

ADMINISTRATIVE PANEL DECISION

Illia Pustovit, Limited Liability Company SSSTIK (LLC SSSTIK) v. Bravo Brian, Bravo

Case No. D2026-1840

1. The Parties

The Complainants are Illia Pustovit, Ukraine and Limited Liability Company SSSTIK (LLC SSSTIK), Ukraine, internally represented.

The Respondent is Bravo Brian, Bravo, Pakistan, self-represented.

2. The Domain Name and Registrar

The disputed domain name <sssstiktok.tools> is registered with Hosting Concepts B.V. d/b/a Registrar.eu. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 29, 2026. On April 30, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 1, 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 (Whois Privacy Protection Foundation) and contact information in the Complaint. The Center sent an email communication to the Complainants on May 4, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainants to submit an amendment to the Complaint. The Complainants filed an amendment to the Complaint on May 4, 2026.

The Center verified that the Complaint [together with the amendment to the Complaint/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 May 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 27, 2026. The Respondent sent an email communication to the Center on May 23, 2026. Accordingly, the Center notified the Parties about the commencement of panel appointment process on May 28, 2026.

The Center appointed John Swinson as the sole panelist in this matter on June 4, 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.

On June 23, 2026, pursuant to paragraphs 10 and 12 of the Rules, the Panel issued a Procedural Order noting that the disputed domain name includes a third-party trademark. The Panel gave the Complainant the opportunity to submit evidence that the relevant third-party right holder of the mark TIKTOK has consented the Complainant to file the case, and that any transfer order be issued in favor of the Complainant only. On June 29, 2026, the Complainant submitted a response to the Procedural Order. The Respondent did not file a response thereto.

4. Factual Background

The first Complainant is a Ukrainian individual and the second Complainant is his related company which carries on a business of providing computer software to download videos from TikTok under the name “SSSTIK”. The Panel will refer to both Complainants as “the Complainant” unless the context requires otherwise.

The Complainant operates the website at the domain name <ssstik.io>, registered on November 20, 2020, where it offers free TikTok video download services. The Complainant also registered the domain name <ssstik.fun> on or about March 23, 2022. This domain name resolves to a website from which the Complainant’s app may be downloaded.

The Complainant owns United States of America (“United States”) Registered Trademark No 7,084,349. The trademark is a figurative mark comprised of SSSTIK and a device of an arrow pointing vertically down from a horizontal bar. The application to register the trademark was filed on April 22, 2022, and claims a first use in commerce of June 10, 2020. The trademark was registered on June 20, 2023.

The disputed domain name was registered on September 29, 2025.

The website at the disputed domain name has the title “Ssstiktok - Download TikTok Clips Free-and-Clear, No Watermark”. The website description in the metatags for the website at the disputed domain name states: “Download TikTok videos without watermark using SSSTikTok. Fast, free, and easy tool for Android, iPhone, and PC. No app required, high-quality downloads.” The website has the same purple download arrow logo as used on the Complainant’s website and that is part of the Complainant’s United States registered trademark. This website appears to provide software products or services that compete with the Complainant’s software products and services.

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.

In summary, the Complainant makes the following submissions.

The Complainant owns registered trademark rights for a figurative mark consisting of the word element “SSSTIK” in combination with a downward-facing stylized arrow-shaped device placed to the left of the word element, with the device appearing on a dark square background.

The term “ssstik” has become closely associated with the Complainant as a source identifier for a free TikTok video downloading tool that enables users to download TikTok videos in high quality MP4 file format and HD resolution.

By the time of registration of the disputed domain name, the Complainant's SSSTIK brand was widely used and recognized in connection with TikTok video downloading services. The Complainant's official website was active and ranking in search results from 2020, and the SSSTIK mark had acquired distinctiveness in the relevant market.

The textual component of the disputed domain name consists of the Complainant's trademark SSSTIK in its entirety.

The possible presence of the TIKTOK mark within the disputed domain name does not eliminate confusing similarity, but rather reinforces the misleading impression of an association with the Complainant and its SSSTIK trademark.

Given that the Complainant's trademark is distinctive and not generic terms, there is no plausible reason for the Respondent to have legitimately adopted the disputed domain name.

The Respondent is not making any bona fide offering of goods or services under the disputed domain name. On the contrary, the Respondent's use of the disputed domain name is plainly aimed at exploiting the Complainant's trademark SSSTIK for misleading purposes. The very choice of the ".tools" generic Top-Level Domain exacerbates the deception, as it implies a tool, which aligns with the Complainant's TikTok download tools, thereby misleading users into believing the site is operated by or affiliated with the Complainant.

Therefore, given the distinctive and unique nature of the Complainant's mark, and the fact that the Complainant's trademark rights were established well before the disputed domain name's registration, it is evident that the Respondent knew of the Complainant's mark and targeted it.

B. Respondent

The Respondent did not file a formal reply to the Complainant's contentions.

The Respondent sent an email to the Center on May 23, 2026, that states, in part, the following:

"... The [disputed domain name] has not been operated with malicious intent, phishing activity, or any attempt to defraud users. We also believe that certain complaints against our platform are being influenced by competitors and overbroad trademark claims.

We are currently reviewing the Complaint with our legal advisors and preparing our formal Response within the allowed timeframe [...].

Additionally, we remain open to reasonable discussion or settlement options, provided they are fair and mutually acceptable."

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements enumerated in paragraph 4(a) of the Policy have been satisfied, namely:

- (i) the disputed domain name is identical or confusingly similar to a 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.

The onus of proving these elements is on the Complainant.

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 entirety of the mark mark is reproduced within the disputed domain name. [WIPO Overview 3.1](#), section 1.8. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms (here, the letter "s" and the term "tok") 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.

The Panel has reviewed the Respondent's website to determine if paragraph 4(c)(i) of the Policy applies in the present case. The Panel determines that it does not.

The Respondent is using the disputed domain name for a website that provides a product or service that competes with the Complainant's products and services. Paragraph 4(c)(i) of the Policy only applies where the Respondent has bona fide use of the disputed name. This analysis involves whether the evidence demonstrates that the Respondent was likely aware of (or should have been aware of) the Complainant and its SSSTIK trademark when registering the disputed domain name. After reviewing the available record, and for reasons that will be explained in more detail under the third element, the Panel finds that the Respondent cannot demonstrate that paragraph 4(c)(i) of the Policy applies in respect of the disputed domain name. See *Demand Media, Inc. v. Global Publications Ltd*, WIPO Case No. [D2007-1677](#); *Avanquest pdfforge GmbH v. Deeptech Industries Limited*, Samantha WIESE, WIPO Case No. [D2024-1481](#); and *Illia Pustovit, Limited Liability Company Ssstik (LLC Ssstik) v. Gabriel Duby, 43Web Media Inc*, WIPO Case No. [D2024-2082](#).

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 finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Generally speaking, a finding that a domain name has been registered and is being used in bad faith requires an inference to be drawn that the respondent in question has registered and is using the disputed domain name to take advantage of its significance as a trademark owned by (usually) the complainant.

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 Panel considers that the disputed domain name was selected by the Respondent because of the Complainant's trademark. The Respondent's website includes the same arrow logo as appearing on the Complainant's website and as part of the Complainant's registered trademark. The Respondent does not assert that he was unaware of the Complainant's trademark or product when he registered the disputed domain name. The Panel concludes that it is highly likely that the Respondent registered the disputed domain name knowing of the Complainant's product and because of the reputation of the Complainant's SSSTIK mark.

Accordingly, on the record in this case, the Panel finds that the disputed domain name was registered to capitalize on the Complainant's trademark. Further, the Respondent uses the disputed domain name in connection with a service which appears to overlap directly with the Complainant's registered rights for a similar product or service. These factors demonstrate bad faith registration and use.

In conclusion, the Panel considers that the Respondent registered the disputed domain name targeting a Complainant's mark with the intention to attempt to attract, for commercial gain, internet users to the Respondent's website by creating a likelihood of confusion with the Complainant's mark. These circumstances support a finding of bad faith under paragraph 4(b)(iv) of the Policy.

The Panel finds that the Complainant has established the third element of the Policy.

D. Appropriate Remedy

The Panel notes that the disputed domain name includes a well-known trademark owned by a third-party. The Complainant acknowledged that it has not obtained, and does not possess, evidence of consent from the third-party trademark owner of the TIKTOK mark authorizing the filing of the present Complaint or requesting that any transfer be ordered in favor of the Complainant.

Despite not holding any rights in the TIKTOK mark, the Complainant submits that the Complainant's website under the domain name <ssstik.io> had already achieved substantial recognition and attracted millions of users well before the registration of the disputed domain name, and that this supports the inference that the Respondent targeted the Complainant's well-known SSSTIK service and website, rather than TikTok itself, by copying the Complainant's branding and website. Accordingly, according to the Complainant, the evidence before the Panel contains sufficient evidence to justify the transfer of the disputed domain name to the Complainant.

Prior decisions under the Policy have considered this issue and have found that a complainant is entitled to bring a complaint where the disputed domain name infringes its own trademark rights, even if the disputed domain name also contains or refers to additional third-party trademarks.

Some panels in these circumstances have considered it appropriate to issue a procedural order to seek assurance from the relevant third-party mark owner, or to make any transfer order without prejudice to the concerned third-party's rights (see e.g. *Aldi GmbH & Co. KG, Aldi Stores Limited v. Ronan Barrett*, WIPO Case No. [D2016-2219](#) and *Philip Morris USA Inc. v. Whoisguard Protected, Whoisguard, Inc. / MARK JAYSON DAVID*, WIPO Case No. [D2016-2194](#)). Some panels have also elected to cancel the disputed

domain name (*Incase Designs Corp. v. Juliane Kuefer*, WIPO Case No. [D2012-2020](#)), although the consensus among panelists seems to be that such an order should only be made in exceptional circumstances. [WIPO Overview 3.1](#), sections 1.12 and 4.13.

This Panel adopts the consensus view that there is no basis for denying the Complainant the remedy of transfer merely because the disputed domain name contains, in addition to the Complainant's SSSTIK trademark, a trademark owned by a third-party. This transfer does not preclude the third-party trademark owner from bringing an action under the Policy or relevant law against the Complainant if that trademark owner considers the Complainant's holding of the disputed domain name to be in violation of the Policy or applicable law. See, for example, *WhatsApp Inc. v. Private Whois whatsappandroid.com*, *Private Whois whatsappipad.com* and *Private Whois whatsappiphone.com*, WIPO Case No. [D2012-0674](#); *Ulysses GmbH & Co. KG v. Domain Protection Services, Inc. / Catalina DC*, WIPO Case No. [D2020-3240](#); *Pfizer Inc. v. WhoisGuard Protected, WhoisGuard, Inc. / Naci Ozarar*, WIPO Case No. [D2021-0018](#); *Stichting BDO v. ShenZhaoYong*, WIPO Case No. [D2021-0278](#); and *LEGO Juris A/S v. Mudasser Akram*, WIPO Case No. [D2022-4707](#).

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 <ssstiktok.tools> be transferred to the Complainant.

The transfer of the disputed domain name without prejudice to any rights of the owner of the TIKTOK trademark.

/John Swinson/

John Swinson

Sole Panelist

Date: July 6, 2026