

ADMINISTRATIVE PANEL DECISION

Grace Tame v. Ezra Levant, Rebel News Network Ltd.
Case No. D2026-2790

1. The Parties

The Complainant is Grace Tame, Australia, represented by Marque Lawyers, Australia.

The Respondent is Ezra Levant, Rebel News Network Ltd., Canada.

2. The Domain Name and Registrar

The disputed domain name <gracetame.com> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 26, 2026. On June 26, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 29, 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 (Registration Private, Domains By Proxy, LLC / Avi Yemini, Rebel News Network Ltd) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 2, 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 a first amendment to the Complaint on July 6, 2026, and second amendment to the Complaint on July 8, 2026.

The Center verified that the Complaint together with the amendments 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 July 8, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 28, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 29, 2026.

The Center appointed Andrew D. S. Lothian as the sole panelist in this matter on August 7, 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

According to the Complaint, the Complainant is a private individual based in Australia, and is a prominent public figure known as an activist, public speaker, and author. In 2021, the Complainant was named as Australian of the Year for her advocacy work on behalf of survivors of sexual assault. According to the Complainant's annexes, the Complainant is the founder of The Grace Tame Foundation, a not-for-profit organization working on initiatives to prevent and respond to child sexual abuse. Evidence is provided showing that the Complainant is available to book as a public speaker for events and also that she has toured theatres in Australia with her own show about her life and experiences. The Complainant also provides evidence that she is a published author, her memoirs having been nominated for numerous book awards in Australia in 2022, and that she has contributed to numerous podcasts and live events, including paid-for events, discussing her experience and activism.

A 2026 screenshot of the Complainant's Instagram page indicates that she has over 303,000 followers. A screenshot of the Complainant's LinkedIn page states that, in 2021, the Complainant was listed as the most culturally powerful person in Australia by the Australian Financial Review.

The Complainant holds no registered trademarks but claims unregistered trademark rights in the mark GRACE TAME which she contends that she has used since 2018 in connection with services including activism and legal advocacy; public speaking, presenting and entertainment services (such as hosting podcasts, book tours, and appearing as a speaker on radio, television, and at live events); and authoring and writing services (authoring of books and articles). While the Complainant claims use of her personal name in commerce since 2018, the evidence annexed to the Complaint appears to date from 2021. However, nothing turns on this apparent discrepancy, largely because the Complainant's rights in any event accrued well before the disputed domain name was registered (as discussed further below).

The disputed domain name was registered on February 10, 2026. Little is known about the Respondent which has not participated in these proceedings, other than that the Respondent individual (named in the Registrar verification as Ezra Levant) appears to be a private individual based in Toronto, Canada, possibly acting as a representative for an apparent limited company named in the organization field of the registration data for the disputed domain name as Rebel News Network Ltd. (the "Respondent company"). For convenience, the Panel refers to the Respondent individual and the Respondent company together as "the Respondent" unless the context indicates otherwise.

According to a screenshot provided by the Complainant, the disputed domain name points to a dedicated page on a website at "www.rebelnews.com" which appears to be connected to the Respondent company. Said screenshot references the Complainant and the disputed domain name, makes certain allegations against the Complainant, calls for her to be stripped of her Australian of the Year title and solicits donations from the public to fund the defense of the Respondent and of an individual named A. Y. against what it describes as the Complainant's threats of legal action.

5. Parties' Contentions

A. Complainant

The Complainant contends that she has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Complainant asserts that she has unregistered trademark rights in the mark GRACE TAME which is the Complainant's personal name, and which she contends has been used by her in connection with services since 2018, including activism and legal advocacy; public speaking, presenting and entertainment services (such as hosting podcasts, book tours, and appearing as a speaker on radio, television, and at live events); and authoring and writing services (authoring of books and articles). The Complainant produces documentation evidencing her profile as a public speaker, podcast presenter and author of a successful published memoir. In particular, evidence is produced of a theatre tour and an appearance in March 2024 at Sydney Opera House during the "All About Women Festival". Tickets for both of said events appear to have been on sale to the public.

The Complainant asserts that through her extensive use and promotion of the trademark in relation to said services, the said mark has acquired substantial reputation and goodwill, which serves as an identifier of the Complainant and the Complainant's services. The Complainant contends that the disputed domain name is identical to the trademark in which the Complainant has unregistered rights.

The Complainant further contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. In particular, the Complainant asserts that the Respondent is not affiliated or connected with the Complainant and does not have permission to use the Complainant's trademark. Further, there is no evidence that the Respondent has used, or made demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services. The Respondent is not commonly known by the disputed domain name and has no trademark or other rights in the Complainant's trademark. The Respondent has adopted a domain name that is identical to the Complainant's trademark, despite having no legitimate connection to it.

The Complainant submits further that the Respondent is using the disputed domain name, which is identical to the Complainant's trademark, to deliberately mislead and redirect Internet users to a website containing disparaging content about the Complainant. The Complainant contends that the Respondent's said use of the disputed domain name does not constitute a legitimate noncommercial or fair use and that the Respondent has adopted the disputed domain name to misleadingly divert Internet users searching for the Complainant or the Complainant's services to the Respondent's website, adding that the Respondent intends to tarnish the Complainant's trademark by associating the Complainant's name with disparaging content.

The Complainant contends that the disputed domain name has been registered and is being used in bad faith. In particular, the Complainant asserts that her trademark rights predate the Respondent's registration of the disputed domain name, and given that the disputed domain name is identical to the Complainant's trademark, the Respondent chose the disputed domain name because of its connection to the Complainant in a deliberate attempt to tarnish the Complainant's trademark in bad faith.

The Complainant notes that the Respondent is using the disputed domain name to redirect Internet users to a website containing disparaging content about the Complainant and asserts that the Respondent also uses the website to request donations from the public for legal costs to defend claims from the Complainant and to encourage users to sign a petition concerning the withdrawal of the Complainant's Australian of the Year award granted by the Australian government. The Complainant submits that this shows that the Respondent is using the Complainant's trademark to attract Internet users and disrupt the business of the Complainant and to promote the Respondent's own interests and commercial gain while leveraging the Complainant's trademark. The Complainant contends that the likelihood of confusion among Internet users is high as the disputed domain name is identical to the Complainant's trademark and is likely to cause confusion as to the source of the disputed domain name. The Complainant submits that, accordingly, the Respondent has registered and is using the disputed domain name in bad faith.

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 asserts that she has UDRP-relevant rights in her personal name. She does not appear to hold any registered trademarks corresponding to such name. Registered trademarks comprised of personal names are sufficient to establish standing to file a UDRP case. [WIPO Overview 3.1](#), section 1.5.1. 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. [WIPO Overview 3.1](#), section 1.5.2.

Such use as a distinctive identifier in commerce could be shown by way of a range of factors including, for example, (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 claimed mark must 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. [WIPO Overview 3.1](#), section 1.3.

[WIPO Overview 3.1](#), section 1.5.2, also notes that merely having a famous name (such as a businessperson 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.

Here, the Panel is satisfied that the Complainant has shown that her personal name is used in commerce as a source identifier of goods and services, based upon the evidence which she has presented, namely her paid speaking engagements and entertainment events where tickets are on sale to the public (and her availability to be booked for the same through a speaker's bureau), and the Complainant's published autobiography which the evidence shows is available for sale on the publisher's website. Furthermore, the Complainant is marketing such speaking engagements and the said publication in her personal name and capacity rather than (as is the case with certain prominent businesspeople) in her capacity as officer or representative of a company. In short, the record supports the conclusion that the Complainant's personal name has acquired secondary meaning as an unregistered trademark because it is associated in the market with specific goods and services. This may be contrasted, for example, with the recent UDRP case *Sridhar Yerramreddy v. Jonathan Svilar*, WIPO Case No. [D2026-3097](#) in which a similar claim was found not to be made out because, as the panel noted, "[...] the Complainant's professional activities are distinguished but do not distinctively 'brand' particular products with his personal name [...] and there is no evidence in the record that the Complainant is marketing books or speaking engagements, for example, under his name".

The Panel finds the Complainant has established unregistered trademark or service mark rights for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.3.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The applicable Top Level Domain (“TLD”) in a domain name (e.g., “.com”, “.club”, “.nyc”) (here, “.com”) is viewed as a standard registration requirement and as such may be disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

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

B. Rights or Legitimate Interests and Registered and Used in Bad Faith

Apart from the circumstances surrounding the registration of a domain name, to support a claim to rights or legitimate interests under the UDRP, the use of a disputed domain name must in any event not be abusive of third-party trademark rights. In some cases therefore, panels assess the second and third UDRP elements together, for example where clear indicia of bad faith suggest there cannot be any respondent rights or legitimate interests. In such cases, panels have found that the facts and circumstances of the case would benefit from a joint discussion of the policy elements. [WIPO Overview 3.1](#), section 2.15.

Here, the evidence shows that the disputed domain name is being used to publish criticism of the Complainant on the associated website. Consequently, the Respondent might be able to establish that it is making a legitimate noncommercial or fair use of the disputed domain name on the basis of paragraph 4(c)(iii) of the Policy. If such a case were made out, it would follow that the disputed domain name would not have been registered and used in bad faith. However, there are circumstances that could defeat any claim to rights or legitimate interests under paragraph 4(c)(iii) of the Policy. First, the criticism might be found not to be genuine, or to be merely pretextual. Secondly, the website might be directed towards securing a material commercial benefit for the Respondent. Thirdly, the composition of the disputed domain name might effectively impersonate the Complainant. Should any of these circumstances be established, it would follow that the Respondent could not demonstrate rights or legitimate interests and that the disputed domain name had been registered and used in bad faith. As the second and third elements of the Policy are linked in the manner described in this particular case, the Panel considers it appropriate to consider them together.

As noted above, the disputed domain name is being used for criticism of the Complainant. It has the appearance of being genuine criticism in the sense that the views expressed are apparently held by the Respondent on a genuine basis and not merely a pretext for cybersquatting, noting that the Panel is not assessing whether such content is true, reasonable, or justified (see, for example, the discussion in *Gil Negrete v. Mustafa Derahovic*, WIPO Case No. [D2025-2775](#)). However, the website associated with the disputed domain name is being used to solicit donations to a legal fund, allegedly to defend against action brought by the Complainant. This could be regarded as the Respondent attempting to seek an economic benefit (either for itself or for the named third party, or both) and, if so, might weigh against a finding of legitimate noncommercial or fair use under paragraph 4(c)(iii) of the Policy. In any event, the Panel need not reach a concluded finding on the question of such possible commercial use in light of its determination discussed below regarding the fact that the disputed domain name effectively impersonates the Complainant.

The disputed domain name is identical to the Complainant’s GRACE TAME unregistered mark, and as is noted in *Sridhar Yerramreddy v. Jonathan Svilar*, supra, “the growing consensus, as reported in [WIPO Overview 3.1](#), section 2.6.2, is that even a general right to legitimate criticism does not necessarily extend to registering or using a domain name that is identical to a trademark, given the high risk of confusion and impersonation”. Broadly speaking, the reason for such growing consensus is that it cannot be regarded as fair within the meaning of the Policy for a respondent to incorporate a trademark into an identical domain name which could thereby deceive Internet users intending to visit an official website of the trademark owner. This Panel has noted in previous cases of a similar nature (for example, see *Brad Smotherman v. Vinay Parmar*, WIPO Case No. [D2025-5216](#)) that it favors an analogy that the use of such a domain name is not the equivalent of standing outside the trademark owner’s premises with a placard containing an expression of criticism and exercising one’s right of free speech; rather, it amounts to constructing an identical entrance to the trademark owner’s premises and lying in wait for an audience of visitors who do not necessarily wish to be there and who are simply looking for the correct way into the Complainant’s office.

In all of these circumstances, the Panel finds that the disputed domain name, being identical to the Complainant's unregistered trademark and being used to disseminate criticism of (and raise donations against) the Complainant, cannot confer rights and legitimate interests upon the Respondent in terms of paragraph 4(c)(iii) of the Policy. The disputed domain name creates "an impermissible risk of user confusion through impersonation" as described in [WIPO Overview 3.1](#), section 2.6.2. Furthermore, the Panel finds it established that the Respondent registered and used the disputed domain name intentionally to target the Complainant and her trademark by way of such impersonation. It is clear from the content of the website associated with the disputed domain name that the Respondent knew of the Complainant. The Respondent selected the Complainant's exact personal name and unregistered trademark in the disputed domain name, and used it in association with a website through which it intended to capture the attention of Internet users who, in light of the exact match nature of the disputed domain name, would expect to find an official site of the Complainant. In all of these circumstances, the Panel finds that the disputed domain name was registered and is being used in bad faith.

For completeness, the Panel also notes that the Policy does not create a general prohibition on the use of domain names for genuine noncommercial criticism, provided that any such domain names contain a signal that the registrant is not affiliated with or authorized by the trademark owner. Such a signal is lacking in a domain name that is an exact match for that trademark, ipso facto, as this effectively and impermissibly impersonates the trademark owner.

The Panel finds that the second and third elements of the Policy have 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 <gracetame.com> be transferred to the Complainant.

/Andrew D. S. Lothian/

Andrew D. S. Lothian

Sole Panelist

Date: August 21, 2026