

## **ADMINISTRATIVE PANEL DECISION**

LinkedIn Corporation v. Ludjon Roshi  
Case No. D2025-3024

### **1. The Parties**

The Complainant is LinkedIn Corporation, United States of America ("United States"), represented by The GigaLaw Firm, Douglas M. Isenberg, Attorney at Law, LLC, United States.

The Respondent is Ludjon Roshi, Albania.

### **2. The Domain Name and Registrar**

The disputed domain name <tangly.org> is registered with NameCheap, Inc. (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 29, 2025. On July 30, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 30, 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 (Redacted for Privacy / Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 31, 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 August 3, 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 August 4, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 24, 2025. The Respondent filed the Response on August 24, 2025.

The Center appointed Andrew D. S. Lothian as the sole panelist in this matter on August 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

Founded in 2003, the Complainant operates the world's largest professional network on the Internet, with more than 1 billion members in more than 200 countries and regions, including executives from every Fortune 500 company. The Complainant was acquired by Microsoft Corporation following an announcement on June 13, 2016, at which point the all-cash transaction was valued at USD 26.2 billion. The Complainant has a complement of 18,400 full-time employees working in 38 offices in cities around the world, and operates websites in 36 languages.

On April 30, 2024, the Complainant announced that it would offer a number of games on its website. On October 8, 2024, the Complainant announced a game called "Tango" both in a press release and on its official website. "Tango" is described by the Complainant as "a logic game from LinkedIn News where you need to fill a grid so that each row and column contains the same number of suns and moons."

The Complainant is the owner of United Kingdom Registered Trademark Number 4138481 for the word mark TANGO, filed on December 18, 2024, and registered on March 21, 2025, in Classes 9, 41, and 42.

The disputed domain name was registered on March 28, 2025. The Complainant's screenshot of the website associated with the disputed domain name, taken on July 29, 2025, shows the heading "Tango Game – Play Unlimited" below which is a game in a grid format, under which is the message, "Tango Game (Tangly) is the ultimate visual logic puzzle inspired by Tango LinkedIn News game and Binairo or Takuzu, now available in its exciting unlimited version". The Complainant produces evidence showing that two security vendors have flagged the website associated with the disputed domain name as "malicious," and "malware" respectively. The Complainant also produces evidence showing that the DNS to which the disputed domain name is delegated is configured with Mail Exchange ("MX") records, showing that the disputed domain name is capable of receiving email.

Although the Respondent filed a Response in this case, it did not provide any information about itself, such that all the Panel knows is that it appears to be a private individual with an address in Albania. The thrust of the Respondent's case is that it is the operator of the website associated with the disputed domain name, and that the game found there has a distinct identity from the Complainant's game and TANGO mark.

The Complainant shows that the Respondent is a member of the Complainant's "LinkedIn" network, and refers to its user agreement, whereby the Respondent bound itself not to "[v]iolate the intellectual property or other rights of [the Complainant]".

The Complainant shows that the Respondent was the respondent in a case brought by it under the Policy in respect of the domain name <tangogame.org>. The Panel notes that said domain name was registered on October 9, 2024.<sup>1</sup> The Complainant shows that, in such case, the Center provided the details of the Respondent's identity to the Complainant on March 27, 2025. Consequently, the disputed domain name in the present case was registered by the Respondent one day after its identity had been disclosed to the Complainant in the said case, and one week after the Complainant's TANGO trademark had been registered. The said case was settled by Notice of Settlement between the Parties received by the Center on May 2, 2025, whereby the Respondent agreed to transfer the domain name concerned to the Complainant. The said settlement agreement was expressed to be without prejudice in accordance with paragraph 17(a)(vii) of the Rules. The said case was dismissed by the Center on May 20, 2025.

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<sup>1</sup>The Panel researched the registration date of this domain name, having regard to the [WIPO Overview 3.0](#), section 4.8. This notes in part that it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision. The Panel considered putting the finding of its research to both Parties but determined that this was not necessary as they must both be presumed to know the registration date of this particular domain name.

## 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 contends that the disputed domain name is confusingly similar to its TANGO trademark. Disregarding the Top-Level Domain Name (here ".org") as is customary in the comparison, the Complainant notes that the Second-Level portion of the disputed domain name contains the dominant portion of its TANGO trademark, replacing the letter "o" with the letters "ly". The Complainant asserts that the disputed domain name constitutes an intentional misspelling of its said trademark, and thus is confusingly similar thereto, adding that the content of the website associated with the disputed domain name obviously targets such mark because it contains multiple references to TANGO and to the Complainant, and said website offers a game that is exactly the same as the Complainant's Tango game.

The Complainant submits that it has never assigned, granted, licensed, sold, transferred, or in any way authorized the Respondent to register or use its TANGO trademark in any manner, and that there is no evidence of any commercial relationship between the Parties that would entitle the Respondent to use the Complainant's mark. The Complainant adds that the fact that at least two security vendors have reported that the disputed domain name is associated with malicious activities or malware, and the fact that the disputed domain name is being used to offer identical services (i.e., an online game) to those of the Complainant, means that the Respondent has not used the disputed domain name in connection with a bona fide offering of goods or services.

The Complainant states that to its knowledge the Respondent has never been commonly known by the disputed domain name and has never acquired any trademark or service mark rights therein, adding that the Respondent is not identified as Tangly or Tango on the ICANN registration data lookup tool or elsewhere. The Complainant submits that the Respondent cannot establish rights and legitimate interests under paragraph 4(c)(iii) of the Policy because the website associated with the disputed domain name misleadingly diverts users under the doctrine of initial interest confusion, whereby confusion is not excused simply because it may be dispelled once the nature of said website is revealed, adding that the Respondent's use of the disputed domain name is not noncommercial under paragraph 4(c)(iii) of the Policy because it displays multiple advertisements.

The Complainant asserts that the Respondent's motive is to disrupt the Complainant's relationship with its customers or potential customers, or to attempt to attract Internet users for potential gain, constituting evidence of registration and use in bad faith, adding that the disputed domain name is so obviously connected with the Complainant as a result of the disputed domain name's confusing similarity to the Complainant's TANGO mark, and its use in connection with a website offering the same services as those offered by the Complainant, that the Respondent's actions suggest opportunistic bad faith in violation of the Policy.

The Complainant contends that by offering Internet users a version of the Complainant's game using the TANGO trademark, the Respondent has created a likelihood of confusion and, therefore, bad faith pursuant to paragraph 4(b)(iv) of the Policy, adding that to the extent that the Respondent is publishing without permission copies or derivative works of the Complainant's games, it has engaged in copyright infringement which is in bad faith. The Complainant notes the terms of the disclaimer at the bottom of the Respondent's web page, and asserts that this does nothing to negate, and if anything, it reinforces, the Respondent's bad faith, adding that such disclaimer can be treated as an admission by the Respondent that users may be confused. Noting the terms of the findings by two security vendors, the Complainant submits that the disputed domain name has been registered primarily to disrupt the business of a competitor, adding that illegal activity is manifestly considered to be evidence of bad faith. The Complainant notes that the presence of configured MX records in the configuration of the disputed domain name is further evidence of bad faith because it gives rise to the strong possibility that the Respondent intends to use the disputed domain name to send emails as part of a fraudulent phishing scheme.

The Complainant notes that the fact that the Respondent has acted in violation of the Complainant's User Agreement is further evidence that the Respondent has no rights or legitimate interests in the disputed domain name and has registered and used it in bad faith. The Complainant states that the Respondent is a repeat cybersquatter in terms of having registered the domain name <tangogame.org> which it transferred to the Complainant in terms of the settlement described in the factual background section above. The Complainant asserts that the Respondent has engaged in a pattern of conduct pursuant to paragraph 4(b)(ii) of the Policy by registering the domain name <tangogame.org> and the disputed domain name.

## **B. Respondent**

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Respondent argues that "tangly" is an ordinary dictionary word meaning "full of tangles" or "complicated", and is unrelated to the Complainant's brand name, adding that the overall look, sound and commercial impression of Tangly is distinct from TANGO. The Respondent asserts that there is no confusion, and that the game "tangly" is recognized by players online, including on Reddit (evidence not provided). The Respondent concludes that players understand that the Respondent's game has its own identity, and that they do not confuse it with the Complainant's TANGO mark.

The Respondent asserts that while both games are in the category of logic/puzzle games, they are different, adding that puzzle mechanics can be shared across multiple independent titles which are nevertheless recognized as separate and distinct. The Respondent says that while Tangly uses puzzle logic similar to other games, it has its own branding, name, and community recognition.

The Respondent asserts that its choice of Tangly was based upon its "descriptive, creative qualities and recognition by players," and not to target the Complainant, adding that the Respondent has not attempted to sell the disputed domain name to the Complainant or its competitors, nor has it used the disputed domain name to mislead or divert users seeking the Complainant's services.

The Respondent notes that bad faith under the Policy requires evidence of targeting the Complainant's mark, which it says is not the case here. The Respondent adds that previously the Complainant referred to a case concerning the domain name <wordlegame.com> (evidence not provided), adding that the domain name <wordly.org> continues to operate independently despite having a similar name, demonstrating that distinct names in the puzzle space can coexist without confusion, and adding that Tangly stands in the same space.

With regard to the allegation that it is a cybersquatter, the Respondent submits that the settlement in the said previous case regarding <tangogame.org> was resolved amicably and without admission of liability, arguing that this is unrelated to the instant case, and noting that each case must be judged on its own facts. The Respondent concludes that it is acting in good faith and that it is willing to make reasonable modifications to the website associated with the disputed domain name to avoid apparent overlap or confusion identified by the Panel or the Complainant.

## **6. Discussion and Findings**

### **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 Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel notes in particular that the first syllable of both the Complainant's TANGO mark and the disputed domain name is identical and pronounced identically, and that there is a pronounced hard "g" immediately following in both cases. The disputed domain name and the mark are therefore phonetically similar, and are also alphanumerically identical in their first four letters, being four out of five letters in total in the case of the mark and four out of six letters in total in the case of the Second-Level Domain of the disputed domain name. The Panel is satisfied that such letters, taken together in the same order, constitute a dominant feature of the Complainant's mark. Where, as here, at least a dominant feature of the relevant mark is recognizable in the domain name that is the subject of the comparison, such domain name will normally be considered confusingly similar to that mark for purposes of UDRP standing. [WIPO Overview 3.0](#), section 1.7.

The generic Top-Level Domain of the disputed domain name may be disregarded for the purposes of the comparison exercise, as is customary in cases under the Policy. [WIPO Overview 3.0](#), section 1.11.1.

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, based upon its submissions that it has never assigned, granted, licensed, sold, transferred or in any way authorized the Respondent to register or use its TANGO trademark, that there is no commercial relationship between the Parties, that at least two security vendors have reported that the disputed domain name is associated with malicious activities or malware, that the disputed domain name is being used to offer identical services (i.e., an online game) to those of the Complainant, that the Respondent has never been commonly known by the disputed domain name, that the disputed domain name misleadingly diverts users by way of initial interest confusion, and that the Respondent's use of the disputed domain name is not noncommercial because it displays multiple advertisements. The Panel therefore turns to the Respondent's case in rebuttal.

The essence of the Respondent's case is that it selected the name "tangly" in the disputed domain name for use with a game that it had developed in light of its dictionary meaning, namely "full of tangles" or "complicated". The Respondent maintains that this is unrelated to the Complainant's brand name, and would not be confused with it, adding that it has obtained its own independent following from the Complainant's game. Accordingly, therefore the Respondent is effectively asserting that it is making a bona fide offering of goods and services by way of the disputed domain name, and thus that it has established rights or legitimate interests conform to paragraph 4(c)(i) of the Policy.

The first problem with the Respondent's case is that the wording of paragraph 4(c)(i) of the Policy requires that it use the disputed domain name in connection with a bona fide offering of services, "before any notice to you of the dispute". That could hardly be said in the present case, where the Respondent registered the

disputed domain name the day after its identity was disclosed to the Complainant in connection with its registration of <tangogame.com>, following upon an earlier complaint under the Policy. Likewise, arguably, the Respondent was on notice of the Complainant's position regarding its intellectual property rights from the date on which it established a profile on the Complainant's LinkedIn network and registered its agreement to the Complainant's terms and conditions, albeit that the Panel is not told the precise date on which this agreement was concluded. Finally, it cannot be overlooked that the Respondent specifically referenced the Complainant's TANGO mark in the title of the home page of the website associated with the disputed domain name, namely "Tango Game", thus demonstrating that its activities were in no way independent of and unrelated to the Complainant's mark.

Furthermore, bearing in mind all of the above circumstances, it cannot realistically be argued by the Respondent that the disputed domain name is genuinely used in connection with the dictionary meaning upon which it relies, and not to trade off the Complainant's trademark rights, especially as those rights are specifically referenced by the Respondent in the title of the website associated with the disputed domain name. [WIPO Overview 3.0](#), section 2.10.1.

Panels have held that the use of a domain name for illegitimate activity, here, claimed distribution of malware, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1. It is notable that, in the Response, the Respondent does not attempt to address, deny or contradict the report produced by the Complainant regarding the disputed domain name which showed that independent security vendors had classified the related website as "malicious" and "malware" respectively. The alleged distribution of malicious content by way of the disputed domain name is a serious matter and raises a case for the Respondent to answer, which it has failed to address in this case.

The Panel notes for completeness that the Respondent's allegations that its game is a different game from that of the Complainant, albeit noting that these fall into the same category of logic/puzzle games cannot avail it. The issue for the Respondent is that it has chosen a name for its game that is apt to be confused with the Complainant's TANGO trademark, which itself is also used for a game. The Respondent's submission that its game is independently recognized within the community was not accompanied by any supporting evidence. Finally, the fact that third party games may coexist in proximity to one another is of no consequence to the present matter.

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 the Respondent registered the disputed domain name with knowledge of the Complainant and its rights. This much is evident from the past history between the Parties in connection with which the domain name <tangogame.org> registered by the Respondent was transferred to the Complainant in implementation of a settlement agreement between the Parties. The question remains whether the disputed domain name was registered with intent to target the Complainant's rights unfairly.

The Respondent's position on this topic, as previously discussed, is that it was making use of a dictionary word in the disputed domain name which could not be confused with the Complainant's TANGO mark, and which has established its own independent identity. The Panel has however found that the disputed domain name was more probably selected due to its similarity to the Complainant's TANGO mark rather than because of any dictionary meaning. This finding is affirmed by the fact that the Respondent specifically referenced the Complainant's mark on the website associated with the disputed domain name, including in the title "Tango Game". The Panel has asked itself why the Respondent would do this if it had called its game Tangly because it was convoluted or complex in the dictionary sense. The only reasonable explanation that the Panel can see is that the Respondent was seeking to profit unfairly from an association with the Complainant's TANGO mark in order to maximize the traffic to the website associated with the



disputed domain name, in turn maximizing the number of impressions in respect of the advertisements displayed there.

If there had been any doubt about whether the Respondent was intending to target the Complainant's mark, this is thoroughly dispelled by the fact that the disputed domain name was registered as soon as the Respondent's identity was disclosed to the Complainant in respect of the dispute relating to <tangogame.org>. The Respondent knew of the Complainant's rights and had already targeted these by way of the said previously registered domain name. It had the opportunity to register a domain name that would not be confused with the Complainant's TANGO mark, and indeed the opportunity to use website content that did not reference the Complainant's mark. Nevertheless, the Respondent registered the disputed domain name sharing a dominant portion of the TANGO mark in the knowledge that initial interest confusion (at least) would be created thereby. Furthermore, the Respondent exacerbated this initial interest confusion by entitling the website associated with the disputed domain name "Tango Game".

While the Respondent argues that each case must be taken on its own merits, a respondent's behavior in previous cases under the Policy can nevertheless be of relevance to subsequent cases. Notably, this is expressly anticipated by paragraph 4(b)(ii) of the Policy, which provides that circumstances indicating that a respondent has registered a domain name in order to prevent the owner of the trademark from reflecting that mark in a corresponding domain name shall be evidence of bad faith, provided that the respondent concerned has engaged in a pattern of such conduct. If previous cases were required to exist in wholly individual silos, it would preclude the examination of any such pattern.

In general, the question of registration and use in bad faith is a question of a respondent's intent, and behavior in connection with domain names in the past (particularly here where the Respondent's previously, registered domain name directly referenced the Complainant's TANGO mark in a confusing manner) can be of relevance in establishing the nature of a respondent's subsequent intent, particularly if, as here, the events referenced took place in the comparatively recent past. In other words, such events are capable of providing a window into a respondent's probable intent.

In all of the circumstances, the Panel considers that the Respondent's actions in this case could not be considered registration and use of the disputed domain name in good faith, notably because, by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of such website, conform to paragraph 4(b)(iv) of the Policy.

Turning briefly to the Complainant's allegations that the website associated with the disputed domain name has been used to distribute malware or otherwise consists of malicious content, Panels have held that the use of a domain name for illegitimate activity, as here claimed in an uncontradicted submission accompanied by suitable evidence, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. It is notable that the Respondent did not address the Complainant's submissions on this topic, particularly as they were accompanied by independent evidence of the findings of security vendors. In the circumstances of this case, this is also suggestive of registration and use in bad faith.

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 name <tangly.org> be transferred to the Complainant.

*/Andrew D. S. Lothian/*

**Andrew D. S. Lothian**

Sole Panelist

Date: September9, 2025