

## **ADMINISTRATIVE PANEL DECISION**

HeyGen Technology Inc. v. Mazhar Alvi  
Case No. D2026-0902

### **1. The Parties**

The Complainant is HeyGen Technology Inc., United States of America ("United States"), represented by Coates IP LLP, United States.

The Respondent is Mazhar Alvi, Pakistan.

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

The disputed domain name <heygenvoice.com> is registered with Hostinger Operations, UAB (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on March 2, 2026. On March 3, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 4, 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 (Unknown Respondent) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 9, 2026, 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 March 11, 2026.

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 March 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 1, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 7, 2026.

The Center appointed Jane Seager as the sole panelist in this matter on April 17, 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 Delaware corporation based in Los Angeles, California, United States, engaged in video and image generation in artificial intelligence ("AI"), allowing users to create photo-realistic video avatars using the likeness of real people or a library of pre-made avatars and voices. The Complainant was founded in 2020 and launched its platform and services in September 2022. The Complainant operates via its domain name <heygen.com>, as well as via its mobile application and APIs.

The Complainant owns trademark registrations for HEYGEN, including the following:

- Canadian Trademark Registration No. TMA1352040, HEYGEN, registered on October 3, 2025;
- European Union Trade Mark No. 018908079, HEYGEN, registered on December 26, 2023;
- United Kingdom Trademark Registration No. UK00003940036, HEYGEN, registered on October 27, 2023;
- United States Trademark Registration No. 7725074, HEYGEN, registered on March 11, 2025; and
- United States Trademark Registration No. 8103515, HEYGEN, registered on January 13, 2026.

The Respondent appears to be an individual based in Pakistan. The disputed domain name was registered on February 2, 2026. The disputed domain name resolves to a website (the "Respondent's website") offering competing AI vocal generation products and services, using the HEYGEN trademark and a logo resembling that 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.

The Complainant asserts rights in the HEYGEN trademark. The Complainant submits that the disputed domain name is confusingly similar to its HEYGEN trademark.

The Complainant submits that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is not authorized to use the HEYGEN trademark. The Complainant asserts that the Respondent's website offers competing AI vocal generation products and services using the HEYGEN trademark and alleges that the Respondent collects user information under false pretences. The Complainant submits that the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services, that the Respondent is not commonly known by the disputed domain name, and that the Respondent is not making any legitimate noncommercial or fair use of the disputed domain name.

The Complainant submits that the disputed domain name was registered and is being used in bad faith. According to the Complainant, the Respondent's website offers competing AI generation products and services under the HEYGEN trademark, evidencing an attempt to trade off the well-known status and fame of the Complainant's mark. The Complainant alleges that the Respondent's website prompts users to enter

login and personal information, which may be used for improper purposes, such as phishing. The Complainant claims that the disputed domain name was registered to prevent the Complainant from registering it and to deceive consumers for the Respondent's commercial gain or other improper purposes.

The Complainant requests transfer of the disputed domain name.

## **B. Respondent**

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

## **6. Discussion and Findings**

In order to prevail, the Complainant must demonstrate that it has satisfied the requirements of paragraph 4(a) of the Policy:

- (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 was 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. [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, here "voice", 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.

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.

There is no evidence of any relationship between the Parties. The Complainant has not granted any licence or authorization to the Respondent to make use of its trademark.

As noted above, the disputed domain name resolves to a website that offers overlapping and competing AI vocal generation products and services under the Complainant's HEYGEN trademark. Internet users viewing the Respondent's website are likely to be confused as to the source of the Respondent's website and the services offered therein. The Panel finds that the Respondent is using the disputed domain name in an attempt to trade on the goodwill and reputation associated with the Complainant's trademark. The Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services pursuant to paragraph 4(c)(i) of the Policy. Such use of the disputed domain name does not give rise to any legitimate claim that the Respondent is commonly known by the disputed domain name within the meaning of paragraph 4(c)(ii) of the Policy. The Respondent's website is clearly commercial in nature as evidenced by the offering of paid AI vocal generation services; the Respondent is not making any legitimate noncommercial or fair use of the disputed domain name as contemplated by paragraph 4(c)(iii) of the Policy.

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.

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.

The Complainant's HEYGEN trademark was adopted in 2020, registered from late-2023, and became well known in its field prior to the Respondent's registration of the disputed domain name on February 2, 2026. The Complainant has provided details of its global user base, media coverage, awards, and recognition. The Panel infers from the Respondent's use of the disputed domain name, as described above, that the Respondent knew of the Complainant and its trademark when registering the disputed domain name, and proceeded to do so knowing that the disputed domain name was likely to mislead Internet users as to the source of the disputed domain name, in bad faith.

The Panel further finds that by using the disputed domain name, 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 HEYGEN trademark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website and the services offered therein in bad faith pursuant to paragraph 4(b)(iv) of 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 <heygenvoice.com> be transferred to the Complainant.

*/Jane Seager/*

**Jane Seager**

Sole Panelist

Date: May 5, 2026