

## ADMINISTRATIVE PANEL DECISION

Qwoted, Inc. v. Rameez Ghayas Usmani, HAROHelpareporter  
Case No. DIO2025-0051

### 1. The Parties

The Complainant is Qwoted, Inc., United States of America (“United States”), represented by Goodwin Procter LLP, United States.

The Respondent is Rameez Ghayas Usmani, HAROHelpareporter, Pakistan.

### 2. The Domain Name and Registrar(s)

The disputed domain name <qwoted.io> (the “Domain Name”) is registered with NameCheap, Inc. (the “Registrar”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 19, 2025. On November 20, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On November 20, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent and contact information in the Complaint. The Center sent an email communication to the Complainant on November 25, 2025 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 November 25, 2025.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the .IO Domain Name Dispute Resolution Policy (the “Policy”), the Rules for .IO Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for .IO 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 November 27, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 17, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on December 22, 2025. The Center appointed Gregor Vos as the sole panelist in this matter on December 29, 2025. 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 online platform under the name QWOTED, accessible through the domain name <qwoted.com>. The platform, launched in 2018, connects journalists with expert sources and public relations professionals for the purpose of sourcing information and collaborating on media stories.

The Complainant is the owner of the following trademark registrations (hereinafter referred to as: the "Trademarks"):

- United States trademark registration No. 6,046,877 for QWOTED registered on May 5, 2020; and
- United States trademark registration No. 7,633,596 for qwoted registered on December 31, 2024.

The Domain Name was registered on October 25, 2024. At the time of the filing of the Complaint, the Domain Name resolved to a website offering commercial services of the same nature as those offered by the Complainant and displayed the Complainant's Trademarks. At the time of this Decision, the Domain Name remains active and continues to resolve to the same website.

#### **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 Domain Name.

Notably, the Complainant contends that the Domain Name is confusingly similar to the Trademarks of the Complainant, the Respondent has no rights or legitimate interests in the Domain Name, and the Domain Name has been registered and is being used in bad faith.

Firstly, according to the Complainant, the Domain Name is identical or confusingly similar to its Trademarks. The Domain Name incorporates the Trademarks in their entirety, with the mere addition of the country code Top-Level Domain ("ccTLD") ".io". This does not prevent a finding of confusing similarity.

Secondly, the Complainant asserts that the Respondent has no rights or legitimate interests in the Domain Name. The Respondent is not commonly known by the Domain Name or any similar variation. Furthermore, the Complainant has not granted the Respondent any authorization, license or consent to use the Trademarks in the Domain Name or to imply any connection with the Complainant. Moreover, the Respondent has not demonstrated any bona fide use of the Domain Name. Instead, according to the Complainant, the content displayed on the website to which the Domain Name resolves consists of unauthorized copies of materials previously made available by the Complainant, thereby misleading Internet users into believing that the Domain Name is owned by, connected with, or otherwise affiliated with the Complainant.

Finally, the Complainant contends that the Respondent registered and is using the Domain Name in bad faith. According to the Complainant, the Trademarks are well-established in the relevant sector and are clearly associated with the Complainant, such that the registration and use of the Domain Name constitutes bad faith. In addition, the Respondent intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion with the Trademarks as to the source, sponsorship, affiliation, or endorsement of the website and the goods and services offered. Furthermore, the Domain Name has been used in a manner intended to disrupt the Complainant's business by misleading Internet users into believing

that the website is operated by, or affiliated with, the Complainant through the use of the Trademarks and copied content from the Complainant's platform.

## **B. Respondent**

The Respondent did not reply to the Complainant's contentions.

## **6. Discussion and Findings**

For the Complainant to succeed, it must prove, within the meaning of paragraph 4(a) of the Policy and on the balance of probabilities that:

- i. the Domain Name is identical or confusingly similar to a trademark or a service mark in which the Complainant has rights; and
- ii. the Respondent has no rights or legitimate interests in respect of the Domain Name; and
- iii. the Domain Name has been registered or is being used in bad faith.

Only if all three elements have been fulfilled, the Panel is able to grant the remedies requested by the Complainant. The Panel will deal with each of the requirements in turn.

### **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 Trademarks and the Domain Name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the Trademarks is reproduced within the Domain Name. Accordingly, the Domain Name is confusingly similar to the Trademarks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

In general, the addition of the ccTLD ".io" to the Domain Name is viewed as a standard registration requirement and as such disregarded under the first element. [WIPO Overview 3.0](#), 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 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 3.0](#), 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 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 Domain Name such as those enumerated in the Policy or otherwise.

In this case, the Respondent's registration and use of the Domain Name creates a risk of implied affiliation due to the composition of the Domain Name (which fully incorporates the Trademarks) and the content of the website to which the Domain Name resolves. This creates the false impression that it is affiliated with, endorsed by, or authorized by the Complainant. The Panel finds that such use does not constitute legitimate interests under the Policy.

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

### **C. Registered or 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 3.0](#), section 3.2.1.

In the present case, the Panel notes that the registration of one of the Trademarks predates the registration date of the Domain Name. Given that the Domain Name identically incorporates the QWOTED Trademark, the Panel agrees that it is not conceivable that the Respondent registered the Domain Name without knowledge of the Complainant's activities and Trademarks under which the Complainant is doing business. The Panel further notes that the Complainant's Trademarks are used in the website to which the Domain Name resolves, which further supports the Panel's conclusion that the Domain Name is registered and used in bad faith.

Furthermore, the Panel has found that the Respondent lacks any rights or legitimate interests in the Domain Name and that there is no conceivable good-faith use of the Domain Name. Considering this, and given the identical incorporation of the Trademarks in the Domain Name and the references made to the Complainant on the website to which the Domain Name resolves, the Panel finds that the Respondent has intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion as to the affiliation or endorsement of the website.

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 Domain Name <qwoted.io> be transferred to the Complainant.

*/Gregor Vos/*  
**Gregor Vos**  
Sole Panelist  
Date: January 9, 2026