

ADMINISTRATIVE PANEL DECISION

Reve AI, Inc. v. Phoenix Wan
Case No. D2026-0090

1. The Parties

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

The Respondent is Phoenix Wan, China.

2. The Domain Name and Registrar

The disputed domain name <reve-ai.net> 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 12, 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 15, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 4, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on February 6, 2026.

The Center appointed Fabrizio Bedarida as the sole panelist in this matter on February 10, 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, Reve AI Inc., 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's official website can be found at the domain names <reve.com> and <reve.art> where it offers and advertises its software, AI tools and services.

The Complainant provided a list of the REVE trademark registrations and applications, including inter alia:

United States trademark REVE (word) registration No. 7994787 filed on March 27, 2025, and registered on October 21, 2025, with a first use date of February 5, 2025;

International trademark REVE (word) registration No. 1883716 registered on September 19, 2025.

The Complainant has provided press releases, articles, printouts of web pages from the Internet and screenshots of social media showing use of the trademark, and has thus claimed to enjoy common law rights in the REVE trademark as early as February 5, 2025, in connection with its AI tools and software.

The trademark is registered for computer software for editing, managing, and generating visual content using AI tools and related services.

The REVE computer software and AI tools have been available to consumers since at least as early as February 5, 2025. According to the Complainant the launch of its computer software created immediate excitement and attention in the media, with REVE being recognized as “the new best AI image generation model” and for its “impressive results in comparative testing against established models at a fraction of the cost”. Consequently, the Complainant asserts and documents that despite the fact that REVE only became available to consumers in February 2025, the Complainant's REVE platform had already become widely well-known in the software industry and is uniquely associated with the Complainant and its goods and services.

The disputed domain name was registered on March 25, 2025. Based on the evidence submitted by the Complainant, the disputed domain name previously resolved to a website displaying the REVE trademark and advertising, under the title “Reve AI – AI-Powered Image & Text-to-Video Generator,” AI software for generating and editing images.

At the time of this Decision, the disputed domain name resolves to “www.animateimage.net/models/reve-ai”, a page displaying the REVE trademark and advertising, under the title “Reve AI Image Generator 1.0 – Powered by Halfmoon AI – #1 Ranked Text-to-Image Model,” AI software for generating and editing images.

“Halfmoon” is the codename for the Reve Image 1.0 model.

5. Parties' Contentions

A. Complainant

Notably, the Complainant contends that the addition of the term “ai” in the disputed domain name is not sufficient to prevent the finding of confusing similarity with the Complainant's trademark. On the contrary, the Complainant affirms that the use of the generic term “ai”, which is related to the Complainant's services, increases the similarity between the Complainant's trademark and the disputed domain name; that the Respondent's use of the disputed domain name for a website displaying the Complainant's REVE trademark to promote and offer services identical to those of the Complainant under the name “Reve ai” is an apparent attempt to impersonate the Complainant or to suggest an affiliation with the Complainant, and this does not give rise to rights or legitimate interests; and that bad faith registration and use should be found, as the Respondent registered the disputed domain name and used the Complainant's REVE trademark on the

corresponding website while being aware of the Complainant's trademark rights, with the intent to take advantage of and capitalize on the Complainant's well-known trademark.

The Complainant points out that the disputed domain name was registered soon after the Complainant's launch of its REVE computer software and AI tools, which created immediate excitement and attracted media attention, noting that previous panels have often found that a respondent has acted in bad faith when registering domain names shortly after a spike in media attention in connection with a complainant's product launch.

B. Respondent

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

6. Discussion and Findings

In order for the Complainant to obtain a transfer of the disputed domain name, paragraph 4(a) of the Policy requires that the Complainant must demonstrate to the Panel that:

- (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, Third Edition ("[WIPO Overview 3.0](#)"), 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 Panel finds the mark is reproduced and recognizable within the disputed domain name. Accordingly, the disputed 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, "ai", may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed 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 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. Both the composition and use of the disputed domain name create a risk of implied affiliation with the Complainant. [WIPO Overview 3.0](#), section 2.5.

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.

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.

The third element of paragraph 4(a) of the Policy requires that the Complainant demonstrate that the Respondent registered and is using the disputed domain name in bad faith. In this case it appears that the disputed domain name has a registration date predating the Complainant's date for its first trademark application and subsequent registration. This circumstance raises the question of whether the disputed domain name was registered in bad faith. The Complainant has alleged that the disputed domain name was registered (on March 25, 2025) after the Complainant had launched its own REVE computer software and AI tools, which had been available to consumers since at least as early as February 5, 2025. The Complainant has also claimed and documented that the launch of its REVE computer software created immediate excitement and attention in the media and on social media and that despite the fact that it only became available to consumers in February 2025, the Complainant's REVE platform had already become known in the software industry and was uniquely associated with the Complainant and its goods and services at the time of the registration of the disputed domain name.

The question of whether there can be bad faith registration and use of a domain name that predates any registered trademark relied upon is addressed in section 3.8.1 of the [WIPO Overview 3.0](#), which states that, generally speaking, although a trademark can satisfy the Policy's first element irrespective of its date, when a domain name is registered by a respondent before the complainant's relied-upon trademark right is shown to have been first established, the registration of the domain name would not have been in bad faith because the registrant could not have contemplated the complainant's then non-existent right. However, the commentary in [WIPO Overview 3.0](#), section 3.8.2, explains that: as an exception to the general proposition described above in [WIPO Overview 3.0](#), section 3.8.1, in certain limited circumstances where the facts of the case establish that the respondent's intent in registering the domain name was to unfairly capitalize on the complainant's nascent (typically as yet unregistered) trademark rights, panels have been prepared to find that the respondent has acted in bad faith.

Such scenarios include registration of a domain name: (i) shortly before or after announcement of a corporate merger, (ii) further to the respondent's insider knowledge (e.g., a former employee), (iii) further to significant media attention (e.g., in connection with a product launch or prominent event), or (iv) following the complainant's filing of a trademark application.

Here, the Panel observes that, based on the evidence, when registering the disputed domain name, the Respondent was most likely aware of the Complainant's REVE computer software and AI tools, as well as of its use and immediate success.

From a review of the available records, the Panel accepts that in the present case there had been trademark-like use of the term "REVE" as evidenced via the social media commentary and documented media reporting, prior to the time that the disputed domain name was registered, and that the disputed domain name was registered with knowledge of that use and with the intention of taking advantage of the reputation that had or would attach to that term by reason of that use. Both the composition and use of the disputed domain name support this finding. The disputed domain name comprises the Complainant's trademark plus the term "ai", which is exactly the service the Complainant provides. Further, the disputed domain name has been used to purportedly offer AI-generated image services, again exactly replicating the Complainant's services. Therefore, the fact that at that time the Complainant had not applied for or obtained a registered trademark for that term does not prevent a finding of bad faith registration and use in this case. It appears that the Respondent's purpose for the registration of the disputed domain name was to misleadingly divert users seeking the Complainant's products to the Respondent's website for commercial gain by creating a likelihood of confusion with the Complainant's trademark.

In conclusion, the Panel finds, on the balance of the probabilities, that the Respondent registered and is using the disputed domain name in bad faith. Accordingly, the Complainant has satisfied the third element of 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.net> be transferred to the Complainant.

/Fabrizio Bedarida/

Fabrizio Bedarida

Sole Panelist

Date: February 16, 2026