

ADMINISTRATIVE PANEL DECISION

HeyGen Technology Inc. v. z zz

Case No. D2026-2169

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 z zz, China.

2. The Domain Name and Registrar

The disputed domain name <heygenai.app> is registered with Spaceship, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 19, 2026. On May 20, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 21, 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 May 22, 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 May 23, 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 May 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 16, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 17, 2026.

The Center appointed Alistair Payne as the sole panelist in this matter on July 2, 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, based in Los Angeles, California, was founded in 2020 and provides a platform and services under the HEYGEN mark enabling users to create photo realistic video avatars using the likeness of real people or a library of pre-made avatars and voices. The Complainant owns various trade mark registrations worldwide for its HEYGEN trade mark, including United States trade mark registration 7725074 for the HEYGEN word mark registered on March 11, 2025. The Complainant has also registered a distinctive pyramid logo mark and owns and uses the domain names <heygen.com> and <heygen.ai> from which it operates its website platform. As of June 2024 the Complainant reported having more than 40,000 customers globally and an annualized revenue of USD35 million. In the last five years the Complainant has been recognized by Forbes magazine as part of its Next Billion-Dollar Startups.

The disputed domain name was created on December 24, 2025, and resolves to a website which features the HEYGEN mark, a reproduction of the Complainant's pyramid logo mark and purports to offer services that are identical or similar to the services provided by the Complainant at its website. The website at the disputed domain name also provides links to other websites including some of which appear to be owned by the Respondent and also to the Complainant's own website and to third party owned websites.

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 wholly incorporates its HEYGEN mark and is therefore confusingly similar to it and that the addition of the term "ai" in the disputed domain name does not distinguish the disputed domain name.

The Complainant submits that the HEYGEN Mark is a coined term, with no meaning in any language and is solely used to identify the Complainant's products and services. According to the Complainant, the Respondent is not commonly known by the disputed domain name and has acquired no trade mark or service mark rights in the HEYGEN Mark.

The Complainant submits that the website to which the disputed domain name resolves features the Complainant's HEYGEN mark and its pyramid logo and adopts the same look and feel as the Complainant's website so as to give the impression that it is the Complainant's own website. The Complainant says that the Respondent amplifies this impersonation by including a number of links on its website directly to the Complainant's website as well as providing in its footer a number of links to its own, or to third party, websites, under a "friends" menu which include gaming and competing AI sites. According to the Complainant, these sites follow a similar template as the disputed domain name's resolving website and include identical terms of service and privacy policies, indicating that they are owned and controlled by Respondent.

This conduct, says the Complainant, amounts to trading on its established reputation and goodwill and amounts to a passing off or impersonation which cannot amount to the Respondent having a legitimate right or interest in the disputed domain name nor to non-commercial or fair use of the disputed domain name. The Complainant also suggests that by using this series of linked websites, the Respondent captures, retains, and aggregates legitimate user time and traffic on its websites which allows the Respondent to collect and mine user data, build security legitimacy, and increase visibility through traffic rankings, which

makes the disputed domain name inherently more valuable and a useful and measurable asset. The Complainant says that the Respondent gains commercially and that this is not bona fide conduct supporting rights or legitimate interests in the disputed domain name.

The Complainant submits that its HEYGEN mark is a coined and distinctive term and that it was used by the Complainant from 2022 and that the registration of it as a trade mark pre-dates the registration of the disputed domain name. It says that that its use by the Respondent on the website to which the disputed domain name resolves and the fact that there are links from the website to the Complainant's website, are strongly indicative of the Respondent knowing of the Complainant's mark at the time of registration of the disputed domain name and of an intention to target the mark and to trade on the goodwill and reputation attaching to it.

The Complainant submits that the Respondent is using the disputed domain name in the manner described above to pass itself off as the Complainant and to attract, for commercial gain, Internet users to the Respondent's website by creating a likelihood of confusion with the Complainant in terms of paragraph 4(b)(iv) of the Policy. It says that the Respondent is also blatantly using the disputed domain name in bad faith to target the Complainant, mislead users searching for the Complainant and to ride on the well-known status and fame of the name HEYGEN Mark and that previous panels have found that this sort of conduct amounts to evidence of bad faith WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 3.1.1.

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 trade mark and the disputed domain name. [WIPO Overview 3.1](#), section 1.7.

The Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the mark is recognizable 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 the abbreviation "ai", 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.

The Complainant has submitted that the HEYGEN Mark is a coined term, with no meaning in any language and is solely used to identify the Complainant’s products and services. It has also submitted that the Respondent is not commonly known by the disputed domain name and has acquired no trade mark or service mark rights in the HEYGEN Mark.

The Respondent’s conduct, as described at section 5(A) above amounts to impersonation of the Complainant’s business and website and to trading on the established reputation and goodwill attaching to its trade mark. This conduct does not support an argument that the Respondent has legitimate rights or interests in the disputed domain name or that it is making a noncommercial or fair use of the disputed domain name. In addition, the Complainant has submitted that the Respondent has gained commercially from the various website links on the website at the disputed domain name and that this does not amount to bona fide conduct supporting rights or legitimate interests in the disputed domain name

Having reviewed the available record, the Panel finds that 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.

In the present case, the Panel notes that the disputed domain name was registered after the registration of the Complainant’s trade mark and several years after the Complainant first started using its HEYGEN mark. The fact that the website to which the disputed domain name resolves features the HEYGEN mark, the Complainant’s pyramid logo and offers similar or identical services supports that the Respondent had actual knowledge of the Complainant’s business and mark at the time of registration of the disputed domain name.

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.

Under paragraph 4(b)(iv) of the Policy there is evidence of registration and use of the disputed domain name in bad faith where a Respondent has used the disputed domain name to intentionally attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant’s trade marks as to the source, sponsorship, affiliation or endorsement of the website.

In this case the Respondent has used the disputed domain name to divert Internet users to its website at the disputed domain name which masquerades as if it is owned by the Complainant, or is affiliated with the Complainant, without distinguishing itself properly, or using a disclaimer. The website to which the disputed

domain name resolves contains the Complainant's HEYGEN mark, its pyramid logo and has various similarities which afford it a similar look and feel including by offering an AI image and video generation product identical or similar to that offered by the Complainant. Internet users could easily have been confused into thinking that this was the Complainant's site or an affiliated site. This conduct therefore fulfills the requirements of paragraph 4(b)(iv) of the Policy and is evidence of registration and use of the disputed domain name in bad faith.

The Panel agrees with the Complainant that the Respondent is blatantly using the disputed domain name, which appears to have been intentionally chosen using the HEYGEN mark to target the Complainant, mislead users searching for the Complainant and to confuse them when they arrive at its website into thinking that it is the Complainant's or is related to it and potentially to divert them to its other websites for the Respondent's own commercial gain. This amounts to evidence of conduct in bad faith.

The Panel's view of the Respondent's bad faith is further reinforced by the name and address information for the Respondent provided by the Registrar upon request from the Center. Both the name and address elements provided are incomplete and the Panel notes that the Respondent initially used a privacy service to mask its identity.

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 <heygenai.app> be transferred to the Complainant.

/Alistair Payne/

Alistair Payne

Sole Panelist

Date: July 15, 2026