Decision for dispute CAC-UDRP-108550

Case number	CAC-UDRP-108550
Time of filing	2026-04-03 08:18:20
Domain names	action-paysend.com , paysend-id644-receive.com, paysend-id6255-au.com, pay-send-aus.com , pay-send-id.com

Case administrator

Name	Olga Slanařová (Case admin)

Complainant

Organization	PaySend Group Limited

Complainant representative

Organization	Motsnyi IP Group (dba Motsnyi Legal)

Respondents

Name	jiowemk ekoweko eoweokw ekoweko eoweokw jiowemk
Name	Kiril Avganov Rachitov Avganov Rachitov Kiril

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

The Complainant owns numerous trade mark registrations for its PAYSEND trade mark including International Registration Number1251936 for the PAYSEND word mark which was registered on April 10, 2015 and has subsequently been protected in numerous countries. It also owns International Registration 1735950 for PAYSEND LIBRE registered on February 23, 2023 and which is protected, in particular, in Russia.

FACTUAL BACKGROUND

The Complainant was the first FinTech project to introduce international card-to-card transfers, allowing connections between 12 billion cards globally. 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".

The Complainant currently serves over ten million customers and operates in more than 170 countries. It is headquartered in the UK

(with offices in Edinburgh and London) and its subsidiaries are located in various countries, including the US, Ireland and Serbia. It has a strong social media presence with more than fifty thousand followers and has been recognised as one of the top global money transfer services by various independent sources.

The disputed domain names were registered on the following dates:

<pay-send-aus.com> - January 10, 2026;

<pay-send-id.com> - January 10, 2026;

<paysend-id6255-au.com> - January 17, 2026;

<paysend-id644-receive.com> - January 17, 2026;

<action-paysend.com> - February 23, 2026.

At the time of filing, the disputed domain names each resolve to a webpage that claims to conduct a "verification procedure" and once "verification" is complete, they resolve to error pages. The Complainant's purple "P" logo is displayed in the upper corner of each webpage during the "verification" process.

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.

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).

NO RIGHTS OR LEGITIMATE INTERESTS

The Complainant has, to the satisfaction of the Panel, shown the Respondent 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).

BAD FAITH

The Complainant has, to the satisfaction of the Panel, shown 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).

PROCEDURAL FACTORS

According to the Registrar Verification, the registrants of the disputed domain names are:

- jiowemk ekoweko eoweokw, ekoweko eoweokw jiowemk (domain names <action-paysend.com>, <paysend-id644-receive.com> and <paysend-id6255-au.com>); and
- Kiril Avganov Rachitov Avganov Rachitov Kiril (domain names <pay-send-aus.com> and <pay-send-id.com>).

The Complainant seeks the consolidation of the five complaints into one proceeding and submits that the disputed domain names are registered by the same person and/or are subject to common control and that it would be equitable and procedurally efficient to permit the consolidation. In this regard, the Complainant submits that:

- All five disputed domain names are registered with the same Registrar - "NameSilo" and share the same Name Server records - "Cloudflare" ;
- All five disputed domain names were registered within a relatively short time frame, between January 10, 2026 and February 23, 2026;
- All the disputed domain names are used in a similar fashion in that they all resolve to pages containing an identical "verification" message in English and then they resolve to an error page;
- All the disputed domain names represent a very similar pattern of domain name registration - Complainant's mark, a hyphen

and a descriptive, geographical, or meaningless term;
- The registrants' data is clearly false. In particular, says the Complainant, the Respondent provided false personal details and contact details, including obviously fake names (a number of random characters - "jiowemk ekoweko eoweokw" and "Kiril Avganov Rachitov Avganov Rachitov Kiril" is just a combination of random names) and no proper street names. It also says that the postal code 101000 used in one of the addresses belongs to the Central Post Office of Russia in Moscow or the so-called "Pochtamt" and that all of the addresses are represented as being from Moscow, Russia.

Considering the degree of similarity between the registrars of the disputed domain names, their dates of registration, the manner in which each of the disputed domain names is used and what appears to be false address details based in Russia, the Panel finds that it is more likely than not that each of the disputed domain names were registered by the same person and is subject to common control. In these circumstances, it is equitable and procedurally efficient to permit the consolidation of the cases into these proceedings.

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.

PRINCIPAL REASONS FOR THE DECISION

The Complainant has demonstrated that it owns registered trade marks for its PAYSEND trade mark as set out above. This mark is wholly incorporated into each of the disputed domain names which are accordingly confusingly similar to it. The addition of a hyphen between "pay" and "send" or of terms such as "aus" or "au" as abbreviations for Australia, or of "id" being an abbreviation for "identification", of the common English word "receive", or of a numeral, does not distinguish any of the disputed domain names or prevent a finding of confusing similarity.

The Complainant has submitted that the Respondent is not and has not been known by any of the disputed domain names and is not using and has never used any of the disputed domain names for any legitimate activity or for bona fide offering of goods or services. It has also confirmed that it has not received the Complainant’s authorisation to register and use or conduct business under any of the disputed domain names that include the Complainant’s PAYSEND trade mark. The Complainant has asserted that the disputed domain names resolve to pages that impersonate the Complainant and pretend to be the Complainant by using the Complainant's corporate color (purple) and the Complainant's "P" logo on each page to which the disputed domain names resolve. It has further noted that the Respondent provided obviously false contact details while registering the disputed domain names and that the name of the second named Respondent is just a combination of random names/words. This says the Complainant confirms that the disputed domain names were registered and are being used for fraudulent purposes and that such use cannot create any rights or legitimate interests. It has also noted that all the webpages at the disputed domain names contain the same "verification" message that makes visitors believe they are actually visiting one of the Complainant's websites, namely "Performing security verification". After this verification message all the pages resolve to an error page. It has also noted that the facts of the present dispute are nearly identical to some of the recent UDRP disputes involving the Complainant and its "Paysend" mark, for example case CAC-UDRP-108064 (<paysend-order.com>) and CAC-UDRP-108246 (<paysend-au.com>, et.). It has also noted, as found in previous cases by other panels, that the wholesale incorporation of a trade mark such that it suggests a false affiliation cannot, as in this case, constitute a fair use.

The Panel finds that the Complainant has made out a prima facie case that the Respondent has no rights or legitimate interests in each of the disputed domain names and that this case has not been rebutted by the Respondent. Accordingly, the Panel finds that the Complaint satisfies the second element of the policy in relation to each of the disputed domain names.

The disputed domain names were all registered in January and February 2026 many years after the registration of the Complainant's International Registration Number 1251936 for the PAYSEND word mark. The Complainant's "Paysend" business is very well established internationally and it has a significant Internet and social media presence. Further, the Complainant's PAYSEND LIBRE mark was protected in Russia, where it appears that the Respondent is based, some years prior to the registration of the disputed domain names. In addition, the "security verification" websites to which each of the disputed domain names first resolve contain in the left-hand corner a copy of the Complainant's orange "P" logo. In these circumstances the Panel finds that it is more than likely that the Respondent was well aware of the Complainant's PAYSEND mark and business on the date of registration of each of the disputed domain names.

Under paragraph 4(b)(iv) of the Policy there is evidence of registration and use of the disputed domain name in bad faith where a Respondent has used the disputed domain name to intentionally attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant’s trade marks as to the source, sponsorship, affiliation or endorsement of the website.

In this case the Respondent has used each of the disputed domain names to redirect Internet users to a "security verification" page which, as mentioned above, includes a copy of the Complainant's "P" logo in orange in the left-hand corner. It is apparent from the evidence on the record that the Respondent is using this page to invite Internet users, who incorrectly believe that they are dealing with the Complainant, to enter their name details and credit card information. As the page then resolves to an error page, the overwhelming inference is that the Respondent's purpose is to collect the personal and confidential information of Internet users for fraudulent purposes. This amounts to intentionally attracting Internet users to the Respondent's website by creating a likelihood of confusion as to the source or sponsorship of the website. Doing so for the purposes of the Respondnet's fraudulent commercial gain fulfills the requirements of paragraph 4(b) (iv) of the Policy which amounts to evidence of registration and use in bad faith. In any event, the overwhelming inference that the Respondent is using each of the disputed domain names for a fraudulent and illegal purpose, in the manner described above, amounts in and of itself to evidence of registration and use in bad faith.

Accordingly, the Panel finds that the Complaint fulfills the third element of the Policy in relation to each of the disputed domain names.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

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

1. **action-paysend.com** : Transferred
2. **paysend-id644-receive.com**: Transferred
3. **paysend-id6255-au.com**: Transferred
4. **pay-send-aus.com** : Transferred
5. **pay-send-id.com**: Transferred

PANELLISTS

Name	**Mr Alistair Payne**

DATE OF PANEL DECISION 2026-05-14

Publish the Decision