

ADMINISTRATIVE PANEL DECISION

Illia Pustovit, Limited Liability Company SSSTIK (LLC SSSTIK) v. Thuy
Nguyen Thi, HA NOI
Case No. D2026-2179

1. The Parties

The Complainant is Illia Pustovit and Limited Liability Company SSSTIK (LLC SSSTIK), Ukraine, represented by IPMatters OÜ, Estonia.

The Respondent is Thuy Nguyen Thi, HA NOI, Viet Nam.

2. The Domain Name and Registrar

The disputed domain name <ssstik.net> is registered with Name.com, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 20, 2026. On May 20, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 21, 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 (Registration Private, Domain Protection Services, Inc.) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 22, 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 amended Complaint on May 27, 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 Respondent of the Complaint, and the proceedings commenced on June 1, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 21, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on June 22, 2026.

The Center appointed Andrew D. S. Lothian as the sole panelist in this matter on June 26, 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 July 3, 2026, the Panel issued Procedural Order No. 1 to the Parties. This is further described in section 6.1 below.

4. Factual Background

The first Complainant is a Ukrainian individual, and the second Complainant is its related company which carries on the business of providing computer software under the name “SSSTIK” that allows users to download videos from the “Tiktok” platform. As the first and second Complainants are related, the Panel will refer to them as “the Complainant” for convenience unless the context otherwise indicates.

The first Complainant is the owner of United States of America (“United States”) Registered Trademark Number 7084349 in respect of a figurative mark consisting of the text SSSTIK and a device of an arrow pointing vertically down from a horizontal bar, filed on April 22, 2022, and registered on June 20, 2023, in Classes 9, and 42. Said trademark claims a first use in commerce date of June 10, 2020.

The disputed domain name was registered on June 14, 2021. Little is known about the Respondent other than that it appears to be a private individual based in Viet Nam. The website associated with the disputed domain name appears to offer a service that performs the same or a similar service to that of the Complainant, featuring the same look and feel of that of the Complainant’s official website at “www.ssstik.io”, based upon the Complainant’s screenshots dated December 19, 2025 (Complainant’s official website), April 28, 2026 (Respondent’s website), and historic screenshots of the Respondent’s website dated March 29, 2022, and October 2, 2024. The website associated with the disputed domain name makes prominent use of the SSSTIK mark in all screenshot iterations. Said website also provides links to social media, but the destinations of these links do not appear to feature any content.

The Complainant produces an analytics report for its domain name <ssstik.io> from Semrush, which provides an estimate that said domain name would receive approximately 5,300,000 monthly visits from organic search in June 2021. Said report also noted that the said domain name had a “very good” “Authority Score” of 96, typically being a measure of its strength and influence in search engines. The said report also notes that the said domain name is linked to by 6,800 referring websites with around 610,500 individual links. Overall, the report suggests that the said domain name enjoyed a substantial degree of online visibility and discoverability according to Semrush’s methodology.

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 identical to the textual component of its registered trademark.

The Complainant further contends that it has never licensed, authorized, or otherwise permitted the Respondent to use the SSSTIK designation in any manner, including as part of a domain name. The Complainant asserts that the Respondent is not affiliated with the Complainant and that there has never been any business, contractual, or legal relationship between the Parties that could justify the Respondent’s registration and use of the disputed domain name.

The Complainant notes that the disputed domain name resolves to a website that includes a "Contact Us" page which lists several purported communication channels, including Youtube, Twitch, Tumblr, Email, and Telegram, all branded under the disputed domain name. However, upon verification, none of these links function as genuine contact points, as they are not clickable and do not lead to any active accounts or means of communication, with one limited exception, namely a Telegram account which however previously operated under several different usernames. The Complainant contends that use of multiple, unrelated personal-style identifiers, none of which bear any connection to the name "SSSTIK" or any corresponding business entity, demonstrates that the Respondent is not commonly known by the disputed domain name or by the "SSSTIK" designation, and that the use of non-functional or misleading contact information further suggests an attempt to obscure the true identity of the domain name registrant.

The Complainant further contends that the Respondent is not making any bona fide offering of goods or services under the disputed domain name, stating that, 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. On the date of filing of the Complaint, the disputed domain name resolved to a website that impersonated the Complainant and created an impression of being the Complainant's authorized website. Such use is neither legitimate nor fair. To the contrary, it seeks to mislead Internet users into believing that they are dealing with the Complainant or an authorized affiliate thereof in order to attract Internet users for the Respondent's own commercial benefit. Panels under the Policy have consistently held that the use of a domain name for unlawful or deceptive activity, including impersonation, passing off, or falsely suggesting affiliation, can never confer rights or legitimate interests upon a respondent.

The Complainant further contends that the Respondent is clearly not using the disputed domain name for any legitimate noncommercial purpose, noting that the website associated with the disputed domain name is designed to trade on the goodwill of the Complainant's SSSTIK mark and to deceive users into believing that they are interacting with the Complainant's official platform.

The Complainant asserts that the Respondent chose the disputed domain name specifically because it corresponds to the Complainant's distinctive SSSTIK designation and trademark, which had already been used in commerce well before the registration of the disputed domain name. The Complainant's first use in commerce has also been expressly confirmed before the United States Patent and Trademark Office since June 10, 2020. There is no evidence that the Respondent has any independent right, legitimate interest, or prior association with the SSSTIK designation. At the time the disputed domain name was registered on June 14, 2021, the Complainant's own domain name was already attracting a significant volume of user attention and search impressions. The Complainant states that from 2021 through 2026, analytics data show its said domain name's sustained global reach, with tens of millions of monthly visitors and over one hundred million monthly search impressions from users all over the world, confirming that the Complainant is well known internationally, making it implausible that the Respondent was unaware of the Complainant when registering and using the disputed domain name. Given the above, the Complainant submits that the Respondent has no rights or legitimate interests in the disputed domain name.

The Complainant asserts that the disputed domain name was both registered and is being used in bad faith, notwithstanding the fact that the Complainant's trademark registrations postdate the registration of the disputed domain name. Under established practice in Policy jurisprudence, bad faith may still be found where a respondent targets a complainant's unregistered or common law rights that predate the disputed domain name registration. The Complainant contends that the record demonstrates that the Complainant had already established substantial goodwill and public recognition in the SSSTIK designation well before the Respondent's registration and use of the disputed domain name.

The Complainant notes that its website <ssstik.io> was launched as early as November 2020 and was already actively used in commerce long before the registration of the disputed domain name. The Complainant's first use in commerce has additionally been confirmed before the United States Patent and Trademark Office since June 10, 2020. By June 2021, shortly after launch, the Complainant's website had

already generated more than 5 million organic sessions, demonstrating rapid user recognition and strong association between the SSSTIK designation and the Complainant's TikTok downloading services.

The Complainant asserts that the comparison between the websites operated under the domain name <ssstik.io> and the disputed domain name reveals a striking pattern of imitation that cannot plausibly be explained by coincidence. The Complainant contends that the Respondent copied not merely the idea of a TikTok downloader, but multiple distinctive textual, structural, and stylistic elements from the Complainant's earlier website.

The Complainant submits that SSSTIK is not a dictionary term, descriptive phrase, or generic expression naturally connected with TikTok downloaders, adding that the WIPO Global Brand Database further confirms that the Complainant appears to be the only filer and registrant of the SSSTIK mark worldwide, while the Respondent holds no corresponding trademark rights. This further supports the conclusion that the Respondent deliberately selected the disputed domain name because of its association with the Complainant rather than for any independent legitimate reason. Given the distinctive and non-descriptive nature of the SSSTIK identifier, together with the Complainant's significant online presence prior to the Respondent's registration of the disputed domain name, it is evident that the Respondent was aware of the Complainant and intentionally targeted its prior rights and goodwill at the time of registration.

The Complainant asserts that by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the site and the products on it. The Complainant's mark is distinctive and closely associated with a specific online service, namely TikTok video downloading. The Respondent's website offers the same type of service, using the disputed domain name that is confusingly similar to the Complainant's mark. This indicates that the disputed domain name is being used deliberately to attract Internet users by creating a false association with the Complainant. The Respondent's website mirrors the Complainant's offering in substance and presentation, including comparable design elements and identical types of prompts and functionalities related to downloading TikTok videos. Such imitation confirms that the disputed domain name is being used to exploit confusion for competitive gain.

B. Respondent

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

6. Discussion and Findings

6.1. Procedural Issue: Notification of Complaint

It has been brought to the Panel's attention that when the Complaint was notified to the Respondent an email address shown on the website associated with the disputed domain name was inadvertently not included in accordance with paragraph 2(a)(ii)(C) of the Rules. The Panel noted that an identical situation had been considered previously under the Policy, namely, in *Allstate Insurance Company v. GLASS AUTO CLAIMS / Domains by Proxy, Inc.*, WIPO Case No. [D2011-0054](#).

Following the approach taken in such case, the Panel issued Procedural Order No. 1 to the Parties on July 3, 2026, referencing the administrative oversight, noting that other reasonable means including email to the registrant contact email address, the Registrar's web form, and notification by postal mail had all been completed, and in light of the oversight on the additional email address, allowing the Respondent five days to indicate to the Center by return email whether it intended to participate in these proceedings, with the due date for the receipt of any Response being extended to the end of that period. The Center notified Procedural Order No. 1 inter alia to the email address shown on the website associated with the disputed domain name. The Respondent did not file any reply to the said Procedural Order. The Panel therefore proceeds to a Decision.

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 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 Complainant has established unregistered trademark or service mark rights for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.3.

The Panel is satisfied in particular that the Semrush report for the Complainant's domain name <ssstik.io> demonstrates that the Complainant's distinctive SSSTIK mark within said domain name and on the corresponding website had achieved substantial public recognition as a designation of the source of the Complainant's TikTok video download services from about early 2021. It should be noted in particular that the top organic keywords for said site included the terms "tik tok video download" and variants of "tiktok download", and that the site benefited from significant numbers of referring domain names and backlinks. Furthermore, according to a graph in the report, the number of keywords for which the Complainant's site ranked in Google's highly valuable top-three search positions was already growing from a standing start in late 2020 or early 2021, with a small peak in activity in June 2021. The report also shows that the Complainant had organic search competitors, none of which used the SSSTIK mark, the closest competitor name being "snaptik". In these circumstances, the Panel considers that the evidence demonstrates use of SSSTIK in commerce as a distinctive identifier of the Complainant's services and that the mark had acquired the requisite source-identifying significance by the time of registration of the disputed domain name (this latter point is relevant to the third element assessment and will be discussed below).

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

The applicable TLD in a domain name (e.g., ".com", ".club", ".nyc") (here, ".net") is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

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 Respondent is using the disputed domain name for a product that competes with the Complainant's offering, namely a "TikTok Video Downloader," along with related links to video editing software and smart phones which the Panel presumes are monetized. The downloader component of this offering amounts to the same service provided by the Complainant. However, the Respondent's offering cannot be bona fide within the meaning of paragraph 4(c)(i) of the Policy to the extent that the disputed domain name and associated website uses the Complainant's distinctive SSSTIK mark, and that said website features a substantively similar look and feel (including color scheme) to that of the Complainant's website. The said look and feel and presentation of such site are too similar to that of the Complainant to amount to mere coincidence. As far as the Panel is concerned, and in the absence of any explanation from the Respondent, this appears to be an attempt by the Respondent to pass off its website and the disputed domain name as that of the Complainant. This cannot confer rights or legitimate interests upon the Respondent in the circumstances of this case.

The Respondent has not engaged with the administrative proceeding and has provided no submissions or evidence which might have suggested that it had any claim to rights or legitimate interests in the disputed domain name. In the absence of such, and bearing in mind the appearance of the website associated with the disputed domain name and its use of the Complainant's distinctive SSSTIK mark, the Panel has not been able to identify any potential rights and legitimate interests that the Respondent might have attempted to claim had it chosen to participate in this matter.

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 has registered a domain name that is identical to the Complainant's own domain name (except that it is under a different Top-Level Domain) and has used this for a website featuring what appears to be substantially the same Tiktok downloader service offered by the Complainant. The website associated with the disputed domain name features a marked similarity in look and feel to the Complainant's official website.

Although the Respondent registered the disputed domain name in June 2021, which is well before the Complainant's registered trademark rights accrued, the Complainant has demonstrated convincingly that by the date of registration of the disputed domain name, the Complainant's official site had garnered substantial attention from the online community whereby it showed strong traffic rankings and search engine optimization results sufficient to demonstrate that the Complainant already possessed unregistered trademark rights in the distinctive SSSTIK trademark used in such domain name and on such website. Based upon the identical reproduction of that mark in the disputed domain name and its use for a website offering the same service as that offered by the Complainant, with a close approximation of the look and feel of the Complainant's official website, the Panel is satisfied that by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of such website under paragraph 4(b)(iv) of the Policy.

As noted in the immediately preceding section of this Decision, the Respondent has not engaged with this administrative proceeding. It has neither addressed the Complainant's contentions on this topic nor submitted any evidence or arguments which might have suggested that it registered and used the disputed domain name in good faith. In the absence of any such material from the Respondent, and having reviewed the record, the Panel has been unable to identify any basis upon which the Respondent might have sought to establish its case under this element of 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 <ssstik.net> be transferred to the Complainant.

/Andrew D. S. Lothian/

Andrew D. S. Lothian

Sole Panelist

Date: July 22, 2026