

ADMINISTRATIVE PANEL DECISION

Green Dot Corporation v. Cyber Capital Technology, Ltd
Case No. D2026-0947

1. The Parties

The Complainant is Green Dot Corporation, United States of America (“United States”), represented by CSC Digital Brand Services Group AB, Sweden.

The Respondent is Cyber Capital Technology, Ltd, Hong Kong, China, represented by Cylaw Solutions, India.

2. The Domain Name and Registrar

The disputed domain name <rapidpay.com> is registered with Rabbitsfoot.com LLC d/b/a Oxygen.nyc (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 5, 2026. On March 5, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 9, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 10, 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 amended Complaint on March 12, 2026.

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 March 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 5, 2026. After Respondent’s request on April 3, 2026, an automatic extension to file response was granted. The Response was filed with the Center on April 7, 2026.

The Center appointed Wilson Pinheiro Jabur, Harini Narayanswamy and Gerald M. Levine as panelists in this matter on May 1, 2026. The Panel finds that it was properly constituted. Each member of 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.

The Complainant filed an Unsolicited Supplemental Filing on April 15, 2026. The Respondent filed an Unsolicited Supplemental Filing on May 3, 2026.

4. Factual Background

The Complainant, founded in 1999 and based in the United States, is a financial and bank holding company that renders services such as debit, checking, credit, prepaid and employer payroll cards, in addition to money processing services, tax refunds, cash deposits and disbursements.

In the third quarter of the year 2025, the Complainant declared a total operating revenue of USD 1,5 million and a total of current assets over USD 2,5 million (Annex 6.2 to the Complaint).

The Complainant operates as its primary domain names <greendot.com> and <rapidpaycard.com>. The Complainant is the owner, amongst others, of the following trademark registrations:

- United States trademark registration No. 3,165,975 for the word mark RAPID! PAYCARD, filed on January 22, 2004, registered on October 31, 2006, successively renewed, in class 36; and
- United States trademark registration No. 3,247,918 for the word mark RAPID!, filed, on November 4, 2003, registered on May 29, 2007, successively renewed, in class 36.

The Complainant acquired the RAPID! PAYCARD solution on January 25, 2017, having had the aforementioned trademark registrations assigned to it on November 2018.

The disputed domain name was registered on May 31, 2015, and acquired by the Respondent on August 29, 2015. Presently, the disputed domain name is being offered for sale for USD 199,998.

The Respondent is based in Hong Kong, China, and trades descriptive, common-word and brandable domain names for development or sale.

5. Parties' Contentions

A. Complainant

The Complainant asserts to be well recognized and respected worldwide and in its industry, having made significant investments in advertising and promotion of its trademark in the media and over the Internet through the years, thus, having developed substantial goodwill in the RAPID! PAYCARD and RAPID! brands, which have become distinctive and uniquely associated with the Complainant and its products and services. Furthermore, the Complainant asserts to be a leading corporation in the fintech industry with a market capitalization of approximately USD 0.64 billion as of February 2026 (Annex 6.3 to the Complaint), being its innovative payroll solutions through its Rapid! brand expanding and continuously supporting more than 7,000 employers.

Under the Complainant's view, the disputed domain name is a combination of the Complainant's RAPID! trademark and the generic term "pay", together forming the term "rapidpay", not avoiding the omission of the term "card" a finding of confusing similarity with the Complainant's RAPID! PAYCARD and RAPID! trademarks. Furthermore, the Complainant points out that the removal of the exclamation mark does nothing to distinguish the disputed domain name from the Complainant's trademarks, not diminishing the confusing similarity between them.

As to the Respondent's lack of rights or legitimate interests, the Complainant argues that:

- the Respondent is not sponsored by or affiliated with the Complainant in any way;
- the Complainant has not given the Respondent permission to use the Complainant's trademarks in any manner, nor has the Complainant licensed, authorized, or permitted the Respondent to register domain names incorporating the Complainant's trademark;
- the Respondent is not commonly known by the disputed domain name; and
- the Respondent is not actively using the disputed domain name, rather offering it for sale for an amount that far exceeds the Respondent's out-of-pocket expenses in registering the disputed domain name.

As to the Respondent's bad faith registration and use of the disputed domain name, the Complainant contends that its RAPID! PAYCARD and RAPID! trademarks are known internationally, with trademark registrations in the United States, having the Complainant marketed and sold its goods and services using this trademark since 2004, which is well before Respondent's registration of the disputed domain name.

Under the Complainant's view, by registering a domain name that incorporates the dominant part of its RAPID! PAYCARD and RAPID! trademarks, the Respondent has created a domain name that is confusingly similar to the Complainant's trademarks, as well as prior domain name, thus demonstrating that the Respondent had a knowledge of and familiarity with the Complainant's brand and business.

Furthermore, the Respondent's offer to sell the disputed domain name for valuable consideration in excess of his out-of-pocket expenses further corroborates the Respondent's bad faith conduct. Lastly, the Complainant points out that the Respondent ignored the Complainant's attempts to resolve this dispute outside of this administrative proceeding, failing to reply to the Complainant's cease-and-desist letter and subsequent reminders, that is another indicator of the Respondent's bad faith registration and use of the disputed domain name.

In its Unsolicited Supplemental Filing, the Complainant contends that it can claim rights back to 2006, 2007 given the registration dates of the trademark registrations later assigned to it. The Complainant acknowledges that the terms "rapid" and "pay" are dictionary words on their own; however, the combination of them together is not descriptive or dictionary and the Respondent's choice to register the disputed domain name combining these terms was not coincidental, particularly taking into consideration the Complainant's long-lasting domain name. The Complainant further reiterates its understanding that the Respondent has not demonstrated any use of the disputed domain name or a name corresponding to the disputed domain name in connection with a bona fide offering of goods or services given that the disputed domain name is being listed for sale for USD 199,998, an excessive amount far higher than the Respondent's out-of-pocket expenses for registering it. The Complainant also submits that the searches conducted on a restricted date range search from January 2015 to September 2015 on <google.com.hk>, reveals multiple links referencing the Complainant and its business, what demonstrates the Complainant's fame, including in the jurisdiction where the Respondent claims to be located. Lastly, the Complainant highlights the sensitive nature of its business as part of the finance industry, which further increases the potential for fraudulent use of the disputed domain name, such as phishing and/or impersonation.

B. Respondent

The Respondent asserts that the disputed domain name consists of "Rapid Pay", a plainly descriptive phrase that refers to fast or instant payment services, a concept widely used across the financial and payment industries, such as international bank transfers facilitated through the SWIFT network, not being "rapid" an exclusive, coined or uniquely associated with the Complainant. The Respondent further asserts to have registered the disputed domain name for its clear descriptive meaning and general commercial appeal, not to target the Complainant or any alleged trademark rights, in alignment with what Panels have consistently recognized that domain names consisting of dictionary words or descriptive phrases may be lawfully registered and held for their inherent value, particularly by domain investors.

The Respondent further rebuts the Complainant's assertion to be the owner of trademark across various jurisdictions given that the Complainant only produced evidence of two trademark registrations in the United States, which were assigned to the Complainant in November 2018, and which do not constitute a "global protection".

The Respondent further points out that the registration for RAPID! PAYCARD has received a disclaimer as to "paycard" and, thus, the Complainant's distinctive character of its trademark lies on the exclamation mark, given that the word "rapid" directly describes a quality or characteristic of the services, and therefore, any attempt to stretch the protection to cover the plain, unadorned word "rapid", or combinations thereof such as "Rapid Pay" go well beyond the scope of the registered marks and must be rejected.

In addition to that, the Respondent contends that the Complainant operates in the payroll card and prepaid debit card sector, a market that is heavily regulated, jurisdiction-specific, and shaped by local banking, payments, and employment law; tied to United States employment and payroll infrastructure; and not the kind of universally consumed good or globally distributed service that might give rise to cross-border reputation even without formal international trademark registrations.

Moreover, the Respondent points out that the Complainant launched (or rebranded) a mobile application under the combination "Rapid! Pay" only in the last quarter of 2020, which is five years after the Respondent acquired the disputed domain name and the Complainant cannot credibly contend that the Respondent could have the Complainant in mind when registering the disputed domain name.

The Respondent further submits not to have ever solicited the Complainant or used the disputed domain name to interfere with, prejudice or harm the Complainant or in any way; rather, always having acted in good faith and with a legitimate interest in the disputed domain name for its descriptive meaning, as a domain name investor.

The Respondent also points out that an online research shows that "Rapid Pay" is used globally in contexts unrelated to the Complainant, in varied sectors. According to "www.opencorporates.com", there are 26 different companies registered with "Rapid Pay" in their corporate name across multiple countries and jurisdictions (Annex-VI(a) to the Response), what further indicates that RAPID and RAPID PAY are not uniquely associated with the Complainant.

As to the offer for sale, the Respondent's indicates that such, in itself, does not constitute a violation of the Policy, especially in this case where the disputed domain name was acquired by the Respondent for its inherently descriptive character, there being a legitimate interest in its potential sale for a profit.

Another point argued by the Respondent is that the other domain names indicated by the Complainant, also held by the Respondent, are all part of the Respondent's portfolio of common dictionary words, names and descriptive phrases which do not constitute examples of cybersquatting.

As to the lack of reply to the Complainant's cease-and-desist letters, the Respondent indicates not having received them.

Lastly, the Respondent requests that the Complainant should be found guilty of Reverse Domain Name Hijacking ("RDNH") given that the Complainant, assisted by specialized counsel, should have known when researching and preparing the Complaint that it could not have prevailed given that the disputed domain name was acquired by the Respondent in 2015, while the Complainant was assigned trademarks in 2018 and never made use of sole combination "Rapid Pay" its business until it renamed its mobile app in 2020 to Rapid! Pay.

In its Unsolicited Supplemental Filing, the Respondent requests that the Complainant's Unsolicited Supplemental Filing be disregarded given that there were no "exceptional circumstances" that would have allowed for such given that all points brought therein were not new and ought to have been presented at the time of the filing of the Complaint, not being it possible for a Complainant, represented by counsel to file a

skeletal complaint, await a response that identifies its weaknesses, and then seek to remedy those weaknesses through supplemental submissions.

In addition to rebutting each of the Complainant's submissions, the Respondent indicates that the restricted date range search conducted by the Complainant from January 2015 to September 2015 on <google.com.hk>, does not reconstruct historical search results, rather Google applying its current ranking algorithms and current index data to a filtered subset of results carrying a date metadata signal, which is itself unreliable and frequently inaccurate given that the snippets, rankings, and URLs visible in such a screenshot reflect how Google's present-day infrastructure processes the query, not what any user would have seen on "www.google.com.hk" in August 2015.

6. Discussion and Findings

According to paragraph 4(a) of the Policy, in order to succeed, a complainant must establish each of the following elements:

- (i) the disputed domain name is identical or confusingly similar to the trademark or service mark in which the complainant has rights;
- (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 Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

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

The Panel finds the mark is 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 3.1](#), section 1.7.

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

B. Rights or Legitimate Interests

Based on the available record and as further discussed below, the Panel finds that the Respondent acquired the disputed domain name because of its inherent potentially descriptive or generic character. As reflected in [WIPO Overview 3.1](#), section 2.10.1, panels have recognized that domain names composed of dictionary words or phrases may support a respondent's rights or legitimate interests where they are used, or demonstrably intended to be used, in connection with their dictionary meaning and not to trade off third-party trademark rights. See also [WIPO Overview 3.1](#), section 3.1.1. In the present case, there is no indication or evidence that the Respondent targeted the Complainant or sought to capitalize on the reputation of its mark.

Accordingly, the Panel finds the second element of the Policy has not been established.

C. Registered and Used in Bad Faith

The evidence in the case file as presented does not indicate that the Respondent's aim in registering the disputed domain name was to profit from or exploit the Complainant's trademark.

Having reviewed the case file, the Panel concludes that while the Complainant's trademark registrations predate the acquisition of the disputed domain name, the Complainant's predecessor in title was required to disclaim "Paycard". A "paycard" can be defined as a prepaid card that employers offer to employees as means to receive wages, compensation or employment-related benefits.¹

As such, "paycard" differs from "rapid pay" which carries a different concept and describes a different function, namely the fast payment of something. The Complainant's rights in RAPID! and RAPID! PAYCARD do not automatically grant the Complainant exclusive rights in "rapid pay" which, as the Respondent appropriately indicated, is widely used by multiple companies in relation to instant or fast payments.

The Panel also notes that the disputed domain name is being offered for sale, but this is not sufficient on its own, considering the circumstances of this case, to conclude that the Complainant has satisfied its burden of proving registration and use in bad faith.

The Panel finds that the Respondent did not register the disputed domain name in bad faith targeting the Complainant or its trademark rights because the Complainant did not prove that the Respondent registered the disputed domain name due to its significance in relation to the Complainant or any trademark of the Complainant. Furthermore, the Complainant did not prove that its marks were notorious or well-known at the time that the Respondent registered the disputed domain name, nor did it assert or provide any evidence of any use of "rapid pay" at that time. [WIPO Overview 3.1](#), section 3.8.1. The Complainant also did not provide any evidence showing that the Respondent was targeting the Complainant with the disputed domain name at any point in time. On the contrary, the Panel finds more likely than not that the Respondent registered the disputed domain name due to its value as a descriptive domain name.

The Panel finds the third element of the Policy has not been established.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.1](#), section 4.16.

The Respondent requests a finding of RDNH, contending, in particular, that the Complainant, represented by specialized counsel, should have known that it could not prevail because the disputed domain name was acquired in 2015, whereas the Complainant only began using the expression "Rapid! Pay" in connection with its mobile application in 2020, and because the disputed domain name consists of descriptive terms.

¹ In the United States, Regulation E, 12 C.F.R. § 1005.2(b)(3)(i)(A), defines a "payroll card account" as an account "directly or indirectly established through an employer" to which electronic fund transfers of wages, salary, or other employee compensation are made on a recurring basis, regardless of whether it is operated by the employer, payroll processor, bank, or another person (<https://www.ecfr.gov/current/title-12/chapter-X/part-1005/subpart-A/section-1005.2>". Visited on May 10, 2026). Visa and Mastercard offer reloadable prepaid cards and indicate that they are alternatives to paper checks; and means for employers to distribute wages to employees as well as an alternative to issuing payroll checks, giving employees access to payroll funds on payday and purchasing capability up to the account balance. (<https://usa.visa.com/dam/VCOM/regional/na/us/pay-with-visa/documents/visa-payroll-card-product-profile.pdf>" and https://www.mastercard.com/pr/business/en/corporate/employee/payroll_card.html". Visited on May 10, 2026).

The Panel has carefully considered the Respondent's request. As set out above, the Panel concludes that the Complainant has failed to establish that the Respondent acquired the disputed domain name in order to target the Complainant or its trademark rights. The Panel also finds it more likely than not that the Respondent acquired the disputed domain name because of its descriptive or brandable value.

Nevertheless, the majority of the Panel does not consider that the present record warrants a finding of RDNH. The Complainant has demonstrated rights in the RAPID! and RAPID! PAYCARD trademarks which predate the Respondent's acquisition of the disputed domain name, and the disputed domain name contains the term "rapid" together with the payments-related term "pay". Although these circumstances are insufficient, in the present case, to establish that the Respondent targeted the Complainant or its trademarks, they provided a basis for the Complainant to submit its claim for determination under the Policy.

The majority of the Panel also notes that the Complainant relied on the offer for sale of the disputed domain name and asserted that it had sent a cease-and-desist letter and subsequent reminders without receiving a reply. The Respondent disputes having received those communications. While these circumstances do not alter the Panel's conclusion on the merits, the majority of the Panel is not persuaded that the Complaint was filed in bad faith or primarily to harass the Respondent.

Accordingly, the majority of the Panel declines to make a finding of Reverse Domain Name Hijacking. Mr. Levine would have found RDNH.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Wilson Pinheiro Jabur/
Wilson Pinheiro Jabur
Presiding Panelist

/Harini Narayanswamy/
Harini Narayanswamy
Panelist

/Gerald M. Levine/
Gerald M. Levine
Panelist
Date: May 26, 2026