

ADMINISTRATIVE PANEL DECISION

Keller Daniel v. ali imran and Peter Temex
Case No. D2026-1570

1. The Parties

The Complainant is Keller Daniel, Germany, self-represented.

The Respondents are ali imran, Pakistan (“First Respondent”), self-represented, and Peter Temex, United States of America (“United States”) (“Second Respondent”); (jointly the “Respondents”).

2. The Domain Names and Registrars

The disputed domain name <ezzocard.com> is registered with GoDaddy.com, LLC. The disputed domain name <ezzocard.online> is registered with Nicenic International Group Co., Limited.

GoDaddy.com, LLC and Nicenic International Group Co., Limited are separately and jointly referred to below as the “Registrar”, unless otherwise noted.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 14, 2026. On the same day, the Center transmitted by email to the Registrar requests for registrar verification in connection with the disputed domain names. On the same day, the Registrar transmitted by email to the Center its verification responses disclosing registrant and contact information for the disputed domain names that differed from the named Respondent (Unknown, Privacy service listed in WhoIs) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 15, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. 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 Respondents 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. A Response was filed with the Center by the First Respondent with respect to the disputed domain name <ezzocard.online> on April 19, 2026.

On May 6, 2026, the Complainant made an unsolicited supplemental filing.

The Center appointed Matthew Kennedy as the sole panelist in this matter on May 15, 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 disputed domain name <ezzocard.com> was registered on April 22, 2016. It is held by the Second Respondent and currently resolves to a parking page hosted by the Registrar that includes a button labelled "Get This Domain". At the time when the Complaint was filed, the parking page provided information on gift cards whereas at time of this Decision, it provides information on credit card reviews.

The disputed domain name <ezzocard.online> was registered on March 7, 2022. It is held by the First Respondent and resolves to a website in English offering for sale virtual prepaid cards for online payments. The homepage prominently displays an Ezzocard logo in white on a black background with a gold crescent. Since the commencement of this dispute, the homepage has been updated to display the following disclaimers: "Ezzocard is used as a business name by the Respondent since 2022 and is not related to any other entity" and, in a footnote in small type: "This website is an independent service and is not affiliated with any other entity using the name 'Ezzocard'." This Respondent registered a company named WWW.EZZOCARD.ONLINE LIMITED in England and Wales on June 17, 2022, which was dissolved on December 17, 2024. He registered another company with the same name in the same jurisdiction on January 2, 2025.¹

The Complainant registered a company named Ezzocard Inc. in California, United States, on November 10, 2025. That company has a Californian subsidiary named WWW.EZZOCARD.FINANCE LLC that appears to operate a website associated with the domain name <ezzocard.finance>, which offers for sale virtual prepaid cards for anonymous online payments and verification. The homepage prominently displays an "e ezzocard" and crescent logo in gold and white on a black background. Ezzocard, Inc. obtained Californian trademark registration number 02051640 for EZZOCARD on December 14, 2025, with a claim of first use on November 11, 2025. This registration disclaims exclusive use of the word "card". Ezzocard, Inc. also filed United States trademark application serial number 99557840 for EZZOCARD on December 19, 2025. That application is currently pending. The Complainant obtained European Union Trade Mark registration number 019287096 for EZZOCARD, registered on March 21, 2026 (application filed on December 5, 2025), specifying the provision of prepaid cards and vouchers; issuance of prepaid gift cards; processing electronic payments made through prepaid cards; issuance of prepaid vouchers; credit and cash card services; credit cards services in class 36.

¹ These companies were registered by a person with a name that matches the sender name on emails sent by the First Respondent. The Panel notes its general powers articulated inter alia in paragraphs 10 and 12 of the Rules and has searched the United Kingdom Companies House register (www.gov.uk), which is a matter of public record, to verify the information provided by the Parties regarding the Respondent's relationship with those companies. The Panel considers this limited research useful in assessing the case merits and reaching a decision. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.8.

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.

Notably, the Complainant contends that the disputed domain names are identical to its EZZOCARD mark.

The Respondents have no rights or legitimate interests in respect of the disputed domain names. The Respondents are not affiliated with the Complainant in any way and have not been authorized, licensed, or otherwise permitted to use the EZZOCARD trademark. There is no evidence that the Respondent has been commonly known by the disputed domain names. The disputed domain name <ezzocard.com> is passively held. The disputed domain name <ezzocard.online> is used in a manner that imitates or suggests association with the Complainant's brand, without authorization.

The disputed domain names have been registered and are being used in bad faith. The Respondents registered the disputed domain names with knowledge of the Complainant's trademark rights in EZZOCARD.

The EZZOCARD mark is distinctive and not a generic or descriptive term, making it highly unlikely that the Respondents registered the disputed domain names without awareness of the Complainant's rights. The disputed domain name <ezzocard.com> is passively held; passive holding of a domain name identical to a distinctive trademark constitutes bad faith use. The disputed domain name <ezzocard.online> is used in a manner that creates a likelihood of confusion with the Complainant's mark, by imitating or suggesting association with the Complainant's services. Although the disputed domain names may have been registered prior to the Complainant's trademark registration, their current use clearly targets the Complainant's trademark. The Complainant operates internationally through corporate entities in the United States, further demonstrating the established presence and reputation of the EZZOCARD brand. The Complainant has been using the EZZOCARD mark in commerce prior to the Respondents' use of the disputed domain names, and the Respondents' current use clearly targets the Complainant's established brand.

In his supplemental filing, the Complainant submits that the relevant comparison is not between the Parties' respective domain names but rather between each domain name and the Complainant's trademark rights. A company registration alone does not establish trademark rights or legitimate interests under the Policy. The First Respondent's first company has been dissolved and the other is subject to strike-off action. The First Respondent offers virtual prepaid cards, which is the same category of services as those that the Complainant offers, under the identical name "Ezzocard". This creates a clear likelihood of confusion and is not a bona fide offering of goods or services. The disclaimer on the First Respondent's website does not cure confusing similarity because the disputed domain name <ezzocard.online> is identical to the Complainant's mark. Even if the disputed domain name <ezzocard.online> was registered earlier, there is no evidence of any bona fide or active use prior to the Complainant's emergence. The Respondent's current use of the disputed domain name <ezzocard.online> creates a clear likelihood of confusion and indicates that the disputed domain name <ezzocard.online> is being used to target the Complainant's mark. Such conduct constitutes bad faith use under the Policy. This is particularly evident given the First Respondent's own acknowledgment of potential confusion.

B. Respondents

The First Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name <ezzocard.online>.

Notably, he contends that the disputed domain name <ezzocard.online> was registered on March 7, 2022, which is significantly earlier than the Complainant's domain name <ezzocard.finance>. He has been operating a legitimate business under the name "Ezzocard" since 2022 and established rights and legitimate use of the name "Ezzocard" well before the Complainant.

The disputed domain name <ezzocard.online> was registered in good faith, without any knowledge of the Complainant or its alleged trademark at the time of registration. Given that the disputed domain name <ezzocard.online> and business existed several years before the Complainant's domain name, it is not possible that he registered the disputed domain name <ezzocard.online> with the intention of targeting the Complainant.

The First Respondent operates an independent online service offering virtual prepaid cards. To avoid any possible confusion, he has clearly displayed a disclaimer on his website. Certain visual elements of the website have been updated to further distinguish his service. Any similarity in website layout or design is due to common industry templates used in e-commerce platforms and not due to any intention to copy or imitate the Complainant. The First Respondent has never attempted to mislead users or create confusion regarding affiliation.

The First Respondent denies any connection to the disputed domain name <ezzocard.com>.

The Second Respondent did not reply to the Complainant's contentions regarding the disputed domain name <ezzocard.com>.

6. Discussion and Findings

6.1. Preliminary Issues

A. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple domain name registrants pursuant to paragraph 10(e) of the Rules.

The Complainant respectfully submits that, despite the use of different registrant names, the disputed domain names are under common control and form part of a single coordinated abusive scheme targeting the Complainant's EZZOCARD trademark. Its main arguments are that the combination of (i) identical targeting of the Complainant's mark, (ii) active impersonation through one of the disputed domain names, and (iii) passive holding of the other disputed domain name, demonstrates that the disputed domain names are part of a unified strategy designed to exploit the Complainant's brand.

The First Respondent stated that the disputed domain name <ezzocard.com> is not owned, controlled, or operated by him. This disputed domain name was registered in 2016, which predates the registration of his business and the disputed domain name <ezzocard.online> in 2022. He states that he has no affiliation with the disputed domain name <ezzocard.com> and has never claimed ownership of it. That disputed domain name is currently inactive and does not resolve to any website.

The Second Respondent did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. Procedural efficiency also underpins the Panel's consideration of such a consolidation scenario. See [WIPO Overview 3.1](#), section 4.11.2.

As regards common control, the Panel notes that the disputed domain names are identical to each other and to the Complainant's trademark, differing only in their respective generic Top-Level Domains ("gTLDs"). However, the disputed domain names were registered years apart in different registrant names with different

contact information, they are hosted on different nameservers and used in different ways. No evidence was presented regarding any prior active use of the disputed domain name <ezzocard.com>. Based on this record, the Panel has insufficient reason to find that the disputed domain names (or the lone associated website) are under common control. Moreover, the Complainant's website prominently displays a notice that the disputed domain name <ezzocard.online> is fake but that the disputed domain name <ezzocard.com> is now <ezzocard.finance> (i.e., his own domain name). This tends to confirm that the disputes regarding the domain names <ezzocard.online> and <ezzocard.com> are not under common control.²

Accordingly, the Panel will decide the complaint regarding the disputed domain name <ezzocard.online> (referred to below as the "disputed domain name") registered in the name of the First Respondent (referred to below as the "Respondent"). On the other hand, the Panel declines to consolidate the dispute regarding the disputed domain name <ezzocard.com>. This decision is made without prejudice to the possibility of refiling a complaint regarding the disputed domain name <ezzocard.com>, subject to the Panel's observations in Section 6.2D below.

B. Unsolicited Supplemental Filing

The Complainant made an unsolicited supplemental filing one day after the filing of the Response but prior to the due date for Response. The Respondent did not comment on this supplemental filing.

Paragraph 10(d) of the Rules provides that "[t]he Panel shall determine the admissibility, relevance, materiality and weight of the evidence". Although paragraph 12 of the Rules empowers the Panel, in its sole discretion, to request further statements or documents from either of the Parties, this does not preclude the Panel from accepting unsolicited filings. See *Delikomat Betriebsverpflegung Gesellschaft m.b.H. v. Alexander Lehner*, WIPO Case No. [D2001-1447](#).

The Complainant makes its supplemental filing to reply to the Response. The Panel notes that the Response contains information about companies incorporated by the Respondent that the Complainant could not reasonably have anticipated at the time of filing the Complaint. The Respondent has not objected to admission of the Complainant's supplemental filing, which is relatively brief and was made before the appointment of the Panel, such that acceptance of it will not unduly delay this proceeding. Moreover, given the Panel's findings in Section 6.2C below, the Respondent will not be prejudiced if it is not given an opportunity to comment on the Complainant's supplemental filing.

Therefore, the Panel exercises its discretion to admit the Complainant's supplemental filing and will take it into consideration in this decision according to its relevance, materiality and weight.

6.2. Substantive Issues

Paragraph 4(a) of the Policy provides that a complainant must prove each of the following elements with respect to the disputed domain name:

- (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.

The burden of proof of each element is borne by the Complainant.

² Further to footnote 1 *supra*, the Panel again notes its general powers and has visited the Complainant's website to verify information provided by the Complainant regarding that website, as this limited research is useful in assessing the request for consolidation.

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. See [WIPO Overview 3.1](#), section 1.7.

The Complainant has shown registered rights in the European Union in respect of an EZZOCARD trademark for the purposes of the Policy. It is unnecessary for the Panel to consider the Complainant's trademark registration granted by the State of California, which would have been subject to a more limited examination than a federal United States trademark registration. See [WIPO Overview 3.1](#), sections 1.2.1 and 1.2.2. The Complainant's United States pending trademark application does not by itself establish trademark rights within the meaning of UDRP paragraph 4(a)(i). See [WIPO Overview 3.1](#), section 1.1.4.

The Panel finds the EZZOCARD mark is recognizable within the disputed domain name. The only additional element in the disputed domain name is a generic Top-Level Domain (".online") which, as a standard requirement of domain name registration, may be disregarded in the assessment of identity for the purposes of the first element of the Policy. Accordingly, the Panel finds that the disputed domain name is identical to the Complainant's mark for the purposes of the Policy.

Therefore, the Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Given the Panel's findings regarding the third element of paragraph 4(a) of the Policy, it is unnecessary to consider the second element.

C. Registered and Used in Bad Faith

The Panel notes that the third element of paragraph 4(a) of the Policy contains two requirements that apply conjunctively. A complainant must show both that the disputed domain name has been registered in bad faith and also that it is being used in bad faith. The former requires a demonstration that the Respondent knew, or should have known of the Complainant and/or the Complainant's trademark at the time when it registered or acquired the disputed domain name and that it registered the disputed domain name with a bad faith intention targeting the Complainant and/or its mark.

In the present case, the disputed domain name was registered in 2022, four years before the registration of the Complainant's trademark. The Panel recalls that where a respondent registers a domain name before a complainant's trademark rights accrue, panels will not normally find bad faith on the part of the respondent. See [WIPO Overview 3.1](#), section 3.8.1.

The Panel sees no exceptional circumstances that might establish that the Respondent's intent in registering the disputed domain name was to unfairly capitalize on the Complainant's nascent, as yet unregistered, trademark rights. See [WIPO Overview 3.1](#), section 3.8.2. The disputed domain name was registered over three years before an application was filed to register the Complainant's trademark, and over three years before the incorporation of the corporate entities through which the Complainant operates, i.e., Ezzocard Inc. and WWW.EZZOCARD.FINANCE LLC. Although the Complainant asserts that he was using the EZZOCARD mark in commerce prior to the Respondent's use of the disputed domain name, he provides no evidence in support of that assertion. On the contrary, Ezzocard Inc's Californian trademark registration includes a claim of first use of the mark anywhere on November 11, 2025, which was over three years after the registration of the disputed domain name.³

While the Panel appreciates that there are striking similarities between the Parties' respective websites, it is unclear from the record which Party was first to use the "e ezzocard" logo and the website layout. In any

³ It is unnecessary to consider the Respondent's company name registrations as the earlier one was contemporaneous with the registration of the disputed domain name <ezzocard.online>.

case, the possibility that the disputed domain name is being used in bad faith in 2026 cannot overcome the failure to establish that the disputed domain name was registered in bad faith in 2022. Accordingly, the Panel finds that the Respondent did not register the disputed domain name in bad faith targeting of the Complainant or its trademark rights because the Complainant had no trademark rights at the time when the Respondent registered the disputed domain name. See [WIPO Overview 3.1](#), section 3.8.

Therefore, 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 (“RDNH”) 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 RDNH. See [WIPO Overview 3.1](#), section 4.16.

The Panel notes that the lack of success of the Complaint in this case is not due to the failure to obtain consolidation of the dispute regarding the disputed domain name <ezzocard.com>. The Complainant is well aware that the disputed domain names were registered prior to his trademark registration but he appears to have misunderstood that this issue cannot be addressed by claiming that the current use of the disputed domain names targets his trademark. In this regard, it is notable that the Complainant lacks legal representation.

Therefore, the Panel does not find that the Complaint in this dispute has been brought in bad faith or that it constitutes an attempt at RDNH. However, should the Complainant consider refiling a complaint regarding the domain name <ezzocard.com>, he is now fully on notice of the challenges of bringing disputes regarding domain names registered before trademark rights arise under the Policy.

7. Decision

For the foregoing reasons, the Complaint is denied, without prejudice to the possibility of refiling a complaint regarding the disputed domain name <ezzocard.com>.

/Matthew Kennedy/

Matthew Kennedy

Sole Panelist

Date: May 21, 2026