ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

# ADMINISTRATIVE PANEL DECISION
Reve AI, Inc. v. hongjiang chen
Case No. D2026-2654

## 1. The Parties

The Complainant is Reve AI, Inc., United States of America ("United States"), represented by Waterman Legal, United States.

The Respondent is hongjiang chen, China.

## 2. The Domain Name and Registrar

The disputed domain name <reve2.app> is registered with Porkbun LLC (the "Registrar").

## 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 18, 2026. On June 18, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same date, 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, Private by Design, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 19, 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 amendment to the Complaint on June 24, 2026.

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 Respondent of the Complaint, and the proceedings commenced on June 25, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 15, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 17, 2026.

The Center appointed Miguel B. O'Farrell as the sole panelist in this matter on July 29, 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, Reve AI, Inc., is involved in the business of computer software for editing, managing, and generating visual content using artificial intelligence ("AI") tools and related services.

The Complainant claims common law rights in the REVE trademark as early as February 5, 2025 in connection with its AI tools and software.

The Complainant's trademark REVE is registered for, succinctly, computer software for editing, managing, and generating visual content using AI tools and related services, including the following registrations:

International Trademark Registration No. 1883716 REVE, registered on September 19, 2025;

United States Trademark Registration No. 99106761 REVE, registered on October 21, 2025; and

European Union Trademark Registration No.1883716 REVE, registered on September 19, 2025.

In addition, the Complaint includes full listings of REVE marks registered or pending applications in jurisdictions around the world.

The disputed domain name was registered on June 4, 2026, and according to the Complaint and at the time of this Decision, resolves to a website advertising the Complainant's image generator AI software under the title "Reve 2.0 - Free AI Image Generator".

## 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 its trademark REVE is an invented fanciful trademark with no meaning in the English language. The Complainant further contends the following:

The Reve computer software and AI tools have been available to consumers since at least as early as February 5, 2025. The Complainant's launch of its computer software created immediate buzz and attention in the media being recognized as "the new best AI image generation model" and for its impressive results in comparative testing against established models at a fraction of the cost.

Upon its launch, the Reve software also garnered significant attention on social media by users praising its capabilities as shown in the Complaint.

Despite Reve only becoming available to consumers in February of 2025, the Complainant's Reve platform has already become widely well known in the software industry and is uniquely associated with the Complainant and its goods and services. In the wake of its remarkable success and in an effort to protect its intellectual property rights the Complainant filed a trademark application for registration of REVE in the United States which was registered on October 21, 2025. The Complainant's common law trademark rights date back to, at the very least, February 5, 2025.

The Respondent does not use the domain name in connection with a bona fide offering of goods and services. The Respondent's aim in registering the disputed domain name is to exploit the goodwill and success of the REVE trademark in order to drive consumers to its website under the guise that the software advertised on the offending website is associated or approved by the Complainant, when that is not the case.

Therefore, the Complainant has requested the Panel to issue a decision ordering that the disputed domain name be transferred to the Complainant.

**B. Respondent**

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

**6. Discussion and Findings**

**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 trademarks or service marks for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The entirety of the Complainant's REVE mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

The addition of the number "2" in the disputed domain name does not prevent a finding of confusing similarity with the Complainant's trademark REVE for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

The generic Top-Level Domain ("gTLD") ".app" will be disregarded by the Panel in the 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 composition of the disputed domain name, consisting of the REVE mark in its entirety plus the number "2" -which may refer to the Complainant's "Reve 2.0" product- cannot constitute fair use as it effectively impersonates or suggests sponsorship or endorsement by the trademark owner, and its use cannot confer rights or legitimate interests on the Respondent as the associated website mimics the Complainant by purportedly providing the Complainant's software product by displaying the Complainant's mark. WIPO Overview 3.1, sections 2.5.1 and 2.13.1.

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.

The Panel is satisfied that the Respondent must have been aware of the Complainant's trademark REVE and trade name when it registered the disputed domain name, especially given the nature of the disputed domain name and the content on the associated website as mentioned above. WIPO Overview 3.1, section 3.2.2.

In accordance with section 3.1.4 of the WIPO Overview 3.1, the Panel considers that the inclusion of the Complainant's widely known REVE trademark in the disputed domain name, plus the number "2" referring to the Complainant's "Reve 2.0" product in view of the content on the associated website, by the Respondent who has no relationship with the Complainant, creates a presumption of bad faith registration. The Respondent, when registering the disputed domain name, targeted the Complainant's business and its trademark REVE, with the intention to confuse Internet users and capitalize on the fame of the Complainant's trademark for its own monetary benefit.

The fact that there is an absence of rights or legitimate interests coupled with no credible explanation for the Respondent's choice of the disputed domain name is also a significant factor that contributes to the finding that the disputed domain name was registered in bad faith (as stated in section 3.2.1 of the WIPO Overview 3.1).

Panels have held that the use of a domain name for illegitimate activity (here, claimed passing off) constitutes bad faith. WIPO Overview 3.1, section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

The Panel finds that the requirements of paragraph 4(a)(iii) of the Policy have been fulfilled, and 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 <reve2.app> be transferred to the Complainant.

*/Miguel B. O'Farrell/*
**Miguel B. O'Farrell**
Sole Panelist
Date: August 4, 2026