

ADMINISTRATIVE PANEL DECISION

Wikimedia Foundation, Inc. v. Ronald Robinson, Kevin Lesnar, Infinity Project Manager

Case No. D2025-3017

1. The Parties

Complainant is Wikimedia Foundation, Inc., United States of America (“United States”), represented by Zacco Sweden AB, Sweden.

Respondents are Ronald Robinson, United States; and Kevin Lesnar, Infinity Project Manager, United States.

2. The Domain Names and Registrars

The disputed domain names <wikiexpertise.net>, <wikiinnovators.co>, <wikiinnovators.net>, <wikiinnovators.org>, <wikimoderators.net>, <wikipioneer.net>, and <wikithinkers.com> are registered with NameCheap, Inc.; the disputed domain names <wikimastery.co> and <wikipioneer.co> are registered with Hosting Concepts B.V. d/b/a Registrar.eu. (the “Registrars”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 29, 2025. On July 29, 2025, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. On July 29, 2025, the Registrars transmitted by email to the Center their verification response disclosing registrant and contact information for the disputed domain names that differed from the named Respondent (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint.

The Center sent an email communication to Complainant on July 30, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting that Complainant either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. Complainant filed an amendment to the Complaint on August 2, 2025, contending that consolidation of proceedings against multiple respondents was appropriate, as elaborated below. Complainant also filed an amended Complaint which was received on August 19, 2025.

The Center verified that the Complaint together with the amendment to the Complaint and 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 Respondents of the Complaint, and the proceedings commenced on August 22, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 11, 2025. Respondents did not submit any response. Accordingly, the Center notified Respondents' default on September 17, 2025.

The Center appointed Jeffrey D. Steinhardt as sole panelist in this matter on September 24, 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

Complainant is a non-profit charitable organization dedicated to the provision and distribution of educational information provided by tens of thousands of contributors. One of Complainant's best-known projects includes Wikipedia, a free online encyclopedia that publishes content provided and edited by the public. Wikipedia includes many informational articles and a shared media repository of millions of freely usable images, sound files, and video files.

Complainant owns hundreds of trademark registrations around the world for trademarks including the term "wiki." For the mark WIKIPEDIA, Complainant's extensive portfolio of registrations include United States Registration No. 3040722, registered in class 41 on January 10, 2006; United States Registration No. 3505429, registered in classes 35, 38, 41 on September 23, 2008; and United States Registration No. 3773952, registered in classes 16, 18, 21, 25 on April 13, 2010.

Complainant registered the domain name <wikipedia.org> on January 13, 2001. Complainant also owns registrations for multiple domain names that incorporate the WIKIPEDIA family of marks, including, for example: <wikipediya.org> and <wikipediaarticle.org>.

The disputed domain name <wikithinkers.com> was registered by Respondent Ronald Robinson on June 25, 2024. The remaining eight disputed domain names were registered by Respondent Kevin Lesnar, Infinity Project Manager.

The disputed domain name <wikiinnovators.org> was registered on September 20, 2024; the disputed domain names <wikipioneer.net> and <wikipioneer.co> were registered on January 17, 2025; the disputed domain names <wikiexpertise.net>, <wikimoderators.net>, <wikiinnovators.co>, <wikiinnovators.net> and <wikimastery.co> were registered on April 8, 2025.

The <wikithinkers.com>, <wikiinnovators.org>, <wikipioneer.net>, <wikiexpertise.net>, <wikimoderators.net> and <wikipioneer.co> disputed domain names resolved to webpages purporting to provide paid creation, editing and maintenance services for the creation of content destined for posting on Complainant's Wikipedia online platform. Most of these websites also prominently feature Complainant's WIKIPEDIA logotype and puzzle globe logo.

At the time of filing the Complaint, the <wikiinnovators.co> and <wikiinnovators.net> disputed domain names resolved to pay-per-click ("PPC") parking links.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain names.

Notably, Complainant contends that Respondents are using some of the disputed domain names for undisclosed paid editing services (contrary to the usage and posting terms of Wikipedia) and, in the case of some of the disputed domain names, for fraudulent purposes. For example, Complainant avers that Respondents are using some of the disputed domain names to receive fees for creation and editing services that do not result in items that are ultimately published on Wikipedia. Complainant also alleges that Respondents are using Complainant's trademarks and logos on the websites to which the disputed domain names resolve without the necessary authorizations.

Complainant requests consolidation to include the multiple named registrants in a single UDRP proceeding because Complainant believes that the disputed domain names "are all associated with a larger organization that uses shell companies working as fronts for a hub. All domains except <wikithinkers.com> refer to 'Kevin Lesnar' [as registrant]." Complainant also avers that the <wikithinkers.com> registrant used the same phone number used for registration of the remaining domain names.

B. Respondents

Respondents did not reply to Complainant's contentions.

6. Discussion and Findings

Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. Complainant requests consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.11.2.

With respect to common control, the Panel notes that many of the disputed domain names not only contain similar content and offer similar services, but, as Complainant notes, the registrant for <wikithinkers.com> used the same phone number in its registration as the number used by the registrant for all but two of the disputed domain names, suggesting that the same party is behind all of the disputed domain names. The Panel agrees and therefore determines that all of the disputed domain names are under common control.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as “Respondent”) in a single proceeding.

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 straightforward comparison between Complainant’s trademarks and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

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 Panel notes that the distinctive “WIKI” element in Complainant’s WIKIPEDIA marks is reproduced in all of the disputed domain names, adding terms such as “thinkers,” “innovator”, or “pioneer.” The Panel therefore finds that the disputed domain names are confusingly similar to Complainant’s marks for purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel finds the first element of Policy paragraph 4(a) has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which 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.

Complainant alleges that Respondent is offering editing and creation services without disclosing on Wikipedia that fees are being paid for developing and maintaining the postings on Complainant’s Wikipedia online encyclopedia. Such commercial use of confusingly similar disputed domain names unfairly targets and takes advantage of the Complainant’s trademarks, and as such cannot, in the Panel’s view, be considered to be legitimate noncommercial or fair use under the Policy.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain names. Respondent has not rebutted Complainant’s prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain names such as those enumerated in the Policy or otherwise.

The Panel finds the second element of Policy paragraph 4(a) 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.

In the present case, the Panel notes that Respondent clearly targeted Complainant's marks by using disputed domain names confusingly similar to Complainant's marks to offer – for a fee – services related to the services offered under Complainant's WIKIPEDIA marks. As noted above, the content of several of the websites to which the disputed domain names resolve also make unauthorized use of Complainant's logos and trademarks. These observations apply to the disputed domain names <wikiexpertise.net>, <wikiinnovators.org>, <wikimoderators.net>, <wikipioneer.net>, <wikithinkers.com>, and <wikipioneer.co>.

In the Panel's view, this activity evidences bad faith under Policy paragraph 4(b)(iv) (bad faith is evidenced by "intentionally attempt[ing] to attract, for commercial gain, Internet users to [a respondent's] web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of [a respondent's] web site or location or of a product or service on [a respondent's] web site").

As for the disputed domain names <wikiinnovators.co> and <wikiinnovators.net>, while the use is different, by resolving to PPC websites Respondent has also intentionally attempted to attract Internet users to its websites for commercial gain by creating a likelihood of confusion with Complainant's mark.

Moreover, Respondent (under the registrant name of Kevin Lesnar, Infinity Project Manager), has been found in multiple other UDRP proceedings to be using Complainant's WIKIPEDIA mark in violation of the Policy. *Wikimedia Foundation, Inc. v. Kevin Lesnar, Infinity Project Manager*, WIPO Case No. [D2024-0350](#) (ordering transfer of the disputed domain name <wikipediadrafts.com>); *Wikimedia Foundation, Inc. v. Joseph Lewis, Ecommerce Company; Kevin Lesnar, Infinity Project Manager; Soft Fellow*, WIPO Case No. [D2024-2343](#) (ordering transfer of the disputed domain names <thewikispecialists.com>, <usawikispecialists.com>, <uswikispecialists.com>, <wikidraft.org>, <wikiexpertsguide.com>, <wikiexpertsonline.com>, <wikipediaprofile.com>, <wikispecialists.com> and <wikiwritingservice.com>). This supports a finding of bad faith. See Policy paragraph 4(b)(ii).

In these circumstances, Respondent's failure to submit a response to these proceedings is yet further evidence of bad faith.

The Panel finds that Complainant has established the third element of paragraph 4(a) of the Policy¹.

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 names <wikiexpertise.net>, <wikiinnovators.co>, <wikiinnovators.net>, <wikiinnovators.org>, <wikimastery.co>, <wikimoderators.net>, <wikipioneer.co>, <wikipioneer.net>, and <wikithinkers.com> be transferred to Complainant.

/Jeffrey D. Steinhardt/

Jeffrey D. Steinhardt

Sole Panelist

Date: October 7, 2025

¹In light of the above findings, the Panel finds it unnecessary to address Complainant's allegations and evidence of fraudulent use of the disputed domain names by Respondent.