

ADMINISTRATIVE PANEL DECISION

HeyGen Technology Inc. v. f z
Case No. D2026-1385

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 f z, China.

2. The Domain Name and Registrar

The disputed domain name <heygen.site> is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 1, 2026. On April 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 1, 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 / Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 2, 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 April 4, 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 April 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 27, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 28, 2026.

The Center appointed Delia-Mihaela Belciu as the sole panelist in this matter on April 30, 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, a United States company, founded in 2020, is one of the leading companies in video and image generation in artificial intelligence (AI). The Complainant allows for users to create photorealistic video avatars using the likeness of real people or a library of pre-made avatars and voices. The Complainant's digital avatars can recite prompts in 175 languages.

The company has undergone several investing rounds, including in June 2024 which raised USD \$60 million with a company valuation of USD \$500 million. At that time, the Complainant reported having more than 40,000 customers globally, and an annualized revenue of USD \$35 million.

In the last five years, the Complainant has been recognized as being one of the most successful startups.

The Complainant has been recognized by Forbes as part of its "Next Billion-Dollar Startups", Fast Company as part of its "Next Big Things in Tech" list, by Inc. as part of its 2024 Best in Business list, and Business Insider as part of its "85 of the Most Prominent Startups."

The Complainant is in particular the owner of the following HEYGEN trademark registrations:

- the United States Registration No. 7725074 for HEYGEN, registered on March 11, 2025, for services in class 42;
- the European Union Trademark No. 018908079 for HEYGEN, registered on December 26, 2023, for goods and services in classes 9 and 42;
- the Australian Trademark No. 2375990 for HEYGEN, registered on July 31, 2023, having a priority date of February 22, 2023, for goods and services in classes 9 and 42.

The Complainant has offered its services in a downloadable mobile app, as well as through a host of software APIs through its website "www.heygen.com", since at least March 2023.

The disputed domain name <heygen.site> was registered on September 16, 2025, and corresponds to an active website, displaying the Complainant's HEYGEN mark, and offering AI image and video generation products, similar or identical to the Complainant's ones, offered under its HEYGEN mark.

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:

(i) the disputed domain name is identical to the Complainant's HEYGEN mark, as it incorporates it in its entirety, followed by the generic Top-Level Domain ("gTLD") ".site.";

(ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name for a number of reasons, among which that: (1) the Respondent does not have a license to offer products or services under the Complainant's HEYGEN mark; (2) the disputed domain name resolves to a website featuring overlapping and competing products and services in connection with the Complainant's HEYGEN mark; (3) the HEYGEN mark is a term, with no meaning in any language, used solely to identify the Complainant and its products and services; (4) the Respondent is not commonly known by the disputed domain name, and has acquired no trademark or service mark rights in the HEYGEN mark;

(iii) the disputed domain name was registered and is being used in bad faith for a number of reasons, among which that, (1) the disputed domain name resolves to a website that offers competing AI video generation products and services under the HEYGEN mark in order to confuse, deceive customers into believing that they are purchasing the Complainant's products and services; (2) the Respondent is also using the HEYGEN mark and copy language in the search engine optimization algorithms in relation to the website corresponding to the disputed domain name, in order to misdirect users searching for the Complainant to the Respondent's website; (3) the disputed domain name was registered to prevent the Complainant from registering it.

B. Respondents

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

6. Discussion and Findings

In order for the Complainant to succeed, such must prove, according to paragraph 4(a) of the Policy, that:

(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 with respect to the disputed domain name; and

(iii) the disputed domain name has been registered and is being used in bad faith.

In case all three elements above have been fulfilled, the Panel is able to grant the remedy requested by the Complainant. Thus, the Panel will deal with each of the requirements in turn.

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 HEYGEN mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

In what concerns the addition of the gTLD “.site” in relation to the disputed domain name, such is viewed as a standard registration requirement, and is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

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.

Thus, based on the available evidence, the Respondent does not appear to be commonly known by the name “heygen”.

The Respondent is not a licensee of the Complainant. The Complainant has never authorised the Respondent to make use of its HEYGEN mark in the disputed domain name.

The composition of the disputed domain name, incorporating the Complainant’s HEYGEN mark in its entirety, carries a high risk of implied affiliation. [WIPO Overview 3.1](#), section 2.5.1.

Based on the available evidence, the disputed domain name resolves to a website that offers competing AI video generation products and services under the HEYGEN mark, while also using the HEYGEN mark and copy language in the search engine optimization algorithms for this website, in order to misdirect users searching for the Complainant to the website corresponding to the disputed domain name.

Panels have held that the use of a domain name for illegal activity, as in this case passing off, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

All the above does not amount to a bona fide offering of goods or services, or to a legitimate noncommercial or fair use of 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.

In the present case, the Panel notes that the Complainant's rights in the HEYGEN mark predate the registration date of the disputed domain name.

In light of the above, the Panel finds that it is not conceivable that the Respondent registered the disputed domain name without knowledge of the Complainant's HEYGEN mark, which supports a finding of bad faith registration. [WIPO Overview 3.1](#), section 3.2.2.

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 3.1](#), section 3.2.1.

The Respondent's incorporation into the disputed domain name of the Complainant's HEYGEN mark in its entirety, the offering of competing AI video generation products and services under the HEYGEN mark on the website corresponding to the disputed domain name, while also using the HEYGEN mark and copy language in the search engine optimization algorithms in relation to this website, in order to misdirect users searching for the Complainant to the website corresponding to the disputed domain name, is clear evidence of bad faith use and registration of a domain name, and all lead to a finding of bad faith registration and use. Moreover, the Panel finds that by using the disputed domain name, the Respondent has intentionally attempted to attract Internet users to his the website by creating a likelihood of confusion with the Complainant's HEYGEN mark as to the source, sponsorship, affiliation, or endorsement of the website.

Panels have held that the use of a domain name for an illegal activity, as in this case passing off, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy and 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 <heygen.site> be transferred to the Complainant.

/Delia-Mihaela Belciu/

Delia-Mihaela Belciu

Sole Panelist

Date: May 14, 2026