

ADMINISTRATIVE PANEL DECISION

The Ohio State University v. mei juan zhang
Case No. D2026-3660

1. The Parties

The Complainant is The Ohio State University, United States of America (the “United States”), represented by FBT Gibbons LLP, United States.

The Respondent is mei juan zhang, China.

2. The Domain Name and Registrar

The disputed domain name <osujersey.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 August 14, 2026. On August 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 17, 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, DomainsByProxy LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 18, 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 August 24, 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 August 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 16, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 21, 2026.

The Center appointed Áron László as the sole panelist in this matter on September 23, 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 The Ohio State University, a state university established in Ohio, United States, in 1870. The Complainant is a well-respected institution of higher learning in the United States, having provided college and graduate level educational courses, collegiate sporting events and recreation programmes, and dramatic and musical entertainment events for over 150 years.

The Complainant's athletic programmes have a long history of success. The Complainant has an outstanding track record in baseball, basketball, and (American) football. Its athletic teams have also won national championships in various sports. The Complainant has established an extensive licensing programme for merchandise bearing its marks. The Complainant also spends significantly on advertising and promoting its academic and athletic programmes and its branded merchandise.

The Complainant is the owner of numerous United States federal trademark registrations, including the following registrations for the mark OSU (the "Mark"):

- OSU, United States Registration No. 1121595, registered July 3, 1979;
- OSU, United States Registration No. 4035057, registered October 4, 2011;
- OSU, United States Registration No. 5358397, registered December 19, 2017.

The Complainant sells branded merchandise, including an extensive line of clothing apparel and accessories, through its e-commerce platform at <gobuckeyes.com>, which prominently features the Mark alongside the tagline "Ohio State Football Jerseys - Shop OSU Buckeyes". The Complainant also maintains a robust domain name portfolio, including <osu.edu> (the Complainant's main educational website), <ohiostatebuckeyes.com> (the Complainant's main athletics website), and <gobuckeyes.com> (the Complainant's main e-commerce website).

The disputed domain name <osujersey.com> was registered on October 25, 2020. The Respondent's registration details were initially concealed behind a privacy service (Domains By Proxy, LLC). According to the Registrar's verification response, the Respondent is mei juan zhang, purportedly located in Anhui, China.

At the time of the filing of the Complaint, the disputed domain name resolved to a website purporting to sell "official" merchandise branded with the Complainant's trademarks. The website described itself as "[t]he Official OSU Store" and offered football, basketball, and hockey jerseys for men, women, and children. The website contained no identifying information as to the operator of the website or the source of the products offered for sale. The Panel notes that jerseys of competing sports teams are advertised on the website.

The Respondent has previously been the subject of UDRP proceedings brought by the Complainant involving similar conduct. In *The Ohio State University v. Domains by Proxy, LLC / Mei Juan Zhang*, WIPO Case No. [D2022-2064](#), the panel ordered the transfer of the domain name <ohiostateproshop.com>. The panel found that the disputed domain name was confusingly similar to the Complainant's OHIO STATE mark, that the Respondent had no rights or legitimate interests, and that the disputed domain name had been registered and used in bad faith. The panel noted that the website to which that domain name resolved was "replete with merchandise prominently featuring the Complainant's trademarks" and included a copyright notice "© Ohio State Pro Shop 2003–2020. All Rights Reserved".

In *The Ohio State University v. gueijuan xu, mei juan zhang*, WIPO Case No. [D2024-1455](#), the panel ordered the transfer of the domain names <ohiostateshopnow.com> and <ohiostateteamshop.com>. The panel found that the Respondent's websites purported to offer the Complainant's branded products at substantially discounted prices, gave no information as to the identity of the operator of the websites, and in the case of <ohiostateteamshop.com>, the website falsely stated it was "THE OFFICIAL TEAM SHOP OF BUCKEYE NATION". The panel concluded that the Respondent had no rights or legitimate interests and had registered and used the domain names in bad faith.

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.

With respect to the first element, the Complainant submits that the disputed domain name is confusingly similar to its registered OSU mark. The Complainant contends that the disputed domain name incorporates the Mark in its entirety and that the addition of the descriptive term "jersey" only increases confusion among consumers seeking OSU-branded clothing and accessories on the Internet. The Complainant cites *The Ohio State University v. Michael Vick*, WIPO Case No. [D2023-3175](#), in which the panel found that the addition of the words "football jerseys" to the OSU mark did not prevent a finding of confusing similarity.

With respect to the second element, the Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Complainant contends that the Respondent is neither a licensee nor an authorised reseller of OSU-branded goods and has no affiliation with the Complainant. The Complainant further contends that the Respondent fails to meet the requirements of the Oki Data test (*Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#)), as the Respondent uses the disputed domain name to sell infringing and competitive goods and fails to prominently disclose the Respondent's relationship (or absence of relationship) with the Complainant. The Complainant relies on the prior decision in *The Ohio State University v. gueijuan xu, mei juan zhang*, WIPO Case No. [D2024-1455](#), in which the panel reached a similar conclusion regarding the same Respondent's websites.

With respect to the third element, the Complainant submits that the Respondent registered and is using the disputed domain name in bad faith. The Complainant contends that the disputed domain name was registered on October 25, 2020, long after the Mark had become a well-known trademark, and that the Respondent tailored the website content to relate to the Complainant's famous athletic programmes, demonstrating knowledge of the Complainant's rights. The Complainant further contends that the Respondent's use of the disputed domain name to attract, for commercial gain, Internet users to a website by creating a likelihood of confusion with the Mark constitutes bad faith under paragraph 4(b)(iv) of the Policy.

The Complainant also points to the Respondent's involvement in prior UDRP proceedings as evidence of a pattern of bad faith conduct. Specifically, the Complainant notes that in *The Ohio State University v. Domains by Proxy, LLC / Mei Juan Zhang*, WIPO Case No. [D2022-2064](#), the panel ordered the transfer of <ohiostateproshop.com> from the same Respondent, and in *The Ohio State University v. gueijuan xu, mei juan zhang*, WIPO Case No. [D2024-1455](#), the panel ordered the transfer of <ohiostateshopnow.com> and <ohiostateteamshop.com>. The Complainant contends that the Respondent's repeated targeting of the Complainant's marks supports a finding of bad faith under paragraph 4(b)(ii) of the Policy and further undermines any suggestion that the Respondent has made a bona fide offering of goods or has any legitimate interest in the disputed domain name.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to “decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable”.

Paragraph 4(a) of the Policy requires that a complainant must prove each of the following three elements to obtain an order that a domain name should be cancelled or transferred:

- i.the domain name registered by the respondent is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
- ii.the 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.

In view of the Respondent's failure to submit a Response, the Panel shall decide this dispute on the basis of the Complainant's undisputed representations pursuant to paragraphs 5(f), 14(a) and 15(a) of the Rules and draw such inferences as it considers appropriate pursuant to paragraph 14(b) of the Rules.

The Panel is entitled to accept all reasonable allegations set forth in a complaint. However, the Panel may deny relief where a complaint contains mere conclusory or unsubstantiated arguments. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.3.

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 3.1](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

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

Although the addition of other terms, here, “jersey”, may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

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 the Respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof in UDRP proceedings is on the 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 the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name. The Respondent has not rebutted the Complainant’s prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

The Respondent is neither a licensee nor an authorised reseller of OSU-branded goods and has no affiliation with the Complainant. The Respondent fails to meet the requirements of the Oki Data test (*Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#)), as the Respondent uses the disputed domain name to sell allegedly infringing and competitive goods (jerseys of other sports teams) and fails to prominently disclose the nature of the Respondent’s relationship with the Complainant.

Panels have held that the use of a domain name for illegitimate activity, here, claimed passing off, 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

The Panel notes that, for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith.

In this case, the Panel has found that it is more likely than not that the Respondent was aware of the Complainant’s marks when registering the disputed domain name, given that the Complainant’s well-known trademarks predate the disputed domain name by decades.

Furthermore, the Respondent makes heavy use of the Complainant’s imagery, logos and signs to create the false impression of an affiliation with the Complainant, despite not being an approved licensee or seller. Furthermore, the Respondent’s website advertises jerseys of competing sports clubs. These circumstances lead the Panel to conclude that the Respondent is acting in bad faith by impersonating the Complainant and intentionally attempting to attract Internet users by creating a likelihood of confusion with the Complainant’s mark.

Moreover, the Respondent has been involved in two very similar UDRP cases where the respective domain names were transferred from the Respondent to the Complainant in circumstances that are very similar to those in this case. UDRP panels have held that establishing a pattern of bad faith conduct requires more than one, but as few as two instances of abusive domain name registration. [WIPO Overview 3.1](#), section 3.1.2. This establishes a pattern of bad faith conduct on the part of the Respondent.

Panels have held that the use of a domain name for illegitimate activity, here, claimed passing off, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain name constitutes bad faith under the Policy.

The Panel finds that the 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 disputed domain name <osujersey.com> be transferred to the Complainant.

/Áron László/

Áron László

Sole Panelist

Date: October 7, 2026