

ADMINISTRATIVE PANEL DECISION

Peter Millar LLC v. Zhang Qiang, Grace Cross
Case No. D2025-2258

1. The Parties

The Complainant is Peter Millar LLC, United States of America (“United States”), represented by Demys Limited, United Kingdom.

The Respondents are Zhang Qiang, China, and Grace Cross, Spain.

2. The Domain Names and Registrar

The disputed domain names <petermillarargentina.com>, <petermillaraustralia.net>, <petermillarbelgie.com>, <petermillarbelgique.com>, <petermillarbrasil.com>, <petermillarbulgaria.com>, <petermillarcanada.net>, <petermillarchile.com>, <petermillarcolombia.com>, <petermillarcz.com>, <petermillardanmark.net>, <petermillardeutschland.net>, <petermillareesti.com>, <petermillarespaña.com> (xn--petermillarespaa-lub.com), <petermillarfrance.net>, <petermillargreece.com>, <petermillarhrvatska.com>, <petermillarhungary.com>, <petermillarireland.net>, <petermillarisrael.com>, <petermillaritaly.net>, <petermillarjapan.net>, <petermillarlatvija.com>, <petermillarlietuva.com>, <petermillarmexico.net>, <petermillarnz.net>, <petermillarperu.com>, <petermillarpolska.com>, <petermillarportugal.net>, <petermillarromania.net>, <petermillarslovenija.com>, <petermillarslovensko.com>, <petermillarsrbija.com>, <petermillarsverige.net>, <petermillaruae.com>, and <petermillaruk.net> are registered with Paknic (Private) Limited (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 10, 2025. On June 12, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On June 16, 2025, 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 Respondents (Zhang Qiang / Whois Agent (Web Domains By Proxy)) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 18, 2025, 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 June 20, 2025.

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 Respondents of the Complaint, and the proceedings commenced on July 8, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 28, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on July 29, 2025.

The Center appointed Jeremy Speres as the sole panelist in this matter on August 5, 2025. 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 2001, produces luxury apparel under its PETER MILLAR mark. The Complainant operates over 40 stores in the United States, as well as an Internet store from its website located at “www.petemillar.com”.

The Complainant’s mark is registered in numerous jurisdictions, including United States Trademark Registration No. 2881454 PETER MILLAR in class 25, having a registration date of September 7, 2004.

The disputed domain names were all registered on August 2, 2023. All except two resolve to websites that appear to offer the Complainant’s PETER MILLAR products for sale at discounted prices, displaying the Complainant’s logo, product and marketing images and descriptions taken from the Complainant’s website. The two disputed domain names which have been used differently are <petemillarmexico.net> and <petemillaraustralia.net>. The disputed domain name <petemillarmexico.net> resolves to a parking page displaying pay-per-click (“PPC”) advertising for men’s and ladies’ suits. The disputed domain name <petemillaraustralia.net> does not currently resolve to an active website, however, the Complainant’s evidence establishes that it was previously used in the same manner as the majority of the disputed domain names.

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 the disputed domain names were registered and have been used in bad faith in order to impersonate the Complainant for the Respondents’ commercial gain.

B. Respondents

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

6. Discussion and Findings

A. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants: the Registrar verified registrant for <petermillarespaña.com> (xn--petermillarespaa-lub.com) - Grace Cross - differed from the registrant for the remaining 35 disputed domain names - Zhang Qiang. The Complainant alleges that these 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 Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

As regards common control, the Panel notes that all of the disputed domain names were registered on the same day at the same Registrar. The single disputed domain name that has a nominally different Registrar verified registrant, <petermillarespaña.com> (xn--petermillarespaa-lub.com), is used for a website that is highly similar to the websites of the majority of the remaining disputed domain names. Its website also features a contact email address that is identical to that displayed on the websites of the majority of the remaining disputed domain names. The Panel therefore considers that it is more likely than not that <petermillarespaña.com> (xn--petermillarespaa-lub.com) is under common control with the remaining disputed domain names.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party, especially given that the Respondents have not incurred the costs of responding.

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.

B. 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 3.0](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the Complainant's registered PETER MILLAR mark is reproduced within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms, here various geographic terms, may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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

C. 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 3.0](#), 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 names. 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 names such as those enumerated in the Policy or otherwise.

The general impression created by the websites to which the majority of the disputed domain names resolve is one of impersonation of the Complainant. UDRP panels have categorically held that the use of a domain name for illegitimate activity, here impersonation, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1. To the extent that the disputed domain names’ websites might be considered those of a reseller of the Complainant’s products, they do not meet the requirements of the well-known Oki Data test given that the sites do not accurately and prominently disclose the Respondent’s relationship with the Complainant. *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#); and [WIPO Overview 3.0](#), section 2.8. Insofar as the disputed domain name <petermillarmexico.net> resolves to a parking page displaying PPC advertising for men’s and ladies’ suits, use of a domain name to host PPC links does not represent a bona fide offering where such links compete with the complainant’s mark, as in this case. [WIPO Overview 3.0](#), section 2.9.

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

D. 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. For the reasons discussed below, the Panel finds that paragraph 4(b)(iv) of the Policy is eminently applicable to this case.

Panels have held that the use of a domain name for illegitimate activity, here impersonation, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Considering the indicators of impersonation apparent on the majority of the disputed domain names’ websites highlighted in the Factual Background section above, it is clear that the Respondent intended to impersonate the Complainant. Regarding the disputed domain name <petermillarmexico.net>, which is used for a parking page displaying PPC advertising competing with the Complainant, given the identical naming pattern of that disputed domain name compared with the rest of the disputed domain names, and given its use for competing advertisements, it is quite clear that the Respondent intended to capitalize on confusion with the Complainant, as it did in relation to the remaining 35 disputed domain names.

The composition of the disputed domain names, consisting of the Complainant's mark plus geographic terms, in and of itself suggests that the disputed domain names each relate to an official presence of the Complainant in a particular geographic region. This, too, points to an intention to impersonate the Complainant. [WIPO Overview 3.0](#), section 3.2.1.

The Respondent, under the name "Zhang Qiang", has targeted the Complainant's rights before, namely the Complainant's G/FORE mark as evident in *Peter Millar LLC v. Zhang Qiang*, WIPO Case No. [D2024-0644](#). The same Respondent also appears to have been the respondent in numerous other cases under the Policy where the panels found cybersquatting by the Respondent in circumstances similar to the present. See, for example, *Frankie Shop LLC v. Zhang Qiang*, WIPO Case No. [D2024-0776](#). The Respondent is a serial cybersquatter and this case appears to be a continuation of that pattern.

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 names <petermillarargentina.com>, <petermillaraustralia.net>, <petermillarbelgie.com>, <petermillarbelgique.com>, <petermillarbrasil.com>, <petermillarbulgaria.com>, <petermillarcanada.net>, <petermillarchile.com>, <petermillarcolombia.com>, <petermillarcz.com>, <petermillardanmark.net>, <petermillardeutschland.net>, <petermillareesti.com>, <petermillarespaña.com> (xn--petermillarespaa-lub.com), <petermillarfrance.net>, <petermillargreece.com>, <petermillarhrvatska.com>, <petermillarhungary.com>, <petermillarireland.net>, <petermillarisrael.com>, <petermillaritaly.net>, <petermillarjapan.net>, <petermillarlatvija.com>, <petermillarlietuva.com>, <petermillarmexico.net>, <petermillarnz.net>, <petermillarperu.com>, <petermillarpolska.com>, <petermillarportugal.net>, <petermillarromania.net>, <petermillarslovenija.com>, <petermillarslovensko.com>, <petermillarsrbija.com>, <petermillarsverige.net>, <petermillaruae.com>, and <petermillaruk.net> be transferred to the Complainant.

/Jeremy Speres/

Jeremy Speres

Sole Panelist

Date: August 8, 2025