.one”, is viewed as a standard registration requirement and as such is typically disregarded under the first element 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.

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.

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.

In this connection, the Panel takes a note that there was a preceding UDRP dispute between the Complainant and the Respondent, which has been decided in favour of the Complainant, namely, *AirGSM Pte Ltd v. Cameron Williams*, WIPO Case No. [D2026-0408](#). In that case, the Respondent had registered

<airalo.help> on January 18, 2026, with the same Registrar, thus only 12 days after the registration of the disputed domain name of the present dispute.

Contrary to the non-use found in the present dispute, the Respondent was engaged in actively using said domain name, as recorded in the preceding decision (see below):

- “[the disputed domain name] resolved to website prominently featuring the Complainant’s trademark, falsely pretending to be of the Complainant’s and offering digital SIM cards for sale in the United Arab Emirates.”; and
- “In this case, the disputed domain name was resolving to a website featuring the Complainant’s trademark and falsely pretended to be official Complainant’s website to intentionally attract Internet users by creating likelihood of confusion with the Complainant’s trademark as to the source of the website and its products. The Panel finds the above confirms the disputed domain name was registered and used in bad faith.”

The above indicates that the Respondent had engaged in a pattern of registering domain names targeting the Complainant, which further supports a finding of bad faith here.

The Panel further notes that the Respondent has not participated in the current proceedings and has failed to respond to any of the Complainant’s contentions submitted in the present proceedings (as was the case with the above-mentioned preceding dispute).

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

Having reviewed the available record, 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 <airalo.one> be transferred to the Complainant.

/Teruo Kato/

Teruo Kato

Sole Panelist

Date: October 5 2026