

## ADMINISTRATIVE PANEL DECISION

Kimberly M. Hanlon, Kimberly M. Hanlon, LLC v. bone clinkz  
Case No. D2025-2219

### 1. The Parties

The Complainant is Kimberly M. Hanlon, Kimberly M. Hanlon, LLC, United States of America (the “USA”), represented by Lucère Legal, USA.

The Respondent is bone clinkz, Cambodia.

### 2. The Domain Name and Registrar

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

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 6, 2025. On June 6, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On June 6, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Unknown, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 11, 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 June 12, 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 July 9, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 29, 2025. The Respondent sent email communications to the Center on July 11, 2025, and August 9, 2025.

The Center appointed Dawn Osborne as the sole panelist in this matter on August 13, 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**

Kimberly M. Hanlon, (Ms. Hanlon) attorney at law is the managing member of Kimberly M. Hanlon, LLC, a law firm, which was organized in the State of Minnesota, USA, on March 18, 2011. Previously she operated through the law firm Kimberly M. Hanlon, PLLC which was initially organized in the State of Oklahoma, USA, on February 3, 2009. Thereafter the Oklahoma entity was dissolved, although the firm continued to represent clients in both states through the Minnesota entity. The Domain Name and the marks KHANLON LAW and KHANLONLAW.COM have been used since April 2009, and Ms. Hanlon operating through Kimberly M. Hanlon LLC continuously uses the marks in commerce to the present day.

The Respondent purchased the Domain Name on May 24, 2025, 16 days after the Complainant had unsuccessfully attempted to renew it during the first days of redemption, but the Complainant alleges that was not successful due to a miscommunication with the registrar's customer service agent.

Respondent has pointed the Domain Name to the Complainant's past website homepage as found on the Internet Archive's Wayback Machine. The main email addresses previously used by the Complainant, namely [...]@khanlonlaw.com and [...]@khanlonlaw.com, are email accounts that remained active on the Domain Name and the Respondent can receive communications intended for the Complainant.

The Respondent's identity is masked behind a pseudonym. Clinkz the Bone Fletcher is a character in the Dota 2 video game.

The Respondent communicating through the pseudonym indicated by email to the Center on July 11, 2025, that he had taken down the site attached to the Domain Name and it no longer points to an active site, and requested the Center's Standard Settlement Form.

#### **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 Domain Name.

Notably, the Complainant contends that:

The Domain Name has become a distinctive identifier to clients and potential clients of Ms. Hanlon and Kimberley M. Hanlon LLC as well as the general public in Minnesota, through extensive use on legal publications, community appearances, and marketing materials and due to use as the firm's email contact address for its clients.

The Respondent has registered the Domain Name which is identical to the Complainant's prior (common law) marks KHANLON LAW and KHANLONLAW.COM for the purposes of the Policy. It has used the mark in commerce for a range of activities including a child protection planning guide, consumer reports on estate planning and on entrepreneurship, various mailers; for appearances at community events, to advertise legal services, for client communications, and so on. The Complainant also held for many years the domain name corresponding to its mark which included a logo and branding materials.

The Respondent is not commonly known by the Domain Name or authorised by the Complainant. As the Respondent has used the Domain Name to impersonate the Complainant, pointing the Domain Name to a previous version of the Complainant's web site and configuring the Domain Name to receive communications for the Complainant, the Respondent does not have any rights or legitimate interests in the Domain Name. The Respondent's activities and provision of false details to the Whois database constitute registration and use in bad faith.

## **B. Respondent**

The Respondent did not reply to the Complainant's contentions apart from the emails to the Center on July 11, 2025, indicating that he had taken the site attached to the Domain Name down and requested the Center's Standard Settlement Form, and an email dated August 9, 2025, in response to the commencement of the panel appointment process, merely consisting of a question mark.

## **6. Discussion and Findings**

### **Preliminary Issue: Multiple Complainants**

As described in WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 4.11.1, in assessing whether a complaint filed by multiple complainants may be brought against a single respondent, panels look at whether (i) the complainants have a specific common grievance against the respondent, or the respondent has engaged in common conduct that has affected the complainants in a similar fashion, and (ii) it would be equitable and procedurally efficient to permit the consolidation.

The Panel notes the Ms Hanlon and Kimberly M. Hanlon LLC jointly own rights in KHANLON LAW and KHANLONLAW.COM since at least 2011. As such they plainly have a specific common grievance against the Respondent whose conduct has affected them both – they are in effect one-and-the same notwithstanding a formal change of corporate designation. The Panel agrees that allowing multiple Complainants in this Complaint would be efficient and fair to all parties.

### **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 3.0](#), section 1.7.

Based on the evidence submitted, the Panel finds the Complainant has established unregistered trademark or service mark rights in her law firm name as continuously used in commerce, as well as in KHANLONLAW.COM, for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.3 and 1.5.

The entirety of the mark is reproduced within the Domain Name. Accordingly, the 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 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 Domain Name such as those enumerated in the Policy or otherwise.

The Respondent is not authorised by the Complainant or commonly known by the Domain Name. The Respondent has used a false name for the Whois details of the Domain Name and, after the Complainant lost control of the Domain Name due to a lapse in registration, has pointed the Domain Name to a previous version of the Complainant's site, effectively impersonating the Complainant. Further, the email addresses used by the Complainant remain active, meaning the Respondent would receive emails intended for the Complainant. The Domain Name carries a very high risk of affiliation with the Complainant.

Panels have held that the use of a domain name for illegitimate activity, here impersonation, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1. Pointing a domain name containing a complainant's mark to the Complainant's own site, receiving emails intended for the Complainant and providing false contact details for that domain name are not separately or collectively a bona fide offering of services or a legitimate noncommercial fair use. [WIPO Overview 3.0](#), section 2.5.2.

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 who has provided false details to the Whois database for the Domain Name pointed the Domain Name to the Complainant's past website homepage as found on the Internet Archive's Wayback Machine, impersonating the Complainant. The main email addresses previously used by the Complainant remained active on the Respondent's domain enabling the Respondent to receive communications intended for the Complainant.

Panels have held that the use of a domain name for illegitimate activity here, impersonation constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

The provision of false contact details for the Whois details is also regarded by Panels as further evidence of bad faith. [WIPO Overview 3.0](#), section 3.2.1.

Having reviewed the record, the Panel finds the Respondent's registration and use of the Domain Name constitutes bad faith under the Policy.

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 Domain Name <khanlonlaw.com> be transferred to the Complainant.

*/Dawn Osborne/*

**Dawn Osborne**

Sole Panelist

Date: August 18, 2025