

## **ADMINISTRATIVE PANEL DECISION**

Karen Roter Davis v. wilson wijaya

Case No. D2026-1435

### **1. The Parties**

The Complainant is Karen Roter Davis, United States of America (“United States”), internally represented.

The Respondent is wilson wijaya, Indonesia.

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

The disputed domain name <karenroterdavis.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 April 2, 2026. On April 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 8, 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 (Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 8, 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 April 9, 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 April 14, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 4, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 5, 2026.

The Center appointed Assen Alexiev as the sole panelist in this matter on May 8, 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 Karen Roter Davis is a physical person. She has served as Director of Early Stage Projects at X (Alphabet), Board Director at Shift4 Payments, Inc., and Adjunct Professor at Northwestern University's Medill School. The Complainant currently is a Managing Partner of Entrada Ventures.

The disputed domain name was initially registered on July 12, 2007 by the Complainant. In 2021, its registration lapsed, and the disputed domain name was acquired by the Respondent at a public auction for expired domain names. The disputed domain name currently resolves to a website that features various unrelated and uncategorised articles. The website also includes various links to third-party websites, including to gambling-related resources.

#### **5. Parties' Contentions**

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

The Complainant submits that she registered the disputed domain name on July 12, 2007, and used it continuously for 14 years for her professional personal website and blog. In July 2021, the Complainant inadvertently failed to renew the registration of the disputed domain name, and it was acquired by the Respondent in August 2021 through GoDaddy's expired-domain auction process. Immediately following the acquisition, the hosting infrastructure for the disputed domain name was changed three times in five days. The Complainant notes that the disputed domain name currently operates as a template-driven content farm populated with unrelated articles attributed to "adminwp", published at regular five-day intervals using an automated template, almost entirely organised under the catch-all label "Uncategorised", and accompanied by site-wide advertising blocks linking to numerous third-party gambling-related destinations. The Complainant adds that the associated website also contains direct casino/gambling articles and Indonesian pharmaceutical footer-link spam, which according to her indicates a template-level monetisation and broader SEO-spam use.

The Complainant maintains that the disputed domain name is identical to her personal name Karen Roter Davis. The Complainant asserts common law trademark rights in her personal name, and claims that she has used it continuously as a source identifier for her professional activities for over two decades.

The Complainant states that her common law rights derive specifically from her independent commercial activities under her own name, including publishing, fund management, teaching, and professional speaking. The Complainant submits that her name recognition is not derivative of any single corporate brand or employer, and she has used "Karen Roter Davis" as a source identifier consistently in several independent professional contexts for more than two decades.

The Complainant notes that she has held senior roles at prominent companies, including Director of Early Stage Projects at X (Alphabet) and Board Director at Shift4 Payments, Inc. (NYSE: FOUR), where she is identified by her full name in SEC proxy filings. The Complainant further states that she is Managing Partner of Entrada Ventures, an early-stage venture capital fund investing in B2B software and deep tech companies, and that she is publicly identified by her full name on the firm's website and in media coverage of the fund. According to the Complainant, her name is the commercial identifier through which the fund markets its services to founders and limited partners.

The Complainant points out that she has published bylined articles in media outlets including TIME Magazine (January 2016 and March 2016) and the Huffington Post, where she is identified as "Karen Roter Davis", and that she maintains a contributor page on HuffPost under her name. A 2016 TIME article carries the editorial note "This article originally appeared on Karen's blog", referring to content that was hosted at the disputed domain name during its ownership by the Complainant. The Complainant adds that she has also maintained a professional blog on Medium and published articles on LinkedIn under her personal name.

The Complainant also states that she has served as Adjunct Professor at Northwestern University's Medill School and has been a featured speaker at Princeton University events, including the "She Roars" conference. According to the Complainant, these engagements constitute a direct commercial use of her name as a source identifier for professional services.

The Complainant further states that the disputed domain name was her professional identifier for 14 years, when it functioned as the central identifier linking the Complainant's name to her published work and professional services. Readers of her published work were directed to the disputed domain name, reinforcing the association between her personal name and a specific source of content and professional services. A LinkedIn article published by the Complainant in May 2015 directed readers to "www.karenroterdavis.com."

The Complainant states that the acquired distinctiveness of her name is confirmed by Internet searches for "Karen Roter Davis", which return more than 50 consecutive results relating to her publications, board service, fund management, and professional activities. The Complainant notes that no other individual uses the same name in any publicly-visible capacity.

According to the Complainant, the Respondent's acquisition and use of the disputed domain name, which is identical to her personal name and has no independent meaning, confirms targeting and further supports the conclusion that the name KAREN ROTER DAVIS functions as a distinctive source identifier.

The Complainant asserts that Respondent has no rights or legitimate interests in the disputed domain name. The Complainant submits that the disputed domain name is identical to the Complainant's personal-name mark, which creates a high risk of implied affiliation.

The Complainant maintains that the Respondent is not commonly known by the disputed domain name and is not using it for any bona fide offering of goods or services. Instead, the disputed domain name hosts spam and gambling content, which is an intentional commercial exploitation rather than legitimate use tied to the name Karen Roter Davis. The Complainant notes in this regard that the use of a domain name to host advertising links is not a bona fide offering of goods or services where such links capitalise on the reputation and goodwill of the Complainant's mark or otherwise mislead Internet users. The Complainant adds that "karenroterdavis" is not a dictionary word or a common phrase, but an individual's distinctive full name with no meaning independent of the Complainant.

The Complainant states that the content available at the disputed domain name is not criticism, commentary, news, or any other form of a legitimate noncommercial use. Rather, it is a spam-like content deployed for the apparent purpose of generating commercial value through advertising links, affiliate-style linking, and search-ranking manipulation. The Complainant adds that the disputed domain name shares hosting infrastructure with numerous gambling and spam domain names containing terms such as "bet," "casino," "slot", and "gaming." According to the Complainant, this infrastructure profile is consistent with participation in a broader monetised or link-spam network.

The Complainant contends that the disputed domain name was registered and is being used in bad faith. The Complainant submits that she already had an established professional recognition under her name and had used the disputed domain name as a central professional identifier at the time of the acquisition of the disputed domain name by the Respondent on August 23, 2021, which according to the Complainant is the relevant registration date for purposes of the third element of the Policy. The Complainant notes that a basic Internet search for "Karen Roter Davis" at that time would have revealed the Complainant's published work, board appointments, and prior association with the disputed domain name.

According to the Complainant, "Karen Roter Davis" is a distinctive personal name with no plausible value independent of its association with the Complainant and no independent "brandable" value. Unlike dictionary terms or common phrases, such domain name would typically be valued only for its association with the Complainant, making it implausible that the Respondent selected the disputed domain name without regard to that association.

The Complainant adds that an unrelated entity identified as “hengheng” has no plausible reason to acquire a “.com” domain name corresponding to the three-part personal name of an American professional, except to exploit the prior association of such domain name with that person.

The Complainant points out that the disputed domain name is currently used as a content farm populated with gambling advertising, Indonesian pharmaceutical spam, and keyword-targeted SEO articles, which exploits its association with Complainant to attract Internet users to unrelated commercial content. The Complainant adds that the Respondent cannot disclaim responsibility for such content even if it is generated by third parties and even if the Respondent does not derive direct profit from it. According to the Complainant, the combination of long-standing prior use by the Complainant, acquisition shortly after lapse of its registration, and immediate deployment for monetised content supports a finding of opportunistic bad faith registration and use of the disputed domain name.

The Complainant notes that she has attempted for several years to engage with the registrant of the disputed domain name through broker services, but received no response.

## **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 Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 1.7.

The Complainant does not have a registered trademark. She claims having unregistered trademark rights in her personal name Karen Roter Davis.

As discussed in section 1.3 of the [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.

The claimed mark must also be used as a source identifier of goods or services e.g., on a website or on products or packaging used in commerce, provided that the mark, as used, is linked to the goods or services that are being branded with the mark; this may include use by the complainant on letterhead or invoices or email headers and signatures.

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.

As further discussed in section 1.5.2 of the [WIPO Overview 3.1](#), the UDRP does not explicitly provide standing for personal names that are not registered or otherwise protected as trademarks. Where a personal name is being used as a trademark (i.e., as a source-identifier in trade or commerce), the complainant may be able to establish unregistered or common law rights in the name for purposes of standing to file a UDRP case where the name is used in commerce as a distinctive identifier of the complainant's goods or services.

Merely having a famous name (such as a business person or cultural/political leader who has not demonstrated use of their personal name in a trademark/source-identifying sense), or authoring an article or giving a speech, 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.

Even in cases where the domain name and website content clearly target the personal name, this may not be enough to overcome a lack of specific evidence of use of the name as a distinctive source identifier.

Sections 1.3 and 1.5.2 of the [WIPO Overview 3.1](#) 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 types of goods or services. If a personal name is not being used to identify a certain type of goods or services offered on the market, this name would not operate as a trademark and there would be no concrete types of goods or services that the public would associate with it.

In support of her claim of having common law trademark rights in her personal name, the Complainant has provided evidence that she has served as board member, director, or managing partner of several prominent companies. The holding of these positions however does not per se mean that the Complainant has provided goods or services under her own name, but rather that she has contributed to the business activities of these companies that they have carried out under their own names and trademarks. There is no evidence in support of the Complainant's allegation that her name has been the commercial identifier through which any of these companies has marketed its goods or services.

The Complainant also states that she has held an academic position in a university, has given speeches at popular events, and that she maintains a professional blog, but such activities are not commercial in nature. The Complainant has demonstrated that she is the author of several articles included in well-known magazines and websites, but the indication of her name as the author of these articles does not per se constitute use of a mark in relation to goods or services. The Complainant states that she has maintained the disputed domain name for 14 years and has used it for her own website and blog, but there is no evidence that the disputed domain name has been used for the offering of any goods or services.

The Complainant has not provided any evidence as to any sales under the claimed mark and their amount or about the nature and extent of advertising using it; there is no evidence as to the degree of actual recognition of the trademark by the public, and no consumer surveys. Taken together, the evidence submitted by the Complainant does not show that her name has been used in a trademark/source-identifying sense and has acquired a secondary meaning for consumers, and is insufficient to establish unregistered trademark rights in it.

On this basis, the Panel finds that the Complainant has failed to establish that she has unregistered trademark rights in her name. Therefore, the Complainant does not have standing to file the Complaint, and the same must fail.

## **B. Rights or Legitimate Interests and Bad Faith**

Since the Complainant has failed to establish the first element of the test under the Policy, there is no need to address the other elements. Nevertheless, the Panel considers it important to make some comments on the Respondent's conduct.

The Panel notes that the disputed domain name is identical to the Complainant's personal name and carries a high risk of implied affiliation with her. It resolves to a website displaying gambling-related online resources, which suggests that it is being used for commercial gain. The Respondent has not submitted a Response and has not disputed any of the allegations or evidence included in the Complaint. It has not provided any plausible explanation why it has chosen to acquire and how it intends to use the disputed domain name. This combination of circumstances supports a conclusion that the Respondent does not have rights or legitimate interests in the disputed domain name and that it has registered and used it in a bad faith attempt to confuse and attract Internet users to the associated website for commercial gain. However, for the reasons discussed above, this activity of the Respondent is insufficient on its own for the Complainant to satisfy her burden under the Policy.

## **7. Decision**

For the foregoing reasons, the Complaint is denied.

*/Assen Alexiev/*

**Assen Alexiev**

Sole Panelist

Date: May 22, 2026