



Lena Meadowcroft)
P.O. Box 104)
Lutz, Fl 33548
lenameadowcroft@hotmail.com)
)
(Complainant))
)
v.)
)
Redacted for Privacy)
Privacy service provided by)
Withheld for Privacy ehf
Reykjavik, Capital Region, IS)
+354.4212434)
b2e184316918454ab6644a7dd850926b.protect@withheldforprivacy.com
)
(Respondent))
_____)

Domain Names In Dispute:
lenameadowcroft.com

**COMPLAINT IN ACCORDANCE WITH
THE UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY**

[1.] This Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy (UDRP), adopted by the Internet Corporation for Assigned Names and Numbers (ICANN) on August 26, 1999 and approved by ICANN on October 24, 1999, and the Rules for Uniform Domain Name Dispute Resolution Policy (UDRP Rules), with an effective date of July 31, 2015, and FORUM's Supplemental Rules (Supp. Rules). UDRP Rule 3(b)(i). In addition to the UDRP, UDRP Rules and FORUM's Supplemental Rules, there is a wide body of case law and numerous secondary sources available, which may be of assistance in understanding the procedural, evidentiary and other requirements of the UDRP.

[2.] **COMPLAINANT INFORMATION** (*Enter multiple named Complainants on separate lines*)

[a.] Name: *Lena Meadowcroft*

[b.] Address: *P.O. Box 104, Lutz, Fl 33548*
[c.] Telephone: *813-438-2020*
[d.] Fax: *none*
[e.] E-Mail: *LenaMeadowcroft@hotmail.com*

[3.] COMPLAINANT AUTHORIZED REPRESENTATIVE, IF ANY

[a.] None. Complainant is self represented.

UDRP Rule 3(b)(ii).

Complainant's preferred contact person for correspondence relating to this case:

[a.] Contact Name(s): *Lena Meadowcroft 813-438-2020*
[b.] Contact Emails(s): *LenaMeadowcroft@hotmail.com*

UDRP Rule 3(b)(iii).

The Complainant chooses to have this dispute heard before a (check one):

X *single-member administrative panel;* *three-member administrative panel].*
UDRP Rule 3(b)(iv).

[If Complainant elects to have this dispute heard before a three-member panel, Complainant must provide the names and contact details of three candidates from any ICANN-approved Provider's list of panelists to serve as one of the panelists.] UDRP Rule 3(b)(iv).

[4.] RESPONDENT INFORMATION (*FORUM will provide the underlying registration details including the name of the registrant upon receiving these details from the registrar. If the registrant information provided by the registrar is different from the respondent information included here, FORUM will require an amended complaint to include the updated Registrant details.*)

[a.] Name: *Redacted for Privacy,*
Privacy service provided by Withheld for Privacy ehf
[b.] Address: *Reykjavik, Capital Region, IS*
[c.] Telephone: *+354.4212434*
[d.] Fax: *none*
[e.] E-Mail: *b2e184316918454ab6644a7dd850926b.protect@withheldforprivacy.com*

[5.] RESPONDENT AUTHORIZED REPRESENTATIVE, IF KNOWN

[a.] None known.

No evidence indicates the Respondent has designated a representative.

UDRP Rule 3(b)(v).

[In this section, please include any arguments you are making with respect to FORUM Supplemental Rule 1(d).]

If there are multiple named respondents, explain how the evidence contained herein demonstrates that the entities, which control the domain names at issue are effectively controlled by the same person and/or entity, operating under several aliases.].

[6.] **DISPUTED DOMAIN NAME(S)**

[a.] **Preliminary Issues**

*This case involves clear and deliberate **cybersquatting**. The Respondent registered the domain name lenameadowcroft.com, which is identical to Complainant's federally registered trademark and legal name, for the sole purpose of causing harm to Complainant. Respondent is publishing defamatory and harassing content, including private information and references to a dismissed legal matter, in order to target and damage Complainant's professional and personal reputation.*

Multiple U.S.-based hosting providers removed Respondent's website for abusive conduct. Respondent subsequently moved the site to offshore hosting to evade enforcement and continue the malicious activity. This pattern of conduct demonstrates intentional targeting of Complainant's identity, willful infringement of her trademark rights, and ongoing efforts to prevent Complainant from using her own name as a domain.

*These facts establish that Respondent's registration and use of the disputed domain name constitutes **classic cybersquatting**, as recognized under UDRP precedent.*

[b.] The following domain name(s) is/are the subject of this Complaint: UDRP Rule 3(b)(vi).

LenaMeadowcroft.com

[c.] Registrar Information: UDRP Rule 3(b)(vii).

- [i.] Registrar's Name: *Name Cheap, Inc.*
- [ii.] Registrar Address: *As listed on NameCheap WHOIS*
- [iii.] Telephone Number: *+1.661.310.2107*
- [iv.] E-Mail Address: *abuse@namecheap.com*

[d] Trademark/Service Mark Information: UDRP Rule 3(b)(viii).

*Complainant owns a U.S. federal trademark for the name "**Lena Meadowcroft**" and uses this mark extensively in real estate investment, business consulting, coaching, public speaking, ministry, and nonprofit services. The mark is well-established and recognized through social media, branding, websites, and public engagements. Complainant has significant public visibility, with over 6,000 followers online and more than 1,000 followers within real estate networks.*

[7.] FACTUAL AND LEGAL GROUNDS

This Complaint is based on the following legal grounds and factual evidence under UDRP Policy ¶4(a).

[7.a.] Identical or Confusingly Similar – UDRP ¶4(a)(i)

The disputed domain name **lenameadowcroft.com** is **identical** to Complainant's registered trademark. It wholly incorporates the mark with no alteration, and the ".com" top-level domain does not affect the analysis of confusing similarity. Respondent's use of the exact trademarked name ensures that Internet users will mistakenly believe the domain is owned, operated, or endorsed by Complainant.

[7.b.] No Rights or Legitimate Interests – UDRP ¶4(a)(ii)

Respondent has **no rights or legitimate interests** in the disputed domain name. Respondent:

- is not commonly known by the domain name,
- is not affiliated with Complainant,
- has never been authorized to use Complainant's trademark, and
- is using the domain for harmful and unlawful purposes.

Respondent is publishing defamatory and slanderous material, including private personal information and references to a dismissed court case, in order to damage Complainant's reputation and interrupt her business activities. This conduct is not a bona fide offering of goods or services, nor a legitimate noncommercial or fair use.

The fact that multiple U.S. hosting providers removed Respondent's content for violations further confirms the absence of any legitimate interest. Respondent subsequently secured offshore hosting to continue the harmful conduct, demonstrating malicious intent rather than any valid purpose.

[7.c.] Registered and Used in Bad Faith – UDRP ¶4(a)(iii)

Respondent's registration and use of the domain name demonstrate **bad faith** under multiple provisions of UDRP ¶4(b), and the overall conduct constitutes **clear cybersquatting**, including:

1. Targeting Complainant's exact trademark and identity

Registering the exact full name of a known individual with a registered trademark shows intentional targeting, not coincidence.

2. Intentional harm and disruption of Complainant's business (UDRP ¶4(b)(iii))

Respondent uses the domain to publish defamatory statements, private information, and misleading content intended to disrupt Complainant's real estate, consulting, and ministry activities.

3. Attempt to prevent Complainant from using her own trademark (UDRP ¶4(b)(ii))

Respondent registered the exact trademarked name to block Complainant from controlling her own brand online.

4. Use of false or shielded identity to evade accountability

Respondent employed an Iceland-based privacy service and moved the website to offshore hosting after multiple takedowns, indicating intentional concealment and malicious continuation of abuse.

5. Extortionary or coercive implications (UDRP ¶4(b)(i))

Respondent's conduct indicates an intent to interfere with Complainant's rights and potentially leverage the domain name against her.

6. Use of the domain for harassment and reputational damage

Publishing defamatory content, dismissed legal case material, and personal information is a hallmark of cybersquatting cases involving harassment.

7. Ongoing pattern of abusive registration and hosting evasion

The repeated removal of the domain by reputable hosting providers for policy violations shows Respondent's knowledge of wrongdoing and constitutes strong evidence of bad faith.

Taken together, these facts establish that Respondent registered the domain name **in bad faith**, **uses it in bad faith**, and engages in conduct consistent with long-recognized forms of **cybersquatting, harassment, and malicious targeting** under UDRP jurisprudence.

[8.] REMEDY SOUGHT

The Complainant requests that the Panel issue a decision that the domain-name registration be *TRANSFERRED TO COMPLAINANT*. UDRP Rule 3(b)(x); UDRP Policy 4(i).

[9.] OTHER LEGAL PROCEEDINGS

Cease and desist actions are underway but no court action has been filed regarding this domain. No other UDRP decision has been issued concerning this domain. UDRP Rule 3(b)(xi).

[10.] MUTUAL JURISDICTION

The Complainant will submit, with respect to any challenges to a decision in the administrative proceeding canceling or transferring the domain name, to *[choose one jurisdiction]*:

a) *the location of the principal office of the concerned registrar* or
 b) *where the Respondent is located, as shown by the address(es) given for the domain name holder in the Whois Database at the time of the submission of the Complaint to FORUM.*
UDRP Rule 3(b)(xii).

[11.] CERTIFICATION

Complainant agrees that its claims and remedies concerning the registration of the domain name, the dispute, or the dispute's resolution shall be solely against the domain-name holder and waives all such claims and remedies against (a) FORUM and panelists, except in the case of deliberate wrongdoing, (b) the registrar, (c) the registry administrator, and (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

Complainant certifies that the information contained in this Complaint is to the best of Complainant's knowledge complete and accurate, that this Complaint is not being presented for any improper purpose, such as to harass, and that the assertions in this Complaint are warranted under these Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Respectfully Submitted,



[Signature]

Lena Meadowcroft
[Name]

November 13, 2025
[Date]

[Annex any documentary or other evidence, including a copy of the Policy applicable to the domain name(s) in dispute and any trademark or service mark registration upon which the complaint relies, together with a schedule indexing such evidence.] UDRP Rule 3(b)(xiv).

[The Complaint, not including annexed material, shall not exceed fifteen (15) pages.] FORUM Supp. Rule 4(a).

[The Complaint and Annexes shall be submitted electronically, in accordance with the electronic submission requirements listed in the Annex to the Supplemental Rules, to domaindispute@adrforum.com.] FORUM Supp. Rule 4(b).