

ADMINISTRATIVE PANEL DECISION

Concora Credit Inc. v. Camela Andrew, Out Reach, John Wick, Sunil Gupta,
host cob

Case No. D2026-1785

1. The Parties

The Complainant is Concora Credit Inc., United States of America ("U.S."), represented by Stoel Rives, LLP, United States of America.

The Respondents are Camela Andrew, Bangladesh, Out Reach, India, John Wick, United States of America, and Sunil Gupta, host cob, India.

2. The Domain Names and Registrar

The disputed domain names <mydestiny-card.com>, <myindigocard.online>, <mymilestonecard.cloud>, <mymilestonecard.com.co>, <mymilestonecard.onl>, <mymilestone-card.online>, <mymilestonecard.site>, <mymilestoneecard.com> are registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 28, 2026. On April 28, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On April 29, 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 (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint.

The Center sent an email communication to the Complainant on April 29, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) 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 amended Complaint on May 19, 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 Respondents of the Complaint, and the proceedings commenced on May 20, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 9, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on June 12, 2026.

The Center appointed Tobias Malte Müller as the sole panelist in this matter on June 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’s undisputed statements confirm that it provides consumer credit and credit card services throughout the United States of America under the trademarks MILESTONE, DESTINY, and INDIGO.

Furthermore, the evidence before the Panel proves that the Complainant is the registered owner of a trademark portfolio which includes the following trademark registrations:

- MILESTONE - U.S. trademark Reg. No. 6168920, registered on October 6, 2020 for goods in class 9
- INDIGO - U.S. trademark Reg. No. 3779456, registered on April 20, 2010 for goods in class 9
- DESTINY - U.S. trademark Reg. No. 6394460, registered on June 22, 2021 for goods in class 9

The eight disputed domain names have been registered by four different registrants as follows:

- <mydestiny-card.com> registered by Camela Andrew on March 23, 2024
- <myindigocard.online> registered by Sunil Gupta, host cob, on May 13, 2025
- <mymilestonecard.cloud> registered by Out Reach on February 25, 2025
- <mymilestone-card.online> registered by Out Reach on February 25, 2025
- <mymilestonecard.site> registered by Out Reach on February 25, 2025
- <mymilestonecard.onl> registered by John Wick on June 6, 2025
- <mymilestonecard.com.co> registered by John Wick on June 9, 2025
- <mymilestoneecard.com> registered by John Wick on June 9, 2025

The Registrar is the same for all eight disputed domain names.

The disputed domain names resolve to English-language websites pretending to provide information to consumers seeking to access the Complainant’s credit card services. The sites instruct users on how to log in, activate a card, make a payment, or register an account, in relation to a website associated with the Complainant’s products. Even though most of these websites include a “Disclaimer” following which that website it is not affiliated with, endorsed by, or associated with the Complainant they all include similar aspects of the Complainant’s trademarks, images and website, namely: (i) links to the Complainant’s legitimate LinkedIn, YouTube, and X profiles; (ii) screenshots from the Complainant’s legitimate website; and (iii) the allegation of being managed by “Genesis Financial Solutions” or “Genesis FS Card Services” which was the Complainant’s former name.

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:

- (i) multiple factors support consolidation, including the following: similarities of the naming conventions of the disputed domain names, same language and subject matter on each website despite the registrants allegedly having different geographic locations, and specific targeting of the Complainant's credit card services. The unreliability of the registrant information supports the inference that the disputed domain names are controlled by a single actor or coordinated group using fictitious or placeholder identities, and therefore does not defeat consolidation under the UDRP;
- (ii) the disputed domain names identically include the Complaint's trademarks. The Respondents' websites falsely associate themselves with the Complainant and are likely to cause confusion, mistake, and/or deception among consumers;
- (iii) the Respondents do not own any trademarks or service marks that are reflected in the disputed domain names. The Complainant has never granted the Respondents any rights in its trademarks. The disputed domain names have been registered years after the Complainant began using its trademarks. The Respondents are using the disputed domain names to profit on the Complainant's goodwill and hard-earned reputation and to trick unsuspecting consumers into believing that the Respondents' websites are affiliated with the Complainant and/or the Complainant's trademarks;
- (iv) this is not a case of innocent registration. The Respondents rather knew of the Complainant's rights. Furthermore, the disputed domain names offer credit cards and credit card services using images from the Complainant's websites and using the Complainant's trademarks. But none of these credit cards or related services promoted on the disputed domain names have been authorized in any way by the Complainant. The Respondents' websites falsely associate themselves with the Complainant and are likely to cause confusion, mistake, and/or deception among consumers for the Respondents' own commercial gain.

B. Respondents

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to "decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable". Paragraph 4(a) of the Policy requires a complainant to prove each of the following three elements in order to obtain an order that disputed domain name be transferred or cancelled:

- (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 Panel will therefore proceed to analyze whether the three elements of paragraph 4(a) of the Policy are satisfied. Before doing so, the Panel will address the consolidation.

Consolidation: Multiple Respondents

The amended Complaint was filed in relation to four 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 disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants 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, see WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.11.2.

As set forth in [WIPO Overview 3.1](#), section 4.11.2, "Panels have considered a range of factors, typically present in some combination, as useful to determining whether such consolidation is appropriate, such as similarities in or relevant aspects of (i) the registrants' identity(ies) including pseudonyms, (ii) the registrants' contact information including email address(es), postal address(es), or phone number(s), including any pattern of irregularities, (iii) relevant IP addresses, name servers, or webhost(s), (iv) the content or layout of websites corresponding to the disputed domain names, (v) the nature of the marks at issue (e.g., where a registrant targets a specific sector), (vi) any naming patterns in the disputed domain names (e.g., <mark-country> or <mark-goods>), (vii) the relevant language/scripts of the disputed domain names particularly where they are the same as the mark(s) at issue, (viii) any changes by the respondent relating to any of the above items following communications regarding the disputed domain name(s), (ix) any evidence of respondent affiliation with respect to the ability to control the disputed domain name(s), (x) any (prior) pattern of similar respondent behavior, or (xi) other arguments made by the complainant and/or disclosures by the respondent(s)."

As regards common control, the Panel notes the following factors:

- (i) the disputed domain names are registered with the same Registrar;
- (ii) the registrants' identity(ies) appear to include pseudonyms like "Out Reach" or "John Wick" (following the action thrillers with Keanu Reeves);
- (iii) the disputed domain names were registered in a relatively short time period between March 2024 and June 2025;
- (iv) the disputed domain names identically contain the Complainant's registered trademarks;
- (v) all websites to which the disputed domain names resolve include similar content and layout of the Complainant's trademarks, images and websites, namely: (i) links to the Complainant's legitimate LinkedIn, YouTube, and X profiles; (ii) screenshots from the Complainant's legitimate website and (iii) the allegation of being managed by "Genesis Financial Solutions" or "Genesis FS Card Services" which was the Complainant's former name;
- (vi) the disputed domain names follow the same naming pattern, i.e. "myTRADEMARKcard", "myTRADEMARK-card", and "myTRADEMARKecard".

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. The Respondents have been given the opportunity to comment on the foregoing

and have elected not to file a response or to provide any explanation. In particular, the Respondents failed to come forward with any allegations or evidence to object the consolidation.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as “the Respondent”) in a single proceeding.

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 3.1](#), section 1.7.

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

The Panel finds these marks are recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the marks for the purposes of the Policy, [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms here, “my”, “card”/“-card”, or “ecard”, 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.

Panel notes that all the disputed domain names contain the Complainant’s registered trademarks and additional terms within the trademark owner’s field of commerce or indicating services related to the brand, i.e. <my...card>, <my...-card> or <my...ecard>, which point to the Complainant’s credit card services. Consequently, the Panel holds that the nature of these disputed domain names trigger an inference of affiliation, see [WIPO Overview 3.1](#) at section 2.5.1

It is to be noted that most of these websites, to which the disputed domain names resolve, do indeed include a “Disclaimer” following which that website it is not affiliated with, endorsed by, or associated with the Complainant. However, it results from the undisputed evidence before the Panel, that those websites pretend to provide information to consumers seeking to access the Complainant’s credit card services. The sites instruct users on how to log in, activate a card, make a payment, or register an account, in relation to a website associated with the Complainant’s products. Furthermore, they all include similar aspects of the Complainant’s trademarks, images and website, namely: (i) links to the Complainant’s legitimate LinkedIn, YouTube, and X profiles and (ii) screenshots from the Complainant’s legitimate website.

The Panel notes that even if the disputed domain names were used in relation to genuine informational websites, the Panel finds that the composition of the disputed domain names creates an impermissible risk of user confusion through impersonation. Moreover, the Panel finds it difficult to discern any legitimate reason for the Respondent’s registration of multiple domain names incorporating the Complainant’s trademarks, particularly where those domain names were used to host substantially similar content. The Panel further notes that the disputed domain names were registered using apparently false registrant information. In the Panel’s view, these circumstances, taken cumulatively, weigh against a finding that the Respondent has rights or legitimate interests in the disputed domain names.

In the light of all these circumstances, the Panel concludes that such use cannot be considered fair use under Paragraph 4(c)(iii) of the Policy.

In addition, the Respondent did not submit any evidence of bona fide pre-Complaint preparations to use the disputed domain names in the sense of Paragraph 4(c)(i) of the Policy. As outlined above, the Complainant’s uncontested allegations demonstrate that it has not authorized the Respondent’s use of its trademarks for registering the disputed domain names, which are confusingly similar.

Finally, the Panel notes that there is no evidence in the record that could lead to the conclusion that the Respondent might be commonly known by the disputed domain names pursuant to Paragraph 4(c)(ii) of the Policy.

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 3.1](#), section 3.2.1. One of these circumstances is that the Respondents by using the domain name, have intentionally attempted to attract, for commercial gain, Internet users to their web site or other on-line location, by creating a likelihood of confusion with the complainant’s mark as to the source, sponsorship, affiliation, or endorsement of their web site or location or of a product or service on their web site or location (Paragraph 4(b)(iv) of the Policy).

It is the view of this Panel that these circumstances are met in the case at hand. It results from the Complainant’s undisputed allegations that the disputed domain names resolve to English-language websites pretending to provide information to consumers seeking to access the Complainant’s credit card services and containing (i) links to the Complainant’s legitimate LinkedIn, YouTube, and X profiles and (ii) screenshots from the Complainant’s legitimate website. Consequently, and in the absence of any evidence to the contrary, the Panel is convinced that the Respondent also knew that the disputed domain names included the Complainant’s marks when they registered said domain names. The Respondent must have been aware that the disputed domain names themselves would confuse Internet users and would suggest to them that the Respondents’ websites were in some way connected to the Complainant, if not actually

provided by the Complainant itself. Registration of a domain name which contains a third party's mark, in awareness of said mark, to take advantage of its similarities with the mentioned mark, and in the absence of rights or legitimate interests amounts to registration in bad faith.

The finding of bad faith registration and use is supported by the further circumstances resulting from the case at hand which are:

- (i) the Respondent's failure to submit a response to the Complaint;
- (ii) the Respondent's failure to provide any evidence of actual or contemplated good faith use;
- (iii) the nature of the domain names systematically including three of the Complainant's trademarks identically and combining them with additional terms within the trademark owner's field of commerce;
- (iv) the Respondent's identities appearing to include pseudonyms like "Out Reach" or "John Wick" (following the action thrillers with Keanu Reeves);

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 <mydestiny-card.com>, <myindigocard.online>, <mymilestonecard.cloud>, <mymilestonecard.com.co>, <mymilestonecard.onl>, <mymilestone-card.online>, <mymilestonecard.site>, <mymilestonecard.com> be transferred to the Complainant.

/Tobias Malte Müller/

Tobias Malte Müller

Sole Panelist

Date: July 2, 2026