

ADMINISTRATIVE PANEL DECISION

Study Solutions A16 LLC v. leo shi
Case No. D2025-5456

1. The Parties

The Complainant is Study Solutions A16 LLC, United States of America, represented by Gile Law Group, United States of America.

The Respondent is leo shi, Hong Kong, China, self-represented.

2. The Domain Name and Registrar

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

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 31, 2025. On January 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 3, 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 (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 January 5, 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 amendment to the Complaint on January 5, 2026.

The Center verified that the Complaint together with the amendment to the 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 Respondent of the Complaint, and the proceedings commenced on January 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was January 27, 2026. The Response was filed with the Center on January 26, 2026.

The Center appointed Jeremy Speres as the sole panelist in this matter on February 5, 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 has, since August 2024, operated a website at its domain name <grubby.ai> (registered in June 2024) under the GRUBBY.AI mark that allows users to humanize Artificial Intelligence (“AI”) text and bypass AI detectors. Since the Complainant began operating its website, it has had over 593,000 unique visitors and has over 42,000 paid subscribers. As of December 2025, the Complainant’s Instagram page (launched in August 2024) had 21,700 followers; the Complainant’s TikTok page (launched in August 2024) had over 2,700 followers and 86,000 likes; and the Complainant’s YouTube channel (launched in July 2024) had been viewed more than 429,000 times.

The Complainant has no registered trademarks but claims common law rights in its GRUBBY.AI mark.

The disputed domain name was registered on November 12, 2024, and presently resolves to a sparse website stating that the disputed domain name is under administrative review. The Complainant’s evidence establishes that the disputed domain name previously resolved to a website entitled “Grubby AI Humanize” along with the descriptor (“helps you bypass AI detector with undetectable content”).

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.

Notably, the Complainant contends that the disputed domain name was registered and has been used in bad faith in order to take advantage of the reputation of the Complainant’s mark, relying on confusion with the Complainant’s competing service for the Respondent’s commercial gain.

B. Respondent

The Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name.

Notably the Respondent contends as follows:

The term “grubby” is a common English word with a descriptive meaning and does not inherently identify a single commercial source. The Complainant has not demonstrated that its mark was widely known, distinctive, or of such notoriety that the Respondent should be presumed to have been aware of it at the time of registration of the disputed domain name.

The Respondent’s good faith is demonstrated by the fact that upon receiving notice of these proceedings, the Respondent promptly discontinued all use of the disputed domain name.

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.

The Panel finds the Complainant has established unregistered trademark or service mark rights for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.3. The Complainant's evidence, summarized in the Factual Background section above, shows that its GRUBBY.AI mark has enjoyed considerable exposure on the Internet. The Panel has independently¹ run Internet searches for the Complainant's mark, the results of which overwhelmingly relate to the Complainant across the first few pages of results.

The Panel finds the mark is recognizable within the disputed domain name. 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 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.

As discussed in relation to the third element below, it is likely that the Respondent's intentions were to benefit from confusion with the Complainant's mark. This cannot confer rights or legitimate interests. *Sistema de Ensino Poliedro Vestibulares Ltda., Editora Poliedro Ltda. v. Anonymize, Inc. / STANLEY PACE*, WIPO Case No. [D2022-1981](#).

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

¹ In accordance with its powers articulated inter alia in paragraphs 10 and 12 of the Rules, the Panel is entitled to conduct limited independent research into matters of public record. [WIPO Overview 3.0](#), section 4.8.

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.

The Complainant's evidence relating to the exposure of its mark on the Internet largely postdates registration of the disputed domain name. However, the Panel has run Internet searches for the Complainant's mark and the second-level portion of the disputed domain name which were time-limited to results published prior to registration of the disputed domain name. These results overwhelmingly relate to the Complainant, showing that its mark, and the second-level portion of the disputed domain name, were overwhelmingly associated with the Complainant prior to registration of the disputed domain name and corroborate the Complainant's contentions and evidence.

Contrary to the Respondent's assertion, the Complainant's mark is not descriptive in the context of its or the Respondent's services. It would appear to be inherently unique and distinctive in that context.

The Respondent has provided no explanation for his choice of a domain name that is virtually identical to the Complainant's inherently unique mark at a time when that mark was firmly associated with the Complainant, and which domain name has been used for a competing service.

The field in which both Parties operate is fairly niche and it is thus less likely that two operators of competing services would have independently chosen virtually identical brands purely by coincidence, especially an inherently unique brand as in this case. The Respondent is also apparently very familiar with the other players in this particular field, stating in his Response: "The AI text refinement market is highly competitive and crowded, with numerous providers offering similar services." Given his familiarity with this landscape, it is more likely that the Respondent would have been aware of the Complainant at the time he registered the disputed domain name.

On balance of probabilities, the Panel finds that it is more likely than not that the Respondent sought to capitalize on confusion with the Complainant's mark, falling squarely within paragraph 4(b)(iv) of the Policy.

In the circumstances of this case, the Respondent's subsequent removal of competing services from the disputed domain name website, after receiving notice of the Complaint, does not prevent a finding of bad faith or alter the above finding of bad faith.

The Panel finds that the Complainant has established the third element of the Policy.

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 <grubbyai.com> be transferred to the Complainant.

/Jeremy Speres/

Jeremy Speres

Sole Panelist

Date: February 13, 2026