

ADMINISTRATIVE PANEL DECISION

Bread Financial Payments, Inc. v. Shi Lei
Case No. D2026-1452

1. The Parties

The Complainant is Bread Financial Payments, Inc., United States of America, represented by Porter Wright Morris & Arthur, LLP, United States of America.

The Respondent is Shi Lei, China.

2. The Domain Name and Registrar

The disputed domain name <breadfinacialbank.com> is registered with Cosmotown, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 4, 2026. On April 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 10, 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 (Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 13, 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 April 15, 2026.

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 April 17, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 7, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 9, 2026.

The Center appointed Manuel Moreno-Torres as the sole panelist in this matter on May 14, 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 tech-forward financial services company wholly owned subsidiary of Bread Financial Holdings, Inc., a publicly traded financial services company founded in 1996.

The Complainant holds a portfolio of trademarks for BREAD FINANCIAL and other marks where the term “bread” is used alongside financial terms such as BREAD PAY or BREAD CAHSBACK. By way of example for BREAD FINANCIAL, see registrations before the United States Patent and Trademark Office: registration number 7300264, registered on February 6, 2024 or, registration number 7305646, registered on February 13, 2024.

The Complainant has spent over USD 150 million on marketing its portfolio of trademarks where most of which were for marketing utilizing the registered mark BREAD FINANCIAL. The mark has achieved important recognition and thus, is to be considered well-known for UDRP purposes in its field of activities.

The Complainant uses <breadfinancial.com> to host a primary official site for most aspects of its business and is the owner of <breadfinancialbank.com>, <breadfinancialbank.org>, and <breadfinancialbank.net> all registered on March 5, 2026.

The disputed domain name was registered on March 6, 2026 and resolves to a pay-per-click (“PPC”) page including links all related to the Complainant’s primarily business. Indeed, by clicking in this related links, the Panel has been redirected to a website at “www.investor.org”, which provides financial planning content as well as articles on wealth management, and investment calculators.

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 the disputed domain name is an intentional misspelling of Complainant’s BREAD FINANCIAL trademark only erasing the letter “n” and adding the word “bank”.

The Complainant has not licensed or authorized the Respondent to use BREAD FINANCIAL mark or, any marks confusingly similar thereto, for any purpose, including as a domain name.

The Complainant also alleges that the disputed domain name resolves to a website displaying PPC links seeking to capitalize directly on the Complainant’s trademarks. Therefore, and according to previous panels decisions, such use cannot confer any rights or legitimate interests on the Respondent.

Regarding the third requirement, the Complainant supports a finding of bad faith because the Respondent was aware of the Complainant’s well-known BREAD FINANCIAL trademark. By adding the word “bank” to a blatant misspelling of its trademarks, the Respondent shows his prior knowledge of the Complainant and its trademarks.

The Complainant also contends that Respondent uses the disputed domain name to resolve to a pay-per-click website in an attempt to “attract, for commercial gain, Internet users to its website, by creating a likelihood of confusion with the Complainant’s mark”. Such use is evidence that the disputed domain name was registered and is being used in bad faith.

Finally, the Complainant supports a finding of bad faith since the configuration of MX records presents the potential for an email phishing scheme impersonating the Complainant, which is tantamount to bad faith.

B. Respondent

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

6. Discussion and Findings

Under paragraph 4(a) of the Policy, to succeed the Complainant must satisfy the Panel that:

- (i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondents have no rights or legitimate interests in respect of the disputed domain names; and
- (iii) the disputed domain names were registered and are being used in bad faith.

There are no exceptional circumstances within paragraph 5(f) of the Rules to prevent the Panel from determining the dispute based upon the Complaint, notwithstanding the failure of the Respondents to file a Response. Under paragraph 14(a) of the Rules in the event of such a “default” the Panel is still required “to proceed with a decision on the complaint”, whilst under paragraph 14(b) it “shall draw such inferences therefrom as it considers appropriate”. This dispute resolution procedure is accepted by the domain name registrant as a condition of registration.

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 and section 1.9 lead the Panel to recognize an obvious misspelling by a relatively straightforward comparison between the Complainant’s trademark and the disputed domain name.

Although the addition of other term here, “bank”, 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 3.1](#), 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 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 notes that none of the circumstances described in paragraph 4(c) of the Policy can be inferred from the case file.

As set out in the [WIPO Overview 3.1](#), section 2.9: “Applying UDRP paragraph 4(c), panels have found that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant’s mark or otherwise mislead Internet users.” Here, these remarks match with the circumstances of the case and therefore, the Panel finds no right or legitimate interest in favor of the Respondent.

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 Panel notes that the Respondent intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the complainant’s mark as set out in paragraph 4(b)(iv) of the Policy. As noted, the disputed domain name has been used to point to a parking page displaying commercial links related to the services provided by the Complainant and purportedly generating click-through-revenues for the Respondent which all together support a finding of bad faith use and registration.

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.

On balance, the Respondent knew about the Complainant and its trademarks when registering the disputed domain name <breadfinacialbank.com> due to the Complainant’s reputation in the financial business. Besides, the Respondent’s parking page shows links in connection with the Complainant’s business as a means to take advantage of the goodwill and attractiveness of the BREAD FINANCIAL trademark even though there is no affiliation between the parties. Thus, the Respondent targeted the Complainant and its trademarks, and the registration was 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 name <breadfinacialbank.com> be transferred to the Complainant.

/Manuel Moreno-Torres/

Manuel Moreno-Torres

Sole Panelist

Date: May 20, 2026