

ADMINISTRATIVE PANEL DECISION

Northwestern University v. Andreas Andreou
Case No. D2026-2504

1. The Parties

The Complainant is Northwestern University, United States of America ("United States"), represented by Faegre Drinker Biddle & Reath LLP, United States.

The Respondent is Andreas Andreou, Cyprus.

2. The Domain Name and Registrar

The disputed domain name <wardcenter.net> (the "Disputed Domain Name") is registered with Gandi SAS (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 9, 2026. On June 10, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On June 11, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 15, 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 amended Complaint on June 16, 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 the Respondent of the Complaint, and the proceedings commenced on June 19, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 9, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 22, 2026.

The Center appointed Nick J. Gardner as the sole panelist in this matter on July 24, 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 Northwestern University, a private research university located in Evanston, Illinois, United States. One of the Complainant's constituent schools is the Kellogg School of Management ("Kellogg"). The Complainant owns numerous United States trademark registrations, including NORTHWESTERN (United States Registration No. 1,288,285), registered on July 31, 1984, and KELLOGG (United States Registration No. 1,962,584), registered on March 19, 1996.

The John L. Ward Center for Family Enterprises (the "Ward Center") is a teaching and research center within Kellogg. It was founded in 1999 and is named after Professor John L. Ward. Until 2020, the center operated under the name "Kellogg Center for Family Enterprises" and used the domain name <kelloggcfecfe.com>. Following a naming gift from the Tanoto Foundation announced in 2020, the center adopted its present name.

Prior to the public announcement of the renaming, the Complainant directed a vendor, Lexlumina Group, to host content relating to the renamed center at a website linked to the Disputed Domain Name, which was created on February 26, 2020 (the "Complainant's Website"). It appears that the Complainant was not itself the registrant of record in respect of the Disputed Domain Name; rather, Lexlumina Group managed the registration (exactly how is unclear – see discussion below) and maintained the Complainant's Website at the Complainant's direction. For a period of several years, the Complainant's Website displayed genuine Ward Center content. The relationship between the Complainant and Lexlumina Group ended in or around 2024. When the Complainant subsequently enquired about the Disputed Domain Name, Lexlumina Group denied ownership of it. The record does not establish how control of the registration passed from that arrangement to the Respondent (see further the discussion below).

By May 19, 2026 (the date of the web capture in evidence), the website linked to the Disputed Domain Name resolved to a website (the "Respondent's Website") which displayed content substantially replicating that of the Complainant's Website – including institutional text concerning the Tanoto Foundation gift, historical information about the center, and Northwestern/Kellogg branding, imagery, and contact details – while also displaying, within the site's top navigation bar and in a lengthy list under the heading "Popular choices" appended to the foot of the page, numerous links to online casinos. The genuine content refers to the "Ward Center" and "The John L. Ward Center for Family Enterprises" numerous times.

A record in the case file dated June 19, 2026 indicates that the Disputed Domain Name was, by that date, no longer resolving.

The Disputed Domain Name was registered through a privacy service. Following registrar verification, the disclosed registrant is Andreas Andreou, of Larnaca, Cyprus, with a contact email address at the domain <domainagencyuk.com>.

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 holds registered trademark rights in NORTHWESTERN and KELLOGG, and unregistered common law rights in WARD CENTER and THE JOHN L. WARD CENTER FOR FAMILY ENTERPRISES, the latter two terms having acquired secondary meaning through continuous and prominent use since 2020, reinforced by the Respondent's own targeting of the mark. It contends the Disputed Domain Name is confusingly similar to the WARD CENTER mark because it wholly incorporates it, the ".net" generic Top-Level Domain ("gTLD") being disregarded for this purpose.

The Complainant contends that the Respondent has no rights or legitimate interests in the Disputed Domain Name. It contends the Respondent is not authorised by, affiliated with, or commonly known by any name corresponding to, the Complainant or its marks, and that the Respondent's use of the Disputed Domain Name to impersonate the Complainant's Ward Center while promoting online gambling websites cannot constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use, citing (inter alia) *Ontario Lottery and Gaming Corp. v. Artem Hryva*, WIPO Case No. [D2025-3227](#).

The Complainant contends that the Respondent registered and is using the Disputed Domain Name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy, relying on the impersonating content and copied institutional material on the Respondent's Website, the historical association of the Disputed Domain Name with the genuine Ward Center, evidence of actual confusion (including a webinar participant's enquiry and a witness declaration describing having clicked through to the site without hesitation), and evidence that the Disputed Domain Name ranks prominently in search results for queries relating to the Ward Center.

The Complainant requests transfer of the Disputed Domain Name.

B. Respondent

The Respondent did not reply to the Complainant's contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Complainant must prove each of the following: (i) that the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; (ii) that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and (iii) that the Disputed Domain Name has been registered and is being used in bad faith. The Respondent's default does not automatically result in a finding for the Complainant; the Complainant must still establish each of the three elements on the record before the Panel. The Panel may, however, draw such inferences from the Respondent's default as it considers appropriate (Rules, paragraph 14(b)), and has done so where indicated below. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.3.

A. Identical or Confusingly Similar

The Disputed Domain Name is clearly not identical or confusingly similar to the Complainant's registered NORTHWESTERN or KELLOGG marks, and the Panel's finding under this element accordingly turns on whether the Complainant holds unregistered rights in WARD CENTER sufficient for purposes of paragraph 4(a)(i) of the Policy.

To establish unregistered or common law trademark rights, a complainant must show that the claimed mark has become a distinctive identifier which consumers associate with the complainant's goods or services. See [WIPO Overview 3.1](#), section 1.3. The Panel has considered this question with some care, since "Ward Center" combines a personal surname with a generic descriptor and, viewed in isolation, might possess only limited inherent distinctiveness. On the record before it, however, the Panel is satisfied that the Complainant has met its burden. The name has been used continuously and prominently by the Complainant since the 2020 renaming, including in institutional brochures, faculty biographies, and third-party references. It is not a generic term adopted independently by the Respondent but a name coined specifically to identify the

Complainant's center, in honour of a named individual associated exclusively with it. Most significantly, the Disputed Domain Name was itself used for several years, at the Complainant's direction, to display genuine Ward Center content — itself an indication that the term functioned as a source identifier associated specifically with the Complainant well before the Respondent came to control the registration. The Panel also takes into account, per [WIPO Overview 3.1](#), section 1.3, that a respondent's evident targeting of a claimed mark may support a finding that the mark has achieved significance as a source identifier; here, the Respondent's Website used the terms "Ward Center" and "The John L. Ward Center for Family Enterprises" repeatedly and reproduced the Complainant's own institutional content in substantial part, a pattern difficult to explain other than as a deliberate attempt to hold the site out as the genuine Ward Center. In the absence of any contrary evidence or argument from the Respondent – which noting the above evidence of the Complainant's reputation and use of the term would seem to present a rather difficult obstacle to overcome, the Panel finds the Complainant has established unregistered trademark rights in WARD CENTER.

The Disputed Domain Name wholly incorporates the WARD CENTER mark. The addition of the ".net" gTLD is a standard registration requirement and is disregarded for purposes of the confusing similarity test. See [WIPO Overview 3.1](#), section 1.11.1.

Accordingly the Panel finds that the Disputed Domain Name is confusingly similar to the Complainant's trademark and hence the first condition of paragraph 4(a) of the Policy has been fulfilled.

B. Rights or Legitimate Interests

Under paragraph 4(c) of the Policy, a respondent may establish rights or legitimate interests by showing, among other circumstances: (i) use of, or demonstrable preparations to use, the domain name in connection with a bona fide offering of goods or services; (ii) that it has been commonly known by the domain name; or (iii) legitimate noncommercial or fair use, without intent for commercial gain to misleadingly divert consumers or tarnish the mark at issue.

Where a complainant makes out a prima facie case that a respondent lacks rights or legitimate interests, the burden of production shifts to the respondent. See [WIPO Overview 3.1](#), section 2.1. The Complainant has done so here. There is no evidence the Respondent is affiliated with or authorised by the Complainant, or is commonly known by any name corresponding to the Disputed Domain Name. To the contrary, the evidence shows the Respondent used the Disputed Domain Name to reproduce the Complainant's own institutional content while interspersing it with promotional links to online gambling services, evidently for commercial gain.

Such use cannot amount to a bona fide offering of goods or services, nor to a legitimate noncommercial or fair use. UDRP panels have consistently held that use of a domain name to impersonate a complainant, or to pass off a website as being that of, or affiliated with, a complainant, can never confer rights or legitimate interests on a respondent. See [WIPO Overview 3.1](#), sections 2.5 and 2.5.3; *Ontario Lottery and Gaming Corp. v. Artem Hryva*, WIPO Case No. [D2025-3227](#). The circumstance that the Respondent may have acquired the registration after an earlier registrant allowed it to lapse, or otherwise lost control of it, does not itself confer rights or legitimate interests, in particular where the use that follows clearly mimics and therefore prejudices the Complainant's rights. See *Damien Colcanap, Il est Content v. Masud Rana*, WIPO Case No. [D2025-3473](#).

The Panel finds that the Respondent has failed to produce any evidence to establish his rights or legitimate interests in the Disputed Domain Name. Accordingly the Panel finds the Respondent has no rights or any legitimate interests in the Disputed Domain Name and the second condition of paragraph 4(a) of the Policy has been fulfilled.

C. Registered and Used in Bad Faith

Under paragraph 4(b) of the Policy a non-exhaustive list of factors evidencing registration and use in bad faith comprises:

(i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or

(ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location.

The evidence establishes that the Respondent's targeting of the Complainant was deliberate rather than coincidental. The Respondent's Website did not merely use the term "Ward Center" in a descriptive sense; it held itself out as the Ward Center, reproduced the Complainant's own institutional narrative (including the account of the Tanoto Foundation gift and the center's history), displayed the Complainant's NORTHWESTERN and KELLOGG branding and contact details, and interspersed that copied content with numerous casino links. The Disputed Domain Name itself had, for several years, been associated with genuine Ward Center content at the Complainant's direction, further undermining any suggestion of an innocent or independent adoption. The record also includes evidence of actual confusion – a webinar participant's enquiry as to whether the Ward Center remained active, and a declarant's account of having clicked through to the Respondent's site without hesitation after encountering it in search results – as well as evidence that the Disputed Domain Name ranks prominently in search results for queries associated with the Ward Center.

The Panel has considered, but does not find it necessary to resolve, precisely when and how the Respondent came to control the registration of the Disputed Domain Name. The WHOIS creation date has remained February 26, 2020 throughout, which does not, on its face, indicate an intervening drop-and-re-registration event of the kind addressed in some of the authorities the Complainant cites; the record instead suggests some other change of control following the end of the Complainant's relationship with Lexlumina Group, the mechanics of which are not established. This change in control is made more difficult to ascertain given the prevalence of privacy norms vis-à-vis domain name registrations nowadays; the evidence however supports such a conclusion.

The Complainant in affidavit evidence says that it is unclear to the Complainant whether (1) Lexlumina Group ever held the Disputed Domain Name, (2) held the Disputed Domain Name and allowed it to lapse, or (3) transferred or lost control of it to a third party. The Panel thinks it unlikely that the Respondent, an individual based in Cyprus, can have been the registrant at the time the Disputed Domain Name was resolving to the Complainant's Website. However, the position is unclear not least because the Complaint provides no useful information about who the Lexlumina Group was or exactly what the basis of its retainer was.

Taking all of this uncertainty into account the Panel concludes it is more likely than not that (1) the Disputed Domain Name was originally registered by either the Lexlumina Group or some other person pursuant to the relationship between the Complainant and the Lexlumina Group; and (2) the Respondent acquired the Disputed Domain Name at some date between (a) the date in 2024 when the relationship with Lexlumina Group came to an end and (b) May 19, 2026.

Whatever the precise sequence of events, the content of the Respondent's Website as at May 19, 2026 – which reproduces substantial portions of the Complainant's Website – leaves no room for doubt that the Respondent had actual knowledge of, and specifically targeted, the Complainant and its Ward Center.

In the present circumstances the Panel considers the Respondent's exact motivation is not immediately obvious. The Respondent's Website mixes text relating to the genuine Ward Center (derived from the Complainant's Website) with a listing of links to various on line casinos. The Panel thinks that the Respondent's motives are unlikely to involve attempting to attract persons seeking information about the Complainant's Ward Center to engage in visiting the casinos listed. The Panel considers it more likely that the Respondent's motives have to do with search engine optimization advantages gained by using an existing previously used domain name with content from the earlier genuine website combined with links to various casinos.

In any event the Panel notes that in any event the list paragraph 4(b) of the Policy is non exhaustive and takes the view that the registration of the Disputed Domain Name with knowledge of the Complainant's mark (which the Respondent must have had) is itself evidence of bad faith – see *The Channel Tunnel Group Ltd. v. John Powell*, WIPO Case No. [D2000-0038](#). This is particularly so given that the Respondent has not provided any explanation for its conduct in reproducing substantial content taken from the Complainant's Website.

Finally, the Panel notes that it is not possible to conceive of any plausible actual or contemplated use of the Disputed Domain Name by the Respondent that would not be illegitimate. The Respondent, having filed no Response, has not availed itself of the opportunity to advance any explanation of good faith, and the Panel infers that none exists.

The Panel accordingly finds that the Disputed Domain Name was registered and is being used in bad faith, and that the third element of paragraph 4(a) of the Policy has been established.

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 <wardcenter.net> be transferred to the Complainant.

/Nick J. Gardner/

Nick J. Gardner

Sole Panelist

Date: August 7, 2026