

ADMINISTRATIVE PANEL DECISION

Paris Saint-Germain Football v. Luis Alberto Laichter and lianxin zhou
Case No. D2025-0556

1. The Parties

The Complainant is Paris Saint-Germain Football, France, represented by Plasseraud IP, France.

The Respondents are Luis Alberto Laichter, Argentina, and lianxin zhou, Hong Kong, China.

2. The Domain Names and Registrars

The disputed domain names <parissaint-germain.com> and <parissaint-germain.org> are registered with Sav.com, LLC; the disputed domain name <parissaint-germain.tv> is registered with NameSilo, LLC (the "Registrars").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 12, 2025. On February 12, 2025, the Center transmitted by email to the Registrars requests for registrar verification in connection with the disputed domain names. On February 12, 2025, the Registrars transmitted by email to the Center its verification response, disclosing registrant and contact information for the disputed domain names which partly differed from the named Respondent (LUIS ALBERTO LAICHTER, REDACTED FOR PRIVACY, Privacy Protection, Registry Services, LLC) and contact information in the Complaint.

The Center sent an email communication to the Complainant on February 13, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, 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 February 18, 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 February 20, 2025. In accordance with the Rules, paragraph 5, the due date for Response was March 12, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on March 13, 2025.

The Center appointed Zoltán Takács as the sole panelist in this matter on March 21, 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, which is a French company, registered and based in Paris, France is a famous soccer club also known as "PSG".

The Complainant was established in 1970 and enjoys a considerable reputation in the world of professional soccer. The official Facebook page of the Complainant has more than 46 million "likes" and 52 million followers, while its X (formerly Twitter) account has more than 15 million followers. The Complainant's official Instagram account has more than 63 million followers.

The Complainant is among others owner of the International Trademark Registration No. 1410110 for the word mark PARIS SAINT-GERMAIN registered since November 27, 2017 in multiple classes of goods and services and valid in multiple jurisdictions around the world.

The Complainant also owns multiple trademark registrations in Argentina. By way of example the figurative mark inclusive of PARIS SAINT-GERMAIN has been registered since July 24, 2015 under registration number 2743631.

The disputed domain names were registered on the following dates: <parissaint-germain.com> and <parissaint-germain.tv> on December 29, 2019, and October 24, 2021 by Luis Alberto Laichter (First Respondent), and <parissaint-germain.org> on August 29, 2021 by lianxin zhou (Second Respondent).

The disputed domain name <parissaint-germain.org> first resolved to the parking page of the Registrar Sav.com, LLC and after that redirected to the commercial website of the First Respondent at "www.seblanc.com" (indicating "this Domain is for sale") that promoted its services of acquisition and management of domain names. The disputed domain names <parissaint-germain.com> and <parissaint-germain.tv> redirected to the commercial website of the First Respondent at "www.seblanc.com".

On October 10, 2022, the First Respondent contacted directly the Complainant and made an unsolicited offer to sell the disputed domain names.

Currently the disputed domain names are not actively used; <parissaint-germain.org> does not resolve to any webpage or website; while <parissaint-germain.com> and <parissaint-germain.tv> redirect to "www.seblanc.com" which displays the parking page of the cloud-based web developer Wix.com.

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:

- apart from the addition of a hyphen, the disputed domain names are virtually identical to its trademark;
- the Respondents have no rights or legitimate interests in respect of the disputed domain names since they are unable to rely on any of the circumstances set out in paragraphs 4(c)(i), (ii), or (iii) of the Policy;
- the First Respondent's unsolicited offer to the Complainant to sell the disputed domain names comprising the Complainant's well-known mark is evidence of the Respondents' knowledge of its prior rights and indicative of bad faith;
- the Respondents have engaged in a pattern of trademark-abusive domain name registrations.

The Complainant requests that the disputed domain names be transferred from the Respondents to the Complainant.

B. Respondents

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

6. Discussion and Findings

6.1. Procedural Issue - Consolidation: Multiple Respondents

The amended Complaint was filed in relation to three domain names registered by nominally two 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 Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.11.2.

As regards common control, the Panel notes the identical structure of the disputed domain names and that the First Respondent offered to sell to the Complainant all three disputed domain names which all redirected at some point to the First Respondent's commercial site at "www.seblanc.com".

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair and 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.

6.2 Substantive Issues

A complainant must evidence each of the three elements required by paragraph 4(a) of the Policy in order to succeed on the complaint, namely that:

- (i) the domain names are identical or confusingly similar to a trademark or service mark in which the complainant has rights;
- (ii) the respondent has no rights or legitimate interests in respect of the domain names, and
- (iii) the domain names have been registered and are being used in bad faith.

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 3.0](#), 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 Complainant's PARIS SAINT-GERMAIN mark is reproduced within the disputed domain names. Accordingly, the disputed domain names are identical to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel finds that 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 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 Complainant has not authorized, licensed, or allowed the Respondent to use its mark in the disputed domain names or in any other way that would confer legitimacy upon such usage.

The disputed domain names are virtually identical to the Complainant's mark. The Panel finds that the fame of the Complainant's mark, the use of the disputed domain names and the Respondent's attempt to sell the disputed domain names to the Complainant, as discussed below, are sufficient to infer intent to target the trademark value of the terms the disputed domain names are composed of on the part of the Respondent.

Furthermore, and in view of the above, the Respondent's use of the disputed domain names corresponding to the Complainant's mark to resolve to the Registrar's parking page or to redirect Internet users to its own commercial website promoting services of acquisition and management of domain names does not amount

to bona fide offering of goods or services, or to noncommercial or fair use of the disputed domain names. [WIPO Overview 3.0](#), section 2.5.3.

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.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitute bad faith under the Policy.

In the present case, the Panel notes that prior decisions under the UDRP established the well-known status of the Complainant's mark which predates the date of registration of the disputed domain names (see e.g., *Paris Saint-Germain Football v. Andres Vallverde Garcia*, WIPO Case No. [D2018-0006](#)). UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4.

As mentioned above, prior to any contact by the Complainant and commencement of any proceedings the Respondent sent an unsolicited email to the Complainant in which it offered to sell the disputed domain names to the Complainant. In reply to the Complainant's representatives cease-and-desist letter the Respondent stated that the Complainant's purchase of the disputed domain names would cost less than attempting to enforce its rights through costly proceedings with likely unpredictable outcomes. The Respondent stated that such costs would be USD 4,000 minimum. These facts convince the Panel that the Respondent registered the disputed domain names in violation of paragraph 4(b)(i) of the Policy, that is primarily to sell them to the Complainant for valuable consideration in excess of the Respondent's out-of-pocket costs related to the disputed domain names.

In addition, the Respondents have engaged in a pattern of trademark-abusive domain name registrations (see e.g., *Virgin Enterprises Limited v. WhoisGuard, Inc./Luis Alberto Laichter*, WIPO Case No. [D2016-2177](#); *TPG Telecom Limited v. Luis Alberto Laichter*, WIPO Case No. [D2024-1098](#); *Meta Platforms, Inc. v. Domain Administrator, See Privacy Guardian.org v. Lianxin Zhou*, WIPO Case No. [D2022-2397](#); and *United Talent Agency, LLC v. Lianxin Zhou*, WIPO Case No. [D2024-1160](#)). Such conduct is further evidence of bad faith. [WIPO Overview 3.0](#), section 3.1.1.

Currently the disputed domain names do not resolve to active websites.

However, panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. In this context, the Panel notes the reputation of the Complainant's mark; the composition of the disputed domain names as well as the previous use of the disputed domain names; the Respondent's attempt to sell them to the Complainant and failure to submit a response, and finds that in the circumstances of this case the current passive holding of the disputed domain names does not prevent a finding of 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 disputed domain names <parissaint-germain.com>, <parissaint-germain.org> and <parissaint-germain.tv> be transferred to the Complainant.

/Zoltán Takács/

Zoltán Takács

Sole Panelist

Date: April 3, 2025