

ADMINISTRATIVE PANEL DECISION

L'Oréal v. nan chen, tao zhang, chen chang long, zhou pei chao, xu xiao jiao
Case No. D2025-1718

1. The Parties

The Complainant is L'Oréal, France, represented by Dreyfus & associés, France.

The Respondents are nan chen, China, tao zhang, Hong Kong, China, chen chang long, China, zhou pei chao, China, and xu xiao jiao, China.

2. The Domain Names and Registrar

The disputed domain names <lancomebet-a.com>, <lancomebet-app.com>, <lancomebetapp.com>, <lancomebetbet.com>, <lancomebetcom.com>, <lancomebet-w.com>, <lancomebetw.com>, <lancomebet1-br.com>, and <w2-lancomebet.com> are registered with Dominet (HK) Limited (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 29, 2025. On April 29, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On April 30, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which partially differed from the named Respondents (nan chen, tao zhang) and contact information in the Complaint.

The Center sent an email communication to the Complainant on May 3, 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 domain names are under common control. The Complainant filed the amended Complaints respectively on May 6 and 7, 2025.

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 May 13, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 2, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on June 7, 2025.

The Center appointed William F. Hamilton as the sole panelist in this matter on June 17, 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.

On June 19, 2025, the Complainant requested addition of the domain names <lancomebetvip.com>, <lancomebets.com>, <lancomebet-bet.com>, and <lancomebeta.com> into the proceeding. On June 25, 2025, the Complainant requested addition of the domain names <lancomebets1.com>, <lancomebet-bet-br.com>, and <lancomebetx1.com> into the proceeding. On June 26, 2025, the Complainant requested addition of the domain name <lancomebet-com.com> into the proceeding.

4. Factual Background

The Complainant is a French industrial group specializing in cosmetics and beauty. The Complainant has a portfolio of 37 brands, employs 86,000 employees, and is present in 150 countries. L'Oreal China is a subsidiary of L'Oréal. Lancôme is one of the Complainant's brands and sells a range of skincare, make-up, and fragrance products.

The Complainant owns numerous LANCÔME (the "Mark") trademark registrations around the world, including but not limited to the following:

- Chinese trademark LANCÔME No. 775926, dated January 14, 1995, duly renewed and covering services in class 42;
- International trademark LANCOME No. 1679731, dated June 1, 2022, covering goods and services in classes 3, 9, 35 and 41;
- United States of America ("United States") trademark LANCOME No. 7453776, dated July 23, 2024, covering goods and services in classes 3, 9, 35 and 41; and
- United States trademark LANCÔME No. 425129, dated November 5, 1946, duly renewed and covering goods in class 3.

The Complainant operates a website at <lancome.com>, which was registered on July 8, 1997.

The disputed domain names were registered on the following dates:

- <w2-lancomebet.com> was registered on March 5, 2025;
- <lancomebet1-br.com> was registered on March 6, 2025;
- <lancomebetcom.com> was registered on March 10, 2025;
- <lancomebetbet.com> was registered on March 30, 2025;
- <lancomebetw.com> was registered on March 3, 2025;
- <lancomebet-w.com> was registered on February 28, 2025;
- <lancomebet-app.com> was registered on March 2, 2025;
- <lancomebetapp.com> was registered on March 2, 2025; and
- <lancomebet-a.com> was registered on February 27, 2025.

The disputed domain names resolve to online sports and casino gambling websites. Access to some of the websites is preceded by phishing alerts or warnings from browsers or search engines. All the websites have a similar look and feel and highlight the Mark. As discussed in section 6.1.B. below of this Decision, the individual Respondents will be collectively referred to as "the Respondent".

5. Parties' Contentions

A. Complainant

The Complainant contends that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant further contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain names.

Notably, the Complainant argues that the disputed domain names are confusingly similar to its Mark because the Mark is clearly identifiable within the disputed domain names. The Complainant maintains that the Respondent has no rights or legitimate interests in the disputed domain names and there is no evidence suggesting that the Respondent is commonly known by those names. Additionally, the Complainant contends that the Respondent is neither a licensee of the Complainant nor affiliated with the Complainant in any way. Furthermore, the Complainant claims that it has not authorized the Respondent to use the Mark. Moreover, the Complainant argues that the disputed domain names were registered and used in bad faith for commercial gain, misleading Internet users into believing that the Complainant has endorsed, is associated with, or sponsors the Respondent's websites and their content.

B. Respondent

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

6. Discussion and Findings

6.1 Procedural Issues

A. Addition of Domain Names after the Commencement of Proceeding

The Rules do not explicitly provide for a complaint to be amended after the commencement of proceeding to include additional domain names. Accordingly, requests for addition of domain names to a complaint after it has been notified to the respondent and the proceedings have formally commenced would be addressed by the panel on appointment.

As regards the Complainant's request for addition of the domain names, the Panel notes:

- The additional domain names were registered with the same Registrar "Dominet (HK) Limited" in June 2025, except for <lancomebet-com.com> which was registered on May 30, 2025;
- The additional domain names resolve to websites with similar look and feel as the websites at the disputed domain names included in the initial Complaint.

In addressing the Complainant's request, the Panel refers to paragraph 4.12.2 of WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)") which states that "[...] panels are generally reluctant to accept such requests because the addition of further domain names would delay the proceedings (which are expected to take place with due expedition). Moreover, a panel declining such request would not prevent the filing of a separate complaint where such additional domain names may be addressed".

While recognizing that the additional domain names closely resemble those disputed domain names currently under consideration and acknowledging that their registration may indicate bad faith on the part of the Respondent, the Panel notes that incorporating these domain names into the present proceeding would necessitate procedural steps that would substantially delay resolution. Specifically, the addition of new domain names would require fresh notifications, requests for registrar verification, and potentially complex procedural consolidation, delaying the relief sought by the Complainant.

Furthermore, the Panel considers that granting the amendment could inadvertently incentivize the Respondent to continue registering similar domain names, thereby causing perpetual delays and continuing harm to the Complainant's trademark interests.

Accordingly, the Panel determines that procedural efficiency and fairness are best served by declining the request to amend the Complaint to include the additional domain names. The Complainant is at liberty to file a separate complaint addressing the additional domain names.

Therefore, the Complainant's request to amend the Complaint to include the additional domain names is denied.

B. 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 3.0](#), section 4.11.2.

As regards common control, the Panel notes:

- The composition of the disputed domain names is similar. They all feature the Mark combined with various short dictionary or industry terms and abbreviations, such as "bet" (indicating betting), "app" (indicating an application), "br" (indicating Brazil), and "com" (a Top-Level Domain), the letter "w", and the numerical terms "1" and "2".
- All the disputed domain names were registered via the same Registrar Dominet (HK) Limited in February and March, 2025.
- All the disputed domain names resolve to online sports and casino gambling websites.
- All the disputed domain names resolve to websites with a similar look and feel, containing references to the Mark, and soliciting user "registration".

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 (herein referred to as "the Respondent") in a single proceeding.

6.2 Substantive Issues

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 to the Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds that 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 3.0](#), section 1.7.

Although the addition of terms and letters in the disputed domain names may bear on the assessment of the second and third elements, the Panel finds the addition of the terms and letters within the disputed domain names 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.

Accordingly, the Panel finds that the disputed domain names are confusingly similar to the Mark for the purposes of the Policy.

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.

The Respondent’s use of the disputed domain names to resolve to sports and casino gambling websites does not, in and of itself, create any rights or legitimate interests in the disputed domain names. Under the facts and circumstances of this case, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain names.

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

C. Registered and Used in Bad Faith

Under paragraph 4(b) of the Policy, bad faith may be established by any one of the following scenarios:

(i) circumstances indicating that the respondent has registered or acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of the respondent’s documented out-of-pocket costs directly related to the domain name; or

(ii) the respondent has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that the respondent has engaged in a pattern of such conduct; or

(iii) the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the respondent's website or location or of a product or service on the respondent's website or location.

The Panel finds that the Respondent was aware of the Complainant's Mark and its associated goodwill when registering the disputed domain names. The Complainant's Mark is well-known. It is implausible that the Respondent innocently created nine disputed domain names and the websites prominently incorporating the Mark surrounded by essentially meaningless terms, numbers, abbreviations, and letters in a two-month period. There is no indication that the content or activity on the Respondent's gambling websites would have suggested using the Mark in the composition of the disputed domain names. The Respondent has intentionally attempted to attract Internet users to its websites using the disputed domain names for commercial gain by creating a likelihood of confusion as to whether the Complainant has sponsored, is affiliated with, or endorsed the Respondent's websites. WIPO panels have determined that the incorporation of a well-known trademark, such as the Complainant's Mark, in its entirety may be sufficient to establish that the domain name is identical or confusingly similar to a complainant's trademark. See e.g. *L'Oréal, Lancôme Parfums Et Beauté & Cie v. Jack Yang*, WIPO Case No. [D2011-1627](#). In this case, the Mark is clearly recognizable in the disputed domain names and is likely to mislead Internet users into believing that the disputed domain names are endorsed, affiliated with, or sponsored by the Complainant.

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

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 <lancomebet-a.com>, <lancomebet-app.com>, <lancomebetapp.com>, <lancomebetbet.com>, <lancomebetcom.com>, <lancomebet-w.com>, <lancomebetw.com>, <lancomebet1-br.com>, and <w2-lancomebet.com> be transferred to the Complainant.

/William F. Hamilton/

William F. Hamilton

Sole Panelist

Date: June 27, 2025