

ADMINISTRATIVE PANEL DECISION

Two Sigma Investments, LP v. Amanda Neville
Case No. D2025-1074

1. The Parties

The Complainant is Two Sigma Investments, LP, United States of America (“United States”), represented by Dorsey & Whitney, LLP, United States.

The Respondent is Amanda Neville, Hong Kong, China.

2. The Domain Name and Registrar

The disputed domain name <twosigma.vip> 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 March 14, 2025. On March 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 17, 2025, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 18, 2025, 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 21, 2025.

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 21, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 10, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 11, 2025.

The Center appointed Jeremy Speres as the sole panelist in this matter on April 17, 2025. 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 2001, traded as a hedge fund and investments firm under its TWO SIGMA mark, having various offices in the United States as well as in London, United Kingdom, Tokyo, Japan, Hong Kong, China, and Shanghai, China. The Complainant's primary website is accessible from its domain name <twosigma.com>, which was registered on March 9, 2001.

The Complainant's TWO SIGMA mark is registered in numerous jurisdictions, including in Hong Kong, China (where the Respondent is based) under Trademark Registration No. 305009003 TWO SIGMA in class 36, having a registration date of Apr 9, 2020.

The disputed domain name was registered on February 26, 2024. The Complainant's evidence establishes that the disputed domain name resolves to a website entitled "TSAI", ostensibly for a company providing artificial intelligence-based investment services in the hedge fund industry, claiming to be "Two Sigma".

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 impersonate the Complainant for the Respondent's commercial gain.

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 of WIPO Panel Views on Selected UDRP Questions, Third Edition, (["WIPO Overview 3.0"](#)), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the mark is reproduced within the disputed domain name. Bearing in mind that spaces between words are incapable of representation within domain names, the disputed domain name is identical 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.

For the reasons discussed in relation to bad faith below, it is likely that the Respondent registered the disputed domain name to take advantage of confusion with the Complainant’s mark. The Respondent’s registration and use of the disputed domain name in these circumstances cannot represent a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy and 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](#).

Generally speaking, UDRP panels have found that domain names identical to a complainant’s trademark, as in this case, carry a high risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1.

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.

For the following reasons, the Panel finds that it is more likely than not that the Respondent registered and has used the disputed domain name to take advantage of confusion with the Complainant’s mark for the Respondent’s commercial gain, falling squarely within paragraph 4(b)(iv) of the Policy.

The Complainant claims that its mark is well known but has provided none of the evidence typically required to establish this. Nevertheless, in accordance with its powers of independent research articulated inter alia in paragraphs 10 and 12 of the Rules, the Panel’s cursory Internet searches indicate that the Complainant’s mark does at least enjoy a reputation within the hedge fund industry. Panels have consistently found that the mere registration of a domain name that is identical to a widely known trademark, as in this case, by an unaffiliated entity can by itself create a presumption of bad faith. This is particularly apposite in this case given the Respondent’s use of the disputed domain name in relation to services targeted at the same industry as the Complainant in which the Complainant’s mark enjoys a reputation. [WIPO Overview 3.0](#), section 3.1.4.

The Complainant's mark is not generic or descriptive in its industry and is inherently distinctive. In light of this and the reputation of the Complainant's mark, the selection of the disputed domain name, which is identical to the Complainant's mark, is unlikely to have been a coincidence in circumstances where the disputed domain name has ostensibly been used for services competitive with the Complainant.

The Complainant has a presence in Hong Kong, China, where the Respondent is based, thus it is likely that the Respondent was aware of the Complainant when it registered the disputed domain name.

The Complainant claims to be well known for its use of technological methods, including artificial intelligence, in the hedge fund space. This is borne out by the Panel's cursory Internet searches. The use of the disputed domain name ostensibly for an artificial intelligence offering targeted at hedge funds is inherently misleading and further points to targeting of the Complainant.

The Panel draws an adverse inference from the Respondent's failure to take part in the present proceeding where an explanation is certainly called for. [WIPO Overview 3.0](#), section 4.3.

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 <twosigma.vip> be transferred to the Complainant.

/Jeremy Speres/

Jeremy Speres

Sole Panelist

Date: April 29, 2025