

ADMINISTRATIVE PANEL DECISION

Concora Credit Inc. v. Abdul Quader; Dot360 Technologies, Techeradar; John Wick; Dimos Constantinou, Clickout Media Limited; and Salim Shaik
Case No. D2026-3374

1. The Parties

The Complainant is Concora Credit Inc., United States of America ("United States"), represented by Stoel Rives, LLP, United States.

The Respondents are Abdul Quader, Bangladesh ("Registrant C"); Dot360 Technologies, Techeradar, Pakistan ("Registrant A"); John Wick, India ("Registrant B"); Dimos Constantinou, Clickout Media Limited, Malta ("Registrant D"); and Salim Shaik, Bangladesh ("Registrant E").

2. The Domain Names and Registrars

The disputed domain names <milestoneapply.cards> ("Domain Name A"), <mymilestonecard.com> ("Domain Name B"), and <mymilestonecard.net> ("Domain Name C") are registered with Dynadot Inc ("Dynadot").

The disputed domain name <mymilestonecard.cc> ("Domain Name D") is registered with GoDaddy.com, LLC ("GoDaddy").

The disputed domain name <mymilestonecard.org> ("Domain Name E") is registered with Hosting Concepts B.V. d/b/a Registrar.eu ("Registrar.eu").

Dynadot, GoDaddy, and Registrar.eu are collectively referred to as the "Registrars".

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 29, 2026.¹ On July 30, 2026, the Center transmitted by email to the Registrars a request for registrar verification in connection with the Domain Names. On July 31, August 3, and August 4, 2026, the Registrars transmitted by email to the Center their verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondents (Super Privacy Service LTD c/o

¹ The Complainant was originally filed involving six domain names, one of which was removed from the proceeding.

Dynadot/ REDACTED FOR PRIVACY/ Domains by Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 7, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints for the Domain Names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all Domain Names are under common control. The Complainant filed an amended Complaint on August 14, 2026.

On August 15, 2026, the Center received an email communication from one of the Respondents indicating that it had surrendered the Domain Name A. On August 17, 2026, the Center informed the Parties that if they would like to explore settlement options, the Complainant should submit a request to suspend the proceeding. On August 19, 2026, the Complainant requested the Center to continue the proceeding without suspension.

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 Respondents of the Complaint, and the proceedings commenced on August 31, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 20, 2026. The Respondents did not file any formal response. On September 22, 2026, the Center informed the Parties that it would proceed with panel appointment.

The Center appointed Karen Fong as the sole panelist in this matter on September 28, 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 provides consumer credit and credit card services, including servicing credit card programs originated by third party financial institutions throughout the United States under the brand MILESTONE. The MILESTONE trade mark is registered under the United States Registration Number 6168920 as of October 6, 2020 (the "Trade Mark"). The Complainant claims that the MILESTONE mark was first used in commerce in 2008. The Milestone credit cards are issued by the Bank of Missouri.

The Complainant provides authorised user account access to MILESTONE branded credit card services through its official websites at the domain names <milestonegoldcard.com> and <concoracredit.myfinanceservice.com>. The Complainant also owns the domain name <mymilestonecard.com>, which redirects to the website at "concoracredit.myfinanceservice.com".

The Domain Names and the websites they resolve to (the "Websites") are set out below:

No.	Domain Name	Creation Date	Registrant No.	Registrar	Website & Comments
A	<milestoneapply.cards>	December 2, 2021	A	Dynadot	Resolved to a website purporting to offer, and help users apply for a MILESTONE credit card, requiring them to provide sensitive personal details. The Complainant's branding is used including an image of its MILESTONE credit card. A general disclaimer "This is an independent website, and is not associated with any merchant mentioned in any of the guidance" appeared at the footer of the Website. The Website is inactive at the date of this decision.
B	<mymileestonecard.com>	June 6, 2025	B	Dynadot	Resolves to a "MyMilestoneCard" website purporting to guide users to login their "MILESTONE credit card services" with personal details. Non-affiliation with the Complainant is stated in a footer disclaimer. On visiting the Website, the Panel was subjected to a tech support scam that locked the screen and displayed a fake Microsoft security alert designed to alarm users into disclosing their username and password.
C	<mymilestonecard.net>	December 26, 2020	C	Dynadot	Resolved to website titled "MyMilestoneCard", purporting to guide users to login their Milestone accounts with personal details, and claiming that the card is also known as the Milestone Gold Mastercard and is issued by the Bank of Missouri. The Complainant's branding is used including an image of its MILESTONE credit card. Non-affiliation with the

					Complainant is stated in a footer disclaimer. The Website is inactive at the date of this decision.
D	<mymilestonecard.cc>	November 22, 2024	D	GoDaddy	Resolved to website titled “MyMilestoneCard”, purporting to guide users to login their Milestone accounts with personal details, and claiming that the card is issued by the Bank of Missouri in partnership with the Complainant. The Complainant’s branding is used including an image of its MILESTONE credit card. The Website is inactive at the date of this decision.
E	<mymilestonecard.org>	December 26, 2020	E	Registrar.e u	Resolved to website titled “MyMilestoneCard”, purporting to guide users to login their Milestone accounts with personal details, and claiming that the card is issued by the Bank of Missouri. The Complainant’s branding is used including an image of its MILESTONE credit card. Non-affiliation with the Complainant is stated in a footer disclaimer. The Website is inactive at the date of this decision.

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 Domain Names.

Notably, the Complainant contends that the Domain Names are confusingly similar to the Trade Mark in which it has rights, that the Respondents have no rights or legitimate interests with respect to the Domain Names, and that the Domain Names were registered and are being used in bad faith. The Complainant requests transfer of the Domain Names.

B. Respondents

Apart from the email communication from one of the Respondents, indicating “I have already surrendered /closed /data removed /site taken down the said domain i.e. milestoneapply.cards which I own”, the Respondents did not formally reply to the Complainant’s contentions.

6. Discussion and Findings

6.1. Preliminary Issue - Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the Domain Name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple Domain Name registrants pursuant to paragraph 10(e) of the Rules.

The Domain Name registrants did not specifically comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the Domain Names or corresponding websites are subject to common control and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.11.2.

As regards common control, the Panel notes the following:

- (1) All the Domain Names comprise the Trade Mark as part of the Domain Names;
- (2) The Domain Names B to E follow the similar naming structure using the term "my" before the Trade Mark or a misspelling of the Trade Mark, followed by the term "card", while the Domain Name A uses the Trade Mark, followed by the term "apply", both of which are terms descriptive of the Complainant's products;
- (3) The Domain Names A, B, and C are registered through the same Registrar, Dynadot. The Domain Name D was also registered through Dynadot until January 2026;
- (4) All the Websites make a reference to the Trade Mark and have targeted the Complainant's credit card services, and have used the Complainant's branding and images. All the Websites also have highly similar content and language used very much suggesting an affiliation with the Trade Mark and the Complainant;
- (5) The Domain Names B, C, and E have the same captured site IP address;
- (6) One of the nominally named registrants, "John Wick" or Registrant B is also a nominally named registrant in a UDRP case involving the Complainant (*Concora Credit Inc. v. Camela Andrew, Out Reach, John Wick, Sunil Gupta, host cob*, WIPO Case No. [D2026-1785](#)) which resulted in a consolidation order and transfer of the domain names. As the Panel observed in that case, the name "John Wick" is highly likely to be fictitious as this is the name of the character of an action thriller; and
- (7) Some of the registrant information appears to be made up and is unverifiable.

The evidence submitted points to the fact that all the Domain Names are most likely subject to common control by the Respondents. The above pattern evidences common conduct based on the registration and use of the Domain Names and that such conduct interferes with the Trade Mark. The Respondents had the opportunity but did not formally respond to the Complaint. As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different Domain Name registrants (referred to below as "the Respondent") in a single proceeding.

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 Domain Names. [WIPO Overview 3.1](#), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the entirety of the Trade Mark or a misspelled version of the Trade Mark is reproduced within the Domain Names. Accordingly, the Domain Names are confusingly similar to the Trade Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

While the addition of the terms "my" before the Trade Mark or a misspelled version of the Trade Mark and/or "card" or "apply" after the Trade Mark or a misspelled version of the Trade Mark may bear on assessment of the second and third elements, the Panel finds the addition of these elements does not prevent a finding of confusing similarity between the Domain Names and the Trade Mark for the purposes of the Policy. [WIPO Overview 3.1](#), sections 1.8 and 1.9.

Based on the available record, 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.

While the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the often impossible 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. 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 record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the Domain Names. 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 Domain Names such as those enumerated in the Policy or otherwise.

Based on the available record, 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 must have been aware of the Trade Mark when it registered the Domain Names given the reputation of the Trade Mark and the fact that all the Domain Names have either the terms "card" or "apply" which are descriptive of the core products of the Complainant. It is therefore implausible that the Respondent was unaware of the Complainant when it registered the Domain Names.

The [WIPO Overview 3.1](#), section 3.2.2 states as follows:

“Noting the near instantaneous and global reach of the Internet and search engines, and particularly in circumstances where the complainant’s mark is widely known (including in its sector) or highly specific and a respondent cannot credibly claim to have been unaware of the mark (particularly in the case of domainers), panels have been prepared to infer that the respondent knew, or have found that the respondent should have known, that its registration would be identical or confusingly similar to a complainant’s mark. Further factors including the nature of the domain name, the chosen top-level domain, any use of the domain name, or any respondent pattern, may obviate a respondent’s claim not to have been aware of the complainant’s mark.”

The fact that there is a clear absence of rights or legitimate interests coupled with the Respondent’s choice of five Domain Names without any explanation is also a significant factor to consider (as stated in [WIPO Overview 3.1](#), section 3.2.1). The Domain Names fall into the category stated above and the Panel finds that the registration is in bad faith.

The Domain Names are also being used in bad faith. The unauthorised use of the Complainant’s Trade Mark, its images and offer of a credit card bearing the Trade Mark without authorisation are calculated to mislead Internet users to believe its affiliation with the Complainant. Further, the number of Domain Names involved is a clear indication of a serial cybersquatting ring.

All of the Websites make reference to the Trade Mark and target the Complainant’s credit card services. They make use of the Complainant’s branding and images, and their content and language are similar to those of the Complainant’s own website. Taken together, these features strongly suggest an affiliation with the Complainant and the Trade Mark.

Indeed, the content of some of the Websites has been calculated to give the impression that they have been authorised by or connected to the Complainant when this is not the case. These Websites were set up to deliberately mislead Internet users into believing that they are connected to, authorised by, or affiliated with the Complainant. The Respondent employed the fame of the Trade Mark to attract Internet users to the Websites instead of the Complainant’s.

Although four of the Websites contain some form of disclaimer indicating a lack of relationship with the Complainant, the Panel notes that it is necessary to scroll through a considerable amount of material before reaching it. Such a statement is unlikely to be seen by most Internet users, who by then will already have been drawn in by the misleading overall impression created by the Domain Names and the content of the Websites. A disclaimer of this kind does not dispel the confusion, and cannot cure the Respondent’s bad faith (see [WIPO Overview 3.1](#), section 3.7).

From the above, the Panel concludes that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to the Websites by creating a likelihood of confusion with the Trade Mark as to the source, sponsorship, affiliation or endorsement of the Websites, within the meaning of paragraph 4(b)(iv) of the Policy.

Further, the use of the Domain Names in this manner enables the Respondent to solicit and collect sensitive personal and payment information, including credit card details. This gives rise to a serious risk of phishing and other forms of financial fraud, and further supports a finding of bad faith.

The Panel notes that it visited the Website at Domain Name B on October 19, 2026 in the course of its limited independent research, as panels are permitted to do (see [WIPO Overview 3.1](#), section 4.8). On doing so, the Panel was itself presented with what appears to be a tech support scam. On pressing one of the links, the Website locked the Panel’s screen and a loud recorded voice announced a purported Microsoft security alert, audible throughout the Panel’s office, evidently designed to alarm the visitor into disclosing their username and password. The Panel is satisfied that some of the Websites appear to be used for alleged phishing purposes. Such use of a domain name to perpetrate fraud is manifestly in bad faith.

The Panel therefore concludes that the Domain Names were registered and are being used in bad faith.

Based on the available record, the Panel finds the third element of the Policy has been established.

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 Domain Names <milestoneapply.cards>, <mymileestonecard.com>, <mymileestonecard.cc>, <mymileestonecard.net>, and <mymileestonecard.org> be transferred to the Complainant.

/Karen Fong/

Karen Fong

Sole Panelist

Date: October 19, 2026