

Decision for dispute CAC-UDRP-108834

Case number	CAC-UDRP-108834
Time of filing	2026-07-16 10:10:24
Domain names	nsfwkling.ai

Case administrator

Name	Olga Dvořáková (Case admin)
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Complainants

Organization	Beijing Dajia Internet Information Technology Co. Ltd.
Organization	Beijing Kuaishou Technology Co. Ltd.

Respondent

Name	Vincent Jackson
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OTHER LEGAL PROCEEDINGS

The Panel is not aware of any other legal proceedings which are pending or decided and which relate to the disputed domain name.

IDENTIFICATION OF RIGHTS

The Complainants are the owners of various trademarks KLING or KLING AI and in particular:

- United Kingdom trademark registration No. UK00004072097 for KLING, registered on July 5, 2024;
- US trademark registration No 8,046,148 for KLING AI registered on December 2, 2025;
- US trademark registration No 8,046,149 for KLING AI registered on December 2, 2025;
- EUIPO trademark registration n°019045050, registered on November 28, 2025.

FACTUAL BACKGROUND

The Complainants are two related companies, with Complainant 1 (Beijing Dajia Internet Information Technology Co. Ltd) being an indirect wholly-owned subsidiary of Complainant 2 (Beijing Kuaishou Technology Co. Ltd). The Complainants operate in the field of artificial intelligence and audio-visual technologies.

The Complainants have developed an artificial intelligence product called “KlingAI”, which enables users to generate photos and videos based on textual, visual or audiovisual input. The product has gained significant global recognition and is accessible via the website <klingai.com> as well as through mobile applications.

Complainant 1 is the owner of registered trademarks “KLING” and “KLING AI” in several jurisdictions, including the United Kingdom, the European Union, the United States and Australia.

The disputed domain name <nsfwkling.ai> was registered between September 28, 2025 and resolves to identical or highly similar websites offering paid AI services under the name “Kling AI”.

No information is known about the Respondent who registered the disputed domain names using the privacy protection service.

The Respondent filed a reply to the Complaint challenging the arguments filed in the Complaint.

PARTIES CONTENTIONS

COMPLAINANTS

The Complainants contend that:

The disputed domain name is confusingly similar to the Complainants' trademarks.

The Complainant asserts that the addition of the generic or common acronym "nsfw" is not sufficient to escape the finding that the domain name is confusingly similar to the trademarks KLING and KLING AI.

The Complainant concludes that the disputed domain name is confusingly similar to their KLING and KLING AI trademarks.

The Respondent does not have any rights or legitimate interest in the disputed domain name

The Complainant contends that the Respondent is not commonly known by the disputed domain name and that the Respondent is not affiliated with or authorized by the Complainant in any way.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name, and is not related to the Complainant's business in any way. The Complainant does not carry out any activity for, nor does it have any business dealings with, the Respondent. The Complainant further contends that the disputed domain name was redirecting to a fraudulent website reproducing the Complainant's website, and that this is a typical case of impersonation and undeniable evidence that the Respondent has no rights or legitimate interests in respect of the domain name.

The disputed domain name has been registered and is being used in bad faith

The Complainant contends that the Respondent could not be unaware of the existence of the KLING and KLING AI trademarks at the time of registration of the disputed domain name, not only because KLING and KLING AI are well-known trademarks, but also in consideration of the nature and content of the domain name.

The Complainant contends that the requirements of the Policy have been met and that the disputed domain name should be transferred to it.

RESPONDENT

The Respondent challenged the Complainant's arguments and indicated that:

The string should be appreciated as a whole, and thus the risk of confusion should be demonstrated by the Complainants.

On the absence of interest, the Respondent indicated that the domain name was offering services and was duly exploited with an active AI-online project.

On the bad faith matter, the Respondent denied any such bad faith as the domain name was not offered for sale to the Complainants; the domain name and website attached do not mislead internet users.

RIGHTS

The Complainant has, to the satisfaction of the Panel, shown the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy).

NO RIGHTS OR LEGITIMATE INTERESTS

The Complainant has, to the satisfaction of the Panel, shown the Respondent to have no rights or legitimate interests in respect of the disputed domain name (within the meaning of paragraph 4(a)(ii) of the Policy).

BAD FAITH

The Complainant has, to the satisfaction of the Panel, shown the disputed domain name has been registered and is being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy).

PROCEDURAL FACTORS

The Panel is satisfied that all procedural requirements under UDRP were met and there is no other reason why it would be inappropriate to provide a decision.

PRINCIPAL REASONS FOR THE DECISION

In accordance with paragraph 4(a) of the Policy, in order to obtain the transfer of a domain name, the complainant has to demonstrate that:

1. The domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
2. The respondent has no rights or legitimate interests in respect of the domain name; and
3. The domain name has been registered and is being used in bad faith.

IDENTICAL OR CONFUSINGLY SIMILAR

The first requirement that the Complainant must establish is that the disputed domain name is identical with, or confusingly similar to, the Complainant's trademark.

There are two elements of this test: for each domain name, the Complainant must demonstrate that it has rights in a trademark or service mark and, if so, the disputed domain name must be shown to be identical or confusingly similar to the trademark or service mark.

The co-Complainants have proven ownership of the registered trademark "KLING" and "KLING AI", identified in section "Identification of rights".

The Panel observes that the registration of the Complainant's trademark predates the registration of the disputed domain name.

On the question of identity or confusing similarity, what is required is simply a comparison and assessment of the disputed domain name to the Complainant's trademarks.

The Trademark "KLING" and "KLING AI" are identically and entirely reproduced in the disputed domain name, the addition of the generic or common word "NSFW" does not modify the perception of the reproduction.

Furthermore, this finding is based on the settled practice in evaluating the existence of a likelihood of confusion of:

- disregarding the top-level suffix in the domain name (i.e. ".ai");

The Panel notes that a common practice has emerged under the Policy to disregard in appropriate circumstances the general Top-Level Domain ("gTLD") section of domain names for the purposes of the comparison under the Policy, paragraph 4(a)(i). The Panel sees no reason not to follow the same approach here, so it will disregard the ".ai" gTLD section of the disputed domain name.

- finding that the identical reproduction of the trademark right or the same with the addition of a generic or common word/acronym i.e. "nsfw" meaning "not safe for work" and used to warn that the corresponding content is explicit (sexual, violent, etc.) would not be considered sufficient to distinguish the domain name from the concerned trademarks being reproduced strictly identically, which is intentionally designed to be confusingly similar to the trademark. Moreover, it covers not only the activity of the Complainant, but also the benefits or financial revenue deriving from the Complainant's activity.

The disputed domain name is therefore confusingly similar to the earlier right "KLING" and "KLING AI", and the Panel concludes that the Complainant has satisfied the requirement under paragraph 4(a)(i) of the Policy.

RIGHTS OR LEGITIMATE INTERESTS

The second requirement that the complainant must prove is that the respondent has no rights or legitimate interests in the disputed domain name.

Paragraph 4(c) of the Policy provides that the following circumstances can be situations in which the respondent has rights or legitimate interests in a domain name:

1. before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
2. [the Respondent] (as an individual, business, or other organization) [has] been commonly known by the [disputed] domain name, even if [the Respondent] [has] acquired no trademark or service mark rights; or
3. [the Respondent] [is] making a legitimate non-commercial 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.

This is a non-exhaustive list of circumstances in which a respondent can show rights or legitimate interests in a domain name.

The onus of proving this requirement falls on the Complainant. UDRP panels have recognized that proving that a respondent lacks rights or legitimate interests in a domain name may result in the often impossible task of "proving a negative".

Accordingly, it is usually sufficient for a complainant to raise a prima facie case against the respondent and the burden of proof on this requirement shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in a domain name.

The Panel finds that the Complainant has made out a prima facie case that the Respondent does not have rights or legitimate interests in the disputed domain name.

In particular, the Complainant states that:

- It has no relationship whatsoever with the Respondent and has never licensed or otherwise authorized the Respondent to use the "KLING" and "KLING AI" trademarks in the disputed domain name;
- It has exclusive trademark rights which predate the registration of the disputed domain name;
- The Respondent cannot demonstrate any legitimate offering of goods or services under the "KLING" and "KLING AI" trademarks;
- In the absence of a license or permission from the Complainant concerning the use of its trademark, no bona fide or legitimate use of the disputed domain names can reasonably be claimed;
- No credible evidence that the Respondent is commonly known by the domain name is shown;
- The Respondent does not hold any trademark or service mark right on the "KLING" and "KLING AI" trademarks;

The disputed domain name resolves to a website offering identical services to that of the Complainants.

In the absence of any arguments or evidence to the contrary, this leads the Panel to the conclusion that it is more likely than not that the Respondent, being aware of the goodwill of the Complainants' "KLING" and "KLING AI" trademarks, has registered the disputed domain name targeting this trademarks in an attempt to exploit its goodwill by attracting Internet users who may believe that the disputed domain name and the website to which it redirects are somehow related to the Complainant.

Furthermore, the Respondent has failed to demonstrate any of the other non-exclusive circumstances evidencing rights or legitimate interests under paragraph 4(c) of the Policy or other evidence of rights or legitimate interests in the disputed domain names.

The Respondent does not appear to make any legitimate non-commercial or fair use of the disputed domain name, nor any use in connection with a bona fide offering of goods or services. Indeed, the disputed domain name appears to be an impersonation of the Complainants' website.

The Panel considers that, on the balance of probabilities, the Respondent knew the Complainants' trademarks and registered the disputed domain name with knowledge of the Complainants' rights. Indeed, it is not conceivable that the Respondents did not have the Complainants' trademarks in mind when registering and using the disputed domain name. Under these circumstances, it cannot be concluded that the Respondents are making a "fair" use of the disputed domain names.

Taking into account that the Respondents is not commonly known as the disputed domain name, that the Respondent has no connection or business relationship with the Complainant, that the Complainant has not authorized the Respondent to use its trademark in the disputed domain name, that the disputed domain name is used offering identical or similar services to that of the Complainants including reference to the KLING and KLING AI name, the Panel cannot imagine any possible legitimate justification for this use, and the Respondent has not come forward with any explanation that demonstrates any rights or legitimate interests in the disputed domain name.

Accordingly, the Panel finds that the Complainant has satisfied paragraph 4(a)(ii) of the Policy.

REGISTERED AND USED IN BAD FAITH

Under the third requirement of the Policy, the Complainant must establish that the disputed domain name has been both registered and used in bad faith by the Respondent.

Paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances that may indicate that a domain name was registered and used in bad faith, including:

- (i) circumstances indicating that [the Respondent] [has] registered or [has] acquired the [disputed] domain name primarily for the purpose of selling, renting, or otherwise transferring the [disputed] domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of [the Respondent's] documented out-of-pocket costs directly related to the [disputed] domain name; or
- (ii) [the Respondent] [has] registered the [disputed] domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that [the Respondent] [has] engaged in a pattern of such conduct; or

(iii) [the Respondent] [has] registered the [disputed] domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the [disputed] domain name, [the Respondent] [has] intentionally attempted to attract, for commercial gain, Internet users to [the Respondent's] web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of [the Respondent's] web site or location or of a product or service on [the Respondent's] web site or location.

The Panel, on the basis of the evidence presented, agrees with the Complainants' contentions that the disputed domain name was registered in bad faith and that it has been used in bad faith.

The Panel agrees that it is inconceivable that the Respondent was not aware of the Complainants' rights in the Complainants' trademarks when registering the disputed domain name simply by reproducing identically and adding a generic or common term/acronym "nsfw" and using it with AI generation services with the use of the trademarks KLING AI and KLING of the Complainant.

As regards the Respondent use of a privacy service when registering the disputed domain name, in line with other Panels' view, the Panel considers that, although the use of such service is not in and of itself an indication of bad faith, the circumstances and the manner in which such service is used may have an impact in the assessment of bad faith (see CAC Case No. 105097).

Hence, it comes out that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to the Respondent's web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's web site or location or of a product or service on [the Respondent's] web site or location.

Accordingly, the Panel finds that the disputed domain name was registered and is being used in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

AND THE DISPUTED DOMAIN NAME(S) IS (ARE) TO BE

- 1. nsfwkling.ai: Transferred

PANELLISTS

Name	David-Irving Tayer
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DATE OF PANEL DECISION 2026-08-24

Publish the Decision