

ADMINISTRATIVE PANEL DECISION

Batul Jafferji v. Ren Working
Case No. D2025-3820

1. The Parties

The Complainant is Batul Jafferji, United States of America ("US"), self-represented.

The Respondent is Ren Working, Indonesia.

2. The Domain Name and Registrar

The disputed domain name <chaoscleared.com> (the "Domain Name") is registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 19, 2025. On September 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On September 19, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. In accordance with Rules, Paragraph 4(d), on September 23, 2025, the Center sent a deficiency notice to the Complainant, to which it replied submitting an amended Complaint on September 23 and 27, 2025. The Center sent an email communication to the Complainant on September 30, 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 a final amended Complaint on October 1, 2025.

The Respondent sent email communications to the Center on October 1 and 2, 2025, to which the Complainant replied on October 3, 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 October 2, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 22, 2025. The Respondent did not submit any formal response. The Complainant sent an email communication to the Center on October 16, 2025.

The Center appointed Mathias Lilleengen as the sole panelist in this matter on October 31, 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 offers bags for storage under the trademark CHAOS CLEARED.

The trademark was registered in the US on August 20, 2019 (Registration No: 5839493). The Complainant is present on social media.

The Complainant had registered the Domain Name before the registration lapsed and the Domain Name was snapped up by the Respondent who registered it. The Complainant has documented that the Respondent has used the Domain Name to link to a web page that uses the Complainant's logo without authorization from the Complainant.

At the time of the Decision, the Domain Name resolves to an error page.

5. Parties' Contentions

A. Complainant

The Complainant provides evidence of trademark registration. The Complainant contends that the Domain Name is identical to the Complainant's trademark.

The Complainant argues that the Respondent has no rights or legitimate interests in respect of the Domain Name. The Complainant asserts that the Respondent is not affiliated with the Complainant and has no rights or legitimate interests in the Domain Name. The Respondent has not been commonly known by the term 'Chaos Cleared' and is not using the Domain Name for a bona fide offering of goods or services.

The Complainant believes that the Respondent was aware of the Complainant when the Respondent registered the Domain Name. The Respondent registered the Domain Name immediately after the Complainant's lapse, which demonstrates opportunistic bad faith. Furthermore, the Respondent displayed the Complainant's logo and information on the site, misleading consumers. The Respondent's negotiation refusal and explicit demand for USD 10,000 strongly support a finding of bad faith under the Policy.

B. Respondent

The Respondent did not send a formal response to the Complaint, but sent informal emails to the Center on October 1 and 2, 2025, stating "if this is the case you can pay for my domain at a price of \$5000", "I only sell this domain for 5000\$ because it is not my fault for buying this domain but it is the fault of the domain owner for letting this domain expire", and finally "In this case, you only need to pay for the chaoscleared.com domain through Namecheap, so there's no need to complicate things any further. Because I no longer use that domain."

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. See 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 CHAOS CLEARED. In this case, the Domain Name is identical to the Complainant's 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 identical 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. See [WIPO Overview 3.0](#), section 2.1.

Based on the evidence, 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 use of the Domain Name 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 it registered the Domain Name. It follows from the composition and use of the Domain Name, coupled with the communication by the Respondent. The Respondent has not offered any explanation as to why it registered a domain name identical to the Complainant's trademark, nor provided any evidence of actual or contemplated good faith use of the Domain Name. On the contrary, the Respondent's unauthorized use of the Complainant's logo and material is evidence of bad faith. The Respondent attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark. Moreover, the Respondent's offers to sell the Domain Name indicates that the Respondent registered the Domain Name primarily for the

purpose of selling Domain Name for valuable consideration in excess of documented out-of-pocket costs directly related to the Domain Name.

Based on the 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 <chaoscleared.com> transferred to the Complainant.

/Mathias Lilleengen/

Mathias Lilleengen

Sole Panelist

Date: November 12, 2025