

ADMINISTRATIVE PANEL DECISION

Paybook Inc v. Chr S., Lakerock
Case No. DAI2026-0015

1. The Parties

The Complainant is Paybook Inc, United States of America (“United States”), internally represented.

The Respondent is Chr S., Lakerock, Belgium.

2. The Domain Name and Registrar

The disputed domain name <paybook.ai> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 3, 2026. On March 4, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 4, 2026, 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 (Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 5, 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 amendment to the Complaint on March 5, 2026.

The Center verified that the Complaint together with the amendment to the 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 March 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 31, 2026. The Response was filed with the Center on March 11, 2026. On March 18, 2026, the Complainant submitted an unsolicited supplemental filing. On March 18, 2026, the Respondent submitted a reply in response to the Complainant’s unsolicited supplemental filing.

The Center appointed Warwick A. Rothnie as the sole panelist in this matter on March 20, 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 a company based in the United States. It operates from a website at “www.paybook.com” from which it provides “a financial hub that promotes automation, efficiency, collaboration and transparency.” At least in part, the services are said to enable the user to “[a]utomatically track and manage all of [their] personal, social and business transactions in one place.”

According to the Complaint, the Complainant has been providing its services under the trademark PAYBOOK since 2011.

The Complaint includes evidence that the Complainant owns two registered trademarks:

(a) United States Registered Trademark No 4,163,531, PAYBOOK, which was registered in the Principal Register on June 26, 2012, in respect of computer software development, computer programming and maintenance of computer software for personal and business financial management services in International Class 42. The registration record shows that the Complainant claimed first use in commerce on May 15, 2011.

(b) United States Registered Trademark No 4,724,617, PAYBOOK, which was registered in the Principal Register on April 21, 2015, in respect of software for personal and business transaction management in International Class 9 and software as a services (SAAS) services featuring software for personal and business transaction management in International Classes 9 and 42. This trademark claims a first use in commerce in September 2013.

According to the WhoIs record, the disputed domain name was registered on December 13, 2023.

It has not resolved to an active website.

The Complaint includes as Annex 2 a screenshot of part of the landing page to which (according to the Complainant) the disputed domain name resolved at that time. The landing page was, or appeared to be, a Registrar provided parking page and stated “This domain is registered, but may still be available. If you’re interested, try our Domain Broker service.”

At the time this decision is being prepared, the disputed domain name resolves to a website which appears to feature a number of stock images under the heading “paybook.ai”. There are inactive links: “Start”, “Shop”, for a search box, and a for a shopping cart. In addition, there is a phrase “Bald geht’s loss” which loosely translates into “coming soon”. There are also boxes to provide an email address for registration or to contact the website operator. The footer of the page includes a notice “Copyright © 2026 paybook.ai - Alle Rechte vorbehalten.”

5. Discussion and Findings

Paragraph 4(a) of the Policy provides that in order to divest the Respondent of a disputed domain name, the Complainant must demonstrate each of the following:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;

- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

Paragraph 15(a) of the Rules directs the Panel to decide the Complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.

As noted above, the Complainant has submitted an unsolicited supplemental filing. Apart from documents requested by the Panel pursuant to paragraph 12 of the Rules, neither the Policy nor the Rules expressly provide for supplemental filings. Their admissibility therefore is within the discretion of the Panel bearing in mind the requirements under paragraph 10 of the Rules to ensure that the proceeding is conducted with due expedition and both parties are treated equally, with each party being given a fair opportunity to present its case.

In this case the Complainant says that the form of website included in its unsolicited supplemental filing was unavailable before the filing of the response. The Respondent disputes this. If the Complainant is right, it would be appropriate to admit the supplemental filing. In these circumstances, the Panel considers it appropriate to admit the unsolicited supplemental filing and deal with the purported evidence as a matter of substance rather than in a procedural step.

A. Identical or Confusingly Similar

The first element that the Complainant must establish is that the disputed domain name is identical with, or confusingly similar to, the Complainant's trademark rights.

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

In the present case, the disputed domain name is identical to the Complainant's proven registered trademarks (disregarding the ".ai" Top-Level Domain).¹

Accordingly, the Panel finds that the Complainant has established the first requirement under the Policy.

B. Rights or Legitimate Interests

The second requirement the Complainant must prove is that the Respondent has no rights or legitimate interests in the disputed domain name.

Paragraph 4(c) of the Policy provides that the following circumstances can be situations in which the Respondent has rights or legitimate interests in a disputed domain name:

- (i) before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
- (ii) [the Respondent] (as an individual, business, or other organization) has been commonly known by the [disputed] domain name, even if [the Respondent] has acquired no trademark or service mark rights; or

¹ As is permissible in the circumstances of this case: [WIPO Overview 3.1](#), section 1.11.

(iii) [the Respondent] is making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

These are illustrative only and are not an exhaustive listing of the situations in which a respondent can show rights or legitimate interests in a domain name.

While 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 often impossible 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. 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.

There is no dispute between the Parties that:

- (1) The Respondent registered the disputed domain name after the Complainant began using the trademark and also after the Complainant had registered its trademarks;
- (2) The Respondent is not affiliated with the Complainant;
- (3) The Complainant has not otherwise authorised the Respondent to use the disputed domain name;
- (4) The disputed domain name is not derived from the Respondent’s name. Nor is there any suggestion of some other name by which the Respondent is commonly known from which the disputed domain name could be derived.

These factors are usually sufficient to establish a prima case that the Respondent does not have rights or legitimate interests in a disputed domain name.

The Respondent points out that the words “pay” and “book” are two ordinary English words. The Respondent says he conceived the name for a potential financial software concept that integrates payment execution and account entry creation in a single workflow. According to the Respondent, in many accounting processes today, invoices are first paid through a banking interface and then booked separately in different accounting software. That separation creates delays and reconciliation issues between payment systems and bookkeeping records. Therefore, the Respondent envisages a system where the steps occur simultaneously. In this concept, the system “pays” the invoice and “books” the accounting entry simultaneously, hence what the Respondent calls the descriptive name “Paybook”. According to the Respondent, registering a domain name composed of ordinary descriptive words for a potential project or start-up concept is a legitimate activity.

This appears to be an attempt to invoke the defence outlined by paragraph 4(c)(i) of the Policy or to claim a right or legitimate interest by analogy to that defence. Paragraph 4(c)(i) of the Policy does not require use of the disputed domain name in connection with a good faith offering of goods or services. Demonstrable preparations for such use may suffice. If preparations towards use rather than use itself are to be relied on, however, there must be some evidence which demonstrates the claimed preparations. As [WIPO Overview 3.1](#), section 2.2 reports the longstanding consensus view under the Policy:

“If not independently verifiable by the panel, claimed examples of use or demonstrable preparations to use the domain name in connection with a bona fide offering of goods or services cannot be merely self-serving but should be inherently credible and supported by other relevant pre-complaint evidence.”

In the present case, there is no such evidence just the Respondent's uncorroborated claims. Further, as the Complainant contends, the absence of any such evidence is reinforced by the passage of more than two years since the Respondent registered the disputed domain name. The absence of use or demonstrable preparations for such use cannot be explained by the speed with which the Complaint was filed.

In these circumstances, the Respondent has not demonstrated preparations to commence use in good faith. Accordingly, the Respondent has not rebutted the prima facie case established by the Complainant and the Panel finds the Complainant has established the second requirement under the Policy also.

C. Registered and Used in Bad Faith

Under the third requirement of the Policy, the Complainant must establish that the disputed domain names have been both registered and used in bad faith by the Respondent. These are conjunctive requirements; both must be satisfied for a successful Complaint: see e.g. *Group One Holdings Pte Ltd v. Steven Hafto* WIPO Case No. [D2017-0183](#).

Generally speaking, a finding that a domain name has been registered and is being used in bad faith requires an inference to be drawn that the Respondent in question has registered and is using the disputed domain name to take advantage of its significance as a trademark owned by (usually) the Complainant.

The Complainant contends that it is inconceivable the Respondent was unaware of the Complainant's rights when registering the disputed domain name in view of the Complainant's extensive use and registration of the PAYBOOK trademark. Apart from the fact that the Complainant appears to have been using its trademark for more than 10 years, however, the Complainant has not provided evidence demonstrating the claimed extensive use and reputation which would support this claim.

However, the Complainant also invokes the "try our Domain Broker service" form of the website to support a contention that the disputed domain name has been registered and used to attract a buyer based on the resemblance of the disputed domain name to the Complainant's trademark.

In considering this contention, the Panel notes first that the Respondent has not expressly denied knowledge of the Complainant and its trademark. Instead, the Respondent denies an attempt to free ride on the Complainant's trademark and contends that the two words comprised in the disputed domain name are ordinary English words descriptive of the business concept which the Respondent claims he or she is developing. As discussed in Section 5B above, however, the Panel has found that the claimed business is not supported by any evidence and has not accepted that claim.

The Complainant's own website explains that the term "pay book" is derived from the records or books kept by the United States Government in World War I and World War II to record the pay and expenses incurred by soldiers on the front lines. So, there can be a descriptive connotation of the term in some contexts. However, the term is not directly descriptive of either the Complainant's service or the suggested business concept of the Respondent, as is confirmed by the registration of the Complainant's trademarks in the Principal Register of the United States Trademarks Register.

The Panel also notes that the Respondent's proposed business concept, if not exactly the same as the Complainant's existing business, is at least in the same or a very similar field.

In these circumstances and having rejected the claimed business derivation of the disputed domain name, the Panel finds that the Respondent has registered the disputed domain name in bad faith.

The Complainant relies on the registrar-provided parking page in which the viewer is invited to "try our Domain Broker service" to see if the disputed domain name can be acquired as evidence of use in bad faith. The screenshot in Annex 2 appears to have been taken on Thursday 26 February [2026]. In its supplemental filing, the Complainant says that the form of landing page for the disputed domain name changed to the "Coming Soon" generic placeholder five days after the Response was filed.

The Respondent advances two contentions to rebut this claim. Taking these in reverse order, the Respondent's second argument in rebuttal of the Complainant's supplemental filing is that the materials in the supplemental filing are legally irrelevant because the Policy requires the relevant elements to be assessed at the time of registration and not based on subsequent events. This argument, however, is incorrect as the third element of the Policy requires both registration in bad faith and subsequent use in bad faith.

Turning to the Respondent's first argument, the Respondent denies that the disputed domain name has resolved to the screenshot provided by the Complainant in Annex 2 to the Complaint and contends that it has always resolved to the "Coming Soon" form of parking page advanced in the Complainant's supplemental filing.

In support of this denial the Respondent has provided a screenshot of the activity logs for the disputed domain name, which show "Your domain recorded zero high-risk activities in the last 180 days. That means your settings are stable and secure." The screenshot shows that there have been zero changes to:

- Ownership And Control;
- Protection And Privacy;
- DNS configuration;
- Monetization And Listings.

So far as the Panel can ascertain from the Registrar's 'What is Domain Protection?' page,² simply changing the landing page is not something that would be recorded in the high-risk action statistics itself. On their face therefore the logs do not appear to support the Respondent's claim.

In addition, while the links on the "Coming Soon" form of the Respondent's website are inactive, the landing page does include what appear to be active boxes for capturing viewers' email addresses. Further as mentioned in section 4 above, the copyright notice included in the footer of the website states it was published in 2026.

On the record in this proceeding, the Respondent's explanation for how he came to derive the disputed domain name and its intended use has not been accepted. Further, the Respondent has not demonstrated that the "Try our domain broker service" form of website has been fabricated. Taking all these matters into account, the Panel finds that the Respondent has used the disputed domain name in bad faith.

Accordingly, the Complainant has established all three requirements under the Policy.

6. 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 <paybook.ai> be transferred to the Complainant.

/Warwick A. Rothnie/
Warwick A. Rothnie
Sole Panelist
Date: March 30, 2026

² <https://www.godaddy.com/en-au/help/what-is-domain-protection-32311>.