

## **ADMINISTRATIVE PANEL DECISION**

Moxie Robots, Inc. v. Zud Rkamoto  
Case No. D2026-0420

### **1. The Parties**

The Complainant is Moxie Robots, Inc., United States of America (“United States”), represented by Ikigai Law, India.

The Respondent is Zud Rkamoto, Thailand.

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

The disputed domain name <moxierobot.com> 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 February 2, 2026. On February 3, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 3, 2026, 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 (Domains by Proxy, LLC/Unknown Respondent) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 4, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. A third party sent communication to the Center on February 4, 2026. The Complainant filed an amended Complaint on February 6, 2026. On February 6, 2026, the Respondent offered to transfer the disputed domain name to the Complainant via a settlement procedure, which the Complainant did not accept.

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 February 10, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 2, 2026. The Respondent did not submit any formal response but offered to transfer the disputed domain name again on March 1, 2026.

The Center appointed Luca Barbero as the sole panelist in this matter on March 23, 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 (formerly DopeMind, Inc., and successor-in-interest to Embodied, Inc.) operates in the field of social robotics and artificial intelligence and was founded in 2016 by the roboticist Paolo Pirjanian.

In 2020, the Complainant's predecessor-in-interest Embodied, Inc. launched the MOXIE AI-powered robot, designed to support children's social, emotional, and cognitive development.

In 2025, the MOXIE mark and associated intellectual property were acquired through a documented transaction and are now owned by the Complainant, which continues the same product line and brand identity established by its predecessor, Embodied, Inc.

Over the years, the MOXIE robot has received widespread recognition and critical acclaim. The TIME Magazine named MOXIE one of the "100 Best Inventions of 2020", and the product was awarded the CES 2024 Innovation Award. In addition, the product received extensive media coverage, with articles on MOXIE robot appearing in famous magazines such as Forbes, CNN, and Wired.

The Complainant has provided evidence of ownership of trademarks consisting of, or comprising MOXIE, including the following:

- United States trademark registration No. 6975135 for MOXIE (word mark), filed on October 31, 2020, and registered on February 7, 2023, in international class 9;
- United States trademark registration No. 7329686 for MOXIE (figurative mark), filed on June 12, 2023, and registered on March 12, 2024, in international class 9;
- United States trademark registration No. 6405349, for MOXIECARE (word mark), filed on September 28, 2020, and registered on June 29, 2021, in international class 36.

The Complainant is also the owner of the domain name <moxierobots.com>, which was registered on March 5, 2019, and is used by the Complainant to promote its MOXIE robot.

The disputed domain name <moxierobot.com> was originally registered on March 5, 2019, by the Complainant's predecessor-in-interest Embodied, Inc. and subsequently transferred to the Complainant. After the registration inadvertently lapsed, the disputed domain name was acquired by the Respondent on or around April 7, 2025.

The disputed domain name is not currently pointed to an active website. However, based on the screenshots submitted by the Complainant – which have not been challenged by the Respondent –, prior to the present proceeding it was redirected, firstly, to an online gambling site, and subsequently to a website that mimicked an earlier version of the Complainant's official website, copying the website content, layout and color schemes.

#### **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 trademark MOXIE in which the Complainant has rights as it reproduces the trademark in its entirety with the mere addition of the descriptive term “robot” and the generic Top-Level Domain (“gTLD”) “.com”.

The Complainant submits that the Respondent has no rights or legitimate interests in the disputed domain name because: i) the Respondent is not licensed or authorized by the Complainant to use the Complainant's mark; ii) the Respondent is not commonly known by the disputed domain name; iii) the Respondent registered the disputed domain name to take advantage of the lapse of a domain name historically associated with the owner of the corresponding trademark MOXIE; iv) prior to the present proceeding, the Respondent has not used the disputed domain name for a bona fide offering of goods or services since it redirected the disputed domain name, first, to a website hosting a directory of “online slots” and gambling websites, and then to a website that mimicked an earlier version of the Complainant's official website, copying the branding, color schemes and layout of the Complainant's prior website to create a false impression of an affiliation with the Complainant.

With reference to bad faith use, the Complainant states that: i) the Respondent acquired the disputed domain name with constructive and actual notice of the Complainant's rights, including by virtue of the prior ownership of the disputed domain name by the Complainant's predecessor and its close similarity to the Complainant's primary domain name <moxierobots.com>; ii) according to information available on an online article, the Respondent acquired the disputed domain name on or around April 7, 2025, for a reported price of USD 21,500, following the Complainant's corporate restructuring and the payment of such a premium price confirms the Respondent's awareness of the brand's value and its intent to exploit it for commercial gain; iii) the slight variation from the Complainant's primary domain name <moxierobots.com> and the timing of the Respondent's registration, occurring immediately following the Complainant's corporate restructuring and the inadvertent lapse of the disputed domain name, suggests that the registration was made as a direct reaction to that transition and indicates an intentional attempt to attract Internet users to the Respondent's website by creating a likelihood of confusion with the Complainant's mark; iv) the gambling webpage to which the Respondent initially pointed the disputed domain name contained links to third-party betting websites, demonstrating that the Respondent registered the disputed domain primarily to capitalize on the Complainant's mark to generate commercial revenue through affiliate schemes; v) the Respondent's subsequent direction of the disputed domain name to a webpage that virtually replicated an earlier iteration of the Complainant's official website further confirms that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark and that the Respondent is using the disputed domain name to monetize the Complainant's traffic through various bad-faith schemes.

The Complainant also contends that the Respondent's use of the disputed domain name is particularly malicious because the Complainant's MOXIE brand is famous for children's educational robots but has been used by the Respondent to direct to an online gambling and slot machine portal, tarnishing the Complainant's reputation and exposing young children or their parents to inappropriate content.

The Complainant further submits that, following disclosure of the Respondent's identity by the Registrar, the Complainant's authorized representative was contacted by an individual purporting to act in relation to the disputed domain name whilst referencing the present UDRP proceeding. The individual, purportedly the Respondent or an associate acting on his behalf, acknowledged the Complainant's trademark interests and proposed a voluntary transfer of the disputed domain name in exchange for monetary consideration allegedly covering registration costs and development efforts. The Complainant submits this correspondence is further evidence of knowledge of the Complainant's rights and of the Respondent's intent to derive commercial value from the disputed domain name.

## **B. Respondent**

The Respondent did not submit any formal Response but, through two informal communications sent to the Center respectively on February 6, 2026, and March 1, 2026, offered to voluntarily transfer the disputed domain name to the Complainant.

## **6. Discussion and Findings**

According to paragraph 15(a) of the Rules: “A Panel shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.” Paragraph 4(a) of the Policy directs that the Complainant must prove each of the following:

- (i) that the disputed domain name registered by the Respondent is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) that 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 of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. Indeed, the Complainant has provided evidence of ownership of valid trademark registrations for MOXIE. [WIPO Overview 3.1](#), 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 3.1](#), section 1.7.

Although the addition of other terms such as “robot” 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 3.1](#), section 1.8.

As to the gTLD “.com”, it is a standard registration requirement and can be disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

Therefore, 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 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 3.1](#), 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.

According to the evidence on record, there is no relationship between the Complainant and the Respondent, and the Complainant has not authorized the Respondent to register or use its trademark or the disputed domain name. Moreover, there is no element from which the Panel could infer the Respondent's rights over the disputed domain name, or that the Respondent might be commonly known by the disputed domain name.

Furthermore, there is no evidence showing that the Respondent made use of, or preparations to use, the disputed domain name in connection with a bona fide offering of goods or services or a legitimate noncommercial use without intention to misleadingly divert consumers or to tarnish the MOXIE mark.

Indeed, even though the disputed domain name does not currently resolve to an active website, based on the evidence provided by the Complainant – which has not been contested by the Respondent –, the Respondent pointed the disputed domain name firstly to an online gambling and slot machine portal and subsequently to a webpage that virtually replicated an earlier iteration of the Complainant's official website, including images and trademarks, thereby creating a likelihood of confusion and association with the Complainant and its trademark.

In addition to the above, the Panel finds that the disputed domain name is inherently misleading as it combines the Complainant's trademark MOXIE with the term "robot", which is descriptive of the Complainant's product. Therefore, the Panel finds that the disputed domain name is inherently misleading as it suggests an affiliation with the Complainant and that its very selection by the Respondent suggests an intent to capitalize on the Complainant's trademark.

Therefore, the Panel finds the second element of the Policy has also 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 transfer of a domain name registration from a third party to the respondent is not a renewal and the date on which the current registrant acquired the domain name is the date a panel will consider in assessing bad faith. [WIPO Overview 3.0](#), section 3.9. In the present case, the Panel notes that, in light of the prior registration and use of the MOXIE trademark in connection with the Complainant's AI-powered product, promoted online via the Complainant's website "www.moxierobots.com", and considering the disputed domain name was previously owned and used by the Complainant's predecessor-in-interest and, subsequently, by the Complainant, which used it as well to promote its MOXIE trademark and product, the Respondent was or should have been aware of the Complainant's trademark at the time it acquired the disputed domain name, which occurred only in April 2025 according to the records. [WIPO Overview 3.0](#), section 3.2.2.

Moreover, in view of the composition of the disputed domain name, which is clearly referred to the Complainant's MOXIE robot and is almost identical to the Complainant's domain name <moxierobots.com>, and considering the timing of the acquisition of the disputed domain name by the Respondent, following the expiry of the same during the Complainant's corporate restructuring, the Panel finds that the Respondent was indeed well aware of, and intended to target, the Complainant's trademark.

The Panel also finds that the use of the disputed domain name, to direct users firstly to an online gambling and slot machine portal and subsequently to a webpage that virtually replicated an earlier iteration of the Complainant's official website, suggests that the Respondent intentionally attempted to attract Internet users to its website and/or to linked websites for commercial gain, by creating a likelihood of confusion with the MOXIE mark as to the source, sponsorship, affiliation or endorsement of the websites according to paragraph 4(b)(iv) of the Policy.

The disputed domain name currently does not resolve to an active website. 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 of the Complainant's trademark in its sector, the prior use of the disputed domain name made by the Respondent and its failure to provide any evidence of actual or contemplated good-faith use, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Therefore, the Panel finds that the Complainant has established the third element of the Policy as well.

## **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 <moxierobot.com> be transferred to the Complainant.

*/Luca Barbero/*

**Luca Barbero**

Sole Panelist

Date: April 9, 2026