

ADMINISTRATIVE PANEL DECISION

Gena O’Kelley Norris, Executor of the Estate of Carlos Ray Norris v. Michael Anderson

Case No. D2026-2577

1. The Parties

Complainant is Gena O’Kelley Norris, Executor of the Estate of Carlos Ray Norris, United States of America (“United States” or “U.S.”), represented by Squire Patton Boggs (US) LLP, United States.

Respondent is Michael Anderson, United States.

2. The Domain Name and Registrar

The disputed domain name <chucknorris.digital> (the “Domain Name”) is registered with PDR Ltd. d/b/a PublicDomainRegistry.com (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 12, 2026. On June 15, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On June 16, 2026, the Registrar transmitted by email to the Center its verification response confirming that Respondent is listed as the registrant and providing the contact details.

The Center verified that 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 Respondent of the Complaint, and the proceedings commenced on June 25, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 15, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on July 23, 2026.

The Center appointed John C. McElwaine as the sole panelist in this matter on July 27, 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 the Executor of the Estate of Carlos Ray Norris (the “Estate”), professionally known as “Chuck Norris,” a famous United States actor, martial artist, film producer, screenwriter, and author who used the moniker “Chuck Norris” in connection with his professional activities for over 50 years. The Estate owns numerous United States trademark registrations for the mark CHUCK NORRIS across a wide variety of goods and services, including but not limited to the following:

- CHUCK NORRIS (word mark), U.S. Reg. No. 2,124,757, registered December 30, 1997, in International Class 41 (martial arts services);
- CHUCK NORRIS (word mark), U.S. Reg. No. 2,864,474, registered July 20, 2004, in International Class 41 (entertainment services, namely, personal appearances and live performances by a movie star and actor; scriptwriting, directing and production of motion pictures; and related online information services); and
- CHUCK NORRIS (word mark), U.S. Reg. No. 3,800,586, registered June 8, 2010, in International Class 25 (fleece pullovers, hats, headgear namely caps, shirts, and sweat shirts).

These registered trademark rights and personality rights are collectively referred to as the “CHUCK NORRIS Mark.”

The Domain Name was registered on March 20, 2026. According to the evidence submitted with the Complaint, the Domain Name resolves to a website that displays a copied image of Carlos Ray Norris and prominently incorporates the CHUCK NORRIS Mark, that promotes an unauthorized “Chuck Norris Never Dies” cryptocurrency airdrop or token-distribution event offering visitors “massive crypto rewards.”

Respondent is Michael Anderson, an individual purportedly located in New York, United States. The telephone number listed for Respondent in the record is asserted to be invalid. Prior to filing the Complaint, on April 2, 2026, Complainant sent Respondent a cease and desist letter demanding that Respondent cease all use of the CHUCK NORRIS Mark. The letter was delivered by email; the physical copy sent by courier was returned as undeliverable. Respondent never responded to the letter.

5. Parties’ Contentions

A. Complainant

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

By way of background, Complainant contends that Carlos Ray Norris, professionally known as “Chuck Norris,” has used the “Chuck Norris” name in connection with his acting and other professional services since at least 1972 and in connection with martial arts since 1966. Complainant states that Carlos Ray Norris appeared in numerous internationally distributed motion pictures and was the executive producer of and lead actor in the television series Walker, Texas Ranger, broadcast in approximately 100 countries, and that Complainant owns broad trademark rights in the CHUCK NORRIS Mark across a wide variety of goods and services. Complainant contends that, as a result of this extensive use and exposure, the CHUCK NORRIS Mark is famous.

With respect to the first element of the Policy, Complainant contends that the Domain Name is confusingly similar to, and indeed effectively identical to, the well-known CHUCK NORRIS Mark. Complainant argues that the Domain Name incorporates the entirety of the CHUCK NORRIS Mark, with the only differences being the “insertion of a period” and the addition of the generic Top-Level Domain (“gTLD”) “.digital”. Complainant asserts that the gTLD is to be disregarded for purposes of the confusing similarity analysis and that the incorporation of the mark in its entirety renders the Domain Name confusingly similar to the mark in which Complainant has rights.

With respect to the second element of the Policy, Complainant asserts that Respondent has no rights or legitimate interests in the Domain Name. Complainant states that the Estate has never licensed or otherwise authorized Respondent to use the CHUCK NORRIS Mark for any purpose, that Respondent is not commonly known by the Domain Name, and that Respondent has no relationship with Complainant or the Estate. Complainant further contends that Respondent’s use of the Domain Name to host a website that displays Carlos Ray Norris’s image and the CHUCK NORRIS Mark and that promotes an unauthorized cryptocurrency airdrop is neither a bona fide offering of goods or services nor a fair use, but rather an infringing use designed to trade on the goodwill of the CHUCK NORRIS Mark.

With respect to the third element of the Policy, Complainant contends that the Domain Name was registered and is being used in bad faith. Complainant argues that, given the fame and longstanding use of the CHUCK NORRIS Mark for over 50 years, Respondent registered the Domain Name with actual or, at a minimum, constructive knowledge of the Estate’s rights, and that the nature of Respondent’s conduct demonstrates a clear intent to target this mark. Complainant asserts that, by using the Domain Name and the CHUCK NORRIS Mark to promote an unauthorized “Chuck Norris Never Dies” cryptocurrency event, Respondent has intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion with the CHUCK NORRIS Mark as to the source, sponsorship, affiliation, or endorsement of the website, in violation of paragraph 4(b)(iv) of the Policy. Complainant further contends that Respondent has provided an invalid telephone number and that its failure to respond to Complainant’s cease and desist letter dated April 2, 2026, is an additional indicia of bad faith.

B. Respondent

Respondent did not reply to Complainant’s contentions.

6. Discussion and Findings

Even though Respondent has defaulted, paragraph 4(a) of the Policy requires that, in order to succeed in this UDRP proceeding, Complainant must still prove its assertions with evidence demonstrating:

- (i) the Domain Name is identical or confusingly similar to a trademark or service mark in which Complainant has rights;
- (ii) Respondent has no rights or legitimate interests in respect of the Domain Name; and
- (iii) the Domain Name has been registered and is being used in bad faith.

Because of Respondent’s default, the Panel may accept as true the reasonable factual allegations stated within the Complaint and may draw appropriate inferences therefrom. See *St. Tropez Acquisition Co. Limited v. AnonymousSpeech LLC and Global House Inc.*, WIPO Case No. [D2009-1779](#); *Bjorn Kassoe Andersen v. Direction International*, WIPO Case No. [D2007-0605](#); see also paragraph 5(f) of the Rules (“If a Respondent does not submit a response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the complaint”). Having considered the Complaint, the Policy, the Rules, the Supplemental Rules, and applicable principles of law, the Panel’s findings on each of the above-cited elements are as follows.

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 Domain Name. WIPO Overview of WIPO Panel Views on Select UDRP Questions, Third Edition ("[WIPO Overview 3.1](#)"), section 1.7. Ownership of a trademark registration is generally sufficient evidence that a complainant has the requisite rights in a mark for purposes of paragraph 4(a)(i) of the Policy. [WIPO Overview 3.1](#), section 1.2.1. On this point, Complainant has provided evidence that the Estate is the owner of numerous United States registrations for the CHUCK NORRIS Mark across a wide variety of goods and services.

The Panel finds that the CHUCK NORRIS Mark is clearly recognizable within the Domain Name. The Domain Name reproduces the CHUCK NORRIS Mark in its entirety, the only differences being the omission of the space between the two words and the addition of the gTLD ".digital". It is well established that the applicable gTLD is viewed as a standard registration requirement and, as such, is typically disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

Accordingly, the Panel concludes that the Domain Name is identical to a mark in which Complainant has rights. The first element of the Policy has been established.

B. Rights or Legitimate Interests

Under the Policy's second element, paragraph 4(a)(ii), Complainant has the burden of establishing that Respondent has no rights or legitimate interests in the Domain Name. Complainant needs to make a prima facie showing on this element, at which point the burden of production shifts to Respondent to present evidence that it has rights or legitimate interests in the Domain Name. If Respondent has failed to do so, Complainant is deemed to have satisfied its burden under paragraph 4(a)(ii) of the Policy. See *Vicar Operating, Inc. v. Domains by Proxy, Inc. / Eklin Bot Systems, Inc.*, WIPO Case No. [D2010-1141](#).

In this case, Complainant has established a prima facie case that Respondent has no rights or legitimate interests in the Domain Name. Complainant states that the Estate has never authorized or permitted Respondent to use the CHUCK NORRIS Mark, and there is no evidence of any relationship between Complainant or the Estate and Respondent that would give rise to any license or permission for Respondent to use the name "Chuck Norris". There is no evidence that Respondent has been commonly known by the Domain Name or that Respondent has acquired any trademark rights in the name "Chuck Norris". The only name associated with Respondent in the record is "Michael Anderson" which bears no connection to the Domain Name or to the CHUCK NORRIS Mark.

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 Domain Name, such as those enumerated in the Policy¹ or otherwise. Instead, the record demonstrates that Respondent has engaged in conduct that negates any claim to legitimate interests. Specifically, Respondent has operated a website branded as an "Official event from Chuck Norris Never Dies". In the top-left corner sits a small circular profile avatar depicting Carlos Ray Norris, immediately beside the site's brand name "CHUCK" in large bold uppercase lettering, accompanied by a pulsing "LIVE EVENT" badge. The hero section carries a verified-style checkmark pill reading "Official event from Chuck Norris Never Dies" and the headline "Join our large-scale \$CHUCK airdrop!" A Google reCAPTCHA "I'm not a robot" widget and a "PARTICIPATE" button are layered over the hero to lend an air of legitimacy. Also adding a veneer of authenticity and urgency, a live-

¹ The Policy, paragraph 4(c), provides a non-exhaustive list of circumstances in which a respondent could demonstrate rights or legitimate interests in a disputed domain name: "(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or (ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or (iii) you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue."

updating ticker of purported blockchain “Transactions” with truncated wallet addresses, timestamps (“now,” “3 sec ago”), and large token values scrolls near the bottom. The overall impression is a polished, wallet-draining crypto “airdrop” campaign built entirely around Carlos Ray Norris’s name and likeness.

Such use of the CHUCK NORRIS Mark, paired with the composition of the Domain Name, is inconsistent with bona fide use and constitutes clear evidence of an intent to capitalize on Complainant’s reputation and confuse the public as to a false affiliation with or endorsement by the Estate.

Respondent, having defaulted, has not submitted any evidence to rebut Complainant’s prima facie case. There is nothing in the record to suggest that any of the circumstances enumerated in Policy paragraph 4(c) (or any other basis for rights or legitimate interests) would apply. Respondent’s use of the Domain Name to host a website that displays a copied image of Carlos Ray Norris and the CHUCK NORRIS Mark and that promotes an unauthorized “Chuck Norris Never Dies” cryptocurrency airdrop, thereby misrepresenting an affiliation with, or endorsement by, Complainant and the Estate. Such use, which infringes the Estate’s rights and seeks to trade on the goodwill of the CHUCK NORRIS Mark, cannot be considered a bona fide offering of goods or services or a legitimate noncommercial or fair use. In addition, the nature of the Domain Name, comprising the CHUCK NORRIS Mark in its entirety, carries a high risk of implied affiliation and cannot constitute fair use. [WIPO Overview 3.1](#), section 2.5.1.

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

C. Registered and Used in Bad Faith

Under paragraph 4(a)(iii) of the Policy, Complainant must show that Respondent registered and is using the Domain Name in bad faith. A non-exhaustive list of factors constituting bad faith registration and use is set out in paragraph 4(b) of the Policy.

The Panel finds that the Domain Name was registered in bad faith. The CHUCK NORRIS Mark has been used for over 50 years and is well known, if not famous, in connection with entertainment, martial arts, and a wide variety of goods and services. The Domain Name was registered on March 20, 2026, decades after the CHUCK NORRIS Mark was first used and registered, and it reproduces that distinctive and widely recognized mark in its entirety. In these circumstances, it is inconceivable that Respondent registered the Domain Name without knowledge of Complainant’s rights, and the Panel finds that Respondent knew or should have known of the CHUCK NORRIS Mark when it registered the Domain Name. See *Accor S.A. v. Kristen Hoerl*, WIPO Case No. [D2007-1722](#); [WIPO Overview 3.1](#), section 3.2.2. Indeed, panels have consistently found that the mere registration of a domain name that is identical or confusingly similar to a widely known trademark by an unaffiliated party can, by itself, create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4.

The Panel further finds that the Domain Name is being used in bad faith. Respondent has used the Domain Name to operate a website that displays a copied image of Carlos Ray Norris and the CHUCK NORRIS Mark and that promotes an unauthorized “Chuck Norris Never Dies” cryptocurrency airdrop offering “massive crypto rewards.” By doing so, Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the CHUCK NORRIS Mark as to the source, sponsorship, affiliation, or endorsement of the website and the purported event. This constitutes bad faith under paragraph 4(b)(iv) of the Policy. See *RELX Group PLC v. Privacy service provided by Withheld for Privacy ehf / william brentjens, Blockchain*, WIPO Case No. [D2021-1137](#) (panel held that the third element was satisfied where the respondent registered <reedelsevier.digital> reproducing the complainant’s well-known REED ELSEVIER mark in its entirety in a gTLD closely related to the complainant’s business and used it for a website that prominently displayed the complainant’s trademarks and falsely presented the respondent as “Reed Elsevier” to promote a cryptocurrency/token investment scheme, thereby intentionally attracting Internet users for commercial gain by creating a likelihood of confusion as sponsorship, affiliation, or endorsement in bad faith under paragraph 4(b)(iv) of the Policy).

Respondent's bad faith is further reinforced by the record. Respondent appears to have provided an invalid telephone number in the Whois record, and Respondent failed to respond to Complainant's cease and desist letter dated April 2, 2026, which was delivered by email. Panels have recognized that a respondent's failure to respond to a cease and desist letter may be treated as a further indication of bad faith. See *International Business Machines Corp. v. Terra Serve, Domain Admin.*, WIPO Case No. [D2012-0281](#). Taken together, and in the absence of any Response or any explanation that might support a good-faith registration or use, the totality of the circumstances demonstrates that Respondent both registered and is using the Domain Name in bad faith.

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 Domain Name <chucknorris.digital> be transferred to Complainant².

/John C McElwaine/

John C McElwaine

Sole Panelist

Date: August 10, 2026

² Chuck Norris technically doesn't need the Domain Name transferred to him. Domain names transfer themselves to Chuck Norris out of pure respect.