

ADMINISTRATIVE PANEL DECISION

GPTZero, Inc. v. jiaying quan

Case No. D2026-0848

1. The Parties

The Complainant is GPTZero, Inc., United States of America (“United States”), represented by Neal & McDevitt, LLC, United States.

The Respondent is jiaying quan, China, self-represented.

2. The Domain Name and Registrar

The disputed domain name <gptzero.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 February 26, 2026. On February 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 27, 2026, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 3, 2026, 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 March 4, 2026.

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 March 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 31, 2026. The Respondent sent an email communication to the Center on March 11, 2026, and requested an automatic four-day extension of Response due date. In accordance with paragraph 5(b) of the Rules, the Response due date was extended to April 4, 2026. The Response was filed with the Center on March 31, 2026.

The Center appointed Steven A. Maier as the sole panelist in this matter on April 14, 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.

4. Factual Background

The Complainant is a company engaged in the provision of AI detection and content authenticity tools. It has operated since early 2023 and maintains a principal website at “www.gptzero.me”.

The Complainant does not rely on any registered trademark rights. However, it submits that it has obtained unregistered or common law rights in the mark GPTZERO in the circumstances that are considered below.

The disputed domain name was registered on November 29, 2024. It has resolved to a website offering AI content detection services.

5. Parties’ Contentions

A. Complainant

The Complainant submits that it has continuously offered services under the mark GPTZERO since January 2023, providing tools designed to detect AI-generated text, analyze authorship, and assist educators, institutions and professionals in evaluating written content.

The Complainant contends that the mark GPTZERO has become a distinctive identifier of its services by virtue of several matters. It submits in particular that:

- its services are offered globally via the Internet, and that its website receives millions of visitors per month, including 15 million in December 2025;

- it has generated substantial multi-million dollar revenues from services provided under the mark;

- it invests tens of thousands of dollars per month in digital advertising and active brand promotion across major online platforms;

- it maintains an established and widely-followed presence on social media (it exhibits a profile page from what appears to be the X platform);

- it has received widespread media attention from publications and outlets including Tech Crunch, CNN Business, the BBC, The New York Times, The Washington Post and Business Insider. It exhibits examples including:

- (i) an article from CNN Business (undated, but apparently from February 2, 2023¹), stating: “The powerful AI tool ChatGPT is already raising concerns that the technology could encourage cheating and help pass off a few seconds at the keyboard as hours of research and writing. 22-year-old Princeton University student Edward Tian developed an app called GPTZero for detecting AI-generated text. He joins CNN’s Anderson Cooper to explain how it works”; and

- (ii) an article from Business Insider dated July 28, 2023, headed: “How a 23-year-old college student built one of the leading AI detection tools.” The article goes on to say that the company had raised USD 3.5 million in VC funding.

¹ Noting in particular the general powers of a panel articulated inter alia in paragraphs 10 and 12 of the UDRP Rules, it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision, in particular to affirm or corroborate a party’s contention (section 4.8 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”).

The Complainant submits that the matters referred to above are sufficient to establish that the mark GPTZERO has become a distinctive identifier that consumers associate with the Complainant's services, and that it has gained a secondary meaning in that respect. It contends that it is not uncommon for popular online business to develop a substantial business reputation in a short time, and that this has been recognized by panels under the UDRP in assessing unregistered trademark rights (e.g. *SundaeSwap Labs, Inc. v. Cerci*, WIPO Case No. [D2022-1049](#)).

The Complainant contends that the disputed domain name is identical to its [unregistered] GPTZERO trademark. It states that the disputed domain name exactly replicates that mark, subject only to the addition of the Top-Level Domain ("TLD"), which is to be disregarded for the purposes of the first element under the Policy.

The Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It states that it has no relationship with the Respondent and has never authorized it to use its GPTZERO trademark, that the Respondent has not commonly been known by the disputed domain name, and that the Respondent is making neither bona fide commercial use nor legitimate noncommercial or fair use of the disputed domain name. The Complainant contends, in particular, that the Respondent is using the disputed domain name solely for the purpose of passing off its website as being that of the Complainant, which cannot give rise to rights or legitimate interests on the Respondent's part.

The Complainant submits that the disputed domain name was registered and is being used in bad faith. It states that, by the time the Respondent registered the disputed domain name in 2024, the GPTZERO trademark had already acquired substantial distinctives in connection with AI content detection services. The Complainant contends that it is not credible in these circumstances that the Respondent was unaware of the Complainant's trademark and arrived independently at the disputed domain name.

The Complainant submits, further, that the Respondent has targeted the Complainant and its business model. It states that the Respondent has used the disputed domain name to offer AI content detection services which directly mirror the services offered by the Complainant. It adds that the Respondent's website is strikingly similar to the Complainant's website in several respects, including the following:

- the Complainant's website displays a logo and the name GPTZero in the top left-hand corner, which name and formulation also appear on the Respondent's website;
- the Complainant's website introduces itself as an "AI detector", and the Respondent's website, similarly, as an "AI Content Detector";
- the Complainant's website includes a text input tool on the right-hand side of the homepage, which is again closely replicated on the Respondent's website; and
- the Respondent's website otherwise follows a similar layout, structure and progression to the Complainant's website, including feature descriptions, explanations of how the service works, testimonials, pricing plans and frequently asked questions.

The Complainant contends that other aspects of the Respondent's website cast further doubt on its good faith. It states, in particular, that the Respondent's claims to be trusted by well-known universities including Harvard, Stanford, MIT and Oxford, to have over one million active users, and to maintain a 99% accuracy rate, are implausible on their face and presented without substantiation.

The Complainant submits, in summary, that the Respondent has used the disputed domain name to intentionally attempt to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark.

The Complainant requests the transfer of the disputed domain name.

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.

First, the Respondent denies that the Complainant has obtained unregistered or common law trademark rights in respect of the GPTZERO mark. It provides evidence that the Complainant has made two applications for United States registrations for the mark GPTZERO (serial numbers 98340508 and 98340514, both filed on January 2, 2024), both of which appear to have been marked “case suspended” since October 2024. The Respondent submits that the longstanding refusal of these trademark registrations confirms that the term “gptzero” is merely descriptive or generic within the industry.

The Respondent points out that the social media homepage exhibited by the Complainant refers to only 1,816 followers, which the Respondent submits does not support a claim that the term “gptzero” had acquired a secondary meaning distinctive of the Complainant.

The Respondent contends that it is a legitimate developer of AI platforms, having initially operated as WriteGo.ai. It states that the registration of the disputed domain name was a natural expansion of its business activities, driven by existing user demand. It states that its product includes advanced, independent features, such as multi-model analysis, which differentiate it from the Complainant’s basic offerings.

The Respondent submits that the citations of various universities in its “Trusted By” section is based on genuine user verifications. It exhibits what it claims to be a backend list of user accounts, all in the format “[...]@harvard.edu”, with creation dates between March and April 2025.

The Respondent states that its “creative inspiration” in registering the disputed domain name was not the Complainant, but instead ZeroGPT.com, which it states was the clear industry leader at the date it registered the disputed domain name. It exhibits comparative data, apparently showing that, as of December 2025, the website “www.zerogpt.com” commanded a higher level of traffic than the Complainant’s website, “www.gptzero.me”.

The Respondent includes in its exhibits screenprints from websites operated by “ZeroGPT” and “Originality.ai”. The Respondent states that these websites are operated by AI detection competitors, and illustrate that it is the industry standard to include a text input box on the relevant landing page.

The Respondent submits that, immediately upon becoming aware of this dispute, it initiated a brand transition to <gptzeropro.com> and posted a clear notice on the website at the disputed domain name to prevent any potential confusion. It exhibits a banner stating: “For a better user experience, we’ve launched an upgraded Pro version with a limited-time offer” (although the original website appears otherwise to remain in place). The Respondent contends that this action constituted “good faith mitigation” on its part.

6. Discussion and Findings

In order to succeed in the Complaint, the Complainant is required to show that all three of the elements set out under paragraph 4(a) of the Policy are present. Those elements are that:

- (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.

A. Identical or Confusingly Similar

The Complainant's case under the first element rests entirely on its claim to have acquired unregistered or common law trademark rights in the mark GPTZERO.

As stated in section 1.3 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)):

"To establish unregistered or common law trademark rights for purposes of the UDRP, the complainant must show that its mark has become a distinctive identifier which consumers associate with the complainant's goods and/or services.

Relevant evidence demonstrating such acquired distinctiveness (also referred to as secondary meaning) includes a range of factors such as (i) the duration and nature of the use of the mark (which may include social media presence and engagement), (ii) the amount of sales under the mark and during which time period, (iii) the nature and extent of advertising using the mark – including evidence of expenditures over a relevant time period, (iv) the degree of actual public (e.g., consumer, industry such as trade and professional associations, media) recognition, and (v) consumer surveys. The fact that a respondent is shown to have been targeting the complainant's mark (e.g., based on the manner in which the mark is used on the related website or impersonating documents or other instruments) may also support the complainant's assertion and evidence that its mark has achieved significance as a source identifier.

[...]

Specific evidence including for example documented evidence of figures relating to sales, marketing, and/or social media endorsements supporting assertions of acquired distinctiveness should be included in the complaint; conclusory allegations of unregistered or common law rights, even if undisputed in the particular UDRP case, would not normally suffice to show secondary meaning."

The Panel finds the Complainant's evidence in support of the factors mentioned above to be of limited effect. While it claims to have earned "substantial multi-million dollar revenues", it provides no evidence in support of this statement, or of its claim to spend tens of thousands of dollars per month on advertising. Similarly, while claiming up to 15 million website visitors per month, this claim is in no way documented. Insofar as it exhibits its account page from the X platform, the Panel agrees with the Respondent's submission that a total of 1,816 followers does not of itself evidence widespread reputation or recognition.

The media coverage exhibited by the Complainant is somewhat more persuasive in the Panel's view, suggesting at least that the Complainant's concept was somewhat innovative in early 2023 and gained some degree of coverage in both technology-related and more general media. That evidence also suggests that the Complainant obtained USD 3.5 million by way of initial VC funding, which its website states now stands at USD 13.5 million. The Panel notes that the Complainant's website also claims 17 million users, including one million educators.

The Panel also finds this to be case in which the Respondent's targeting of the Complainant's trademark supports the Complainant's claim to have obtained unregistered trademark rights. The reasons for the Panel's conclusions in this regard are set out further below.

The Panel notes that the Complainant's applications for United States registrations for the mark GPTZERO appear to have been suspended for a considerable period, and understands the Respondent's speculation that this may relate to the descriptive nature of the mark or its constituent elements. However, there appears to be insufficient further information available to draw any firm conclusions as to the reasons for suspension, or indeed the implications of such suspension for the Complainant's claim to have obtained unregistered trademark rights.

In these circumstances, and noting also that the first element under the Policy represents a standing or threshold requirement (i.e. sufficient basis for a complainant properly to initiate a claim), the Panel is prepared to find, principally on the basis of its Internet presence and media coverage, that the Complainant

has established common law or unregistered trademark rights in the mark GPTZERO for the purposes of the first element of the Policy.

The disputed domain name is identical to the Complainant's trademark GPTZERO, ignoring the TLD ".app" which may be disregarded for the purpose of comparison. The Panel therefore finds that the first element under the Policy is 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 that 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.

In this case, the Respondent has come forward with submissions that it operates a legitimate and independent business under the disputed domain name, which it registered without any intention of targeting the Complainant's trademark rights.

In assessing the credibility of the Respondent's claim, it is necessary first to examine the nature of the disputed domain name. This consists of two elements, the first of which is the abbreviation "gpt", meaning "Generative Pre-trained Transformer", which is a term in relatively common usage by a number of parties within the AI sector (although it was initially coined by OpenAI in connection with its ChatGPT product). The second element of the trademark is the dictionary term "zero". Where a domain name combines an abbreviation in general usage with a dictionary word, this raises the possibility that a respondent may have alighted upon that name independently and without intent to target a corresponding trademark owner's rights. However, the further questions that rise in that regard include whether the combination of terms in question is internally coherent, and/or results in a name that accords with the Respondent's explanation.

Here, the Respondent has offered no specific explanation for the combination of the terms "gpt" and "zero", save to say that the terms are descriptive within the sector, and that its "creative inspiration" was the name "ZeroGPT.com", as opposed to the Complainant's trademark. Nor does the Panel consider that combination of the terms "gpt" and "zero" gives rise to any obvious descriptive meaning. Balancing against this the fact that the disputed domain name is identical to the Complainant's GPTZERO trademark (together with other factors as discussed under the third element, below) the Panel finds on balance that the Respondent is more likely to have registered the disputed domain name in order to target the Complainant's trademark than for any genuinely independent reason.

Insofar as the Respondent has produced evidence of a number of user accounts linked to the <harvard.edu> domain, the Panel finds this to be a neutral point. To the extent that the relevant Internet users may have been drawn to the Respondent's website under the misleading impression that it was that of the Complainant, then the fact that the Respondent may have obtained those users as customers does not assist it.

The registration of a domain name for the purpose of targeting third party trademark rights cannot give rise to rights or legitimate interests on the part of a respondent, and the Panel therefore finds that second element under the policy is established.

C. Registered and Used in Bad Faith

As observed in connection with the second element above, the Panel does not find the disputed domain name to convey any obvious descriptive meaning, or to accord with any explanation provided by the Respondent for the combination of its constituent terms. The disputed domain name is, moreover, identical to the Complainant's trademark, which the Panel finds to be somewhat distinctive in nature, notwithstanding its combination of an abbreviation in general usage with a dictionary term.

In order to establish the third element under the Policy, the Complainant must establish that the Respondent was aware of the Complainant's trademark in question, and registered the disputed domain name in order to take unfair advantage of that mark. Here, the Respondent contends that it was not motivated by the Complainant's trademark, but drew its "creative inspiration" from another competitor, ZeroGPT.com, which it claims to have been better-known than the Complainant at the date the disputed domain name was registered.

While the Respondent must be shown to have targeted the Complainant's, as opposed to any other party's trademark, the Panel finds the Respondent's submission to be unavailing. The Panel is satisfied that the Complainant had been trading for almost two years by the time the disputed domain name was registered in November 2024, and had by then established a substantial Internet presence, as well as having obtained a degree of media attention both in the technology sector and more widely. The Panel does not therefore accept that the Respondent was aware of the ZeroGPT.com business, but apparently not the Complainant, particularly in circumstances where the Respondent was operating in precisely the same, relatively narrow, AI detection sector. Given that the Respondent was aware of the ZeroGPT.com business, then the Panel finds it highly likely that it was also aware of the Complainant.

Furthermore, the Panel finds the Respondent to have used the disputed domain name in a misleading manner, calculated to cause confusion with the Complainant and its website. The Respondent's homepage opens with a small logo and the name "GPTZero", being precisely the same name and formulation as that used by the Complainant. The layout, content and structure of the websites are also more similar, in the Panel's view, than could be explained either by coincidence or industry standard: while it may be true, for example, that AI detection websites generally include a text input panel, neither of the examples advanced by the Respondent follows the same top right positioning of the panel as appears on both the Complainant's and the Respondent's homepages.

As to the Respondent's claim of "good faith mitigation" by changing its name to <gptzeropro.com>, the Panel finds this to be more consistent with a doubling-down on the Respondent's misleading actions than with any indication of good faith. If the Respondent genuinely wished to promote an independent AI detection business without intention to target the Complainant, then it has provided no explanation for its repeated references to the Complainant's GPTZERO trademark, as opposed to using an unconnected name. The Panel finds the addition of the further term "pro" in <gptzeropro.com> to be more suggestive of an enhancement to the Complainant's product than any independent product, and the Panel also notes that the Respondent's additions to its website, supposedly to prevent confusion, do not appear to have included any form of effective disclaimer.

The Panel concludes accordingly, on the balance of probabilities, that the Respondent registered and has used the disputed domain name in the knowledge of the Complainant's GPTZERO trademark and with the intention of benefitting unfairly from the Complainant's goodwill attaching to that mark. The Panel finds, in particular, by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of its website or of a product or service on its website (paragraph 4(b)(iv) of the Policy).

The third element under the Policy is therefore satisfied.

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 <gptzero.app> be transferred to the Complainant.

/Steven A. Maier/

Steven A. Maier

Sole Panelist

Date: April 28, 2026