

ADMINISTRATIVE PANEL DECISION

LEGO Holding A/S v. NPAig, LLC, 100ig.com
Case No. D2025-4363

1. The Parties

The Complainant is LEGO Holding A/S, Denmark, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondent is NPAig, LLC, 100ig.com, United States of America (“United States”).

2. The Domain Names and Registrar

The disputed domain names <ailegoland.com>, <legolandai.com>, <legolandai.digital>, <legolandai.top>, <legoland.bot> and <legolandobot.com> (the “Disputed Domain Names”) are registered with Dynadot Inc (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 23, 2025. On October 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On October 27, 2025, the Registrar transmitted by email to the Center its verification response, disclosing registrant and contact information for the Disputed Domain Names which differed from the named Respondent (REDACTED FOR PRIVACY, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 27, 2025, 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 October 29, 2025.

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 October 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 19, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on November 26, 2025.

The Center appointed Mariia Koval as the sole panelist in this matter on December 1, 2025. 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 a part of the Lego Group, which was founded in 1932 and is a company based in Billund, Denmark. The Complainant is one of the world leaders among toy manufacturers, namely it manufactures the toys, consisting mostly of interlocking plastic bricks. Over the years, the Complainant's business of making and selling toys has grown remarkably: the Complainant has subsidiaries and branches throughout the world including five main hubs, 37 sales offices, five manufacturing sites and over 500 retail stores. The Complainant employs more than 28,500 individuals and its Lego products are sold in more than 130 countries, including the United States. The Lego Group has also built several family amusement parks around the world, focusing on the LEGO building.

The Complainant is the owner of a number of LEGO and LEGOLAND trademark registrations (collectively, the "LEGOLAND Trademarks") throughout the world, among which are:

- European Union Trade Mark No. 000039800 for LEGO, registered on October 5, 1998, in classes 3, 9, 14, 16, 20, 24, 25, 28, 38, 41, and 42;
- European Union Trade Mark No. 000054205 for LEGOLAND, registered on October 5, 1998, in classes 9, 16, 25, 28, 41, and 42; and
- United States Trademark Registration No. 3446087 for LEGOLAND, registered on June 10, 2008, in class 25.

The Complainant has built up a considerable online presence and is operating more than 6,000 domain names containing the LEGO Trademarks. The Complainant has also made substantial investments to develop a strong presence online by being active on various social-media platforms, including Facebook, Instagram, YouTube and LinkedIn.

The registration date of the Disputed Domain Names <legolandobot.com>, <legolandai.com>, <legoland.bot> and <ailegoland.com> is April 20, 2025; the registration date of the Disputed Domain Names <legolandai.top> and <legolandai.digital> is April 30, 2025. As at the date of this Decision, the Disputed Domain Names resolve to inactive websites. However, according to the evidence presented by the Complainant (Annex 11 to the Complaint), at the date the Complaint was filed, all Disputed Domain Names resolved to parked webpages, containing different pay-per-click ("PPC") links to third-party websites (with multiple links expressly referencing the Complainant).

In May and June, 2025, the Complainant sent to the Respondent cease and desist letters (Annex 12 to the Complaint) demanding that the Respondent cease all unauthorized use of its LEGOLAND Trademarks and transfer the Disputed Domain Names to the Complainant. No response has been received.

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 Names.

Notably, the Complainant contends that the Disputed Domain Names are confusingly similar to the Complainant's LEGOLAND Trademarks since the Disputed Domain Names reproduce the Complainant's LEGOLAND Trademarks in their entirety with the addition to the Disputed Domain Names <legolandobot.com>, <legolandai.digital>, <legolandai.top>, <legolandai.com>, and <ailegoland.com> of the

suffixes and/or prefixes “obot” and “ai”. These added suffixes and prefixes do not prevent a finding of confusing similarity between the Complainant’s LEGOLAND Trademarks and the Disputed Domain Names.

The Complainant further claims that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Names in view of the following:

- the Respondent has no registered trademarks or trade names corresponding to the Disputed Domain Names;
- no license or authorization of any other kind, has been given by the Complainant to the Respondent, to use the LEGOLAND Trademarks;
- there is no evidence that the Respondent is commonly known by the Disputed Domain Names;
- it is clear that the Respondent was aware of the Complainant’s rights in the LEGOLAND Trademarks at the time of the registration of the Disputed Domain Names; it is rather obvious that it is the fame of the LEGOLAND Trademarks that has motivated the Respondent to register the Disputed Domain Names;
- the Respondent is not using the Disputed Domain Names in connection with a bona fide offering of goods or services. Instead, the Respondent has intentionally chosen the Disputed Domain Names in order to generate traffic and income through websites with sponsored links;
- it is rather clear that the Respondent was trying to benefit from the Complainant’s world famous LEGOLAND Trademarks.

The Complainant further contends that the Respondent registered and is using the Disputed Domain Names in bad faith based on the following. The Complainant’s LEGOLAND Trademarks are famous worldwide. Notwithstanding that there is no connection between the Respondent and the Complainant, the Respondent has registered six Disputed Domain Names reflecting the LEGOLAND Trademarks. It is clear that the Respondent was aware of the rights the Complainant has in the LEGOLAND Trademarks and the value of them. By using the Disputed Domain Names the Respondent is not making a legitimate noncommercial or fair use, without intent for commercial gain. The Respondent was using the Disputed Domain Names to intentionally attempt to attract Internet users to websites for commercial gain, by creating a likelihood of confusion with the Complainant’s LEGOLAND Trademarks as to the source, sponsorship, affiliation or endorsement of the websites.

B. Respondent

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

6. Discussion and Findings

Under paragraph 4(a) of the Policy, a complainant to succeed must satisfy the panel that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights;
- (ii) the respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed domain name was registered and is being used in bad faith.

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 Selected UDRP Questions, Third Edition ([“WIPO Overview 3.0”](#)), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Disputed Domain Names <ailegoland.com>, <legolandai.com>, <legolandai.digital>, <legolandai.top> and <legolandobot.com> completely reproduce the Complainant's LEGOLAND Trademarks in combination with the suffixes and/or prefixes "ai" and "obot", and the generic Top-Level Domains ("gTLD") ".com", ".digital" and ".top". According to [WIPO Overview 3.0](#), section 1.8, where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element. In this case, the addition of the suffixes and prefixes "ai" and "obot" to the LEGOLAND Trademarks does not prevent a finding of confusing similarity. The Disputed Domain Name <legoland.bot> completely reproduces the Complainant's LEGOLAND trademark in combination with the gTLD ".bot".

Also, in accordance with [WIPO Overview 3.0](#), section 1.11.1, the applicable gTLD in a domain name (such as, ".com", ".club", ".nyc") is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test.

Pursuant to [WIPO Overview 3.0](#), section 1.7, in cases where a domain name incorporates the entirety of a trademark, the domain name will normally be considered identical or confusingly similar to that mark for purposes of UDRP standing.

Accordingly, the Panel finds that the Disputed Domain Names <ailegoland.com>, <legolandai.com>, <legolandai.digital>, <legolandai.top> and <legolandobot.com> are confusingly similar, and the Disputed Domain Name <legoland.bot> is identical, to the Complainant's LEGOLAND trademark pursuant to paragraph 4(a)(i) of the Policy.

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 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 3.0](#), 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 Names. 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 names such as those enumerated in the Policy or otherwise.

The Panel concludes that there is no relation, disclosed to the Panel or otherwise apparent from the record, between the Respondent and the Complainant. The Respondent is not a licensee of the Complainant, nor has the Respondent otherwise obtained an authorization to use the Complainant's LEGOLAND Trademarks. Moreover, there is no element from which the Panel could infer the Respondent's right over the Disputed Domain Names, or that the Respondent might be commonly known by the Disputed Domain Names.

In accordance with [WIPO Overview 3.0](#), section 2.5.1, where a domain name consists of a trademark plus an additional term, UDRP panels have largely held that such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. The composition of the Disputed Domain Names <legolandobot.com>, <legolandai.digital>, <legolandai.top>,

<legolandai.com>, and <ailegoland.com> – reproducing the entirety of the LEGOLAND Trademarks, along with the suffixes and/or prefixes “ai” and “obot” – carries a risk of implied affiliation with the Complainant.

The Disputed Domain Names were previously used to resolve to websites with PPC links to third-party websites, with some links expressly referencing the Complainant. In accordance with [WIPO Overview 3.0](#), section 2.9, panels have found that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant’s mark or otherwise mislead Internet users. Therefore, such use of the Disputed Domain Names by the Respondent does not amount to a bona fide offering of goods or services or a legitimate noncommercial or fair use.

The fact that the Respondent has incorporated the Complainant’s LEGOLAND Trademarks in their entirety in the Disputed Domain Names is further evidence that the Respondent was well aware of the Complainant’s LEGOLAND Trademarks at the time of registration of the Disputed Domain Names and has done so for the only purpose of creating an impression that the Disputed Domain Names are connected with the Complainant’s LEGOLAND Trademarks. Also, the composition of the Disputed Domain Name <legoland.bot> – being identical to the LEGOLAND trademark – carries a high risk of implied affiliation with the Complainant (see [WIPO Overview 3.0](#), section 2.5.1).

The Respondent did not file any response to the Complaint and did not participate in these proceedings, as such, the Respondent did not present any evidence supporting any rights or legitimate interests in the Disputed Domain Names.

In view of the foregoing, the Panel finds that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Names and that the Complainant succeeds under the second element of paragraph 4(a) of the Policy.

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 the present case, the Panel concludes that the Disputed Domain Names were registered and are being used in bad faith in view of the following. The Complainant obtained the registration of the LEGOLAND Trademarks more than 25 years before the Respondent registered the Disputed Domain Names in 2025. Taking into account all circumstances of this case, the Panel finds that the Respondent was very well aware of the Complainant’s business and its LEGOLAND Trademarks when registering the identical and confusingly similar Disputed Domain Names that completely incorporate the Complainant’s LEGOLAND trademark. The addition of the prefixes and suffixes “ai” and “obot” to the Complainant’s LEGOLAND trademarks in the Disputed Domain Names <legolandobot.com>, <legolandai.digital>, <legolandai.top>, <legolandai.com>, and <ailegoland.com>, as well as use of the LEGOLAND trademark alone in the Disputed Domain Name <legoland.bot>, is further evidence, that the Respondent was very well aware of the Complainant’s LEGOLAND Trademarks and business at the time of registration of the Disputed Domain Names and has done so for the only purpose of creating an impression that the Disputed Domain Names are connected with the Complainant’s LEGOLAND Trademarks. The Panel considers it is obviously bad faith that the Respondent deliberately chose the Disputed Domain Names to create a likelihood of confusion with the Complainant’s LEGOLAND Trademarks.

Previous use of the Disputed Domain Names for typical PPC websites showing a variety of hyperlinks to third-party websites, for a likely purpose of generating PPC revenue, in this case is a clear indication that the Respondent intentionally attempted to attract, for commercial gain, Internet users to its own websites by creating a likelihood of confusion with the Complainant’s LEGOLAND Trademarks as to the source, sponsorship, affiliation or endorsement of these websites. Such circumstances are evidence of registration and use of the Disputed Domain Names in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

In this context, UDRP panels widely agree that, particularly with respect to “automatically” generated PPC links, a respondent cannot disclaim responsibility for content appearing on the website associated with the disputed domain name, and that the fact that such PPC links are generated by a third party (e.g., the Registrar) would not by itself prevent a finding of bad faith. [WIPO Overview 3.0](#), section 3.5.

According to section 3.1.4 of the [WIPO Overview 3.0](#), UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. The Panel is of the opinion that it is clear that the Respondent, having registered and used the Disputed Domain Names <legolandobot.com>, <legolandai.digital>, <legolandai.top>, <legolandai.com>, and <ailegoland.com>, which are confusingly similar, and the Disputed Domain Name <legoland.bot>, which is identical, to the Complainant’s well-known LEGOLAND Trademarks, intended to disrupt the Complainant’s business and confuse Internet users seeking or expecting the Complainant’s websites. In view of the absence of any evidence to the contrary and the fact that the Respondent did not file any response to these proceedings, the Panel concludes that the Respondent has registered and is using the Disputed Domain Names in bad faith.

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 Names <ailegoland.com>, <legolandai.com>, <legolandai.digital>, <legolandai.top>, <legoland.bot> and <legolandobot.com> be transferred to the Complainant.

/Mariia Koval/

Mariia Koval

Sole Panelist

Date: December 15, 2025