

ADMINISTRATIVE PANEL DECISION

Tea Dating Advice Inc. v. Pridachin Alexandr
Case No. D2026-1929

1. The Parties

The Complainant is Tea Dating Advice Inc., United States of America ("United States"), represented by Gibson, Dunn & Crutcher, LLP, United States.

The Respondent is Pridachin Alexandr, Russian Federation.

2. The Domain Name and Registrar

The disputed domain name <tea-app.com> is registered with Registrar of Domain Names REG.RU LLC (the "Registrar").

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the "Center") on May 5, 2026. On May 5, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 6, 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 May 7, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint.

On May 7, 2026, the Center informed the parties in Russian and English, that the language of the registration agreement for the disputed domain name is Russian. On May 13, 2026, the Complainant filed an amended confirming its request that English be the language of the proceedings. The Respondent did not submit any comment on the Complainant's submission but on May 20, 2026, sent email communications to the Center in English.

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 in English and Russian of the Complaint, and the proceedings commenced on May 18, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 7, 2026. The Respondent sent email communications in English to the Center on May 20, 2026.

The Center appointed Adam Taylor, Phillip V. Marano, and Olga Zalomiy as panelists in this matter on July 6, 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.

4. Factual Background

The Complainant operates an online platform/app under the mark TEA DATING ADVICE that allows women to take safety precautions when engaging in online dating. The Complainant's app has had over one million downloads and over 28,000 reviews.

The Complainant owns United States registered trade mark No. 8023994 for TEA DATING ADVICE, filed on October 3, 2022, registered on November 11, 2025, in class 9, with a first use date of January 16, 2023, where the element "dating advice" is disclaimed.

On August 1, 2025, the Complainant has also filed an application No. 99316295 for a United States trade mark TEA FOR WOMEN. This trade mark application is still pending at the time of this Decision.

The Complainant operates a website at "www.teaforwomen.com".

The disputed domain name was registered on December 14, 2025.

As of April 16, 2026, the disputed domain name resolved to a website that purported to offer women's dating services and was a substantial copy of the Complainant's own website including use of the Complainant's exact logo.

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 Respondent is impersonating the Complainant likely in an attempt to phish for personal and financial information from the Complainant's customers.

B. Respondent

In its email communication (received from an email address associated with the disputed domain name), the Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Respondent contends that:

- the disputed domain name does not reproduce the Complainant's alleged trade mark rights in the "terms TEA FOR WOMEN" and TEA DATING ADVICE, or contain the words "for women" or "dating advice," and it is therefore not identical to those marks;
- the Respondent's use of the disputed domain name is based on the ordinary and widely understood meaning of the common English word "tea" and the Complainant cannot monopolise every domain name

containing this generic word, especially where the disputed domain name does not reproduce the Complainant's full alleged trade marked phrases;

- the Respondent has rights and legitimate interests in the disputed domain name as it was selected for an independent project using the common word "tea" together with the descriptive term "app";
- the Respondent denies any bad faith registration or use;
- the Respondent did not register the disputed domain name for the purpose of sale to the Complainant, preventing the Complainant from reflecting its mark in a domain name, disrupting the Complainant's business, or misleading users into believing that the website is owned, sponsored, or endorsed by the Complainant;
- any overlap in the general field of social commentary, dating-related discussion, or consumer advice does not by itself establish cybersquatting, bad faith, or lack of legitimate interest;
- the UDRP is intended to deal with abusive domain name registrations, not for resolving broader business competition or trade mark disputes where the parties operate independent projects; and
- if the Complainant believes it has broader trade mark or unfair competition claims, those issues should be addressed in court, where the parties can present full evidence, discovery, and legal arguments, and the Respondent is prepared to defend such a case.

6. Discussion and Findings

6.1. Procedural Issue – Language of the Proceedings

Pursuant to paragraph 11 of the Rules, unless otherwise agreed by the parties or specified otherwise in the registration agreement, the default language of the proceedings is the language of the registration agreement, subject to the authority of the panel to determine otherwise, having regard to the circumstances of the administrative proceedings.

The language of the registration agreement for the disputed domain name is Russian. There is no indication that the registration agreement specifies that any other language should apply and there has been no agreement between the Parties that the proceedings should be in English.

The Complainant has requested that English be the language of the proceedings and has submitted the Complaint in English.

Section 4.5.1 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), sets out certain scenarios that panels have considered warranted proceeding in a language other than that of the registration agreement.

In this case, the Panel notes the following:

1. the language/script of the disputed domain name and the Complainant's marks are both in English;
2. the webpage under the disputed domain name is in English;
3. the Respondent has filed a Response in English and has not objected to the Complainant's request that English be the language of the proceedings; and
4. the Respondent has used the disputed domain name to target a United States-based company (see the Panel's conclusion under the third element below).

Taking all these matters together, the Panel concludes that in the circumstances there is a reasonable likelihood that the Respondent is conversant in the English language, that the Respondent is unlikely to be prejudiced should English be adopted as the language of the proceedings and that to require translation of the Complaint would be potentially unfair, involving undue cost and delay to the case.

Accordingly, in accordance with paragraph 11 of the Rules, the Panel determines that English should be the language of the proceedings.

6.2. Substantive Issues

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 trade mark and the disputed domain name. [WIPO Overview 3.1](#), section 1.7.

The Complainant has shown rights in respect of a trade mark for TEA DATING ADVICE for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds that the dominant element of the Complainant's registered TEA DATING ADVICE mark, namely the term "tea", is recognisable, indeed prominent, within the disputed domain name.

Although the addition of other terms (here, "app") 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 for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

Moreover, the Panel notes that the Respondent has registered and used the disputed domain name to host near-identical copycat website content, making unauthorised use of the Complainant's logos and copywritten images to impersonate the Complainant, likely in connection with website phishing or other illegal activity. The Respondent's conduct and website content therefore serve as prima facie evidence that the Respondent has purposefully targeted the Complainant and the Complainant's TEA DATING ADVICE mark through the disputed domain name, which supports a finding of confusing similarity. [WIPO Overview 3.1](#), section 1.15. Accordingly, the disputed domain name is confusingly similar to the registered mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The Respondent relies on the fact that the terms "dating advice" do not appear in the disputed domain name. However, as discussed above, it is sufficient for the Complainant to establish that the disputed domain name is confusingly similar to its mark – and the Complainant has done so based on the fact that the disputed domain name recognisably contains the term "tea", a dominant element of the Complainant's mark.

The Respondent asserts that the Complainant cannot monopolise the common English word "tea". However, issues such as the strength of a complainant's mark are decided under the second and third elements. Panels view the first element as a threshold test concerning a trade mark owner's standing to file a UDRP complaint, i.e., to ascertain whether there is a sufficient nexus to assess the principles captured in the second and third elements. [WIPO Overview 3.1](#), section 1.7. And, in any event, as discussed below, issues such as strength of a complainant's mark do not assist the respondent in cases such as this where the Respondent has clearly engaged in impersonation, and likely other illegal activity.

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 recognised 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.

As to paragraph 4(c)(i) of the Policy, and as further discussed under the third element below, the Panel considers that the Respondent has used the disputed domain name to intentionally attempt to attract, confuse, and profit from Internet users seeking the Complainant's services by impersonating the Complainant. This is true even though the terms "dating advice" are disclaimed in the relevant mark. Such use of the disputed domain name is not bona fide.

Nor is there any evidence that paragraphs 4(c)(ii) or (iii) of the Policy are relevant in the circumstances of this case.

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 considers that the Respondent has intentionally attempted to attract Internet users to a website for commercial gain by creating a likelihood of confusion with the Complainant's trade mark in accordance with paragraph 4(b)(iv) of the Policy.

First, the disputed domain name comprises the dominant element of the Complainant's TEA DATING ADVICE mark plus the term "app", which is highly relevant to the Complainant's services.

Second, the Respondent has used the disputed domain name for a website that impersonates the Complainant by use of a substantial copy of the Complainant's web page including the Complainant's exact mark/logo and pictorial and literary content, likely in an attempt to phish for account credentials and financial information belonging to the Complainant's customers, as well as possibly perpetrate further illegal activity.

The Respondent claims that it selected the disputed domain name for an independent project using the common word "tea" together with the descriptive term "app", and that its website merely constitutes "overlap in the general field of social commentary, dating-related discussion, or consumer advice". This contention is implausible given the lack of any detail or evidence regarding the alleged independent project, combined with the Respondent's apparent and unexplained impersonation of the Complainant.

The Respondent further asserts that, if the Complainant believed it had broader trade mark or unfair competition claims, it should have taken those matters to court. While it is open to the Complainant to go to court to pursue wider intellectual property or other claims if it considers that it has grounds to do so, that possibility by no means prevented the Complainant from filing this Complaint if it considered that it had a basis to establish the three elements under the Policy.

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 <tea-app.com> be transferred to the Complainant.

/Adam Taylor/

Adam Taylor

Presiding Panelist

/Phillip V. Marano/

Phillip V. Marano

Panelist

/Olga Zalomiy/

Olga Zalomiy

Panelist

Date: July 20, 2026