

ARBITRATION AND MEDIATION CENTER

ADMINISTRATIVE PANEL DECISION

Stripe, Inc. v. dongsheng xu Case No. D2025-3548

1. The Parties

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

The Respondent is dongsheng xu, China.

2. The Domain Names and Registrar

The disputed domain names <paystripe.forum>, <paystripe.homes>, <paystripe.lat>, <paystripe.lol>, <paystripe.pics>, <paystripeppro.lol>, <paystripeppro.shop>, <paystripeppro.xyz>, <paystripep.shop>, <paystripep.xyz<, <paystripe.quest>, <stripepaypal.forum>, <stripepaypal.homes>, <stripepaypal.quest>, <stripepaypal.sbs>, <stripeppay.shop>, <stripeppay.xyz>, <stripeppro.lol>, <stripeppro.shop>, <stripeppro.xyz>, and <stripepro.xyz> are registered with Porkbun LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 2, 2025. On September 3, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On September 4, 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 ("Whois Privacy, Private by Design, LLC") and contact information in the Complaint. The Center sent an email communication to the Complainant on September 17, 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 September 19, 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 September 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 13, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 14, 2025.

The Center appointed Zoltán Takács as the sole panelist in this matter on October 20, 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 economic infrastructure for the Internet and is present in over 40 countries. Businesses of every size – from new startups to public companies – use the Complainant's software to accept payments and manage their businesses online.

The Complainant is among others owner of the United States Trademark Registration No. 4451679 for the word mark STRIPE registered since December 17, 2013, and which the Complainant has used in connection with financial services and payment processing since as early as 2011, as indicated on the trademark registration.

The Complainant is also owner of the domain name <stripe.com> which was registered on September 12, 1995, and resolves to its corporate website.

The disputed domain names were registered between March 20 and April 1, 2025, and have been resolving to either inactive webpages reading "This site can't be reached" or to the parked webpage of the Registrar.

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 trademark because they consist of the entirety of the STRIPE trademark along with the terms such as "p", "pay" and "pro" and/or the third-party trademark PAYPAL;
- the Respondent has no rights or legitimate interests in respect of the disputed domain names since it is unable to rely on any of the circumstances set out in paragraphs 4(c)(i), (ii), or (iii) of the Policy;
- due to the recognition of the Complainant's trademark in the financial sector the Respondent likely knew of and targeted the Complainant's trademark through registration of the disputed domain names; and
- the establishment of MX (mail exchange) records for the disputed domain names indicates that the Respondent has made preparations to generate potentially spam or fraudulent phishing emails using the disputed domain names, which is additional indication of bad faith.

The Complainant requests that the disputed domain names be transferred from the Respondent to the Complainant.

The Complainant states that regarding the disputed domain names which incorporate the third-party trademark PAYPAL the owner of it has been notified of enforcement against the disputed domain names and has provided express consent regarding transfer of such disputed domain names.

B. Respondent

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

6. Discussion and Findings

A complainant must evidence each of the three elements required by paragraph 4(a) of the Policy in order to succeed on the complaint, namely that:

- (i) the domain names are 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 domain names; and
- (iii) the domain names have been registered and are being used in bad faith.

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 names. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("<u>WIPO Overview 3.0</u>"), 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 Complainant's STRIPE trademark mark is reproduced and is recognizable within each of the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. <u>WIPO Overview 3.0</u>, section 1.7.

The addition of other terms, here "pro", and "pay", and an additional letter "p" either after the trademark or in between the trademark and other added terms, as well as the third-party mark PAYPAL does not prevent a finding of confusing similarity between the disputed domain names and the Complainant's mark. WIPO Overview 3.0, sections 1.8 and 1.12.

The Panel finds that 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 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.

Based on the available record, the Complainant has not authorized, licensed, or allowed the Respondent to use its STRIPE trademark in the disputed domain names or in any other way that would confer validity or legitimacy upon such use. It appears that the disputed domain names have not been used actively; they have been resolving to either inactive webpages reading "This site can't be reached" or to the parked webpage of the Registrar. Such passive holding of the disputed domain names does not confer rights or legitimate interests on behalf of the Respondent..

The Panel finds that the Respondent has no rights or legitimate interests with respect to the disputed domain names and that 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 basic Internet searches for the STRIPE mark return multiple links referencing the Complainant and its business. This, coupled with the way of the Respondent's construction of the disputed domain names, namely incorporating terms in the disputed domain names that explicitly reference the Complainant's field of business, in the view of the Panel indicates that the Respondent knew of the Complainant's trademark and registered the disputed domain names to target it. Paragraph 4(b)(iv) of the Policy; WIPO Overview 3.0, section 3.2.1.

Furthermore, in these circumstances, the Respondent's configuration of MX records associated with the disputed domain names, enabling sending potential fraudulent emails creates a real and ongoing threat to the Complainant and in the view of the Panel further supports the Respondent's bad faith.

The fact that the disputed domain names have not been used actively does not prevent a finding of bad faith under the doctrine of passive holding. WIPO Overview 3.0, section 3.3. In this context the Panel notes the distinctiveness and reputation of the Complainant's trademark in the relevant sector, the composition of the disputed domain names and the Respondent's failure to submit a response.

The Panel finds that the Complainant has established the third element of the Policy.

7. Decision

/Zoltán Takács/ Zoltán Takács Sole Panelist

Date: October 31, 2025