

ADMINISTRATIVE PANEL DECISION

Arata AI Inc. v. Arata, LLC, Peng Bo, SAHO Inc.
Case No. DAI2026-0077

1. The Parties

The Complainant is Arata AI Inc., United States of America ("United States"), represented by Montgomery McCracken Walker & Rhoads LLP, United States.

The Respondents are Arata, LLC, United States, Peng Bo, Japan, and SAHO Inc., Japan.

2. The Domain Name and Registrar

The disputed domain name <arata.ai> is registered with CloudFlare, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 7, 2026. On August 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 7, 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 (Arata, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 14, 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 August 24, 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 Respondents of the Complaint, and the proceedings commenced on August 26, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 15, 2026. On August 27, 2026, the Respondents requested an additional four (4) calendar days within which to submit the Response. On August 28, 2026, the Center granted the automatic four calendar day extension for response under paragraph 5(b) of the Rules, the new due date for Response was September 19, 2026. The Response was filed with the Center on September 18, 2026.

The Center appointed Pablo A. Palazzi as the sole panelist in this matter on September 25, 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 September 29, 2026, the Complainant submitted an unsolicited Supplemental Filing. On October 1 and 3, 2026, the Respondents filed a Reply to the Complainant's Supplemental Filing.

4. Factual Background

The Complainant is a Delaware corporation incorporated on March 20, 2025, with its principal place of business in the United States. The Complainant develops and provides artificial-intelligence software and software-as-a-service (SaaS) solutions for technical bid evaluation and related AI consulting services.

The Complainant owns United States Trademark Registration No. 8,209,900 for the standard-character mark ARATA AI, filed March 30, 2025 and registered on April 14, 2026, in International Classes 9 and 42 for artificial-intelligence software and software-as-a-service for technical bid evaluation, and for related AI consulting services. The Complainant states that it has used the ARATA AI mark in commerce since at least March 13, 2025, and its website at "www.arataai.com" has been online since at least January 2025.

The Respondents are (i) Arata, LLC, a Delaware limited liability company formed on April 30, 2025; (ii) Peng Bo, an individual with address at Osaka, Japan; and (iii) SAHO Inc., a Japanese company with address at the same Osaka location as Peng Bo.

The disputed domain name was created on April 7, 2024. At the time the Complaint was filed, the disputed domain name resolved to a website presenting Arata LLC as an "AI software company" that built software for intelligent automation, applied AI systems, and practical developer workflows.

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.

The Complainant owns United States Trademark Registration No. 8,209,900 for the standard-character mark ARATA AI. The disputed domain name is identical to this mark.

The Complainant has not licensed or authorized the Respondents to use its mark. The Respondents hold no United States trademark registration or application for ARATA AI or ARATA.

In an email dated July 5, 2026, the Respondents stated that their software project "has never been commercially released," that it has "never marketed any commercial product under the 'Arata AI' name," and that it "decided to adopt a different product name for our future platform." The Complainant argues that an unreleased private project is not a bona fide offering of goods or services. The Respondents also said that the project's development "has been documented in our GitHub repository," but it has not produced that repository or any dated records. As a result, there is no evidence of demonstrable preparations made before notice of the dispute.

The Complainant argues that the Respondents are not commonly known by the disputed domain name since Arata, LLC was formed on April 30, 2025. This was after the Complainant's first use of the mark (March 13, 2025), its incorporation (March 20, 2025), and the filing of its United States application (March 30, 2025).

From at least late March 2025 until after notice, the disputed domain name resolved to a waitlist page headed “Arata.AI — Your AI-Powered Collaborative Workspace.” The page described an AI application marked “In Development” and invited visitors to “Join Waitlist.” This falls within the Complainant’s field. After receiving notice, the Respondents removed the “Arata AI” branding. The site now presents Arata LLC as an “AI software company.” The Respondents’ affiliate SAHO Inc. had hosted the same waitlist content, and it now promotes the same product under the name “Orythos,” and “Coming in 2027.” The Complainant argues that these post-notice changes do not create rights or legitimate interests.

The disputed domain name was created on April 7, 2024. Nothing in the record connects the Respondents to that registration, and Arata, LLC did not exist at the time. The .ai registry’s RDAP record reflects a registrar transfer on July 13, 2025, and a last changed date of July 19, 2025. Historical WhoIs records shows Arata, LLC of Newark, Delaware as the registrant by October 2, 2025. The earliest link between the Respondents and the disputed domain name is an archived capture dated March 27, 2025, showing the SAHO Inc. waitlist page.

On any of these dates, the acquisition postdates the Complainant’s rights. Under [WIPO Overview 3.0](#), section 3.9, a transfer is treated as a new registration.

In response to the Complainant’s USD 2,000 offer, the Respondents demanded USD 30,000. This exceeds any out-of-pocket costs, and the Respondents based the figure in part on the “strategic value of the domain.” The Respondents also stated that any payment would “constitute the commercial acquisition of a legitimately held digital asset” and “should not be interpreted as a settlement.” The Complainant argues that this is bad faith under paragraph 4(b)(i) of the Policy, citing [WIPO Overview 3.0](#)¹, sections 3.1.1 and 3.10, and *World Wrestling Federation Entertainment, Inc. v. Michael Bosman*, WIPO Case No. [D1999-0001](#).

Before notice, the Respondents used the disputed domain name to promote a planned competing AI product, which created a likelihood of confusion under paragraph 4(b)(iv) of the Policy. According to a witness Declaration attached to the Complaint, there has been actual confusion. Prospective customers and job candidates referred to the Complainant by the disputed domain name and listed the Respondents’ address as the Complainant’s.

The Respondents continue to hold the disputed domain name and to operate an AI software website there, despite admitting it abandoned the product name. The Complainant argues that this, together with the monetary demands and the post-notice rebranding, constitutes ongoing bad faith use.

On July 8, 2026, the Complainant sent a cease-and-desist letter. The letter rejected the USD 30,000 demand and offered USD 2,000 for transfer of the disputed domain name and an undertaking to cease use of “Arata AI.” A follow-up on July 15, 2026 set a deadline of July 18, 2026. The Respondents did not reply to either communication. On June 4, 2026, two weeks after the Complainant’s May 21, 2026 demand, the RDAP record was modified. It now redacts the registrant’s identity and shows only a location in Osaka, Japan.

The Respondents asserted that the disputed domain name “was registered on April 7, 2024 as part of our own independent software project, well before your company acquired any trademark rights.” The Complainant argues that this assertion fails for two reasons: (i) no evidence links the Respondents to the disputed domain name before March 27, 2025. That date is itself after the Complainant’s first use and incorporation and (ii) the Respondents’ later conduct shows an intent to profit from the Complainant’s mark under paragraphs 4(b)(i) and 4(b)(iv). This conduct includes the competing “Arata AI” page, the USD 30,000 demand, and abandoning the name once challenged.

¹ The Panel notes that the Complaint cites the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”), rather than the current WIPO Overview of WIPO Panel Views on Select UDRP Questions, Version 3.1 (“[WIPO Overview 3.1](#)”). The Panel has therefore left those references as cited by the Complainant.

B. Respondents

The Respondents contend that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name.

Registration and control of the disputed domain name.

The Respondent Peng Bo registered the disputed domain name on April 7, 2024, through the registrar Dynadot. Dynadot order No. 15247049 records a two-year registration of the disputed domain name for USD 135.78. Apple receipts dated March 2024, June 2025, and February 2026, associate the email address “mega.mind@[...]” with Peng Bo and his Osaka billing address. Mercury records further associate the same email address with Peng Bo’s administration of Arata, LLC’s business banking account.

On June 2, 2025, Mercury emailed “mega.mind@[...]” confirming activation of, and full access to, Arata, LLC’s business banking account. Mercury’s May 31, 2025 card notice names Peng Bo and his Osaka address.

On July 27, 2024, Cloudflare confirmed that the disputed domain name was active on its nameservers. Email routing records show that, from that date, mail sent to “[...]@arata.ai” was forwarded to “arata.ai.inc@[...]”. Cloudflare logs separately record certificate deployment on March 20, 2025, and website configuration on March 27, 2025. In July 2025, the disputed domain name was transferred from Dynadot to Cloudflare Registrar through the Cloudflare account associated with “bo.peng@[...]”.

On April 15, 2024, Peng Bo applied in Japan to register the trademark ARATA.AI in Classes 9 and 42 (Application No. 2024-40039). The application was published on April 23, 2024. On December 25, 2024, an opinion in the examination file linked ARATA.AI to AI application software and referred to “the website arata.ai.” The Respondents argue that this predates the Complainant’s first use, incorporation, and application. A further opinion of March 2025 describes services under development. Peng Bo states that its references to “our company” mean SAHO. The application was refused on August 22, 2025, because the services were unclear and because of an earlier Japanese registration.

The Respondent, Peng Bo, initially formed Arata AI LLC in Wyoming on November 14, 2024, as its sole member. That company was then dissolved on January 30, 2025. On April 30, 2025, he formed Arata, LLC in Delaware, wholly owned and controlled by him, to continue the same project.

The Respondent Peng Bo states that he first learned of the Complainant through its email of May 21, 2026.

There is also evidence of software development: the GitHub records show certain commits² dated January 8, 2025; January 9, 2025; and of March 21, 2026, titled “feat: implement PLAN-008 arata-storage PostgreSQL backend”. The Respondents argue that these show a project in continuous development before notice.

The Complainant’s Annexes 5 and 6 show the project website. On March 27, 2025, the site presented an AI collaborative workspace marked “In Development,” with a waitlist. On May 15, 2026, six days before the Complainant’s first notice, the project website was still online.

All of the Complainant’s relevant dates postdate both the registration of the disputed domain name (April 7, 2024) and the Japanese application.

² A “commit” is a record created on the GitHub platform each time a user saves changes to the files of a software repository. Each commit bears a unique identifier and records the changes made, the author’s name and email address, a date and time, and an optional descriptive message, so that a repository’s commit history serves as a chronological log of the development of the code.

The Respondents argue that similarity between the mark and the disputed domain name does not change this chronology. Nor does it, by itself, negate their legitimate interests or prove bad faith registration.

The trademark filings, company records, development records, and website captures show demonstrable preparations to use the disputed domain name before notice. Under paragraph 4(c)(i) of the Policy, such preparations do not require a commercial launch ([WIPO Overview 3.1](#), section 2.2).

The Respondents also argue that: (i) the statement about commercial release in the July 5, 2026 email does not negate those preparations; (ii) the Delaware formation date does not mark the start of the project; and (iii) their interests do not depend on authorization from the Complainant.

The Respondents have not abandoned the project; they have only chosen a new product name for it. The disputed domain name continues to host Arata, LLC's corporate website.

C. Complainant unsolicited Supplemental Filing

On September 29, 2026, the Complainant submitted an unsolicited Supplemental Filing. It argued that the filing was warranted because the Response relied on evidence in the Respondents' exclusive possession, disclosed for the first time on September 19, 2026, and because the Response requested a finding of Reverse Domain Name Hijacking.

The Complainant maintains its request for transfer. It challenges the Respondents' evidence of continuous holding since April 7, 2024, relying on *HIGHLEVEL Inc. v. Domain Administrator, Weedmaps, Ghost Management Group, Inc.*, WIPO Case No. [D2025-2991](#), and *Certipost NV v. Virtual Point Inc.*, WIPO Case No. [D2008-1183](#). In particular, it points to:

- the absence of any document transferring the disputed domain name among Peng Bo, SAHO and Arata, LLC;
- the self-set dates of the GitHub commits;
- the inconsistency between the December 2024 Japanese filing and the absence of any website before March 27, 2025;
- the Respondents' own changes to the registrant of record in July 2025 and June 2026, which, it says, made the disputed domain name appear to be a recent acquisition.

The Complainant corrects two statements in the Amended Complaint. It acknowledges the existence of the Respondent's Japanese trademark application, and it withdraws the description of the USD 30,000 demand as "escalating."

The Complainant invokes attorney-client privilege over the internal communications of July 5 and 6, 2026 between the Complainant and its counsel. It says these were inadvertently included in Annex 8, withdraws them, tenders a substituted annex (Annex 15) supported by a declaration of counsel (Annex 16), and asks the Panel to disregard them. ³

³Under paragraph 10(d) of the Rules, the Panel determines the admissibility, relevance, materiality and weight of the evidence. Under paragraphs 10(a) and 10(b), the Panel conducts the proceeding as it considers appropriate, ensuring that the parties are treated with equality. The Panel is satisfied, for the purposes of this proceeding, that the pages at issue were confidential legal communications and were disclosed by mistake, not as a deliberate waiver of privilege, and that fairness supports excluding them from consideration. The Panel therefore excludes from the record the privileged pages of Annex 8 involving only email communications between complainant and its counsel, as filed with both the Complaint and the Amended Complaint, and has not taken them into account in reaching its decision.

On Reverse Domain Name Hijacking, the Complainant argues that the Complaint was brought in good faith, for three reasons:

- The public record showed a July 2025 transfer to a company formed in April 2025, which it treated as a new registration under section 3.9 of the WIPO Overview.
- The Respondents did not produce the supporting records despite the request in the cease-and-desist letter. On a comparable record, the panel in *HIGHLEVEL Inc. v. Domain Administrator, Weedmaps, Ghost Management Group, Inc.*, WIPO Case No. [D2025-2991](#), declined to find Reverse Domain Name Hijacking, and the panel in *Skillful Communications, Inc. v. Redacted for Privacy, Aquent / Aquent Aquent, Aquent*, WIPO Case No. [D2022-0910](#), made no such finding.
- Its USD 2,000 offers were a legitimate attempt to settle.

Finally, the Complainant explains that the “arata.ai/research” reference on its website was an erroneous address that has since been removed (Annex 17), and submits a consolidated chronology of the parties’ annexes (Annex 18).

D. Respondents’ unsolicited Reply to the Complainant’s Supplemental Filing

On October 1, 2026, the Respondents objected to the Complainant’s supplemental submission being used to revisit the merits of the case and introduce new adverse allegations. The Respondents maintained their Response and RDNH request, emphasized the Complainant’s concessions regarding the Japanese trademark application and the USD 30,000 offer, disputed the inferences drawn from the registration history and technical records of the disputed domain name, and requested leave to submit a limited supplemental reply addressing the new allegations, the RDNH issues, and the matters concerning Annex 8, without extending the Panel’s decision deadline.

On October 3, 2026, the Respondents filed a Reply to the Complainant’s Supplemental Filing, with Annexes R10 to R13. They maintain that the disputed domain name has been in Peng Bo’s continuous possession since his acquisition on April 7, 2024. In support, they submit:

- SAHO’s 2022 founding articles and its current registry certificate, which identify Peng Bo as sole member;
- records showing that the July 2025 registrar transfer and the account changes took place within his control, not through an acquisition from an independent owner.

They also distinguish *HIGHLEVEL Inc. v. Domain Administrator, Weedmaps, Ghost Management Group, Inc.*, WIPO Case No. [D2025-2991](#), and *Certipost NV v. Virtual Point Inc.*, WIPO Case No. [D2008-1183](#). Against the challenge to the GitHub dates, they rely on evidence they say cannot be backdated:

- server-generated GitHub repository timestamps of January 2025;
- an App Store Connect record created by January 1, 2025, with the SKU “ai.arata.app”;
- email use of the disputed domain name, including Stripe Atlas emails of December 2024 and a Microsoft developer-account notice of July 2025.

With respect to Reverse Domain Name Hijacking, the Respondents argue that the Complainant knew before filing of Peng Bo’s 2024 registration and his project. They also argue that the Complainant’s corrections, namely the existence of the Japanese application and the withdrawal of the “escalating” demand allegation, do not cure the original misstatements. Relying on *Rocket Lab USA, Inc. v. RocketLab Inc.*, Forum Claim No. FA2303002036243, they contend that the July 8, 2026 letter used the threat of UDRP and federal litigation to pressure Peng Bo into accepting USD 2,000. They further argue that the Complainant’s attribution of research to “arata.ai/research” created a misleading association with the disputed domain name.

On Annex 8, the Respondents stated that the Panel should decide whether to exclude the internal communications. If excluded, the Complainant's own interpretation of them should be disregarded as well.

6. Discussion and Findings

6.1. Supplemental Filings

On 29 September 2026, the Complainant filed an unsolicited Supplemental Filing.

On 1 and 3 October 2026, the Respondents filed an unsolicited Reply to that Supplemental Filing, together with further annexes.

Neither the Policy nor the Rules expressly provide for unsolicited supplemental filings. Under paragraphs 10 and 12 of the Rules, the Panel has discretion to accept or reject them, bearing in mind the need for procedural efficiency and fairness to both Parties. A party submitting such a filing should show its relevance and explain why it could not have provided that material in the Complaint or Response. [WIPO Overview 3.1](#), section 4.6.

Where a respondent requests a finding of Reverse Domain Name Hijacking, panels have generally allowed the complainant an opportunity to respond to that request. The Panel therefore admits the Complainant's Supplemental Filing. The Complainant's Supplemental Filing raised new challenges, among others concerning the ownership of SAHO Inc., the authenticity of the software-development evidence, and the Japanese trademark file. It also made some corrections. Having admitted it, the Panel considers that fairness requires giving the Respondents an opportunity to answer those challenges. The Panel therefore accepts the Respondents' Reply and its supporting annexes.

The Panel has taken both supplemental filings into account only insofar as they address new matters, and has given no weight to those parts that merely repeat or expand arguments already presented. The Panel considers that no further submissions are necessary to reach its 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 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 that the disputed domain name is identical to the Complainant's mark for purposes of the Policy. [WIPO Overview 3.1](#), sections 1.7 and 1.11.3.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Given the Panel's finding on the third element, it is not necessary to analyze this element of the Complaint.

C. Registered and Used in Bad Faith

Paragraph 4(a)(iii) of the Policy requires the Complainant to establish both registration and use in bad faith. Because the Respondents did not register the disputed domain name in bad faith, the Panel need not decide whether it has since been used in bad faith.

The Complainant's central contention is that the Respondents only acquired the disputed domain name upon its transfer from Dynadot to Cloudflare on July 13, 2025, after the Complainant's trademark rights had accrued, and that such transfer should be treated as a new registration for the purposes of the Policy. The Panel does not agree.

While the transfer of a domain name to an unrelated third party is generally treated as a new registration, panels have recognized that changes in the registration details do not have that effect where the respondent shows an unbroken chain of possession, as is often the case with movements within the same corporate control group made for legitimate business reasons and not to evade the Policy. [WIPO Overview 3.1](#), section 3.9; and *HIGHLEVEL Inc. v. Domain Administrator, Weedmaps, Ghost Management Group, Inc.*, WIPO Case No. [D2025-2991](#).

Here, the record shows that the disputed domain name has at all times remained under the control of the same person, Mr. Peng Bo. It was registered on April 7, 2024 through a Dynadot account linked to SAHO Inc., a company wholly owned and controlled by him. By July 2024, nearly a year before the registrar change, his Cloudflare account (linked to an email at "bo.peng@[...]") was already managing the disputed domain name's DNS and email routing. The July 2025 registrar change thus did not involve any transfer to a third party, but merely a change of registrar under the same continuous control. Likewise, the successive registrant entries, whether in Mr. Peng Bo's personal name or in that of SAHO Inc. or Arata, LLC, all reflect entities owned and controlled by him.

The Panel is of the view that a domain name holder is free to hold a domain name personally or through companies under its control, and this appears to be what Mr. Peng Bo did. The Panel acknowledges that the Respondents have not fully explained the rationale for the several changes in corporate vehicles and registration details in the WhoIs of the disputed domain name over a period of roughly two years, including the formation and dissolution of a Wyoming entity within a few months. These changes are, however, corroborated by the evidence on record. They are also consistent with the "Arata.AI" project the Respondents documented well before the Complainant's rights arose, notably through Mr. Peng Bo's Japanese trademark application for ARATA.AI filed on April 15, 2024, eight days after the registration of the disputed domain name. That application was ultimately refused, but this does not detract from its value as contemporaneous evidence of the Respondents' plans.

There is no evidence that any of these changes was intended to mask a change of control, to obtain the benefit of an earlier registration date, or to take advantage of the Complainant's mark. Indeed, in *HIGHLEVEL Inc. v. Domain Administrator, Weedmaps, Ghost Management Group, Inc.*, WIPO Case No. [D2025-2991](#), the panel found an unbroken chain of possession even though the domain name had passed from an individual to an affiliated company on an imprecise date. In the present case, the disputed domain name was always under the control of Peng Bo, as no transfer to a different holder has been shown at all. Accordingly, the Panel considers April 7, 2024 to be the relevant date for assessing the Respondents' registration of the disputed domain name, which predates the Complainant's claimed first use of its mark on March 13, 2025.

When the disputed domain name was registered, the Complainant did not exist, held no registered or unregistered rights in ARATA AI, and had not used the name in commerce. Therefore, there was no bad faith at the time of registration because the Respondents could not have targeted a company or a mark that had not yet come into being.

In addition, the record does not suggest that the Respondents registered the disputed domain name to anticipate and take advantage of nascent rights of the Complainant. [WIPO Overview 3.1](#), section 3.8.2. There is no evidence of any relationship between the parties, of insider knowledge, or of publicity about the Complainant's plans before April 2024. On the contrary, the evidence points to an independent adoption of the name for the Respondents' own project.

In fact, on April 15, 2024, only a week after registering the disputed domain name, Mr. Peng filed Japanese Trademark Application No. 2024-40039 for ARATA.AI in Classes 9 and 42. In his opinion of December 25, 2024, filed in the course of the Japanese examination, he noted the sign was associated with an AI application software and with the website at the disputed domain name.

The Panel considers that this filing with the Japanese trademark application is contemporaneous evidence supporting the Respondents' good faith. It also shows a clear intention, from the outset, to develop a project under the ARATA.AI name, even though that project did not, for other reasons, lead to a product launched under that name.

The Panel has also considered the Respondents' offer of July 5, 2026 to transfer to the Complainant the disputed domain name for USD 30,000. Mr. Peng named that figure only in reply to the Complainant's unsolicited approaches of May 21, June 3, and June 12, 2026, each of which offered USD 2,000. There is no evidence that the disputed domain name was offered for sale to the public, or to the Complainant, before that exchange. A price named in response to a purchase approach, more than two years after a good-faith registration, does not show that the disputed domain name was registered primarily for the purpose of selling it within the meaning of paragraph 4(b)(i) of the Policy. In any event, the Respondents could not have had the Complainant in mind when the disputed domain name was registered on April 7, 2024. At that date the Complainant did not yet exist and held no trademark rights, as it was incorporated on March 20, 2025 and first used its mark on March 13, 2025. [WIPO Overview 3.1](#), section 3.8.1.

Nor does the Respondent's statement that it decided to adopt a different name for its future platform, now promoted by SAHO Inc. as "Orythos," support a finding against the Respondent. A decision to market a product under another brand does not mean, and does not allow the interference, that the Respondent has suddenly started to act in bad faith after registering the disputed domain name in good faith. A registrant's choice of commercial branding for a given product is a business decision that does not, by itself, affect its rights in a domain name registered and prepared for use in good faith before the Complainant existed. That choice was moreover made after the Complainant's demands, and a registrant's reasonable response to a threatened dispute cannot be turned against him.

The Panel finds that the Respondents did not register the disputed domain name in bad faith targeting the Complainant or its trademark rights because the Complainant had no trademark rights at the time that the Respondents registered the disputed domain name. [WIPO Overview 3.1](#), section 3.8.1.

The Panel finds the third element of the Policy has not been established.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.1](#), section 4.16.

Panels have found RDNH, among other circumstances, where:

- facts which demonstrate that the complainant knew it could not succeed as to any of the required three elements – such as the complainant's lack of relevant trademark rights, clear knowledge of respondent rights

or legitimate interests, or clear knowledge of a lack of respondent bad faith (see generally section 3.8) such as registration of the disputed domain name well before the complainant acquired trademark rights;

- the provision of false evidence, or otherwise attempting to mislead the panel;
- the provision of intentionally incomplete material evidence – often clarified by the respondent;
- filing the complaint after an unsuccessful attempt to acquire the disputed domain name from the respondent without a plausible legal basis. [WIPO Overview 3.1](#), section 4.16.

In addition, some UDRP panels have also held parties represented by counsel to a higher standard. [WIPO Overview 3.1](#), section 4.16.

The Respondents have requested a finding of RDNH. In assessing whether the Complaint was brought in bad faith, the Panel has taken into account several circumstances that weigh in the Complainant's favour.

First, Mr. Peng's email of July 5, 2026 asserted that the disputed domain name had been registered on April 7, 2024 in connection with an independent project, but it was not accompanied by any supporting information that would have allowed the Complainant to verify that he had been the holder of the disputed domain name since that date or hyperlinks to the software repository dated records. In its letter of July 8, 2026, the Complainant's counsel set out the Complainant's account of the facts and asked the Respondents to produce evidence and records. The Respondents did not reply. The documents establishing the chain of possession, namely the Dynadot order, the account records, and the corporate documents, were produced for the first time with the Response in this proceeding.

Second, in its Supplemental Filing the Complainant showed a certain degree of candor. It corrected its earlier statements, acknowledging the Respondents' Japanese trademark application for ARATA.AI and withdrawing its characterisation of the Respondents' monetary demands as "escalating", since the Respondent made only one proposal of USD 30,000. The Panel considers that these corrections reflect an effort by the Complainant's counsel to ensure that the record accurately reflects the facts, and that this weighs against a finding of Reverse Domain Name Hijacking.

The Panel considers this to be a borderline case. Several other circumstances however weigh in favor of the Respondents' request. The Complainant was represented by counsel, from whom a greater understanding of the Policy and its limits may be expected. The creation date of the disputed domain name, April 7, 2024, was publicly available and predated the Complainant's claimed first use of its mark by almost a year. Mr. Peng Bo's Japanese trademark application for ARATA.AI had been published in April 2024 (although not informed to the Complainant in the email exchange). Before the Complaint was filed, the Respondents had informed the Complainant that the disputed domain name was connected to an independent development project.

Nonetheless, after weighing all the circumstances, the Panel declines to make a finding of RDNH. In *HIGHLEVEL Inc. v. Domain Administrator, Weedmaps, Ghost Management Group, Inc*, WIPO Case No. [D2025-2991](#), the complaint failed because the respondent established an unbroken chain of possession dating back to before the complainant's trademark rights. The panel in that case nevertheless declined to find RDNH. It reasoned that the complainant had no way of knowing the respondent's original acquisition date, or the steps the respondent had taken towards a bona fide use, absent an affirmative reply from the respondent. It also noted that certain evidentiary inconsistencies remained unresolved even after further submissions.

Similar considerations apply here, albeit to a lesser degree. While the creation date of the disputed domain name was public, the record available to the Complainant when it filed the Complaint pointed to a succession of changes that could reasonably raise doubts as to whether the disputed domain name had remained in the same hands. In particular, the registrar transfer in July 2025 occurred after the Complainant's rights had accrued. The registrant of record changed from SAHO Inc. to Arata, LLC, a company formed after the Complainant's claimed first use, and later reverted to SAHO Inc. A Wyoming entity bearing the "Arata AI" name was formed and dissolved within a few months. The registrant's identity was redacted from the public RDAP record shortly after the Complainant's first demands. The Respondents' pre-Complaint

correspondence did not explain the chain of possession. It instead stated that the Respondents had abandoned the “Arata AI” name for their future platform and proposed transferring the disputed domain name for USD 30,000. The evidence that ultimately established the Respondents’ continuous control consists largely of private account records, internal registrar and DNS-provider data, and Japanese corporate documents. That evidence was produced only with the Response and, in part, with the Respondents’ Supplemental Filing. The Panel further notes that the Complainant has submitted evidence of instances of actual confusion between the Parties, which suggests that it was pursuing what it perceived to be a genuine grievance rather than acting primarily to harass the Respondents.

In these circumstances, although the Complainant would have been well advised to scrutinize more closely the registration history of the disputed domain name via available online tools and the information the Respondents had provided before filing, the Panel is not persuaded that the Complainant knew, or clearly should have known, that it could not succeed under the Policy. On balance, therefore, the Panel finds that the Complaint was not brought in bad faith and does not constitute an abuse of the administrative proceeding.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Pablo A. Palazzi/

Pablo A. Palazzi

Sole Panelist

Date: October 15, 2026