

ADMINISTRATIVE PANEL DECISION

LegalZoom.com, Inc. v. Rose William
Case No. D2026-1466

1. The Parties

The Complainant is LegalZoom.com, Inc., United States of America ("United States"), represented by Bryan Cave Leighton Paisner LLP, United States.

The Respondent is Rose William, United States.

2. The Domain Names and Registrar

The disputed domain names <legalzoomtrademarks.com> and <legalzoomus.com> are registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 7, 2026. On April 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On April 8, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted for Privacy, 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 8, 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 14, 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 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 6, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on May 8, 2026.

The Center appointed Ingrida Kariņa-Bērziņa as the sole panelist in this matter on May 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 Complainant is a technology company, based in California, United States, that offers online legal and business services to small businesses and consumers. The Complainant is the proprietor of numerous registrations for its LEGALZOOM trademark, including the following:

- United States Trademark Registration No. 3210861 for LEGALZOOM (word mark), registered on February 20, 2007, for services in class 35, claiming a date of first use in 2000; and
- United States Trademark Registration No. 3210728 for LEGALZOOM (word mark), registered on February 20, 2007, for services in class 42, claiming a date of first use in 2000.

The Complainant operates its primary business website at the domain name <legalzoom.com>.

The disputed domain name <legalzoomtrademarks.com> was registered on February 11, 2026. The disputed domain name <legalzoomus.com> was registered on March 19, 2026. At the time of this Decision, neither resolved to an active website. The Complainant provides evidence that the disputed domain names previously resolved to websites reflecting the Complainant's LEGALZOOM mark and imitating the colors, layout and fonts of the Complainant's website. The Respondent's websites both displayed the headline "Secure Your Patent With Ease—Without Paying Law Firm Rates", inviting Internet users to purchase patent and trademark filing services.

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 names.

Notably, the Complainant contends that it has offered legal and business support services online under the LEGALZOOM mark since at least 2001. The Complainant's primary market is the United States and one of its core offerings is trademark registration services. The LEGALZOOM mark has become well-known through extensive promotion and has been mentioned in numerous media outlets in connection with awards, participation in industry events, and innovative offerings. The disputed domain names incorporate the mark together with descriptive terms that refer to the Complainant's core market and services. The Respondent has no rights in the disputed domain names and is not authorized by the Complainant to use its mark. The Complainant's LEGALZOOM mark is an invented term that was deliberately selected by the Respondent to benefit from the Complainant's reputation and goodwill. The Respondent purports to offer services identical to that of the Complainant. The Complainant reports that an Internet user contacted its customer-support service seeking information about the Respondent, indicating actual confusion.

The Complainant requests transfer of the disputed domain names.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the UDRP requires Complainant to make out all three of the following:

- (i) the disputed domain names are 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 names; and
- (iii) the Respondent has registered and is using the disputed domain names in bad faith.

Under 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”.

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 Complainant’s LEGALZOOM mark is reproduced within the disputed domain names. Accordingly, the disputed domain names are 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, “trademarks” and “us”) may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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.

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 names. 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 names such as those enumerated in the Policy or otherwise.

The Panel finds that the Respondent is using the disputed domain names, which incorporate the Complainant's well-established LEGALZOOM mark, to lure Internet users to its own commercial websites offering legal services - a classic bait-and-switch scheme creating confusion for commercial gain. The Respondent has not put forward any rights or legitimate interests. There is no evidence that the Respondent is commonly known by the disputed domain names, nor that there are any circumstances or activities that would establish the Respondent's rights therein.

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.

In the present case, the Panel notes that the Respondent intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark. The Complainant established rights in its LEGALZOOM mark over 15 years prior to the registration of the disputed domain names, which reflect the LEGALZOOM mark in its entirety, together with the descriptive terms "trademarks", and "us", referring to the United States, where the Complainant is established. On this record, the Panel finds that the disputed domain names were registered in bad faith. [WIPO Overview 3.1](#), section 3.1.4.

The record reviewed by the Panel leaves no doubt that the Respondent selected the disputed domain names that reflect the Complainant's earlier mark and proceeded to use the disputed domain names to offer services similar to those offered by the Complainant through websites imitating those of the Complainant and displaying the Complainant's mark. The Panel further notes evidence of actual confusion in the record. In particular, the evidence shows that a customer of the Complainant contacted the Complainant seeking information regarding an order that the Complainant was unable to locate in its system and subsequently provided invoices and related materials demonstrating that the customer had purchased services through the websites associated with the disputed domain names under the mistaken belief that the customer was dealing with the Complainant. The Panel also notes evidence that an operator of the website associated with the disputed domain names, during a live chat interaction, held itself out as, or otherwise created the impression that it was, the Complainant. The evidence in the case file as presented indicates that the Respondent's aim in registering and using the disputed domain names was to profit from or exploit the Complainant's trademark.

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 names <legalzoomtrademarks.com> and <legalzoomus.com> be transferred to the Complainant.

/Ingrīda Kariņa-Bērziņa/

Ingrīda Kariņa-Bērziņa

Sole Panelist

Date: June 3, 2026