

## **ADMINISTRATIVE PANEL DECISION**

Gena O’Kelley Norris, as Executor of the Estate of Carlos Ray Norris v. Trai Pham

Case No. D2026-3899

### **1. The Parties**

The Complainant is Gena O’Kelley Norris, as Executor of the Estate of Carlos Ray Norris, United States of America (“United States”), represented by Squire Patton Boggs (US) LLP, United States.

The Respondent is Trai Pham, Viet Nam.

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

The disputed domain name <chucknorristribute.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 August 31, 2026. On September 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 2, 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 (Withheld for Privacy LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 4, 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 September 8, 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 September 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 1, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 2, 2026.

The Center appointed Ganna Prokhorova as the sole panelist in this matter on October 9, 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 is the executor of the estate of Carlos Ray Norris, an American actor, martial artist, film producer and author known professionally as Chuck Norris. According to the Complaint, Mr. Norris passed away on March 19, 2026, and Gena O'Kelley Norris has since been confirmed as the executor of his estate (the "Estate").

Mr. Norris appeared under the name Chuck Norris in a number of motion pictures from the early 1970s, including *The Way of the Dragon* (1972), *Missing in Action* (1984) and *The Delta Force* (1986), and was the lead actor and an executive producer of the television series *Walker, Texas Ranger*, first broadcast in 1993. Before his acting career, he competed in karate tournaments from the mid-1960s and won a number of national and international titles. He founded a martial arts style taught today as the Chuck Norris System, known as Chun Kuk Do between 1990 and 2015, and authored several books, including his autobiography *The Secret of Inner Strength* (1988).

The Complaint relies on a number of United States trademark registrations for the CHUCK NORRIS word mark recorded in the name of Mr. Norris, including, among others:

- United States Trademark Registration No. 2124757 for CHUCK NORRIS (word), registered on December 30, 1997, for martial arts training services in class 41;
- United States Trademark Registration No. 2864474 for CHUCK NORRIS (word), registered on July 20, 2004, for entertainment services in class 41; and
- United States Trademark Registration No. 3676437 for CHUCK NORRIS (word), registered on September 1, 2009, for T-shirts in class 25.

The Complaint also relies on United States Trademark Registration No. 6682420 for a device mark incorporating the wording CHUCK NORRIS APPROVED, registered on March 29, 2022, for promoting the products and services of others through authorized use of the mark on products, packaging, and marketing materials, and for cooperative advertising and marketing services in class 35.

The disputed domain name was registered on March 21, 2026. According to the case file, the disputed domain name resolved to a website offering Chuck Norris-themed merchandise, including shirts, hats, mugs, stickers, and flags. The products displayed Chuck Norris's name, likeness, and, in some instances, the wording "Chuck Norris Approved". Some products were described as memorial merchandise.

On July 6, 2026, the Complainant's representatives sent a cease-and-desist letter to the contact email address displayed on the website. The letter demanded, among other things, cessation of the allegedly infringing activities and transfer of the disputed domain name. According to the Complaint, the Respondent replied that they would "remove these domain activities" and subsequently deactivated the website, but did not transfer the disputed domain name.

## **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:

- 1) The Complainant has standing to file the Complaint in her capacity as executor of the Estate. Mr. Norris owned the CHUCK NORRIS trademarks, the rights in which form part of the Estate and may be exercised by the Complainant as executor. The Complainant relies on the registrations of Mr. Norris's professional name as a trademark. The disputed domain name incorporates the CHUCK NORRIS mark in its entirety, and neither the addition of the descriptive term "tribute" nor the generic Top-Level Domain ("gTLD") ".com" prevents a finding of confusing similarity.
- 2) The Respondent has no rights or legitimate interests in the disputed domain name. Neither the Complainant nor the Estate has any relationship with the Respondent or has authorized the Respondent to use Mr. Norris's name or the CHUCK NORRIS marks. The Respondent is not commonly known by the disputed domain name, and the longstanding use and registration of the marks predate the registration of the disputed domain name. The Respondent exploits the goodwill associated with Mr. Norris's name and marks to attract Internet users to a website selling unauthorized merchandise. This activity infringes the Estate's trademark rights and constitutes neither a bona fide offering of goods or services nor a legitimate noncommercial or fair use.
- 3) The disputed domain name was registered and is being used in bad faith. Given Mr. Norris's international reputation, the longstanding use of the CHUCK NORRIS marks, and the merchandise offered on the website, the Respondent knew of the relevant trademark rights when registering the disputed domain name. By offering unauthorized merchandise bearing the marks, the Respondent intentionally sought to attract Internet users for commercial gain through confusion as to the source, sponsorship, affiliation, or endorsement of the website and its products, within the meaning of paragraph 4(b)(iv) of the Policy. The Complainant maintains that visitors would believe the merchandise was endorsed or licensed by the Estate. The Complainant further relies on the Respondent's failure to transfer the disputed domain name following the cease-and-desist letter, despite stating that it would remove the associated activities and subsequently deactivating the website.

### **B. Respondent**

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

## **6. Discussion and Findings**

Paragraph 15(a) of the Rules provides that the Panel is to decide the Complaint on the basis of the statements and documents submitted in accordance with the Policy, the Rules, and any rules and principles of law that it deems applicable.

To succeed, the Complainant must demonstrate that all three elements listed in paragraph 4(a) of the Policy have been satisfied, namely:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and

(iii) the disputed domain name has been registered and is being used in bad faith.

The Respondent was given proper notice of the Complaint and had the opportunity to respond, but did not do so. The Respondent's default does not mean that the Complainant automatically prevails; the Complainant continues to bear the burden of proof on each element. The Panel may, however, draw appropriate inferences from the Respondent's silence and accept as true the reasonable allegations in the Complaint that are not contradicted by the evidence. WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.3.

The Panel has reviewed the entire case file. In addition, and in view of certain gaps in the record discussed below, the Panel has consulted the publicly available records of the United States Patent and Trademark Office ("USPTO") and previously published decisions involving the same Complainant. [WIPO Overview 3.1](#), section 4.8.

#### **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 trademark registrations on which the Complaint is based are recorded in the name of the late Carlos Ray Norris. The Complaint asserts that the rights in these marks form part of the Estate and that the Complainant, as executor, is entitled to exercise them, but the record of the present proceeding contains no evidence of Mr. Norris's death or of the Complainant's appointment as executor.

The Panel notes, however, that this question was examined in *Gena O'Kelley Norris as Executor of the Estate of Carlos Ray Norris v. Le Van Truong*, WIPO Case No. [D2026-0586](#). In that case, the panel received Letters Testamentary for the Estate dated May 7, 2026, issued by the Clerk of the County Court of Grimes County, Texas, found that Mr. Norris died on March 19, 2026, and held that the rights in the CHUCK NORRIS trademark form part of his estate and that the Complainant, as executor, is entitled to exercise them. The panel in *Gena O'Kelley Norris, Executor of the Estate of Carlos Ray Norris v. Michael Anderson*, WIPO Case No. [D2026-2577](#), likewise accepted that the Estate holds rights in the CHUCK NORRIS mark. The USPTO records consulted by the Panel confirm that several registrations for the CHUCK NORRIS mark remain in force, including United States Trademark Registrations Nos. 2124757, 2864474 and 5955740. The Panel sees no reason to depart from the findings in the earlier decisions.

Accordingly, the Panel finds that the Complainant has shown rights in respect of the CHUCK NORRIS trademark for the purposes of the Policy. [WIPO Overview 3.1](#), sections 1.2.1 and 1.5.1.

The disputed domain name reproduces the CHUCK NORRIS mark in its entirety, followed by the term "tribute". The mark is clearly recognizable within the disputed domain name, and the addition of this term does not prevent a finding of confusing similarity, although it may bear on the assessment of the second and third elements. [WIPO Overview 3.1](#), sections 1.7 and 1.8. The gTLD ".com" is a standard registration requirement and is disregarded for the purposes of this comparison. [WIPO Overview 3.1](#), section 1.11.1.

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 record, the Panel finds that the Complainant has made a prima facie showing that the Respondent lacks rights or legitimate interests in the disputed domain name. Neither Mr. Norris nor the Estate has authorized the Respondent to use the CHUCK NORRIS mark, and nothing in the record suggests that the Respondent, identified by the Registrar as Trai Pham, is commonly known by the disputed domain name. The Respondent has not filed a Response and has therefore not rebutted this showing.

The Panel has nevertheless considered whether the term “tribute” could support a claim of legitimate non-commercial or fair use under paragraph 4(c)(iii) of the Policy. Where a domain name combines a mark with an additional term and is used for a fan or informational site, panels may find a legitimate interest if the use is fair in all the circumstances, and a noncommercial character tends to support such a finding. [WIPO Overview 3.1](#), section 2.7.3. To qualify, such a site must be active, genuine and clearly distinct from any official site of the trademark owner. [WIPO Overview 3.1](#), section 2.7.1.

The record does not show such a site. The only evidence of the website content, a screenshot dated July 4, 2026, shows merchandise presented as individual product listings, including caps, T-shirts, a mug, a sticker and flags, all bearing Mr. Norris’s name or image. Several items reproduce the device of the Complainant’s registered CHUCK NORRIS APPROVED mark. Nothing in the record indicates any commemorative or informational content beyond the use of “memorial” in the titles of some products. In these circumstances, the reference to a tribute in the disputed domain name appears to serve as a pretext for the sale of unauthorized merchandise rather than as a genuine expression of homage. [WIPO Overview 3.1](#), section 2.5.2. In the circumstances, the Respondent’s use of the disputed domain name to offer merchandise bearing the Complainant’s mark, without authorization and without accurately disclosing its relationship with the Complainant or the Estate, does not constitute a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy.

According to the Complainant, the website was deactivated after the Respondent received the cease-and-desist letter, and the disputed domain name did not resolve to an active website at the commencement of this proceeding. The Respondent has offered no explanation in this proceeding for its choice of the disputed domain name.

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.

The Panel is satisfied that the Respondent had Mr. Norris and his CHUCK NORRIS mark in mind when it registered the disputed domain name. The mark had been used for several decades in connection with films, television, martial arts and merchandise, and the disputed domain name reproduces it in full. The disputed domain name was registered on March 21, 2026, two days after Mr. Norris’s death, and the website later displayed products marketed as memorial items, one of them bearing the years “1940-2026”. The timing of the registration and the website content show that the Respondent registered the disputed domain name to exploit the public attention that followed Mr. Norris’s death. [WIPO Overview 3.1](#), section 3.2.1.

As to use, the Respondent used the disputed domain name for a website displaying merchandise bearing Mr. Norris’s name and image and reproducing the device of the CHUCK NORRIS APPROVED mark. Nothing in the record indicates that the website disclosed the absence of any relationship with the Estate. The

Panel finds that, by using the disputed domain name in this manner, the Respondent intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of its website and the products displayed on it, within the meaning of paragraph 4(b)(iv) of the Policy. [WIPO Overview 3.1](#), section 3.1.4.

The deactivation of the website after receipt of the cease-and-desist letter does not alter this conclusion. The Respondent has kept the disputed domain name and has not suggested any good faith use it might make of it. Considering the reputation of the CHUCK NORRIS mark, the composition of the disputed domain name and the Respondent's prior use of it, the Panel finds that the current non-use of the disputed domain name does not prevent a finding of bad faith. [WIPO Overview 3.1](#), section 3.3.

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 <chucknorrishtribute.com> be transferred to the Complainant.

*/Ganna Prokhorova/*

**Ganna Prokhorova**

Sole Panelist

Date: October 20, 2026