ADMINISTRATIVE PANEL DECISION

ChartHop, Inc. v. Shawn Arora, The Arora Group Inc.
Case No. DAI2026-0038

1. The Parties

The Complainant is ChartHop, Inc., United States of America ("United States"), represented by Rome LLP, United States.

The Respondent is Shawn Arora, The Arora Group Inc., Canada, self-represented.

2. The Domain Name and Registrar

The disputed domain name <charthop.ai> is registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 18, 2026. On the following day, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 20, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name that differed from the named Respondent (Redacted for Privacy / Privacy Service Provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on the same day, 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 May 21, 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 June 3, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 23, 2026. The Response was filed with the Center on June 22, 2026. On the following day, the Complainant made a supplemental filing, to which the Respondent objected and made a conditional supplemental filing in reply.

The Center appointed Matthew Kennedy as the sole panelist in this matter on July 1, 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 provides an artificial intelligence ("AI")-powered people operations and human resources platform known as "ChartHop". It uses the CHARTHOP mark for Software-as-a-Service offerings that collect, track, manage, create reports, visualize, and deliver analytics of employee and workforce data in the areas of headcount, organizational structure, employee profiles, compensation, engagement, performance management, data collection, data sharing, collaboration, planning, and communication workflows centered around employee data. The Complainant holds the following trademark registrations for CHARTHOP:

- United States trademark registration number 6966887, registered January 31, 2023, with a claim of first use in commerce in January 2019, specifying services in class 42; and

- United States trademark registration number 8169836, registered March 10, 2026, with claims of first use in commerce in January 2025, specifying goods and services in classes 9 and 42, including software-as-a-service.

The above trademark registrations are current. The Complainant also filed United States trademark application serial number 99067783 for CHARTHOP AI on March 5, 2025, specifying goods and services in classes 9 and 42. That trademark application is currently pending. The Complainant uses the domain name <charthop.com> in connection with a website where it provides information about itself and its ChartHop platform and offers the ChartHop app for download. The page header reads "ChartHop | The HR Platform Built for AI". Customer logos and reviews are displayed. A heading features the tagline "Ask ChartHop AI".

The Respondent is a business operations and finance executive and the principal of LaunchSpark, a technology venture studio. His portfolio of domain names includes <opsflow.ai>, <birdseed.ai>, <microsaas.ai>, and <tokentracker.ai>. LaunchSpark produced a project brief for the disputed domain name, dated September 4, 2025.

The disputed domain name was registered on July 22, 2025. Since at least September 4, 2025, it has resolved to a webpage headed "Welcome to ChartHop.ai", displaying an image of a mountain and the following text: "Visualize and explore your data's journey - from point to point. We create lightweight, AI-augmented chart traversal tools for discovering patterns and transitions across graphs and maps. Coming soon."

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 identical, or at least, confusingly similar, to the Complainant's CHARTHOP trademark.

The Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent is not affiliated with the Complainant, and the Complainant has not authorized, licensed, or otherwise permitted the Respondent to register or use any domain name incorporating the CHARTHOP marks.

The disputed domain name was registered and is being used in bad faith. The disputed domain name was registered in 2025, long after the Complainant had established extensive rights in the CHARTHOP mark. The selection of the ".ai" country code Top-Level Domain ("ccTLD") - commonly associated with artificial intelligence technologies - further demonstrates the Respondent's intent to target the Complainant's business, which is marketed as an AI-driven human resources ("HR") platform. The Respondent had actual or at least inferable knowledge of the Complainant's rights at the time of registration, given the distinctiveness of the CHARTHOP mark, the Complainant's established use since 2019, and the Respondent's use of the disputed domain name in connection with AI-enabled data and visualization tools closely related to the Complainant's services.

In its supplemental filing, the Complainant argues that it had already been publicly using "ChartHop AI" in connection with its AI-powered business-intelligence, workforce-data, and data-visualization functionality for at least four months prior to the registration of the disputed domain name. The Respondent registered the disputed domain name as an exact match with the CHARTHOP mark paired with the ".ai" extension, after the Complainant had publicly branded its own AI offering as "ChartHop AI". The Respondent's materials were created after registration of the disputed domain name and after the Complainant's public ChartHop AI page had existed for months. The Respondent's claimed concept is closely adjacent to, and potentially overlapping with, the Complainant's publicly advertised ChartHop AI offering.

B. Respondent

The Respondent contends that the Complainant has not satisfied all the elements required under the Policy for a transfer of the disputed domain name.

The Respondent concedes that the disputed domain name contains the words "chart" and "hop", but the Complainant does not own a monopoly on the English language. While the string is identical to the Complainant's mark, the Respondent registered the disputed domain name solely for its descriptive utility.

The Respondent has rights and legitimate interests in respect of the disputed domain name. He provides contemporaneous, time-stamped documentary evidence showing an intent to use the disputed domain name for a legitimate business. The LaunchSpark Project Brief, dated September 4, 2025, documented the specific, descriptive etymology of the project prior to any notice of a dispute: "Chart — signifying graphs, maps, or visual data structures" and "Hop — implying movement, jump, or exploration". The public-facing landing page, captured in September 2025, perfectly matches this internal documentation, advertising an "AI-augmented chart traversal tool". The evidence definitively proves that the Respondent's use of the words "chart" and "hop" relates strictly to their literal dictionary definitions in the context of data visualization.

The disputed domain name was not registered and is not being used in bad faith. The Respondent combined "chart" and "hop" to literally describe a data-traversal mechanic. The fact that the Complainant combined the exact same dictionary words for a different application does not establish that the Respondent targeted the Complainant in bad faith. The ".ai" ccTLD is the globally-recognized default for modern software developers. The Respondent registered the disputed domain name because his software utilizes AI, not to target the Complainant. The Respondent's portfolio demonstrates a clear, verifiable pattern of registering descriptive ".ai" domain names for software development. There is zero competitive overlap between the Parties. The Complainant operates exclusively in the human resources and payroll vertical whereas the Respondent was developing a technical data visualization tool. The Respondent acquired the disputed domain name on the open market, built an informational landing page, drafted an internal project brief, and proceeded with his venture studio activities. At no point did the Respondent contact the Complainant, attempt to sell the disputed domain name, or seek to disrupt the Complainant's business.

In its supplemental filing, the Respondent contends that the Complainant's own webpage evidence definitively proves that there is no competitive overlap between its "ChartHop AI" and the Respondent's intended use. There is zero overlap between an enterprise HR assistant and a time-series graph traversal utility. The mere fact that two completely distinct software applications both utilize AI and display charts does not establish competitive overlap. As an executive operating outside the Human Resources industry, the

Respondent's acquisition of the disputed domain name was driven solely by its descriptive utility for a conceptual data-visualization tool - a utility for "hopping" across data "charts" - and not by the Complainant's marketing or product launches. The Complainant's supplemental filing fails to cure the fundamental defects in its initial Complaint.

6. Discussion and Findings

6.1 Procedural Issue: Unsolicited Supplemental Filings

The Complainant made an unsolicited supplemental filing on the day after it received the Response. The Respondent objected immediately and made a conditional supplemental filing in reply, prior to the appointment of the Panel.

The Complainant argues that its supplemental filing is narrowly directed to new factual assertions and evidence raised in the Response, including the asserted descriptive-use rationale, alleged preparations to use the disputed domain name for an AI data-visualization tool, and the assertion that there is no competitive overlap between the Respondent's proposed use and the Complainant's ChartHop AI offering.

The Respondent objects to consideration of the Complainant's supplemental filing. He argues that it introduces no "new" facts that could not have been anticipated. The Complainant, represented by experienced legal counsel, should have fully anticipated that the Respondent would mount a descriptive-use defense. The Complainant's failure to include its March 2025 archived screenshot in the Complaint was a strategic oversight, not an exceptional circumstance justifying a supplemental filing. Allowing this submission would essentially grant the Complainant an impermissible "second bite at the apple". If the Panel accepts the Complainant's supplemental filing, the Respondent has submitted its own supplemental filing in reply.

Paragraph 10(d) of the Rules provides that "the Panel shall determine the admissibility, relevance, materiality and weight of the evidence". Although paragraph 12 of the Rules empowers the Panel, in its sole discretion, to request further statements or documents from either of the Parties, this does not preclude the Panel from accepting unsolicited filings. See *Delikomat Betriebsverpflegung Gesellschaft m.b.H. v. Alexander Lehner,* WIPO Case No. D2001-1447.

In the present case, the Complainant's supplemental filing responds, inter alia, to new factual evidence regarding the Respondent's internal project brief, and arguments regarding the Parties' respective scope of activities, that could not have been reasonably anticipated at the time when the Complaint was filed. The Respondent has taken the opportunity to reply with its own supplemental filing. Both supplemental filings were submitted prior to the appointment of the Panel, and their acceptance will not delay the proceeding.

Therefore, the Panel exercises its discretion to admit both Parties' supplemental filings and will take them into consideration in this decision according to their respective relevance, materiality, and weight, as part of the evidence on the record.

6.2 Substantive Issues

Paragraph 4(a) of the Policy provides that the Complainant must prove each of the following elements:

(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.

The burden of proof of each element is borne by the Complainant.

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. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.7.

The Complainant has shown registered rights in respect of a CHARTHOP trademark for the purposes of the Policy. See WIPO Overview 3.1, section 1.2.1. Given that the Complainant's application for the CHARTHOP AI trademark is still pending, that application, by itself, does not establish rights for the purposes of the Policy. See WIPO Overview 3.1, section 1.1.4.

The entirety of the CHARTHOP mark is reproduced within the disputed domain name. The only additional element is a ccTLD extension (".ai") which, as a standard requirement of domain name registration, may be disregarded in the assessment of identity for the purposes of the first element of the Policy. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. See WIPO Overview 3.1, sections 1.7 and 1.11.1.

Therefore, 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. See WIPO Overview 3.1, section 2.1.

In the present case, the disputed domain name is identical to the Complainant's CHARTHOP mark, which creates a high risk of implied affiliation. The Respondent uses the disputed domain name to resolve to a webpage that displays the disputed domain name and promotes forthcoming software applications, which are of the same broad product type as the Complainant's Software-as-a-Service offerings regardless of whether they would be in a directly competitive relationship. The webpage gives the impression that it or the software applications originate from, or are affiliated with, the Complainant. The Complainant submits that the Respondent is not affiliated with it, and that it has not authorized, licensed, or otherwise permitted the Respondent to register or use any domain name incorporating the CHARTHOP marks. The Panel finds that that these circumstances do not indicate that the Respondent is using the disputed domain name in connection with a bona fide offering of goods or services, nor that he is making a legitimate noncommercial or fair use of the disputed domain name.

Further, the Registrar has verified that the Respondent's name is "Shawn Arora, The Arora Group Inc.", while the Respondent has also indicated that he is the principal of the LaunchSpark venture studio. None of these names resembles the disputed domain name. Nothing on the record indicates that the Respondent has been commonly known by the disputed domain name.

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.

Turning to the Respondent, he submits that he intends to use the disputed domain name for a legitimate business. In support, he presents an internal project brief produced after the registration of the disputed domain name, before receipt of notice of this dispute, and he also refers to the "coming soon" webpage associated with the disputed domain name. This evidence is intended to show that the Respondent's purpose is derived from dictionary meanings of the words in the disputed domain name (i.e., "chart" and "hop"). However, the project brief simply defines those words and identifies a technical problem that they could describe in a software context, while the "coming soon" webpage reflects that description. There is no other sign of pursuit of the project; indeed, the Respondent's other evidence aims to explain the lack of such pursuit due to the pressure of work. Accordingly, the Panel finds this evidence insufficient to establish "demonstrable preparations" to use the disputed domain name in connection with a bona fide offering of goods or services.

The Panel has noted that the Respondent's project brief included a note that the disputed domain name was part of a series of experiments, not a marketing or commercial venture. However, the project brief was prepared by a technology venture studio and headed "Business overview". The Response also confirms that the intention was to use the disputed domain name for a business. Accordingly, this evidence does not demonstrate that the Respondent is making a legitimate noncommercial or fair use of the disputed domain name.

In summary, the Respondent has not rebutted the Complainant's prima facie showing.

Based on the record, the Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel notes that, f or the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith, but these are not an exhaustive list.

In the present case, the disputed domain name was registered in 2025, after the registration of the Complainant's CHARTHOP mark in 2023. The disputed domain name is not a dictionary word or a common phrase, although it contains two dictionary words (i.e., "chart" and "hop"). While that combination of words can be interpreted by analogy with, say, "job-hop" or "island-hop", to connote changing frequently from one chart to another, the only evidence on the record of the use of the combination "charthop" in any sense prior to the registration of the disputed domain name was in the Complainant's name and the trademark for its platform, including on its website. The Complainant's CHARTHOP platform is powered by AI, and the disputed domain name combines the trademark with the ccTLD extension ".ai". The Complainant is a technology startup, and the Respondent operates a technology venture studio.

The Respondent does not clearly deny prior awareness of the Complainant's trademark; he argues that the Complainant does not have universal exclusivity and that he registered the disputed domain name solely because of its descriptive utility, independently. The Respondent cites the UDRP panel decision in *MAILSUITE, S.L. v. Mathias GILSON, Qualtir,* WIPO Case No. D2025-2414, but that case must be distinguished from the present case because there is no evidence of widespread usage of "charthop" or any similar terms by other parties that would prevent an inference that the Respondent had the Complainant in mind when he registered the disputed domain name. For the same reason, the Respondent's portfolio of other domain names in the ".ai" ccTLD, at least three of which refer to software applications, does not explain why the disputed domain name is identical to the CHARTHOP mark. In view of all these circumstances, the Panel finds it more likely than not that the Respondent knew of the Complainant and its CHARTHOP trademark at the time when he registered the disputed domain name.

As regards use, the disputed domain name resolves to a webpage that promotes forthcoming software applications. The description of these products ("AI-augmented chart traversal tools") reflects an interpretation of the words ("chart" and "hop") and the ccTLD extension (".ai") in the disputed domain name. The software applications do not exist. Given the content of the Respondent's project brief and the webpage, it appears more likely than not that the software applications are promoted as a solution to a technical problem conceived to correspond with the disputed domain name containing the Complainant's trademark, and less likely that the technical problem was identified before a decision was made to acquire the disputed domain name, as the Respondent claims. That being so, the Panel finds it more likely that the webpage is a pretext for cybersquatting activity. This is an indication of bad faith.

Therefore, 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 <charthop.ai> be transferred to the Complainant.

/Matthew Kennedy/
Matthew Kennedy
Sole Panelist
Date: July 9, 2026