

## **ADMINISTRATIVE PANEL DECISION**

Reve AI, Inc. v. Alan Shen  
Case No. D2026-0087

### **1. The Parties**

The Complainant is Reve AI, Inc., United States of America (“United States”), represented by Waterman Legal, United States.

The Respondent is Alan Shen, China.

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

The disputed domain name <reve-ai.art> (the “Disputed 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 January 8, 2026. On January 9, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On January 9, 2026, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

The Center verified that the 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 January 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 16, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on February 20, 2026.

The Center appointed Gabriela Kennedy as the sole panelist in this matter on February 26, 2026. 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 software company that provides AI-powered tools that allow users to create and edit high-quality images from text prompts and image-to-image generation.

The Complainant owns trademark registrations for the REVE mark in a few jurisdictions. The relevant trademark registrations include the United States Trademark Registration No. 7994787 in Class 42 filed on March 27, 2025, and registered on October 21, 2025, and the International Trademark Registration No. 1883716 in Classes 9 and 42 registered on September 19, 2025 designating inter alia the United Kingdom (collectively, “the Complainant’s Trademark”). The Complainant asserts that its common law trademark rights in REVE date back to at least February 5, 2025, noting that its computer software and AI tools have been made available to consumers as early as this date, which has gained media coverage and recognition on social media.

The Complainant’s official websites can be found at <reve.com> and <reve.art> where the Complainant offers and advertises its software and AI tools (the Complainant’s Domain Names”). The Complainant’s Domain Names redirect Internet users to <app.reve.com> offering Reve AI image products (the “Complainant’s Website”).

The Disputed Domain Name was registered on March 22, 2025, shortly after the Complainant’s launch of its computer software and before the Complainant first registered the Complainant’s Trademark. At the time of the filing of the Complaint and the rendering of this Decision, the Disputed Domain Name resolved to a website that refers itself as “Reve AI” and advertises itself as a “powerful free online AI image generator that excels in prompting compliance, aesthetics, and typography” (the “Respondent’s Website”). The Respondent’s Website incorporates two buttons “Generate Images” and “Try Reve Art”, both of which redirect Internet users to <app.reve.com>, which is the Complainant’s Website mentioned above. On the landing page, a link to “Pollo AI” redirects Internet users to another website (“https://pollo.ai/?ref=mdrknzn”) offering similar AI tool for editing and generating images.

#### 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 Name.

Notably, the Complainant contends that:

- (a) The Disputed Domain Name is identical or confusingly similar to the Complainant’s Trademark. The Disputed Domain Name incorporates the Complainant’s Trademark in its entirety. The Disputed Domain Name combines the Complainant’s Trademark with the generic terms “art” and “ai” which directly relate to the Complainant’s AI image editing software.
- (b) The Respondent has no rights or legitimate interests in the Disputed Domain Name. The Respondent is not using the Disputed Domain Name in connection with a bona fide offering of goods and services. The Respondent’s aim in registering the Disputed Domain Name is to exploit the good will and success of the Complainant’s Trademark in order to drive consumers to the Respondent’s Website under the guise that the software advertised on such website is associated or approved by the Complainant, when that is not the case. The Respondent is not commonly known by the Disputed Domain Name.
- (c) The Respondent has registered the Disputed Domain Name and is using it in bad faith. The Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant’s Trademark as to the source, sponsorship, affiliation, or endorsement of the Respondent’s Website and of the product or service on the

Respondent's Website. The Respondent's Website uses the Complainant's Trademark to advertise the AI software for managing and editing images which is identical to the goods and services under the Complainant's Trademark. The Respondent registered the Disputed Domain Name a mere month and a half after the Complainant's first use of its trademark on February 5, 2025. It is clear that the Respondent's intent in registering the Disputed Domain Name was to unfairly capitalize on the Complainant's Trademark following the significant media attention upon the launch of the Complainant's Reve AI product.

## **B. Respondent**

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

## **6. Discussion and Findings**

Under paragraph 4(a) of the Policy, the Complainant is required to prove each of the following three elements:

- (i) the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and
- (iii) the Disputed Domain Name has been registered and is 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 Name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant asserts common law trademark rights in the REVE mark in connection with AI tools and software for editing and generating images, claiming use as early as February 5, 2025. The Complainant's Trademark was first registered on September 19, 2025, whereas the Disputed Domain Name was registered on March 22, 2025.

To establish unregistered or common law trademark rights for purposes of the UDRP, the complainant must show that its mark has become a distinctive identifier which consumers associate with the complainant's goods and/or services. ([WIPO Overview 3.1](#), section 1.3). Specific evidence including for example documented evidence of figures relating to sales, marketing, and/or social media endorsements supporting assertions of acquired distinctiveness should be included in the complaint. The length of time that the mark has been used is not itself determinative. Panels have noted that some brands may rapidly acquire recognition due to a broad and significant Internet presence and user base ([WIPO Overview 3.1](#), section 1.3).

The Complainant has provided evidence of press coverage and social media recognition following the launch of its "Reve Image" AI software. The Panel observes that those articles and social media posts referring to the Reve Image product were mostly published in and around March 2025. In particular, the Complainant has provided two social media posts predating the registration of the Disputed Domain Name: one dated March 20, 2025, identifying the "Reve Image 1.0" model as the new "mysterious Halfmoon text-to-image model", which is a reply to an earlier post dated March 14, 2025, referencing "Halfmoon". The Panel considers that the evidence provided by the Complainant supports that the Complainant has accrued common law trademark rights in REVE since March 2025. Moreover, given the trademark registrations set forth in Section 4 of this Decision above showing trademark registrations, the Panel accepts that the Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the Complainant's Trademark is reproduced within the Disputed Domain Name. Furthermore, the generic Top-Level Domain in this case ".art" may be disregarded for the purposes of assessing confusing similarity under the first element. Accordingly, the Disputed Domain Name is confusingly similar to the Complainant's Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms (here, a hyphen and "ai") may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the Disputed Domain Name and the Complainant's Trademark for the purposes of the Policy. [WIPO Overview 3.1](#), 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 that 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 3.1](#), section 2.1.

In the present case, the Respondent did not submit a Response. The fact that the Respondent did not submit a Response does not automatically result in a decision in favor of the Complainant. However, the Respondent's failure to file a Response may result in the Panel drawing appropriate inferences from such default. The Panel may also accept all reasonable and supported allegations and inferences flowing from the Complainant as true (see *Entertainment Shopping AG v. Nischal Soni, Sonik Technologies*, WIPO Case No. [D2009-1437](#); and *Charles Jourdan Holding AG v. AAJM*, WIPO Case No. [D2000-0403](#)).

The Panel notes that there is no evidence on the available record to show that the Respondent has trademark rights corresponding to the Disputed Domain Name, or that the Respondent has become commonly known by the Disputed Domain Name. The Panel further notes that the Complainant has provided no license or authorization of any kind to the Respondent to use the Complainant's Trademark or to apply for or use any domain name incorporating the Complainant's Trademark. The Respondent would likely not have adopted the Complainant's Trademark if not for the purpose of creating an impression that the Disputed Domain Name is associated with, or originates from the Complainant. The reproduction of the Complainant's Trademark with the additional term "ai", combined with the use of the Complainant's Trademark on the Respondent's Website and the links redirecting users to the Complainant's Website also lead to a risk of implied affiliation as the Disputed Domain Name effectively impersonates or suggests sponsorship or endorsement by the Complainant.

The Panel notes that the Respondent is using the Disputed Domain Name to advertise an AI tool with a similar name, "Reve AI Image Generator" and "Reve Art Image 1.0" for generating and editing images. The Respondent's Website also features the Complainant's Trademark and holds itself out as "Reve AI". When Internet users click the "Generate Images" or "Try Reve Art" button on the Respondent's Website, they are redirected to the Complainant's Website (at <app.reve.com>). Additionally, the Respondent's Website includes a link to "Pollo AI", a third-party AI tool offering similar image editing and generation functions that may compete with the Complainant's Reve AI product. The redirection to the Complainant's Website demonstrates that the Respondent has no genuine business of its own associated with the Disputed Domain Name. Furthermore, the inclusion of a link to a competing AI service suggests that the Respondent is using the Disputed Domain Name to capitalise on the reputation of the Complainant's Trademark to generate traffic

and to divert business away from the Complainant, potentially deriving commercial gain through affiliate arrangements with a competing third party. Panels have held that the use of a domain name to redirect users to a competing site would not support a claim to rights or legitimate interests. ([WIPO Overview 3.1](#), section 2.5.3). The Respondent's conduct in using the Complainant's Trademark to attract users and then directing them either to the Complainant's Website or to a competing website is inconsistent with a bona fide offering.

Panels have held that the use of a domain name for illegitimate activity here, claimed passing off can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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 Name. 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 Name such as those enumerated in the Policy or otherwise.

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 composition of the Disputed Domain Name (which incorporates the Complainant's Trademark in its entirety together with the term "ai" that directly corresponds to the Complainant's field of activity), the timing of the registration of the Disputed Domain Name (occurring shortly after media attention surrounding the Complainant's Reve AI product), and the Respondent's conduct in using the Disputed Domain Name to advertise an AI tool with a similar name and redirect users to both the Complainant's Website and a competing website (Pollo AI), support an inference that the Respondent was aware of, and has registered the Disputed Domain Name with the intent to unfairly capitalise on the Complainant's nascent trademark rights ([WIPO Overview 3.1](#), section 3.8.2).

The Panel notes that it is difficult to conceive of any plausible use of the Disputed Domain Name by the unaffiliated Respondent that would amount to good faith use given that the Respondent's Website repeatedly displays the Complainant's Trademark and provides tabs which redirect Internet users to the Complainant's Website (at <app.reve.com>) and a third-party competing AI tool (Pollo AI) offering similar image editing and generation functions. The Respondent is capitalizing on the goodwill associated with the Complainant's Trademark to mislead and divert Internet users to the Respondent's Website for commercial gain by creating a likelihood of confusion with the Complainant's Trademark. ([WIPO Overview 3.1](#), section 3.1.4). Further, the Respondent failed to respond to the Complainant's contentions and has provided no evidence of any actual or contemplated good faith use of the Disputed Domain Name.

Panels have held that the use of a domain name for illegitimate activity here, claimed passing off constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the Disputed Domain Name 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 Name <reve-ai.art> be transferred to the Complainant.

*/Gabriela Kennedy/*

**Gabriela Kennedy**

Sole Panelist

Date: March 13, 2026