ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Instagram, LLC v. ZingFront HongKong Limited, Feng Deng, ZingFront Hongkong Limited
Case No. D2026-3942

1. The Parties

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

The Respondents are ZingFront HongKong Limited, Feng Deng, China, and ZingFront Hongkong Limited, United States. As the Panel has decided to consolidate the domain name registrants in this proceeding, as further detailed below, the Panel will hereinafter refer to the Respondents collectively as "the Respondent".

2. The Domain Names and Registrars

The disputed domain name <igexporter.net> is registered with NameSilo, LLC, and <igtools.ai> is registered with GoDaddy.com, LLC (the "Registrars").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 3, 2026. On September 4, 2026, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. On September 4, 2026, the Registrars transmitted by email to the Center their verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Registration Private, Domains By Proxy, LLC and User #a4888fb1 Privacy, See PrivacyGuardian.org) and contact information in the Complaint.

The Center sent an email communication to the Complainant on September 7, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on September 10, 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 September 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 6, 2026.

The Respondent sent an email communication to the Center on September 20, 2026, requesting an extension for filing of the Response under paragraph 5(b) of the Rules. The Center granted the requested automatic four-day extension on September 21, 2026. Therefore, the new due date for Response was October 10, 2026. The Respondent did not file any Response by the extended due date. Accordingly, the Center notified the Commencement of Panel Appointment process on October 13, 2026.

The Center appointed John Swinson as the sole panelist in this matter on October 23, 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 an international online photo and video sharing social networking application that was launched in 2010.

According to one source, the Instagram application is currently the third most downloaded mobile applications worldwide.

The Complainant has secured ownership of numerous trademark registrations for IG and INSTAGRAM in many jurisdictions, including but not limited to the following:

- European Union Trade Mark No. 017946393 for IG, registered on January 31, 2019;
- Australian Trademark Registration No. 1950863, for IG, registered on August 24, 2018; and
- Chinese Trade Mark No. 54667237, for IG, registered on August 14, 2023.

The disputed domain name <igtools.ai> was registered on November 8, 2023.

The disputed domain name <igexporter.net> was registered on June 12, 2024.

When the Complaint was filed (and at the time of this Decision), the disputed domain name <igtools.ai> resolved to a website that purports to offer a free Chrome extension called the "IG Follower Export Tool" that enables Internet users to download personal identifying data about Instagram followers, either in CSV or XLSX format. The extension purports to allow Internet users to "Effortlessly get everything you want from any User" and to "scrape over 50K IG followers or IG followings within one click." The website features a pink/purple colour scheme that is similar to the Instagram gradient colour scheme.

When the Complaint was filed, the disputed domain name <igexporter.net> resolved to a website that purports to offer a tool called "IGExport" that enables Internet users to export personal identifying data about Instagram followers, including their Instagram bio, email address, picture and phone number, to CSV or Excel format. The website states "there is no problem to scrape 100k followers and you will get a follower list in seconds" and invites Internet users to "Elevate Instagram marketing with our email scraping feature".

Both these websites included multiple references to IG and INSTAGRAM.

At the time of this Decision, the disputed domain name <igexporter.net> redirects to a website at "www.soleads.ai" that has the heading "Social Media Data Exporter for Instagram, TikTok & More".

According to the Complainant, on June 29, 2026, the Complainant's lawyers sent a cease-and-desist letter to the Respondent via email. The Complainant's lawyers did not receive a response.

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 names.

In summary, the Complainant makes the following submissions.

The Complainant owns numerous trademark registrations for IG in jurisdictions throughout the world. The presence of its IG trademark in the disputed domain names is sufficient to establish confusing similarity between the disputed domain names and the Complainant's trademark. The addition of the terms "exporter" and "tools" to its IG trade mark does not prevent a finding of confusing similarity with its trademark, which remains clearly recognizable in the disputed domain names.

The Respondent is not a licensee of the Complainant. The Respondent is not affiliated with the Complainant in any way. The Complainant has not granted any authorization for the Respondent to make use of its IG or INSTAGRAM trademark, in a domain name or otherwise.

The Respondent cannot be viewed as a bona fide service provider as it does not provide sales or repairs in relation to a product provided by the Complainant. Rather, the Respondent is making unauthorized use of the Complainant's IG trademark to market its own ancillary services, namely purporting to offer a tool or Chrome extension to enable Internet users to export the personal identifying data of Instagram followers, including email addresses, pictures and phone numbers.

The Respondent is not a bona fide service provider in that it does not provide services for the proper use of the Complainant's product. Rather, the Respondent's websites purport to offer a tool or Chrome extension to export the personal identifying data of Instagram followers. The downloading of such personal identifying information places the privacy and security of Instagram users at risk, and information scraped from the Instagram platform may be stored and later used for unauthorized purposes by third parties.

B. Respondent

In an email communication from the Respondent to the Center on September 20, 2026, the Respondent stated the following:

"… Without admission of liability, bad faith, trademark infringement, or any of the allegations made in the Complaint, we confirm that the content previously hosted at <igexporter.net> has been removed. As of September 20, 2026, the domain name permanently redirects to the separately branded website at <soleads.ai> and no longer independently hosts the IGExporter-branded website described in the Complaint.

We are continuing to review the Complaint and the allegations concerning both disputed domain names, including <igtools.ai>. …

The Respondent also wishes to explore an amicable resolution of this matter. We invite the Complainant to confirm whether it is willing to enter into settlement discussions and jointly request suspension of the proceeding for that purpose. If the Complainant agrees, the Respondent consents to such a suspension.

This communication is preliminary, is not the Respondent's formal Response, does not constitute consent to the remedy requested in the Complaint, and does not constitute consent to the transfer or cancellation of either disputed domain name. The Respondent reserves all rights."

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements enumerated in paragraph 4(a) of the Policy have been satisfied in respect of each disputed domain name, namely:

(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.

Each disputed domain name must be considered separately.

The onus of establishing these elements is on the Complainant.

Consolidation: Multiple Respondents

The amended Complaint was filed in relation to domain name registrants with the same name but apparently located in different addresses. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request, and in the email of September 20, 2026, referred to both disputed domain names.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 4.11.2.

As regards common control, the Panel notes the following:

The underlying registrant details for both of the disputed domain names list ZingFront Hongkong Limited as the registrant. The websites at both of the disputed domain names feature the same email address. The nature of the disputed domain names is similar, each comprising the Complainant's IG trade mark followed by an additional term, either "exporter" or "tools". Both of the websites at the disputed domain names purport to provide very similar tools or Chrome Extensions, which enable Internet users to download personal identifying information of Instagram users.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

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 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 mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

Although the addition of other terms (here, "exporter" or "tools") 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 names and the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

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 names. 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 names such as those enumerated in the Policy or otherwise.

The Panel finds that the Respondent is not using and has not used the disputed domain names in connection with a bona fide offering of goods or services within the meaning of paragraph 4(c)(i) of the Policy.

The Respondent is making unauthorized use of the Complainant's IG trademark to market its own ancillary services, namely purporting to offer a tool or Chrome extension to enable Internet users to export the personal identifying data of Instagram followers, including email addresses, pictures and phone numbers. The Panel also notes that the reproduction of the Complainant's IG trademark in the disputed domain names along with the ostensive use of the Complainant's trademark in the content of the websites, may result in user confusion and, in this context, the Panel finds the Respondent's use of the disputed domain name does not amount to a bona fide offering of goods and services under the Policy.

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

C. Registered and Used in Bad Faith

Generally speaking, a finding that a domain name has been registered and is being used in bad faith requires an inference to be drawn that the respondent in question has registered and is using the disputed domain name to take advantage of its significance as a trademark owned by the complainant.

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.

In the present case, it is clear that the Respondent was aware of the Complainant and its Instagram app when registering the disputed domain names.

The Respondent's intent to target the Complainant when registering the disputed domain names may be inferred from the contents of the website to which the disputed domain names resolve, which make explicit reference to Instagram and make prominent use of the Complainant's trademarks.

As detailed above, the Respondent used the disputed domain names to resolve to websites that purport to offer a Chrome extension or a tool that enables Internet users to export personal identifying information of Instagram users. The Panel find that this constitutes bad faith use.

Further, at the present time, the disputed domain name <igexporter.net> redirects to a website at <soleads.ai> that has the heading "Social Media Data Exporter for Instagram, TikTok & More".

The Respondent is using the disputed domain names to intentionally attempt to attract, for commercial gain, Internet users to the Respondent's website, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website, contrary to paragraph 4(b)(iv) of the Policy.

In short, the Panel considers that the Respondent registered and used the disputed domain names in bad faith to create a misleading impression of association with the Complainant.

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 names <igexporter.net> and <igtools.ai> be transferred to the Complainant.

/John Swinson/
John Swinson
Sole Panelist
Date: November 6, 2026