

ADMINISTRATIVE PANEL DECISION

Alexandra Cooper v. Salman Jamil

Case No. D2025-2944

1. The Parties

The Complainant is Alexandra Cooper, United States of America (“United States”), represented by Nolan Heimann LLC, United States.

The Respondent is Salman Jamil, Pakistan.

2. The Domain Name and Registrar

The disputed domain name <alexandracooperpodcast.com> is registered with Hostinger Operations, UAB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 23, 2025. On July 25, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 25, 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 (Domain Admin) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 28, 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 amendment to the Complaint on the same day.

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 July 31, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 20, 2025. The Respondent sent email communications to the Center on July 29, 2025.

The Center appointed Rebecca Slater as the sole panelist in this matter on August 26, 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 is the host of a successful podcast “Call Her Daddy”. Her podcast is one of the most popular podcasts globally, with over 10 million listeners per episode. She is also the founder of a media platform, the Unwell Network. Under the Unwell brand, the Complainant has recently launched the beverage brand Unwell Hydration.

The Complainant claims common law trade mark rights in her name “Alexander Cooper” (the “Trade Mark”). The Complainant uses the Trade Mark with respect to podcasts, sound recordings, relationship coaching, and merchandise. The Complainant began using the Trade Mark in trade and commerce in October 2018 when the “Call Her Daddy” podcast debuted. Under the Trade Mark, she has amassed 3.6 million followers on Instagram and 2.7 million followers on TikTok. The Complainant was also the subject of the recent docuseries “Call Her Alex”.

The Respondent is an individual apparently located in Pakistan. The Respondent did not submit a response, and consequently little information is known about the Respondent.

The disputed domain name was registered on May 9, 2025.

The disputed domain name is currently inactive. At the time of the Complaint, the disputed domain name resolved to a website which featured the Trade Mark and the Complainant’s “Call Her Daddy” trade mark. The home page stated: “Join Alexandra Cooper for comedy, advice, and exclusive insights from Hollywood’s elite.” Other pages featured an article titled “Alexandra Cooper: The Voice of a Generation in Podcasting” and links to “Listen” titled “Welcome to Alexandra Cooper’s World” and “Call Her Daddy”.

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 identical to and/or confusingly similar to the Trade Mark. It only adds the word “podcast” which is a descriptive word directly associated with Complainant’s goods and services.
- The Respondent has no rights or legitimate interests in respect of the domain name. The Complainant has never granted a license, consented to, or otherwise authorized, the Respondent to use the Trade Mark. There is no indication that the Respondent is commonly known by the Trade Mark. The Respondent is using the Trade Mark to cause consumers to believe that the Respondent is affiliated with or an authorized seller of Complainant’s goods or services. There is no legitimate purpose or fair use of the disputed domain name.
- The disputed domain name was registered and is being used in bad faith. The Respondent was aware of the Complainant and the Trade Mark when registering the Trade Mark. At the time the disputed domain name was registered, the Complainant had been using the Trade Mark extensively in commerce for seven years. The website at the disputed domain name impersonates the Complainant by stating “Welcome to Alexandra Cooper’s World”. The website also uses the Complainant’s “Call Her Daddy” trade mark on each page of the website. The Respondent has registered the disputed domain name to impersonate the Complainant or to create the impression that the Respondent is affiliated with the Complainant.

B. Respondent

The Respondent did not reply to the Complainant's contentions. On July 29, 2025, the Respondent sent two emails stating "What is this?" and "I don't understand".

6. Discussion and Findings

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

1. the disputed domain name is identical or confusingly similar to a trade mark or service mark in which the Complainant has rights;
2. the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
3. the disputed domain name has been registered and is being used in bad faith.

The onus of proving these elements is on the Complainant.

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 Trade Mark 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 trade mark or service mark rights in her personal name for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.3. The Trade Mark has been used extensively by the Complainant in commerce as a designation of source, including on through her podcast and on social media. The Panel is satisfied that the Trade Mark is a distinctive identifier of the Complainant's goods and services. [WIPO Overview 3.0](#), section 1.5.2. Moreover, the fact that the Respondent is shown to have been targeting the Complainant's Trade Mark supports the Complainant's assertion that its mark has achieved significance as a source identifier.

The entirety of the Trade Mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the Trade Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms (here, "podcast") may bear on assessment of the second and third elements, the Panel finds the addition of this 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 3.0](#), 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 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.

The Panel notes that the composition of the disputed domain name carries a risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1. The Complainant has not authorized the Respondent to use the Trade Mark and there is no evidence that the Respondent has ever been commonly known by the disputed domain name.

The evidence provided by the Complainant (i.e., screenshots of the website at the disputed domain name at the time of the Complaint) indicates that the disputed domain name has been used to impersonate the Complainant or to create the false impression that the Respondent is affiliated with the Complainant. Panels have held that the use of a domain name for illegal activity (here, claimed impersonation/passing off) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

The Panel finds it highly unlikely that the disputed domain name was registered without knowledge of the Complainant and the Trade Mark, given the significant worldwide reputation of the Complainant and the composition of the disputed domain name, which includes the Trade Mark and the term "podcast" (which is descriptive of one of the Complainant's business endeavors). The Respondent's goal in registering and using the disputed domain name appears to be to attract Internet users by taking unfair advantage of the Complainant's well-known Trade Mark. This finding is reinforced by: (a) the Respondent's historical use of the website at the disputed domain name to offer services (through links to "Listen") similar to those offered by the Complainant; and (b) the use of the Trade Mark and Complainant's "Call Her Daddy" trade mark on that website. This amounts to "opportunistic bad faith" under the Policy.

Additionally, panels have held that the use of a domain name for illegal activity (here, claimed as impersonation/passing off) constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

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 <alexandracooperpodcast.com> be transferred to the Complainant.

/Rebecca Slater/

Rebecca Slater

Sole Panelist

Date: September 4, 2025