

ADMINISTRATIVE PANEL DECISION

DFL Deutsche Fußball Liga GmbH v. Thomas Kline
Case No. D2026-2742

1. The Parties

The Complainant is DFL Deutsche Fußball Liga GmbH, Germany, represented by Arnecke Sibeth Dabelstein PartGmbH, Germany.

The Respondent is Thomas Kline, Belize.

2. The Domain Name and Registrar

The disputed domain name <bundesliga.org> is registered with NameSilo, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 24, 2026. On June 24, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 24, 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 (Privacy User #79ca6cf9) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 25, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. On June 30, 2026, the Complainant filed an amended Complaint.

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 July 3, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 23, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 24, 2026.

The Center appointed Andrew D. S. Lothian, David H. Bernstein and Wilson Pinheiro Jabur as panelists in this matter on August 6, 2026. The Panel finds that it was properly constituted. Each member of 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

According to the Complaint, the Complainant is DFL Deutsche Fußball Liga GmbH (“DFL”), a German limited liability company, that is a wholly owned operating subsidiary of DFL Deutsche Fußball Liga e.V. (“DFL e.V.”), which is the association of all 36 professional football clubs of the Bundesliga and 2. Bundesliga. The DFL e.V. holds all commercial rights to the Bundesliga pursuant to a foundational agreement with the Deutscher Fußball-Bund e.V. (DFB) and has delegated its entire operative business to the Complainant, including match operations, club licensing, and the marketing and sale of all media and commercial rights.

The Bundesliga was founded in 1963 as Germany’s premier professional football league. The Complainant was incorporated on December 18, 2000, and has been exclusively responsible, since July 1, 2001, for all commercial activities associated with the designation “Bundesliga”, including the operation of the official websites “www.bundesliga.de” (associated domain name registered on October 19, 1995) and “www.bundesliga.com” (associated domain name registered on March 12, 1996).

The Complainant asserts various rights in the mark BUNDESLIGA. For example, the Complainant is the owner of the following registered trademarks:

- German Registered Trademark Number 30213991 for the word/figurative mark BUNDESLIGA and device, registered on August 6, 2002, in Classes 9, 16, 25, 28, 35, 36, 38, 41, and 45, duly renewed. The device consists of a red rectangle with curved corners, overlaid with a white image of a man kicking a ball, beneath which is the text BUNDES in smaller point type, beneath which is the text LIGA in larger point type, so that it matches the width of the upper text (each textual item capitalized as such).
- German Registered Trademark Number 30213992 for the word/figurative mark BUNDESLIGA and device, registered on July 30, 2002, in Classes 9, 16, 25, 28, 35, 36, 38, 41, and 45, duly renewed. The device is identical to that in the preceding mark, except that the rectangle is in black, and the textual elements are identical.

The Complainant’s parent company, DFL e.V., is the owner of the following registered trademarks:

- European Union Registered Trademark Number 2843837 for the figurative mark BUNDESLIGA and device, registered on January 3, 2002, in Classes 9, 16, 25, 28, 35, 36, 38, 41, and 45, duly renewed. The device and textual elements are identical to that in the preceding mark.
- German Registered Trademark Number 302019011837 for the word mark BUNDESLIGA, registered on May 27, 2021, in Class 41.
- International Registered Trademark Number 1663476 for the word mark BUNDESLIGA, registered on April 1, 2022, in Class 41, the designation status of which shows grants of protection in respect of Italy, Jersey, Spain, and the United Kingdom.

The Complainant also claims unregistered trademark rights in respect of the mark BUNDESLIGA. In support of said claim, it states that the Complainant and its predecessors have operated and marketed Germany’s premier professional football league under the said mark continuously since 1963. The Complainant also says that it has actively used the said mark in commerce through its official domain names <bundesliga.de> and <bundesliga.com>. The Complainant further asserts that its email address “[...]@bundesliga.de” and its

Internet presence “www.bundesliga.de” have been in continuous use since at least 2003, as evidenced by the DFL’s own press releases from that period.

The Complainant produces press releases dating from 2003, 2004 and 2005 indicating that in the 2001/2002 season, the Bundesliga generated total revenues of EUR 1.043 billion, ranking it among the three largest professional football leagues in Europe, and that it had the highest sponsorship revenues in Europe at EUR 270 million. In the 2003/2004 season, the Complainant’s release reports that the Bundesliga set a new all-time attendance record with over 10 million spectators and an average attendance of 35,048 spectators per match. The said release notes that the attendance figures were published in full at “www.bundesliga.de”.

The Complainant’s press release of December 21, 2005 notes that it had secured audiovisual rights revenues of just under EUR 420 million per season for the period to 2009. The said press release indicates that international broadcasting rights were allocated across six media partners, including dedicated international broadcasting rights granted for foreign markets, demonstrating that the designation “Bundesliga” was not only a household name in Germany but was already being actively marketed to international audiences. Online rights were also granted. The Complainant asserts that these contemporaneous documents establish that by November 2006, the BUNDESLIGA mark had achieved the status of a globally recognized source identifier for the Complainant’s professional football operations.

The Complainant also produces extracts from the Internet Archive “Wayback Machine” in respect of the use of its <bundesliga.com> and <bundesliga.de> domain names showing that these were associated with active websites as early as April 6, 1997 and May 10, 2000 respectively. In the case of <bundesliga.de>, an entry dated November 26, 2005 shows a website featuring what appears to be very rich content for the period in the development of the Internet, and likewise, in the case of <bundesliga.com>, an entry from June 15, 2006, shows the latest Bundesliga information and other football news.

The Complainant produces representative consumer surveys conducted by TNS Infratest (November 2014) and KANTAR TNS (April 2017) in respect of approximately 2,000 respondents representative of the German population aged 14 and above which demonstrated that 99% of the general German population and 100% of football-interested persons associate the term “Bundesliga”, used in isolation, exclusively with the Complainant’s professional football league, and 73% of the population regarded the Bundesliga as a firm component of German society and a significant economic factor. The Complainant asserts that while these surveys postdate the registration of the disputed domain name, recognition levels of 99–100% necessarily reflect decades of accumulated goodwill and it maintains that they conclusively establish current rights and, read together with the pre-2006 evidence, demonstrate a continuous chain of distinctiveness from well before the registration of the disputed domain to the present.

The Complainant notes that it may be suggested that “Bundesliga” is a merely descriptive term in the German language (literally: “federal league”) and therefore incapable of functioning as a trademark. The Complainant points to the evidence referred to above in support of its claimed unregistered mark in the term “Bundesliga” as demonstrating that the term has in fact acquired a secondary meaning as a distinctive sign. Further it notes that this matter has already been considered by the German courts. On August 31, 2006 the *Landgericht Hamburg* reached the conclusion that “Bundesliga” constituted “a name-like sign capable of distinguishing the Complainant’s undertaking or business operations”. In proceedings in 2021 and 2022 concerning “bundesliga2.de”, the *Landgericht Düsseldorf* and the *Oberlandesgericht Düsseldorf* both held that, while the designation “Bundesliga” lacked inherent distinctiveness, it had acquired overwhelming distinctiveness as a business designation for the Complainant’s football operations.

The disputed domain name was registered on November 2, 2006. Little is known about the Respondent other than that it appears to be a private individual based in Belize. Since registration, according to the available evidence, the disputed domain name has resolved either to a blank page, a parking page or to a page offering it for sale. It currently resolves to a free parking page provided by the Registrar.

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 asserts rights in the designation "Bundesliga" based on the trademarks set out in the factual background above. Overall, the Complainant states that it owns 35 active trademarks in more than 65 jurisdictions containing the word element BUNDESLIGA. The Complainant notes that its German word mark number DE 302019011837 was registered on May 27, 2021, and thus postdates the disputed domain name (registered November 2, 2006), but submits that this does not affect the Complainant's standing as said trademark rights were in existence at the time the Complaint was filed.

With respect to the marks registered in the name of DFL e.V., the Complainant contends that a trademark owner's affiliate such as a subsidiary is considered to have rights in a trademark under the Policy for the purposes of standing. The Complainant states that it is the wholly-owned operating subsidiary of DFL e.V., which has delegated its entire operative business, including the exclusive commercial exploitation of the designation "Bundesliga", to the Complainant. The Complainant asserts therefore that it has standing to assert the DFL e.V.'s registered marks in this proceeding. The Complainant further submits that its authority to assert the trademark rights of DFL e.V. in its own name against third parties derives expressly from Section 7 sentence 2 of the German Regulations on the Exploitation of Commercial Rights (OVR) pursuant to which DFL is authorized to enforce relevant trademarks and commercial designations (Sections 15 and 16 OVR).

The Complainant contends that assessment of identity or confusing similarity involves comparing the disputed domain name and the textual components of the relevant mark, and that design or figurative elements are largely disregarded for purposes of this assessment. It submits that the textual element "BUNDESLIGA" constitutes the dominant and independently recognizable core of each of its marks and is therefore sufficient to establish standing and confusing similarity.

The Complainant contends further that the BUNDESLIGA mark had already acquired overwhelming distinctiveness well before 2006. It notes that, with respect to bad faith, only in exceptional cases can bad faith be proven where a domain name predates a trademark registration and contends that the present case constitutes such an exceptional case given the worldwide fame of the BUNDESLIGA mark at the time of registration of the disputed domain name. In this respect, the Complainant relies upon its extensive unregistered rights in the BUNDESLIGA mark which it submits has acquired overwhelming distinctiveness and secondary meaning as a source identifier for the DFL's professional football league operations. The Complainant asserts that said unregistered rights are demonstrated first by the duration of its use of the mark, noting that the DFL and its predecessors have operated and marketed Germany's premier professional football league under the mark continuously since 1963. Further, it states that it has actively used the mark in commerce through its official Internet domain names <bundesliga.de> (registered since October 19, 1995) and <bundesliga.com> (registered since March 12, 1996).

Second, the Complainant submits that the economic significance of the Bundesliga was already firmly established well before the disputed domain name was registered. The Complainant submits that the information contained in its various press releases demonstrate that, before registration of the disputed domain name, the designation "Bundesliga" was already associated with its significant EUR multi-billion sports entertainment enterprise.

Third, the Complainant contends that the level of public attendance at its matches, the extent of its economic activity, international broadcasting and its longstanding official Internet presence result in exceptional consumer recognition of BUNDESLIGA as a globally recognized source identifier for the Complainant's professional football operations. The Complainant notes that the level of consumer recognition is confirmed by the independent consumer surveys carried out on its behalf.

The Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. In particular, it contends that there is no evidence that the Respondent has been commonly known by the disputed domain name, that the Respondent has not acquired any trademark or service mark rights in the term and that it is not affiliated with, licensed, or otherwise authorized by the Complainant to use the BUNDESLIGA mark.

The Complainant further contends that the Respondent has never used the disputed domain name in connection with a bona fide offering of goods or services. The disputed domain name has either resolved to a blank page, a parking page, or has been offered for sale. There is no evidence of any demonstrable preparations to use the disputed domain name in connection with a legitimate business purpose. Further, the Respondent is not making a legitimate noncommercial or fair use of the domain name, such as a fan site, and the documented offers to sell the disputed domain name for USD 799 (July 2016), USD 4,988 (August 2022) and USD 3,911 (August 2024) are inconsistent with any legitimate noncommercial use.

The Complainant contends that the Respondent could not claim to have registered the disputed domain name for its generic or descriptive meaning as the fame of the BUNDESLIGA mark renders implausible any suggestion that the Respondent registered the domain name for such purpose rather than to exploit the Complainant's goodwill.

The Complainant contends that the Respondent's nearly two decades of passive holding, combined with the documented sale offers, affirmatively demonstrate a lack of rights or legitimate interests. There is no credible scenario in which the Respondent's registration and passive holding of an exact-match domain name corresponding to a world famous sports league could constitute a bona fide activity.

The Complainant accordingly asserts that it has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name and in the absence of any response or evidence to the contrary, that the second element of the Policy is satisfied.

The Complainant submits that the Respondent registered and is using the disputed domain name in bad faith. In particular, the Complainant contends that by the date of registration of the disputed domain name, the BUNDESLIGA mark had been in use for over 40 years, had generated revenues in excess of EUR 1 billion per season, had attracted more than 10 million spectators per season, and was broadcast globally. The Complainant adds that the overwhelming fame and acquired distinctiveness of such mark establishes that the Respondent acted in bad faith when registering the disputed domain name. The only discernible purpose was to offer it to the Complainant as the sole conceivable interested party, since the Complainant is the only entity entitled to use the mark in isolation. The Complainant contends that where a domain name is identical to a highly distinctive or famous mark, panels have tended to view with a degree of skepticism a respondent defense that the domain name was merely registered for legitimate speculation. Given the worldwide fame of the BUNDESLIGA mark, it is inconceivable that the Respondent was unaware of the Complainant's rights at the time of registration. Registration in bad faith is therefore established.

Further, the Complainant contends that paragraph 2 of the Policy requires every domain name registrant to represent and warrant that the registration of the domain name will not infringe upon the rights of any third party. By registering and repeatedly renewing the disputed domain name over a period of nearly 20 years, the Respondent has made this representation while manifestly failing to discharge the accompanying duty of inquiry. The Complainant asserts that the Respondent's failure to undertake even a basic trademark search constitutes willful blindness.

The Complainant further contends that the disputed domain name has been used in bad faith. In particular, the Respondent has offered the disputed domain name for sale via a publicly accessible parking/sales page at prices of USD 799, USD 4,988 and USD 3,911, which the Complainant submits are sums clearly in excess of any out-of-pocket costs directly related thereto.

The Complainant contends that the Respondent has maintained the disputed domain name in a state of passive holding for nearly 20 years without any legitimate use. In support of this contention, the Complainant notes that (i) the BUNDESLIGA mark is one of the most famous sports brands in the world; (ii) the Respondent has not put the disputed domain name to any legitimate use in nearly 20 years; (iii) the Respondent concealed its identity through the use of a privacy/proxy service; and (iv) the implausibility of any good faith use to which the domain name may be put.

The Complainant acknowledges that the disputed domain name was registered in 2006 and that the Complaint was filed approximately 20 years later. However, the Complainant submits that panels under the Policy have noted that the UDRP remedy is injunctive rather than compensatory, and that a principal concern is to halt ongoing or avoid future abuse or damage. The Complainant adds that such panels have further noted that trademark owners cannot reasonably be expected to permanently monitor for every instance of potential trademark abuse and have declined to adopt concepts such as laches in UDRP cases. The Complainant asserts that the Respondent cannot claim detrimental reliance as the disputed domain name has been passively held throughout, and the documented sale offers confirm the Respondent's continued intent to profit from the Complainant's mark.

The Complainant notes that the Respondent might argue that "Bundesliga" is a generic or descriptive term, but submits that there is no evidence of any legitimate use corresponding to the dictionary meaning of "Bundesliga". The sole documented activity is offering the disputed domain name for sale and thereby targeting the trademark owner.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, in order to succeed, a complainant must establish each of the following elements:

- (i) the disputed domain name is identical or confusingly similar to the 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 has been 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 identical to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The applicable TLD in a domain name (e.g., “.com”, “.club”, “.nyc”) (here, “.org”) is viewed as a standard registration requirement and as such may be disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

Any of the marks noted in the factual background section above would have been sufficient on their own to provide standing under the Policy. The textual element of the Complainant’s figurative/word marks may be severed from the graphical components, leaving the word “BUNDESLIGA” for the comparison exercise. [WIPO Overview 3.1](#), section 1.10.

A trademark owner’s affiliate such as, here, DFL (being a subsidiary of the parent DFL e.V.) is considered to have rights in a trademark under the UDRP for purposes of standing to file a complaint. [WIPO Overview 3.1](#), section 1.4.1. Consequently, the Complainant has UDRP-relevant rights in the registered trademarks of DFL e.V. outlined in the factual background section above for the purposes of the first element assessment, including for the word mark BUNDESLIGA.

The Panel notes that the disputed domain name was registered on November 2, 2006, that is, several years after the registration of the Complainant’s own German registered trademarks (numbers 30213991 and 30213992 respectively) both registered in 2002. This is accordingly not a case in which the relevant trademark rights postdate the disputed domain name, and the “exceptional case” standard the Complainant puts forward need not be addressed in this administrative proceeding. Accordingly, the Panel does not consider it necessary to determine whether the Complainant had also established unregistered trademark rights in BUNDESLIGA as of November 2006, nor does the Complainant necessarily need to rely upon any registered marks which postdate the disputed domain name. This applies equally to the question of standing under this first element (where the issue of whether the relied-upon marks predate or post-date the disputed domain name is not relevant) and to the bad faith assessment under the third element below.

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.

In particular, the Panel notes the following. First, there is no evidence of the Respondent's use of, or preparations to use, the disputed domain name in connection with a bona fide offering of goods and services. On the contrary, the only use of the disputed domain name has been to list it for sale repeatedly, at the reported prices of USD 799 in 2016, USD 4,988 in 2022 and USD 3,911 in 2024. There is no evidence of any use of the disputed domain name corresponding to its potential descriptive meaning of "federal league". Given the Complainant's uncontested evidence of the fame of the BUNDESLIGA mark, the Panel would in any event have viewed any such claimed descriptive use with skepticism.

Secondly, there is no evidence that the Respondent is or has been commonly known as "Bundesliga", for example, based upon the registration records for the disputed domain name.

Thirdly, there is no evidence that the Respondent has been making a legitimate noncommercial or fair use of the disputed domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue. In particular, the fact that the disputed domain name has been offered for sale as described above indicates a motivation for commercial gain on the Respondent's part. There is likewise no evidence that the disputed domain name was intended for, or has ever been associated with, a (noncommercial) fan, informational, or criticism website.

The Respondent has not engaged with the administrative proceeding and has provided no submissions or evidence which might have suggested that it had any claim to rights or legitimate interests in the disputed domain name. In the absence of such, and having particular regard to paragraph 4(c) of the Policy, the Panel has not been able to identify any potential rights and legitimate interests that the Respondent might have attempted to claim had it chosen to participate in this matter.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

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.

As indicated in the first element assessment, several of the Complainant's registered trademarks for BUNDESLIGA pre-date the registration of the disputed domain name by several years. The disputed domain name is an exact match to the textual components of said marks. The evidence also indicates that the designation was prominently used by the Complainant on active and content-rich websites associated with the Complainant's professional football league, which were accessible internationally (via their exact-match domain names <bundesliga.com> and <bundesliga.de>), well before the registration of the disputed domain name. Furthermore, the Complainant's various press releases predating the registration of the disputed domain name provide support for the proposition that the mark BUNDESLIGA was already very well-known in its field. This was not least because of the wide dissemination of the various football matches in the Bundesliga via both traditional media and online, as also evidenced by the various broadcasting deals and the reported extent of the sponsorship revenues raised. These demonstrate that the designation had garnered substantial commercial recognition and value prior to the registration of the disputed domain name, and had become closely associated in the minds of consumers with the Complainant's professional football league and related activities. On the balance of probabilities, therefore, the disputed domain name was registered in the knowledge of the Complainant and its BUNDESLIGA mark.

The disputed domain name appears to have been offered for sale at times, and at others passively held. Taking the offers of sale first, as noted in the preceding section, particularly where the domain name at issue is identical or confusingly similar to a highly distinctive or famous mark, panels have tended to view with a degree of skepticism a respondent defense that the domain name was merely registered for legitimate speculation (based for example on any claimed dictionary meaning) as opposed to targeting a specific brand owner. [WIPO Overview 3.1](#), 3.1.1. Here, although there is a potential descriptive meaning of the term in the disputed domain name, namely, “federal league”, the Panel finds that the Complainant’s use of the term had led it to become a well-known mark associated with the eponymous German professional football league before 2006, whereby an argument that the disputed domain name was registered for legitimate speculation based upon a claimed descriptive meaning would have been unlikely to be particularly credible. It seems more probable to the Panel that the various attempted sales of the disputed domain name were intended to target the Complainant as the specific brand owner. In any event, no argument as to legitimate speculation has been tendered here, and there is no evidence that, despite having been registered for almost 20 years, the disputed domain name has ever been used in a manner that relates to any such descriptive meaning.

With regard to the current (non-)use of the disputed domain name, panels have found that the non-use of a domain name (including a blank or “coming soon” page) would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the reputation of the Complainant’s trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

The Respondent’s default does not by itself mean that the Complainant is deemed to have prevailed; a respondent’s default is not necessarily an admission that the complainant’s contentions are accurate. Further to paragraph 14(b) of the Rules however, panels have been prepared to draw certain inferences in light of the particular facts and circumstances of the case e.g., where a particular conclusion is prima facie obvious, where an explanation by the respondent is called for but is not forthcoming, or where no other plausible conclusion is apparent. [WIPO Overview 3.1](#), section 4.3. Here, due to the fame and reputation of the Complainant’s BUNDESLIGA mark, pre-dating the registration of the disputed domain name, the fact that the disputed domain name features an exact match to said mark, and the fact that the disputed domain name has either been passively held or offered for sale, the Panel considers that the Complainant’s submissions and evidence raise a case for the Respondent to answer. As it has chosen not to engage with the administrative proceeding, the Panel makes the reasonable inference that the Respondent has no plausible explanation for selecting the disputed domain name. In the absence of such, and in the circumstances of this case, the Panel has not identified any reasonable basis upon which the Respondent might have satisfied the Panel that it registered and has been using the disputed domain name in good faith.

The Panel notes that the disputed domain name was registered almost 20 years ago. However, as the Complaint notes, mere delay between the registration of a domain name and the filing of a complaint neither bars a complainant from filing such case, nor from potentially prevailing on the merits. [WIPO Overview 3.1](#), section 4.17. There is no evidence before the Panel suggesting that the Respondent has made any detrimental reliance upon the Complainant’s delay in bringing the present administrative proceeding.

Finally, the Panel adds for completeness that although the Complainant asserts that the Respondent's concealment of its identity through the use of a privacy/proxy service is itself suggestive of bad faith, this submission overlooks the fact that the use of such a service is virtually a default setting for many domain name registrars. Such masking of the Respondent's details in RDAP data by its Registrar is not unusual in the post-GDPR¹ environment. The Panel notes in particular that the Respondent's details were not concealed in the underlying registrant data, as verified by the Registrar following the filing of the Complaint.

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 <bundesliga.org> be transferred to the Complainant.

/Andrew D. S. Lothian/

Andrew D. S. Lothian

Presiding Panelist

/David H. Bernstein/

David H. Bernstein

Panelist

/Wilson Pinheiro Jabur/

Wilson Pinheiro Jabur

Panelist

Date: August 12, 2026

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), commonly abbreviated as "GDPR".