

## **ADMINISTRATIVE PANEL DECISION**

Anti-Defamation League v. Mrs Clark, Nation of Israel  
Case No. D2025-3119

### **1. The Parties**

The Complainant is Anti-Defamation League, United States of America ("United States"), represented by Fross Zelnick Lehrman & Zissu, PC, United States.

The Respondent is Mrs Clark, Nation of Israel, United States.

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

The disputed domain name <theadl.org> is registered with Tucows Domains Inc. (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 5, 2025. On August 6, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 6, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 12, 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 August 14, 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 August 15, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 4, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 5, 2025.

The Center appointed Evan D. Brown as the sole panelist in this matter on September 12, 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 a non-profit corporation and describes itself as “an anti-hate organization”. It has a particular focus on antisemitism. It owns the trademark ADL, which it uses in connection with various educational and advocacy services and for which it enjoys the benefits of registration, including United States Reg. No. 4,040,512, registered on October 18, 2011. The Complainant also uses a stylized version of its ADL mark – a logo consisting of the letters “ADL” in bold uppercase font. A lighter-colored diagonal band runs across the “A,” and the letters “D” and “L” appear in solid black without additional marks. This mark is also registered in the United States – Reg. No. 5,833,736, registered August 13, 2019. The Complainant’s primary website is at “www.adl.org”.

According to the Whois records, the disputed domain name was registered on April 17, 2023. The Respondent has used the disputed domain name to operate a website that presents itself as the “Anti-Semitism Defense League,” disseminating news, commentary, and resources relating to antisemitism, hosting forums, and promoting activism.

The Respondent uses a logo on its website that is visually similar to the Complainant’s own logo. The Respondent’s logo consists of the bold, uppercase block letters “ADL” and features a lighter-colored diagonal band running across the letter “A,” resembling the stylized design of the Complainant’s logo.

The Complainant asserts that the Respondent is the same party who filed a now-dismissed lawsuit against the Complainant.

#### **5. Parties’ Contentions**

##### **A. Complainant**

The Complainant contends that the disputed domain name is identical or confusingly similar to the Complainant’s trademark; that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and that the disputed domain name was registered and is being used in bad faith.

##### **B. Respondent**

The Respondent did not respond to the Complainant’s contentions.

#### **6. Discussion and Findings**

To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (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 Panel finds that all three of these elements have been met in this case.

##### **A. Identical or Confusingly Similar**

This first element functions primarily as a standing requirement. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”), section 1.7. The Panel must determine

whether the Complainant has rights in a relevant mark, and whether the disputed domain name is identical or confusingly similar to that mark. A registered trademark provides a clear indication that the rights in the mark belong to the Complainant. See *Advance Magazine Publishers Inc., Les Publications Conde Nast S.A. v. Voguechen*, WIPO Case No. [D2014-0657](#). Here, the Complainant has established its rights in the ADL mark by submitting evidence of its trademark registration.

The disputed domain name incorporates the ADL mark in its entirety, with the mere addition of the definite article “the.” This addition does not prevent a finding of confusing similarity. The ADL mark remains clearly recognizable within the disputed domain name, satisfying the requirements for a finding of confusing similarity under the Policy. See [WIPO Overview 3.0](#), section 1.8. Furthermore, it is well established that the Top-Level Domain (in this case, “.org”) is to be disregarded in the confusing similarity analysis. See [WIPO Overview 3.0](#), section 1.11.1.

The Panel therefore finds that the Complainant has established the first element under the Policy.

## **B. Rights or Legitimate Interests**

Under the second element of the Policy, the Complainant must make a prima facie showing that the Respondent lacks rights or legitimate interests in the disputed domain name. Once such a showing is made, the burden of production shifts to the Respondent to demonstrate such rights or legitimate interests. See [WIPO Overview 3.0](#), section 2.1; *AXA SA v. Huade Wang*, WIPO Case No. [D2022-1289](#).

The Complainant asserts that it has never authorized, licensed, or otherwise permitted the Respondent to use its ADL mark in any way, including in connection with the disputed domain name. This is particularly significant given the apparent Parties’ prior litigation history, which reflects a contentious relationship. Furthermore, the Complainant points out that the Respondent does not represent a bona fide business or legitimate organization. The Respondent is not registered as a business in the State of Georgia, United States, which is listed as the jurisdiction in the Respondent’s contact information, nor is there any evidence that the Respondent operates as a registered charitable organization with the Internal Revenue Service. The Complainant therefore argues that the Respondent’s website is not a bona fide commercial or charitable venture, nor does it constitute a legitimate advocacy organization.

The Panel agrees that the Respondent’s use of the disputed domain name cannot be considered to be in connection with a bona fide offering of goods or services if the likelihood is that the disputed domain name was intended to mislead or confuse Internet users as to source or affiliation. In this regard, the Panel notes the similarities between the Complainant’s logos, and the logo displayed on the website at the disputed domain name. This concern is addressed more fully below in relation to the issue of bad faith. See *Welcomemat Services, Inc. v. Michael Plummer Jr., MLP Enterprises Inc.*, WIPO Case No. [D2017-0481](#).

The Respondent has not submitted any response or evidence to rebut the Complainant’s prima facie case. Nor does the record contain any independent indication that the Respondent has rights or legitimate interests in the disputed domain name.

The Panel therefore finds that the Complainant has established the second element under the Policy.

## **C. Registered and Used in Bad Faith**

The final element under the Policy requires the Complainant to establish that the disputed domain name was registered and is being used in bad faith. The Panel finds sufficient evidence of both.

The Respondent’s awareness of the Complainant is readily apparent. The Complainant has asserted – without being contradicted – that the Respondent is the same party who previously initiated a lawsuit against the Complainant, which was ultimately dismissed. That litigation history establishes not only knowledge of the Complainant and its rights, but also a possible motive to engage with the Complainant’s trademark.

The Respondent has used a privacy protection service to obscure its identity in connection with the registration of the disputed domain name. While the use of such a service is not inherently improper, in this case it supports an inference of bad faith in light of the totality of the circumstances.

The Panel further finds that the Respondent has intentionally attempted to attract Internet users to its website by creating a likelihood of confusion with the Complainant's ADL mark. The structure of the disputed domain name, the content of the website, and the Respondent's use of a logo that closely resembles the Complainant's stylized ADL logo all support the conclusion that the Respondent sought to mislead users as to the source, sponsorship, or affiliation of the website.

The Respondent has not submitted any evidence to dispel the logical inference that the disputed domain name was selected precisely because of its association with the Complainant. The use of a nearly identical logo, in particular, strengthens the case that the Respondent sought to create a false association with the Complainant in order to attract users to its site.

Accordingly, the Panel finds that the Complainant has established that the disputed domain name was registered and is being used in bad faith.

## **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 <theadl.org> be transferred to the Complainant.

*/Evan D. Brown/*

**Evan D. Brown**

Sole Panelist

Date: September 26, 2025