

## ADMINISTRATIVE PANEL DECISION

Leon Max, Inc. v. zhao anxiang, zhao anxiang , Shazia Parveen  
Case No. D2026-0722

### 1. The Parties

The Complainant is Leon Max, Inc., United States of America (“United States”), represented by Fross Zelnick Lehrman & Zissu, PC, United States.

The Respondent is zhao anxiang, zhao anxiang, China, and Shazia Parveen, Pakistan.

### 2. The Domain Names and Registrars

The disputed domain name <maxstudiobrand.com> is registered with Tucows Domains Inc.; and the disputed domain name <maxstudiostore.com> is registered with Spaceship, Inc. (the “Registrars”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 19, 2026. On February 20, 2026, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. On February 20, 2026, the Registrars transmitted by email to the Center their verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted for Privacy) and contact information in the Complaint.

The Center sent an email communication to the Complainant on February 23, 2026 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar(s), 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 amended Complaints on February 25, 2026 and February 27, 2026.

The Center verified that the Complaint together with the amended Complaints 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 March 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 22, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on March 23, 2026.

The Center appointed Andrea Cappai as the sole panelist in this matter on March 25, 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 is Leon Max, Inc., a California corporation. The Complainant states that it operates a women's fashion business under the MAX STUDIO name.

The Complainant is the owner, among others, of the following trademark registrations (International Class 25):

- MAX STUDIO – United States – No. 1358151 – registered on September 3, 1985.
- MAX STUDIO – United States – No. 6053854 – registered on May 12, 2020.

The disputed domain names are <maxstudiostore.com> and <maxstudiobrand.com>. The record shows that <maxstudiostore.com> was created on December 6, 2025, and <maxstudiobrand.com> was created on March 5, 2025.

The screenshots submitted in the record show websites associated with the disputed domain names displaying the MAX STUDIO name and presenting pages such as "About us" and "Contact us", including contact email addresses and a postal address in the same location. The same materials include an Amazon affiliate disclosure stating that the site is a participant in the Amazon Services LLC Associates Program, together with calls to action such as "Shop on Amazon" and "Buy on Amazon", and an example of an Amazon URL including an affiliate tag.

The Complaint was filed against nominally different registrants for the two disputed domain names. The registrar disclosures in the course of the proceeding identified separate underlying registrants, with disclosed contact details including country codes for China and Pakistan. The Respondents did not submit a Response.

The Complainant has requested that the disputes concerning the two disputed domain names be consolidated in a single proceeding.

#### **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 MAX STUDIO trademark because they reproduce the mark in its entirety with the addition of the terms "store" and "brand", which it submits does not avert confusing similarity. The Complainant further submits that the Respondents have no rights or legitimate interests, asserting that they are not affiliated with, or authorised by, the Complainant and are using the disputed domain names for websites which purport to be connected with the Complainant, contain no clear disclaimer, and direct Internet users to third-party retailer pages, including via redirection to Amazon and affiliate linking. The Complainant also seeks consolidation against

the nominally different registrants, alleging common control based on the similarities between the websites and the contact details displayed and raising concerns as to the completeness or accuracy of the registrant contact information. Finally, the Complainant alleges bad faith, asserting that the disputed domain names were chosen with knowledge of the Complainant's rights to attract Internet users for commercial gain by creating a likelihood of confusion with the MAX STUDIO mark as to source, sponsorship, affiliation, or endorsement, including through the presentation and content of the websites, which it further alleges are virtually identical and include copied images and text.

## **B. Respondents**

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

## **6. Discussion and Findings**

### **Consolidation: Multiple Respondents**

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the disputed 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 submitted materials show websites associated with the disputed domain names displaying the MAX STUDIO name and presenting overlapping contact details, including the same postal address. The Panel further notes that the websites appear to share materially similar structural elements and calls to action, including redirection to Amazon and affiliate linking. In light of these indicia, and in the absence of any response, the Panel finds on the balance of probabilities that the disputed domain names and the corresponding websites are subject to common control for the purposes of consolidation.

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.

### **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 3.1](#), section 1.7.

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

Although the addition of other terms, such as “brand” and “store”, 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 name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

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 a disputed domain name.

Although the overall burden of proof in UDRP proceedings is on the 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 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 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 Complainant states that it has not authorised the Respondent to use the MAX STUDIO trademark, and there is no evidence before the Panel that the Respondent has been commonly known by either disputed domain name. The materials before the Panel show that each disputed domain name was associated with a website prominently featuring the MAX STUDIO name and brand-style narrative text (including references to “since 1979”), together with calls to action directing Internet users to Amazon and an Amazon Associates disclosure. In the Panel’s view, these features suggest that the websites may be designed to monetise traffic drawn to the disputed domain names, without any clear statement of non-affiliation.

In these circumstances, the Panel sees no evidence that the Respondent is using the disputed domain names in connection with a bona fide offering within the meaning of paragraph 4(c)(i) of the Policy. Nor is there any indication of legitimate noncommercial or fair use under paragraph 4(c)(iii) of the Policy.

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 registered the disputed domain names <maxstudiostore.com> and <maxstudiobrand.com>, each of which reproduces the Complainant’s MAX STUDIO trademark in its entirety with the addition of the terms “store” and “brand”. The Panel further notes

that the disputed domain names were registered long after the Complainant's trademark registrations. The Panel considers that the composition of the disputed domain names, which suggests an official "store" or "brand" presence for the MAX STUDIO mark, supports an inference that the Respondent had the Complainant and its trademark in mind when registering the disputed domain names.

The materials before the Panel show that each disputed domain name was associated with a website prominently featuring the MAX STUDIO name and brand-style narrative text (including references to "since 1979"), presented in a manner suggesting an official brand website without any clear statement of non-affiliation. The same materials include an Amazon Associates disclosure and calls to action directing Internet users to Amazon, including an example of an Amazon URL containing an affiliate tag. In the Panel's view, this evidence is relevant both to the Respondent's intent at the time of registration and to the subsequent use of the disputed domain names: it indicates that the disputed domain names were selected to draw Internet users by reference to the Complainant's mark, and that the resulting traffic was then channeled in a manner designed to generate commercial gain through affiliate redirection.

Taken together, the composition of the disputed domain names, the manner in which the MAX STUDIO trademark is presented on the associated websites, the absence of any clear statement of non-affiliation, and the apparent affiliate redirection to Amazon support the conclusion that the Respondent intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's MAX STUDIO trademark as to source, sponsorship, affiliation, or endorsement, within the meaning of paragraph 4(b)(iv) of the Policy. The Respondent has not provided any explanation for this conduct.

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 <maxstudiobrand.com> and <maxstudiostore.com> be transferred to the Complainant.

*/Andrea Cappai/*

**Andrea Cappai**

Sole Panelist

Date: April 9, 2026