

ADMINISTRATIVE PANEL DECISION

HeyGen Technology Inc v. jack, lingling zhang
Case No. D2026-2831

1. The Parties

The Complainant is HeyGen Technology Inc, United States of America ("United States"), represented by Coates IP LLP, United States.

The Respondents are jack, Hong Kong, China, and lingling zhang, Hong Kong, China.

2. The Domain Names and Registrar

The disputed domain names <heygen.bet>, <heygen.pro>, and <heygen.win> are registered with Dynadot Inc (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 29, 2026. On June 30, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 1, 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 (Dynadot Privacy Service, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint.

The Center sent an email communication to the Complainant on July 6, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on July 17, 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 July 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 12, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on August 13, 2026.

The Center appointed Ganna Prokhorova as the sole panelist in this matter on August 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 founded in 2020 is a leading company in video and image generation in artificial intelligence. The Complainant allows for users to create photo realistic video avatars using the likeness of real people or a library of pre-made avatars and voices. As of 2024, the Complainant reached 40,000 customers worldwide, and its annual revenue stood at USD 35 million.

The Complainant is the owner of numerous trademark registrations incorporating the mark HEYGEN, including, inter alia:

- United States trademark registration HEYGEN (word), No. 7725074, registered on March 11, 2025, in class 42;
- United Kingdom trademark registration HEYGEN (word), No. UK00003940036, registered on October 27, 2023, in classes 9 and 42; and
- Canadian trademark registration HEYGEN (word), No. TMA1352040, registered on October 3, 2025, in classes 9 and 42.

The Complainant since 2023 has also operated the domain name <heygen.com> registered in 2015.

The disputed domain names are: <heygen.bet>, registered on April 25, 2026, <heygen.pro>, registered on April 28, 2026, and <heygen.win>, registered on May 11, 2026. At the time of filing of the Complaint, the disputed domain names resolved to websites presenting themselves as online gaming, betting, and casino platforms directed primarily at users in Bangladesh. The websites prominently displayed the HEYGEN mark and contained registration and login functions. Additionally, all three websites, to which the disputed domain names resolve, featured copyright notice "© 2026 heygen. All rights reserved" or "© 2025 heygen. All rights reserved".

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:

- (1) the disputed domain names are identical to the Complainant's trademark, since they incorporate the HEYGEN mark in its entirety. The generic Top-Level Domain (gTLD) ".pro", ".bet", and ".win" do not prevent the likelihood of confusion between the disputed domain names and the Complainant and its trademark;

(2) the Respondents have no rights or legitimate interests in respect of the disputed domain names. The Respondents are not affiliated with the Complainant, have no license or authorization to use the HEYGEN mark, and are not commonly known by “Heygen”. The disputed domain names resolve to websites prominently displaying the Complainant’s logos that imitate the colors, symbols, and overall look and feel associated with the Complainant’s branding, as well as in copyright notices identifying “Heygen” as the purported rights holder. The websites also seek to collect users’ personally identifiable information and HEYGEN account credentials by prompting users to enter their “heygen account” email address and password. Such use does not constitute a bona fide offering of goods or services and negates any claim to rights or legitimate interests. The disputed domain names not only overtly allege to provide online gambling and betting services, they specifically target users located in Bangladesh, where similar actions are punishable pursuant to Bangladesh’s Cyber Security Ordinance of 2025 and Cyber Security Act of 2026; and

(3) the disputed domain names were registered and are being used in bad faith. The disputed domain names were registered in April and May 2026. Registering the disputed domain names so obviously connected to a well-known mark without authorization is itself evidence of bad faith. By using the disputed domain names for websites prominently displaying the HEYGEN mark and promoting online gambling and betting services targeting users, the Respondents have intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant’s trademark. The activities promoted on the websites also appear to be prohibited under Bangladeshi law, and the use of domain names in connection with illegal activity further supports a finding of bad faith. In addition, the websites prompt users to provide personal information and purported HEYGEN account credentials, including email addresses and passwords, which constitutes further evidence of bad-faith use.

The Complainant asks that the disputed domain names be transferred.

B. Respondents

The Respondents did not reply to the Complainant’s contentions.

6. Discussion and Findings

6.1. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant’s request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant’s request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.11.2.

As regards common control, the Panel notes that the disputed domain names:

(a) follow a similar naming structure incorporating the Complainant’s HEYGEN trademark in its entirety, differing only in their respective gTLDs (“[.pro](#)”, “[.bet](#)”, and “[.win](#)”);

(b) resolve to similar websites displaying the Complainant's trademark and presenting themselves as online gaming, betting, and casino platforms; and

(c) target the same market (Bangladesh);

(d) were registered within a narrow period of approximately 16 days, between April 25, 2026 and May 11, 2026, and were registered through the same registrar (Dynadot), and use the same hosting provider (Cloudflare);

(e) have similarities in the registrants' location (Hong Kong, China).

The Center has discharged its duties to notify the persons listed as registrants of the disputed domain names of the present Complaint, who have not objected to the consolidation request of the Complainant or to its arguments in support of the request.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

6.2. Substantive Issues

Paragraph 15(a) of the Rules provides that the Panel is to decide the Complaint on the basis of the statements and documents submitted in accordance with the Policy, the Rules, and any rules and principles of law that it deems applicable.

The onus is on the Complainant to make out its case and it is apparent, both from the terms of the Policy and the decisions of past UDRP panels, that the Complainant must show that all three elements set out in paragraph 4(a) of the Policy have been established before any order can be made to transfer the disputed domain name. In UDRP cases, the standard of proof is the balance of probabilities.

To succeed in a UDRP complaint, the Complainant has to demonstrate that all the elements listed in paragraph 4(a) of the Policy have been satisfied, namely:

(i) the disputed domain names are 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 in respect of the disputed domain names; and

(iii) the disputed domain names have been registered and are being used in bad faith.

The Respondent was given proper notice of the Complaint and had the opportunity to respond. Under paragraph 5(a) of the Rules, the Respondent was required to submit its response within 20 days of commencement of the proceeding. The Respondent failed to do so.

Pursuant to paragraph 5(f) of the Rules, in the event of such a default, the Panel shall proceed to a decision based on the Complaint. However, the Respondent's default does not mean that the Complainant automatically prevails; the Complainant continues to bear the burden of proof on each element. The Panel may draw appropriate inferences from the Respondent's silence, and, where appropriate, accept as true the reasonable allegations in the Complaint that are not contradicted by evidence.

The Panel has reviewed the entire case file and the evidence provided. The Panel is also guided, where pertinent, by the [WIPO Overview 3.1](#), which reflects consensus positions of UDRP panels on many common issues. The Panel will make reference to these consensus views in the analysis below as 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 mark and the disputed domain name. [WIPO Overview 3.1](#), section 1.7.

Based on the evidence submitted by the Complainant, the Panel finds that the Complainant has shown rights in respect of its HEYGEN mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds that the Complainant's mark is recognizable within the disputed domain names. The disputed domain names incorporate the Complainant's HEYGEN mark in its entirety, without any additional elements or alterations.

The Panel further notes that the gTLDs ".pro", ".bet", and ".win" are required only for technical reasons and are generally disregarded for the purposes of comparison of the Complainant's mark to the disputed domain names. [WIPO Overview 3.1](#), section 1.11.1.

Accordingly, the Panel concludes that the disputed domain names are identical to the Complainant's mark and that the first element of paragraph 4(a) of the Policy is satisfied.

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 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 record, the Panel finds that the Complainant has made a prima facie showing that the Respondent lacks rights or legitimate interests in the disputed domain names. The Respondent has not filed a Response and therefore has not rebutted the Complainant's case or provided any evidence demonstrating rights or legitimate interests under the Policy or otherwise.

The evidence shows that the Respondent is not making any bona fide offering of goods or services through the disputed domain names, but rather to operate websites that use the Complainant's HEYGEN mark to attract Internet users to online gaming, betting, and casino-related websites targeting users in Bangladesh, while prompting users to register or log in and provide personal information and account credentials. Nor does such use constitute a legitimate noncommercial or fair use, as it is plainly commercial and seeks to capitalize on the goodwill associated with the Complainant's mark. Accordingly, such use demonstrates that the Respondent lacks any rights or legitimate interests in the disputed domain names.

The Panel further notes that the Complainant has established trademark rights in HEYGEN mark and has confirmed that it has no relationship with the Respondent. The Respondent has not been authorized, licensed, or otherwise permitted to use the Complainant's trademark. Furthermore, there is nothing in the record to suggest that the Respondent is commonly known by the disputed domain names or any corresponding name.

The Panel notes that such use is not supported by any authorization from the Complainant and creates a risk of implied affiliation.

In light of the Respondent's failure to participate in the proceedings, the absence of any credible evidence of rights or legitimate interests, and the clear intent to capitalize on the goodwill of the Complainant's trademark, the Panel concludes that the Respondent has no rights or legitimate interests in the disputed domain names.

Accordingly, the Complainant has satisfied the requirement of paragraph 4(a)(ii) of the Policy.

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 finds that the Respondent both registered and is using the disputed domain names in bad faith under paragraph 4(b) of the Policy.

The Complainant operates globally under the distinctive HEYGEN trademark. The Complainant is a globally recognized company engaged in artificial intelligence-powered video and image generation, specializing in the creation of photorealistic digital avatars capable of delivering content in 175 languages.

Given the international reputation of the Complainant and the coined nature of the HEYGEN trademark, the Panel finds it implausible that the Respondent was unaware of the Complainant's rights at the time of registration of the disputed domain names. The disputed domain names incorporate the HEYGEN trademark in its entirety, merely adding the gTLD ".pro", ".bet", and ".win", and create identical variations. Under [WIPO Overview 3.1](#), section 3.2.1, these compositions strongly suggest deliberate targeting.

By registering the disputed domain names that wholly incorporate the Complainant's well-known HEYGEN trademark and using them for websites that prominently display the HEYGEN mark, promote online gambling and betting services targeting users in Bangladesh, and include copyright notices issued in the HEYGEN name, the Respondent has created a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the disputed domain names. The websites also prompt users to provide personal information and purported HEYGEN account credentials, including email addresses and passwords. Such use constitutes an intentional attempt to exploit the goodwill associated with the Complainant's trademark for commercial gain.

The Respondent has provided no explanation for its choice of the disputed domain names, is not commonly known by the disputed domain names, and has not been authorized by the Complainant to use its trademark. The absence of any Response further reinforces the Panel's inference of bad faith. [WIPO Overview 3.1](#), section 4.3

The Panel further notes that the Respondent has made use of a privacy or proxy service to register the disputed domain names. In the circumstances of the present case it supports an inference that the Respondent sought to conceal its identity. This is considered by the Panel as an additional indicium of bad faith. [WIPO Overview 3.1](#), section 3.6.

Having regard to the totality of the circumstances, the Panel concludes that the disputed domain names were registered and are being used in bad faith within the meaning of paragraphs 4(a)(iii) and 4(b)(iv) of the Policy. Accordingly, the third element of the Policy has been established.

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 <heygen.bet>, <heygen.pro>, and <heygen.win> be transferred to the Complainant.

/Ganna Prokhorova/

Ganna Prokhorova

Sole Panelist

Date: August 28, 2026