

## **ADMINISTRATIVE PANEL DECISION**

Stripe, Inc. v. Hannan Kyle  
Case No. D2025-3590

### **1. The Parties**

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

The Respondent is Hannan Kyle, United States.

### **2. The Domain Name and Registrar**

The disputed domain name <stripetrade.com> is registered with Ultrahost, Inc. (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 4, 2025. On September 5, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 6, 2025, 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 (Whois protection, this company does not own this domain name s.r.o.) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 8, 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 11, 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 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 2, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 3, 2025.

The Center appointed Scott R. Austin as the sole panelist in this matter on October 6, 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**

Without contest by Respondent, Complainant asserts in its Complaint as amended, and its Annexes attached provide evidence sufficient to support that:

Complainant is a technology company that provides online credit card payment and transaction processing services to businesses, from new startups to public companies in over forty countries, including the United States, under the trademark STRIPE (the “STRIPE Marks”). Complainant claims common law and statutory trademark rights through the use of its STRIPE Marks in connection with financial services and payment processing services throughout the United States, the EU, and around the world having gained widespread recognition through continuous use since at least as early as 2011.

Complainant holds trademark registrations for the STRIPE Mark in the United States and in Europe used in connection with Complainant’s online financial services, including:

1. United States Registration No. 4451679, STRIPE, registered on December 17, 2013, for “financial services, namely, online credit card payment and transaction processing and transmission of bills and payments thereof; financial services, namely, electronic funds transfer via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks” in International Class 36, and claiming a first use date of January 6, 2011.
2. European Union Registration No. 10112498, STRIPE, registered on December 14, 2011, for “[f]inancial services, namely online credit card payment and transaction processing and transmission of bills and payments thereof; financial services, namely, electronic funds transfer via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks” in International Class 36.

Complainant has also registered a number of domain names that incorporate the STRIPE Mark, including <stripe.com>, created on September 12, 1995, and used to access the official STRIPE Mark website at “www.stripe.com” (the “Official STRIPE Mark Website”) which Complainant uses to publish among other things, documentation, libraries, and API resources in connection with the STRIPE Marks.

The disputed domain name was created on March 2, 2025, and as of the date of the filing of the Complaint, was used to redirect consumers to a website landing page advertising financial services featuring online trading in cryptocurrency-affiliated goods and services under the STRIPE Mark and using the same stylized font used for Complainant’s design mark or logo (“Respondent’s Website”). Respondent’s Website also purports to offer a product called “Stripe Trade,” which Respondent claims to be associated or affiliated with Complainant when it is not. Respondent’s Website superficially offers counterfeit financial services under the STRIPE Mark and also appears to be using Respondent’s Website in furtherance of an illegal phishing scheme to collect user’s personal and financial information. Subsequent to the filing of the Complaint, the Respondent’s Website was removed and the disputed domain name currently resolves to an inactive website.

#### **5. Parties’ Contentions**

##### **A. Complainant**

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name. Complainant contends that the disputed domain name is identical or confusingly

similar to Complainant's trademark. Complainant contends it has well established registered and incontestable trademark rights in the STRIPE Marks, that prior panels have found them to be "well-known" and that the disputed domain name is confusingly similar because it incorporates the STRIPE Mark in its entirety. The addition of the term "trade" after the STRIPE Mark in configuring the disputed domain name does not prevent confusing similarity with Complainant's STRIPE Mark under the Policy, but, Complainant argues, Respondent's choice of the term "trade" to add to Complainant's STRIPE Mark to configure the disputed domain name, amplifies consumer confusion because "trade" is a term commonly associated with the financial services industry in which Complainant operates its business.

Complainant contends that Respondent has no rights or legitimate interests in respect of the disputed domain name because Respondent has no commercial relationship with Complainant or license to use the disputed domain name or STRIPE Marks, is not commonly known by the disputed domain name or the STRIPE Marks and Respondent currently uses the disputed domain name to redirect users to a website used for illegitimate purposes to impersonate Complainant and/or redirect users to Respondent's website for Respondent's commercial gain through Respondent's purported cryptocurrency trading business.

Finally, Complainant contends that the disputed domain name was registered and is being used in bad faith based on the unauthorized use of Complainant's widely recognized and well-known STRIPE Marks in the disputed domain name in order to attract Internet users to Respondent's website by creating a likelihood of confusion with Complainant and its STRIPE Marks as to the source, sponsorship, affiliation, or endorsement of Respondent's Website and its purported cryptocurrency trading. Further, Respondent has added "trade" to amplify this false association with Complainant, and to fraudulently imply that Respondent and its cryptocurrency business is affiliated with Complainant and its retail grocery store services. Combining Respondent's configuration of its disputed domain name using the STRIPE Mark in its entirety to imply affiliation with Complainant to pursue the illegitimate purposes for which the disputed domain name has been used as listed in Section 6 below is sufficient to show bad faith registration and use under the Policy.

## **B. Respondent**

Respondent did not reply to Complainant's contentions.

## **6. Discussion and Findings**

Paragraph 15 of the Rules provides that the Panel is to reach its decision on the basis of the statements and documents submitted in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

The onus is on Complainant to make out its case, and it is apparent, both from the terms of the Policy and the decisions of past UDRP panels, that Complainant must show that all three elements set out in paragraph 4(a) of the Policy have been established before any order can be made to transfer a domain name. As the proceedings are administrative, the standard of proof under the Policy is often expressed as the "balance of the probabilities" or "preponderance of the evidence" standard. Under this standard, an asserting party needs to establish that it is more likely than not that the claimed fact is true. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.2.

Thus, for Complainant to succeed, it must prove within the meaning of paragraph 4(a) of the Policy and on the balance of probabilities that:

1. the disputed domain name is identical or confusingly similar to a trademark or service mark in which Complainant has rights;
2. Respondent has no rights or legitimate interests in respect of the disputed domain name; and
3. the disputed domain name has been registered and is being used in bad faith.

The Panel finds that Complainant has met its burden in all three elements of the Policy and will deal with each of these elements in more detail below.

### **A. Identical or Confusingly Similar**

To prove this element, Complainant must first establish that there is a trademark or service mark in which it has rights. Ownership of a nationally registered trademark constitutes prima facie evidence that the complainant has the requisite rights in a mark for purposes of paragraph 4(a)(i) of the Policy. [WIPO Overview 3.0](#), section 1.2.1. It is evident that Complainant possesses widely recognized rights in the STRIPE Marks. Complainant has been utilizing the STRIPE Marks since 2011, promoting its online credit card payment and transaction processing through a range of online financial services products. The STRIPE Marks, in continuous use for decades, are protected by common law rights and statutory United States trademark registrations, thereby solidifying Complainant's exclusive rights. Sufficient evidence has been submitted in the form of electronic copies of valid and subsisting national trademark registration documents in the name of Complainant and therefore, Complainant has demonstrated it has rights in the STRIPE Marks. *Id.*; see *Advance Magazine Publishers Inc., Les Publications Conde Nast S.A. v. Voguechen*, WIPO Case No. [D2014-0657](#).

With Complainant's rights in the STRIPE Marks established, the remaining question under the first element of the Policy is whether the disputed domain name is identical or confusingly similar to Complainant's STRIPE Marks. It is well accepted that the first element functions primarily as a standing requirement and that the 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.

A side-by-side comparison between the STRIPE Mark and the disputed domain name shows that the disputed domain name incorporates Complainant's STRIPE Mark in its entirety and appends the trailing term "trade" followed by the generic Top-Level Domain ("gTLD") ".com." Prior UDRP panels have held that a domain name which wholly incorporates a complainant's registered mark is sufficient to establish identity or confusing similarity for purposes of the Policy despite the addition of other words to such encompassed marks. [WIPO Overview 3.0](#), section 1.8 ("Where the relevant trademark is recognizable within the disputed domain name, the addition of other terms [whether descriptive, geographical, pejorative, meaningless, or otherwise] would not prevent a finding of confusing similarity under the first element"); see also, *BNP Paribas v. Ronan Laster*, WIPO Case No. [D2017-2167](#); *WhatsApp Inc. v. Moose Scheib*, WIPO Case No. [D2019-0541](#); *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#).

Complainant further argues the addition of the "industry specific" term "trade" aids in creating confusion because "trade" refers to the act of buying or selling items for investment purposes on a trading platform such as the cryptocurrencies purportedly available for purchase or sale on Respondent's Website.

While Respondent's creation of the disputed domain name by appending the financial "industry specific" term "trade" to Complainant's STRIPE Mark in its entirety as used for Complainant's online financial services may bear on assessment of the second and third elements, the Panel finds the addition of such term within the disputed domain name does not prevent a finding of confusing similarity between the disputed domain name and Complainant's STRIPE Mark for the purposes of the first element of the Policy. Respondent's addition to Complainant's Mark of this term to form the disputed domain name would not prevent a finding of confusing similarity. Some UDRP panels have also used the addition of a term specific to a complainant's industry as a specific basis for finding confusing similarity. See, e.g., *Diageo Brands B.V., Diageo North America, Inc. and United Distillers Manufacturing, Inc. v. iVodka.com a.k.a. Alec Bargman*, WIPO Case No. [D2004-0627](#); *Gold Toe Brands Inc. v. Richard Jones*, WIPO Case No. [D2004-0923](#).

The addition of the generic Top-Level Domain (“gTLD”) “.com” is irrelevant in determining whether the disputed domain name is confusingly similar. [WIPO Overview 3.0](#), section 1.11.1. See, *Research in Motion Limited v. thamer Ahmed Alfarshooti*, WIPO Case No. [D2012-1146](#); see also *Cube Limited v. Super Privacy Service, c/o Dynadot*, WIPO Case No. [D2015-1325](#).

Based on the above, the Panel finds that the added term “trade” does not prevent a finding of confusing similarity between the disputed domain name and Complainant’s STRIPE Mark. Complainant’s widely recognized STRIPE Mark remains fully recognizable as incorporated in its entirety into the disputed domain name. The result is consistent with previous UDRP decisions, where additions to a well-known trademark have not been deemed sufficient to avoid confusing similarity. See, e.g., *Meta Platforms, Inc. et al. v. Abuz Hamal et al.*, WIPO Case No. [D2022-0212](#); and *PrivacyGuardian.org / NameSilo, LLC, Expired Domain*, WIPO Case No. [D2021-42258](#); see also *Oki Data Ams., Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#).

Accordingly, the Panel finds the disputed domain name is confusingly similar to the STRIPE Marks in which Complainant has rights. Complainant has satisfied its burden under paragraph 4(a)(i) of the Policy.

## **B. Rights or Legitimate Interests**

Under the second element of the Policy, Complainant has to make out a prima facie case that the respondent does not have rights to or legitimate interests in the disputed domain name, and if successful the burden of production on this element shifts to the respondent to come forward with relevant evidence demonstrating rights to or legitimate interests in the disputed domain name. If the respondent fails to come forward with such evidence, a complainant may be deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1. See also *The American Automobile Association, Inc. v. Privacy--Protect.org et al.*, WIPO Case No. [D2011-2069](#).

Paragraph 4(a)(ii) of the Policy also directs an examination of the facts to determine whether a respondent has rights or legitimate interests in a domain name. Paragraph 4(c) lists a number of ways in which a respondent may demonstrate that it does have such rights or legitimate interests.

The first example, under paragraph 4(c)(i), is where “before any notice to you of the dispute, your 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”.

Here, the annexes to the Complaint show that although the disputed domain name currently resolves to an inactive website and is passively held, at the time of the filing of the complaint, Respondent’s Website was configured by Respondent to pass itself off as a cryptocurrency trading platform website sponsored or endorsed by Complainant through incorporating Complainant’s STRIPE Mark into its disputed domain name. Complainant contends Respondent created such configuration to capitalize on Complainant’s established goodwill and brand recognition, as an apparent “bait and switch,” luring consumers with the famous STRIPE Mark to Respondent’s Website but then offering Respondent’s cryptocurrency services that have no connection with Complainant or its Mark whatsoever, to generate revenues from the sale of Respondent’s cryptocurrency products for Respondent’s commercial benefit. Complainant contends that Respondent furthers the false association with Complainant by displaying “STRIPE TRADE” using Complainant’s stylized font in its design mark as well as other clearly infringing content on Respondent’s Website.

Prior UDRP panels have held that the use of a domain name to confuse and attract Internet users through misuse of a well-known trademark, and the provision of content which promotes goods and services impersonating or competitive to Complainant cannot be considered use in connection with a bona fide offering of goods or services under Paragraph 4(c)(i). See e.g., *The Clorox Company v. WhoisGuard Protected, WhoisGuard, Inc. / Enos Villanueva, Melissa Rosenberg, Yang Ming*, WIPO Case No. [D2021-0603](#) and *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#).

Prior UDRP panels have also held that the use of a domain name for illegal activity involving impersonation and fraud (e.g., impersonation/passing off, phishing, unauthorized account access/hacking, or other types of fraud) can never confer rights or legitimate interests on a respondent. See [WIPO Overview 3.0](#), section 2.13. See also, *Springer Nature Limited v. Registration Private, Domains By Proxy, LLC / Collections Springer Nature*, WIPO Case No. [D2020-0955](#).

Applying the foregoing decision to these facts this Panel finds the disputed domain name is not being used in connection with a bona fide offering of goods or services sufficient to demonstrate Respondent has any rights or legitimate interests in the disputed domain name under the factors specified by paragraph 4(c)(i) of the Policy.

The second example, under paragraph 4(c)(ii), is a scenario in which a respondent is commonly known by the disputed domain name. Complainant states that it operates online payment processing and related online financial services but has no connection to blockchain or cryptocurrency trading (the subject of Respondent's Website accessed through the disputed domain name). Complainant and Respondent, therefore, have no commercial relationship. Neither has Complainant granted Respondent any license or authorization to use the STRIPE Marks for any purpose, including as a domain name. Prior UDRP panels have found a lack of rights or legitimate interests under the second element of the Policy based on such circumstances. See, e.g., *Charles Schwab & Co., Inc. v. Josh Decker d/b/a I GOT YOUR TIX*, WIPO Case No. D2005- 0179; *Guerlain S.A. v. H I Investments*, WIPO Case No. [D2000-0494](#).

Complainant also shows that Respondent is not commonly known by the disputed domain name because the original Respondent listed in the Whois record submitted with the initial Complaint displayed "Whois protection, this company does not own this domain name s.r.o.". The Registrar identified the underlying registrant in its verification process, "Hannan Kyle" of the United States, who has been substituted in the amended Complaint as the Respondent. Neither the original nor the substitute bears any resemblance to the disputed domain name whatsoever. Thus, there is no evidence in this case to suggest that Respondent is commonly known by the disputed domain name, that it is licensed or otherwise authorized to use Complainant's trademark, or that it has acquired any trademark rights relevant thereto. As such, the Panel finds this sub-section of the Policy is of no help to Respondent and the facts presented here support a lack of rights or legitimate interests in the disputed domain name. See *Expedia, Inc. v. Dot Liban, Hanna El Hinn*, WIPO Case No. [D2002-0433](#).

Finally, given Complainant's illegitimate use of the disputed domain name to create confusion with the well-known STRIPE Mark to pass itself off as Complainant for Respondent's commercial benefit, Respondent is not making a legitimate noncommercial or fair use of the disputed domain name, and therefore cannot benefit from subsection Paragraph 4(c)(iii).

In light of the above, and with no Response or other submission in this case to rebut Complainant's assertions and evidence, the Panel finds that the facts of this case demonstrate that Respondent has no rights or legitimate interests in the disputed domain name. Complainant has successfully met its burden under paragraph 4(a)(ii) of the Policy.

### **C. Registered and Used in Bad Faith**

Finally, Complainant must prove, by a preponderance of the evidence, that the disputed domain name has been registered and used in bad faith under paragraph 4(a)(iii) of the Policy. See, e.g., *Hallmark Licensing, LLC v. EWebMall, Inc.*, WIPO Case No. [D2015-2202](#).

Paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances that point to bad faith conduct on the part of a respondent. The panel may, however, consider the totality of the circumstances when analyzing bad faith under Policy, paragraph 4(a)(iii) and may make a finding of bad faith that is not limited to the enumerated factors in Policy, paragraph 4(b). See *Do the Hustle, LLC v. Tropic Web*, WIPO Case No. [D2000-0624](#).



First, Complainant contends that its STRIPE Marks are well-known in the industry and to the general public given their longevity of use and national market presence, especially in the United States where Respondent is located. Complainant further contends that fact that the disputed domain name incorporates the STRIPE Mark in its entirety, shows Respondent's actual knowledge of the STRIPE Mark. The STRIPE Marks have been in use for online payment processing and related online financial services and products for over 14 years dating back to 2011 and registered in the United States for over a decade before Respondent registered the disputed domain name. Complainant registered <stripe.com> domain name used to access its Official STRIPE Mark Website in 1995. Prior UDRP panels have found that where, as here, it would be implausible to believe that Respondent selected and was using the disputed domain name for any other purpose than to target Complainant's mark and trade on Complainant's trademark rights and reputation, Respondent was disrupting Complainant's business by diverting business and prospective business away from Complainant and its goods and services. Such activity in opposition to Complainant and disruptive to Complainant's business establishes a fact pattern that repeatedly has been held to constitute bad faith registration and use under paragraph 4(b)(iii) of the Policy. See *Galderma Holding S.A. v. Withheld for Privacy Purposes Privacy service provided by Withheld for Privacy ehf / Yves Aya*, WIPO Case No. [D2021-0981](#); see also *Philip Morris Products S.A. v. Rich Ardtea*, WIPO Case No. [D2020-0528](#).

Complainant next argues Respondent targeted it and its STRIPE Mark in selecting the term "trade" to append to the STRIPE Mark used by Complainant's to identify its wide range of financial services, because the term "trade" is associated with buying and selling investments such as the cryptocurrencies offered for trade on Respondent's Website. These circumstances support a finding of bad faith registration, because the Panel may reasonably conclude that Respondent employs the term "trade" to aid in creating consumer confusion allowing Respondent to impersonate Complainant and falsely associate its Stripe Trade cryptocurrency trades featured on Respondent's Website to further its illegitimate phishing scheme which constitutes bad faith use by Respondent.

Prior UDRP panels have held that a respondent's selection of a disputed domain name that comprises a complainant's mark in its entirety demonstrates a respondent's actual knowledge to support a finding of bad faith in registering and using the disputed domain name. See, e.g., *Lloyds Bank Plc v. Marc Wiese*, WIPO Case No. [D2015-0914](#); see also, *Heineken Brouwerijen B.V. v Mark Lott*, WIPO Case No. [D2000-1487](#). Moreover, panels have consistently found that the mere registration of a domain name that is identical or confusingly similar to a well-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. See [WIPO Overview 3.0](#), section 3.1.4. Complainant's STRIPE Mark has been found by prior UDRP panels to be well known. See *Stripe, Inc. v. Privacy Service Provided by Withheld for Privacy ehf / Joy Okoro*, WIPO Case No. [D2021-2288](#).

Finally, as noted in 6B. above, Respondent has intentionally configured the disputed domain name to enhance confusing similarity to Complainant's STRIPE Mark by adding the term "trade" to the STRIPE Mark and using the STRIPE Mark and logo on Respondent's Website to create a false association to direct or redirect consumers to Respondent's Website purportedly offering cryptocurrency services. Prior UDRP Panels have found these facts demonstrate a clear indication that Respondent abused Complainant's STRIPE Mark by incorporating it into the disputed domain name to create a likelihood of confusion as to the source, sponsorship, affiliation or endorsement of Respondent's website to intentionally attract Internet users to its website for Respondent's own commercial gain and, therefore, registered and used the disputed domain name in bad faith in violation of paragraph 4(b)(iv) of the Policy. See, e.g., *AXA SA v. Yang Ji Feng* WIPO Case No. [D2017-1299](#); *Royal Bank of Canada v. China Capital Investment Limited*, WIPO Case No. [D2017-1025](#); and *Travelscape, LLC v. WhoisGuard Protected, WhoisGuard, Inc. / Irwin Periola*, WIPO Case No. [D2020-2741](#).

The Panel finds Complainant's arguments and evidence persuasive and has received no arguments or evidence from Respondent to the contrary. Considering all the circumstances, the Panel concludes that Respondent has registered and used the disputed domain name in bad faith and Complainant has satisfied paragraph 4(a)(iii) 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 name <stripetrade.com> be transferred to the Complainant.

*/Scott R. Austin/*

**Scott R. Austin**

Sole Panelist

Date: November 9, 2025