

ADMINISTRATIVE PANEL DECISION

Clover Network, LLC v. Domain Administrator, Fast Serv Inc. d.b.a.

QHoster.com

Case No. D2025-1441

1. The Parties

The Complainant is Clover Network, LLC, United States of America (“U.S”), represented by Michael Best & Friedrich, LLP, U.S.

The Respondent is Domain Administrator, Fast Serv Inc. d.b.a. QHoster.com, Belize.

2. The Domain Name and Registrar

The disputed domain name <cloversgroups.com> (the “Domain Name”) is registered with NameSilo, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 8, 2025. The Complainant filed an amended Complaint on May 6, 2025. On May 20, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On May 20, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Complainant filed a second amended Complaint on May 21, 2025.

The Center verified that 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 May 22, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 11, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on June 24, 2025.

The Center appointed Mathias Lilleengen as the sole panelist in this matter on June 30, 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 to ensure compliance with the Rules, paragraph 7.

4. Factual Background

The Complainant began its operations in 2012. It offers open-architecture point of sale solutions aimed at small and medium sized business owners. As of the quarter ended September 2020, the Complainant processed USD 133 billion of annualized card transactions worldwide, under the CLOVER trademark. The Complainant is part of Fiserv, Inc., a global provider of financial services technology to the financial world, including banks, credit unions, securities processing organizations, insurance companies and retailers. The Complainant advertises its products and services through its website “www.clover.com”, through social media, via commercials on U.S television, through brochures and through a network of independent sales agents. The Complainant’s products and services are sold by the Complainant and authorized resellers, such as banks and credit unions.

The Complainant owns numerous trademark registrations that include the text CLOVER, such as U.S. trademark registration number 4227414, registered on October 16, 2012.

The Domain Name was registered on October 28, 2024. The Complainant documents that the Domain Name has resolved to a webpage that offers financial services. The webpage mimics the Complainant as it lists the Complainant’s address and includes false statements about the Respondent’s alleged business. At the time of drafting the Decision, the Domain Name resolves to an access-restricted webpage under the title “Clovers Bank”.

5. Parties’ Contentions

A. Complainant

The Complainant provides evidence of trademark registrations and argues that its trademark is well known. The Complainant states that the Domain Name is confusingly similar to the Complainant’s trademark as the Domain Name incorporates the Complainant’s entire trademark in combination with the term “groups”.

The Complainant argues that the Respondent has no rights or legitimate interests in respect of the Domain Name. The Complainant has not authorized the Respondent to use and register its trademark. The Respondent’s use of the Domain Name is, according to the Complainant, an attempt to intentionally deceive consumers into believing the Respondent is associated with the Complainant. It is not bona fide use.

The Complainant believes the Respondent registered the Domain Name and used it in bad faith to impersonate the Complainant. The Respondent claims to be located at the Complainant’s physical address, falsely associating itself with the Complainant. The Respondent is seeking to cause a likelihood of confusion among consumers, in which consumers are confused, mistaken, or deceived into believing the Respondent’s financial products and services are affiliated with or endorsed by the Complainant. The Respondent knew or should have known of the existence of the Complainant when the Respondent registered the Domain Name.

B. Respondent

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

6. Discussion and Findings

A. Identical or Confusingly Similar

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 Domain Name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has established that it has rights in the trademark CLOVER. In this case, the Domain Name incorporates the Complainant's trademark with the addition of "sgroups". The addition does not prevent a finding of confusing similarity between the Domain Name and the trademark. For the purpose of assessing under paragraph 4(a)(i) of the Policy, the Panel may ignore the generic Top-Level Domain; see [WIPO Overview 3.0](#), section 1.11.1.

The Panel finds that the Domain Name is confusingly similar to a trademark in which the Complainant has rights in accordance with paragraph 4(a)(i) of the Policy.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which a respondent may demonstrate rights or legitimate interests in a disputed 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 3.0](#), section 2.1.

The Respondent is not affiliated or related to the Complainant in any way. There is no evidence that the Respondent has registered the Domain Name as a trademark or acquired trademark rights. There is no evidence of the Respondent's use of, or demonstrable preparations to use, the Domain Name or a name corresponding to the Domain Name in connection with a bona fide offering of goods or services. On the contrary, the Respondent's use is evidence of bad faith, see below.

The Panel finds that the Respondent has no rights or legitimate interests in respect of the Domain Name in accordance with paragraph 4(a)(ii) of the Policy.

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.

The Respondent most likely knew of the Complainant when the Respondent registered the Domain Name. It follows from the composition and use of the Domain Name. The use of the Domain Name is evidence of bad faith. The Respondent falsely purports to be associated with the Complainant. The Panel finds that the Respondent has registered the Domain Name, which is confusingly similar to the Complainant's trademark, to drive Internet traffic to the Respondent's webpage by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website. See paragraph 4(b)(iv) of the Policy.

Based on the available record, 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 the Domain Name <cloversgroups.com> transferred to the Complainant.

/Mathias Lilleengen/

Mathias Lilleengen

Sole Panelist

Date: July 4, 2025