

ADMINISTRATIVE PANEL DECISION

LPL Financial LLC v. Real Ade

Case No. D2025-3079

1. The Parties

Complainant is LPL Financial LLC, United States of America ("United States"), represented by Hogan Lovells (Paris) LLP, France.

Respondent is Real Ade, United States.

2. The Domain Names and Registrar

The disputed domain names <clientsworkspl.com>, <lpladvisorclient.com>, <lpladvisorsapp.com>, and <lplfinanceapp.com> are registered with Web Commerce Communications Limited dba WebNic.cc ("the Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 1, 2025. On August 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On August 4, 2025, the Registrar transmitted by email to the Center its verification response confirming that Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to Complainant on August 7, 2025, providing the registrant and contact information disclosed by the Registrar.

The Center verified that 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 Respondent of the Complaint, and the proceedings commenced on August 8, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 28, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on September 2, 2025.

The Center appointed Bradley A. Slutsky as the sole panelist in this matter on September 10, 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

Complainant is a limited liability company headquartered in San Diego, California, United States, and established in 1989. Complainant is in the “retail financial advice market”, providing over 28,000 investment advisors with technology, research, clearing and compliance services, and practice management programs to create and grow their practices. Collectively, these practices manage over USD 1.7 trillion in advisory and brokerage assets. Complainant has over 7,700 employees. Since 2010, Complainant’s stock has been publicly traded on the NASDAQ stock market. As of the first quarter of 2025, Complainant reported gross profits in excess of USD 1.27 billion and net income of USD 319 million.

Among Complainant’s technological offerings is the ClientWorks platform, an online interface launched in 2014 that enables financial advisors to manage client relationships and business operations.

Complainant has several LPL and CLIENTWORKS trademark registrations, including the following:

Trademark	Goods / Services	Jurisdiction	Registration No.	Registration Date
LPL	Financial management services	United States	1,801,076	October 26, 1993
LPL	Financial advice and management services, etc.	United Kingdom	UK00003753607	May 13, 2022
LPL	Financial, monetary and banking services, etc.	European Union	018653022	May 26, 2022
LPL FINANCIAL with logo	Financial advice and financial management services, etc.	United States	3,662,425	August 4, 2009
LPL FINANCIAL	Financial advice and financial management services, etc.	United Kingdom	UK00003753611	May 13, 2022
CLIENTWORKS	Portal for information in the fields of financial and investment services, etc.	United States	5,097,438	December 6, 2016

Complainant operates several domain names incorporating its marks, including <lpl.com>, <lpl.net>, <lpl-financial.com>, <lplfinancial.com>, and <lplaccountview.com>. It also owns the generic Top-Level Domains (gTLDs) “.lpl” and “.lplfinancial” through its parent company. Complainant also maintains an active presence on social media platforms such as Facebook, X, LinkedIn, and YouTube. Since 2014, Complainant also has operated an “online platform and interface for its financial advisors called ClientWorks.”

The disputed domain names were all registered on April 24, 2025, through the Registrar. The disputed domain names are either inactive or resolve to error pages.

On July 17, 2025, Complainant’s counsel sent a cease-and-desist letter to Respondent regarding the disputed domain names. No response was received.

5. Parties’ Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain names.

Complainant contends that the disputed domain names are confusingly similar to Complainant's registered trademarks LPL, LPL FINANCIAL, and CLIENTWORKS. Complainant argues that each of the disputed domain names incorporate Complainant's marks in their entirety, with the addition of generic or descriptive additions such as the letter "s" or the words "client", "advisor", "advisors", "app," and "finance".

Complainant further asserts that Respondent lacks rights or legitimate interests in the disputed domain names, as Respondent has not been authorized to use Complainant's marks, and has not made any use of the disputed domain names in connection with a bona fide offering of goods or services. The disputed domain names are either inactive or resolve to error pages, and there is no evidence of preparations to offer goods or services. Complainant also notes that "[t]he publicly-available Whois records for the Domain Names show that the Domain Names were registered in the name of 'Real Ade' ... which does not bear any resemblance to the Domain Names whatsoever", and that the "non-use of the Domain Names in connection with active websites ... does not support any reasonable claim of being commonly known by the Domain Names, nor does it give rise to any reputation in the Domain Names themselves". According to Complainant, "the street address listed on the Whois records for the Domain Names ... appears to be false or incomplete" and "the non-use of a domain name in connection with an active website does not amount to legitimate noncommercial or fair use of the domain name." Per Complainant, the incorporation of Complainant's trademarks within the disputed domain names also does not support a claim of fair use.

Complainant further argues that the disputed domain names were registered and are being used in bad faith. Complainant contends that its marks are distinctive and that "Respondent could not credibly argue that it did not have knowledge of the Complainant and its trademark rights when registering the Domain Names in 2025, over 30 years after the Complainant's first registration of its LPL trademark". Complainant also asserts that Respondent's use of false or incomplete contact information is indicative of bad faith, as is Respondent's failure to respond to Complainant's cease and desist letter. Finally, Complainant asserts that the factors outlined in *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#) also support a finding of bad faith.

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

Pursuant to paragraph 15(a) of the Rules, a panel in UDRP proceedings "shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable".

Under paragraph 4(a) of the Policy, Complainant must prove the following:

- (i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which Complainant has rights;
- (ii) 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 Complainant's trademark and the disputed domain names. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.

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

The Panel finds that Complainant's marks are recognizable within the disputed domain names. The entirety of Complainant's LPL and CLIENTWORKS marks are reproduced within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to Complainant's marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. "[T]he addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element." [WIPO Overview 3.0](#), section 1.8. Further, the applicable gTLD in a domain name is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1. Accordingly, the disputed domain names are confusingly similar to Complainant's marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Thus, 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 Respondent may demonstrate rights or legitimate interests in a disputed domain name:

"Any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate [Respondent's] rights or legitimate interests to the domain name[s] for purposes of paragraph 4(a)(ii):

(i) before any notice to [Respondent] of the dispute, [Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name[s] or ... name[s] corresponding to the [disputed] domain name[s] in connection with a bona fide offering of goods or services; or

(ii) [Respondent] (as an individual, business, or other organization) [has] been commonly known by the [disputed] domain name[s], even if [Respondent has] acquired no trademark or service mark rights; or

(iii) [Respondent is] making a legitimate noncommercial or fair use of the [disputed] domain name[s], without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue".

Although the overall burden of proof in UDRP proceedings is on 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 Respondent. As such, where a complainant makes out a prima facie case that a 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 Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain names. Respondent has not rebutted 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 evidence of record indicates that the disputed domain names have been registered but have not been used other than for passive holding. The available evidence thus does not demonstrate any use of, or demonstrable preparations to use, the disputed domain names in connection with a bona fide offering of

goods or services, or for a legitimate noncommercial or fair use, or that would cause Respondent to be commonly known by the disputed domain names. Further, Complainant asserts that “Respondent has not received any license or other authorization of any kind to make use of the Complainant’s trademarks, in a domain name or otherwise”, and that neither the Whois records for the disputed domain names nor the use of the disputed domain names support a claim that Respondent has been commonly known by the disputed domain names. Respondent has not rebutted these allegations. See *Sealy Technology LLC v. Domain Administrator, Fundacion Privacy Services LTD*, WIPO Case No. [D2025-2623](#) (“The Panel finally notes that the non-use of the disputed domain name does not establish any rights or legitimate interests on the part of the Respondent. In the absence of any credible evidence of preparation for a bona fide offering of goods or services, the Respondent cannot be considered to have rights or legitimate interests under the Policy.”).

Lastly, the Panel also finds that the nature of the disputed domain names (including the Complainant’s trademarks in their entirety with additional terms related to Complainant’s activity) cannot constitute fair use since they effectively impersonate or suggest sponsorship or endorsement by Complainant. WIPO Overview 2.5.1.

Accordingly, 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 domain names in bad faith. Specifically, “the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of ... domain name[s] in bad faith:

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

(ii) [Respondent has] registered the domain name[s] in order to prevent the owner of the trademark or service mark from reflecting the mark in ... corresponding domain name[s], provided that [Respondent has] engaged in a pattern of such conduct; or

(iii) [Respondent has] registered the domain name[s] primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name[s], [Respondent has] intentionally attempted to attract, for commercial gain, Internet users to [Respondent’s] website[s] or other online location[s], by creating a likelihood of confusion with Complainant’s mark as to the source, sponsorship, affiliation, or endorsement of [Respondent’s] website[s] or location[s] or of a product or service on [Respondent’s] website[s] or location[s].”

“Given that the scenarios described in UDRP paragraph 4(b) are non-exclusive and merely illustrative, even where a complainant may not be able to demonstrate the literal or verbatim application of one of the above scenarios, evidence demonstrating that a respondent seeks to take unfair advantage of, abuse, or otherwise engage in behavior detrimental to Complainant’s trademark would also satisfy complainant’s burden.” [WIPO Overview 3.0](#), section 3.1.

In the present case, the Panel notes that Respondent registered four domain names using Complainant’s trademarks – all on the same day. Respondent is not licensed or otherwise authorized to use Complainant’s trademarks. It is unlikely that Respondent registered the disputed domain names without intending for there to be an association with Complainant. This is especially true given that the generic terms used with Complainant’s trademarks relate to Complainant’s business or operations. Respondent has not made any

legitimate or bona fide use of the disputed domain names, and Respondent registered the disputed domain names using an address that appears to be false or incomplete. Respondent further failed to respond to Complainant's cease and desist letter or otherwise offer any explanation for the actions noted above. These facts are indicative of bad faith. See *Instagram, LLC v. Niyaz Khan, Ergonomic solutions*, WIPO Case No. [D2024-3290](#) ("other relevant factors corroborate the finding of the Respondent's bad faith conduct in this case ... [including] the lack of reply to the cease and desist letter sent prior to this proceeding."); *Gilead Sciences, Inc. v. Xing Wang*, WIPO Case No. [D2021-3342](#) ("Given the fact that Respondent has registered four domain names that are very similar to Complainant's Mark, this implies bad faith."); *LPL Financial LLC v. 钱梦聘 (Qianmengdan)*, WIPO Case No. [D2021-0150](#) ("It is not conceivable that Respondent would not have had actual notice of the LPL and LPL FINANCIAL marks at the time of the registration of the disputed domain name (in September 2020). The Panel therefore finds that the LPL and LPL FINANCIAL mark is not one that a trader could legitimately adopt other than for the purpose of creating an impression of an association with Complainant Moreover, Respondent has chosen not to respond to Complainant's allegations. ... Thus, the Panel concludes that the disputed domain name was registered in bad faith."); [WIPO Overview 3.0](#), section 3.6 ("Panels additionally view the provision of false contact information [or an additional privacy or proxy service]) underlying a privacy or proxy service as an indication of bad faith.").

Further, Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of Complainant's trademarks, the fact that the disputed domain names incorporate Complainant's trademarks with terms related to Complainant's business, the failure of Respondent to submit a response or to provide any evidence of actual or contemplated good faith use, Respondent's use of false contact details, and the implausibility of any good faith use to which the disputed domain names may be put, and thus 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. See *Telstra Corporation Limited v. Nuclear Marshmallows*, supra.

Accordingly, the Panel finds that 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, <clientsworkspl.com>, <lpladvisorclient.com>, <lpladvisorsapp.com>, and <lplfinanceapp.com>, be transferred to Complainant.

/Bradley A. Slutsky/

Bradley A. Slutsky

Sole Panelist

Date: September 24, 2025