

ADMINISTRATIVE PANEL DECISION

Science of Skincare, LLC v. Domain Privacy, Domain Name Privacy Inc, and
于青青 (yu qing qing)

Case No. D2025-1434

1. The Parties

The Complainant is Science of Skincare, LLC, United States of America (“United States”), represented by 101domain.com, United States.

The Respondents are Domain Privacy, Domain Name Privacy Inc, Cyprus, and 于青青 (yu qing qing), China.

2. The Domain Names and Registrars

The disputed domain name <isclinical.online> is registered with Communigal Communications Ltd. and the disputed domain name <isclinical.xyz> is registered with Alibaba Cloud Computing Ltd. d/b/a HiChina (www.net.cn) (collectively referred to as the “Registrar”).

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on April 7, 2025. On April 8, 2025, the Center transmitted by emails to the Registrar requests for registrar verification in connection with the disputed domain names. On April 9 and 17, 2025, the Registrar transmitted by emails to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted for Privacy, Information not available on WHOIS) and contact information in the Complaint.

The Center sent an email communication to the Complainant on April 17, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaints 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 disputed domain names are under common control. The Complainant filed an amended Complaint in English on April 29, 2025, and further amendments to the Complaint in English respectively on May 1 and 6, 2025. On April 29, 2025, the Complainant also filed a request for consolidation of the disputes against both Respondents.

On April 17, 2025, the Center informed the Parties in Chinese and English, that the language of the Registration Agreement for the disputed domain name <isclinical.xyz> is Chinese. On April 29, 2025, the

Complainant requested English to be the language of the proceeding. The Respondents did not submit any comment on the Complainant's submission.

The Center verified that the Complaint together with the amended Complaint and further amendments to the 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 in Chinese and English of the Complaint, and the proceedings commenced on May 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 1, 2025. The Respondents did not submit any Response. Accordingly, the Center notified the Respondents' default on June 5, 2025.

The Center appointed Jonathan Agmon as the sole panelist in this matter on June 12, 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 well-recognized global skincare and cosmetic company with a prominent industry presence known for providing botanically based skincare products.

The Complainant is the owner of various trademark registrations for IS CLINICAL, including:

- United States trademark registration no. 3069395 for IS CLINICAL, registered on March 14, 2006; and
- European Union trademark registration no. 014811152 for IS CLINICAL, registered on May 20, 2016.

The Complainant operates various domain names, including its primary domain name, <isclinical.com>.

The disputed domain names are:

- <isclinical.online>, registered on January 27, 2025. At the time of this decision, it resolves to a parking page containing Pay-Per-Click ("PPC") links, and is also being offered for sale on Dan.com; and
- <isclinical.xyz>, registered on March 8, 2024. At the time of this decision, it resolves to an inactive webpage, while also being offered for sale on Dan.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:

- The disputed domain names are identical or confusingly similar to the Complainant's IS CLINICAL trademark. The Complainant has trademark registrations for IS CLINICAL, and has consistently used its IS CLINICAL trademark for over two decades, creating a global name in the beauty industry. The vast majority of the Complainant's products prominently display its IS CLINICAL trademark, resulting in instant brand recognition and visibility. The disputed domain names contain the entirety of the Complainant's IS CLINICAL trademark, with the appending of the generic Top-Level Domains ("gTLDs") ".online" and ".xyz".

- The Respondents have no rights or legitimate interests in the disputed domain names. There is no evidence that the Respondents are commonly known by any of the disputed domain names. The Respondents registered the disputed domain names for the purpose of disrupting and profiting from the business of the Complainant. The Respondents have no trademark registrations for IS CLINICAL, and have no legitimate connection to the IS CLINICAL trademark. The Respondents are trading on the goodwill the Complainant has established under the IS CLINICAL brand, and the disputed domain names are being used to deceive the Complainant's customers, and divert them away from the Complainant's primary domain name and its products and services. This also has the effect of disrupting the Complainant's business and tarnishing the Complainant's IS CLINICAL trademark. The Complainant has not licensed or allowed the Respondents to use the Complainant's IS CLINICAL trademark for any purpose. The Respondents have not provided any evidence of any bona fide use, or demonstrable preparations to use the disputed domain names in connection with any legitimate offering of goods or services. Both disputed domain names are listed for sale on Dan.com by the same seller, "pace.domains", for the price of USD 1,450. The Mail Exchange ("MX") records for the disputed domain name <isclinical.online> have also been created, which has been flagged to indicate that the disputed domain name <isclinical.online> is likely being used by the Respondents to facilitate fraudulent communications with the Complainant's customers.

- The disputed domain names were registered and are being used in bad faith. The Respondents registered the disputed domain names to prevent the Complainant from utilizing its IS CLINICAL trademark in the corresponding domain names. The Respondents are using the disputed domain names to confuse customers who associate the Complainant's IS CLINICAL brand with the Complainant. The Respondents registered the disputed domain names to perpetuate consumer confusion with the Complainant's company and its IS CLINICAL trademarks by seeking to profit on that association. The Respondents' registration of the disputed domain names prevents the Complainant from registering the same domain names. Since the registration of the disputed domain names, there is no evidence that the Respondents have used or are preparing to use them for any legitimate purpose. The Respondents are misusing the disputed domain names primarily for the purpose of disrupting the Complainant's business operations. The MX and Sender Policy Framework ("SPF") records of the disputed domain name <isclinical.online> have been configured, which likely means that the disputed domain name <isclinical.online> is being used to contact the Complainant's current and prospective customers with an email at a domain name that incorporates the Complainant's entire trademark. The Respondents' registration of the disputed domain names constitutes cybersquatting activity, with the sole purpose to divert Internet traffic to the Respondents' website and prevent access to the Complainant's own domain names. The registration details of one of the Respondents belong to an entity with a history of cybersquatting behaviour. Both disputed domain names were highly likely to be registered by the same entity, but under different aliases to conceal its true identity. Both disputed domain names are listed for sale on Dan.com by the same vendor, "pace.domains". The Respondents are also utilizing a Whois privacy service to conceal the common control and ownership of the disputed domain names, and are impersonating multiple registrants. The Respondents have also demonstrated a pattern of registering domain names which infringe on brands such as "Disney, Netflix, and Nintendo", with the intention of listing them for resale.

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 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. The Panel cites with agreement the decision in *Speedo Holdings B.V. v. Programmer, Miss Kathy Beckerson, John Smitt, Matthew Simmons*, WIPO Case No. [D2010-0281](#), "While the consolidation of multiple complainants and that of multiple respondents are both subject to paragraph 10(e) of the Rules, the Panel nonetheless notes that the decision criteria for these two types of consolidations, while not dissimilar, do not constitute mirror images. Significantly, paragraph 3(c) of the Rules provides that a complaint may relate to more than one domain name only when the domain names are registered by the same domain-name holder. Further, the definition of 'Respondent' in paragraph 1 of the Rules – 'the holder of a domain-name registration against which a complaint is initiated' – seems to contemplate the inclusion of at least the person or entity identified as the holder of the domain name in the concerned registrar's Whois records at the time the complaint is initiated. See *ISL Marketing AG, and The Federation Internationale de Football Association v. J.Y. Chung, Worldcup2002.com, W Co., and Worldcup 2002*, WIPO Case No. [D2000-0034](#). Thus, the Policy would seem to require a complainant to initiate separate proceedings against each domain name registrant, absent a either a showing that the relevant domain name registrants are in fact one singular domain name holder under paragraph 3(c) of the Rules or a successful request for consolidation of the multiple domain name disputes under paragraph 10(e) of the Rules. See *General Electric Company v. Marketing Total S.A, supra*."

As regards common control, the Panel notes that both disputed domain names are listed for sale by the same seller, "pace.domains". The Complainant asserts that both disputed domain names are listed for sale for USD 1,450. However, the evidence submitted by the Complainant shows the disputed domain name <isclinical.xyz> is listed for sale for USD 1,450 while the disputed domain name <isclinical.online> is listed for sale for USD 950. "[P]ace.domains", as the evidence shows, listed for sale multiple other domain names. "[P]ace.domains" can therefore refer to a service or an agent that may offer multiple domain names for sale to various domain name holders, including the Respondents, and there is no indication in the record that "pace.domains" itself, either controls or owns or has common control over both disputed domain names. Therefore, without anything more, this evidence alone is insufficient to show common control. In addition, although the disputed domain names are identical save for the gTLDs, they were registered with different registrars and were registered almost 11 months apart from each other. Moreover, while both disputed domain names are offered for sale on Dan.com, one disputed domain name resolves to an inactive website and the other disputed domain name resolves to a PPC website.

Under the circumstances, the Panel rejects the Complainant's request to consolidate the disputes regarding the different disputed domain name registrants and will proceed against the Respondent - Domain Privacy, Domain Name Privacy Inc, Cyprus (hereinafter referred to as "the Respondent") regarding the disputed domain name <isclinical.online> (hereinafter referred to as "the disputed domain name"). The Complaint against the Respondent, 于青青 (yu qing qing), China, is rejected without prejudice to the filing of a new complaint regarding the disputed domain name <isclinical.xyz>.

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 Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is identical to 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 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 name. 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 name such as those enumerated in the Policy or otherwise.

There is no evidence to suggest that the Respondent is commonly known by the disputed domain name. The Complainant’s registration of its trademark predates the registration of the disputed domain name. The disputed domain name resolves to a parked website displaying PPC links which advertise goods and/or services which compete with the Complainant’s own offerings. This suggests that the Respondent is targeting the Complainant and is likely attempting to divert Internet traffic away from the Complainant’s website. There is also an advertisement banner on the Respondent’s website that advertises that the disputed domain name <isclinical.online> may be for sale. The disputed domain name is also advertised for sale on Dan.com for the sum of USD 950, a sum which likely exceeds the out-of-pocket registration costs for the disputed domain name. The Panel is of the view that there is no evidence that the Respondent is using or preparing to use the disputed domain name for any legitimate purpose.

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 name long after the Complainant registered its IS CLINICAL trademark. Given the distinctiveness of the Complainant’s IS CLINICAL trademark and the specific use the Respondent is making of the Complainant’s IS CLINICAL trademark, it is highly unlikely that the Respondent was not aware of the Complainant and its trademark prior to the registration of the disputed domain name. This is especially so as the disputed domain name comprises of the Complainant’s IS CLINICAL trademark, with no alterations. The disputed domain name resolves to a parked website displaying PPC links which advertise goods and/or services which compete with the Complainant’s own offerings. This suggests that the Respondent is targeting the Complainant and is likely attempting to divert Internet traffic away from the Complainant’s website. There is also an advertisement banner on the Respondent’s website that advertises that the disputed domain name

<isclinical.online> may be for sale. The disputed domain name is also advertised for sale on Dan.com for the sum of USD 950, a sum which likely far exceeds the out-of-pocket registration costs for the disputed domain name. Such use of a domain name can never be considered use in good faith.

The Panel is convinced that the evidence shown proves that the Respondent was targeting the Complainant and its trademark when registering the disputed domain name. 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 name <isclinical.online> be transferred to the Complainant.

The proceeding is dismissed regarding the disputed domain name <isclinical.xyz>, without prejudice to the filing of new complaint regarding this disputed domain name.

/Jonathan Agmon/

Jonathan Agmon

Sole Panelist

Date: June 26, 2025