

ADMINISTRATIVE PANEL DECISION

LegalZoom.com, Inc. v. kodevchu Soft, kodevchu.soft.com
Case No. D2025-2515

1. The Parties

The Complainant is LegalZoom.com, Inc., United States of America ("United States"), represented by Bryan Cave Leighton Paisner LLP, United States.

The Respondent is kodevchu Soft, kodevchu.soft.com, United States.

2. The Domain Name and Registrar

The disputed domain name <usalegalzoom.com> is registered with Hosting Concepts B.V. d/b/a Registrar.eu. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 26, 2025. On June 26, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 26, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Whois Privacy Protection Foundation) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 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 amendment to the Complaint on June 27, 2025.

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 the Respondent of the Complaint, and the proceedings commenced on July 1, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 21, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 23, 2025.

The Center appointed Phillip V. Marano as the sole panelist in this matter on July 30, 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 technology company that “for nearly twenty-five years” has offered “intellectual property registration, business entity formation and registration, online legal document preparation services, attorney listings, electronic signature services, virtual mail services, tax and accounting services, registered agent services, and other general legal services and information to support businesses.” The Complainant offers information about its goods and services on its official website at the domain name <legalzoom.com>. The Complainant owns valid and subsisting registrations for the LEGALZOOM trademark in the United States, including LEGALZOOM (United States Reg. No. 2,540,549), registered on February 19, 2002, with the earliest priority dating back to July 15, 2000.

The Respondent registered the disputed domain name on March 12, 2025. At the time of filing this Complaint, the disputed domain name resolved to a website titled “US Legal Zoom” which sought user contact information (name, email address, phone number) and advertised a “Free Consultation” to “Protect Your Brand, Simplify Registration [...] Register Your Trademark for \$45. Protect Your Brand With Our Simple Process.”

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 name.

Notably, the Complainant asserts ownership of the LEGALZOOM trademark and has adduced evidence of trademark registration in the United States, dated back to February 19, 2002, with earliest priority dating back to July 15, 2000.

The disputed domain name is confusingly similar to the Complainant’s LEGALZOOM trademark, according to the Complainant, because it merely adds the geographically descriptive term “usa” to the Complainant’s registered LEGALZOOM trademark, wholly incorporating it.

The Complainant further asserts that the Respondent lacks any rights or legitimate interests in the disputed domain name based on: the fame and well-known nature of the Complainant’s LEGALZOOM trademark, which was coined by the Complainant; the lack of any relationship with the Complainant; the lack of any license, permission, or authorization from the Complainant; the lack of any evidence that the Respondent is known by the disputed domain name; the Respondent’s use of the disputed domain name “as ‘bait’ to attract customers to Respondent’s site” as a replacement for another domain previously used by the Respondent; and “the disputed domain name is primarily descriptive of the Complainant’s services as it incorporates the Complainant’s trade and service mark.”

The Complainant argues that the Respondent has registered and used the disputed domain name in bad faith for numerous reasons, including: the Respondent’s use of the disputed domain name to divert Internet users away from the Complainant’s official website; the fame of the Complainant’s LEGALZOOM trademark, the Complainant’s rights to which far predate the creation date of the disputed domain name; and the Respondent’s prior bad faith use of the <uslegalzoom.com> domain, which has already been transferred to the Complainant. See *LegalZoom, Inc. v. Liam Smith, thetechmenders*, WIPO Case No. [D2025-0364](#) (April 29, 2025).

B. Respondent

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

6. Discussion and Findings

To succeed in its Complaint, the Complainant must establish in accordance with paragraph 4(a) of the Policy:

- i. the disputed domain name is identical or confusingly similar to a trademark 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 has been registered and is being used in bad faith.

Although the Respondent did not reply to the Complainant's contentions, the burden remains with the Complainant to establish by a balance of probabilities, or a preponderance of the evidence, all three elements of paragraph 4(a) of the Policy. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.3 ("A respondent's default would not by itself mean that the complainant is deemed to have prevailed; a respondent's default is not necessarily an admission that the complainant's claims are true. [...] [UDRP] panels have been prepared to draw certain inferences in light of the particular facts and circumstances of the case e.g., where a particular conclusion is prima facie obvious, where an explanation by the respondent is called for but is not forthcoming, or where no other plausible conclusion is apparent."); *The Vanguard Group, Inc. v. Lorna Kang*, WIPO Case No. [D2002-1064](#) ("The Respondent's default does not automatically result in a decision in favor of the complainant. The Complainant must still prove each of the three elements required by Policy paragraph 4(a)").

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.

Ownership of a nationally or regionally registered trademark serves as prima facie evidence that the Complainant has trademark rights for the purposes of standing to file this Complaint. [WIPO Overview 3.0](#), section 1.2.1. The Complainant submitted evidence that the LEGALZOOM trademark has been registered in the United States as of February 19, 2002, with earliest priority dating back to July 15, 2000, nearly twenty-five years before the disputed domain name was registered by the Respondent. Thus, the Panel finds that the Complainant's rights in the LEGALZOOM trademark have been established pursuant to the first element of the Policy.

The only remaining question under the first element of the Policy is whether the disputed domain name is identical or confusingly similar to the Complainant's LEGALZOOM trademark. In this case, the disputed domain name is confusingly similar to the Complainant's LEGALZOOM trademark because, disregarding the ".com" generic Top-Level Domain ("gTLD"), the entirety of the mark is reproduced within the disputed domain name. [WIPO Overview 3.0](#), section 1.7. ("This test typically involves a side-by-side comparison of the domain name and the textual components of the relevant trademark to assess whether the mark is recognizable within the domain name [...] [I]n cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar [...]"). gTLDs, such as ".com" in the disputed domain name, are generally viewed as a standard registration requirement and are disregarded under the first element. [WIPO Overview 3.0](#), section 1.11. The confusing similarity is not prevented by combination

with the geographically descriptive term “usa”. WIPO Overview, section 1.8 (Additional terms “whether descriptive, geographic, pejorative, meaningless, or otherwise” do not prevent a finding of confusing similarity where the relevant trademark is recognizable within the disputed domain name).

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 name. 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 name such as those enumerated in the Policy or otherwise. Where, as in this case, the Respondent fails to come forward with any relevant evidence, the Complainant is deemed to have satisfied the second element of the Policy. WIPO Overview, section 2.1.

It is evident that the Respondent, identified by registration data for the disputed domain name as “kodevchu Soft, kodevchu.soft.com” is not commonly known by the disputed domain name or the Complainant’s LEGALZOOM trademark.

Based on the undisputed facts and circumstances in the record before it, the Panel finds that the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services. This is especially the case where a disputed domain name is so obviously connected with a complainant and its products, the very use, let alone monetization attempts through offers of putative services in direct competition with a complainant, by a registrant with no connection to that complainant suggests opportunistic bad faith. The Panel concludes from the record that the Respondent had the Complainant’s LEGALZOOM trademarks in mind when registering the disputed domain name, and that the Respondent most likely registered the disputed domain name in order exploit and profit from the Complainant’s trademark rights.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy proscribes the following non-exhaustive circumstances as evidence of bad faith registration and use of the disputed domain name:

- i. Circumstances indicating that the Respondent has registered or the Respondent has acquired the disputed domain name primarily for the purpose of selling, renting, or otherwise transferring the disputed domain name registration to the Complainant who is the owner of the trademark to a competitor of that Complainant, for valuable consideration in excess of the Respondent’s documented out of pocket costs directly related to the disputed domain name; or

- ii. the Respondent has registered the disputed domain name in order to prevent the owner of the trademark from reflecting the mark in a corresponding domain name, provided that the Respondent has engaged in a pattern of such conduct; or
- iii. the Respondent has registered the disputed domain name primarily for the purpose of disrupting the business of a competitor; or
- iv. by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to the Respondent's 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 the Respondent's website or location or of a product or service on the Respondent's website or location.

Where parties are both located in the United States and the complainant has obtained a federal trademark registration pre-dating a respondent's domain name registration, panels have applied the concept of constructive notice, subject to the strength or distinctiveness of the complainant's trademark, or circumstances that corroborate the respondent's awareness of the complainant's trademark. [WIPO Overview 3.0](#), section 3.2.2. In this Panel's view, when the disputed domain name was registered on March 12, 2025, the Respondent had either constructive or actual knowledge of the Complainant's pre-existing rights in its LEGALZOOM trademark under United States law. See e.g., *Champion Broadcasting System, Inc. v. Nokta Internet Technologies*, WIPO Case No. [D2006-0128](#) (Applying the principle of constructive notice where both parties are located in the United States). Indeed, circumstances in this case corroborate the Respondent's awareness of the Complainant and the Complainant's LEGALZOOM trademark, including the Respondent's incorporation of the entire LEGALZOOM trademark in the disputed domain name; the Respondent's addition of the term "usa" to the disputed domain name, which describes the geographic location of the Complainant (and which the Panel notes is not used on the Respondent's website, but rather "us"); the arbitrary, coined or fanciful nature of the Complainant's LEGALZOOM trademark; and the Respondent's use of the disputed domain name in connection with website content that offers putative services in direct competition with the Complainant.

Moreover, the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating a descriptive term) to a famous or widely known trademark by an unaffiliated entity can by itself create a presumption of bad faith (particularly where no conceivable good faith use could be made). [WIPO Overview 3.0](#), Section 3.1.4. The Complainant has adduced evidence of recognition of the LEGALZOOM trademark and cited several WIPO panel determinations in agreement that the Complainant's LEGALZOOM trademark is considered to be "well-established", "well-known", or "famous." See e.g. *LegalZoom.com, Inc. v. Registration Private, Domains By Proxy, LLC / Byrlyne Van Dyke / Byrlyne Van Dyke-Dowers*, WIPO Case No. [D2017-2022](#) ("the term LEGALZOOM is well known in the United States and is a coined term."); *LegalZoom.com, Inc. v. Robert Sloan*, WIPO Case No. [D2019-0359](#) ("Complainant has well-established rights in its LEGALZOOM Mark based on the Complainant's numerous trademark registrations as well as the Complainant's continuous use and widespread promotion of the LEGALZOOM Mark in the United States and worldwide.") As such, the Panel finds it is unconceivable that the Respondent could have registered the disputed domain name without knowledge of the Complainant's LEGALZOOM trademark, or without any intention to benefit from confusion with the same trademark.

Use of a domain name incorporating a complainant's trademark to redirect Internet users to the respondent's website, where goods or services are offered in competition with the complainant, is strong evidence of bad faith under paragraph 4(b)(iv) of the Policy. WIPO Overview, section 3.1.4 ("Panels have moreover found the following types of evidence to support a finding that a respondent has registered a domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the complainant's mark: [...] seeking to cause confusion for respondent's commercial benefit, even if unsuccessful [...] the lack of a respondent's own rights to or legitimate interests in a domain name [or] redirecting the domain name to a different respondent-owned website [...]"). Here, the disputed domain name misappropriates the Complainant's identical LEGALZOOM trademark and resolves to the Respondent's website titled "US Legal Zoom" which sought user contact information (name, email address, phone number) and advertised identical services to the Complainant, specifically a "Free Consultation" to

“Protect Your Brand, Simplify Registration [...] Register Your Trademark for \$45. Protect Your Brand With Our Simple Process.” Accordingly, the Panel finds that use of the disputed domain name will divert potential customers from the Complainant’s business to the website under the disputed domain name by attracting Internet users who mistakenly believe that the disputed domain name is affiliated with the Complainant, and which may further mistakenly believe that the services offered on this website are authentic products offered by the Complainant, or by an entity affiliated to the Complainant.

The Panel finds the second element of the Policy has been established.

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 name <usalegalzoom.com> be transferred to the Complainant.

/Phillip V. Marano/

Phillip V. Marano

Sole Panelist

Date: August 20, 2025