ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Liquid AI, Inc. v. Sam Sharma
Case No. D2025-5127

1. The Parties

The Complainant is LIQUID AI, INC., United States of America ("United States"), represented by Coates IP LLP, United States.

The Respondents are Sam Sharma and Liquid App, LLC, United States, represented by Allen, Dyer, Doppelt, Milbrath & Gilchrist, P.A., United States.

2. The Domain Name and Registrar

The disputed domain name <liquid.app> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on December 10, 2025. On December 10, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 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 (unknown respondent) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 11, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Respondent sent email communications on December 11, 2025. The Complainant filed an amended Complaint on December 17, 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 December 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 7, 2026. In accordance with paragraph 5(e) of the Rules, the Respondent requested an extension of the Response due date which was granted until January 21, 2026. The Response was filed with the Center on January 21, 2026.

The Center appointed Scott W. Blackmer as the sole panelist in this matter on January 29, 2026. 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.

The Panel issued Procedural Order Numbers 1 and 2 on February 3 and 16, 2026, respectively, asking the Complainant to amend the Complaint to correct the name of the Registrar in question and asking the Respondent about the relationship between Sam Sharma and Liquid App, LLC. The Complainant replied with successive amendments to correct the name of the Registrar and also submitted a supplemental filing regarding the Respondent's identity and control of the disputed domain name. The Respondent replied with a supplemental filing on February 21, 2026. On February 25, 2026, the Complainant submitted an unsolicited supplemental filing, which the Panel has not accepted into the record and has not considered.

4. Factual Background

The Complainant is a corporation established under the laws of the State of Delaware, United States and headquartered in Cambridge, Massachusetts, United States. The Panel notes that the online database of the Delaware Secretary of State shows that the Complainant was incorporated on March 30, 2023.[1]
The Complainant states that it has been providing artificial intelligence ("AI") products and services since December 2023 to help customers use general-purpose AI on data center servers and on edge devices such as smartphones, laptops, embedded systems, and vehicles. The Complainant's chief products are called "Liquid Foundation Models".

The Complainant raised seed money in 2023 from venture funds and obtained additional funding in 2024 led by chipmaker AMD. The Complainant reports that its valuation has been estimated at more than USD 2 billion. Articles attached to the Complaint show that the Complainant attracted media attention as an MIT (Massachusetts Institute of Technology) "spinoff" developing a new approach to AI. An archived screenshot of the Complainant's website at "www.liquid.ai" from December 9, 2023, shows that the Complainant at that time was announcing its development and offering potential users the opportunity to "Join waitlist" and "Get involved". The Complainant's website is now fully operational and advertises the Complainant's products and services. It is headed with the design mark pictured below and the word mark LIQUD.

The Complainant applied to register LIQUID as a word mark in the United States on October 27, 2023, in International Class 9 (Serial Number 98244007) on an "intent to use" basis. According to the database of the United States Patent and Trademark Office ("USPTO"), that application is still pending at the time of this Decision, subject to an opposition filed by Liquid App, LLC (which submitted the Response in the current proceeding). Thus, this application cannot support a UDRP Complaint.

However, the Complainant also has registered marks including the following:

[1] Noting the general powers of a panel articulated in paragraphs 10 and 12 of the Rules, it is commonly accepted that a panel may undertake limited factual research into matters of public record, as the Panel has done in these proceedings. WIPO Overview of WIPO Panel Views on Select UDRP Questions, Third Edition ("WIPO Overview 3.1"), section 4.8.

Mark	Jurisdiction	Reg. Number	Reg. Date	International Class
LIQUID (word)	Singapore	40202407554V	October 24, 2024	9,42
LIQUID (word)	Japan	6908979	March 18, 2025	42
 (Design)	United Kingdom	UK00004047283	July 26, 2024	9.42
 (Design)	European Union	019022497	October 26, 2024	9,42

The design mark appears on the Complainant's website along with the separate LIQUID word mark. The Complainant claims that the design mark is relevant to the bad faith element of the Complaint because of alleged copying by the Respondent, as described below.

The Complainant also claims LIQUID as a common law mark, citing its "Coming Soon" website launched in December 2023 and media reports about investments in the Complainant in 2024 and 2025. However, the Complainant does not offer other foundational evidence such as data concerning sales and advertising under the mark to support its claim of rapidly acquired distinctiveness (see WIPO Overview 3.1, section 1.3).

The disputed domain name was created on July 22, 2022, and is registered to the Respondent Sam Sharma, listing a postal address in the State of Florida, United States and a Proton.me contact email address. It is undisputed that the Respondent Sam Sharma acquired the disputed domain name at auction on November 10, 2025, and remains the registrant of record.

The Response was filed by counsel for Liquid App, LLC ("Liquid App"), a Wyoming (United States) limited liability company. Liquid App states that it is authorized to act on behalf of Mr. Sharma. The Panel notes that the online database of the Wyoming Secretary of State shows that Liquid App was first registered on November 24, 2025. The Panel notes further that Liquid App does not appear to have an online presence using that name. The Response furnishes little information about Liquid App or its role but says only, elliptically, that the disputed domain name was registered to develop a website with a focus on financial services and "has since, with Liquid App, LLC, broadened the scope of financial services that will eventually be available through the <liquid.app> website …".

The Respondent's Supplemental Filing amplifies this narrative with an affidavit from Liquid App's manager Caroline Lizarondo and a copy of the Operating Agreement of Liquid App, explaining that Sam Sharma is not a member or officer of Liquid App but entered into a domain assignment agreement to sell the disputed domain name to Liquid App, which was interrupted by this proceeding. Meanwhile, according to the Lizarondo affidavit, Liquid App took over control of the website associated with the disputed domain name (the "Respondent's website") and began to develop it as a financial services website. Given Liquid App's interest in the disputed domain name and evident control over the associated website, as well as its Response and Supplemental Filing in this proceeding, the Panel refers hereafter to Liquid App and Sam Sharma collectively as "the Respondent" except where otherwise indicated for clarity.

The Respondent's website is headed "Liquid" with a "Coming Soon" notation and the tagline, "Orchestrate liquidity. Maintain control". It offers site visitors the opportunity to "Join Waitlist" for a coming website serving as a platform for a "professional market making platform for token projects", evidently a "non-custodial" cryptocurrency trading platform for "CEX" and "DEX" (centralized cryptocurrency exchanges and decentralized cryptocurrency exchanges, according to Investopedia). The Respondent's website does not identify the website operator other than as "Liquid". The Terms of Service page (dated November 10, 2024) is apparently incomplete and is characterized in a "Disclaimer" as a "starter legal document".

The Complaint attaches a screenshot of an earlier version of the Respondent's website headed with a logo including a design evoking a drop of liquid with three strokes, followed by the word "Liquid" and featuring the tagline, "Trade crypto, gas-free. Truly yours". The logo is similar to the logo heading the Complainant's website and social media sites, which consists of the Complainant's registered word mark and design mark (in some cases the design mark is followed by "Liquid AI" rather than the word "Liquid" alone). The design portion of both logos is evocative of a drop of liquid rendered in three strokes separated by gaps, and these are slightly different between the two logos. In both cases, the word "Liquid" follows in Arial font; in some instances, the Complainant follows that with the abbreviation "AI". The Respondent rendered its logo in white on a black background. The Complainant's logo appears that way in some instances (such as on its YouTube social media site) but otherwise in black design and text on a white or colored background, as shown below. Despite these differences, the overall appearance of the logos is strikingly similar:



Complainant's website logo



Respondent's former website logo

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 its registered LIQUID word mark, which is an arbitrary term with respect to its products and services. The Complainant claims that it has been using the LIQUID mark since December 2023 and has established common law rights in the mark, pre-dating the Respondent's acquisition of the disputed domain name.

The Complainant contends that the Respondent is not commonly known by a corresponding name and asserts that the "only reason" the Respondent would incorporate the term "liquid" in the disputed domain name "is to capitalize on the goodwill of the Complainant's LIQUID Mark".

The Complainant argues that it is "inconceivable" that the Respondent was unaware of the Complainant, pointing to the earlier version of the Respondent's website displaying a design logo similar to the Complainant's as evidence of the Respondent's intention to exploit the Complainant's Liquid mark. The Complainant contends that the Respondent created confusion with the Complainant's mark, advertising "digital wallet services that upon information and belief do not exist". The Complainant infers that the disputed domain name was registered to prevent the Complainant from registering it and to attract Internet users fraudulently in order to dupe them into sharing the login credentials of their digital wallets and/or their login credentials for accounts with the Complainant.

B. Respondent

The Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name.

The Respondent argues that "liquid" is a generic or descriptive term as applied to neural networks and learning algorithms and has opposed the Complainant's application to register LIQUID as a word mark in the United States, as mentioned above. The Respondent also denies that the Complainant's mark is famous or widely known.

The Respondent in any event claims a legitimate interest in using the term for an alternative meaning with respect to financial matters, as something "capable of ready conversion into cash", or the condition of liquidity, which the Respondent considers appropriate for its website focused on digital currency. Moreover, the Respondent observes that while the Respondent Sam Sharma acquired the disputed domain name at public auction in 2025, the disputed domain name had similarly been used from 2019 through 2022 for a financial services website, in that case offering investment management and mobile payment services by a company based in Ghana operating under the name "Liquid". (The Response attaches screenshots of the website formerly associated with the disputed domain name.) Neither that company nor the Respondent offered products or services concerned with artificial intelligence software such as those offered by the Complainant.

The Respondent Liquid App denies prior awareness of the Complainant and any intention of diverting customers from the Complainant or phishing for their log-in credentials or digital wallet credentials. The Respondent Liquid App denies copying the Complainant's logo and states that it removed a "similar" logo from the Respondent's website out of an "abundance of caution" since learning about the Complainant's trademark claims. The Respondent states that it has not yet developed the ability for consumers to create accounts or do anything other than provide their email addresses on a Wait List for the Respondent to contact when services become available. The Respondent asserts that the disputed domain name was purchased "for use in the development of a financial services project and an executory contract was already in place to sell and transfer the [disputed domain name] to the developer of that project before it was blocked" by the Complainant. In its supplemental filing, the Respondent states that its target customer base will not be ecommerce technology companies but "professional managers of cryptocurrency and token portfolios"; hence, it does not target the Complainant's market.

6. Discussion and Findings

6a. Preliminary Matter: Supplemental Filings

Paragraph 10 of the UDRP Rules vests the panel with the authority to determine the admissibility, relevance, materiality and weight of the evidence, and also to conduct the proceedings with due expedition. Unsolicited supplemental filings are generally discouraged, unless specifically requested by the panel. WIPO Overview 3.1, section 4.6.

The Complainant's supplemental filing and the Respondent's reply largely concern facts that are not newly discovered and issues that are not ultimately dispositive, such as the extent to which the Complainant's mark is descriptive and was conceived in advance of its commercial use in 2023. Nevertheless, the Panel accepts these filings as part of the record in this proceeding, as the Complainant was replying to issues raised in the Response, and the Respondent replied to issues raised in the Complainant's supplemental filing and in a procedural order.

6b. Substantive Issues

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 3.1, section 1.7.

The Complainant has shown rights in respect of a trademark or service mark (the LIQUID word mark registered in Japan and Singapore) for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1. Given the registered word marks in these jurisdictions, it is not necessary to determine if and when the Complainant acquired rights in LIQUID as an unregistered mark.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. WIPO Overview 3.1, 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 3.1, 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. Liquid App is not the registrant of the disputed domain name. It was formed two weeks after the disputed domain name was registered, and the Respondent's supplemental filing attaches a signed agreement with the registrant, Sam Sharma, to transfer the disputed domain name to Liquid App on or after February 1, 2026 (due to the 60-day ICANN transfer restrictions policy). That agreement remains executory because the disputed domain name is currently locked during the pendency of this proceeding. The Respondent Liquid App evidently has *de facto* control of the Respondent's website in the interim and purports to speak for the Respondent Sam Sharma in this proceeding, although the record includes no affidavit or declaration by Mr. Sharma reflecting an agreement about the Liquid App's authority on either point. The Response does not advance an argument that Mr. Sharma chose the disputed domain name to reflect the name of Liquid App but argues rather that the name was chosen for its value in describing a financial site.

The Response acknowledges that the associated website has not been used to date to conduct business but only to collect email addresses on a "Wait List", and states that the website is still under development. The Respondent Liquid App does not yet own the disputed domain name, and the record does not reflect steps beyond registering a company name and publishing a "Coming Soon" website with a "Wait List" collecting emails of potentially interested consumers. The record does not include more concrete preparations to do business using the disputed domain name, such as a business plan, advertising, and investment in website development (see WIPO Overview 3.1, section 2.2). The Panel does not find that this amounts to prior commercial use or demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods or services as described in the Policy, paragraph 4(c)(i).

Moreover, the Respondent's claim to a legitimate interest in the descriptive or generic sense of the dictionary term "liquid" must be considered pretextual in light of the apparent targeting of the Complainant's mark, as evidenced by the close similarity of the logo displayed until recently on the Respondent's website. See WIPO Overview 3.1. section 2.10.1. The facts concerning this issue are more closely examined in the following section.

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 it is undisputed that the Respondent acquired the disputed domain name in November 2025, after the Complainant had acquired registered trademark rights in the LIQUID word mark and substantial publicity surrounding its novel AI products and investment in the Complainant by information industry giants such as AMD and Shopify, not only online in industry publications such as *TechCrunch* and *Wired* but also in mainstream and business media such as *The Wall Street Journal, The Boston Globe, Axios, Inc., and VentureBeat*. Shortly after, Liquid App was formed and the Respondent's pro-forma website was published as "Coming Soon", to be developed as a highly technical financial services website that could take advantage of a name that was gaining notoriety in a "hot" new information technology sector.

The Response denies that the "Respondent" had knowledge of the Complainant and its marks when registering the disputed domain name, and the Respondent's Supplemental Filing explicitly states that Liquid App was unaware of the Complainant until receiving notice of the Complaint from Sam Sharma. But there is reason to doubt. The record does not include a signed statement of any kind from the registrant Sam Sharma, and Liquid App did not exist when the disputed domain name was registered. Given the striking similarity of the logo initially featured on the Respondent's website to the logo heading the Complainant's website and social media sites, as well as the publicity surrounding the Complainant at that time, the Panel considers it more likely than not that Sam Sharma, at least, meant to exploit the "high tech" reputation associated with the Complainant in posting a website promising an upcoming financial technology platform. This accords with the example of bad faith found in the Policy, paragraph 4(b)(iv), intentionally attempting to attract Internet users to a site for commercial gain by creating a likelihood of confusion with the Complainant's mark. The most charitable reading of the record is that the Respondent Liquid App was not initially aware of this intent when it entered into an agreement with Sam Sharma, began further development of the website, and then hired counsel and tried to limit the damage when the Complainant was filed. But the Respondent Liquid App is not the registrant of the disputed domain name, and the Panel must render a decision based on the factual and legal circumstances that prevail at the time of the proceeding. On this record, the Panel finds that the Respondent registered and used the disputed domain name in bad faith, in an effort to exploit the Complainant's LIQUID mark.

Panels have held that the use of a domain name for illegitimate or illegal activity (here, claimed to be phishing for consumer email addresses) constitutes bad faith. WIPO Overview 3.1, section 3.4. The Complainant suggests that this is involved in the current proceeding, but there is no actual evidence of such activity, and this case differs from those in which such findings have been entered in the absence of a response, where registrants have taken pains to avoid identification or there are other facts corroborating a likely fraud or phishing scheme. Therefore, the Panel declines to enter such a finding here.

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 <liquid.app> be transferred to the Complainant.

/W. Scott Blackmer/
W. Scott Blackmer
Sole Panelist
Date: March 2, 2026