

ADMINISTRATIVE PANEL DECISION

Substack, Inc. v. China Man
Case No. D2025-4256

1. The Parties

Complainant is Substack, Inc., United States of America ("United States"), represented by RWH Law Inc., United States.

Respondent is China Man, United States.

2. The Domain Name and Registrar

The disputed domain name <sso-substack.com> (the "Domain Name") is registered with Nicenic International Group Co., Limited (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 17, 2025. That same day the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On October 18, 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) and contact information in the Complaint. The Center sent an email communication to Complainant on October 22, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on October 23, 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 Respondent of the Complaint, and the proceedings commenced on November 3, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 23, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on November 24, 2025.

The Center appointed Harrie R. Samaras as the sole panelist in this matter on December 2, 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

Complainant provides a subscription/social media platform under the SUBSTACK Mark (the “Platform”). It has tens of millions of weekly visitors. Complainant’s services are globally known and have been widely and frequently reported in the press for many years.

Complainant owns various trademark registrations for the SUBSTACK Mark (or “the Mark”) including United States Trademark Registrations Nos. 5,554,882 (registered on September 4, 2018) and 7,126,577 (registered on August 1, 2023). It also owns at least one registration (e.g., United States Trademark Registration No. 6,846,016 registered on September 13, 2022) for a “stylized bookmark” (the “Bookmark-like Mark”). Also, Complainant registered and owns the <substack.com> domain name.

The Domain Name was registered on October 15, 2025. The contact information that Respondent provided the Registrar to obtain the Domain Name is dubious. That is: (1) the email address is maintained with “tiffincrane.com”, a provider of disposable email addresses (“They are often used by spammers and users who want to avoid giving their real email address.” Annex 13 of the Complaint); (2) the contact phone number, a toll-free phone number, has an automated greeting identifying itself as the leasing agent for an apartment building in Los Angeles. Annex 12 of the Complaint; and (3) the address does not appear to exist.

It is undisputed that around the time Respondent registered the Domain Name, the site associated with it provided a message designed to look like the Complainant’s login screen (e.g., it incorporated the Bookmark-like Mark, styling, font, colors). And an email targeting Complainant’s customers, incorporated the Mark and the Bookmark-like Mark and indicated it was from Complainant.

According to Complainant it appears that the Domain Name has resolved to various destinations. Currently, an attempt to connect elicited a “timed out” notification.

5. Parties’ Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name. Notably, Complainant contends the following:

The Domain Name is confusingly similar to the Mark insofar as it contains the entirety of the Mark with the addition of “sso” — text referring generically to “single sign-on” an authentication commonly used by Internet platforms. The top-level domain is not material to identity.

Respondent has no right or legitimate interest in the Domain Name. Respondent registered the Domain Name years after Complainant registered the Mark and years after Complainant established the Platform.

Respondent has only used the Domain Name for deceptive and fraudulent purposes. Respondent’s use of a privacy shield and fictitious identifying information in furtherance of fraud should further support a finding that Respondent lacks any right or legitimate interest in the Domain Name.

At the time of the phishing attack, visiting the Domain Name provided a message designed to appear like the Substack login screen. The deceptive <sso-substack.com> login page prominently featured Complainant's Bookmark-like mark, and in all respects was made to appear identical to the original Substack website (e.g., fonts, colors, and styling). The deceptive login page invited users to "Dispute" a purported automated account action on the Substack platform. On information and belief, clicking the "Dispute" button would ask users to provide their Substack account login information, which would then be collected by Respondent.

On October 15, the same day as the Domain Name's registration, Complainant's staff received a report from at least one of its users of phishing attempts based around the Domain Name. Complainant believes that users of the Platform have been deceived by this phishing scam into providing sensitive account login information to Respondent.

Respondent uses Cloudflare nameservers, and Complainant immediately reported the abusive scheme to Cloudflare's abuse team; however, it is unclear what action Cloudflare may have taken in response. Meanwhile (when this proceeding began), the Domain Name does not resolve to the deceptive page, and is instead being redirected to Complainant's genuine homepage, potentially as a means of obscuring its history of fraudulent use.

Registration and use of a confusingly similar domain name and creating a deceptively duplicated webpage for the purpose of fraud requires an awareness of the original domain name and webpage targeted by fraud. Such awareness is sufficient to evidence the intentionality envisioned by paragraph 4(b) of the Policy.

Further, the phishing scam described above inherently relies on the deceptive use of both of Complainant's marks to create confusion about the source of a webpage or communication.

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

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

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 Mark is reproduced within the Domain Name. Accordingly, the Domain Name is confusingly similar to the Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms here, "sso-" may bear on assessment of the second and third elements, the Panel finds the addition of such a term does not prevent a finding of confusing similarity between the Domain Name and the Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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 the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Domain Name. Respondent has not rebutted Complainant’s prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the Domain Name such as those enumerated in the Policy or otherwise.

In addition to the illegal activity discussed below, Respondent’s use of privacy shielding and dubious contact information in registering the Domain Name militate against Respondent having any rights or legitimate interests in the Domain Name.

Panels have held that the use of a domain name for illegal activity here, claimed and described above as impersonating or passing itself off as Complainant, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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.

Respondent registered the Domain Name at least seven years after Complainant registered the Mark and at least three years after Complainant registered the Bookmark-like Mark. Complainant has tens of millions of visitors weekly, the Platform is used by people worldwide, and Complainant has been reported in the press for a number of years. Respondent registered a confusingly similar domain name that incorporates Complainant’s well-known Mark simply adding the descriptive “sso-” meaning “single sign-on” which is an authentication commonly used by Internet platforms, such as Complainant’s. Respondent created a website that exhibits aspects of Complainant’s website using the Mark and the Bookmark-like Mark. Respondent didn’t waste any time after registering the Domain Name to target the Platform users, likely with the intention to defraud them. All of these activities require an awareness of the Mark, the Bookmark-like Mark, the Platform and Complainant. The Panel thus concludes based on the uncontroverted evidence of record that Respondent registered the Domain Name in bad faith.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent’s registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1. In addition to the illegal activity discussed below, Respondent’s use of privacy shielding and dubious contact information in registering the Domain Name strengthens Respondent’s bad faith use.

Panels have found that the non-use of a domain name, here not connecting to any webpage, would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness or reputation of Complainant’s Mark, and the composition of the Domain Name, and finds that in the circumstances of this case the current passive holding of the Domain Name does not prevent a finding of bad faith under the Policy.

Panels have held that the use of a domain name for illegal activity here, claimed and described above as impersonating or passing itself off as Complainant, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds Respondent's registration and use of the Domain Name constitutes bad faith under the Policy.

The Panel finds that 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 Domain Name <sso-substack.com> be transferred to Complainant.

/Harrie R. Samaras/

Harrie R. Samaras

Sole Panelist

Date: December 5, 2025