

ADMINISTRATIVE PANEL DECISION

Lennar Pacific Properties Management, LLC, Lennar Corporation v. Natalia Rojas

Case No. D2025-5192

1. The Parties

The Complainants are Lennar Pacific Properties Management, LLC, and Lennar Corporation, United States of America (“United States”), represented by Slaters Harwell Campbell, LLP, United States.

The Respondent is Natalia Rojas, United States.

2. The Domain Name and Registrar

The disputed domain name <lennarinsurance.net> (the “Disputed Domain Name”) is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 11, 2025. On December 12, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On December 13, 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 (Registration Private Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainants on December 15, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainants to submit an amendment to the Complaint. The Complainants filed an amendment to the Complaint on December 15, 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 December 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 7, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 9, 2026.

The Center appointed Lynda M. Braun as the sole panelist in this matter on January 20, 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 Complainants are Lennar Pacific Properties Management, LLC (“LPPM”), and Lennar Corporation (“Lennar”), both Delaware corporations based in Miami, Florida, United States. The Complainants have offered real estate management, brokerage, development, construction and financial services since at least as early as 1973. LPPM is the owner of federal trademark registrations for the LENNAR mark. Lennar is a related company and an authorized licensee of the LENNAR marks and also owns and operates the domain name <lennar.com>, which resolves to the Complainants’ official website at “www.lennar.com”. LPPM and Lennar will hereinafter collectively be referred to as the “Complainant”.

The Complainant has been a leading homebuilder since 1954 and builds and sells homes in 21 states in the United States. The Complainant offers real estate, development, mortgage, financial, insurance, and brokerage services in connection with the construction and sale of homes. In connection with these services, the Complainant has offered services under the LENNAR trademarks since at least as early as 1973.

The Complainant owns the following registered trademarks through the United States Patent and Trademark Office (“USPTO”): LENNAR, United States Registration No. 3,108,401, registered on June 27, 2006, with a first use and first use in commerce of May 1973, in International Classes 35, 36, and 37; LENNAR, United States Registration No. 3,477,143, registered on July 29, 2008, in International Classes 36 and 37 (hereinafter collectively referred to as the “LENNAR Mark”).

On November 12, 2025, the Complainant’s counsel sent a cease-and-desist letter to the Respondent to demand, among other things, the transfer of the Disputed Domain Name but received no reply.

The Disputed Domain Name was registered on October 31, 2025, and currently resolves to an error landing page stating that the site could not be reached. The evidence of use provided by the Complainant shows a webpage with a contact form in Spanish, seemingly allowing Internet users to fill in their contact information to register for a free consultation with an expert advisor.

5. Parties’ Contentions

A. Complainants

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 LENNAR Mark because the Disputed Domain Name contains the LENNAR Mark in its entirety, followed by the term “insurance”, and then followed by the generic Top-Level Domain (“gTLD”) “.com”, which does not prevent a finding of confusing similarity;
- the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name because, among other things, the Complainant has not authorized the Respondent to register a domain name containing the LENNAR Mark, and the Respondent has never been commonly known by the Disputed Domain Name; and
- the Disputed Domain Name was registered and is being used in bad faith because, among other things, the

Respondent must have been aware of the LENNAR Mark when it registered the Disputed Domain Name, and the Respondent did not reply to the Complainant's cease-and-desist letter.

B. Respondent

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

6. Discussion and Findings

6.1 Preliminary Issue: Consolidation of the Complainants

The Complainants have requested their consolidation in this proceeding. Pursuant to the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11, the consolidation of multiple complainants filing a joint complaint against one or more respondents is subject to the discretion of the appointed panel. The Panel has concluded that consolidation of the Complainants would be appropriate in the present proceeding and would not have any unfair prejudicial effect on the Respondent. Moreover, the Complainants have been the target of common conduct by the Respondent, who has engaged in bad faith registration and use of the Disputed Domain Name. Furthermore, the Panel notes that the Complainants in the present administrative proceeding are affiliated since LPPM is the owner of federal trademark registrations for the LENNAR Mark and Lennar is a related company and authorized licensee of the LENNAR Mark. Moreover, Lennar also owns and operates the domain name <lennar.com>, which resolves to the Complainants' official website at "www.lennar.com", and which both parties use. Thus, the Panel considers that it is fair and equitable under the circumstances of the case to permit consolidation as the Complainants are not only affiliated companies but also have common interests. Therefore, the Panel concludes that consolidation of the Complainants is appropriate in this proceeding.

6.2 Substantive Issues

In order for the Complainant to prevail and have the Disputed Domain Name transferred to the Complainant, the Complainant must prove the following (Policy, paragraph 4(a)):

- (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 was registered and is being used in bad faith.

A. Identical or Confusingly Similar

Paragraph 4(a)(i) of the Policy requires a two-fold inquiry: a threshold investigation into whether a complainant has rights in a trademark, followed by an assessment of whether the disputed domain name is identical or confusingly similar to that trademark. The Panel concludes that in the present case, the Disputed Domain Name is confusingly similar to the LENNAR Mark as explained below.

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. See [WIPO Overview 3.0](#), section 1.7.

It is uncontroverted that the Complainant has established rights in the LENNAR Mark based on its years of use as well as the registered trademarks for the LENNAR Mark for insurance and other related services. The consensus view of panels is that "[w]here the complainant holds a nationally or regionally registered trademark or service mark, this prima facie satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case". See [WIPO Overview 3.0](#), section 1.2.1. Therefore, the Panel

finds that the Complainant has rights in the LENNAR Mark.

The Disputed Domain Name consists of the Complainant's registered LENNAR Mark in its entirety followed by the term "insurance" and then followed by the gTLD ".com". The test for confusing similarity involves a side-by-side comparison of the domain name and the textual components of the relevant trademark to assess whether the mark is recognizable within the disputed domain name. Here, the LENNAR Mark is recognizable within the Disputed Domain Name. As stated in section 1.8 of [WIPO Overview 3.0](#), "where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element". Thus, the addition of the term "insurance" to the Complainant's LENNAR Mark in the Disputed Domain Name does not prevent a finding of confusing similarity. See e.g., *Allianz Global Investors of America, L.P. and Pacific Investment Management Company (PIMCO) v. Bingo-Bongo*, WIPO Case No. [D2011-0795](#); and *Hoffmann-La Roche Inc. v. Wei-Chun Hsia*, WIPO Case No. [D2008-0923](#).

Finally, the addition of a gTLD such as ".com" in a domain name is a technical requirement. As such, it is well established that a gTLD may typically be disregarded when assessing whether a disputed domain name is identical or confusingly similar to a trademark. See *Proactiva Medio Ambiente, S.A. v. Proactiva*, WIPO Case No. [D2012-0182](#) and [WIPO Overview 3.0](#), section 1.11.1. Thus, the Panel finds that the Disputed Domain Name is confusingly similar to the Complainant's LENNAR Mark.

Based on the available record, the Panel finds that 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 that 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.

In this case, given the facts as set out above, the Panel finds that the Complainants has made out a prima facie case. The Respondent has not submitted any arguments or evidence to rebut the Complainant's prima facie case. Furthermore, the Complainant has not authorized, licensed, or otherwise permitted the Respondent to use its LENNAR Mark. Nor does the Complainant have any type of business relationship with the Respondent. There is also no evidence that the Respondent is commonly known by the Disputed Domain Name or by any similar name, nor any evidence that the Respondent was using or making demonstrable preparations to use the Disputed Domain Name in connection with a bona fide offering of goods or services. See Policy, paragraph 4(c).

Moreover, based on the use made of the Disputed Domain Name, previously to solicit Internet users' contact information, or the current use to resolve to an inactive error landing page, the Panel finds that the Respondent is not making a bona fide offering of goods or services nor making a legitimate noncommercial or fair use of the Disputed Domain Name under the circumstances of the case. See *Lego Juris A/S v. Nofel Izz, JID*, WIPO Case No. [D2019-2601](#).

In sum, the Panel finds that the Complainant has established an un rebutted prima facie case that the Respondent lacks rights or legitimate interests in the Disputed Domain Name.

Based on the available record, the Panel finds that 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.

The Panel finds that based on the record, the Complainant has demonstrated the existence of the Respondent's bad faith registration and use of the Disputed Domain Name pursuant to paragraph 4(a)(iii) of the Policy. 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.

Here, the Respondent registered and is using a domain name that is confusingly similar to the Complainant's trademark. The Panel concludes that the Respondent likely had actual knowledge of the Complainant and the LENNAR Mark and thus strains credulity to believe that the Respondent had not known of the Complainant or the LENNAR Mark when registering the Disputed Domain Name. See *Myer Stores Limited v. Mr. David John Singh*, WIPO Case No. [D2001-0763](#) ("a finding of bad faith may be made where the respondent 'knew or should have known' of the registration and/or use of the trademark prior to registering the domain name"). In sum, the Panel finds that the Respondent had the LENNAR Mark in mind when registering the Disputed Domain Name, another example of bad faith.

The Panel concludes that the Respondent's registration of the Disputed Domain Name was an attempt to disrupt the Complainant's business. The Respondent's use of the Disputed Domain Name was also likely to confuse Internet users into incorrectly believing that the Respondent was authorized by or affiliated with the Complainant.

Finally, the Respondent did not respond to the cease-and-desist letter sent by the Complainant's counsel. Past UDRP panels have held that failure to respond to a cease-and-desist letter may be considered a factor in finding bad faith registration and use of a domain name. See *Encyclopaedia Britannica, Inc. v. John Zuccarini and The Cupcake Patrol a/ka Country Walk a/k/a Cupcake Party*, WIPO Case No. [D2000-0330](#).

Based on the available record, the Panel finds that the third element of the Policy has been established.

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 <lennarinsurance.net> be transferred to the Complainant.

/Lynda M. Braun/

Lynda M. Braun

Sole Panelist

Date: February 3, 2026