ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
ZeroRISC Inc. v. Katie Ormond
Case No. D2026-3113

1. The Parties

Complainant is ZeroRISC Inc., United States of America ("United States"), represented by Sidley & Austin LLP, United States.

Respondent is Katie Ormond, United States.

2. The Domain Name and Registrar

The disputed domain name <getzerorisc.com> (the "Domain Name") is registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 15, 2026. On July 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On July 17, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name, which differed from the named Respondent (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to Complainant on July 20, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on July 24, 2026.

The Center verified that the Complaint together with the amendment 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 Respondent of the Complaint, and the proceedings commenced on August 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 27, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on September 8, 2026.

The Center appointed John C. McElwaine as the sole panelist in this matter on September 10, 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 United States-based company that designs and supplies open-source silicon security technology, including an OpenTitan-based silicon root of trust, under the ZeroRISC name, and is headquartered in Boston, Massachusetts, United States.

Complainant does not rely on any registered trademark. Instead, Complainant asserts unregistered (common law) rights in the ZeroRISC mark (the "ZeroRISC Mark") arising from its continuous and prominent use of the name since 2023. Complainant's operates its website at "www.zerorisc.com".

The Domain Name was registered on May 1, 2026, years after Complainant began using the ZeroRISC Mark. The Domain Name has resolved to an active website, which presents itself as "zeroRISC," using Complainant's name, and includes the name of Complainant's founder.

Respondent is Katie Ormond, an individual listed as located in, United States, according to the registrant information disclosed by the Registrar. The Domain Name registration was initially masked behind a privacy service.

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 asserts that it develops and supplies open silicon security technology built on the OpenTitan open-source root of trust and has operated publicly under the ZeroRISC name since 2023. Complainant asserts that it was founded in April 2023 by original members of the OpenTitan project team, and publicly launched on October 30, 2023 with USD 5 million in seed funding, as reported in the trade and business press, including Business Wire, VentureBeat, and Design & Reuse. Complainant further alleges that it has operated its website at "www.zerorisc.com" since 2023, has offered goods and services under the ZeroRISC name, and its founder and chief executive, is publicly associated with the ZeroRISC name and the OpenTitan project. Evidence of use and recognition of the ZERORISC Mark was provided as Annex 7 to the Complaint. Complainant contends that, through continuous and prominent use since 2023, the ZeroRISC name has acquired distinctiveness and now serves as a source identifier that the relevant public associates with Complainant, as confirmed by extensive media and industry recognition, and that Complainant accordingly holds enforceable common law rights in the ZERORISC Mark.

With respect to the first element of the Policy, Complainant contends that the Domain Name is confusingly similar to the ZERORISC Mark. Complainant asserts that the Domain Name reproduces the ZERORISC Mark in full, merely prefixing the dictionary word "get" and appending the ".com" generic Top-Level Domain, and that the mark remains clearly recognizable within the Domain Name. Complainant argues that the addition of the term "get," a common solicitation prefix, does not prevent a finding of confusing similarity, and that the generic Top-Level Domain is disregarded for purposes of this comparison.

With respect to the second element of the Policy, Complainant contends that Respondent has no rights or legitimate interests in respect of the Domain Name. Complainant states that it has not authorized, licensed, or otherwise permitted Respondent to use the ZERORISC Mark or to register any domain name incorporating it, that Respondent is not commonly known by the Domain Name, and that Respondent appears to be a fictitious entity hiding behind a privacy service. Complainant alleges that Respondent is operating a website that impersonates Complainant. Through the website and Domain Name, Respondent

presents itself as "zeroRISC," reproduces Complainant's name, stylization, and a version of its logo, names Complainant's founder (accompanied by a photograph of an unknown person presented as him), reproduces Complainant's OpenTitan origin story and a fabricated seed-funding announcement mirroring Complainant's history, and populates the site with fabricated personnel, a false claim of FIPS 140-3 Level 3 certification, and forms that solicit visitors' names, employers, job titles, and work email addresses. Complainant asserts that the use of a domain name to impersonate a complainant or for other illegitimate activity, including passing off, can never confer rights or legitimate interests.

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 asserts that the Domain Name was created years after Complainant began using the ZERORISC Mark and that the content of the website leaves no doubt that Respondent knew of and targeted Complainant. Complainant argues that Respondent has intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion with the ZERORISC Mark, that Respondent's impersonation, fabricated personnel, false certification claim, and data-harvesting forms are consistent with a phishing or fraudulent-solicitation purpose, and that Respondent's use of a privacy service to mask its identity together with false and internally inconsistent contact details further confirms bad faith.

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

Even though Respondent has defaulted, paragraph 4 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 ("WIPO Overview 3.1"), section 1.7.

Complainant does not own a trademark registration for the ZERORISC Mark and relies on unregistered, or common law, rights. To establish unregistered or common law trademark rights for purposes of the Policy, a complainant must show that its mark has become a distinctive identifier that consumers associate with complainant's goods or services, i.e., that it has acquired secondary meaning. WIPO Overview 3.1, section 1.3. Relevant evidence includes the duration and nature of use of the mark, the amount of sales, the nature and extent of advertising, and consumer and media recognition. Here, the Panel finds that Complainant has established unregistered trademark rights in the ZERORISC Mark for the purposes of the Policy.

Complainant has used the ZeroRISC name continuously since its public launch in 2023 to identify its goods, services, and website at "www.zerorisc.com", and the record demonstrates that the name has garnered substantial media and industry recognition denoting Complainant as a single source, including coverage by Business Wire, VentureBeat, Design & Reuse, and The Stack, and public association of Complainant and its founder with the name. Complainant also provided evidence that Respondent must have intentionally targeted Complainant by using Complainant's name and Complainant's founder's name. See WIPO Overview 3.1, section 1.3 ("The fact that a respondent is shown to have been targeting the complainant's mark (e.g., based on the manner in which the mark is used on the related website […]) may also support the complainant's assertion and evidence that its mark has achieved significance as a source identifier.") In light of the use, recognition, and intentional targeting of Complainant's name and reputation by Respondent, the Panel finds that Complainant has sufficiently established unregistered trademark rights in the ZERORISC Mark for the purpose of the Policy.

The Panel further finds that the ZERORISC Mark is recognizable within the Domain Name. The Domain Name reproduces the ZERORISC Mark in its entirety, adding only the term "get" as a prefix. Although the addition of such a term may bear on the assessment of the second and third elements, the Panel finds that the addition of this term does not prevent a finding of confusing similarity between the Domain Name and the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8. See also *Compagnie Générale des Etablissements Michelin v. Nguyen Phuoc, Phuoc*, WIPO Case No. D2023-0204. The applicable generic Top-Level Domain, ".com," is viewed as a standard registration requirement and is disregarded under the first element confusing similarity test. WIPO Overview 3.1, section 1.11.1.

Accordingly, the Panel finds that the Domain Name is confusingly similar to a mark in which Complainant has rights. Complainant has satisfied paragraph 4(a)(i) of the Policy.

B. Rights or Legitimate Interests

Complainant must make a prima facie case that Respondent lacks rights or legitimate interests in the Domain Name, after which the burden of production shifts to Respondent to come forward with relevant evidence demonstrating rights or legitimate interests. See section 2.1 of the WIPO Overview 3.1. Here, Complainant has stated that it has not licensed or otherwise authorized Respondent to use its ZERORISC Mark or to register domain names incorporating the mark.

There is no evidence that Respondent has been commonly known by the Domain Name or that Respondent has acquired any trademark rights in the term "getzerorisc" or "zerorisc". To the contrary, the record indicates that the personnel, business identity, and contact details presented on Respondent's website do not correspond to any real person or business, so that there is no one who could be commonly known by the Domain Name. The only name associated with Respondent in the record is "Katie Ormond," which bears no connection to the Domain Name or to the ZERORISC Mark. Respondent has not come forward with an explanation for choosing the Domain Name, which consists of Complainant's distinctive ZERORISC Mark. Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the 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 Domain Name such as those enumerated in the Policy[1] or otherwise. Instead, the record demonstrates that Respondent has engaged in conduct that negates any claim to legitimate interests. Respondent has used the Domain Name to operate a website that impersonates Complainant, presenting itself as "zeroRISC," copying Complainant's trademark, displaying the name and a photograph purporting to depict Complainant's founder, reproducing Complainant's OpenTitan origin story and a fabricated seed-funding announcement, and populating the site with fictitious personnel and a false FIPS 140-3 Level 3 certification claim (which the NIST CMVP database

[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 contested 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."

confirms is unsupported). The website is soliciting visitors' names, employers, job titles, and work email addresses through "Request Datasheet" and "Schedule Briefing" forms and a purported "Partner Portal" login. Such conduct, carried out under Complainant's name and branding, is consistent with lead-harvesting or phishing purposes.

Panels have categorically held that the use of a domain name for passing off, phishing, or other types of fraud can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1. Respondent's provision of false or fraudulent contact information reinforces the conclusion that Respondent's use is neither bona fide nor legitimate. Respondent's use of the Domain Name is therefore not in connection with a bona fide offering of goods or services, nor a legitimate noncommercial or fair use, but rather a deceptive scheme that infringes Complainant's rights and seeks to mislead Internet users.

The Panel concludes that Complainant's unrebutted evidence establishes that Respondent has no rights or legitimate interests in the Domain Name. 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. Complainant used and publicized the ZERORISC Mark beginning in 2023, and the Domain Name was not created until May 1, 2026. The Domain Name reproduces the ZERORISC Mark in its entirety, and the associated website copies Complainant's name, founder's name, and corporate history. In these circumstances, it is inconceivable that Respondent registered the Domain Name without knowledge of Complainant and its rights, and the Panel finds that Respondent registered the Domain Name with Complainant's mark firmly in mind and with the intention of exploiting it. See *Accor v. Kristen Hoerl*, WIPO Case No. D2007-1722; WIPO Overview 3.1, section 3.2.1. There is no plausible explanation for Respondent's conduct other than a deliberate effort to impersonate Complainant.

The Panel further finds that the Domain Name is being used in bad faith. By operating a website that copies Complainant's identity, Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the ZERORISC Mark as to the source, sponsorship, affiliation, or endorsement of the website, which constitutes bad faith under paragraph 4(b)(iv) of the Policy.

Respondent's conduct goes well beyond registering a confusingly similar name. Respondent has populated the website with fabricated personnel, asserted a false FIPS 140-3 Level 3 certification, and deployed forms that harvest visitors' contact details in Complainant's name, conduct consistent with a phishing or fraudulent-solicitation purpose. UDRP panels have recognized that the use of a domain name for phishing, passing off, or other fraudulent activity is evidence of bad faith registration and use. WIPO Overview 3.1, sections 3.1.4 and 3.4. Such exploitation of Complainant's mark to lure customers constitutes bad faith use. *On AG, On Clouds GmbH v. Nguyen Luu*, *Withheld for Privacy Purposes, Privacy service provided by Withheld for Privacy ehf, Vuong Hoang, AN NGUYEN, NEO CORP., and Ngoc Tam Nguyen,* WIPO Case No. D2021-1714 ("the Panel's finding not only that the Respondents are infringing the Complainants' trademarks […] also runs afoul of principles articulated in sections 2.4 and 2.5 (including subsections) of the WIPO Overview is dispositive of [the issue of bad faith]"). Respondent's bad faith is further confirmed by its concealment of identity and its provision of false contact information. Respondent registered the Domain Name behind a privacy service and, on the associated website, published false and internally inconsistent contact details, including conflicting addresses — a third-party commercial office building in Cambridge, Massachusetts, and a New York location — and a telephone number in the fictitious 555 range. Panels have recognized that the use of a privacy or proxy service to hide the registrant's identity, coupled with the provision of false or fraudulent contact details, supports a finding of bad faith. WIPO Overview 3.1, section 3.6. See *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. D2000-0003. 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 <getzerorisc.com> be transferred to Complainant.

/John C. McElwaine/
John C. McElwaine
Sole Panelist
Date: September 24, 2026