



CANADIAN INTERNATIONAL INTERNET DISPUTE RESOLUTION CENTRE

DOMAIN NAME DISPUTE

ADMINISTRATIVE PANEL DECISION

CIIDRC case number:	26664-CDRP	Decision date: April 13, 2026
Disputed Domain Names:	<support-koho.ca>, <help-koho.ca>, and <disputes-koho.ca>	
Panel:	María Alejandra López García	
Complainant:	KOHO Financial Inc.	
Represented by:	PROTAKEDOWN PTE. LTD (PhishFort)	
Registrant:	Jack Mehoff, Smith Tech Incorporated	

1. PROCEDURAL HISTORY

This matter is conducted pursuant to the Canadian Dispute Resolution Policy (the CDRP) and the Canadian Dispute Resolution Rules (the Resolution Rules) of the Canadian Internet Registry Authority (“CIRA”).

The procedural history of this case was set out in a letter from the CANADIAN INTERNATIONAL INTERNET DISPUTE RESOLUTION CENTRE (the “CIIDRC”) to the Panel, as follows:

1. On February 26, 2026, the Complainant filed a Complaint in respect of the following disputed domain names <support-koho.ca>; <help-koho.ca>; <web-koho.ca>; <disputes-koho.ca>, with the CIIDRC pursuant to the CDRP, and the Resolution Rules.
2. On February 26, 2026, CIRA was notified of this proceeding. On the same date, CIRA transmitted to CIIDRC by email its verification response, informing about the Registrant(s), for the following disputed domain names: <support-koho.ca>, <help-koho.ca>, and <disputes-koho.ca> being Jack Mehoff, organization Smith Tech Incorporated; and for the disputed domain name <web-koho.ca> being Jason Jacurl (the “Registrant”) and providing their contact details. CIRA also confirmed that the disputed domain names were placed on a Registrar LOCK.

3. On March 3, 2026, CIIDRC sent an email communication to the Complainant, providing the registrants and contact information disclosed by CIRA, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on March 10, 2026. In accordance with paragraph 3.4 of the Resolution Rules, concerning the disputed domain name <web-koho.ca>, the Complainant filed a separate Complaint.

4. On March 11, 2026, CIIDRC, as Service Provider, confirmed compliance of the Complaint with CIRA's requirements under paragraph 3.2 of the Resolution Rules and commencement of the dispute resolution process.

5. Pursuant to paragraph 4.4 of the Resolution Rules, CIIDRC notified the Registrant of this administrative proceeding and forwarded a Notification of Commencement of Proceedings to the Complainant and to the Registrant via email on March 11, 2026.

6. The Registrant failed to file its response by the due date of March 31, 2026. Accordingly, CIIDRC on April 1, 2026, notified the Respondent Default.

7. The Complainant in this administrative proceeding has elected for a Panel consisting of a single member. According to paragraph 6 of the Resolution Rules, after clearing for any potential conflicts, CIIDRC appointed María Alejandra López García as a single-member Panel in this matter on April 8, 2026.

2. FACTS ALLEGED BY THE PARTIES

The Complainant is a Canadian fintech company founded in Vancouver, British Columbia, in 2014 and moved to Toronto, Ontario, in 2017. The Complainant is considered a neobank and provides financial services through its own Platform and Mobile App, including Hybrid Spending and Savings Accounts, Credit Building Tools, Borrowing and Cash Flow, and International Services, among others. The Complainant has established alliances with companies such as Peoples Trust, Mastercard, Manzil, and Canada Post.

In April 2015, the Complainant won the Nasdaq FinTech Innovation Award for Best Financial Technology Company at the NY TechDay. The Complainant was recognized for its goal to disrupt the Canadian banking sector by decoupling the consumer banking experience from traditional banks.

The Complainant owns the following trademark registered rights:

- Canadian trademark for KOHO (word mark), Reg. No. TMA1077262, in International Classes 9 and 36; registered on April 24, 2020; used in Canada since November 2014.

The Complainant also claimed unregistered trademark rights over the term KOHO since November 2014.

The Complainant also owns the domain name <koho.ca> registered on October 10, 2014.

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The disputed domain names <support-koho.ca>, registered on April 19, 2025; <help-koho.ca>, registered on August 25, 2025; and <disputes-koho.ca>, registered on September 8, 2025 (hereinafter the “disputed domain names”). According to the Complainant’s submissions, the disputed domain names were used for fraud purposes, including phishing activities. By the time of this Decision, the disputed domain names resolved to an inactive website with no content at all.

3. CONTENTIONS OF THE PARTIES

- **Complainant**

The Complainant contends that the disputed domain names incorporate the entirety of the Complainant’s distinctive KOHO, that the addition of generic or descriptive terms (“support”, “help” and “disputes”) does not diminish the confusing similarity, and instead reinforces the association with the Complainant’s customer assistance, online services, and dispute resolution functions; that the confusing similarity is further heightened by the fact that KOHO operates legitimate services at nearly identical domain names; that KOHO’s official help centre is located at <help.koho.ca>, making the fraudulent <help-koho.ca> so nearly resemble the Complainant’s legitimate domain as to be likely to be mistaken for it; that the unauthorized display of KOHO’s registered design mark materially increases the likelihood of confusion and falsely suggests affiliation, sponsorship, or authorization by the Complainant.

The Complainant contends that the Registrant has no legitimate interest in the disputed domain names, given that none of the examples described in paragraph 3.4 of the CDRP has been complied by the Registrant; that the Complainant has never licensed or otherwise permitted the Registrant to use its KOHO trademark alone or in conjunction with additional terms; that none of the disputed domain names were being used for any legitimate commercial or non-commercial purpose; that the disputed domain names <support-koho.ca> and <help-koho.ca> were actively used for fraudulent purposes, while <disputes-koho.ca> appears to have been registered as part of the same fraudulent scheme.

The Complainant contends that the Registrant registered the disputed domain names primarily for the purpose of disrupting KOHO’s business pursuant to paragraph 3.5(c) of the CDRP, in particular given that the coordinated attack involving the disputed domain names resulted in compromised customer accounts, financial losses to KOHO customers, virtual and physical card accounts requiring cancellation and re-issuance, precautionary security measures affecting user accounts, and reputational harm to KOHO’s brand and customer trust.

The Complainant contends that the Registrant registered the disputed domain names primarily for the purpose of disrupting KOHO’s business pursuant to paragraph 3.5(c) of the CDRP. In this case, the Registrant has coordinated an online attack that has caused financial and operational damage, including compromised accounts, customer financial losses, and the need to cancel/re-issue cards; security and brand impact, including forced security restrictions on user accounts, and significant damage to KOHO’s reputation and brand trust.

Additionally, the Complainant contends that the Registrant has targeted the Complainant's trademark, and has intentionally attempted to attract Internet users to fraudulent websites by creating a likelihood of confusion with KOHO's trademark pursuant to paragraph 3.5(d) of the CDRP; according to the evidence, the Registrant has obtained commercial gain through: a) theft from KOHO customers via unauthorized fund transfers; b) harvesting of valuable personal information, including Social Insurance Numbers, government-issued identification, and banking credentials; c) operating admin panels to collect and organize stolen data. The Complainant further contends that the registration of multiple similar domain names, as part of a coordinated attack, demonstrates a pattern of bad-faith registrations designed to maximize confusion and create fraudulent opportunities.

- **Registrant**

The Registrant did not reply to any of the Complainant's contentions.

- **Remedy Sought**

The Complainant requests that the disputed domain names be transferred to it.

4. DISCUSSION AND FINDINGS

4.1 Eligibility

Paragraph 2 of CIRA Canadian Presence Requirements for Registrants, Version 1.3, establishes that:

“On and after November 8, 2000, only the following individuals and entities will be permitted to apply to CIRA (through a CIRA certified registrar) for the registration of, and to hold and maintain the registration of, a .ca domain name:

2. Corporation. A corporation under the laws of Canada or any province or territory of Canada;

17. Trade-mark registered in Canada. A Person which does not meet any of the foregoing conditions, but which is the owner of a trade-mark which is the subject of a registration under the Trade-marks Act (Canada) R.S.C. 1985, c.T-13 as amended from time to time, but in this case such permission is limited to an application to register a .ca domain name consisting of or including the exact word component of that registered trade-mark. (...).”

In the present case, the Complainant has provided sufficient evidence that it owns a Canadian corporation and a Canadian trademark, i.e., for KOHO (word mark), Reg. No. TMA1077262, exact word component that is reproduced within the disputed domain names.

Therefore, the Complainant satisfies the Canadian Presence Requirements under section 1.4 of the CDRP.

4.2 Requirements

In accordance with paragraph 4.1 of the CDRP, the onus is on the Complainant to prove:

(a) the Registrant's dot-ca domain name is Confusingly Similar to a Mark in which the Complainant had Rights prior to the date of registration of the domain name and continues to have such Rights; and

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(b) the Registrant has registered the domain name in bad faith as described in paragraph 3.5;

and the Complainant must provide some evidence that:

(c) the Registrant has no legitimate interest in the domain name as described in paragraph 3.4. Once that is done, the onus shifts to the Registrant to prove, on a balance of probabilities, that the Registrant has a legitimate interest in the Domain Name as described in paragraph 3.4 of the CDRP.

The Panel will consider each of these requirements in turn.

4.3 Analysis

4.3.1 Confusingly Similar

The Complainant has proved trademark Rights over the term KOHO in Canada, registered since April 24, 2020. The Panel, based on paragraph 9. a) and d) of the CDRP and considering section 4.8 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions (“WIPO Overview 3.1”)¹, notes that the Complainant claimed unregistered trademark Rights over the term KOHO since 2014. The Panel, having reviewed the records, has been persuaded of such claim. Therefore, the Panel finds that the Complainant owns prior Rights to the date of registration of each of the disputed domain names.

The Complainant’s trademark KOHO is recognizable in the disputed domain names; the mere addition of the terms “support”, “help”, and “disputes” does not prevent a finding of confusing similarity between the disputed domain names and the Complainant’s trademark for the purposes of the CDRP. According to paragraph 3.3 of the CDRP, “in determining whether a domain name is “Confusingly Similar” to a Mark, the Panel shall only consider whether the domain name so nearly resembles the Mark in appearance, sound or the ideas suggested by the Mark as to be likely to be mistaken for the Mark”. (see *Guess IP Holder L.P. v Mike Jones*, 22307-CDRP and *Ontario Lottery and Gaming Corporation v. Adina Danila*, 26531-CDRP).

As paragraph 1.2 of the CDRP defines, the country code top-level domain (ccTLD) ‘.ca’, for the purpose of this proceeding, is excluded.

By applying the .CA test, the Panel finds that the disputed domain names are confusingly similar to the Complainant’s KOHO Trademark.

Therefore, the Complainant has satisfied paragraph 4.1(a) of the CDRP requirement.

4.3.2 Bad Faith Registration

¹ Paragraph 3.2 (l) of the Resolution Rules expressly allows references to “dispute resolution proceedings which apply to domain names registered under any other top-level domain which the Complainant considers persuasive.”

According to paragraph 3.5 of the CDRP, for the purposes of paragraphs 3.1(c) and 4.1(b), any of the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence that a Registrant has registered a domain name in bad faith:

- a. the Registrant registered the domain name, or acquired the Registration, primarily for the purpose of selling, renting, licensing or otherwise transferring the Registration to the Complainant, or the Complainant's licensor or licensee of the Mark, or to a competitor of the Complainant or the licensee or licensor for valuable consideration in excess of the Registrant's actual costs in registering the domain name, or acquiring the Registration;
- b. the Registrant registered the domain name or acquired the Registration in order to prevent the Complainant, or the Complainant's licensor or licensee of the Mark, from registering the Mark as a domain name, provided that the Registrant, alone or in concert with one or more additional persons has engaged in a pattern of registering domain names in order to prevent persons who have Rights in Marks from registering the Marks as domain names;
- c. the Registrant registered the domain name or acquired the Registration primarily for the purpose of disrupting the business of the Complainant, or the Complainant's licensor or licensee of the Mark, who is a competitor of the Registrant; or
- d. the Registrant has intentionally attempted to attract, for commercial gain, Internet users to the Registrant's website or other on-line location, by creating a likelihood of confusion with the Complainant's Mark as to the source, sponsorship, affiliation, or endorsement of the Registrant's website or location or of a product or service on the Registrant's website or location.

Although by the time of this Decision, the disputed domain names resolve to inactive websites, the Complainant has provided sufficient evidence that the disputed domain names have been registered with the Complainant's business and trademark KOHO in mind, primarily for the purpose of disrupting the Complainant's business, in particular to engage in phishing activities and other types of fraud, which are sufficient facts and evidence to establish bad faith registration.

Section 3.4 of the WIPO Overview 3.1 states that:

"Panels have held that the use of a domain name for purposes other than to host a website may constitute bad faith. Such active ("behind the scenes") uses are considered distinct from the passive holding doctrine discussed above and **can include a range of bad faith activity or scams such as sending email, phishing, identity theft, or malware distribution.** (In some such cases, the respondent may even host a copycat version of the complainant's website.) Many such cases involve the **respondent's use of the domain name to send deceptive emails, e.g., to obtain sensitive or confidential personal information from prospective job applicants, or to solicit payment of fraudulent invoices by the complainant's actual or prospective customers.**" (*Emphasis added*).

Therefore, the Panel finds that the Registrant registered the disputed domain names based on the Complainant's KOHO trademark to incur in paragraph 3.5(c) and 3.5(d) of the CDRP, conduct that under the consensus view provided by section 3.4 of the WIPO Overview 3.1. clearly constitutes bad faith.

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Therefore, the Complainant has satisfied paragraph 4.1(b) of the CDRP requirement.

4.3.3 No Legitimate Interest (some evidence)

Having reviewed the records, the Panel finds that none of the circumstances described in paragraph 3.4 of the CDRP have been shown, in particular given the lack of Response by the Registrant, which, to this Panel, is expected given the illegal nature of its conduct.

As described in this Decision, and as it has been shown by the Complainant, the Registrant has registered the disputed domain names to engage in illegal activity, such as phishing, unauthorized account access, hacking, passing off, or other types of fraud, which according with multiple UDRP WIPO Panelist “can never confer rights or legitimate interests on a respondent” (*underline added*) (see by analogy section 2.13.1 of the WIPO Overview 3.1).

Therefore, the Complainant has satisfied paragraph 4.1(c) of the CDRP requirement.

5. DECISION and ORDER

For the above reasons, in accordance with paragraph 4 of the CDRP, paragraph 12 of the Resolution Rules, the Panel orders that the disputed domain names <support-koho.ca>, <help-koho.ca>, and <disputes-koho.ca> be transferred to Complainant.

Made as of **April 13, 2026**.

SIGNATURE OF PANEL

/María Alejandra López García/

María Alejandra López García

