

## Decision for dispute CAC-UDRP-108246

Case number	<b>CAC-UDRP-108246</b>
Time of filing	<b>2025-12-19 10:58:17</b>
Domain names	<b>paysend-au.com, pay-send-au.com, paysend-auth.com, paysend-customer7262.com, paysend-australia.com , paysend-transfer.com, pay-send-australia.com, paysend-customer2754.com, pay-send-order.com, pay-send-transfer.com</b>

### Case administrator

Name	<b>Olga Dvořáková (Case admin)</b>
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### Complainant

Organization	<b>PaySend Group Limited</b>
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### Complainant representative

Organization	<b>Motsnyi IP Group (dba Motsnyi Legal)</b>
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### Respondents

Name	<b>jiowemk ekowe ko eoweokw ekowe ko eoweokw jiowemk</b>
Name	<b>Egor Andreevich Fomin</b>
Name	<b>Ifoss Fiero Fiero Ifoss</b>
Name	<b>fef fjnefkj efjkefef fjnefkj ejkefef fef</b>

### OTHER LEGAL PROCEEDINGS

The Panel is not aware of any other legal proceedings which are pending or decided and which relate to the disputed domain names.

### IDENTIFICATION OF RIGHTS

PaySend Group Limited (the "Complainant" or "Paysend") is the owner of the international trademark registrations incorporating the "Paysend" word element: "PAYSEND" (Reg. No. 1251936), registered on April 10, 2015, in class 36; "PAYSEND" (Reg. No. 1284999), registered on October 13, 2015, in classes 9 and 36; "PAYSEND Money for the future" (Reg. No. 1539382), registered on May 30, 2020, in classes 9 and 36; etc.

### FACTUAL BACKGROUND

The Complainant is a global FinTech company on a mission to change how money is moved around the world. Paysend was the first FinTech project to introduce international card-to-card transfers, allowing connections between 12 billion cards globally - Mastercard, Visa, China UnionPay and local card schemes. Since the Complainant's business started in 2017 it has launched a number of products, including "Paysend Global Account", "Paysend Connect", "Paysend Business" and "Paysend Libre". Paysend currently serves over 10 (ten) MILLION customers and operates in over 170 countries globally. It is one of the leaders in the area of online money transfers and received various awards. The Complainant is headquartered in the UK (with offices in Edinburgh and London) and its group companies (subsidiaries) are located in various countries, including the US, Ireland and Serbia. The Complainant also owns and operates various domain names (both gTLDs and ccTLDs) incorporating its "Paysend" trademark, most notably <paysend.com>.

The disputed domain names were registered on the following dates:

<paysend-au.com> - November 17, 2025;  
<pay-send-au.com> - December 05, 2025;  
<paysend-australia.com> - July 22, 2025;  
<pay-send-australia.com> - November 22, 2025;  
<paysend-transfer.com> - June 28, 2025;  
<pay-send-transfer.com> - December 05, 2025;  
<paysend-auth.com> - October 31, 2025;  
<paysend-customer2754.com> - December 08, 2025;  
<paysend-customer7262.com> - December 08, 2025;  
<pay-send-order.com> - December 08, 2025.

The Complainant's well-known trademark PAYSEND has been used by the Respondent(s) in the disputed domain names resolving to pages that impersonate the Complainant. The Respondent(s) also provided obviously false contact details while registering the disputed domain names. In general, the Respondent(s) used the disputed domain names for illegal activity.

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#### PARTIES CONTENTIONS

The Complainant contends that the requirements of the Policy have been met and that the disputed domain names should be transferred to it. No administratively compliant Response has been filed.

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#### RIGHTS

The Complainant has, to the satisfaction of the Panel, shown the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy).

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#### NO RIGHTS OR LEGITIMATE INTERESTS

The Complainant has, to the satisfaction of the Panel, shown the Respondent(s) to have no rights or legitimate interests in respect of the disputed domain names (within the meaning of paragraph 4(a)(ii) of the Policy).

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#### BAD FAITH

The Complainant has, to the satisfaction of the Panel, shown that the disputed domain names have been registered and are being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy).

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#### PROCEDURAL FACTORS

The first issue in this case is whether the Complaint can be consolidated against the various named Respondents, as requested by the Complainant. The disputed domain names were registered in the names of different individuals.

Paragraphs 10(e) and 3(c) of the Rules provide:

“10(e) A Panel shall decide a request by a Party to consolidate multiple domain name disputes in accordance with the Policy and these Rules.”

“3(c) The complaint may relate to more than one domain name, provided that the domain names are registered by the same domain-name holder.”

These provisions empower the Panel to consolidate multiple domain name disputes in a single decision or for a complainant to file a complaint relating to multiple domain names subject to the requirement that the disputed domain names are registered by the same domain-name holder.

The Complainant argues that the Complaint should be consolidated on the basis that the disputed domain names belong to the same entity/organization, despite being formally registered by different holders. According to the Complainant, the registration data revealed that ten disputed domain names are connected through four differently named registrants and they all imitate the Complainant's trademark. The Complainant argues that all the disputed domain names are actually controlled by the same person because they were registered with the same registrar, within a short period, and follow the same naming pattern. Each disputed domain name resolves to similar impersonation webpages and later to an error page, indicating coordinated use. The registrant information appears false, with fake names, shared postal codes linked to Moscow, and common Cloudflare name servers, suggesting a fraudulent scheme likely operated from Russia. Based on these combined factors, the Complainant requests consolidation of the cases as fair, equitable, and procedurally efficient under the Rules and the Policy.

The Panel is of the view that the following elements cumulatively demonstrate, on balance, that consolidation of all the parties and disputed domain names is possible.

The presented evidence show that the disputed domain names share the following similarities: (a) same TLD of the domain names <.com>; (b) same hosting provider and nameservers (Cloudflare, Inc.); (c) similar impersonation of the Complainant's webpages and later leading to an error page; (d) same pattern of illegal conduct, i.e. using fake registration data.

It is the view of the Panel that the Complainant has sufficiently demonstrated that all the disputed domain names are under common management and control to perform a fraudulent scheme by the same entity likely operated from Russia. None of these statements made in the Complaint or its evidence has been challenged by the Respondents. In conclusion, the Complainant has provided evidence related to the disputed domain names and the connections between them, as outlined above; the Respondent(s) have provided no evidence in response to what was put forward by the Complainant.

The Panel also finds that the consolidation of these disputes would be fair and equitable. It is more procedurally efficient to proceed with a single decision.

The Panel notes that it is not necessary for it to find that the disputed domain names are registered nominally to a single entity or person (see Para. 4.11.2 of WIPO Overview 3.0 and the listed relevant decisions therein). The main issue is whether the Respondent(s) can be treated as a single domain name holder, because they are involved in a common enterprise, and whether it is procedurally fair and efficient to do so. The definition of the “Respondent” under paragraph 1 of the Rules does not exclude the “holder” of the domain name registrations from being a common enterprise, being carried out by multiple individuals (See: *Yahoo! Inc. v. Mahesh Rohatgi / Prakhar Rastogi, Bestwebexperts.com / Prakhar Rastogi, Best Web Experts / Privacy Protection Service INC d/b/a PrivacyProtect.org / Prashant Mishra, Vipra Busines Solution / Rina Rohatgi / Wemo Tech Support / Charu Rohatgi / Alina Jain / Raju Hirani, Alfa Infosystem / Brijesh Pandey, IBS Infosystem / Registration Private, Domains By Proxy, LLC / Amit Singh / Satya Prakash / Rajveer Singh Chawla / Pooja Pandey, Innovative Business Solutions*, [WIPO Case No. D2015-2323](#)).

For all of the named reasons above, the Panel agrees to the consolidation of the Complaint with regard to each of the disputed domain names.

Finally, the Panel is satisfied that all procedural requirements under UDRP were met and there is no other reason why it would be inappropriate to provide a decision.

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#### PRINCIPAL REASONS FOR THE DECISION

The Panel agrees with the Complainant that the disputed domain names (<paysend-au.com>, <pay-send-au.com>, <paysend-australia.com>, <pay-send-australia.com>, <paysend-transfer.com>, <pay-send-transfer.com>, <paysend-auth.com>, <paysend-customer2754.com>, <paysend-customer7262.com>, <pay-send-order.com>) are confusingly similar to the Complainant's trademark PAYSEND. The addition of the generic terms “transfer”, „customer“, „-auth“, “order” or geographical terms (“Australia” or its abbreviation “au”) is not sufficient to escape the finding that the relevant disputed domain names are confusingly similar to the trademark. It does not change the overall impression of the designation as being connected to the Complainant's trademark. The same applies to using the hyphen (“pay-send”) or meaningless digits (“7262”, “2754”). As set forth in section 1.7 of WIPO Overview 3.0, “in cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar to that mark for purposes of UDRP standing.”

The Panel acknowledges that the Complainant presented *prima facie* evidence that the Respondent is not sponsored by or affiliated

with the Complainant in any way. Furthermore, the Complainant has not licensed, authorized or permitted the Respondent(s) to use the Complainant's trademark in any manner, including in domain names. The names of the Respondent(s) do not resemble the disputed domain names in any manner. The Respondents' use of the disputed domain names does not constitute a bona fide offering of goods or services or a legitimate non-commercial or fair use (Policy Para. 4(c)).

Previous UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. Accordingly, the Panel finds that the disputed domain names were registered in bad faith.

Therefore, by using the disputed domain name, the Respondent(s) has(have) intentionally attempted to attract, for commercial gain, Internet users to its(their) website, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of his (their) websites (par. 4(b)(iv) of the Policy). Moreover, the bad faith is additionally illustrated by the facts that the disputed domain names, first, resolved to the websites that impersonate the Complainant, second, the Respondent provided obviously false contact details while registering the disputed domain names, third, the Respondent(s) was(were) using the disputed domain names to perform the illegal activity. In conclusion, the Panel finds that the disputed domain names were used in bad faith.

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FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

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AND THE DISPUTED DOMAIN NAME(S) IS (ARE) TO BE

1. **paysend-au.com**: Transferred
2. **pay-send-au.com**: Transferred
3. **paysend-auth.com**: Transferred
4. **paysend-customer7262.com**: Transferred
5. **paysend-australia.com** : Transferred
6. **paysend-transfer.com**: Transferred
7. **pay-send-australia.com**: Transferred
8. **paysend-customer2754.com**: Transferred
9. **pay-send-order.com**: Transferred
10. **pay-send-transfer.com**: Transferred

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## PANELISTS

Name	<b>Darius Sauliūnas (Preseding panelist)</b>
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DATE OF PANEL DECISION	2026-02-05
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Publish the Decision

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