

ADMINISTRATIVE PANEL DECISION

LEGO Holding A/S v. dqqd dqqd, Ragner Zynks, Felipe Nobre, Nancy Taylor,
Santos de Santos, Lucas Silva
Case No. D2025-0829

1. The Parties

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

The Respondents are dqqd dqqd , Ragner Zynks, Felipe Nobre, Nancy Taylor, Santos de Santos, LucasSilva, Brazil.

2. The Domain Names and Registrars

The disputed domain names <legobrasil.store>, <legostorebrasil.com>, and <store-legos.com>are registered with GoDaddy.com, LLC.

The disputed domain names <legodiasdascrianças.online>, <legostorebrasil.online>, <legostorebrasil.site> and <legostore-oficial.online> are registered with Hostinger Operations, UAB.

The disputed domain name <lego-brasil-store.com> is registered with NameSilo, LLC (the “Registrars”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 27, 2025. On February 28, 2025, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. On April 28, 2025 and March 3, 2025, the Registrars transmitted by email to the Center their verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondents (Domain Admin, Registration Private and Domain Administrator) and contact information in the Complaint.

The Center sent an email communication to the Complainant on March 10, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints 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. The Complainant filed an amended Complaint on March 13, 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 Respondents of the Complaint, and the proceedings commenced on March 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 7, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on April 8, 2025.

Due to an apparent issue with the notification, the Center granted the Respondents April 20, 2025, to indicate whether they wished to participate in the proceeding. The Respondents did not submit a reply. The Center appointed Fabrizio Bedarida as the sole panelist in this matter on April 29, 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 in this administrative proceeding is LEGO Holding A/S, a limited company incorporated in Denmark.

The Complainant has subsidiaries and branches throughout the world, and LEGO products are sold in more than 130 countries, including in Brazil, the United States of America (“United States”) and the European Union. The LEGO trademark and brand have been recognized as being famous.

The Complainant has a huge number of registrations for the LEGO trademark around the world including in Brazil, where the Respondents apparently reside. Indeed, the Complainant has provided a full list of trademarks registered in jurisdictions around the world.

The Complainant is, inter alia, the owner of Brazilian trademark LEGO (word), registration number 006707319 registered on June 25, 1978.

In addition, the Complainant is the owner of more than 6,000 domain names containing the trademark LEGO.

The trademark LEGO is among the best-known trademarks in the world.

The disputed domain names were registered between September 27, 2024, and October 9, 2024.

The disputed domain names <store-legos.com>, <legobrasil.store>, <legostorebrasil.com>, <legostorebrasil.online>, <legostorebrasil.site>, <legostore-oficial.online> and <legodiasdascrianças.online> currently resolve to inactive sites. The disputed domain name <lego-brasil-store.com> resolves to a generic website template and shows information unrelated to the Complainant and its services. The disputed domain name <store-legos.com> used to resolve to a website incorporating the Complainant’s trademark and logo.

The Complainant’s representatives sent cease and desist letters to the disputed domain name registrants, which remain unanswered

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 LEGO trademark, that the Respondents have no rights or legitimate interests in respect of the disputed domain names, and particularly that it is implausible that the Respondents were unaware of the Complainant's renowned trademark when they registered the disputed domain names.

Regarding the Respondents' identity, the Complainant has requested a consolidation of multiple disputed domain names and the Respondents.

B. Respondents

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

6. Discussion and Findings

6.1. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules mainly for the reasons below:

1. the Registrants are related to the extent that a sufficient unity of interest exists such that they may essentially be treated as a single domain name holder for the purposes of Policy paragraph 3(c) of the Rules;
2. all Registrants reside in Brazil;
3. seven out of eight of the disputed domain names share similar composition: LEGO trademark + additional terms "brasil" or "official" and/or "store";
4. all Registrants use generic "gmail.com" domains for email; all email prefixes contain a number and none of the email prefixes reflect the Registrant's name or organization;
5. all the disputed domain names were created within two weeks of each other;
6. all the disputed domain names were created using a privacy protection service;
7. some of the contact information is likely false. Specifically, Whois information for the disputed domain name <lego-brasil-store.com> is largely nonsensical, while Google searches for the address information shown in the disputed domain names <lego-brasil-store.com>, <legostorebrasil.com>, <store-legos.com> and <legostore-official.online> do not produce results;
8. the Registrant named in the Whois for disputed domain name <legodiasdascrianças.online> (Lucas Silva) has already been identified as an alias used to register a disputed domain name. (See *Vivara Participações S.A. v. Estrutura Vivara, Jhones Gomes Carvalho, Thiago Elias de Paula, Minha Loja, Douglas Ferreira da Silva, Lucas Silva, Juliano Joel Ruis Nogueira, Nayara Azevedo Azevedo, Paulo Macaubas and Adierlei dos Santos Fonseca* WIPO Case No. [D2024-1780](#));

9. consolidation of proceedings would be fair and equitable to all parties.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

As regards common control, the Panel notes that owing to the facts that; the Registrants of the disputed domain names are located in the same country; the Registrants use generic "gmail.com" domains for email and all of the email prefixes contain a number and none of the email prefixes reflect the Registrant's name or organization; the composition of the disputed domain names is similar; and all the disputed domain names were registered in a short period of time, finds that the disputed domain names identified in the Complaint, on the balance of probability, are registered by the same domain name holder or are at least under common control.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

6.2. Substantive Issues

In order for the Complainant to obtain a transfer of the disputed domain names, paragraph 4(a) of the Policy requires that the Complainant must demonstrate to the Panel that:

- (i) the disputed domain names are 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 disputed domain names; and
- (iii) the disputed domain names have been registered and are 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 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 Panel finds the mark is incorporated entirely and recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of the other terms here, "brasil", "store", "oficial" and "dias das crianças" (i.e., "children's days" in Portuguese), may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), 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 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.

Based on the available record, 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 the present case, the Panel notes that Respondent was aware of the Complainant’s trademark registrations and rights to the LEGO trademark when it registered the disputed domain names.

LEGO is one of the world’s most renowned trademarks. The disputed domain names contain in its entirety, without any authorization or approval, the Complainant’s registered LEGO trademarks, and this is the only distinctive component of the disputed domain names.

The disputed domain names were registered many decades after the Complainant’s renowned trademark was registered. In addition, owing to the substantial presence established worldwide and on the Internet by the Complainant, it is at the least very unlikely that the Respondent was not aware of the existence of the Complainant’s trademarks when registering the disputed domain names.

Therefore, it is more likely than not that the Respondent, when registering the disputed domain names, had knowledge of the Complainant’s earlier rights to the LEGO trademark and trade name and targeted those.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent’s registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

The bad faith registration of the disputed domain names is also affirmed by the fact that the Respondent has clearly given (at the very least) incorrect and/or partial details for the registration of the majority of the disputed domain names: e.g. <lego-brasil-store.com> (First Name; dqdq, Last Name: dqdq dqdq).

Further inference of bad faith registration and use of the disputed domain is given by the facts that: the Respondent used a privacy Whois service for the registration of the disputed domain names; the Respondent did not respond to the Complainant's cease and desist letters nor to the Complaint in the present proceeding; the Respondent is passively holding the disputed domain names; and the Respondent incorporated one of the world's most renowned trademarks into the disputed domain names with no plausible explanation for doing so.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. Having reviewed the available record, the Panel finds the non-use of some of the disputed domain names does not prevent a finding of bad faith in the circumstances of this proceeding. Although panelists will look at the totality of the circumstances in each case, factors that have been considered relevant in applying the passive holding doctrine include: (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, and (iii) the respondent's concealing its identity or use of false contact details (noted to be in breach of its registration agreement). [WIPO Overview 3.0](#), section 3.3.

Having reviewed the available record, the Panel notes the distinctiveness or reputation of the Complainant's trademark, the composition of the disputed domain names, the Respondent's concealing its identity when registering the disputed domain names and finds that in the circumstances of this case the passive holding of the disputed domain names does not prevent a finding of 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 names <legobrasil.store>, <lego-brasil-store.com>, <legodiasdascrianças.online>, <legostorebrasil.com>, <legostorebrasil.online>, <legostorebrasil.site>, <legostore-oficial.online>, <store-legos.com> be transferred to the Complainant.

/Fabrizio Bedarida/

Fabrizio Bedarida

Sole Panelist

Date: May 5, 2025