

ADMINISTRATIVE PANEL DECISION

LEGO Holding A/S v. Domain Administrator, Fundacion Privacy Services LTD
Case No. D2025-0960

1. The Parties

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

The Respondent is Domain Administrator, Fundacion Privacy Services LTD, Panama.

2. The Domain Names and Registrar

The disputed domain names <leggoland.com>, <legoeducation.com>, <legoraceoffer.com>, <legosurvey.com>, <legosurvey.com>, <legosurvey.com>, and <leg0.com> are registered with Media Elite Holdings Limited (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 10, 2025, regarding the disputed domain name <leggoland.com>. On March 10, 2025, the Center transmitted by email to the Registrar the request for registrar verification in connection with the disputed domain name <leggoland.com>. On March 12, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name <leggoland.com> which differed from the named Respondent (Not Shown, Carolina Rodrigues /FCS Holdings Corp) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 13, 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 the amended Complaint on March 20, 2025, requesting to add six other disputed domain names to the proceeding. On March 20, 2025, the Center transmitted by email to the Registrar the request for registrar verification in connection with the additional six disputed domain names. On March 20, 2025, the Registrar transmitted by email to the Center its verification response confirming the Respondent is the registrant for the additional six disputed domain names and providing contact information. On March 21, 2025, the Center sent an email communication to the Complainant, providing the registrant and contact information disclosed by the Registrar regarding the six additional disputed domain names. On March 26, 2025, the Complainant filed the second amended Complaint.

The Center verified that the Complaint together with the amended Complaints 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 March 27, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 16, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 22, 2025.

The Center appointed Reyes Campello Estebaranz as the sole panelist in this matter on April 28, 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 Danish company that produces and commercializes internationally construction toys and other products and services branded under the trademarks LEGO and LEGOLAND. The Complainant has expanded its use of the LEGO mark to, inter alia, computer hardware and software, books, videos and computer controlled robotic construction sets, and its LEGOLAND mark is used regarding, inter alia, theme parks, hotels, entertainment, sporting and cultural activities, albeit the LEGOLAND theme parks are today owned by Merlin Entertainments, which is participated by the Complainant’s group. Per the Complaint, the Complainant has subsidiaries and branches throughout the world, its products are sold in more than 130 countries (including Panama), and its LEGOLAND parks have about 1.4 million visitors per year.

The Complainant owns multiple trademark registrations for LEGO and LEGOLAND,¹ which provide protection in many jurisdictions including Panama (where the Respondent is apparently located according to the Registrar verification), including Panama Trademark Registration No. 23438, LEGO, registered on June 11, 1979, in class 28; and Panama Trademark Registration No. 28138, LEGOLAND, registered on March 2, 1982, in class 28.

Prior decisions under the Policy have recognized the international reputation and famous character of the LEGO mark.²

The Complainant further owns numerous domain names comprising its trademarks LEGO and LEGOLAND,³ including <lego.com> (registered on August 22, 1995) and <legoland.com> (registered on August 4, 1998), which are linked to its corporate websites for the goods and services related to these marks.

The disputed domain names were registered between May 17, 2001 and October 23, 2024 (as indicated in the following table), and, according to the evidence provided by the Complainant, most of the disputed domain names initially resolved to parked pages displaying promotional links to third parties’ websites or Pay-Per-Click (“PPC”) links, mostly unrelated to the Complainant and its LEGO brand, while the disputed domain name <leggoland.com> resolved to a parked page with no substantive content. Additionally, according to the evidence provided by the Complainant, <leggoland.com> and <legoeducation.com> included in their respective parked pages an indication to its possible purchase (“The domain leggoland.com

¹ On January 1, 2025, the Complainant was renamed, but it was previously named LEGO Juris A/S, and some of its trademark and domain name registrations are still on this prior company name.

²See, e.g., *LEGO Juris A/S v. Reginald Hastings Jr*, WIPO Case No. [D2009-0680](#); *LEGO Juris A/S v. M. Moench*, WIPO Case No. [DNL2009-0052](#); *LEGO Juris A/S v. Kang Zheng*, WIPO Case No. [D2010-1924](#); *LEGO Juris A/S v. Kim S J*, WIPO Case No. [D2014-0884](#); *LEGO Juris A/S v. Moshe Cohen / Funtasia Trade Ltd*, WIPO Case No. [D2019-2478](#); and *LEGO Juris A/S v. Paul Clark*, WIPO Case No. [D2024-0383](#).

³ See footnote number 1.

is for sale” or “The domain is for sale”); <leggoland.com> was listed at the GoDaddy’s platform for USD 2,499, and <legoeducation.com> was listed at the Sedo’s platform for a minimum USD 999 offer.

At the time of analyzing this case and drafting this decision, the Panel has verified that five of the disputed domain names still resolve to parked pages displaying promotional PPC links, mainly unrelated to the Complainant and its trademark. However, two of the disputed domain names resolve to blank pages, one displaying a reCAPTCHA clicking box to corroborate the human nature of the user; and, once the Internet user enters into these blank pages or clicks the reCAPTCHA box, unknown software (that antivirus software potentially describes as malware), is automatically downloaded into the user’s computer.

The following table summarizes the registration dates and current use of the disputed domain names:

Disputed Domain Name	Registration Date	Current Use
<leggoland.com>	May 17, 2001	Blank page with a reCAPTCHA clicking box (“I’m not a robot”) + automatic download of software (allegedly malware)
<leg0.com>	September 25, 2004	Blank page + automatic download of software (allegedly malware)
<legosuvey.com>	January 6, 2012	Parked page containing PPC links
<legoservey.com>	January 12, 2012	Parked page containing PPC links
<legosurvey.com>	January 12, 2012	Parked page containing PPC links
<legoeducation.com>	October 11, 2023	Parked page containing PPC links
<legoraceoffer.com>	October 23, 2024	Parked page containing PPC links

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 the disputed domain names are confusingly similar to its famous trademarks. Two of the disputed domain names are purposeful misspellings of its trademarks, and, as such, are prototypical examples of typosquatting, <leggoland.com> that includes an additional letter “g” (double “gg” instead of a single letter “g”), and <leg0.com> that replaces the letter “o” with the number “0” (which is visually similar). The other five disputed domain names comprise a generic term suffix or a purposeful misspelling of a generic term suffix (“education”, “race offer”, “servey”, “survey” and “suvey”), which do not avoid the confusing similarity. The generic Top-Level Domain (“gTLD”) “.com” is further irrelevant in determining the confusing similarity.

The Complainant further contends the Respondent has no rights or legitimate interests in the disputed domain names. The Respondent is not commonly known and owns no trademark rights or trade names over the terms “lego” or “legoland”, it has no authorization to use the LEGO or LEGOLAND marks, and the Parties have no relationship. The disputed domain names have not been used in connection with any bona fide offering of goods or services, but to generate traffic through confusion or affiliation and redirect users to pages that lack content or displayed PPC promotional links, and two of the disputed domain names are being offered for sale at prices that exceed their out-of-pocket registration expenses.

The Complainant finally contends the disputed domain names were registered and are being used in bad faith. Due to the fame of the LEGO brand, the Respondent cannot reasonably claim to have registered and used the disputed domain names in good faith without being aware of the Complainant's rights, and typosquatting in itself is evidence of targeting and bad faith. The Respondent is engaged in a pattern of bad faith registration and use of domain names that target the Complainant and its trademark;⁴ or that target other third parties' reputed trademarks and have been already transferred to their rightful owners by prior UDRP cases;⁵ and it currently holds over 53,000 domain names, several of which misappropriate other well-known brands.⁶ The use of the disputed domain names to generate traffic through confusion or affiliation to the reputed LEGO mark for a commercial gain, or to profit from the sale at prices that exceed their registration costs, are further evidence of bad faith. The apparent non-use of the disputed domain name <leggoland.com> does not alter this conclusion, as bad faith under the Policy does not require a positive act on the part of the Respondent, and passively holding can constitute a factor in finding bad faith. A further indication of the Respondent's bad faith is the use of the name of a privacy provider company as the underlying registrant for the disputed domain names, in an extra effort to shield its true identity and its illegitimate conduct from a UDRP proceeding (the so called "Russian doll scenario").⁷

B. Respondent

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

6. Discussion and Findings

The Complainant has made the relevant assertions as required by the Policy and the dispute is properly within the scope of the Policy. The Panel has authority to decide the dispute examining the three elements in paragraph 4(a) of the Policy, taking into consideration all of the relevant evidence, annexed materials and allegations, and performing some limited independent research under the general powers of the Panel articulated, inter alia, in paragraph 10 of the Rules.

A. Preliminary issue: Addition of Domain Names prior to Complaint Notification

The Panel notes the Complainant added six disputed domain names not originally invoked in the Complaint, which are all held by the same registrant, and this addition took place before the Complaint notification.

The Panel finds the addition of these disputed domain names held by the same Respondent is fair and acceptable under the Policy. As a general rule, domain names held by the same registrant may be added to a complaint before notification to the respondent and formal commencement of the relevant proceeding. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.12.1.

B. 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 names. [WIPO Overview 3.0](#), section 1.7.

⁴The Complainant cites two prior UDRP cases: *LEGO Juris A/S v. Domain Administrator, Fundacion Privacy Services LTD*, WIPO Case [D2022-1344](#), and *LEGO Juris A/S v. Domain Administrator, Fundacion Privacy Services LTD*, WIPO Case [D2019-1440](#).

⁵The Complainant provides the first page of results of a search for prior UDRP cases of the same Respondent, with over 300 matches.

⁶The Complainant cites, e.g., <disneycrusieline.com>, <faceb00k.com>, <ferrarisale.com>, <microsoft635.com>, and <samsunggalaxybattery.com>.

⁷The Complainant cites *K7 Computing Private Limited v. Domain Admin, Privacy Protect, LLC / Domain Admin, TotalDomain Privacy Ltd*, WIPO Case [D2022-0733](#).

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

The Panel finds the mark LEGO is recognizable within all the disputed domain names, and the mark LEGOLAND is recognizable within the disputed domain name <leggoland.com>. Despite the use of common, obvious or intentional misspellings of the marks (an additional letter “g” or the substitution of the letter “o” by the number “0”), or the combination of the marks with terms (such as “race offer”) or with misspelling of terms (such as “education”, “servey”, “survery” and “suvey”), the LEGO and/or the LEGOLAND marks are recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7, 1.8, and 1.9.

Furthermore, as alleged by the Complainant, the gTLD “.com”, is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.

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

C. 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 finds the composition of the disputed domain names, and particularly the practice of typosquatting point to an intention of the Respondent to confuse Internet users seeking for or expecting the Complainant. Additionally, the use of the six out of seven disputed domain names in connection to PPC parked pages that promote third parties’ websites unrelated to the Complainant and its reputed trademarks at the time of filing the Complaint, further corroborates the lack of rights or legitimate interests in the Respondent, as well as its intent to mislead Internet users and illegitimately profit from the Complainant’s brand’s reputation. 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. [WIPO Overview 3.0](#), section 2.9. While the disputed domain name <leggoland.com>, at the time of filing the Complaint, resolved to a park page with no substantive content, such lack of use under the circumstances of this case does not confer any rights or legitimate interests on the Respondent.

The Panel further notes that the Respondent’s name provided by the registrar’s verification was doubly concealed under a privacy registration service, which has no resemblance with the terms included in the disputed domain names or the brands LEGO and LEGOLAND.

It is further remarkable two of the disputed domain names currently resolve to blank pages, one of them including a clicking - "I'm not a robot" - reCAPTCHA box, and, as verifying the disputed domain names' use, the Panel has noted when entering these sites, and/or clicking the said box, an automatic download of unidentified software identified as potential malware by an antivirus. If indeed these two disputed domain names were used for distribution of malware, panels have held that the use of a domain name for illegitimate or illegal activity, such as distribution of malware, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

All the above-mentioned circumstances lead the Panel to conclude that nothing in the case file gives reason to believe the Respondent has or has had any rights or legitimate interests in respect of the disputed domain names. Therefore, the Panel finds the second element of the Policy has been established.

D. 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.

The Panel finds all the circumstances of this case are indicative of the Respondent's bad faith under the Policy, in a clear targeting of the Complainant and its famous brands for an unfair commercial gain. Particularly relevant are, in this respect, (i) the famous character of the LEGO mark; (ii) the composition of the disputed domain names including obvious, common or intentional misspellings of the Complainant's marks and/or of the additional terms included in the disputed domain names in a clear case of typosquatting; and (iii) the use of most of the disputed domain names in connection to PPC links unrated to the Complainant or its trademarks, or for the purpose of selling (in two cases) the disputed domain names for prices exceeding the normal registration costs.

The disputed domain name <leggoland.com>, at the time of filing the Complaint, resolved to a park page with no substantive content. Considering the distinctiveness and reputation of the Complainant's trademarks and the composition of this disputed domain name, the Panel finds that the non-use of this disputed domain name under the circumstances of this case constitutes bad faith under the passive holding doctrine. [WIPO Overview 3.0](#), section 3.3.

Therefore, having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitutes bad faith under the Policy.

It is further remarkable the use of the name of a privacy registration service company as the underlining registrant for the disputed domain names, in an extra effort to conceal the Respondent's identity.

The Complainant has further provided strong evidence that characterizes the Respondent as a persistent cybersquatter (and typosquatter) that has targeted the Complainant and its trademarks (on at least two other occasions), as well as other well-known third parties' trademarks (on many occasions) with various domain names that were transferred to their respective legitimate owners through various prior UDRP cases. The Panel finds this fact constitutes a clear pattern of bad faith conduct under the Policy, in an attempt of preventing the Complainant and other trademark holders from reflecting their marks in corresponding domain names. [WIPO Overview 3.0](#), section 3.1.2.

Accordingly, the Panel finds the Complainant has met its burden of establishing that the disputed domain names were registered and are being used in bad faith and 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 <leggoland.com>, <legoeducation.com>, <legoraceoffer.com>, <legosurvey.com>, <legosurvey.com>, <legosurvey.com>, and <leg0.com> be transferred to the Complainant.

/Reyes Campello Estebarez/

Reyes Campello Estebarez

Sole Panelist

Date: May 12, 2025