

ADMINISTRATIVE PANEL DECISION

Clover Network, LLC v. Paradigm Services
Case No. D2026-0601

1. The Parties

The Complainant is Clover Network, LLC, United States of America (“United States”), represented by Fiserv, Inc., United States.

The Respondent is Paradigm Services, United States.

2. The Domain Names and Registrar

The disputed domain names <clovercapitalpr.com>, <cloverpayrollpr.com>, and <cloverpayrollusvi.com> are registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 12, 2026. On February 13, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On February 13, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Registration Private, DomainsByProxy.com) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 17, 2026, 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 amendment to the Complaint on the same day.

The Center verified that the Complaint together with the amendment to 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 February 18, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 10, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 16, 2026.

The Center appointed William F. Hamilton as the sole panelist in this matter on March 18, 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 Clover Network, LLC, a United States company and part of Fiserv, Inc., a global provider of financial services technology. Since commencing operations in 2012, the Complainant has developed a widely used point-of-sale and payment processing platform under the CLOVER mark, which is used in connection with financial services, payment processing, and related software solutions.

The Complainant owns multiple trademark registrations for the mark CLOVER, including United States registrations such as CLOVER, United States Registration No. 4227414, registered on October 16, 2012; CLOVER, United States Registration No. 4498129, registered on March 18, 2014; and CLOVER, United States Registration No. 4498176, registered on March 18, 2014.

These registrations cover, inter alia, payment processing services, business management services, and computer hardware and software systems. The Complainant's CLOVER mark is used extensively in commerce and has become well known in connection with financial and payment services. The Complainant promotes its services through its website "www.clover.com" and other channels and processes substantial volumes of payment transactions.

The Complainant also owns trademark registrations for the distinctive CLOVER logo, which it uses extensively in connection with its products and services. In addition, the Complainant owns a portfolio of trademark registrations incorporating the CLOVER mark as the dominant element (including, for example, CLOVER CONNECT and CLOVER SPORT), further reinforcing the distinctiveness and recognition of the CLOVER brand.

The disputed domain names were registered as follows: <cloverpayrollpr.com> on August 5, 2017; <clovercapitalpr.com> on April 4, 2018; and <cloverpayrollusvi.com> on August 5, 2017. The <clovercapitalpr.com> and <cloverpayrollpr.com> websites prominently display the Complainant's CLOVER mark and logo and mimic the Complainant's branding and services, including financial-related offerings, particularly targeting users in Puerto Rico, United States. The disputed domain name <cloverpayrollusvi.com> currently resolves to a "coming soon" or inactive webpage.

The Respondent did not submit a Response to the Complainant.

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 names.

The Complainant contends that the disputed domain names are confusingly similar to its CLOVER trademark, as they incorporate the mark in its entirety, merely adding descriptive terms such as "payroll" and "capital" and geographic identifiers "pr" and "usvi", presumably a reference to the United States Virgin Islands, United States.

The Complainant asserts that the Respondent has no rights or legitimate interests in the disputed domain names. The Respondent is not affiliated with, authorized by, or otherwise permitted to use the Complainant's CLOVER mark. The Respondent has used the disputed domain names to host websites that

mimic the Complainant, including reproducing the Complainant's logo and presenting services in a manner that falsely suggests association with the Complainant.

The Complainant further contends that the disputed domain names were registered and are being used in bad faith. The Respondent has intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's mark. The Respondent's use of the Complainant's branding and presentation of competing or related services demonstrates knowledge of the Complainant and targeting of its CLOVER mark.

B. Respondent

The Respondent did not reply to the 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 Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark CLOVER for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

Each of the disputed domain names incorporates the Complainant's CLOVER mark in its entirety. The addition of the descriptive terms "payroll" and "capital" and the geographic terms "pr" and "usvi" does not prevent a finding of confusing similarity. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms "payroll", "capital", and the geographic terms "pr" and "usvi" 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 mark 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.

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

The record reflects that the Respondent has used the disputed domain names to host websites that prominently display the Complainant's CLOVER mark and logo and offer services similar to those of the Complainant. These websites are designed to mimic the Complainant's official offerings and create the false impression of affiliation or endorsement. The composition of the disputed domain names reflects a deliberate attempt to replicate the Complainant's branding and domain naming conventions. The addition of geographic terms in this case increases the risk of affiliation by suggesting services or geographic markets associated with the Complainant. Such use does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use. The Panel therefore finds that the Respondent lacks rights or legitimate interests in the disputed domain names.

The Panel finds the second element of the Policy has been established.

C. Registered and Used 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 3.1](#), section 3.2.1.

The disputed domain names were registered well after the Complainant had established registered rights in the CLOVER mark. The Panel finds that the Respondent registered and used the disputed domain names with knowledge of the Complainant and its CLOVER mark. The Respondent has used the disputed domain names <clovercapitalpr.com> and <cloverpayrollpr.com> to host websites that reproduce the Complainant's trademark and logo and offer financial services closely related to those of the Complainant. The services offered on the Respondent's websites, including payroll and capital-related financial services, are closely related to the Complainant's payment processing and business management offerings, further reinforcing the likelihood of confusion. This conduct demonstrates clear targeting of the Complainant.

The use of these disputed domain names to impersonate the Complainant, including reproducing its branding and presenting services in a manner suggesting affiliation, is a strong indicator of bad faith. The Respondent's reproduction of the Complainant's distinctive CLOVER logo on the associated websites further confirms that the Respondent had actual knowledge of the Complainant and intentionally sought to impersonate it.

The Panel further notes that the structure of the disputed domain names, including the use of the term "payroll" in combination with the Complainant's CLOVER mark, mirrors the Complainant's own domain naming conventions (e.g., "cloverpayroll.com"). This reinforces the conclusion that the Respondent deliberately sought to create a domain name that would appear to Internet users as an official or affiliated website of the Complainant.

By using the disputed domain names in this manner, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the websites and services offered therein. This constitutes bad faith under paragraph 4(b)(iv) of the Policy.

With respect to the disputed domain name <cloverpayrollusvi.com>, the Panel notes that the domain name currently resolves to an inactive or "coming soon" page. However, in light of the Respondent's conduct with the other disputed domain names, the composition of the domain name incorporating the Complainant's distinctive mark, and the absence of any plausible good faith use, the Panel finds that the passive holding of

this disputed domain name does not prevent a finding of bad faith under the Policy. [WIPO Overview 3.1](#), section 3.3.

Taken together, the totality of the circumstances supports a finding that the disputed domain names were registered and are being used in bad faith.

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 names <clovercapitalpr.com>, <cloverpayrollpr.com>, and <cloverpayrollusvi.com> be transferred to the Complainant.

/William F. Hamilton/

William F. Hamilton

Sole Panelist

Date: April 1, 2026