

ADMINISTRATIVE Panel DECISION

Sea Change Foundation v. juan zepeda, [...]@gmail.com
Case No. D2026-1613

1. The Parties

Complainant is Sea Change Foundation, United States of America (“United States”), represented by Sideman & Bancroft, LLP, United States.

Respondent is juan zepeda, [...]@gmail.com, United States.

2. The Domain Name and Registrar

The disputed domain name <seachangefound.com> (hereinafter “Disputed Domain Name”) 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 April 16, 2026. On April 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On April 16, 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 (Registrant Unknown, Contact Privacy Inc. Customer 0177879533) and contact information in the Complaint. The Center sent an email communication to Complainant on April 17, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on April 23, 2026.

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 Respondent of the Complaint, and the proceedings commenced on April 24, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 14, 2026. Respondent sent an email communication to the Center on April 23, 2026.

The Center appointed Lawrence K. Nodine as the sole panelist in this matter on May 28, 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

Complainant is a nonprofit organization supports engaged in climate change advocacy and other global environmental challenges. Founded in 2006, Complainant operates internationally and provides funding and strategic support for programs focused on climate policy, clean energy, and environmental protection.

Complainant has used the SEA CHANGE FOUNDATION (hereinafter the “Mark”) as a trademark in United States commerce continuously since at least January 24, 2008. Complainant owns several registrations for the Mark, including Registration Nos. 3,558,227 (registered January 6, 2009), 7,648,926 (registered January 14, 2025).

Complainant owns and operates the domain name <seachange.org>, which it uses as its primary website. Complainant also owns <seachangefoundation.com>, which redirects to <seachange.org>. Complainant’s employees use email addresses formatted as user@seachange.org.

The Disputed Domain Name was registered on March 27, 2026. The associated website prominently displays the Mark throughout, including in the header, footer, and main content on the site. The site also reproduces, nearly verbatim, text from Complainant’s official website, including material from the homepage and “About” page. Respondent’s website lists Complainant’s telephone number in the contact information section. In addition, the footer of Respondent’s website lists the address of Complainant’s legal counsel, which is publicly available through the United States Patent and Trademark Office’s records for Complainant’s trademark registrations.

On April 3, 2026 and April 4, 2026, less than a week after the Disputed Domain Name was registered, a third party—Verizon Business—sent a letter Complainant’s legal counsel¹ that disclosed that an email address based on the Disputed Domain Name had been used to make significant changes to a Verizon account associated with an individual who was not related or known to Complainant or its counsel.. The notice indicated that multiple account modifications had occurred, including changes to account login credentials, authentication settings, and account access information. These changes were made on March 30, 2026, three days after the Disputed Domain Name was registered.

5. Parties’ Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Disputed Domain Name.

Notably, Complainant contends that Respondent’s conduct reflects a pattern of impersonation, misuse of Complainant’s identity and website content, and activity consistent with deceptive or fraudulent use of the Disputed Domain Name. The Disputed Domain Name has been used to mimic Complainant and create a false impression of affiliation. The website to which the Disputed Domain Name resolves contains copies of Complainant’s content and prominently features the Mark, creating the impression that it is connected to Complainant. Respondent’s use in this fashion is an attempt to pass itself off as Complainant.

¹ As reflected in the publicly accessible United States Patent and Trademark Office database.

B. Respondent

Respondent did not respond officially to the Complaint. However, Respondent sent an email to the Center on April 23, 2026, stating “I have not made any complaints regarding this domain?”

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 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.

Complainant has shown rights in respect of a trademark or service Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the Mark is recognizable within the Disputed Domain Name. Accordingly, the Disputed Domain Name is confusingly similar 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 Respondent may demonstrate rights or legitimate interests in a Disputed Domain Name.

Although the overall burden of proof in UDRP proceedings is on 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 Respondent. As such, where a complainant makes out a prima facie case that Respondent lacks rights or legitimate interests, the burden of production on this element shifts to Respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on Complainant). If Respondent fails to come forward with such relevant evidence, Complainant is deemed to have satisfied the second element. [WIPO Overview 3.1](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Disputed Domain Name. Respondent has not rebutted Complainant’s prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the Disputed Domain Name such as those enumerated in the Policy or otherwise.

Panels have held that the use of a domain name for illegal activity, here unauthorized account access, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel finds that Respondent registered the Disputed Domain Name in bad faith. Soon after the Disputed Domain Name was registered it was associated with a website that included content copied from Complainant’s website. Respondent also listed Complainant’s telephone number and the address of

Complainant's counsel in its contact information. This copying is evidence, obviously, that Respondent had actual knowledge of Complainant and its rights in the Mark.

Moreover, within days of its registration, Respondent began using the Disputed Domain Name in bad faith, using an email address built on the Disputed Domain Name to fraudulently access a third party's Verizon account. Given that this bad faith use followed so quickly after the registration of the Disputed Domain Name, the Panel infers and finds that Respondent registered the Disputed Domain Name for the bad faith purpose of engaging in such fraud.

Respondent's copying of content from Complainant's website is blatant bad faith impersonation. Panels have consistently recognized that the use of a domain name to impersonate a complainant or to support fraudulent email activity is evidence of bad faith under the Policy. [WIPO Overview 3.1](#), section 3.4.

The evidence shows that Respondent selected the domain with knowledge of Complainant and used it to create the false appearance of affiliation in order to mislead third parties. This pattern of concealment, impersonation, and deceptive use is consistent with bad faith registration and use under the Policy. Panels have held that the use of a domain name for illegal activity, here unauthorized account access, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

Having reviewed the record, the Panel finds Respondent's registration and use of the Disputed Domain Name constitutes bad faith under the Policy.

The Panel finds that 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 <seachangefound.com> be transferred to Complainant.

/Lawrence K. Nodine/

Lawrence K. Nodine

Sole Panelist

Date: June 11, 2026