

ADMINISTRATIVE PANEL DECISION

Lancaster SARL v. Zhang Qiang

Case No. D2025-3184

1. The Parties

The Complainant is Lancaster SARL, France, represented by Hogan Lovells (Paris) LLP, France.

The Respondent is Zhang Qiang, China.

2. The Domain Names and Registrar[s]

The disputed domain names:

<lancasterbelgie.com>, <lancasterbrasil.com>, <lancasterdanmark.com>, <lancastergreece.com>, <lancasterjapan.com>, <lancasternederland.com>, <lancasterportugal.com>, <lancastersrbija.com> 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 August 8, 2025. On August 11, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On August 13, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to the Complainant on August 19, 2025, providing the registrant and contact information disclosed by the Registrar.

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 August 20, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 9, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 11, 2025

The Center appointed Meera Chature Sankhari as the sole panelist in this matter on September 23, 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 is a French leather goods company founded in Paris in the 1990s. The Complainant offers a wide range of products including handbags, wallets, small leather goods and travel items, with a catalogue of over 750 products per season. The Complainant operates over 10 stores and an online e-commerce site. The Complainant's goods are offered via over 1,000 resellers throughout Europe and in Asia.

The Complainant holds trademark registrations for LANCASTER in several jurisdictions worldwide, including the LANCASTER (device) mark registered in the United Kingdom under trademark No. UK00003697691, registered April 29, 2022, and International Registration No. 490672C, registered February 4, 1985. The Complainant is also the registered proprietor of the LANCASTER (word mark) under trademark No. 018340878 in the European Union, registered March 12, 2021.

The Complainant operates an online e-commerce site via its domain name, <lancaster.com>.

Eight (8) disputed domain names were registered in the name of the Respondent and with the same Registrar on the following dates:

<lancasterbelgie.com> - June 26, 2023,
<lancasterbrasil.com> - June 27, 2023,
<lancasterdanmark.com> - June 26, 2023,
<lancastergreece.com> - June 27, 2023,
<lancasterjapan.com> - June 27, 2023,
<lancasternederland.com> - June 26, 2023,
<lancasterportugal.com> - June 27, 2023,
<lancastersrbija.com> - June 27, 2023.

The disputed domain names either currently or previously resolved to a website titled "Lancaster Paris" purporting to offer for sale Lancaster handbags and featuring similar images to those featured on the Complainant's website. The disputed domain names featured copyright notices in the footers that refer to the Complainant.

Two of the eight disputed domain names, namely <lancastergreece.com> and <lancasterportugal.com> previously resolved to active websites and currently resolve to GoDaddy parking pages featuring Pay-Per-Click ("PPC") links. The remaining six disputed domain names were active at the time of filing the Complaint.

On June 14, 2025, the Complainant received a report that an Internet user and prospective customer had placed an order through the Respondent's disputed domain name <lancasterjapan.com>, and had never received the product after making the payment. The Internet user stated that he was "beginning to worry if there might be an issue with the order or if the website I used was legitimate".

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 are confusingly similar to its LANCASTER trademark, as each incorporates the mark “LANCASTER” in its entirety, followed by the addition of geographic terms such as “belgie”, “brasil”, “danmark”, “greece”, “japan”, “nederland”, “portugal”, and “srbiya”.

The Complainant submits that the Respondent has no rights or legitimate interests in the disputed domain names. The Complainant argues that the Respondent is not using the disputed domain names in connection with any bona fide offering of goods or services as there is no connection between the Respondent and the Complainant. The Respondent is neither a licensee, distributor, nor in any way affiliated with the Complainant, and has not been authorized by the Complainant to use its LANCASTER trademark in any manner, including in a domain name. The Complainant alleges that the disputed domain names impersonate it by displaying similar images from its official website and offering products under the LANCASTER trademark. Based on this and the reported fraudulent activity affecting the Internet user, the Complainant infers that the disputed domain names form a part of a single fraudulent scheme intended to mislead users into believing that the websites are owned, endorsed, or affiliated with the Complainant. Accordingly, the Respondent cannot be said to be making any legitimate, noncommercial, or fair use of the disputed domain names.

The Complainant further submits that the non-use of <lancastergreece.com> and <lancasterportugal.com> amounts to passive holding and does not constitute legitimate or fair use. Lastly, the Complainant asserts that the Respondent is not commonly known by the disputed domain names, as there is no similarity between the Respondent's name and the disputed domain names, nor is there any evidence that the Respondent holds trademark rights in “lancaster” or any of its variations.

The Complainant submits that LANCASTER trademark is well known and enjoys considerable goodwill and is internationally renowned. The Complainant contends that the Respondent had actual knowledge of the Complainant and its mark, as the disputed domain names display the LANCASTER logo and figurative trademark, offer LANCASTER products for sale, and uses images identical to or similar to those on the Complainant's website. The Complainant further argues that such use, without any disclaimer indicating non-affiliation, creates a false impression of association with the Complainant. The Complainant further argues that the registration of eight domain names comprising of Complainant's trademarks indicates pattern of bad faith registrations. The Complainant asserts that by using the disputed domain names in this manner, the Respondent has intentionally attempted to attract Internet users for commercial gain, by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation, or endorsement of the disputed domain names and the goods offered for sale thereby acting in bad faith. The Respondent's use of the disputed domain name <lancasterjapan.com> to commit fraud against the Internet users is further evidence of bad faith and the Complainant draws an inference from this report that the remaining disputed domain names also form a part of the same fraudulent online scheme. Thus, the disputed domain names are registered and used in bad faith.

B. Respondent

The Respondent did not reply to the Complainant's contentions

6. Discussion and Findings

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 Selected UDRP Questions, Third Edition, (“[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 Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. Addition of geographic terms, such as “belgie”, “brasil”, “danmark”, “greece”, “japan”, “nederland”, “portugal”, and “srbija”, 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 1.7.

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 the disputed domain names.

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.

Panels have held that the use of a domain name for illegitimate activity here, claimed impersonation/passing off can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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

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 notes that the Respondent’s registration and use of eight disputed domain names using the Complainant’s LANCASTER mark establishes a clear pattern of bad faith registration targeting the Complainant. This is also clear from the use of the Complainant’s LANCASTER logo by the Respondent on the disputed domain names’ respective websites and identifying the bags displayed on the websites as “LANCASTER Paris” given that the Complainant is a Parisian company. All of these factors create a likelihood of confusion among Internet users regarding their source, sponsorship, affiliation, or endorsement. The Panel concurs with the Complainant’s claims that the Respondent is deliberately misleading the Complainant’s customers to the disputed domain names to commit fraud against them, which is further demonstrated by the report received by the Complainant from an Internet user of the disputed domain name <lancasterjapan.com>. Such actions clearly constitute evidence of bad faith registration.

Panels have held that the use of a domain name for illegitimate activity here, claimed impersonation/passing off constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitutes bad faith under the Policy.

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 following disputed domain names be transferred to the Complainant:
<lancasterbelgie.com>, <lancasterbrasil.com>, <lancasterdanmark.com>, <lancastergreece.com>, <lancasterjapan.com>, <lancasternederland.com>, <lancasterportugal.com>, <lancastersrbija.com>

/Meera Chature Sankhari/

Meera Chature Sankhari

Sole Panelist

Date: October 8, 2025