ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Zoho Corporation Private Limited v. Erika Yearwood
Case No. D2026-4089

1. The Parties

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

The Respondent is Erika Yearwood, United States of America ("US").

2. The Domain Name and Registrar

The disputed domain name <zohostore.org> is registered with Register.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 11, 2026. On September 11, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same day, 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 (PERFECT PRIVACY, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 14, 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 September 15, 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 21, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 11, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 18, 2026.

The Center appointed Mehmet Polat Kalafatoğlu as the sole panelist in this matter on October 22, 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 leading technology company with over 130 million users around the world. It provides global cloud-based software products and solutions, including private cloud services, sales, marketing, finance, human resources, legal, security and IT management, BI and analytics, project management, and development platforms. The Complainant was founded in 1996 as AdventNet, Inc. In 2004, in the US, it launched its first software under the Zoho brand. In 2009, it was renamed Zoho Corporation Private Limited. It is noted that the Complainant has more than 18,000 employees working in more than 30 offices across 24 jurisdictions, including the US, where the Respondent is located. It is also noted that the Complainant provides its services under the platform named "Zoho Store".

The Complainant submits that it is the owner of multiple trademark registrations for ZOHO and ZOHO CRM in different jurisdictions, including the following trademark registrations:

- The US trademark registration No. 3260807 for ZOHO, registered on July 10, 2007;
- The US trademark registration No. 3487290 for ZOHO (figurative), registered on August 19, 2008; and
- The Indian trademark registration No. 6017128 for ZOHO CRM, with the application date of July 12, 2023.

The Complainant owns and operates numerous domain names incorporating its ZOHO trademark, including the domain names <zoho.us>, <zoho.eu>, and <zoho.com>. Moreover, the Complainant operates the subdomains <store.zoho.com> and <store.zoho.eu> in connection with the Zoho Store.

The disputed domain name was registered on July 20, 2026. At the time of the Complaint and this Decision, it does not resolve to an active website. However, the record shows that it previously resolved to an active website which prominently displayed a logo similar to the Complainant's figurative mark, the Complainant's ZOHO CRM trademark, and, among others, the following message: "We are ZOHO. We are business insights."

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, that the Respondent has no rights or legitimate interests in respect of the disputed domain name, and that the disputed domain name was registered and is being used in bad faith.

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 ZOHO is reproduced within the disputed domain name. Accordingly, the disputed domain name is 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, "store", 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.

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. In this regard, the Panel notes the Complainant's unrefuted statements that the Complainant and the Respondent have never had any previous relationships, nor has the Complainant ever granted the Respondent authorization to use the Complainant's trademarks, including in the disputed domain name. The Panel also notes that nothing in the available record suggests that the Respondent is commonly known by the disputed domain name. In particular, the Panel considers the unrebutted evidence submitted by the Complainant regarding the previous use of the disputed domain name. This evidence shows that the disputed domain name previously resolved to an active website that prominently displayed a logo confusingly similar to the Complainant's figurative mark and prominently displayed the Complainant's ZOHO CRM trademark. Moreover, the Panel notes the confusing similarity between the disputed domain name on the one hand, and the Complainant's subdomains mentioned above and the name "Zoho Store" under which the Complainant offers its services, on the other hand. In the Panel's view, these circumstances indicate that the Respondent used the disputed domain name with the objective to impersonate or to misleadingly suggest an affiliation or connection with the Complainant. The fact that the disputed domain name is currently inactive does not alter the Panel's conclusions under this element.

By failing to submit a Response, 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.

Based on the available record, 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.

In the present case, the Panel notes the following: the Complainant's trademark largely predates the registration of the disputed domain name; the Complainant's trademark is also protected in the US, where the Respondent is located; the composition of the disputed domain name, which incorporates the ZOHO trademark and is highly similar to the Complainant's subdomains and the "Zoho Store" platform; and the previous use of the disputed domain name described above. Accordingly, the Panel finds it very likely that the Respondent was aware of the Complainant's trademark at the time of registering the disputed domain name.

Considering the previous use of the disputed domain name described above, the Panel finds that the Respondent, by using the disputed domain name, has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of its website. The fact that the disputed domain name is currently inactive does not alter the Panel's determinations under this element.

Based on 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 <zohostore.org> be transferred to the Complainant.

/Mehmet Polat Kalafatoğlu/
Mehmet Polat Kalafatoğlu
Sole Panelist
Date: November 5, 2026