

## ADMINISTRATIVE PANEL DECISION

Stripe, Inc. v. Stripe Chain, Toni Rismawan  
Case No. D2025-1809

### 1. The Parties

The Complainant is Stripe, Inc., United States of America (“United States”), represented by Elster & McGrady LLC, United States.

The Respondents are Stripe Chain, United States, and Toni Rismawan, Indonesia.

The Respondents, Stripe Chain and Toni Rismawan are collectively herein, referred to as “the Respondent”.

### 2. The Domain Names and Registrar

The disputed domain names <stripechain.org> and <stripechain.xyz> are registered with NameCheap, Inc. (the “Registrar”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 6, 2025. On May 7, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On May 7, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint.

The Center sent an email communication to the Complainant on May 9, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all disputed domain names are under common control. The Complainant filed an amended Complaint on May 13, 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 May 20, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 9, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 14, 2025.

The Center appointed Shwetasree Majumder as the sole panelist in this matter on June 21, 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**

The Complainant is a technology company that builds infrastructure for the Internet. The Complainant carries on businesses in over 40 countries, including the United States. The Complainant's primary business website is "www.stripe.com". The Complainant is also the registered proprietor of the STRIPE trademark in several jurisdictions, and details of a few such registrations are furnished below:

- STRIPE – United States Registration No. 4451679, registered on December 17, 2013, in class 36.
- STRIPE – International Registration No. 1255080, registered on January 14, 2015, in class 36.
- STRIPE – Indonesian Registration No. IDM000626230, registered on April 7, 2015, in class 36.

Additionally, the Complainant also owns domain names featuring its STRIPE mark such as <stripe.com> registered on September 12, 1995.

The disputed domain name <stripechain.org> was registered on January 14, 2025, and the other disputed domain name <stripechain.xyz> was registered on January 3, 2025. The disputed domain names previously resolved to websites offering payment services. In January 2025, the Complainant sent takedown requests to the hosts of the disputed domain names, after which the disputed domain names did not resolve to active 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 disputed domain names.

Notably, the Complainant contends that the disputed domain names are confusingly similar to its STRIPE trademark. The Complainant contends that the disputed domain names include its trademark as a whole along with an industry specific term "chain". The Complainant contends that such an alteration, however, does not sufficiently differentiate the disputed domain names from the Complainant's mark for a confusingly similar analysis. The Complainant also contends that the addition of the term "chain" aids in creating confusion because "chain" refers to the blockchain, a system where cryptocurrency is maintained. The Complainant also asserts that the use of the ".xyz" or ".org" as generic Top-Level Domains ("gTLDs") has no capacity to distinguish the disputed domain names from the Complainant's trademark.

The Complainant asserts that the Respondent lacks any rights or legitimate interests in the disputed domain names. The Complainant contends that the Respondent has caused Internet users to divulge personal information or other compromising information by falsely and deceitfully offering confusingly similar payment services to Internet users, as shown on the prior websites at the disputed domain names. The Complainant asserts that the Respondent's real intention appeared to be to commit phishing and fraud via websites which likely harvest personal information of confused consumers and thereafter sell worthless cryptocurrency to such consumers. The Complainant asserts that the Respondent has never been commonly known by the

STRIPE marks, nor any variation thereof. The Complainant further submits that it has not granted the Respondent any license, permission, or authorization by which it could own or use any domain names which are confusingly similar to any of the STRIPE marks.

The Complaint contends that the Respondent has registered the disputed domain names in bad faith as the Respondent appeared to have used the disputed domain names for phishing and fraud websites in order to sell worthless cryptocurrency, which was representative of clear-cut bad faith registration and use. The Complainant further contends that the Respondent does not own any trademark rights for the mark STRIPE to provide financial services and registered the disputed domain names to attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of its websites. The Complainant contends that there is no conceivable reason for the Respondent to have registered the disputed domain names other than to trade off the reputation and goodwill of the STRIPE marks and to disrupt the Complainant's business. The Complainant further asserts that the makeup of the disputed domain names and the nature of the use evidence bad faith registration and use. The Complainant asserts that the Respondent had actual knowledge of the Complainant and the Complainant's STRIPE marks.

## **B. Respondent**

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

## **6. Discussion and Findings**

### **Consolidation: Multiple Respondents**

The Complainant alleges that the disputed domain name registrants are the same entity or merely alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”), section 4.11.2.

According to the Complainant, the disputed domain names share several common control factors. The Complainant has pointed out that the disputed domain names previously resolved to substantially identical websites which consisted of identical website layouts, format, color scheme, font, and textual content. The Complainant further contends that although the Whois details are different for each of the disputed domain names, the information provided by the registrants is fictitious. The Complainant also contends that disputed domain names are virtually identical as they consist only of the STRIPE mark with the addition of “chain”. The only difference is in the gTLDs. The Complainant has also drawn the Panel's attention to the fact that the disputed domain names were registered within a week and a half of each other. In this regard, the Complainant argues that the disputed domain names are controlled by one entity or person, and as such, should be treated as a single respondent for the purposes of the Policy and Rules. The Panel finds that the registrants of both the disputed domain names are very likely the same individual and should be treated as one. In this regard, the Complainant has put its reliance on *John Swire & Sons Limited v. Domain Admin, Privacy Protect, LLC (PrivacyProtect.org) / zenoforex1759 mark, TECHNOCREATIVITY and zenoforex macaulay, TECHNOCREATIVITY*, WIPO Case No. [D2022-2380](#).

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants in a single proceeding.

#### **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 trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

The Complainant has satisfactorily demonstrated its rights in respect of a trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. The entirety of the mark is reproduced within the disputed domain names. The addition of the word "chain" does not prevent a finding of confusing similarity between the disputed domain names and the mark. Accordingly, the disputed domain names are confusingly similar to the Complainant's mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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 with 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 disputed domain names. 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 disputed domain names such as those enumerated in the Policy or otherwise.

Panels have held that the use of a domain name for illegal activity such as phishing or fraud can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

The Panel finds that the Respondent's real intention behind registering the disputed domain names appears to be phishing and harvesting Internet users' personal information in connection with a cryptocurrency scam.

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.

In the present case, the Panel notes that the disputed domain name <stripechain.org> was registered on January 14, 2025, and the other disputed domain name <stripechain.xyz> was registered on January 3, 2025, long after the Complainant established rights in its STRIPE trademark and registered its domain names. The Panel finds that the Respondent most likely used the disputed domain names for phishing and fraud websites in connection with a cryptocurrency scam, which is representative of clear-cut bad faith registration and use. The Panel finds, based on the case record, that the Respondent does not own any trademark rights for the mark STRIPE to provide financial services and registered the disputed domain names to attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of its websites.

Panels have held that the use of a domain name for illegal activity here, claimed as phishing, or other types of fraud, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitutes bad faith under the Policy.

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 disputed domain names <stripechain.org> and <stripechain.xyz> be transferred to the Complainant.

*/Shwetasree Majumder/*

**Shwetasree Majumder**

Sole Panelist

Date: July 5, 2025