

## **ADMINISTRATIVE PANEL DECISION**

**LEGO Holding A/S v. Wuchong Zhou, HK Hongyun International Business Limited**

**Case No. D2025-5382**

### **1. The Parties**

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

The Respondent is Wuchong Zhou, HK Hongyun International Business Limited, China.

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

The disputed domain name <legoesales.com> (the “Disputed Domain Name”) is registered with Dynadot Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 23, 2025. On December 23, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On December 24, 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 (DT), Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 24, 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 December 24, 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 amended Complaint, and the proceedings commenced on December 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 18, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 21, 2026.

The Center appointed Monica Novac as the sole panelist in this matter on January 26, 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 is a globally renowned Danish company established in 1932, specializing in the design, production, and sale of play materials. The Complainant has subsidiaries and branches all over the world, including five main hubs, 37 sales offices, five manufacturing sites and more than 500 retail stores. The Complainant employs over 28,500 people, while its LEGO branded products are sold in more than 130 countries worldwide.

The Complainant holds several trademark registrations for LEGO in various jurisdictions, including the following:

- China Trademark Registration No. 10176429 LEGO (word), registered on January 14, 2013, for goods in class 28;
- Hong Kong, China, Trademark Registration No. 302517660 LEGO (word), registered on February 6, 2013, for goods and services in classes 9, 28 and 41; and
- Hong Kong, China, Trademark Registration No. 19801105 LEGO (word), registered on February 17, 1979, for goods in classes 16 and 28.

Previous UDRP panels have already recognized the well-known character of the LEGO trademarks.

The Complainant holds more than 6,000 domain names comprising the LEGO trademark, including the domain name <lego.com> (registered on August 22, 1995), which redirects to the Complainant's official website.

The Respondent is Wuchong Zhou, HK Hongyun International Business Limited, reportedly located in China. The Respondent registered the Disputed Domain Name on November 7, 2025 through a privacy service. According to the evidence in the Complaint, the Disputed Domain Name used to resolve to a commercial website that featured a color scheme similar to that used by the Complainant on its own webpage, displayed the Complainant's LEGO mark and logo (also as a favicon), and offered for sale LEGO branded products. The Complainant contends that it has not been able to establish whether the goods sold on the webpage at the Disputed Domain Name were genuine or counterfeit. As shown by the Complainant, the "Contact Us" section of the website at the Disputed Domain Name provided the name and contact details of a company headquartered in the United Kingdom, which differ from those of the Respondent. The website at the Disputed Domain Name did not prominently display any disclaimer or any information regarding the relationship between the Respondent/the website operator and the Complainant. The Respondent is not an authorized reseller of the Complainant.

At the date of rendering this Decision, when accessed by the Panel, the Disputed Domain Name resolves to an inactive website.

## 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 Complainant's LEGO trademark;
- the Respondent has no rights or legitimate interests in the Disputed Domain Name; and
- the Disputed Domain Name has been registered and it is being used in bad faith.

### B. Respondent

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

## 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 LEGO trademark is reproduced within the Disputed Domain Name. Accordingly, the Disputed Domain Name is confusingly similar to the Complainant's trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Disputed Domain Name also contains the term "esales", which most likely represents a variation of the term "e-sales", referring to online sales. However, the Panel finds that the addition of this element does not prevent a finding of confusing similarity between the Disputed Domain Name and the Complainant's trademark for the purposes of the Policy. According to the [WIPO Overview 3.0](#), section 1.8, 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.

According to the [WIPO Overview 3.0](#), section 1.11.1, the generic Top-Level Domain ("gTLD") ".com" in the Disputed Domain Name is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test.

Further to all the above, 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.

It is accepted by the Panel that the Respondent is not related to the Complainant in any way and that the Complainant has not authorized nor licensed the Respondent to use the Complainant’s trademark. The Respondent is not an authorized reseller of the Complainant either. There is also no evidence that the Respondent is commonly known by the Disputed Domain Name.

Although at the time of this Decision, the Disputed Domain Name resolves to an inactive webpage, as per the evidence filed by the Complainant, it seems that the Disputed Domain Name used to resolve to a commercial website that featured a color scheme similar to that used by the Complainant on its official webpage, displayed the Complainant’s LEGO mark and logo (also as a favicon), and offered for sale LEGO branded products, without any prominent disclaimer regarding the lack of relationship between the Respondent and the Complainant. The Complainant contends that it has not been able to establish whether the goods sold on the webpage at the Disputed Domain Name were genuine or counterfeit. However, even if the Respondent was offering genuine LEGO branded products, the Respondent would not make fair use of the Complainant’s trademark in the Disputed Domain Name. UDRP panels have recognized resellers or distributors may have a legitimate interest to nominally use a trademark for its source-identifying function under certain circumstances, and such fair use is qualified under the so-called “Oki Data test” as per section 2.8.1 of the [WIPO Overview 3.0](#). Nevertheless, in the present matter, there is no evidence that the Respondent would meet the requirements of the “Oki Data test”.

The Panel considers that the composition of the Disputed Domain Name, coupled with its former use for a website that offered for sale LEGO branded products, while displaying the Complainant’s trademark and visuals, signals the Respondent’s intention of taking unfair advantage of the Complainant’s mark. Moreover, the Panel considers that the Respondent registered the Disputed Domain Name with the ultimate intent to mislead the Internet users and to erroneously make them believe that the Disputed Domain Name is operated by or associated with the Complainant.

It has been established that “respondent’s use of a domain name will not be considered “fair” if it falsely suggests affiliation with the trademark owner; the correlation between a domain name and the complainant’s mark is often central to this inquiry”. [WIPO Overview 3.0](#), section 2.5.

Also, 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.

In view of the above, the Panel is of the opinion that the Respondent does not use the Disputed Domain Name in connection with a bona fide offering of goods or services, nor does it make a legitimate noncommercial or fair use of the Disputed Domain Name as per the Policy.

The Respondent did not respond to the Complainant's contentions, thus the Respondent did not present any evidence for supporting any rights or legitimate interests in the Disputed Domain Name.

The Panel finds the second element of the Policy has been established.

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

The Panel refers to its considerations under section 6.B. above.

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.

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.

In the present case, the Panel notes that the Complainant registered and used its LEGO trademark long before the Respondent registered the Disputed Domain Name. In view of the worldwide reputation of the Complainant, the well-known character of its trademark, the composition of the Disputed Domain Name, as well as its previous use (as explained above), it is unlikely that the Respondent was not aware of the Complainant's trademark and business when registering the Disputed Domain Name. The Panel considers that the Respondent targeted the Complainant when registering the Disputed Domain Name.

Moreover, panels have consistently found that the mere registration of a domain name that is confusingly similar (particularly domain names incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4.

The Panel is of the opinion that the Respondent registered the Disputed Domain Name with the intent to mislead the Internet users into believing that the website at the Disputed Domain Name is affiliated with or endorsed by the Complainant, which is a clear proof of bad faith.

Paragraph 4(b)(iv) of the Policy provides that the use of a domain name to intentionally attempt "to attract, for commercial gain, Internet users to [the respondent's] web site or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of [the respondent's] web site or location or of a product or service on [the respondent's] web site or location" is evidence of registration and use in bad faith. In view of all the above, the Panel considers that the Respondent's intention was to attract Internet users to the webpage at the Disputed Domain Name, by creating a likelihood of confusion and making them believe that said webpage is held, controlled or related to the Complainant, for the Respondent's commercial gain.

Panels have held that the use of a domain name for illegitimate activity (here, claimed impersonation/passing off) constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

At the time of this Decision, the Disputed Domain Name does not resolve to an active webpage. However, 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 worldwide reputation of the Complainant's trademark, as well as the composition and prior use of the Disputed Domain Name, and finds that in the circumstances of this case, the current passive holding of the Disputed Domain Name does not prevent a finding of bad faith under the Policy.

Finally, the Respondent hid its identity when registering the Disputed Domain Name by using a privacy shield service. As per [WIPO Overview 3.0](#), section 3.6, there are recognized legitimate uses of privacy and proxy registration services; the circumstances in which such services are used, including whether the respondent is operating a commercial and trademark-abusive website, can impact a panel's assessment of bad faith. The Panel is of the opinion that in view of all circumstances of this case, the Respondent's use of privacy service constitutes further evidence of bad faith registration and use of the Disputed Domain Name.

The Panel also notes the Respondent's failure to submit a response in the present proceeding, which may be considered an additional indication of the Respondent's bad faith.

In view of the above, the Panel finds the Respondent's registration and use of the Disputed Domain Name constitute bad faith under the Policy.

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 <legoesales.com> be transferred to the Complainant.

*/Monica Novac/*

**Monica Novac**

Sole Panelist

Date: February 9, 2026