

ADMINISTRATIVE PANEL DECISION

Pre-Paid Legal Services, Inc. v. one world one goal
Case No. D2025-4920

1. The Parties

The Complainant is Pre-Paid Legal Services, Inc., United States of America (“United States”), represented by Crowe & Dunlevy, P.C., United States.

The Respondent is one world one goal, India, self-represented.

2. The Domain Name and Registrar

The disputed domain name <legalshieldleads.com> is registered with GMO Internet, Inc. d/b/a Discount- Domain.com and Onamae.com (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 26, 2025. On November 27, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 28, 2025, the Registrar transmitted by email to the Center its verification response, confirming that the Respondent is listed as the registrant and its contact details.

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 the Respondent of the Complaint, and the proceedings commenced on December 8, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 28, 2025. The Response was filed with the Center on December 11, 2025.

The Center appointed Jeremy Speres as the sole panelist in this matter on January 9, 2026. 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 has been selling legal expense plans to consumers in North America under the LEGALSHIELD mark since 1999, currently servicing 4.5 million individuals and 140,000 businesses.

The Complainant's mark is registered as, amongst others, United States Trademark Registration No. 4354563 LEGALSHIELD in class 36, having a registration date of June 18, 2013, and a use in commerce date of December 31, 1999. The Complainant's primary website is hosted at its domain name <legalshield.com> which was registered in 2001.

The disputed domain name was registered on June 9, 2025, and resolves to a website entitled "LegalShieldLeads.com – Leads for Associates" purportedly offering customer leads for the Complainant's services for sale to associates of the Complainant.

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 was registered and has been used in bad faith in order to benefit the Respondent commercially by implying that the disputed domain name's website is associated with or endorsed by the Complainant.

B. Respondent

The Respondent filed a Response from an email address associated with the disputed domain name. The Respondent contends that the Complainant has not satisfied the second and third elements required under the Policy for a transfer of the disputed domain name.

Notably, the Respondent contends that it has legitimate interests in the disputed domain name as it is making nominative fair use of it, as the Complainant's mark is used referentially to describe the Respondent's target audience. The Respondent further contends that the disputed domain name was not registered or used in bad faith as: the Respondent's intention was to help the Complainant's ecosystem by supplying its associates with high quality leads; the Respondent never used the Complainant's logo; the services offered are ancillary to the Complainant's services; and the Respondent is willing to correct any unintentional confusion.

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 entirety of the mark is reproduced 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.

Although the addition of other terms, here “leads”, 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 Panel accepts that the Complainant’s mark was registered and well known in its sector prior to registration of the disputed domain name, the disputed domain name is confusingly similar to the Complainant’s mark, and the Respondent has used the disputed domain name for offering a service relating directly to the Complainant without the Complainant’s authorization.

Here, the Respondent claims to be making a *bona fide* offering of services under the doctrine of nominative fair use, as provided for in paragraph 4(c)(i) of the Policy.

The Panel considers that the assessment of the Respondent’s claims requires a consideration of the broader circumstances of the case (see [WIPO Overview 3.0](#), section 2.5).

The disputed domain name itself is, at best, ambiguous about its relationship with, and any possible endorsement by, the Complainant, and does not clearly suggest that it is not associated with the Complainant.

Prior to the filing of the Complaint, there was no express indication on the Respondent’s website that it was not associated with nor endorsed by the Complainant. The nature of the Respondent’s website was such that it was, at best, ambiguous about its relationship with, and any possible endorsement by, the Complainant. A shield logo similar to the Complainant’s logo was prominently used, and the language used on the site promising high quality, exclusive leads was such that it is not inconceivable that the Complainant itself may have used such language to offer such services. This language and logo remain on the website to date. Furthermore, the use of the language such as “Your Partner in LegalShield Growth”, in the Panel’s view, goes beyond what is necessary to be able to qualify the Respondent’s targeted audience and, accordingly, the claimed purpose of referential fair use.

The Panel agrees with the following statement by the panel in *Thor Tech Inc. v. Eric Kline*, WIPO Case No. [D2023-4275](#) (emphasis added): “Where the trademark signals are ambiguous [as in the present case], the proponent of nominative fair use must clarify the relationship to avoid implied sponsorship or affiliation.” The Respondent’s initial site failed to do this.

To the extent the well-known test laid down in *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#) (“*Oki Data*”) applies in this case, the Panel considers that the Respondent has failed to meet the third *Oki Data* requirement, specifically: “the site must accurately and prominently disclose the registrant’s relationship with the trademark holder”. See [WIPO Overview 3.0](#), section 2.8.

At some point after the Complaint was filed, it appears that the Respondent added a disclaimer at the bottom of its website stating:

“LegalShieldLeads.com is an independent marketing and lead-generation platform and is not affiliated with, endorsed by, or sponsored by LegalShield® or Pre-Paid Legal Services, Inc. (PPLSI). LegalShield® is a registered trademark of PPLSI. References to LegalShield are used solely to identify the intended audience for our services.”

This disclaimer is included in text that is much smaller than the text employed on the rest of the website and is situated at the very bottom of the website. As such, it is easy to miss and is not effective at dispelling confusion. This does not meet the *Oki Data* requirement that the Respondent “prominently” disclose the Respondent’s (lack of) relationship with the Complainant. Noting also the Panel’s findings below, the presence of this disclaimer does not render the Respondent’s activities bona fide under the Policy.

For the above reasons, the Panel’s view is that the Respondent has failed to rebut the Complainant’s *prima facie* case and its website content cannot be viewed as supporting its claimed defense of nominative fair use.

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.

For the following reasons, the Panel finds that it is more likely than not that the Respondent registered and has used the disputed domain name to take advantage of a likelihood of confusion with the Complainant’s mark (this is true even though the term “legal” is disclaimed in the relevant mark) for the Respondent’s commercial gain, falling squarely within paragraph 4(b)(iv) of the Policy.

As discussed above, the disputed domain name itself coupled with its website are at best ambiguous about their relationship with the Complainant, and the Respondent has not sufficiently disclosed the lack of such a relationship. As such, it is likely that at least a significant number of users of the Respondent’s website may be confused about any association with or endorsement by the Complainant, and this was perfectly foreseeable. The Respondent, who appears to be sophisticated and well versed in Internet technology, was either aware of this risk, or should have been so aware, which points to bad faith. [WIPO Overview 3.0](#), section 3.2.2.

The fact that the Respondent subsequently applied a disclaimer to its website is effectively an acknowledgement of this risk. The fact that the Respondent applied after the Complaint had been filed a very inconspicuous disclaimer that is unlikely to be noticed rather indicates, in the Panel’s view, the Respondent’s intent to continue to benefit from user confusion.

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 <legalshieldleads.com> be transferred to the Complainant.

/Jeremy Speres/

Jeremy Speres

Sole Panelist

Date: January 15, 2026