

ADMINISTRATIVE PANEL DECISION

PayPal, Inc. v. Dynadot Privacy Service, Dynadot, LLC
Case No. D2026-2870

1. The Parties

The Complainant is PayPal, Inc., United States of America ("United States" or "US"), represented by Stobbs IP Limited, United Kingdom.

The Respondent is Dynadot Privacy Service, Dynadot, LLC, United States.

2. The Domain Name and Registrar

The disputed domain name <careerspayspal.com> 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 July 1, 2026. On July 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 2, 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 July 2, 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 July 2, 2026. The Complainant filed another amended Complaint to rectify a clerical error on July 22, 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 July 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 23, 2026.

The Center appointed Andrew J. Park as the sole panelist in this matter on July 23, 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, PayPal, Inc., is an American multinational financial technology company founded in 1998. Since the launch of its online payment platform in 1999, the Complainant has provided online payment software and related financial services in more than 200 markets worldwide. The Complainant has operated its official website at “www.paypal.com” since 1999 and its online payment platform currently serves approximately 426 million active user accounts.

The Complainant is the owner of numerous trademark registrations for the PAYPAL mark worldwide, including multiple United States federal trademark registrations. The PAYPAL mark has been used continuously in connection with the Complainant’s online payment services since 1999 and was first registered in the United States in 2002. As a result of the Complainant’s longstanding and extensive use, the PAYPAL mark has become widely recognized in connection with the Complainant’s online payment services. The Complainant’s trademark rights in the PAYPAL mark long predate the Respondent’s registration of the disputed domain name.

The Complainant owns numerous trademark registrations, including the following US registrations:

Trademark	Serial No.	Registration No.	Registration Date	Goods / Services
PAYPAL	75/982,715	2,646,490	November 5, 2002	Electronic payment and financial services
	86/264,543	5,370,326	January 2, 2018	Downloadable software; Electronic payment and financial services; and others
PAYPAL	88/550,849	6,208,608	December 1, 2020	Downloadable software; Electronic payment and financial services; and others
	90/047,567	6,466,599	August 31, 2021	Downloadable software; Electronic payment and financial services; and others
	90/502,290	7,565,659	November 12, 2024	Downloadable software; Electronic payment and financial services; and others

The Complainant has maintained an extensive trademark portfolio for the PAYPAL mark, including both word marks and composite marks, with registrations spanning more than two decades.

The disputed domain name <careerspayspal.com> was registered by the Respondent on June 19, 2026. The identity of the Respondent was initially unknown because the registrant information had been redacted. Following the Registrar’s disclosure, the Complainant filed an amended Complaint identifying the Respondent on July 2, 2026.

At the time of this Decision, the disputed domain name does not resolve to an active website. However, the disputed domain name previously resolved to a website with pay-per-click (“PPC”) link advertisements. In addition, the disputed domain name has been used for a fraudulent email scheme which will be discussed in detail below.

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.

(1) Identical or Confusingly Similar

The Complainant asserts that the disputed domain name is confusingly similar to the Complainant's PAYPAL trademark, in which the Complainant has established prior rights. The Complainant submits that it has used the PAYPAL mark continuously for more than two decades in connection with its online payment software and related financial services. According to the Complainant, such longstanding and extensive use has generated substantial goodwill and worldwide recognition, such that the PAYPAL mark has become a distinctive identifier exclusively associated with the Complainant.

The Complainant further contends that the disputed domain name incorporates the PAYPAL mark in its entirety as its dominant and distinctive element. The mere addition of the term "careers", a descriptive and non-distinctive term, does not distinguish the disputed domain name from the Complainant's PAYPAL trademark or diminish the confusing similarity between them. Rather, the addition of such a term reinforces the impression that the disputed domain name is associated with the Complainant's employment or recruitment activities.

Finally, the Complainant submits that the generic Top-Level Domain ("gTLD") ".com" should be disregarded for purposes of the confusing similarity analysis, as it is a standard technical requirement of domain name registration.

(2) Rights or Legitimate Interests

The Complainant asserts that the Respondent has no rights or legitimate interests in the disputed domain name. The disputed domain name is not being used for a bona fide offering of goods or services, nor is it being used for a legitimate noncommercial or fair use. Instead, the Complainant submits that the disputed domain name currently resolves to parking page displaying PPC link advertisements. Further, the Complainant reasonably infers its primary use is in relation to a fraudulent phishing recruitment scam, and is used for fraudulent emails. The Complainant also contends that the Respondent has never legitimately been known by the name "paypal" or "careers" at any point in time.

The Complainant therefore contends that the Respondent has no rights or legitimate interests in the disputed domain name.

(3) Registered and Used in Bad faith

The Complainant asserts that the Respondent's registration and use of the disputed domain name constitutes bad faith under the UDRP. The Respondent registered the disputed domain name with knowledge of the Complainant's prior rights in the PAYPAL trademark. The Complainant's trademarks were established many years before the registration of the disputed domain name, and the PAYPAL mark is widely recognized internationally. The Respondent's registration of a domain name incorporating the PAYPAL mark cannot be regarded as coincidental, but rather reflects a deliberate attempt to exploit the Complainant's established brand identity and reputation.

The Complainant further contends that the Respondent used the disputed domain name to impersonate the Complainant and conduct a fraudulent recruitment scheme. The Respondent created and used an email address associated with the disputed domain name to send deceptive job-related communications to potential candidates, falsely suggesting an affiliation with or authorization from the Complainant. The Complainant confirms that the Respondent was not authorized to conduct recruitment activities or any other activities on behalf of the Complainant.

The Complainant submits that the use of the disputed domain name for fraudulent communications constitutes clear evidence of bad faith use under paragraph 4(b)(iv) of the Policy, as the Respondent intentionally attempted to create a likelihood of confusion among Internet users as to the source, sponsorship, affiliation, or endorsement of the communications. The Complainant further submits that the Respondent's conduct follows a pattern similar to a previous recruitment scam conducted through another domain name registration. The repeated use of a similar recruitment scheme demonstrates that the Respondent's conduct was not an isolated incident, but rather part of a deliberate pattern of impersonation and fraudulent activity targeting the Complainant.

Accordingly, the Complainant contends that the Respondent has registered and used the disputed domain name primarily to exploit the Complainant's trademark rights, impersonate the Complainant, and deceive Internet users for fraudulent purposes. The Complainant therefore submits that the Respondent has acted in bad faith under paragraph 4(a)(iii) and paragraph 4(b)(iv) of the Policy.

B. Respondent

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

6. Discussion and Findings

A. Identical or Confusingly Similar

This element consists of two parts: first, whether the Complainant has rights in a relevant trademark and, second, whether the disputed domain name is identical or confusingly similar to that trademark.

The Panel finds that the Complainant has established registered rights in the PAYPAL trademark, which was first registered in 2002 and substantially predates the registration of the disputed domain name in 2026. The PAYPAL mark has been used extensively in connection with the Complainant's online payment and financial services and has acquired significant recognition worldwide.

The disputed domain name incorporates the PAYPAL mark in its entirety as the dominant and recognizable element. The addition of the term "careers", which is descriptive in nature and relates to employment or recruitment activities, does not prevent a finding of confusing similarity.

In determining whether a domain name is identical or confusingly similar to a trademark, the gTLD is typically disregarded for purposes of comparison (see WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.11.1).

For these reasons, pursuant to the Policy, paragraph 4(a)(i), the Panel finds that the disputed domain name is confusingly similar to the Complainant's trademark and that the first element of the Policy has been established.

B. Rights or Legitimate Interests

Pursuant to paragraph 4(a)(ii) of the Policy, the Complainant is required to make out a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name. Once such a prima facie case is made, the burden of production shifts to the Respondent to come forward with relevant evidence demonstrating its rights or legitimate interests in the disputed domain name. If the Respondent fails to do so, the Complainant is deemed to have satisfied paragraph 4(a)(ii) of the Policy. [WIPO Overview 3.1](#), section 2.1.

Pursuant to paragraph 4(c) of the Policy, the Respondent may establish its rights or legitimate interests in the disputed domain name, among other circumstances, by showing any of the following elements:

(i) before any notice to the Respondent of the dispute, the Respondent's use of, or demonstrable preparations to use, the disputed domain name or a name corresponding to the disputed domain name in connection with a bona fide offering of goods or services; or

(ii) the Respondent (as an individual, business, or other organization) has been commonly known by the disputed domain name, even if it has acquired no trademark or service mark rights; or

(iii) the Respondent is making a legitimate noncommercial or fair use of the disputed domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

Here, having reviewed the available records, the Panel finds that 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 failed to provide any evidence demonstrating rights or legitimate interests in the disputed domain name.

The Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name within the meaning of paragraph 4(a)(ii) of the Policy. The Complainant has not authorized, licensed, or otherwise permitted the Respondent to use its PAYPAL trademark or to conduct recruitment activities on its behalf. There is no evidence of any relationship between the Parties that would give rise to any rights or legitimate interests in the disputed domain name. Furthermore, the Respondent has not been commonly known by the disputed domain name, nor has it made a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain name.

The disputed domain name incorporates the Complainant's PAYPAL trademark in its entirety, with the addition of the descriptive term "careers". Such composition creates an apparent association with the Complainant's recruitment activities rather than indicating any legitimate interest of the Respondent. Moreover, the Respondent's use of the disputed domain name to create an email address associated with the disputed domain name and to send fraudulent recruitment communications impersonating the Complainant constitutes compelling evidence that the Respondent lacks any rights or legitimate interests in the disputed domain name. Such deceptive use for phishing and impersonation purposes cannot establish rights or legitimate interests under the Policy.

The disputed domain name previously resolved to a parking page displaying PPC link advertisements. Such use does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use of the disputed domain name under the circumstances of this case.

In the absence of any response from the Respondent and any credible evidence to the contrary, the Panel concludes that the Respondent has no rights or legitimate interests in the disputed domain name.

Accordingly, the Panel holds that the Respondent has no rights or legitimate interests in the disputed domain name pursuant to paragraph 4(a)(ii) of the Policy and the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy provides a non-exclusive list of circumstances that evidence registration and use of a domain name in bad faith. Any one of the following is sufficient to support a finding of bad faith:

(i) circumstances indicating that the respondent has registered or acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark, or to a competitor of that the complainant, for valuable consideration in excess of the respondent's documented out-of-pocket costs directly related to the domain name; or

(ii) the respondent has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that the respondent has engaged in a pattern of such conduct; or

(iii) the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the respondent's website or location or of a product or service on the respondent's website or location.

The Complainant claims that the Respondent registered and is using the disputed domain name in bad faith in violation of paragraph 4(a)(iii) of the Policy. In particular, the Complainant contends that the Respondent's conduct falls squarely within the scope of paragraph 4(b)(iv) of the Policy, as the Respondent registered the disputed domain name in an attempt to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's trademark.

The Complainant claims that the Respondent deliberately targeted the PAYPAL trademark by registering a disputed domain name incorporating the Complainant's mark and using it to impersonate the Complainant in connection with a fraudulent recruitment scheme.

As stated previously, the Respondent did not file any response to the Complaint and therefore failed to rebut the Complainant's allegations concerning the Respondent's bad faith registration and use of the disputed domain name. Nevertheless, the Panel remains responsible for determining whether the evidence establishes bad faith under the Policy.

The Panel finds that the Respondent registered the disputed domain name with actual knowledge of the Complainant's PAYPAL trademark and used the disputed domain name to exploit the reputation and goodwill associated with the Complainant's mark. The Complainant's rights in the PAYPAL trademark substantially predate the registration of the disputed domain name, and the PAYPAL mark has achieved extensive international recognition through longstanding use in connection with the Complainant's online payment and financial services. Moreover, the incorporation of the PAYPAL mark in the disputed domain name, combined with the term "careers," demonstrates that the Respondent intentionally targeted the Complainant's trademark and created an apparent affiliation with the Complainant.

The evidence further demonstrates that the Respondent used the disputed domain name to carry out a fraudulent impersonation scheme. The Respondent created an email address associated with the disputed domain name and used it to send deceptive job-related communications, falsely suggesting that such communications originated from or were authorized by the Complainant. By leveraging the trust and recognition associated with the PAYPAL brand, the Respondent intentionally sought to attract Internet users through a misleading appearance of affiliation with the Complainant. Such conduct constitutes bad faith under paragraph 4(b)(iv) of the Policy, as the Respondent attempted to obtain an improper commercial benefit through a fraudulent recruitment scheme designed to exploit individuals who were misled by the Respondent's false association with the Complainant.

The Complainant has also presented evidence that the Respondent's conduct bears similarities to a previous recruitment scam conducted through another domain name registration, including the use of a comparable fraudulent recruitment method. These similarities further support the conclusion that the disputed domain name was not registered for any legitimate purpose, but was part of a deliberate scheme to misuse the Complainant's brand identity and deceive Internet users.

The Respondent has provided no explanation or evidence to justify its registration and use of the disputed domain name and has remained silent throughout these proceedings. Considering the totality of the circumstances, including the fame of the PAYPAL trademark, the deliberate incorporation of the mark into the disputed domain name, and the Respondent's subsequent fraudulent use of the disputed domain name,

the Panel finds that the Respondent has registered and used the disputed domain name as a means to impersonate the Complainant and exploit the goodwill associated with its trademark.

Accordingly, the Panel concludes that the Respondent's conduct falls squarely within paragraph 4(b)(iv) of the Policy and that the third element of the Policy has been established, i.e., the Respondent registered and is using the disputed domain name in bad faith pursuant to paragraph 4(a)(iii) 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 <careerspays.com> be transferred to the Complainant.

/Andrew J. Park/

Andrew J. Park

Sole Panelist

Date: July 23, 2026