ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Wikimedia Foundation, Inc. v. Domain Admin, HugeDomains.com
Case No. D2026-3664

1. The Parties

Complainant is Wikimedia Foundation, Inc., United States of America ("United States"), represented by Zacco Sweden AB, Sweden.

Respondent is Domain Admin, HugeDomains.com, United States, internally represented.

2. The Domain Name and Registrar

The disputed domain name <wikiadvisors.com> (the "Domain Name") is registered with TurnCommerce, Inc. DBA NameBright.com (the "Registrar").

3. Procedural History

The Complaint was originally filed in relation to ten disputed domain names with the WIPO Arbitration and Mediation Center (the "Center") on August 18, 2026. On August 20, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On August 20, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which partially differed from the named Respondent (REDACTED FOR PRIVACY, Domain Admin / This Domain is For Sale, HugeDomains.com) and contact information in the Complaint. The Center sent an email communication to Complainant on August 24, 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. Complainant filed an amendment to the Complaint on August 28, 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 September 4, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 24, 2026. The Response was filed with the Center on September 4, 2026. Complainant submitted unsolicited supplemental filings on September 15, 2026, to which Respondent replied on the same day. Upon Complainant's request, the administrative proceeding is terminated as regards the other nine disputed domain names on September 25, 2026.

The Center appointed Kimberley Chen Nobles, Robert A. Badgley, and Tony Willoughby as panelists in this matter on October 23, 2026. The Panel finds that it was properly constituted. Each member of 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

Founded in 2003, Complainant, a nonprofit charitable organization, is involved in the promotion, development, and distribution of free, multilingual, and educational content. Complainant manages free knowledge projects built and maintained by a community of active volunteers. Such projects include Wikipedia, a free, online encyclopedia compiled, edited, and maintained by over 115,000 active contributors known as the "Wikimedia movement."

Complainant owns numerous registered trademarks in various jurisdictions for the WIKIPEDIA mark, including:

- United States registered trademark number 3,040,722 for the WIKIPEDIA word mark, registered on January 10, 2006 for "providing information in the field of general encyclopedic knowledge via the internet";

- United States registered trademark number 3,505,429 for the WIKIPEDIA word mark, registered on September 23, 2008 for "providing online publications in the form of encyclopedias…." etc.; and

- United States registered trademark number 3,773,952 for the WIKIPEDIA word mark, registered on April 13, 2010 for mouse pads, magnets, clocks, stickers, tote bags, mugs and like items.

Complainant's trademarks will hereinafter be referred to as the "WIKIPEDIA mark".

Complainant also owns and operates the domain name <wikipedia.org>, registered on January 13, 2001, as well as other domain names that incorporate the WIKIPEDIA mark, including: <wikipedia.org>, <wikipediaarticle.org>, and <wikiartpedia.org>.

Respondent is the owner of a Colorado, United States-based domain name investment and resale company. The Domain Name was registered on October 31, 2020, and resolved to a website where it is offered for sale by Respondent for USD 4,595, with financing options, domain delivery information, secure shopping information, and other resale content.

One of the other disputed domain names included in the Complaint was <wikiadvisers.com>. Following registrar verification the contact name identified for that domain name was a third party with an address in Washington State.

5. Parties' Contentions

Complainant alleges that the term "wiki" is often associated with WIKIPEDIA, alludes to Complainant's trademarks and that the use of "wiki" is confusingly similar to its WIKIPEDIA trademarks.

Respondent argues that it acquired the Domain Name in 2020 in the ordinary course of its domain-investment business, and the Domain Name consists of two terms comprising independent and obvious meanings, that are different from Complainant's business and trademark use. Respondent further adds that it has not operated any services related to Complainant's Wikipedia business, promoted or displayed Complainant's Wikimedia branding, represented an affiliation with Complainant, solicited Complainant, or engaged in conduct demonstrating that the Domain Name was selected because of Complainant's WIKIPEDIA trademarks or Wikimedia brand.

A. Complaint (filed August 18, 2026, amended August 28, 2026):

The original Complaint was filed against ten disputed domain names, which Complainant alleged are identical or confusingly similar to its WIKIPEDIA trademarks. Complainant claimed rights in the WIKIPEDIA mark based on its trademark registrations noted above and that the addition of a generic term to part of its WIKIPEDIA mark, i.e., WIKI, increases rather than mitigates the potential risk of confusion.

Complainant also asserted that while the Domain Name did not resolve to a website, Complainant included it because of its similarity to another disputed domain name, <wikiadvisers.com>, in the group of registrants in the original Complaint.

Complainant asserted that Respondent had no rights or legitimate interests in the Domain Name and that it was registered and used in bad faith. On this last point, the Complaint argued that the Domain Name, while inactive, can still be considered as being used in bad faith based on the totality of the circumstances considered relevant in applying the passive holding doctrine in accordance with the WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.7, including the degree of distinctiveness or reputation of Complainant's mark, (ii) the failure of Respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, (iii) Respondent's concealing its identity or use of false contact details, and (iv) the implausibility of any good faith use to which the Domain Name may be put.

Upon receiving updated verification information from the corresponding registrars regarding the underlying registrants, Complainant amended its complaint on August 28, 2026 to reflect the names of the updated registrants. In addition, Complainant requested consolidation of the respondents as it argued that all are likely part of the same organization because the respondents engage in similar conduct and activities, and Complainant has reason to believe they are all part of the same organization.

As mentioned above, one of those disputed domain names was <wikiadvisers.com> held in the name of a third party with an address in Washington State. The amended Complaint sets out Complainant's evidence against the third party and the disputed domain name <wikiadvisers.com> observing that the third party has been a respondent in a previous case under the Policy involving targeting of Complainant where consolidation was granted. The next following paragraphs read:

"<wikiadvisors.com> and <wikiadvisers.com> are different only by one letter, which suggests that both are in fact owned by [the above-referenced third party] or a person/entity connected to [them].

In addition, Complainant attaches a screenshot from Google transparency Center (Annex 9) demonstrating that the registrant of <wikititans.com> uses the same Google advertising account, Morewish Digital LLC, as the registrants of <wikiadvisers.com> and <wikiadvisors.com> do."

B. Response (filed September 4, 2026):

In its Response, Respondent contested the Complaint and the amended Complaint, requested denial of consolidation of the named respondents, denial of transfer of the Domain Name and requested a finding of Reverse Domain Name Hijacking ("RDNH").

As grounds for denial of the Complaint, Respondent asserted that the Domain Name was registered by Respondent on October 31, 2020 for use in its own business in a separate industry from Complainant and that it has not used the Domain Name to benefit itself based on Complainant's trademarks. Concerning its legitimate interests in the Domain Name, Respondent alleged that it is a domain name investment and resale company that has legitimately owned and used the Domain Name since 2020. Respondent argues that the Domain Name does not reproduce Complainant's WIKIPEDIA mark, but instead consists of the term "wiki", followed by the ordinary English word "advisors", which has no connection with Complainant's business.

In response to Complainant's allegations of bad faith registration and use, Respondent argues that Complainant did not establish that Respondent directed any sales or offer specifically to Complainant, priced the Domain Name by reference to Complainant, offered services provided by Complainant, claimed affiliation with Complainant, or otherwise sought to divert Internet users searching for Complainant's products or services.

C. Complainant's Request for Partial Termination of Complaint (filed September 8, 2026):

Complainant submitted a request to partially terminate the proceedings with regards the Domain Name without further explanation.

D. Respondent's Objection to Complainant's Request (filed September 8, 2026):

Respondent objected to Complainant's partial termination request, arguing that Complainant should not be allowed to avoid a finding of RDNH by withdrawing at this late stage. Respondent argued that it had filed its substantive Response to the Complaint, requested election of a three-member Administrative Panel, and paid the required three-member Panel fee.

Respondent argued that Complainant did not withdraw after registrar verification separately identified Respondent as a registrant that is separate and distinct from the other registrants. Respondent argues that Complainant instead continued to sweep Respondent to unrelated registrants and made additional allegations concerning Respondent and only sought to withdraw after forcing Respondent to incur the expense of filing a Response and requesting RDNH against Complainant.

E. Complainant's Reply to Respondent's Objection (Supplemental Filing filed September 15, 2026):

In response to the substantive allegations of RDNH, Complainant reiterated that it filed the Complaint in good faith, with no interest in acquiring the Domain Name improperly, or to harass Respondent.

Complainant noted that at the time of filing the amendment to the Complaint, Complainant requested consolidation due to Opaque WhoIs records, a historical pattern of utilizing multiple aliases by registrants, hidden underlying beneficial owners behind active but also parked, inactive, Pay-Per-Click or "for sale" landing pages, with typographical similarities in their domain names. Complainant also submits that its annex 9 submitted with the amendment to the Complaint included a misattribution of the disputed domain name <wikiadvisers.com> to Respondent's Domain Name <wikiadvisors.com> due to an innocent administrative error arising from the near-identical typographical nature of the two domain names. Complainant submits that upon receiving Respondent's Response clarifying the distinct registration history and ownership, Complainant acted immediately to seek withdrawal of the Complaint against Respondent, which indicates lack of bad faith and as a result, does not warrant a finding of RDNH.

Critical to this assertion, Complainant also claimed that it had a credible belief that domain names frequently change beneficial ownership or underlying client representation over time. Further, Complainant frequently encounters deceptive networks utilizing domain names registered years apart, even where common control is subsequently established. Complainant also alleges that it has to consolidate domain names where there are reasonable grounds to suspect common control so as "to protect the public effectively." For all of these reasons, Complainant asserted that a finding of RDNH is not warranted.

F. Respondent's Response to Complainant's Supplemental Filing (filed September 15, 2026):

Respondent's argued that Complainant's new explanations in the Supplemental Filing were not credible and that all necessary information about Respondent's rights, registration and use of the Domain Name was available after the Registrar's verification and identification of Respondent. Respondent reiterated that Complainant continued its pursuit of Respondent and only sought to withdraw after forcing Respondent to incur the expense of filing a Response, request and pay for a three-member Panel, and seeking a finding of RDNH against Complainant.

Respondent further reiterated that Complainant's conduct throughout the proceeding demonstrates bad faith, including the request for the withdrawal of its Complaint to extinguish Respondent's pending request for a determination under paragraph 15(e) of the Rules after Respondent has filed its Response and incurred the expense of a three-member Panel, which constitutes an abuse of process.

6. Discussion and Findings

Paragraph 4(a) of the Policy requires Complainant to 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.

Having considered the Complaint and the amendment to the Complaint, the Response, the various supplemental filings, 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 disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.7. Ownership of a trademark registration prima facie satisfies 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.

On this point, Complainant has provided evidence that it is the owner of the trademark registrations for WIKIPEDIA. The Domain Name utilizes "wiki", the dominant portion of Complainant's WIKIPEDIA trademark in which Complainant has rights, in combination with the dictionary term "advisors", which may result in confusing similarity between the Domain Name and Complainant's trademark. See section 1.9 of the WIPO Overview 3.1.

Accordingly, the Panel finds that the first element of the Policy has been established.

B. Rights or Legitimate Interests

Under paragraph 4(a)(ii) of the Policy, a complainant must make a prima facie showing that a respondent possesses no rights or legitimate interests in a disputed domain name. See, e.g., *Malayan Banking Berhad v. Beauty, Success & Truth International*, WIPO Case No. D2008-1393. Once a complainant makes such a prima facie showing, the burden of production shifts to the respondent, though the burden of proof always remains on the complainant. If the respondent fails to come forward with relevant evidence showing rights or legitimate interests, the complainant will have sustained its burden under the second element of the UDRP.
From the record in this case, it is evident that Respondent had registered and used the Domain Name in connection with its domain name investment and resale business, which is in a different industry from Complainant's business. Respondent's Domain Name does not reproduce Complainant's WIKIPEDIA mark in its entirety, but instead consists of "wiki" followed by the ordinary English word "advisors."

Firstly, the term "wiki" has a recognized meaning independent of Complainant's mark and rights, and is widely used to describe collaboratively editable websites, documentation systems, knowledge bases, and similar resources.

Secondly, the combination of these terms - "wiki" and "advisors", may describe uses unrelated to Complainant's activities and business, such as consultants in the field of wiki enterprises, collaborative documentation, wiki-based knowledge management platforms, implementation or administration of wiki software, or other collaborative information resources.

Finally, with regards to Respondent's rights and legitimate interests in the Domain Name, Respondent's domain-name investment and resale business constitutes a legitimate commercial activity where domain names are acquired for their independent commercial value rather than to exploit another party's trademark. See *Allocation Network GmbH v. Steve Gregory*, WIPO Case No. D2000-0016.

Accordingly, Complainant has not provided sufficient evidence supporting its prima facie case showing that Respondent lacks any rights or legitimate interests in the Domain Name.

The Panel concludes that Complainant has not met its burden under paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy provides a non-exhaustive list of circumstances indicating bad faith registration and use on the part of a respondent, namely:

"(i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or

(ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your website or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your website or location or of a product or service on your website or location."

Complainant alleged that Respondent is well acquainted with Complainant's WIKIPEDIA mark when they registered the Domain Name in 2020 and while the Domain Name resolved to a website where it is offered for sale, Respondent's registration and use of the Domain Name may be considered as bad faith based on the totality of the circumstances such as: (i) the degree of distinctiveness or reputation of the complainant's mark, (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, (iii) the respondent's concealing its identity or use of false contact details (noted to be in breach of its registration agreement), and (iv) the implausibility of any good faith use to which the domain name may be put.

Here, while Respondent admits that WIKIPEDIA is a well-known mark, it claims to have registered and used the term "wiki" in conjunction with a term with an independent meaning "advisors" in its domain name investment and resale business which is in an industry unrelated to Complainant's business activities.

Indeed, on its face, paragraph 4(b)(i) of the Policy requires that the Domain Name must have been registered to sell it to "complainant who is the owner of the trademark or service mark or to a competitor of that complainant." Such facts were never alleged to have existed. The Domain Name was ostensibly offered for sale to the general public in Respondent's ordinary course of business in the acquisition and resale of domain names, apparently and allegedly unrelated to Complainant's industry of knowledge and content-based business.

Therefore, the Panel finds that Respondent did not register or use the Domain Name in bad faith. WIPO Overview 3.1, section 3.8.

The Panel finds that the third element of the Policy has not been established.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if "after considering the submissions the Panel finds that the complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or was brought primarily to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding". The mere lack of success of the complaint is not itself sufficient for a finding of RDNH. WIPO Overview 3.1, section 4.16. In the Panel's opinion, the totality of the circumstances must be reviewed, on an objective basis, to determine whether the Complaint or amended Complaint was brought in bad faith.

In the present case, the Panel finds that Complainant's conduct warrants a finding of RDNH.

Here, the evidence demonstrates that Complainant was or should have been aware of Respondent's ownership and use of the Domain Name well before filing the request for partial termination of the proceedings as regards the Domain Name. By its own admission, Complainant has extensive experience in policing its WIKIPEDIA marks. And because of such experience, Complainant should know that holding a well-known "wiki" prefix in a Domain Name is not by itself indication of bad faith.

Moreover, Complainant knew from the outset that the Domain Name did not resolve to a website offering content upon which its allegations against other respondents in its Complaint and the amendment to the Complaint principally relied. Complainant expressly stated that the Domain Name was included because of its similarity to another disputed domain name in the original Complaint with a typographical difference. Following registrar verification, Complainant learned that the corresponding disputed domain names were registered to different registrants. Yet the amendment to the Complaint nevertheless asserts that their one-letter similarity "suggests" both are actually owned by the same person or a connected person. Complainant provides no evidence of ownership, corporate, contractual, communications, payment, or other evidence establishing such a relationship.

Complainant's ex post facto claim in its Supplemental Filing that it had a credible belief that there could have been a change in registration as domain names frequently change beneficial ownership or underlying client representation over time, and that Complainant frequently encounters deceptive networks utilizing domain names registered years apart, even where common control is subsequently established, is unconvincing. Such a circumstance is not only unsupported by the evidence but was or should have been known at the time the amendment to the Complaint was filed. Complainant filed its amendment to the Complaint acknowledging that the underlying registrants have different contact information and noted Respondent as being separately located in Colorado State, United States. Indeed, Complainant's own annex 8 (filed with the original Complaint) depicts the Domain Name resolving to a website where it is available for purchase through Respondent, alongside financing, delivery, security, and other ordinary resale information. The evidence does not indicate that Respondent provided Wikipedia-related services or trade upon an association with Complainant's Wikimedia network. In addition, Complainant's annex 9 (filed with the amendment to the Complaint) had referred to a different domain name <wikiadvisers.com>, which uses the same Morewish Digital LLC advertising account as other registrants of disputed domain names in the original Complaint. The annex does not show Respondent's use of such an advertising account, so as to justify Complainant's allegation that Respondent is part of the same group of deceptive registrants.

Complainant cited several decisions in its final submission in this case, including prior UDRP decisions in which this Complainant successfully convinced the panel to consolidate into one UDRP proceeding numerous domain names registered by several purportedly different nominal respondents. In those prior UDRP decisions, however, it appears from the opinion in each of those cases that the panel looked at each domain name and each nominal respondent and, based on its review of facts and reasonable inferences, concluded that each of the subject domain names was somehow under the control of a single person or entity, notwithstanding the presence of several nominally distinct respondents. Thus, to summarize by way of example, the panel found that Nominal Respondent ("NR") Alpha, who registered five of the ten domain names, could be linked to NR Beta (one domain name) by virtue of certain WhoIs information, and that NR Gamma (two domain names) could be linked to NR Alpha by virtue of their having been linked in a prior case, and that NR Delta (two domain names) could be linked to NR Beta by virtue of their identical website content, with the result that the panel could reasonably conclude, on a balance of probabilities, that there was a basis for consolidating all ten domain names and all four nominal respondents into a single UDRP proceeding.

In the present case, by contrast, Complainant attempted no such reasonable basis for linking this Respondent to all the other respondents named in this case. Instead, Complainant dragged this Respondent into a case in which, it appears from this record, this Respondent had no reason to being joined, with a number of registrants against whom Complainant made serious allegations of wrongdoing. As such, as far as this Respondent and this Domain Name is concerned, the Panel finds that Complainant's conduct was exceedingly careless and, in the Panel's view, rises to the level of RDNH.

For the avoidance of any doubt, and lest this Decision be misconstrued and thereby read too broadly, the Panel wishes to emphasize that it is Complainant's indiscriminate and baseless attempt to lump this Respondent into a broader dispute as if it were one in league with the other alleged malefactors that gives rise to the Panel's RDNH finding here.

Finally, in this proceeding, Complainant is represented by counsel who cited numerous UDRP decisions in support of its final submission. This shows that, at a minimum, Complainant's counsel is familiar with the UDRP system and with the methods of researching evidence and prior UDRP decisions. From an objective view of the facts, Complainant, employing experienced counsel, had to have known that Complainant was or should have been aware of Respondent's ownership and use of the Domain Name well before filing the request for partial termination of the proceedings as regards the Domain Name.

For the above reasons, the Panel finds that Complainant's conduct warrants a finding of RDNH.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Kimberley Chen Nobles/
Kimberley Chen Nobles
Presiding Panelist

/Robert A. Badgley/
Robert A. Badgley
Panelist

/Tony Willoughby/
Tony Willoughby
Panelist

Date: November 13, 2026