

ARBITRATION AND MEDIATION CENTER

ADMINISTRATIVE PANEL DECISION

Early Warning Services, LLC v. Contact Privacy Inc. Customer 7151571251 / Zelle Pay, Zelle Pay / Zelle Server, zelle / Zelle Pay, Zelle Pay / Zelle Pay, zelle Pay, Zelle Pay, Zelle Pay, Zelle Pay, Zelle Pay, Zelle Support, Zelle support / Daye Rasheed, Daye Rasheed / Tim Anderson / Zelle Online / Zelle Pay, Zelle / Ellen Blackwell / Medi Sarre / zelle pay, zellepayserviceintl.com / Zelle quick Pay, Zelle quick pay / Zelle Service, Zelle / Zelle Support Case No. D2023-2168

1. The Parties

The Complainant is Early Warning Services, LLC, United States of America ("U.S."), represented by Bryan Cave Leighton Paisner, U.S..

The Respondents are Contact Privacy Inc. Customer 7151571251, Canada; Zelle Pay, Zelle Pay, U.S.; Zelle Server, zelle, Nigeria; Zelle Pay, Zelle Pay, Nigeria; Zelle Pay, zelle, Nigeria; Ivan Batista, Dominican Repubic; Zelle Pay, Nigeria; Zelle Support, Zelle support, Nigeria; Daye Rasheed, Daye Rasheed, U.S.; Tim Anderson, U.S., Zelle Online, U.S.; Zelle Pay, Zelle, U.S.; Ellen Blackwell, U.S.; Medi Sarre, U.S.; zelle pay, zellepayserviceintl.com, U.S.; Zelle quick Pay, Zelle quick pay, Nigeria; Zelle Service, Zelle, Nigeria; Zelle Support, Nigeria ("the Respondent").

2. The Domain Names and Registrar

The disputed domain names <noreplyzelle.com>, <notificationzelleserver.com>, <notificatiozellebank.com>,

- <zelleapp.biz>, <zelleauthorization.com>, <zellebanksupport.net>, <zellebanksupport.org>,
- <zellebusinessaccountverification.com>, <zellebusinessbank.net>, <zellebusinesssupport.com>,
- <zellebusinessupgrade.com>, <zellecustomerbusiness.org>, <zellecustomerservicealert.com>,
- <zellecustomerservices.net>, <zellehelpcenter.net>, <zellenotifications.com>,
- <zellenotificationservice.com>, <zelleonlinecustomerservice.com>, <zellepayalertemail.com>,
- <zelle-pay.app>, <zellepaybankingsever.com>, <zellepaybusinessaccount.com>,
- <zellepaycustomerservicebankapp.net>, <zellepaye-mail.org>, <zellepayin.com>, <zellepaymentmail.com>,
- <zellepaymentonlineservice.com>, <zellepaynotice.com>, <zellepayonlineemail.com>, <zelle-pay.org>,
- <zellepayra.com>, <zellepayreceive.com>, <zellepayreferencecustomerbankapp.net>,
- <zellepayreferencesupport.net>, <zellepay-secure.com>, <zellepay-secure.one>, <zellepayserviceintl.com>,
- <zellepayservicesupport.com>, <zellepaysupportinc.com>, <zellepaysupports.org>,
- <zellepreferencesupport.com>, <zellepremiumbusinesspayment.com>, <zellequickpayservice.com>,
- <zellerepayment.net>, <zellesalary.com>, <zellesupport.chat>, <zellesupportpay.info>, <zellesupport.team> and <zellework.com> are registered with Google LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 16, 2023. On May 17, 2023, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On May 18, 2023, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names, which differed from the named Respondent (Contact Privacy Inc. Customer 7151571251) and contact information in the Complaint.

The Center sent an email communication to the Complainant on May 24, 2023 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 May 26, 2023.

On June 1, 2023, the Center sent an email communication to the Complainant indicating that the language of the registration agreement for the disputed domain name <zelleauthorization.com> is Spanish, and, on June 2, 2023, the Complainant submitted a request for English to be the language of the administrative proceedings with regard to all the disputed domain names.

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 June 12, 2023. In accordance with the Rules, paragraph 5, the due date for Response was July 2, 2023.

On June 29, 2023, the registrant of the domain name <zellenz.com> (initially included in the Complaint) filed a response in relation to this domain name, and, on June 30, 2023, the Complainant withdraw the Complaint in relation to this domain name only.

The Respondent did not submit any response. Accordingly, the Center notified the Commencement of Panel Appointment Process on July 3, 2023.

The Center appointed Reyes Campello Estebaranz as the sole panelist in this matter on July 7, 2023. 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 U.S. company operating under the brands ZELLE and ZELLEPAY a digital payment network, which enables people and businesses to transfer money between bank accounts. More than 1,800 financial institutions worldwide use the Complainant's services. The Complainant is present on the Internet, being "www.zelle.com" and "www.zellepay.com" its primary websites, where it promotes its money transfer services, and it operates through the websites and mobile computer applications of participating banks or other financial institutions, as well as through its own mobile computer application.

The Complainant holds numerous trademark registrations for the brands ZELLE, ZELLEPAY and variations thereof, including U.S. Registration No. 5,277,307, ZELLE, word, registered on August 29, 2017, in class 36; and U.S. Registration No. 5,938,276, ZELLEPAY, word, registered on December 17, 2019, also in class 36.

The reputation in the field of digital payments of the ZELL and ZELLEPAY marks has been recognized by various prior decisions under the Policy.¹

The Complainant further owns numerous domain names incorporating its brands, including <zelle.com> (registered on June 25, 1994) and <zellepay.com> (registered on March 8, 2016).²

The disputed domain names were registered on the following dates:

Disputed Domain Names	Registration Dates
<noreplyzelle.com></noreplyzelle.com>	November 10, 2022
<notificationzelleserver.com></notificationzelleserver.com>	November 8, 2022
<notificatiozellebank.com></notificatiozellebank.com>	November 9, 2022
<zelleapp.biz></zelleapp.biz>	November 8, 2022
<zelleauthorization.com></zelleauthorization.com>	November 5, 2022
<zellebanksupport.net></zellebanksupport.net>	November 10, 2022
<zellebanksupport.org></zellebanksupport.org>	November 10, 2022
<zellebusinessaccountverification.com></zellebusinessaccountverification.com>	November 8, 2022
<zellebusinessbank.net></zellebusinessbank.net>	November 1, 2022
<zellebusinesssupport.com></zellebusinesssupport.com>	November 1, 2022
<zellebusinessupgrade.com></zellebusinessupgrade.com>	November 10, 2022
<zellecustomerbusiness.org></zellecustomerbusiness.org>	October 31, 2022
<zellecustomerservicealert.com></zellecustomerservicealert.com>	November 20, 2022
<zellecustomerservices.net></zellecustomerservices.net>	November 6, 2022
<zellehelpcenter.net></zellehelpcenter.net>	November 9, 2022
<zellenotifications.com></zellenotifications.com>	November 1, 2022
<zellenotificationservice.com></zellenotificationservice.com>	November 8, 2022
<zelleonlinecustomerservice.com></zelleonlinecustomerservice.com>	November 6, 2022
<zelle-pay.app></zelle-pay.app>	October 28, 2022
<zelle-pay.org></zelle-pay.org>	October 30, 2022
<zellepayalertemail.com></zellepayalertemail.com>	October 31, 2022
<zellepaybankingsever.com></zellepaybankingsever.com>	November 2, 2022
<zellepaybusinessaccount.com></zellepaybusinessaccount.com>	October 28, 2022
<zellepaycustomerservicebankapp.net></zellepaycustomerservicebankapp.net>	October 31, 2022
<zellepaye-mail.org></zellepaye-mail.org>	October 30, 2022
<zellepayin.com></zellepayin.com>	November 3, 2022
<zellepaymentmail.com></zellepaymentmail.com>	October 30, 2022
<zellepaymentonlineservice.com></zellepaymentonlineservice.com>	October 25, 2022
<zellepaynotice.com></zellepaynotice.com>	November 5, 2022
<zellepayonlineemail.com></zellepayonlineemail.com>	October 30, 2022
<zellepayra.com></zellepayra.com>	November 10, 2022

¹ See, e.g., Early Warning Services, LLC v. Privacy service provided by Withheld for Privacy ehf / Zeller Trappa, Cheap Toolie, Ken Zoe, and Jason Bourne, WIPO Case No. D2021-2846; and Early Warning Services, LLC v. Zelle Support; Zellepay Info, Zellepay; Secured payment, Secured payment; ZELLE PAY; Mirandez Chocho, Zelle; ZELLE PAY, ZELLE PAY; Zelle Online, Zelle; Zelle Support, Zelle; Zelle Support; Zelle Pay, Zelle pay; Zelle Pay, Zelle Pay; Zelle Pay, Zelle Pay; Zelle Pay, Zelle Pay,

² Other domain names owned by the Complainant cited in the Complaint are: <zellepayment.com>, <zellepayments.com>, <zellepay.net>, <zellepay.cash>, <zellepay.money>, <zelle.info>, <zelle.co>, <zelle.finance>, and <zelle.credit>.

<zellepayreceive.com></zellepayreceive.com>	October 25, 2022
<zellepayreferencecustomerbankapp.net></zellepayreferencecustomerbankapp.net>	October 25, 2022
<zellepayreferencesupport.net></zellepayreferencesupport.net>	November 18, 2022
<zellepay-secure.com></zellepay-secure.com>	October 28, 2022
<zellepay-secure.one></zellepay-secure.one>	November 11, 2022
<zellepayserviceintl.com></zellepayserviceintl.com>	November 5, 2022
<zellepayservicesupport.com></zellepayservicesupport.com>	November 11, 2022
<zellepaysupportinc.com></zellepaysupportinc.com>	November 10, 2022
<zellepaysupports.org></zellepaysupports.org>	November 12, 2022
<zellepreferencesupport.com></zellepreferencesupport.com>	November 11, 2022
<zellepremiumbusinesspayment.com></zellepremiumbusinesspayment.com>	November 2, 2022
<zellequickpayservice.com></zellequickpayservice.com>	October 27, 2022
<zellerepayment.net></zellerepayment.net>	November 8, 2022
<zellesalary.com></zellesalary.com>	October 25, 2022
<zellesupport.chat></zellesupport.chat>	November 2, 2022
<zellesupport.team></zellesupport.team>	November 2, 2022
<zellesupportpay.info></zellesupportpay.info>	November 11, 2022
<zellework.com></zellework.com>	November 7, 2022

All the disputed domain names are apparently inactive, resolving to Internet browser error messages.

5. Parties' Contentions

A. Complainant

Key contentions of the Complaint may be summarized as follows:

The ZELLE and ZELLEPAY marks are well-known, as it has been recognized by various prior decisions under the Policy.

The disputed domain names are confusingly similar to the Complainant's trademarks. The disputed domain names wholly incorporate the marks ZELL and/or ZELLEPAY adding various terms such as "pay", "bank", "business", "support", "service", "payment", "secure", "account", or "online" that enhance the confusion because these terms are descriptive and commonly used in the financial industry in which the Complainant operates. The Complainant's trademarks are recognizable within the disputed domain names.

The Respondent has no legitimate rights or interests in the disputed domain names. The Respondent is not commonly known by the terms included in the disputed domain names, has no registration for any tradenames, corporations, or trademarks including the terms "zelle" or "zellepay", and no authorization to use the Complainant's trademarks. The Parties have no relationship, and the Respondent is not making any legitimate non-commercial use of the disputed domain names. The Respondent is illegally trading upon the Complainant's goodwill to confuse, mislead, deceive and divert customers, and intentionally tarnish and dilutes the Complainant's valuable and well-known trademarks.

The disputed domain names were registered and are being used in bad faith. The Respondent registered the disputed domain names years after the Complainant began using its trademarks ZELL and ZELLEPAY, when these marks were already well known. The disputed domain name were designed to trade on the reputation and goodwill of the Complainant and its trademarks for financial gain. The passive holding of the disputed domain names and the lack of legitimate rights or interests in the Respondent indicates bad faith. The Respondent is a serial cybersquatter that shows a pattern of bad faith in registering domain names that

target the Complainant's trademarks. The same Respondent registered another 46 domain names incorporating the Complainant's trademarks that were transferred to the Complainant in a prior decision.³

The Complainant has cited previous decisions under the Policy and various sections of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("<u>WIPO Overview 3.0</u>") that it considers supportive of its position, and requests the transfer of the disputed domain names.

B. Respondent

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

6. Discussion and Findings

The Complainant has made the relevant assertions as required by the Policy and the dispute is properly within the scope of the Policy. The Panel has authority to decide the dispute examining the three elements in paragraph 4(a) of the Policy, taking into consideration all of the relevant evidence, annexed material and allegations, and performing some limited independent research under the general powers of the Panel articulated, *inter alia*, in paragraph 10 of the Rules.

A. Preliminary Issues: Language of the Proceedings and Complaint Consolidated against Multiple Respondents

According to paragraph 11(a) of the Rules, unless otherwise agreed by the Parties, or specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement, subject to the authority of the Panel to determine otherwise, having regard to the circumstances of the administrative proceeding.

Paragraph 10(e) of the UDRP Rules grants the Panel the power to consolidate multiple domain name disputes, and paragraph 3(c) of the UDRP Rules provides that a complaint may relate to more than one domain name if the same holder registers the domain names.

The Panel considers that, although the language of the registration agreement of one of the disputed domain names (<zelleauthorization.com>) is Spanish, the circumstances of the case show that all the disputed domain names are subject to a common control. These circumstances include *inter alia*: (i) the registration of all disputed domain names with the same Registrar; (ii) within a short period of time (between October 25, 2022 and November 20, 2022); (iii) the similar composition of all the disputed domain names (incorporating the ZELLE and/or ZELLEPAY marks and adding commonly used terms in the financial industry or in the customer services jargon); (iv) the use in all the disputed domain names of English terms; (v) the identical lack of use of all the disputed domain names; and (vi) the use of the same Registrar's customer number in all the disputed domain names (Customer 7151571251).

The Panel therefore considers that all the disputed domain names are subject to common control, and that the use of the English language as the language of the proceedings, as well as the consolidation, are procedurally efficient, as well as fair and equitable to the Parties. See sections 4.5 and 4.11.2, <u>WIPO</u>

Overview 3.0.

³ Early Warning Services, LLC v. Zelle Support; Zellepay Info, Zellepay; Secured payment, Secured payment; ZELLE PAY; Mirandez Chocho, Zelle; ZELLE PAY, ZELLE PAY; Zelle Online, Zelle; Zelle Support, Zelle; Zelle Support; Zelle Pay, Zelle Pay, Zelle pay; Zelle Support, Zelle; Zelle Pay, Zelle P

B. Identical or Confusingly Similar

The Complainant indisputably has rights in the ZELLE and ZELLEPAY marks, both by virtue of its trademark registrations and its use of these marks in the market.

All the disputed domain names incorporate the ZELLE mark in its entirety, and some of the disputed domain names incorporate the ZELLEPAY mark. In all the disputed domain names, these trademarks are followed or preceded by dictionary commonly used terms in the customer support services and/or in the financial industry (such as "support", "service", "alert email", "e-mail", "notification", "notice", "no reply", "customer", "upgrade", "epayment", "payment", "payment online service", "pay service", "bank", "business account verification", "bank app", "banking server", "quick", "secure", "work", "salary", or "mail"), and/or business identifiers and commonly used acronyms (such as " "inc", or "intl"), and, various disputed domain names include hyphens to separate some of these terms.

The first element of the Policy functions as a standing (or threshold) requirement. The Complainant's trademarks ZELLE and/or ZELLEPAY are recognizable in each of the disputed domain names, and the generic Top-Level Domains ".com", ".biz", ".net", ".org", ".app", ".one", ".chat", ".team", ".info" are a technical requirement, generally disregarded for the purpose of the analysis of the confusing similarity. See sections 1.7, 1.8, and 1.11 of the WIPO Overview 3.0.

Accordingly, the Panel finds that the disputed domain names are confusingly similar to the Complainant's trademarks, and the first element of the Policy under paragraph 4(a)(i) has been satisfied.

C. Rights or Legitimate Interests

The Complainant's assertions and evidence effectively shift the burden to the Respondent of producing evidence of rights or legitimate interests in the disputed domain names (providing the circumstances of paragraph 4(c) of the Policy, without limitation), in order to rebut the Complainant's *prima facie* case. See section 2.1, <u>WIPO Overview 3.0</u>.

However, the Respondent has not replied to the Complainant's contentions, not providing any explanation and evidence of rights or legitimate interests in the disputed domain names.

The applicable standard of proof in UDRP cases is the "balance of probabilities" or "preponderance of the evidence", being the Panel prepared to draw certain inferences in light of the particular facts and circumstances of the case. See section 4.2, WIPO Overview 3.0.

The Panel notes that the term "zelle" is not an English term, but in any case, a German word that can be translated as "cell". The disputed domain names are not used in any sense and consist of the term "zelle" along with other English terms descriptive of the Complainant's services, reinforcing an affiliation to the Complainant as opposed to any German dictionary sense of the term.

The Panel further considers that the Complainant has constructed a strong *prima facie* case evidencing that the Respondent is neither commonly known nor holds any intellectual property rights over the terms "zelle", and/or "zellepay", has not been authorized to use the Complainant's trademarks, and there is no relationship between the Parties.

The Panel has further corroborated that none of the disputed domain names have resolved to an active website, all being apparently inactive resolving to Internet browser error messages.

The Panel further finds that disputed domain names generate an affiliation with the Complainant and its trademarks. The fact that the disputed domain names incorporate the ZELLE mark (and some of them the ZELLEPAY mark), adding terms related to customer support services and/or the financial industry in which the Complainant operates, generates an implied affiliation that suggests that the disputed domain names may be owned or sponsored by the Complainant, or one of its banking associates. A core factor in

assessing fair use of a domain name is that it does not falsely suggest affiliation with the Complainant's trademarks. See section 2.5, <u>WIPO Overview 3.0</u>.

Due to the sector in which the Complainant operates, and the composition of the disputed domain names, the Panel further considers there is a serious threat disputed domain names could be used to impersonate the Complainant and its support services in any type of phishing scam or other type of fraud, which can never confer rights or legitimate interests. See section 2.13, <u>WIPO Overview 3.0</u>.

In this respect, it is further remarkable that the Respondent has chosen not to reply to the Complaint, not providing any evidence of any rights or legitimate interests in the disputed domain names, and, according to the Registrar verifications for all the disputed domain name, the Respondent has provided various different names and contact details that seem erroneous or incomplete.

Therefore, the circumstances of this case lead the Panel to conclude that nothing in the case file gives any reason to believe that the Respondent has any rights or legitimate interests in respect of the disputed domain names, and the second element of the Policy under paragraph 4(a)(ii) has been established.

D. Registered and Used in Bad Faith

The Policy, paragraph 4(a)(iii), requires that the Complainant establishes that the disputed domain names have been registered and are being used in bad faith.

The applicable standard of proof is, likewise, the "balance of probabilities" or "preponderance of the evidence", being the Panel prepared to draw certain inferences in light of the particular facts and circumstances of the case. See section 4.2, WIPO Overview 3.0.

The Panel considers that all cumulative circumstances of this case point to bad faith registration and use of the disputed domain names:

- the ZELLE and ZELLEPAY marks are reputed in the financial sector and the field of digital payments, particularly in the U.S. where the Complainant is located, and these trademarks have strong presence over the Internet, so that any search over the Internet reveals the Complainant and its trademarks;
- (ii) the high number of the disputed domain names (49), all following a similar composition, incorporating the ZELLE and/or ZELLEPAY marks together with terms commonly used in the same industry where the Complainant operates, generating an implied affiliation and risk of confusion;
- (iii) all of the 49 disputed domain names are apparently inactive, resolving to Internet browser error messages; and
- (iv) the Respondent has not offered any explanation of any rights or legitimate interests in the disputed domain names, and has not come forward to deny the Complainant's assertions of bad faith, choosing not to reply to the Complaint.

The Panel has further corroborated that, according to the Complainant's allegations, the same Registrar's customer number (Customer 7151571251) used to register the disputed domain names, was used for the registration of other 46 domain names incorporating the ZELLE and/or ZELLEPAY marks, which were transferred to the Complainant in a prior decision under the Policy.⁴ These circumstances, in the Panel's

⁴ Early Warning Services, LLC v. Zelle Support; Zellepay Info, Zellepay; Secured payment, Secured payment; ZELLE PAY; Mirandez Chocho, Zelle; ZELLE PAY, ZELLE PAY; Zelle Online, Zelle; Zelle Support, Zelle; Zelle Support; Zelle Pay, Zelle Pay, Zelle pay; Zelle Support, Zelle; Zelle Pay, Zelle Payment, Zellepaymentreview; Time Nodey, Proke; BRET LAFELLETTE; and Customer Service, Customer service, supra.

view, reveal a pattern of abuse conduct in the Respondent targeting the Complainant's trademarks ZELLE and ZELLEPAY in bad faith with the registration of at least 95 domain names. See section 3.1.2, <u>WIPO</u> Overview 3.0.

It is further remarkable that the non-use or passive holding of the disputed domain names does not prevent a finding of bad faith. See section 3.3, WIPO Overview 3.0.

Therefore, on the balance of probabilities, taking into consideration all cumulative circumstances of this case, the Panel considers that the disputed domain names were registered targeting the Complainant's reputed trademarks in bad faith, in an effort to take unfair advantage of their reputation by creating a false affiliation to these brands, which constitutes bad faith under the Policy.

Due to the financial sector where the Complainant operates, and the composition of the disputed domain names, the Panel finds that the disputed domain names may have been designed or intended to be used in any type of fraud or phishing scheme, which further indicates bad faith. See section 3.4, <u>WIPO Overview</u> 3.0.

All of the above-mentioned circumstances lead the Panel to conclude that the disputed domain names were registered and used in bad faith. Accordingly, the Panel concludes that the Complainant has met its burden of establishing that the Respondent registered and used the disputed domain names in bad faith under 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 names, <noreplyzelle.com>, <notificationzelleserver.com>, <notificationzelleserver.com>, <notificatiozellebank.com>, <zelleapp.biz>, <zelleauthorization.com>, <zellebanksupport.net>, <zellebanksupport.org>, <zellebusinessaccountverification.com>, <zellebusinessbank.net>, <zellebusinesssupport.com>, <zellebusinessupgrade.com>, <zellecustomerbusiness.org>, <zellecustomerservicealert.com>, <zellecustomerservices.net>, <zellehelpcenter.net>, <zellenotifications.com>, <zellenotificationservice.com>, <zellepaybankingsever.com>, <zellepaybusinessaccount.com>, <zellepayalertemail.com>, <zellepaybusinessaccount.com>, <zellepaycustomerservicebankapp.net>, <zellepaye-mail.org>, <zellepayin.com>, <zellepaymentmail.com>, <zellepaymentmail.com>, <zellepaynotice.com>, <zellepayonlineemail.com>, <zellepay.org>, <zellepayra.com>, <zellepayreferencesustomerbankapp.net>, <zellepayreferencesustomerbankapp.net>, <zellepayreferencesustomerbankapp.net>, <zellepayreferencesustomerbankapp.net>, <zellepayserviceintl.com>, <zellepayserviceintl.com>, <zellepayservicesustom>, <zelle

<zellepreferencesupport.com>, <zellepremiumbusinesspayment.com>, <zellequickpayservice.com>,

<zellerepayment.net>, <zellesalary.com>, <zellesupport.chat>, <zellesupportpay.info>, <zellesupport.team>

/Reyes Campello Estebaranz/ Reyes Campello Estebaranz Sole Panelist

and <zellework.com> be transferred to the Complainant.

Date: July 19, 2023