

ADMINISTRATIVE PANEL DECISION

Net Holding A.Ş., Merit Turizm Yatırım ve İşletme A.Ş. v. Georghe Bulai,
3-102-944681 SRL

Case No. DIO2026-0030

1. The Parties

The Complainants are Net Holding A.Ş., Türkiye, and Merit Turizm Yatırım ve İşletme A.Ş., Türkiye, represented by Sołtysiński Kawecki & Szlęzak, Poland.

The Respondent is Georghe Bulai, 3-102-944681 SRL, Costa Rica.

2. The Domain Name and Registrar

The disputed domain name <meritking.io> is registered with NameSilo, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 25, 2026. On June 26, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same date, 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 (User #b34ef1a7 Privacy, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 30, 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 July 5, 2026. On July 10, 2027, the Complainants sent an email communication to the Center regarding a clerical error as to the identity of the Complainants’ listed in the Complaint and amended Complaint.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the .IO Domain Name Dispute Resolution Policy (the “.IO Policy” or “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 July 6, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 26, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 27, 2026.

The Center appointed Pablo A. Palazzi as the sole panelist in this matter on July 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 Complainants are joint stock companies existing under the laws of Türkiye. Net Holding A.Ş. (the “first Complainant”) is a company active in the hospitality, casino, gaming and betting sectors; Merit Turizm Yatırım ve İşletme A.Ş. (the “second Complainant”) is one of its subsidiaries.

The Complainants operate in Türkiye, Cyprus, Montenegro, Croatia, and Bulgaria.

The second Complainant owns figurative MERIT, MERIT INTERNATIONAL, and MERIT ROYAL HOTEL CASINO SPA trademark registrations in Türkiye, including the following trademark registrations:

- Turkish Registration MERIT No. 2022 195277, registered on July 24, 2023, in classes 9, 41, and 42;
- Turkish Registration MERIT INTERNATIONAL No. 171909, registered on June 16, 1997, in classes 39, 41, and 42; and
- Turkish Registration MERIT ROYAL HOTEL CASINO SPA No. 2012 97386, registered on September 9, 2015, in classes 3, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, and 45.

The first Complainant also owns a figurative MERIT ROYAL HOTEL&CASINO&SPA trademark registration in the European Union (No. 016172389), registered on May 24, 2017, in classes 9, 16, 21, 24 28, 33, 35, 36, 37, 38, 40, 41, and 43.

The Complainants have further registered and been operating the trademark MERIT as part of the Complainants’ domain name, <merithotels.com>.

The Complainants have been a party to more than ten Uniform Domain Name Dispute Resolution Policy (“UDRP”) cases involving over 30 domain names

The disputed domain name was registered on July 9, 2024. The disputed domain name is currently, and according to the Complaint, not in use.

5. Parties’ Contentions

A. Complainants

In essence, the Complainants contend as follows:

The disputed domain name is confusingly similar to the Complainants’ trademarks because it incorporates the dominant element “merit”, which is included in the Complainants’ trademarks, whereas the element “king” is not sufficient to prevent a finding of confusion because it is intended to evoke association with the element “royal”, which is incorporated in various trademarks owned by the Complainants.

The Respondent does not have any rights or legitimate interests in the disputed domain name. The Complainants never authorized the Respondent to use their trademarks.

The Respondent has registered the disputed domain name in bad faith because it was aware of the Complainants’ trademarks at the time of registration.

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 Complainants' trademark and the disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions¹ ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainants have shown rights in respect of the trademark MERIT and MERIT-formative trademarks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the mark MERIT 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, such as here "king", may bear on assessment of the second and third elements, the Panel finds the addition of this 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 addition of the Top-Level Domain ("TLD") ".io" in the disputed domain name is a standard registration requirement and as such may be disregarded under the confusing similarity test under the Policy, paragraph 4(a)(i). [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 the .IO Policy 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 3.1](#), section 2.1.

Having reviewed the available record, the Panel finds the Complainants have established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name.

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

¹ In view of the similarities of the .IO Policy with the UDRP, it is well established that cases decided under the .IO Policy may refer to the [WIPO Overview 3.1](#), where relevant.

C. Registered or Used in Bad Faith

Since “.io” is a country code TLD rather than a generic TLD, it is not subject to the UDRP. However, the .IO Policy is in large inspired the UDRP with modifications, the most significant of which is that under the UDRP a complainant must show bad faith registration and bad faith use, whilst under the .IO Policy for a complainant, it is sufficient so far as bad faith is concerned to show bad faith registration or bad faith use.

Under the .IO Policy, the Complainants only need to prove that the disputed domain name was either registered or is being used in bad faith. Standard UDRP requires proving both.

The MERIT trademarks have been registered and used for several years in the hospitality, casino, gaming and betting sectors prior to the registration of the disputed domain name, which occurred in 2024, significantly later than the Complainants’ first Turkish trademark registration in 1997.

A basic Internet search would have readily revealed the existence and commercial use of the MERIT brand, which is distinctive and strongly associated with the Complainants’ hospitality and gaming services.

Further, as previously interpreted in a case brought by the Complainants, the Panel notes that the term “meritking” is conceptually akin to the essential part “merit royal” of the MERIT ROYAL HOTEL CASINO SPA trademarks, as “royal” is a related term to “king” (see *NET Holding A.Ş., Merit Turizm Yatırım ve İşletme A.Ş. v. Kozzle LTD*, WIPO Case No. [D2025-4197](#)).

In the present case, the Panel finds that the Respondent more likely than not was aware of the Complainants’ trademarks at the time of registration of the disputed domain name because it registered the disputed domain name on July 9, 2024, and then a gaming license was requested for the disputed domain name according to the Complainants’ evidence.

According to the Complaint “The disputed Domain Name appears in the register of the so-called ‘Anjouan Gaming Authority’ [...] The AGA issues ‘licenses’ and ‘certificates’ for internet gambling services in the name of Anjouan island in the Union of the Comoros. According to its website ([anjouangaming.com](#)), the AGA is ‘the designated regulatory body responsible for the licensing and supervision of internet gaming operations under the laws of the Autonomous Island of Anjouan’”.

The disputed domain name has not resolved to an active website. In this regard, panels have held that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. In this case, the Panel notes the composition of the disputed domain name and the notoriety of the Complainants’ trademarks. Moreover, the evidence offered by the Complainant is compelling for the Panel to find that the Respondent’s intention was to use the disputed domain name to offer gambling services, same services historically offered by the Complainant under MERIT-formative trademarks.

Under the circumstances of this case, this is evidence of a registration in bad faith.

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 name, <meritking.io> be transferred to the first Complainant.

/Pablo A. Palazzi/

Pablo A. Palazzi

Sole Panelist

Date: August 12, 2026