ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Lennar Pacific Properties Management, LLC, Lennar Corporation v. Bush Fire
Case No. D2026-2551

1. The Parties

The Complainants are Lennar Pacific Properties Management, LLC, United States of America (the “United States” or “US”), and Lennar Corporation, United States, represented by Slates Harwell Campbell, LLP, United States.

The Respondent is Bush Fire, United States.

2. The Domain Name and Registrar

The disputed domain name <lennarbiz.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 11, 2026. On June 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 15, 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 (The RDAP server redacted the value / Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainants on June 16, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainants to submit an amendment to the Complaint. The Complainants filed an amendment to the Complaint on June 16, 2026.

The Center verified that the Complaint together with the amendment to the 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 June 25, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 15, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 17, 2026.

The Center appointed Raj Sachdev as the sole panelist in this matter on July 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, Lennar Pacific Properties Management, LLC is the owner of two federal trademark registrations for LENNAR marks, U.S. Reg. No. 3,108,401 registered June 27, 2006, and U.S. Reg. No. 3,477,143 registered July 29, 2008. The other Complainant, Lennar Corporation, is a related company and authorized licensee of the said LENNAR marks and also owns and operates a website under the domain <lennar.com>. Both Complainants have a common legal interest in this matter. Under the said LENNAR marks, Complainants offer real estate, development, mortgage, financial, and brokerage services in connection with the construction and sale of homes in a number of U.S. states.

The disputed domain name was registered on June 23, 2025, using a privacy service and resolves to a “This site can’t be reached” message. The Complainant provides evidence of email communications between an email address associated with the disputed domain and that of a supplier purporting to purchase goods on behalf of an employee of the Complainant Lennar Corporation.

The Registrar, noted the registration to have been filed under the Respondent’s name, Bush Fire, with an address in the United States.

5. Parties’ Contentions

A. Complainants

The Complainants contend that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Complainants contend that the disputed domain name is confusingly similar to the LENNAR marks because it contains the LENNAR mark. The Complainants also contend that the Respondent is not generally known by the disputed domain name, and has never engaged in any bona fide commercial activity in connection with the disputed domain name. The Complainants further contend that the Respondent has no rights or legitimate interests in the Complainants’ trademarks and has registered and used the disputed domain name in bad faith to perpetrate scams and impersonate the Complainants. The Complainants have provided evidence that the disputed domain name was used for sending fraudulent emails impersonating an employee of the Complainant Lennar Corporation.

B. Respondent

The Respondent did not reply to the Complainants’ contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, to succeed the Complainants must satisfy the Panel that: (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainants have 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.

6.1 Preliminary Issue: Standing and Consolidation of Multiple Complainants

There are two Complainants in this matter. The Complainant, Lennar Pacific Properties Management, LLC is the owner of two U.S. federal trademark registrations for LENNAR marks as noted in Section 4 above. The other Complainant, Lennar Corporation, is a related company and authorized licensee of the said LENNAR marks and also owns and operates a website under the domain name <lennar.com>.

As to standing, "[a] trademark owner's affiliate such as a subsidiary of a parent or of a holding company, or an exclusive trademark licensee, is considered to have rights in a trademark under the UDRP for purposes of standing to file a complaint. The same holds true for a parent company filing a UDRP case on the basis of rights held in the name of one of the companies or brands under its corporate umbrella" (see WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.4). Given that Lennar Pacific Properties Management, LLC owns and Lennar Corporation is a related parent company and licensee of the said marks, the Panel finds that both Complainants having standing in this matter.

The Complainants have requested a consolidation of their dispute with a single Respondent in this matter. In general, "panels look at whether (i) the complainants have a specific common grievance against the respondent, or the respondent has engaged in common conduct that has affected the complainants in a similar fashion, and (ii) it would be equitable and procedurally efficient to permit the consolidation" (see WIPO Overview 3.1, section 4.11.1). As both Complainants also have a common legal interest in this matter, given that their owned or licensed trademark has been targeted, and that the Respondent common conduct targets said mark using the single disputed domain name, and that handling this in a manner that is equitable and more efficient to consolidate rather than to hear separately, the Panel decides that the matter should be consolidated. The Complainants are hereinafter collectively referred to as the "Complainant".

6.2 Substantive Issues

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 (see WIPO Overview 3.1, section 1.7).

The Complainant has shown rights in respect of the LENNAR mark for the purposes of the Policy through its trademark registrations including the United States registrations referenced in the Factual Background section above (see WIPO Overview 3.1, section 1.2.1).

The LENNAR mark is entirely reproduced within the disputed domain name along with the addition of "biz". As is the case here, where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar to that mark (see WIPO Overview 3.1, section 1.7). Although the addition of another term, here, "biz," 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 (see WIPO Overview 3.1, section 1.8 and *Lennar Pacific Properties Management, Inc., Lennar Corporation v. Registration Private, Domains By Proxy, LLC / IAutomation Contractors* WIPO Case No. D2022-1768). Accordingly, the disputed domain name is confusingly similar to the LENNAR mark for the purposes of the Policy.

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 (see 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 submitted a response and accordingly 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. There is no evidence that the Respondent is commonly known by the disputed domain name. Further, there is no evidence of any bona fide offering of goods or services, or legitimate noncommercial use.

Panels have held that the use of a domain name for illegitimate or illegal activity such as phishing/identity theft, passing off, or other types of fraud can never confer rights or legitimate interests on a respondent (WIPO Overview 3.1, section 2.13.1). Specifically, panels have held that illegal activity and a deceptive use of the disputed domain name such as impersonation cannot confer such rights (*see Lonza Ltd v. Geral Gera, SEGLINK,* WIPO Case No. D2025-1342; CGI Inc. v. *Christophe Schmidt* Case No. D2024-5269; *SESSUN v. Samuel Williams Williams* Case No. D2023-2132). The Complainant has submitted evidence showing the disputed domain name was used for impersonation of an employee of the Complainant Lennar Corporation specifically by sending fraudulent emails to attempt to obtain goods.

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 has registered and used the disputed domain name in bad faith under paragraph 4(b) of the Policy. 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 (see WIPO Overview 3.1, section 3.2.1).

Panels have held that the use of a domain name for illegitimate or illegal activity, here, claimed impersonation of an employee of Complainant, and the Complainant has submitted evidence that this was done in attempt to obtain orders of goods for shipment and constitutes bad faith (see WIPO Overview 3.1, section 3.4). Evidence submitted by Complainant shows that the disputed domain resolves to a "This site can't be reached" message and that an email address associated with the disputed domain name […]@lennarbiz.com was used by the Respondent to send emails about obtaining an order of mattresses purported to be an order from an employee of the Complainant. The Respondent also did not respond to the Complaint, further indicating bad faith (*see Lonza Ltd v. Geral Gera, SEGLINK,* WIPO Case No. D2025-1342). Additionally, the Respondent used a privacy service, which by itself does not automatically equate to bad faith, but appears to have been used to remain anonymous to engage in impersonation, another indicator of bad faith (see WIPO Overview 3.1, section 3.6).

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitute bad faith under 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 <lennarbiz.com> be transferred to the Complainant Lennar Corporation as requested**.**

/Raj Sachdev/
Raj Sachdev
Sole Panelist
Date: July 30, 2026