

ADMINISTRATIVE PANEL DECISION

CCP3 LLC v. Ryan Murphy

Case No. D2026-1724

1. The Parties

The Complainant is CCP3 LLC, United States of America, represented by Grant Attorneys at Law, PLLC, United States of America.

The Respondent is Ryan Murphy, United States of America, represented by Christian & Barton, LLP, United States of America.

2. The Domain Name and Registrar

The disputed domain name <creditgpt.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 22, 2026. On April 23, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 24, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name that differed from the Respondent (Redacted for Privacy) and contact information provided in the Complaint. The Center sent an email communication to the Complainant on April 24, 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 April 28, 2026.

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 May 5, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 29, 2026. The Response was filed with the Center on May 29, 2026.

The Center appointed David H. Bernstein as the sole panelist in this matter on June 12, 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 Complainant is CCP3 LLC, a company organized in Delaware and based in Oakland, California. The Complainant owns a pending United States Patent and Trademark Office (USPTO) application to register the mark CREDITGPT on the Supplemental Register for financial management, financial analysis, credit risk scoring, and providing credit risk scores and underwriting analysis for credit risk management; and software as a service (SAAS) services featuring software using artificial intelligence for credit risk scoring, analyzing and selecting credit products, and providing temporary use of on-line non-downloadable cloud computing software using artificial intelligence. U.S. Application Serial No. 98/956,739 (filed January 13, 2025, claiming a date of first use as December 24, 2025). The Complainant previously sought registration for CREDITGPT for substantially similar credit-related financial and software services, as well as downloadable software using artificial intelligence for the underwriting and risk analysis of lending products, U.S. Application Serial No. 98/032,238 (filed June 7, 2023 on an intent-to-use basis), but it abandoned that application when it failed to respond to a final office action that the USPTO issued on October 13, 2024, refusing registration on the grounds that the mark, CREDITGPT, is merely descriptive of a feature, function, and characteristic of the applicant's services.

The Complainant asserts that it used CreditGPT on a website at least as early as October 2024.

The Respondent registered the disputed domain name on October 7, 2025. The website to which the disputed domain name resolves purports to be "the gold standard for credit document analysis," and invites users to demo its services, which allow users to "automatically analyze complex credit documents and get all the information you need laid out for you, instantly. Covenants, baskets, structural risks and more – extracted and organized in minutes."

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 disputed domain name.

The Complainant contends that it has acquired trademark and service mark rights to CREDITGPT for financial management, financial analysis, credit risk scoring, and software-as-a-service (SAAS) offerings using artificial intelligence for credit-related services through use in the United States, and that it owns a pending trademark application for the mark CREDITGPT in the United States, and that it has had pending trademark applications since June 7, 2023. The Complainant contends that it has used the CREDITGPT mark on its website since at least as early as October 2024. The Complainant contends that the disputed domain name is identical to its CREDITGPT trademark.

The Complainant contends that the Respondent and his company, Pillar Technology Inc., are not affiliated with CCP3 in any way and have not been authorized by the Complainant to use, register, or seek the registration of any domain name incorporating the CREDITGPT mark.

The Complainant contends that the Respondent intentionally attempted to attract, for commercial gain, Internet users to his website by creating a likelihood of confusion with the Complainant's mark. The Complainant cites *Research in Motion Limited v. Dustin Picov*, WIPO Case No. [D2001-0492](#), for the proposition that, when a domain name "is so obviously connected with a Complainant and its services[,] that its very use by someone with no connection to the Complainant suggests 'opportunistic bad faith'". The Complainant further contends that the Respondent used the disputed domain name primarily for the purpose of disrupting the business of a competitor.

B. Respondent

The Respondent contends that the Complainant has not satisfied any of the three elements required under the Policy for a transfer of the disputed domain name.

The Respondent states that he was formerly an investment banker in the Restructuring Group at Houlihan Lokey and then an associate on the investment team at Centerbridge Partners, a New York hedge fund. At both firms, the Respondent developed deep expertise in the analysis of complex credit documents. After his time in the financial industry, the Respondent decided to build a tool that leverages artificial intelligence to analyze complex credit documents. He selected the name CreditGPT because it describes the function of his platform: AI analysis of credit agreements and other related credit documents.

The Respondent states that he incorporated Pillar Technology Inc. in Delaware on May 13, 2025, and began software development on May 20, 2025. The Respondent registered the domain name <creditgpt.io> on June 13, 2025, and first publicly published the CreditGPT prototype at the website "www.creditgpt.io" on June 14, 2025. Between July and October 2025, the Respondent wrote roughly 50,000 lines of software code to build a client-ready version of CreditGPT. On October 7, 2025, the Respondent purchased

<creditgpt.com> from a third party for USD 4,999; he thereafter published the CreditGPT platform at the "www.creditgpt.com" website on October 10, 2025. The Respondent signed his first paying client on November 12, 2025, and his second paying client on November 17, 2025.

The Respondent states that all of this activity occurred before the date that the Complainant claims, in its trademark application, first use of its CREDITGPT trademark, which is December 24, 2025.

The Respondent contends that he did not register or use the disputed domain name to exploit the Complainant, did not register the disputed domain name to sell it to the Complainant, and is not using the disputed domain name to disrupt the Complainant's business or divert the Complainant's customers.

The Respondent contends that the Complainant relies primarily on a pending USPTO application that does not establish trademark rights. The Respondent contends that CreditGPT is, at minimum, highly descriptive in the relevant context, with "credit" describing the subject matter and "GPT" describing the AI used.

The Respondent contends that the Complainant offers no evidence of actual confusion, copying, or awareness of the Complainant. The Respondent contends that CreditGPT is not uniquely associated with the Complainant, CCP3, but a descriptive combination of "credit" and "GPT" adopted for a product that uses AI/GPT technology to analyze credit documents.

The Respondent requests a finding of Reverse Domain Name Hijacking ("RDNH") on the grounds that the Complainant, knew or should have known that it could not prove all the required UDRP elements.

6. Discussion and Findings

In order to have the disputed domain name transferred, the Complainant must show by a preponderance of the evidence:

- i. that the disputed domain name is identical or confusingly similar to a trademark or service mark in which it holds rights;
- ii. that the Respondent has no rights or legitimate interests in the disputed domain name; and
- iii. that the disputed domain name was registered and used in bad faith.

The Complainant fails to establish any of these three elements.

A. Identical or Confusingly Similar

This case fails at the outset. The Complainant has not come close to establishing trademark rights in the term CREDITGPT.

The Complainant's reliance on its pending trademark application is misplaced. As multiple UDRP decisions over decades have made clear, a pending trademark application standing alone does not establish trademark rights. See [WIPO Overview 3.1](#) of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.1.4.

Moreover, the application on which the Complainant relies is not even an application for the Principal Register. Rather, the USPTO required the Complainant to amend the application to be on the Supplemental Register because, the USPTO determined in an Office Action dated June 30, 2025, the term CREDITGPT is merely descriptive for the credit-related services for which the Complainant sought registration. Rather than submit argument that the term was not merely descriptive, or that the term had acquired distinctiveness, the Complainant acquiesced to the USPTO's request and amended its application to seek registration solely on the Supplemental Register. Thus, even if the USPTO eventually registers the mark, that registration will still not provide evidence of trademark rights for purposes of the UDRP because marks on the Supplemental Register have no prima facie evidence of validity; to the contrary, they reflect marks that are merely descriptive and for which secondary meaning has not been shown. [WIPO Overview 3.1](#), section 1.2.2.

In the absence of any valid trademark registration, the Complainant can only establish that it has trademark rights for purposes of the UDRP if it can show that its mark has acquired distinctiveness. The Complainant has not submitted any such evidence. It asserts that it has used CreditGPT on a website "at least as early as October 2024", but the Complainant does not provide a screenshot of that website as evidence, and that statement appears inconsistent with its statement to the USPTO that its date of first use was December 24, 2025.

Whatever its date of first use, the Complainant has not submitted any factual evidence of sales, website traffic, public recognition, or press coverage, or any other evidence that would support a showing of acquired distinctiveness.

The Panel therefore finds that the Complainant has failed to establish the first element of the Policy.

B. Rights or Legitimate Interests

The Complainant also fails to establish that the Respondent lacks rights or legitimate interests. To the contrary, the website on its face appears to provide legitimate services that are descriptively related to the CREDITGPT name. And the Respondent has made a compelling showing that it has used the disputed domain name in connection with a bona fide offering of services since long prior to the filing of this proceeding.

Among the evidence submitted by the Respondent that establishes his rights and legitimate interests in the disputed domain name are the following:

- The Respondent incorporated Pillar Technology Inc. on May 13, 2025, and began active software development of the CreditGPT platform on May 20, 2025.
- The Respondent registered <creditgpt.io> on June 13, 2025, and first published the CreditGPT prototype at the website to which that domain name resolved on June 14, 2025.
- The Respondent wrote approximately 50,000 lines of software code to build a client-ready version of the platform between July and October 2025.
- The Respondent published the CreditGPT platform at “www.creditgpt.com” on October 10, 2025, and signed paying clients on November 12 and November 17, 2025.

This evidence is precisely the type of evidence that establishes rights and legitimate interests under the Policy. See [WIPO Overview 3.1](#), section 2.2.

Notably, all of this activity occurred before the Complainant’s date of first use that the Complainant provided to the USPTO (December 24, 2025). It also was long before any notice of this dispute, since the Respondent’s first notice to the Complainant of this dispute was a cease-and-desist letter sent more than six months after the Respondent launched his “www.creditgpt.com” website, on April 22, 2026.

For all of these reasons, the Complainant has failed to establish the second element of the Policy.

C. Registered and Used in Bad Faith

Not surprisingly, the Complainant also fails to establish any part of the bad faith element.

For starters, the Panel finds that the Respondent did not register the disputed domain name in bad faith. The Respondent could not have registered the disputed domain name to target the Complainant or its trademark rights because the Complainant had no trademark rights for purposes of the Policy at the time that the Respondent registered the disputed domain name. [WIPO Overview 3.1](#), section 3.8.1.

Furthermore, although the Complainant parrots the conclusory allegation that the Respondent intentionally attempted to attract Internet users for commercial gain by creating confusion with the Complainant, the Complainant has not submitted any factual evidence to support that allegation. The Complainant offers no evidence that the Respondent knew (or should have known) of the Complainant or its alleged trademark at the time of registration, no evidence that the Complainant’s alleged mark was widely known (or indeed known at all), no evidence of copying, and no evidence of actual confusion.

To the contrary, the Panel finds that the Respondent registered the disputed domain name in good faith because it is a perfectly descriptive domain name for the AI-fueled credit agreement review services that the Respondent offers. The Respondent did not register the disputed domain name to sell, rent, or transfer it to the Complainant, did not contact the Complainant seeking payment, and did not solicit the Complainant to buy the disputed domain name.

The Complainant’s reliance on *Research in Motion v. Dustin Picov*, WIPO Case No. [D2001-0492](#), is misplaced. In *Research In Motion*, the panel found “opportunistic bad faith” because the domain name at issue incorporated the well-known and distinctive name of a major technology company. Here, the circumstances are entirely different. CREDITGPT is not a distinctive mark uniquely associated with the Complainant; it is a descriptive combination of the generic term “credit” and the widely used technology abbreviation “GPT.” Indeed, the USPTO itself found CREDITGPT to be merely descriptive, and the Complainant did not dispute that finding. Nor has the Complainant submitted any evidence of sales, public recognition, or other indications that would make “CREDITGPT” so connected with the Complainant as to support “opportunistic bad faith.” A domain name composed of common, descriptive terms does not give rise to “opportunistic bad faith” on which *Research In Motion* relied.

The Panel finds the Complainant has not satisfied the third element of the Policy.

D. Reverse Domain Name Hijacking

This case is a poster child for RDNH.

Paragraph 15(e) of the Rules provides that if, after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at RDNH or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the Complaint is not, on its own, sufficient to constitute RDNH. [WIPO Overview 3.1](#), section 4.16.

First, the Complainant obviously lacks trademark rights. It has no registration, the USPTO has determined that its mark is merely descriptive, and the Complainant itself agreed to amend its pending application to the Supplemental Register. The Complainant did not make any effort to establish secondary meaning with factual allegations.

Second, the Complainant either overlooked an obvious limitation or attempted to mislead the Panel. It claimed to have a pending trademark application but did not disclose in the Complaint that the application was for the Supplemental Register. Further, the Complainant deceptively asserted that it has had an active application pending in the USPTO as of June 7, 2023, but it failed to disclose that the application it filed on June 7, 2023, was refused registration and that the Complainant abandoned that application. As documented above, there are also serious questions as to the veracity of the Complainant's assertion that it first used the term CREDITGPT on its website as of October 2024. The Complainant has submitted no documentary evidence to substantiate that assertion, and it seems to be belied by the Complainant's own statements to the USPTO.

Third, the Complainant ignored the obvious legitimate business that the Respondent has at the website to which the disputed domain name resolves, and made no attempt to explain its view that the website does not reflect rights and legitimate interests in the disputed domain name.

Fourth, the Complainant's contention that the Respondent registered and used the disputed domain name in bad faith rests on bare allegations that simply parrot the elements of the Policy without offering any factual or evidentiary foundation. It alleges competitor disruption and confusion, but identifies no actual confusion or evidence of targeting.

The fact that the Complainant was represented by counsel, who should have known better, only exacerbates the clear RDNH in this case.

The Panel finds that the Complainant brought the Complaint in bad faith and constitutes an attempt at Reverse Domain Name Hijacking.

7. Decision

For the foregoing reasons, the Panel denies the Complaint.

/David H. Bernstein/

David H. Bernstein

Sole Panelist

Date: June 26, 2026