

## **ADMINISTRATIVE PANEL DECISION**

Keeta, Inc. v. ali farahani, yakuza inc  
Case No. DIO2025-0022

### **1. The Parties**

The Complainant is Keeta, Inc., United States of America (“United States”), represented Envision IP, United States.

The Respondent is ali farahani, yakuza inc, United States.

### **2. The Domain Name and Registrar**

The disputed domain name <keetard.io> is registered with NameCheap, Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 13, 2025. On June 13, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 13, 2025, 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, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 16, 2025, 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 the same day.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the .IO Domain Name Dispute Resolution Policy (the “Policy”), the Rules for .IO Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for .IO 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 17, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 7, 2025. The Respondent sent an informal email to the Center on June 18, 2025. The Center notified the Parties about the commencement of Panel Appointment Process on July 8, 2025.

The Center appointed W. Scott Blackmer as the sole panelist in this matter on July 10, 2025. 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 is a corporation established under the laws of the State of Delaware and headquartered in Santa Monica, California, United States. In 2023, the Complainant launched a blockchain-based consumer app and institutional API (software interface) to facilitate high-speed, cross-border asset transfers between the United States, Canada, Mexico, Brazil, the United Kingdom, and the European Union, accommodating fiat and digital currencies. The Complainant operates a website at “www.keeta.com”. The transfer network has expanded rapidly and attracted media attention, and the Complainant now has trademark protection through the Madrid Protocol in 72 countries.

The Complainant holds relevant trademark registrations for the KEETA word mark, including the following:

Mark	Jurisdiction	Registration No.	Registration Date	Goods or Services
KEETA (word)	International Trademark (multiple designations)	1738181	January 4, 2024	IC 36
KEETA (word)	International Trademark (multiple designations)	1738182	April 1, 2024	IC 9
KEETA (word)	European Union	018899178	February 10, 2024	IC 36, 42
KEETA (word)	United Kingdom	UK00003932009	January 24, 2025	IC 9, 36, 42

The disputed domain name was created on June 11, 2025, and is registered to the Respondent “ali farahani”, listing his job title as “project manager” and his organization as “yakuza inc.”, with a postal address in the State of California, United States, and giving a Gmail contact email address.

The disputed domain name is not associated with an active website at the time of this Decision, but the record includes a screen capture, similar to those found by the Internet Archive’s Wayback Machine, showing that in June 2025 the disputed domain name resolved to a website (the “former website”) with a logo and moving graphics similar to those found on the Complainant’s website. These promoted “Keeta” as the blockchain that “connects all networks”, with symbols including a dollar sign and a Bitcoin emblem, ending in the tagline, “Experience Keeta”. However, the landing page of the former website also was headed in smaller font with the line, “Keetard | We promise it works”, and that slogan was repeated on another screen over the legend, “This is not a scam network”. That page included links to a third-party website, “www.dexscreener.com”, that serves as an exchange for cryptocurrency tokens, showing values for the Ethereum-based Keetard token.

#### 5. Parties’ Contentions

##### A. Complainant

The Complainant asserts that the disputed domain name is “confusingly similar to the Complainant’s registered and widely used KEETA trademark,” adding “the derogatory and offensive suffix “rd”. The Complainant argues that the suffix “tard” (as in the offensive term “retard”) is a “recognized slur” but does not avoid confusing similarity for Policy purposes, because the disputed domain name is phonetically and aurally

similar to the Complainant's distinctive mark. The Complainant contends that the Respondent has no permission to use the mark, is not known by a corresponding name, and has not used the disputed domain name for a bona fide commercial offering or legitimate noncommercial fair use, including parody, as the former website emulated the Complainant's logo and graphics and then linked to a cryptocurrency exchange site. The Complainant cites these facts as well in arguing for a finding of bad faith, suggesting that the Respondent intended to mislead Internet users for commercial gain and to damage a competitor.

## **B. Respondent**

The Respondent did not file a formal response. The Respondent's email to the Center stated, in relevant part,

"I'm a freelance web developer. ... I was hired to register this domain and do the technical work – I have no control over or connection to the content, marketing, or branding associated with it. ... I had no knowledge of Keeta, Inc. ... As soon as I became aware of this complaint, I took the necessary steps to take the domain down. I'm happy to sell the domain directly to Keeta, Inc. if they would like to acquire it."

## **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 Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.<sup>1</sup>

The Complainant has shown rights in respect of a trademark or service mark (the registered) KEETA word mark) for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the mark is reproduced within the disputed domain name. The mark remains recognizable within the disputed domain name with the addition of the letters "rd" as a suffix, as it is visually and aurally similar. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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 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

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<sup>1</sup>Taking into consideration many similarities between the .IO Policy and the Uniform Domain Name Dispute Resolution Policy ("UDRP"), the Panel has taken note of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)") and, where appropriate, will decide consistent with the consensus views captured therein.

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 3.0](#), 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. In fact, the Respondent denies any rights or interests in the disputed domain name, claiming only to have registered the disputed domain name on behalf of an unnamed principal. A perusal of the former website shows that it emulated the Complainant's logo and graphics and linked to a commercial, third-party website dealing in cryptocurrencies. This indicates an illegitimate exploitation of the Complainant's trademark rather than either a bona fide commercial offering or a legitimate fair use within the meaning of the Policy, paragraphs 4(c)(i) or (iii).

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

### **C. Registered or Used in Bad Faith**

The Policy requires a showing of bad faith in either the registration or use of the disputed domain name. The Respondent in his (uncertified) email to the Center denies prior awareness of the Complainant and states that he registered the disputed domain name only at the behest of his unnamed client, with no control over the content of the former website. Nevertheless, the Respondent took down the website and offers to sell the disputed domain name to the Complainant, so the Respondent, who is the registrant of record, seems to believe he may exert control over the disputed domain name. And under the terms of the registration agreement, he remains responsible for the use of the disputed domain name in a manner that does not interfere with the rights of others.

In this case, the use of the disputed domain name clearly exploits the Complainant's registered trademark. The disputed domain name itself is confusingly similar, misleading Internet users, with a link from the former website to an exchange site dealing in a similarly named cryptocurrency. This accords with the example of bad faith given in the Policy, paragraph 4(b)(iv), whether or not the Respondent was himself a competitor of the Complainant. Moreover, the appearance of the former website, featuring a logo, graphics, and text similar to the Complainant's website, clearly emulated the Complainant's website and appears designed to further the confusion as to source or affiliation. If the disputed domain name was meant as parody, there is little if any satirical content on the former website, and the third-party commercial link tends to undermine any claim to a legitimate fair-use defense.

The Panel finds that the third element of the Policy has been established on this record.

### **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 <keetard.io> be transferred to the Complainant.

*/W. Scott Blackmer/*

**W. Scott Blackmer**

Sole Panelist

Date: July 15, 2025