

ADMINISTRATIVE PANEL DECISION

Mistral AI v. robert batam, Mistral AI
Case No. D2025-1802

1. The Parties

Complainant is Mistral AI, France, represented by Blanche Avocats, France.

Respondent is robert batam, Mistral AI, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <mistral-ai.org> is registered with Squarespace Domains II LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 6, 2025. On May 6, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 6, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Redacted for Privacy, Mistral AI) and contact information in the Complaint. The Center sent an email communication to Complainant on May 8, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on May 13, 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 Respondent of the Complaint, and the proceedings commenced on May 20, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 9, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on June 22, 2025.

The Center appointed Stephanie G. Hartung as the sole panelist in this matter on June 26, 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

Complainant is a company organized under the laws of France that is active in the artificial intelligence (AI) and software industry, specializing in developing and offering large language models (LLMs).

Complainant has provided evidence that it is the registered owner of various trademarks relating to its company name and brand MISTRAL AI, including, but not limited, to the following:

- word mark MISTRAL AI, European Union Intellectual Property Office (EUIPO), registration number: 018942618, registration date: February 14, 2024, status: active;
- word mark MISTRAL AI, International Registration (World Intellectual Property Organization (WIPO)), registration number: 1794809, registration date: December 15, 2023, status: active.

Moreover, Complainant has demonstrated to own several domain names relating to its MISTRAL AI trademark, inter alia, since 2019 the domain name <mistral.ai> which resolves to Complainant's main website at "www.mistral.ai", promoting Complainant's products and related services in the AI industry internationally.

Respondent, according to the registrar verification, is located in the United States. The disputed domain name was registered on August 14, 2024, and resolves to an "Under Construction" website at "www.mistral-ai.org", which is still redirecting – through a small link placed in the homepage's upper left corner – Internet users to a commercially active website operated by the Registrar at "www.squarespace.com", offering website, software and AI services.

Complainant requests that the disputed domain name be transferred to Complainant.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name. Notably, Complainant contends to be the European leader in generative AI that was founded in early 2023 and enjoyed quick and significant success by fundraising hundreds of millions of euros in 2023 and 2024, meanwhile enjoying high and worldwide reputation.

Complainant submits that the disputed domain name is confusingly similar to Complainant's MISTRAL AI trademark, as it fully reproduces the latter as well as Complainant's company name and domain names. Moreover, Complainant asserts that Respondent has no rights or legitimate interests in respect of the disputed domain name since (1) Complainant has never authorized Respondent to register and/or use the disputed domain name, and Respondent has no link whatsoever with Complainant and is totally unknown by it, (2) Respondent itself apparently does not own any MISTRAL AI or similar trademarks, (3) there is no reason for Respondent to justify choosing the word "mistral ai" other than misleading the public and free riding Complainant's reputation and investments, and (4) the website under the disputed domain name appears to be inactive, confirming that it was not registered to be legitimately exploited, but for cybersquatting and other fraudulent purposes. Finally, Complainant argues that Respondent has registered and is using the disputed domain name in bad faith since (1) Complainant's MISTRAL AI trademark has been enjoying a worldwide reputation since its creation in 2023, widely relayed by the media, which is why Respondent at the time of registering the disputed domain name knew about Complainant and sought to take unfair advantage of the latter's reputation, investments, and Internet referencing, (2) the website under the disputed domain name displays Complainant's MISTRAL AI trademark in the center of its homepage and is still under construction, proving that the disputed domain name was only registered for cybersquatting purposes, not to be legitimately exploited, and (3) Respondent appears to be fraudulently impersonating Complainant's identity, as the disputed domain name was registered under the name of a Californian

company “Mistral AI” which is totally unknown to Complainant, does not correspond to any real entity and is using the address of the web hosting provider Cloudflare, thus hiding Respondent’s real address.

B. Respondent

Respondent did not reply to Complainant’s contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, Complainant carries the burden of proving:

- (i) that the disputed domain name is identical or confusingly similar to a trademark or service mark in which Complainant has rights; and
- (ii) that Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) that the disputed domain name has been registered and is being used in bad faith.

Respondent’s default in the case at hand does not automatically result in a decision in favor of Complainant, however, paragraph 5(f) of the Rules provides that if Respondent does not submit a response, in the absence of exceptional circumstances, the Panel shall decide the dispute solely based upon the Complaint. Further, according to paragraph 14(b) of the Rules, the Panel may draw such inferences from Respondent’s failure to submit a Response as it considers appropriate.

A. Identical or Confusingly Similar

First, 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 Complainant’s MISTRAL AI 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.

Complainant has shown rights in respect of its MISTRAL AI trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. Also, the entirety of such trademark is reproduced within the disputed domain name, without any additions except for a hyphen. Accordingly, the disputed domain name is at least confusingly similar, if not nearly identical to Complainant’s MISTRAL AI trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel, therefore, finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Second, paragraph 4(c) of the Policy provides a list of circumstances in which 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 Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted 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.

Respondent has not been authorized to use Complainant's MISTRAL AI trademark, either as a domain name or in any other way. Also, notwithstanding Respondent's organization name, there is no evidence that Respondent is commonly known by the disputed domain name. Moreover, Respondent does not appear to have any trademark rights associated with the terms "mistral" and/or "ai" on its own. At first glance, the disputed domain name only resolves to a typical "Under Construction" website at "www.mistral-ai.org", meaning – and as argued by Complainant – it would be passively held. At second glance, Internet users – by clicking on a small link placed in the homepage's upper left corner – are redirected to a commercially active website operated by the Registrar at "www.squarespace.com", offering e.g., website, software and AI services without any reference being made to Complainant or its MISTRAL AI trademark whatsoever. While the website at the disputed domain name may be a standard hosting page provided by the Registrar, Respondent, as registrant of the disputed domain name, is ultimately responsible for the use of the disputed domain name and the content contained therein. Such use of the disputed domain name, in any event, quite obviously neither qualifies as bona fide nor as legitimate noncommercial or fair within the meaning of paragraph 4(c) of the Policy.

The Panel, therefore, finds that Respondent has no rights or legitimate interests in respect of the disputed domain name and that, therefore, the second element of the Policy has been established, too.

C. Registered and Used in Bad Faith

Third, 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.

It is undisputed between the Parties that Complainant and its MISTRAL AI trademark due to quick and significant success since their introduction in 2023 meanwhile enjoy significant reputation worldwide, allowing to conclude that it is more likely than not that Respondent knew of Complainant and its trademark when registering the disputed domain name (which is nearly identical thereto), and that the disputed domain name is directly targeting such reputed trademark. The fact that Respondent registered the disputed domain name under the organization name "Mistral AI", which bears no connection to Complainant and does not appear to correspond to any real entity, is further evidence of targeting Complainant's brand and trademark. Under the assumption, and as argued by Complainant, that the disputed domain name only resolves to a typical "Under Construction" website at "www.mistral-ai.org" and, therefore, is only passively held, UDRP 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. Having reviewed the available record, the Panel notes e.g., the distinctiveness or reputation of Complainant's MISTRAL AI trademark, and the composition of the disputed domain name, which is nearly identical thereto, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy. Realizing, however, that Internet users – by clicking on a small link placed in the homepage's upper left corner – are further redirected to a commercially active website operated by the Registrar at "www.squarespace.com", offering e.g., website, software and AI services without any reference being made to Complainant or its MISTRAL AI trademark whatsoever, but still competing with Complainant's business in the AI and software industry, this allows the Panel to conclude that Respondent intentionally attempted to attract, for commercial gain, Internet users to its own website by creating a likelihood of confusion with Complainant's MISTRAL AI trademark as to the source, sponsorship, affiliation or endorsement of Respondent's website. Such circumstances are evidence of registration and use of the disputed domain name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

The Panel, therefore, finds that Complainant has established the third element of the Policy, too.

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, <mistral-ai.org>, be transferred to Complainant.

/Stephanie G. Hartung/

Stephanie G. Hartung

Sole Panelist

Date: July 10, 2025