

ADMINISTRATIVE PANEL DECISION

Skopos Financial, LLC v. Shi Lei

Case No. D2025-2677

1. The Parties

The Complainant is Skopos Financial, LLC, United States of America (“United States”), represented by SafeNames Ltd., United Kingdom.

The Respondent is Shi Lei, China.

2. The Domain Name and Registrar

The disputed domain name <reprisefinancialcareers.com> (the “Domain Name”) is registered with Dynadot Inc (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 8, 2025. On July 8, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On July 9, 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 (REDACTED FOR PRIVACY, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 9, 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 July 10, 2025.

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 July 14, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 3, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 5, 2025.

The Center appointed Gregor Vos as the sole panelist in this matter on August 8, 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

In 2021, the Complainant established the REPRISE FINANCIAL brand, under which it offers a range of consumer lending products, along with financial tips and credit education. The Complainant currently operates in 30 states of the United States.

The Complainant is the owner of *inter alia* the following trademark registration (hereinafter referred to as: the "Trademark"):

- United States trademark registration No. 6791485 for REPRISE FINANCIAL registered on July 12, 2022.

In addition, the Complainant registered the domain name <reprisefinancial.com> on January 11, 2022. This domain name enjoys significant online traffic, attracting approximately 236.500 total visits in January 2025.

The Domain Name was registered on May 16, 2025. Currently, the Domain Name resolves a website displaying pay-per-click ("PPC") advertising links, which redirect Internet users to third party websites.

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 Trademark 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 confusingly similar to the Trademark. The Domain Name incorporates the Trademark in its entirety, with the mere addition of the term "careers". The addition does not prevent a likelihood of confusion. On the contrary, the Complainant contends that the inclusion of "careers" increases the likelihood of confusion, as the Complainant uses this term in the careers section of its official website. The generic Top-Level Domain ("gTLD") ".com" is a standard registration requirement and as such is disregarded under the first element.

Secondly, the Complainant asserts that the Respondent has no rights or legitimate interests in the Domain Name. The Respondent holds no trademark rights to REPRISE FINANCIAL and has never received a license or any other form of authorization from the Complainant to use the Trademark or to suggest any affiliation with the Complainant. The Domain Name has not been used, nor prepared to be used in connection with a bona fide offering of goods and services. Instead, the Trademark is capitalized on its reputation and goodwill, generating revenue by hosting PPC advertising links for Internet users. Furthermore, the term REPRISE FINANCIAL has no common or descriptive meaning.

Finally, according to the Complainant, the Respondent registered and is using the Domain Name in bad faith with the primary intention of taking advantage of the Complainant's Trademark. Even the most basic due diligence would have made revealed the Complainant's rights. The Complainant refers to several circumstances recognized by previous UDRP panels as indicators of bad faith. First, cease-and-desist letters sent to the Respondent were ignored, which demonstrates bad faith behavior. Second, the PPC use described above is further supports a finding of bad faith. Third, The Respondent has activated mail

exchange (MX) records for the Domain Name, also indicative of bad faith. Finally, the Respondent has engaged in a pattern of abusive conduct by registering and using third-party trademarks, as confirmed in other UDRP proceedings.

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;
- ii. the Respondent has no rights or legitimate interests in respect of the Domain Name; and
- iii. the Domain name has been registered and 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 Trademark is reproduced within the Domain Name. Accordingly, the Domain Name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms (here, "careers") may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the Domain Name and the Trademarks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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.

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

C. Registered and 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 Trademark predate the registration of the Domain Name. Given the fact that the Respondent added "careers" to the Domain Name, which is not particularly distinctive, and that the Domain Name further incorporates the Trademark identically, the Panel agrees with the Complainant that it is not conceivable that the Respondent chose the Domain Name without knowledge of the Complainant's activities and its Trademark. [WIPO Overview 3.0](#), Section 3.1.

Further, the Panel has found that the Respondent lacks any rights to or legitimate interests in the Domain name, and in the absence of any conceivable good faith use of the Domain Name, the Panel finds that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website, by creating a likelihood of confusion with the Complainant's Trademark as to the source, sponsorship, affiliation, or endorsement of the Respondent's 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 <reprisefinancialcareers.com> be transferred to the Complainant.

/Gregor Vos/
Gregor Vos
Sole Panelist
Date: August 22, 2025