

## **ADMINISTRATIVE PANEL DECISION**

L&E Group Inc. v. Andreas Andreou  
Case No. D2025-3980

### **1. The Parties**

The Complainant is L&E Group Inc., Japan, represented by IP Twins, France.

The Respondent is Andreas Andreou, Cyprus.

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

The disputed domain name <link-a.net> is registered with Internet Domain Service BS Corp (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 30, 2025. On September 30, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 2, 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 Corp.) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 2, 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 October 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 October 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 26, 2025. The Respondent did not submit any response by that date. Accordingly, the Center notified the Respondent’s default on October 27, 2025. The Respondent filed a late response on October 28, 2025.

The Center appointed Steven A. Maier as the sole panelist in this matter on October 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.

The Panel issued Procedural Order No. 1 on November 18, 2025, requesting the Parties to make further submissions, which will be described in detail below. The Respondent filed its reply on November 22, 2025, while the Complainant filed its reply on November 26, 2025.

#### **4. Factual Background**

The Complainant is a company registered in Japan, offering advertising and digital marketing services.

The Complainant appears to have been the owner of the disputed domain name from approximately 2012 until a date in early 2025. The Complainant used the disputed domain name for the purpose of a website at “www.link-a.net”, which promoted an affiliate service program named LINK-A until the cessation of that service in March 2023, when it rebranded the program as LINK-AG.

The Complainant is the owner of Japan trademark registration number 6597551 for the word mark LINK-AG, registered on August 5, 2022 in International Classes 35, 41, and 42.

The Respondent is a domain name investor. He appears to have acquired the disputed domain name from a reseller, either by way of direct purchase or at auction. The Respondent provides evidence that he registered the disputed domain name on March 25, 2025, which registration date has also been independently confirmed by the Registrar.

As of September 26, 2025 the disputed domain name resolved to a website at “www.link-a.net”, headed “Link a” and featuring a dice logo. The website offered a ranking of online casino websites and appeared to include links to the featured websites. As of the date of this Decision, the website merely says “website coming soon”.

#### **5. Parties’ Contentions**

##### **A. Complainant**

The Complainant states it allowed its own registration of the disputed domain name to lapse in early 2025 owing to an administrative error.

The Complainant claims common law or unregistered trademark rights in the mark LINK-A. It contends that it continuously used the mark LINK-A in connection with its affiliate service program from 2011 until March 2023 and had up to 50,000 users.

The Complainant exhibits a number of media articles which it claims to reflect the reputation of its LINK-A trademark, particularly in Asia. The Panel notes that several of these appear to be announcements by the Complainant itself, and to refer to future plans as opposed to any established business under the mark. However, an article in “Dream News” dated March 9, 2018 refers to the LINK-A program having achieved an annual growth rate of 300% since inception, and an article in “Mayonez” (undated) refers to LINK-A having over 30,000 subscribers.

The Complainant submits that, as a result of its business activities under the LINK-A mark, the mark has developed a secondary and distinctive meaning within the digital marketing community as designating the Complainant and its services.

The Complainant contends that the disputed domain name is identical to its unregistered trademark LINK-A, and confusingly similar to its registered trademark LINK-AG, differing from that trademark only by the absence of the letter “g” in the disputed domain name.

The Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It states that it has no relationship with the Respondent and has never authorized him to use its LINK-A trademark, that the Respondent has not commonly been known by the disputed domain name, and that the Respondent is not making any bona fide commercial use of the disputed domain name. The Complainant asserts, in particular, that the use of the disputed domain name to offer (what it calls) auto-generated content relating to online gambling does not amount to bona fide commercial use.

The Complainant submits that the disputed domain name was registered and is being used in bad faith.

The Complainant contends that the Respondent acquired the disputed domain name at auction, knowing that it had been previously registered. It asserts that the Respondent must have had the Complainant's name and trademark in mind when he registered the disputed domain name, since his choice of the name cannot have been accidental and must have been influenced by the Complainant's earlier use of the LINK-A trademark.

The Complainant further submits that registrants who purchase domain names in a drop-catch scenario may be said to be on notice of the previous owner's trademark rights in the domain name (*Tata Sons Private Ltd. and Tata Teleservice Limited v. Private Registration, NameBrightPrivacy.com / PebbleBridge Tech, PebbleBridge Technologies*, WIPO Case No. [D2022-1038](#)). It adds that a simple trademark search carried out by the Respondent at the time of acquisition of the disputed domain name would have revealed the existence of the Complainant and its trademarks.

The Complainant contends that the Respondent's use of the disputed domain name for a website relating to online gambling cannot be considered good faith use of the disputed domain name, and implies instead an intention to obtain financial gain by benefiting from the renown and Internet traffic previously generated by the Complainant's use of the disputed domain name.

The Complainant further submits that the disputed domain name had previously been used by the respondent to resolve to a website highly resembling the official website of the Complainant, and reproducing its name and trademark, but without any element to disclaim a relationship between the website operator and the Complainant. It exhibits a screenshot dated June 14, 2025 in support of this contention.

The Complainant requests the transfer of the disputed domain name.

## **B. Respondent**

The Respondent states that he purchased the disputed domain name in good faith, from a domain name reseller, without any knowledge of the Complainant or its business.

The Respondent contends that any enforceable rights on the part of the Complainant are restricted to its registered trademark, LINK-AG, and that it cannot claim exclusive rights in the term "link-a", which is generic and descriptive in nature.

The Respondent further submits that, even if the Complainant had trademark rights in the mark LINK-A, such rights would be restricted to the specific goods or services for which registered, and that its use by the respondent in a completely unrelated industry does not risk consumer confusion.

The Respondent contends that he has a legitimate interest in owning a generic and descriptive domain name such as the disputed domain name, and that he has never used the disputed domain name in any manner that could cause confusion with the Complainant's services.

## **6. Procedural Order and Supplemental Filings**

On November 18, 2025, the Panel issued Procedural Order No. 1. The Procedural Order noted the Complainant's contention that the disputed domain name had displayed content similar to the Complainant's own website content, and that according to archived records at "www.archive.com", that content had remained linked to the disputed domain name until September 8, 2025. The Respondent was directed to provide evidence of the date on which he registered the disputed domain name and, subject to that date, to explain why the disputed domain name had continued to resolve to the Complainant's content. The Complainant was invited to reply to the Respondent's further submission (its reply being limited to the matters addressed that submission).

The Respondent filed its reply on November 22, 2024. He confirmed his date of registration of the disputed domain name as March 25, 2025. He stated that it was factually inaccurate to say that the Complainant's content had continued to appear on the website linked to the disputed domain name until September 8, 2025, and that no such content was present in September 2025. He submitted that "[a]ny residual content that may have appeared temporarily may have been because of the fact that the nameservers had not yet been updated after transferring the domain from the previous owner."

The Complainant replied to the Respondent's submission on November 26, 2025, exhibiting screenshots dated May 28, June 14, July 25, and August 11, 2025, which it submitted comprised content similar to its own previous website content. The Complainant challenged the Respondent's characterization of the content as "residual" in circumstances where it appeared on an active website for several months after the Respondent had acquired the disputed domain name, asserting that this would cause damage to the Complainant's corporate image.

The Complainant further submitted that the Respondent's original Response, having been filed out of time, should be disallowed, as there was no exceptional reason to permit a late filing in the proceeding.

The Complainant made additional submissions which could, in the view of the Panel, have been included in the original Complaint. The Panel elects to disregard those submissions for that reason.

## **7. Discussion and Findings**

### **A. Procedural Matter**

As stated above, the Response in this matter was filed on October 28, 2025, two days out of time. The Respondent apologized to the Center for this delay and stated that he had been traveling and had only recently become aware of the proceeding.

In accordance with its general powers to regulate the proceeding under rule 10 of the Rules, and while noting the Complainant's objection, the Panel determines in its discretion to admit the late-filed Response in the present case, on the basis that no material prejudice will be suffered by the Complainant by virtue of the late filing.

### **B. Substantive Issues**

In order to succeed in the Complaint, the Complainant is required to show that all three of the elements set out under paragraph 4(a) of the Policy are present. Those elements are that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark 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.

## **A. Identical or Confusingly Similar**

The Complainant has established that it is the owner of registered trademark rights in the mark LINK-AG. It also claims unregistered or common law trademark rights in the mark LINK-A.

As observed in section 1.3 of WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ([“WIPO Overview 3.0”](#)): :

“To establish unregistered or common law trademark rights for purposes of the UDRP, the complainant must show that its mark has become a distinctive identifier which consumers associate with the complainant’s goods and/or services.

Relevant evidence demonstrating such acquired distinctiveness (also referred to as secondary meaning) includes a range of factors such as (i) the duration and nature of use of the mark, (ii) the amount of sales under the mark, (iii) the nature and extent of advertising using the mark, (iv) the degree of actual public (e.g., consumer, industry, media) recognition, and (v) consumer surveys.”

Noting the Complainant’s use of the LINK-A mark for its affiliate program over a period of approximately 11 years, and its evidence of at least 30,000 subscribers, the Panel is prepared to accept that the Complainant has established some level of unregistered trademark rights in the mark LINK-A for the purposes of the Policy. The Panel notes, however, that it does not find the LINK-A mark to be particularly distinctive in nature, or to have gained a significant degree of public recognition outside of the digital marketing community in Asia: indeed, the Panel’s Google search against the term “link-a” did not appear to produce any results relating to the Complainant or that trademark. <sup>1</sup>

The disputed domain name is identical to the LINK-A trademark and also, in the view of the Panel, confusingly similar to the Complainant’s LINK-AG trademark, from which it differs only by the omission of the letter “g” in the disputed domain name.

The Panel therefore finds that the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights.

## **B. Rights or Legitimate Interests**

The Respondent appears to have used the disputed domain name for the purpose of a website offering a ranking of online casino services and links to a number of the websites in question. However, he provides no explanation of his choice of the disputed domain name for this purpose, nor of how the disputed domain name or the term “link-a” could be said to relate to the services offered under it. While a registrant may have rights or legitimate interests in a domain name, in general, where a credible rationale for its acquisition is advanced and is supported by evidence, and in particular for one comprising a dictionary word or phrase which is used in connection with the meaning of that term, the Panel does not find those circumstances to be present in this case.

The Panel therefore finds that the Complainant has met its burden under the second element.

## **C. Registered and Used in Bad Faith**

It appears to the Panel, on the basis of the available evidence, that the disputed domain name resolved to content which referred to the Complainant, and/or comprised or mirrored the Complainant’s own previous website content, until at least August 11, 2025. <sup>2</sup> While this is consistent with the Respondent’s submission that no such content appeared as late as September 2025, it still leaves a period of over four months during which the disputed domain name, under the Respondent’s control, resolved to the material in question.

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<sup>1</sup>As discussed in section 4.8 of [WIPO Overview 3.0](#), 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.

<sup>2</sup>While “www.archive.org” includes a tawl result labelled September 8, 2025, the related image appears to be a screenshot dated August 11, 2025.

The Panel is unable to determine on the basis of the available evidence whether, as the Respondent submits, that material was the Complainant's own, residual, material which the Respondent had not yet removed or, alternatively, content deliberately placed there by the Respondent. However, for the reasons which are discussed below, the Panel does not find that distinction to be of importance in arriving at its decision.

The issues surrounding domain names which have been acquired in a drop-catching scenario have received attention in previous decisions under the UDRP.

As summarized in section 3.2.3 of [WIPO Overview 3.0](#):

"Panels have held that especially domainers undertaking bulk purchases or automated registrations have an affirmative obligation to avoid the registration of trademark-abusive domain names. Panelists will look to the facts of the case to determine whether such respondent has undertaken good faith efforts to screen such registrations against readily-available online databases to avoid the registration of trademark-abusive domain names."

The application of such an affirmative obligation in a drop-catching scenario (whether or not a bulk or automated purchase was involved) was considered in *Supermac's (Holdings) Limited v. Domain Administrator, DomainMarket.com*, WIPO Case No. [D2018-0540](#), where the panel stated:

"The Panel emphasizes that critical to its reasoning and its conclusion in this case is that the Respondent acquired the disputed domain name through drop-catching. Registration of a domain name in that circumstance is not the same as "ordinary" registration of a domain name (i.e., registration of a domain name which is not held by another person immediately prior to registration). Where registration occurs through drop-catching, the registrant is objectively aware that another person held the registration immediately prior. This, in effect, puts the registrant on notice that another person (the immediately prior registrant) may have rights in a trademark to which the domain name is identical or confusingly similar."

Moreover, prior panels under the UDRP have also determined that, not only the prior registrant's trademark rights, but also the prior registrant's website content, may be relevant to the third element under the Policy. For example, in *Town of Secaucus, New Jersey v. Martina Zammit, Oring Ltd.*, WIPO Case No. [D2020-0509](#), the drop-catch purchaser of the disputed domain name used it to display the complainant's own (although outdated) website content for approximately one month, between the date of its acquisition of the disputed domain name until the date the complaint in the proceeding was filed. The panel observed that:

"... the amount paid to the Registrar by the Respondent reflects the value the Respondent placed on the disputed domain name in the context of a "drop catching" scenario. As indicated above, that value appears to have been influenced by the significance of the disputed domain name as a domain name used by the Complainant (corroborated by the Respondent posting material taken from the Complainant's website)."

The point must also be borne in mind that, in the case of a drop-catch purchase of a domain name having no obvious cachet (e.g. a well-known trademark or descriptive term in common usage), the value for a domain name investor will frequently include such factors as the longevity of the domain name, the number of back links it has acquired and its historical traffic, which factors impact directly upon search engine responses, and therefore the ability to monetize the domain name in question. The existing commercial goodwill of that nature has, of course, been generated by the efforts of the previous owner(s) of the domain name.

In order to succeed in the Complainant, it is necessary for the Complainant to establish the conjunctive requirement that the disputed domain name was both registered in bad faith and had been used in bad faith, i.e., with knowledge of the Complainant's rights and the intention to take unfair advantage of those rights, or to cause an unfair detriment to the Complainant. Here, the Respondent submits that he merely omitted for a period of time to remove the Complainant's prior website content before replacing it with his own, by which he implies that the disputed domain name was not acquired or used by him with any bad-faith intent.

The Panel does not agree. Even if it is correct in this case that the Respondent did not deliberately replicate the Complainant's website content, but simply left it undisturbed without verifying or modifying the connection to previous nameservers, that would in the view of the Panel signal a reckless disregard of the Complainant's rights, both at the time registration of the disputed domain name and subsequently. The Complainant having lost control of the disputed domain name, the fact that it continued to resolve to the Complainant's content, over which the Complainant had no continuing agency or control, both misrepresents to the public the ownership or control of the relevant website and risks causing reputational damage to the Complainant. Those matters amount to causing an unfair detriment to the Complainant. Moreover, the Panel draws a substantial inference in all the circumstances of the case that the Respondent hoped to take advantage of the accumulated online goodwill attaching disputed domain name, which for the reasons explained above, would have been attributable mainly to the prior efforts of the Complainant.

The Panel observes that the drop-catching of domain names is not illegitimate per se, and each case must be examined on its individual merits and bearing a number of factors in mind. In this case, given the somewhat descriptive nature of the Complainant's trademark and the limited evidence of its reputation, the Respondent may have had a better case to present if he had used the disputed domain name from the outset for the purpose of the casino review site and without any connection to the previous owner. In the light, however, of the disputed domain name having continued to display website content relating to the Complainant for a period of over four months following the Respondent's acquisition of the disputed domain name, whether by design or by the culpable omission of the Respondent, the Panel finds that the disputed domain name was both registered and has been used in bad faith.

## **8. 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 <link-a.net> be transferred to the Complainant.

*/Steven A. Maier/*

**Steven A. Maier**

Sole Panelist

Date: November 28, 2025