

## **ADMINISTRATIVE PANEL DECISION**

LEGO Holding A/S v. Dias Jarmahanov  
Case No. D2025-3498

### **1. The Parties**

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

The Respondent is Dias Jarmahanov, Kazakhstan.

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

The disputed domain name <legoland-tickets.org> is registered with Spaceship, Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 28, 2025. On August 29, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 1, 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 Purposes, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 1, 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 amended Complaint on September 3, 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 Respondent of the Complaint, and the proceedings commenced on September 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 30, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 1, 2025.

The Center appointed Fabrizio Bedarida as the sole panelist in this matter on October 3, 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.

The Complainant has a huge number of registrations for the LEGO and LEGOLAND trademarks around the world. Indeed, the Complainant has provided a full list of the LEGO and LEGOLAND trademarks registered in jurisdictions around the world.

The Complainant is, inter alia, the owner of the following:

United Kingdom trademark registration number UK00900107466 for the LEGO LEGOLAND (device) trademark, registered on January 5, 1999;

United Kingdom trademark registration number UK00000754628 for LEGO (word) trademark, registered on June 11, 1956;

European Union trademark registration number 000054205 for the LEGOLAND (word) trademark, registered on October 5, 1998.

In addition, the Complainant is the owner of more than 6,000 domain names containing the trademark LEGO and over 400 containing the trademark LEGOLAND.

The Complainant also maintains extensive websites under the domain names <lego.com> (registered on August 22, 1995) and <legoland.com> (registered on August 4, 1998).

The disputed domain name was registered on May 16, 2025.

The disputed domain name resolves to a website that provides third-party booking services for Legoland theme parks. On this website the Complainant's LEGO and LEGOLAND trademarks as well as images and information regarding Legoland theme parks are displayed alongside "buy tickets" and "book now" click buttons redirecting to the third party website. At the bottom of the last page of the Respondent's website a disclaimer is displayed, informing the users that the website is an independent ticket sales platform which is not affiliated with, sponsored by, or endorsed by the LEGO Group or LEGOLAND parks.

The Complainant's representatives sent cease and desist letters to the disputed domain name registrant, 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 name.

Notably, the Complainant contends that the disputed domain name is confusingly similar to the LEGO and LEGOLAND trademarks, that the Respondent has no rights or legitimate interests in respect of the disputed domain name, and particularly that it is implausible that the Respondent was unaware of the Complainant's renowned trademarks when it registered the disputed domain name, and did so with the intention of taking advantage of the fame and goodwill that the Complainant has built up in its brand. The Complainant further asserts that the Respondent's use of a disclaimer on its website is insufficient to avoid a finding of bad faith, and it must be held that the Respondent has intentionally misappropriated the Complainant's trademark as a way of redirecting internet users searching for the Complainant to the Respondent's website, only to then offer a disclaimer and content unrelated to, and not approved by, the Complainant. This sort of tactic is labeled "bait-and-switch" for its propensity to confuse internet users into believing that they are visiting a complainant's site only to discover that the disputed domain is completely unconnected to that complainant. The Complainant affirms that this tactic has been held to be evidence of bad faith registration and use by past panels. In support of this the Complainant refers to WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 3.7 ("Where the overall circumstances of a case point to the respondent's bad faith, the mere existence of a disclaimer cannot cure such bad faith. In such cases, panels may consider the respondent's use of a disclaimer as an admission by the respondent that users may be confused.")

### **B. Respondent**

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

## **6. Discussion and Findings**

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

- (i) the disputed domain name is 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 name; and
- (iii) the disputed domain name has been registered and is 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 entirety of the marks LEGO and LEGOLAND are reproduced and recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms, here “tickets”, may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name 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 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.

The Panel considers that the composition of the disputed domain name, consisting of the entirety of the Complainant’s LEGOLAND trademark and the term “tickets”, resolving to a website promoting tickets for Legoland theme parks, carries a risk of implied affiliation with the Complainant.

Furthermore, as previously affirmed by past panels, the respondent’s use of the complainant’s mark to redirect users (e.g., to a competing site) would not support a claim to rights or legitimate interests upon a respondent. See [WIPO Overview 3.0](#), section 2.5.3

Panels have held that the use of a domain name for illegitimate activity, here, claimed impersonation/passing off, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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 was aware of the Complainant’s trademark registrations and rights to the LEGO and LEGOLAND trademarks when it registered the disputed domain name.

The Complainant’s trademarks are famous. Indeed, the LEGO trademark is recognized as one of the world’s most renowned trademarks. The disputed domain name contains in its entirety, without any authorization or approval, the Complainant’s registered LEGO and LEGOLAND trademarks, and this is the only distinctive component of the disputed domain name.

The disputed domain name was registered many decades after the Complainant's renowned trademarks were 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 name.

Moreover, noting the use of the disputed domain name, it is apparent that the Respondent, when registering the disputed domain name, had knowledge of the Complainant's earlier rights to the LEGO and LEGOLAND trademarks 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.

Inference of bad faith registration and use of the disputed domain name is further supported by the facts that: the Respondent used a privacy Whois service for the registration of the disputed domain name; the Respondent did not respond to the Complainant's cease and desist letters, nor to the Complaint in the present proceeding; and, the Respondent is using the disputed domain name for a website displaying the Complainant's trademarks and logo, as well as images of the Legoland theme parks, alongside "buy tickets" and/or "book now" click buttons redirecting to a third party website, where tickets for the Legoland theme parks and for other, unrelated parks/attractions are sold.

The presence of the disclaimer at the bottom of the Respondent's website is, in the view of this Panel, insufficient to avoid confusion and to exclude a bad faith use of the disputed domain name. In the present case the disclaimer is not particularly prominent, and a visitor has to scroll down through several pages to find it. By contrast, the "buy tickets" buttons (redirecting to a different website) are immediately visible. It is therefore probable that many users will not even see the disclaimer and will most likely believe that they are on a website operated by or affiliated with the Complainant.

This Panel thus agrees with the Complainant and with past panels' findings, and considers that the overall circumstances of this case point to the Respondent's bad faith, and that the mere existence of the disclaimer cannot cure such 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 <legoland-tickets.org> be transferred to the Complainant.

*/Fabrizio Bedarida/*

**Fabrizio Bedarida**

Sole Panelist

Date: October 14, 2025