

ADMINISTRATIVE Panel DECISION

Cyber Gravity, LLC v. DANYUN WANG

Case No. DIO2026-0019

1. The Parties

Complainant is Cyber Gravity, LLC, United States of America (United States), represented Jafari Law Group, United States.

Respondents are Danyun Wang, FinalRound, Inc., and Minghao Guan, all of the United States.

2. The Domain Name and Registrar

The Disputed Domain Name <lockedinai.io> (hereinafter “Disputed Domain Name”) is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 25, 2026. On April 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On April 27, 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 Respondents and contact information in the Complaint (FINALROUND INC. and MINGHAO GUAN). The Center sent an email communication to Complainant on April 28, 2026, providing the registrant and contact information disclosed by the Registrar, and requesting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on April 30, 2026. The Center requested a further amendment to Complainant on May 6, 2026. Complainant sent an amended Complaint on the same day.

The Center verified that the Complaint together with the amended Complaints satisfied the formal requirements of the .IO Domain Name Dispute Resolution Policy (the “.IO Policy”), the Rules for .IO Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for .IO Domain Name Dispute Resolution Policy (the “Supplemental Rules”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified Respondents of the Complaint, and the proceedings commenced on May 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 27, 2026. Respondents did not submit any response. Accordingly, the Center notified Respondents’ default on May 28, 2026.

The Center appointed Lawrence K. Nodine as the sole panelist in this matter on June 11, 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

Complainant is a Delaware limited liability company that offers a software as a service (SAAS) platform that helps users prepare for interviews by, for example, pre-interview screenings, meeting preparations, or resume building. Complainant began using LOCKEDIN AI (hereinafter the “Mark”) in April 2024 and subsequently secured United States Trademark Registration No. 7,917,908 (registered August 26, 2025) based on an application filed on December 6, 2024. Complainant promotes its service on the website associated with its <lockedinai.com>.

The Disputed Domain Name was registered June 20, 2024. In the preceding two weeks, Respondents also registered several other domain names using the term “lockedinai” in different Top-Level Domains (“TLD”), including <lockedinai.co>, <lockedinai.xyz>, <lockedinai.info>, <lockedinai.store>, and <lockedinai.org>. Complainant represents that a separate UDRP proceeding has been initiated with respect to these additional domain names.

Respondents use the trademark FINAL ROUND in connection with services similar to those offered by Complainant, including facilitating practice with AI mock interviews. Respondents promote their services on the domain name <finalroundai.com>.

The Disputed Domain Name does not currently resolve to an active website, although, as further detailed in the contentions section below, Complainant offers evidence that Respondents previously redirected the Disputed Domain Name to <finalroundai.com> where Respondents offer services that compete with Complainant.

The Disputed Domain Name is currently offered for sale for USD 15,000. ¹

The Parties are engaged in litigation pending in the California federal court. ² Complainant represents that “although the Federal Action involves trademark infringement claims against Complainant, those claims are based on another Mark (i.e., the INTERVIEW COPILOT mark), which is not the subject of this .IO POLICY dispute and has no bearing on this .IO POLICY dispute.”

5. Respondent Identity

The original Complaint named as Respondents FinalRound, Inc., a Delaware corporation formerly known as Pump Labs, Inc. and Minghao Guan, the CEO of FinalRound, Inc. After the Center notified Complainant that the Registrar identified Danyun Wang as the registrant of the Disputed Domain Name, Complainant amended its complaint to add him as a Respondent and requested that the Panel consolidate the claim against Danyun Wang with the prior asserted claim against Respondents named in the original Complaint.

The Center sent digital and written notice to all three Respondents proposed by Complainant, but none responded.

¹Respondents also offer to sell for comparable asking prices the other “lockedinai” domain **names** that it has registered.

²See *Pump Labs, Inc., et al. v. Cyber Gravity LLC, et al.*, Case No. 8:24-cv-01910-JVS-DFM, United States District Court, Central District of California (filed 2024).

Although the alleged beneficial owners FinalRound, Inc. and Minghao Guan, have not acknowledged their interest or responded to the Complaint, there is evidence that they shared control of the registration and use of the Disputed Domain Name:

- Minghao Guan is the CEO and controlling principal of FinalRound, Inc., to which the Disputed Domain Name was redirected.
- Danyun Wang was identified as the President of FinalRound, Inc's predecessor Pump Labs, Inc.
- Even though the Registrar's registrant verification identifies Danyun Wang as the registrant, Minghao Guan's email address is listed as the contact email for Disputed Domain Name.
- Minghao Guan's responses to discovery in the pending litigation Federal Action, admitting purchasing the domain names.

The Panel finds that Minghao Guan, FinalRound, Inc. and Danyun Wang share control of the Disputed Domain Name and that it would be equitable and fair to consider them as Respondents (hereinafter "Respondent").

6. Parties' Contentions

A. Complainant

Complainant contends that:

- the Parties are competitors.
- that for an extended period (fifteen to eighteen months) Respondent redirected the Disputed Domain Name to Respondent's <finalroundai.com> website. Complainant offers evidence to support this contention.
- That Respondent's principles had actual knowledge on Complainant and its rights in the Mark when the Disputed Domain Name was registered and throughout the period when the Disputed Domain Name was redirected to Respondent's website. Supporting evidence includes sworn discovery responses secured in the litigation pending in California, including interrogatory answers admitting that Respondent CEO (Minghao Guan), was aware of Complainant's business as of June 3, 2024, which was prior to June 20, 2024, the date Respondent registered the Disputed Domain Name.
- That within the two-week period prior to its registration of the Disputed Domain Name, Respondent registered six other domain names incorporating Complainant's LOCKEDIN AI Mark in other TLDs (".org", ".info", ".co", ".xyz", and ".store"). Complainant contends this is evidence of bad faith targeting of Complainant and its Mark to cause confusion for commercial gain in violation of the .IO Policy, paragraph 4(b)(iv).

B. Respondent

Respondent did not respond to the Complaint.

7. Discussion and Findings

A. Identical or Confusingly Similar

Complainant has shown rights in respect of a trademark or service mark for the purposes of the .IO Policy. [WIPO Overview 3.1](#), section 1.7. ³

³Given the similarities between the .IO Policy and the Uniform Domain Name Dispute Resolution Policy ("UDRP"), the Panel finds UDRP precedent to be relevant to this case. See *Qorvo US, Inc. v. berhan turkkaynagi, bero*, WIPO Case No. [DIO2025-0044](#) and *LinkedIn Corporation v. DNS Admin, Botflip LLC*, WIPO Case No. [DIO2022-0005](#).

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 .IO Policy. [WIPO Overview 3.1](#), section 1.7.

The Panel finds the first element of the .IO Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the .IO Policy provides a list of circumstances in which Respondent may demonstrate rights or legitimate interests in a Disputed Domain Name.

Although the overall burden of proof in proceedings under the .IO Policy is on 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 respondent. As such, where a complainant makes out a prima facie case that respondent lacks rights or legitimate interests, the burden of production on this element shifts to respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on complainant). If respondent fails to come forward with such relevant evidence, complainant is deemed to have satisfied the second element. [WIPO Overview 3.1](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Disputed Domain Name. Respondent has not rebutted 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 .IO Policy or otherwise.

Complainant’s evidence demonstrates that Respondent redirected the Disputed Domain Name to Respondent’s website, which promotes services that compete with Complainant. “[A] respondent’s use of a complainant’s mark to redirect users (e.g., to a competing site) would not support a claim to rights or legitimate interests.” [WIPO Overview 3.1](#), section 2.5.3.

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

C. Registered or Used in Bad Faith

The .IO Policy requires that Complainant prove by a preponderance of the evidence that the Disputed Domain Name “has been registered or is being used in bad faith.” Notably, the .IO Policy does not require that Complainant prove that the Disputed Domain Name was registered and used in bad faith. Proof of bad faith registration or use is sufficient to carry Complainant’s burden.

The Panel finds that Respondent has used the Disputed Domain Name in bad faith, by redirecting Internet visitors to its competitive website, which is bad faith under .IO Policy paragraph 4(b)(iv). See also [WIPO Overview 3.1](#), section 3.1.3.

The Panel also finds that Respondent registered the Disputed Domain Name in bad faith. Complainant did not apply to register the Mark until December 6, 2024, which was six months after Respondent registered the Disputed Domain Name on June 20, 2024. However, Complainant began using the Mark in April 2024. Although Complainant has not offered evidence quantifying the extent of its use of the Mark before the Disputed Domain Name was registered, Respondent’s representative admitted in discovery answers given in the pending federal litigation that Respondent was aware of Complainant’s use of the Mark to identify its business when it registered the Disputed Domain Name. The Panel finds⁴ that Respondent registered the Disputed Domain Name in anticipation of Complainant’s acquisition of trademark rights. [WIPO Overview](#)

⁴ The Panel does not rule that Complainant did not have common law rights when Respondent registered the Disputed Domain Name, and this decision is with prejudice to Complainant’s right to offer evidence relevant to that point in other proceedings.

[3.1](#), paragraph 3.8.2. This finding is further supported by the offered and un rebutted evidence that Respondent registered several other identical domain names in other TLDs.

8. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the .IO Policy and 15 of the Rules, the Panel orders that the Disputed Domain Name <lockedinai.io> be transferred to Complainant.

/Lawrence K. Nodine/

Lawrence K. Nodine

Sole Panelist

Date: June 26, 2026