

ADMINISTRATIVE PANEL DECISION

The Trustees of Julia Child Foundation for Gastronomy and the Culinary Arts
v. Jeremiah Long
Case No. D2026-0887

1. The Parties

The Complainant is The Trustees of Julia Child Foundation for Gastronomy and the Culinary Arts, United States of America ("United States"), represented by Mandelbaum Silfin LLC, United States.

The Respondent is Jeremiah Long, United States.

2. The Domain Name and Registrar

The disputed domain name <juliachildsrecipes.com> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 27, 2026. On March 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 2, 2026, the Registrar transmitted by email to the Center its verification response registrant and contact information for the disputed domain name which differed from the named Respondent (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 3, 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 March 4, 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 Respondent of the Complaint, and the proceedings commenced on March 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 31, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 13, 2026.

The Center appointed W. Scott Blackmer as the sole panelist in this matter on April 16, 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 foundation operates as a trust organized under the laws of the Commonwealth of Massachusetts, United States. The Panel notes that Julia Carolyn Child (née McWilliams), 1912-2004, was a celebrated American chef, author, and television personality with numerous books, articles, television programs, media appearances and industry awards to her credit (see Wikipedia article, “Julia Child”, and publications cited therein).¹ Since the death of Julia Child in 2004, the Complainant states that it has been “the sole and exclusive successor-in-interest to the name and legacy of Julia Child, including by virtue of rights assigned through her last will and testament”. The Complainant’s claim is supported by copies of the will and the registration of its claim as successor-in-interest with the California Secretary of State, attached to the Complaint.

Julia Child’s personal name was associated in commerce with her books and media productions, as well as with various articles of merchandise such as cookware and household products, beginning in 1961, when she published her first best-seller, *Mastering the Art of French Cooking*. The Panel notes that Julia Child presented the long-running television program *The French Chef* from 1963 through 1973, as well as subsequent programs branded with her name over the years into the 1990s, *Julia Child & Company*, *Julia Child & More Company*, *Dinner at Julia’s*, *In Julia’s Kitchen with Master Chefs*, *Baking with Julia*, and *Julia and Jacques Cooking at Home*. Julia Child also produced a succession of cookbooks and collections of recipes such as *The French Chef Cookbook*, *Mastering the Art of French Cooking, Volume Two*, *From Julia Child’s Kitchen*, as well as other books such as *Julia Child and More Company*, for which she won a National Book Award in 1980. She co-founded the American Institute of Wine and Food in 1981 and appeared often on television talk shows and special productions. She remained in public view in her later years as she became a spokesperson for AIDS activists and children’s nutrition education and published an autobiography. Wikipedia, “Julia Child”.

The Complainant holds relevant trademark registrations including the following:

Mark	Jurisdiction	Reg. Number	Reg. Date	International Class
JULIA CHILD AWARD (word) (disclaimer for the word “award”)	United States	5220827	June 13, 2017 (application filed November 30, 2015)	35, 41
JULIA CHILD (word)	United States	8073422	December 23, 2025 (application filed March 8, 2024)	31

In addition, the Complainant claims that JULIA CHILD has acquired common law protection as “a famous and distinctive personal name” given widespread public recognition of Julia Child’s “contribution to the culinary arts, cookbooks, television appearances, and public appearances”.

¹ Noting the general powers of a panel articulated in paragraphs 10 and 12 of the Rules, it is commonly accepted that a panel may undertake limited factual research into matters of public record, as the Panel has done in these proceedings. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.8.

The Panel notes that the Complainant operates a website concerning the Julia Child Award at “www.juliachildaward.com”, and her publishers maintain her publications and online guides to her cookbooks (see Penguin Random House, “Your Guide to Julia Child Books and Cookbooks”, “www.penguinrandomhouse.com/the-read-down/julia-child-cookbooks”). These also remain available for sale through various online stores such as Amazon.com, presumably subject to royalties to which the Complainant is entitled as successor-in-interest.

The disputed domain name was created on February 13, 2011, and is registered to the Respondent Jeremiah Long, listing a postal address in the State of California and a Gmail contact email address. The disputed domain name resolves to a website (the “Respondent’s website”) headed “Julia Child’s Recipes” with the tagline “classic food”. This is a multipage website with pages on “French Recipes”, “Chicken Recipes”, “Soup”, “Beef”, “Dinner”, “Ham”, and “Vegetables”. The pages feature photographs, descriptions, and recipes. Site visitors may post comments and subscribe to the feed. The website does not require payment but presents advertising banners from third-party advertisers. The copyright notice on the Respondent’s website is simply in the name of “JuliaChildsRecipes.com”, and the “About” page (like the “Privacy Policy” page) does not identify the website operator, saying only that the operator is very experienced in cooking recipes from other chefs and that the site is “a place to find great recipes from the late Julia Child”. The “Contact” page does not provide contact information about the site operator but invites visitors to enter their own names, email addresses, and messages (an email address for the operator is provided in the Privacy Policy).

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 is confusingly similar to its JULIA CHILD mark corresponding to the well-known personal name “Julia Child” and that the Respondent has no permission to use this mark. The Complainant asserts that the Respondent’s website, featuring recipe content invoking Julia Child’s name, creates a false impression of association with her and that this cannot be a legitimate use. The disputed domain name was registered after Julia Child died and the Complainant acquired enforceable rights in the JULIA CHILD mark. The Complainant argues that the Respondent’s use of the disputed domain name for a recipe website demonstrates intent to trade on the reputation of a famous chef and constitutes bad faith to attract Internet traffic, even absent evidence of direct monetization, potentially harming the goodwill associated with the mark.

B. Respondent

The Respondent did not reply to the Complainant’s contentions.

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 3.1](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark (the registered JULIA CHILD and JULIA CHILD AWARD marks) for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel also finds the Complainant has established unregistered trademark or service mark rights in JULIA CHLD for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.3. This finding is not necessary for the first element but is relevant for the second and third elements of the Complaint. There is ample evidence from publicly available sources that Julia Child's personal name was widely associated with publications, television programs, and merchandise such as to acquire secondary meaning in commerce as early as the 1960s, and that this continued to be the case when the disputed domain name was registered in 2011.

The entirety of the JULIA CHLD mark and the non-disclaimed portion of the JULIA CHILD AWARD mark are reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms (here, the possessive "s" and the word "recipes") may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

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 that 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 3.1](#), 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. The Respondent is not clearly using the associated website for a bona fide offering of goods or services (Policy, paragraph 4(c)(i)), although the site displays some third-party commercial advertising. The commercial aspects of this use would not be considered "bona fide" in any event, given the fact that the website does not even disclose the identity of the website operator. The Respondent also has not demonstrated that it is making noncommercial, legitimate fair use of the disputed domain name for a criticism or fan site under Policy paragraph 4(c)(iii), as the content appears largely to consist of simply repeating printed JULIA CHLD recipes that are likely still under copyright in her published works. This does not appear to be genuine commentary but rather unauthorized republication. [WIPO Overview 3.1](#), sections 2.6, 2.7. Moreover, there is no disclaimer of affiliation with Julia Child or her successor-in-interest, and the risk of false association is high with such a confusingly similar domain name. See *Everytown for Gun Safety Action Fund, Inc. v. Contact Privacy Inc. Customer 1249561463 / Steve Coffman*, WIPO Case No. [D2022-0473](#). In the totality of these circumstances, the Panel observes that the website gives the impression of being an official site of the Complainant, which it is not, and therefore does not find that the Respondent could reasonably claim a fair-use legitimate interest in employing the disputed domain name to reprint JULIA CHLD recipes as it has done.

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

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.

In the present case, the Panel notes that the Respondent registered the confusingly similar disputed domain name and used it for a site republishing JUILA CHILD recipes long after JULIA CHILD had become a well-known mark in the United States associated with cooking and published recipes. Reprinting and distributing some of those recipes for free, or for the benefit of advertisers who pay for space on the Respondent's website, unfairly deprives the Complainant of its rights. Publishing variations or different recipes falsely associated with the mark risks diminishing the reputation associated with the mark. In either case, the misdirection of Internet users to another site for commercial gain (whether the Respondent's or third parties') by creating a likelihood of confusion with the Complainant's mark meets one of the examples of bad faith given in the Policy, paragraph 4(b)(iv).

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 <juliachildsrecipes.com> be transferred to the Complainant.

/W. Scott Blackmer/

W. Scott Blackmer

Sole Panelist

Date: April 30, 2026