

ADMINISTRATIVE PANEL DECISION

Zhang Changjie v. Ana Sofia
Case No. D2025-4151

1. The Parties

The Complainant is Zhang Changjie, Singapore, represented by NLC Law Asia LLC, Singapore.

The Respondent is Ana Sofia, Portugal.

2. The Domain Name and Registrar

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

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 10, 2025. On October 10, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 10, 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 October 21, 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 October 23, 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 October 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 12, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on November 21, 2025.

The Center appointed Andrew D. S. Lothian as the sole panelist in this matter on November 27, 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

According to the Complaint, the Complainant is the sole director of a variable capital company registered in Singapore known as Theme International VCC, which in turn is an umbrella fund holding a sub-fund named Theme International Trading, a quantitative trading firm which provides liquidity and price discovery on various derivative markets. The Complainant is the fund manager and chief executive officer of Theme International Trading, and is also the General Manager and Chief Investment Officer of Bright Point Capital Pte Ltd., which is the fund management company of Theme International Trading.

The Complainant does not have a registered trademark in its personal name, although it claims unregistered trademark rights therein.

An article produced by the Complainant published in "Risk.net" titled "Iron ore house, Asia: Theme International Trading" dated November 16, 2020 provides a profile of Theme International Trading and describes its "impressive trajectory" since its founding in 2019, including the fact that industry acclaim secured it the "Energy Risk Asia" iron ore house of the year award 2020. The Complainant is widely quoted in said article in his capacity as fund manager and lead trader of Theme International Trading. Among other aspects of its business, the Complainant describes the organization's focus as helping the iron ore market to develop, and discusses the organization's investment in algorithmic trading models that allow it to assess absolute and relative values across iron ore products, which the Complainant states gives the organization an edge over market-making rivals.

In addition to the above article, the Complainant produces an extract from the "Home" and "Speakers" page of the Global Investor Group "Trading Singapore" event website, showing that the Complainant had been invited to participate as a speaker for the "Trading Singapore 2023" event, held on September 21, 2023, which is described as "a leading event for the derivatives trading and investment community in the [Asia Pacific] region". On the speaker profile page, the Complainant is described as "Changjie (CJ) Zhang [line break] CEO [line break] Theme International Trading". Although the said site indicates that a speaker profile may be available for the Complainant under a "View Profile" button, the Complainant did not produce this.

The disputed domain name was registered on July 21, 2025. Little is known of the Respondent, which has not participated in the administrative proceeding, other than that it appears to be a private individual with an address in Portugal. The website associated with the disputed domain name reports the terms of private criminal proceedings against the Complainant together with what is said to be the background thereto. The said website goes on to report the fact that the Complainant has continuing roles in the financial sector.

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 it has unregistered trademark rights in its personal name since it began trading in April 2015 (evidence not provided) and started using it constantly for commercial and trade purposes. The Complainant adds that in the course of its business it has been "recognized under [its]

personal name by third parties”, referencing the article and speaking engagement described in the factual background section above. The Complainant submits that this evidence demonstrates third party awareness of its name as an unregistered trademark, adding that the disputed domain name is identical to such mark because it incorporates the Complainant’s personal name in its entirety.

The Complainant contends that it has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name because, first, the Respondent has no history of using or making preparations to use the disputed domain name in connection with a bona fide offering of goods or services, adding that the sole purpose of the website associated with the disputed domain name is to provide a summary of the proceedings concerning the Complainant; secondly, the Respondent is not known by the disputed domain name, due to masking the same via a privacy service; and thirdly, there is no indication that the Respondent is making a legitimate noncommercial or fair use of the disputed domain name, without the intention to tarnish the Respondent’s personal name, adding that the entire purpose of the disputed domain name is to tarnish the Respondent’s personal name because it was registered this year to publish a judgment in a private prosecution almost two years after it was handed down, and asserting that information contained on the website is designed to cast aspersions on the Complainant’s honesty and fitness to have roles within the financial sector.

The Complainant submits that the unregistered trademark rights which it claims for its personal name accrued before the disputed domain name was registered, adding that the disputed domain name was registered and is being used in bad faith because its entire purpose is to tarnish the Complainant’s personal name, and is designed to cast the aspersions noted above.

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 seeks to establish UDRP-relevant rights in its personal name. Personal names that have been registered as trademarks would provide standing for a complainant to file a UDRP case. [WIPO Overview 3.0](#), section 1.5.1. As noted above, however, the Complainant does not have a registered trademark in its personal name. Instead, it asserts unregistered trademark rights therein. In situations where a personal name is being used as a trademark-like identifier in trade or commerce, the Complainant may be able to establish unregistered trademark rights in that name for purposes of standing to file a UDRP case where the name in question is used in commerce as a distinctive identifier of the Complainant’s goods or services. [WIPO Overview 3.0](#), section 1.5.2. Such acquired distinctiveness could be shown by way of relevant evidence such as, for example, (i) the duration and nature of use of the mark, (ii) the amount of sales under the mark, (iii) the nature and extent of advertising using the mark, (iv) the degree of actual public (e.g., consumer, industry, media) recognition, and (v) consumer surveys. [WIPO Overview 3.0](#), section 1.3.

However, merely having a famous name (such as a businessperson or cultural leader who has not demonstrated use of their personal name in a trademark/source-identifying sense), or making broad unsupported assertions regarding the use of such name in trade or commerce, would not likely demonstrate unregistered or common law rights for purposes of standing to file a UDRP complaint. [WIPO Overview 3.0](#), section 1.5.2.

As the panel noted in the recent case of *Kenes Rakishev v. Felix Sater, Regency Capital Group*, WIPO Case No. [D2025-1072](#), “Sections 1.5 and 1.3 of the [WIPO Overview 3.0](#) reflect the consensus view of many panelists expressed in numerous decisions issued under the Policy. The basis of this consensus stems from the nature of trademarks – they are signs that are capable of distinguishing the goods or services offered by one undertaking from the goods or services offered by other undertakings, so there is always a connection between such sign and specific goods or services. If a personal name is not being used to identify particular goods or services offered on the market, this name would not operate as a trademark and there would be no specific goods or services that the public would associate with it.”

The Complainant’s evidence of use of its name in commerce is restricted to the “Risk.net” profile of its business, in which it is named and personally quoted, and the speaking engagement at the “Trading Singapore 2023” event. These do not establish that the Complainant has unregistered trademark rights in its personal name because they do not show that the Complainant offers any goods or services under the Complainant’s personal name or that such name is being used and has become known to the public in a source-identifying sense in relation to any goods and services (*Kenes Rakishev v. Felix Sater, Regency Capital Group, supra*).

Indeed, what the Complainant shows at most is that it is a finance professional and uses its personal name within that profession, in the context of being an officer of the entities described in the factual background section above. This does not establish that the Complainant has unregistered trademarks in its own name (see the recent case *Dr. Sheba Roy v. Bullshit Rates*, WIPO Case No. [D2025-1960](#), which, in addition to its own analysis, also provides a helpful discussion of several other relevant cases under the Policy on this topic. The factual circumstances described in that case, involving a doctor engaged in practice via a healthcare company who also undertook presentations at medical conferences, are broadly analogous to the factual background here).

Following along similar lines to the analysis in *Dr. Sheba Roy v. Bullshit Rates, supra*, the record here establishes that the Complainant offers its services under Theme International Trading, and Bright Point Capital Pte Ltd., not under its personal name. The fact that investors might be attracted to one or other of these entities by virtue of the fact that the Complainant works for them, and/or is personally a prominent figure in its industry, does not mean that the Complainant is using its personal name as a trademark-like identifier. There is no evidence that the Complainant markets or provides goods or services independently of those organizations and under its personal name. Notably, the Complainant’s speaker listing for the Trading Singapore 2023 event and the “Risk.net” article list the Complainant’s personal name in conjunction with the name of the organization which the Complainant is representing in each case.

As the panel’s approach indicates in *Dr. Sheba Roy v. Bullshit Rates, supra*, a presentation at an event of the kind shown in the Complainant’s evidence would at best be seen as an advertisement for the Complainant’s organization, as indeed would the article in “Risk.net”. Neither of these examples present ZHANG CHANGJIE as a trademark for any goods or services. To this it should be added that the Complainant provided no evidence to support its assertion that it had used its personal name as such identifier in respect of goods and services since April 2015, which might have amounted to evidence of the duration and use of said mark. There is likewise no evidence in the record of the amount of any sales under the Complainant’s personal name or public recognition of the name as a mark (as opposed to recognition of the name as that of a person who works for or is an office bearer at the various organizations described in the factual background section above).

For completeness, the Panel adds that the above cases and sections from the [WIPO Overview 3.0](#) are entirely aligned with the case cited by the Complainant on this topic, namely *Victor Topa v. Whoisguard Protected / “Victor Topa”*, WIPO Case No. [D2015-2209](#). This is an older case under the Policy, which refers to the wording of the earlier, version 2.0, iteration of the WIPO Overview on the subject of personal names as trademarks, but nothing turns on this in the matter at hand. In that case, the panel observed that a complainant may be able to establish an unregistered trademark in its personal name for

Policy purposes, noting that providing proof of use of the name as a distinctive identifier of goods or services offered under that name would normally be required. The key part of this observation for present purposes is that the goods or services must be offered “under that name”, i.e., under a complainant's personal name. As noted above, no evidence has been provided in the present case that the Complainant provides any goods or services under its personal name as opposed to under the names of its corporate bodies.

In all of these circumstances, the Complainant has not shown that it has established unregistered trademark rights in its personal name, and accordingly the Panel finds the first element of the Policy has not been established.

B. Rights or Legitimate Interests

Given the Panel's findings above regarding the first element of the Policy, it is unnecessary for the Panel to analyse whether the conditions of the second element of the Policy are established. Nevertheless, in line with *Kenes Rakishev v. Felix Sater, Regency Capital Group, supra*, the Panel notes for completeness that a domain name that is identical to a complainant's trademark carries a high risk of implied affiliation. The terms of section 2.6.2 of the [WIPO Overview 3.0](#) note that even a general right to legitimate criticism does not necessarily extend to registering or using a domain name which is identical to a trademark, and even where such a domain name is used in relation to genuine noncommercial free speech, panels tend to find that this creates an impermissible risk of user confusion through impersonation, which would not support a finding of rights or legitimate interests in a domain name. Had the Complainant been able to establish unregistered trademark rights in its personal name, such mark would have been found to be identical to the disputed domain name, and the Panel would in those circumstances have applied the above analysis to the second element assessment.

C. Registered and Used in Bad Faith

Given the Panel's findings above regarding the first element of the Policy, it is unnecessary for the Panel to analyse whether the conditions of the third element of the Policy are established.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Andrew D. S. Lothian/

Andrew D. S. Lothian

Sole Panelist

Date: December 8, 2025