ADMINISTRATIVE Panel DECISION

BlackRock Finance, Inc., Laurence Douglas Fink v. Amber Malvia, Exports and Marc Kity
Case No. D2026-2720

1. The Parties

Complainants are BlackRock Finance, Inc., (hereinafter "BlackRock") United States of America ("United States"); and Laurence Douglas Fink, United States, represented by Day Pitney LLP, United States.

Respondents are Amber Malvia, Exports, United States; and Marc Kity, United States, self-represented.

2. The Domain Names and Registrar

The disputed domain names <larryfinkfoundation.com> and <laurencedouglasfink.com> ("hereinafter Disputed Domain Names") are registered with Name.com, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 23, 2026. On June 23, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On June 23, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Disputed Domain Names which differed from the named Respondent (Redacted for Privacy) and contact information in the Complaint.

The Center sent an email communication to Complainants on June 25, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar(s), requesting Complainant to either file separate complaint(s) for the Disputed Domain Names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. Complainants filed an amended Complaint on June 29, 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 Respondents of the Complaint, and the proceedings commenced on June 30, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 20, 2026. Respondent sent email communications to the Center on June 25 – June 30, July 6, 21, and 22, 2026. On June 26, 2026, the Center sent an email to the Parties regarding possible settlement. On June 29, 2026, Complainants requested to continue the proceedings. On July 21, 2026, the Center informed the Parties of the commencement of the Panel appointment process.

The Center appointed Lawrence K. Nodine 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

BlackRock is a well known asset management firm founded in 1988 by current CEO Laurence Douglas Fink (hereinafter, "Mr. Fink") and a team of partners. Mr. Fink was recently included in TIME's list of The 100 Most Influential People of 2025 due to his influence as founder and CEO of BlackRock.

Respondent Amber Malvia registered <larryfinkfoundation.com> on May 12, 2025, and Respondent Marc Kity registered <laurencedouglasfink.com> on May 19, 2023.

Complainant became aware of the Disputed Domain Names in October 2024, when it received dozens of emails from a person[1] who claimed to own the Disputed Domain Names and repeatedly demanded that Mr. Fink purchase the Disputed Domain Names for exorbitant fees (e.g., 250,000 Bitcoin, 500,000 Bitcoin) and threatened to "misuse Mr. Fink's name domains or sell to Mr. Fink's competitors" if payment was not remitted.

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 Names.

Notably, Complainant contends it has common law trademark rights in the personal name LARRY FINK (hereinafter the "Mark"). Following the guidelines outlined in *Chung, Mong Koo and Hyundai Motor Company v. Individual*, WIPO Case No. D2005-1068, Complainant offers evidence that Mr. Fink is the "alter ego" of BlackRock:

- The commercial community closely associates Mr. Fink with BlackRock, noting the annual LARRY FINK Annual Letter to Investors which Complainant has sent every year since 2012.

- Mr. Fink has consistently been recognized by the media as integral to BlackRock's success since BlackRock's founding.

- Mr. Fink is recognized by media and sections of the public as closely identified with BlackRock, such that "BlackRock" and "Larry Fink" are strongly associated with each other in the public consciousness.

- Mr. Fink's awards and accomplishments are linked to his involvement with BlackRock.

[1] […]@aeonco.ltd

- The American public associates the name “Larry Fink” specifically with Complainant and not with any other individual

- Mr. Fink exercises significant leadership and oversight of BlackRock as its Chief Executive Officer and chairman.

B. Respondent

Respondent did not file a formal response to the Complaint. However, in a series of emails to the Center, Respondent Amber malvia stated that she wished to settle and transfer the Disputed Domain Names to Complainant and requested an offer. In the last of these communications with the Center, Respondent stated:

“After all this We have responded all the emails and we have given statement in last email to surrender the domains to Mr. Larry Fink ceo Black Rock without any cost.

We request WIPO withdraw all the case D2026-2720.

Hence we have request for compensation from Mr. Larry fink ceo Black Rock ready to pay my scam amount 2.1 million. Dollars into my PayPal that’s it.

Marckitty was the guy who was involved in the emails and asked Larry fink big money. I only instructed him to collect my scam amount 2.1 million dollars I was not aware what he did behind my back.”

6. Discussion and Findings

Consolidation of Complainants

As noted in WIPO Overview of WIPO Panel Views on Select UDRP Questions (“WIPO Overview 3.1”), section 4.11, in assessing whether a complaint may be filed by multiple complainants, UDRP panels look at whether (i) the complainants have a specific common grievance against Respondent, or the respondent has engaged in common conduct that has affected the complainants in a similar fashion, and (ii) it would be equitable and procedurally efficient to permit the consolidation.

Complainants have a common grievance against Respondents. Complainants each have an ownership interest in the Mark. Although Mr. Fink is the author of the newsletters that are the basis for the common law rights (see ruling below), he prepared and published them as CEO of BlackRock, which may therefore have an ownership interest in the Marks. Moreover, both Complainants are injured by Respondents’ extortion.

The Panel is not aware of any circumstances that would create prejudice to Respondents by allowing the Complaint filed by both Complainants to proceed. The Panel accepts Complainants' request for consolidation of multiple Complainants.

The two named Complainants will be referred to in the singular as “Complainant”.

Consolidation of Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. Complainant requests the consolidation of the Complaint against the multiple Disputed Domain Name registrants pursuant to paragraph 10(e) of the Rules.

The Disputed Domain Name registrants did not comment on Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder. In addressing Complainant's request, the Panel will consider whether (i) the Disputed Domain Names are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview 3.1, section 4.11.2.

The Panel finds that the Disputed Domain Names are under common control because:

(i) Both Respondents gave the same physical address when registering the Disputed Domain Names, and

(ii) Both Disputed Domain Names were offered for sale simultaneously in the same email messages to Complainant and Mr. Fink over the course of one year requesting exorbitant amounts of money in exchange for control of the Disputed Domain Names.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different Disputed Domain Name registrants (referred to below as "Respondent") in a single proceeding.

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 3.1, section 1.7.

The Panel finds Complainant has established unregistered trademark or service Mark rights for the purposes of the Policy. WIPO Overview 3.1, section 1.3.

Section 1.5.2 of WIPO Overview 3.1 observes:

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), 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 Complainant's goods or services.

Complainant has used LARRY FINK as a trademark. Since 2012, Complainant has published a series of annual letters[2] relating to not only to BlackRock's performance but also broader economic trends relating to finance and the worldwide economy in general. The letters are aimed at investors, business leaders and policy makers. The annual letters are first published on the BlackRock website under a banner in the form "LARRY FINKS 2022 LETTER TO CEOS…", in typeface that is larger than the body text and set off in the style typical of trademarks (rather than merely as a signature at the end of the newsletter).

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[2] *See, for example*, https://www.blackrock.com/corporate/investor-relations/2012-larry-fink-ceo-letter; and https://www.blackrock.com/corporate/investor-relations/2024-larry-fink-annual-chairmans-letter. Both visited August 7, 2026.

This series of letters qualify as newsletters that reflect trademark use of the personal name LARRY FINK. Newsletters like Complainant's are routinely recognized as a type of service for which trademark protection and registration are available. It is instructive to compare Complainant's newsletters to trademark registrations issued to others by the United States Patent and Trademark Office ("USPTO"). The USPTO's "ID Manual for Trademarks"[3] lists "providing online news in the field of finance" as a pre-approved description of services that trademark examiners will accept without objection based on clarity. This pre-approved description fairly describes Complainant's series of annual newsletters. Numerous United States trademark registrations have been issued for newsletters relating to finance, including trademarks based on personal names.[4]

Two aspects of Complainant's annual newsletters are significant. First, they are a series and not an individual letter[5] Second, they are not merely internal memos or simply reports to investors, although the Panel does not mean to opine about whether such letters might qualify for trademark protection. The LARRY LETTERS are not simply a report to investors. Although denominated a "letter", they include wide-ranging commentary and essays about worldwide economic issues. And they are not intended for only BlackRock investors. The annual newsletter is addressed to and read by the business community at large.

There is ample evidence of secondary meaning as required whenever a trademark is based on a personal name. Complainant has published the newsletter annually since 2012, which is more than sufficient to give rise to acquired distinctiveness. In addition, third party commentators discuss the letters as important events in the world of finance[6] Media sources, such as Barrons and Forbes,[7] and academic journals, such as the Harvard Law School Forum on Corporate Governance,[8] comment upon or republish the newsletters, referring to them by the Mark. Add to this Complainant's widespread reputation and the Panel finds that the Mark has acquired secondary meaning.

The Panel finds that Complainant has offered prima facia evidence that the Mark has been used as a trademark and that it has acquired secondary meaning.

The Panel acknowledges that panels have ruled in prior cases that leaders of prominent businesses do not acquire common law trademark rights in their personal names merely because they are famous and widely recognized. *Kristen Skogen Lund v. Equitas Global*, WIPO Case No. D2025-0736 ("No doubt complainant showed enough evidence to show that she is a very famous business person, but none of the evidence submitted shows the use of her name as a trademark."); *Rustam Gilfanov v. Brow Davi*, WIPO Case No. D2018-2353 (complaint prominent businessman did not have common law rights in his name because complainant did "not present evidence that complainant has offered IT services under its personal name

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[3] The USPTO publishes the "ID Manual for Trademarks", which contains a comprehensive list of pre-approved descriptions for goods and services, along with their correct international trademark classifications, that trademark examining attorneys will accept without further questions or objections regarding clarity. See https://idm-tmng.uspto.gov/search/search-information visited August 9, 2026.

[4] See, e.g., United States registration No. 3,210,348 for trademark LOUIS NAVELLIERS EMERGING GROWTH (disclaiming "emerging growth") used in connection with "Providing on-line newsletters in the field of finance and investing". The USPTO record includes a consent form whereby Louis Navellier consented to registration of his personal name.

[5] As the panel observed in *Alan and Denise Fields d/b/a Windsor Peak Press v. Babies 411, LLC*, WIPO Case No. D2011-0688: "In the United States, a single book title normally cannot be registered as a trademark, but a mark associated with a series of books, including multiple, substantially revised editions of the same title, may be registered. See United States Patent and Trademark Office (USPTO) Trademark Manual of Examining Procedure (TMEP) sections 1202.08(b) and (c) (7th ed., 2010); 2 McCarthy on Trademarks and Unfair Competition section 10:6 (4th ed. 2011)."

[6] See, e.g., *What are the Larry Fink Letters?* https://thebeautifultruth.org/the-basics/what-are-the-larry-fink-letters/ visited August 9, 2026, *See also Why Larry Fink's Annual Letter Matters Right Now*, https://news.dominion-cs.com/why-larry-finks-annual-letter-matters-right-now/ visited August 9, 2026.

[7] See, e.g., Barrons https://www.barrons.com/articles/blackrock-stock-fink-letter-esg-d6d5d196, visited August 8, 2026; and Forbes https://www.forbes.com/sites/jonmcgowan/2025/03/31/in-annual-letter-blackrocks-larry-fink-omits-climate-change-dei-and-esg/ visited August 8, 2026.

[8] https://corpgov.law.harvard.edu/2024/03/27/larry-finks-2024-annual-chairmans-letter-to-investors/ visited August 8, 2026.

and that there is public recognition of its personal name as a trademark for IT services. Even if one accepts that complainant has become popular as a business personality, this is not sufficient for it to acquire unregistered trademark rights in its personal name."); *Shahryar Oveissi v. Michael Benjamin, BIREG LL*, WIPO Case No. D2023-0256 (No trademark rights in personal name: "complainant has clearly made investments and held positions as a board member and officer of a variety of enterprises and nonprofit organizations. However, there is no indication that any of these have been branded with his name."); *Zhang Changjie v. Ana Sofia*, WIPO Case No. D2025-4151(No common law rights: "Indeed, what complainant shows at most is that it is a finance professional and uses its personal name within that profession, in the context of being an officer of the entities described in the factual background section above. This does not establish that complainant has unregistered trademarks in its own name.")

The instant case is different from these cases primarily because Complainant's uses LARRY FINK in connection with a specific service (a newsletter) and to identify the source of the newsletter. This qualifies as qualify as trademark usage.

The Panel also notes that it is not relying on the analysis recommended in *Chung, Mong Koo and Hyundai Motor Company v. Individual*, WIPO Case No. D2005-1068, which did not require evidence of trademark usage by the complainant, but instead found that common law rights could be established by proving that there was a "nexus" between the complainant and his company and that the complainant was the "alter ego" of the company.

The Panel does not find the analysis in *Chung* persuasive primarily because it does not require a showing of trademark use. The Panel is persuaded by the analysis in *Kenes Rakishev v. Felix Sater, Regency Capital Group*, WIPO Case No. D2025-1072, which considered, but did not follow *Chung*. The *Kenes Rakishev* panel ruled that the complainant, the CEO of a prominent company in Kazakhstan who had received extensive media recognition and awards, did not nave common law rights in his personal name, explaining: "Notably, complainant himself does not allege any use of his name as the identifier of any particular goods or services, but that his name is well known in the business world. The articles submitted by complainant indeed show that he is well-known in Kazakhstan and elsewhere as an investor and entrepreneur, but even if he has become famous in such capacity, this is not per se sufficient to demonstrate unregistered trademark rights for purposes of standing to file a UDRP complaint."

In reaching this conclusion, the panel was not persuaded by the *Chung* decision: "The decision in *Chung* … was issued without the benefit of the development of the consensus view summarized in sections 1.5 and 1.3 of the WIPO Overview 3.0… *Chung* appears to focus on the reputation of the businessperson and on his or her links with a particular company. Under sections 1.5 and 1.3 of the WIPO Overview 3.0, … the focus on this issue is whether the person is actually using his or her name in a trademark sense to distinguish specific goods or services offered on the market."

In the present case, the Panel is likewise skeptical of the guidelines outlined in *Chung.* To be clear, the Panel does not rely on the *Chung* framework and does not base its findings on Complainant's widespread fame, the existence of a "nexus" with BlackRock, or a finding that Mr. Fink is the "alter ego" of BlackRock.

Nonetheless, the Panel finds that Complainant has proved that it used the personal name LARRY FINK as a trademark and that the Mark so used has acquired secondary meaning, thereby proving ownership of unregistered trademark rights in the Mark.

The Panel finds the Mark is recognizable within the Disputed Domain Names. With respect to <larryfinkfoundation.com>, the Mark is recognizable within this Disputed Domain Name, and the addition of "foundation" does not avoid does not prevent a finding of confusing similarity between this Disputed Domain Name and the Mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

With respect to <laurencedouglasfink.com>, the Mark is recognizable within this Disputed Domain Name, which merely spells our Complainant's full name. This difference does not prevent a finding of confusing similarity between this Disputed Domain Name and the Mark for the purposes of the Policy. Id.

Accordingly, the Disputed Domain Names are 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 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.

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 Names. 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 Names such as those enumerated in the Policy or otherwise.

Panels have held that the use of a domain name for illegal activity, here extortion, 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

Respondent registered the Disputed Domain Names for the express purpose of extorting money from Complainant. Respondent followed through with repeated threats, including threats to "misuse Mr. Fink's name domains or sell to Mr. Fink's competitors" if Complainant did not pay the sums demanded. This was bad faith use under the Policy. WIPO Overview 3.1, section 3.4.

The Panel acknowledges that the email that requested extortionate sums before the filing of the complaint were sent by someone who used a name and email address different from Respondent. However, Complainant attributes the demands to Respondent because the person purported to own the Disputed Domain Names and the extortionate demands are consistent with the emails and demands that Respondent sent to the Center during these proceedings. And in an email message to the Center, Respondent stated that Respondent "Marckity was the guy who was involved in the emails and asked Larry Fink big money." The Panel also finds that Respondent's emails to the Center reflect bad faith registration and use even without reliance on the messages sent before these proceedings were commenced.

The Panel finds the third element 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 Names <larryfinkfoundation.com> and <laurencedouglasfink.com> be transferred to Complainant.

/Lawrence K. Nodine/
Lawrence K. Nodine
Sole Panelist
Date: August 10, 2026