

ADMINISTRATIVE PANEL DECISION

L'Oréal v. plywooddark eyed, Sophie, Sophie
Case No. D2025-2301

1. The Parties

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

The Respondents are plywooddark eyed, Japan and Sophie, Sophie, United States of America.

2. The Domain Name and Registrar

The first disputed domain name <lancomeusdt.vip> is registered with Dynadot Inc, the second disputed domain name <lancomecryptocurrency.vip> with Dominet (HK) Limited, (together referred to as the "Registrars").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 12, 2025. On June 12, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 13, 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 (Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 16, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on June 17, 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 Respondent ("first Respondent") of the Complaint, and the proceedings commenced on June 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 8, 2025. The first Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 9, 2025.

On June 20, 2025 the Complainant filed a further amended Complaint requesting addition of the domain name <lancomecryptocurrency.vip> (second disputed domain name) to the dispute and consolidation of proceedings. The Complainant sent this further amended Complaint and consolidation request by email directly to the Center and the first Respondent.

The Center appointed Tobias Malte Müller as the sole panelist in this matter on July 14, 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 July 28, 2025 the Center forwarded the notification of the Complaint, the Complainant's submission of the amended Complaint with annexes and the Complainant's submission of the second amended Complaint with annexes, to the Respondent Sophie, Sophie ("second Respondent") the registrant of the second disputed domain name, as confirmed by the concerned Registrar in reply to a request for registrar verification by the Center. Furthermore, the second Respondent has been invited to indicate whether or not it would like to participate in the current proceeding and submit any comments on the documents forwarded by the Center by August 11, 2025. Furthermore, the decision due date has been extended to August 21, 2025.

The second Respondent has not submitted any response.

4. Factual Background

The Complainant's undisputed statements confirm that it is a French industrial group specialized in the field of cosmetics and beauty and is the first cosmetics group worldwide. It has a portfolio of 37 brands, employs 86,000 employees, and is present in 150 countries.

Furthermore, the evidence before the Panel proves that the Complainant is the registered owner of portfolio of registered trademarks containing or consisting of the verbal element "LANCÔME", including the following trademarks:

- International trademark "LANCÔME" No. 157412 registered on November 12, 1951, covering goods and services notably in classes 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34;
- United States trademark "LANCOME" No. 7453776 registered in the principal Register on July 23, 2024, and covering goods and services in classes 3, 9, 35 and 41.

These marks are in force.

The disputed domain names have been registered as follows:

- <lancomeusdt.vip> on May 14, 2025;
- <lancomecryptocurrency.vip> on June 16, 2025.

It results from the Complainant's documented allegations, which remained uncontested, that the disputed domain names originally directed to the same login page, reproducing the Complainant's trademark and visuals, without authorization, and requesting users' sensitive personal data. In addition, the platform "lancomeusdt.vip" was promoted on Telegram and WhatsApp and appears to be involved in potentially illegal cryptocurrency-related activities.

Between the end of May and June 20, 2025, the Complainant sent several notifications and reminders to the Registrars and hosting provider, requesting the blocking of the disputed domain names and deactivation of the corresponding websites. However, the Complainant did not receive any satisfying response.

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:

(1) the complaints for the two disputed domain names should be consolidated. The evidence suggests that the Registrants of the disputed domain names appear to be the same person or to be subject to common control for the following reasons: (i) the composition of the disputed domain names is virtually identical, (ii) both were registered closely apart from each other (between May 14 and June 16, 2025) and (iii) both disputed domain names originally directed to the same fraudulent page reproducing the Complainant's trademark and logo, soliciting users' sensitive personal information;

(2) The disputed domain names reproduce Complainant's trademark in its entirety and associate it with the acronym "USDT", a crypto currency that stands for United States Dollar Tether ("USD Tether"), and the term "cryptocurrency". They, therefore, create a misleading association between Complainant and the cryptocurrency sector and are as such at least confusingly similar to the Complainant's trademark LANCÔME and the official domain name;

(3) The disputed domain names are not used in any type of legitimate business or services. The Respondents appear to engage these domain names for a phishing scheme, namely, a phishing platform using the LANCÔME logo and brand. The platform, named "lancomeusdt.vip", is promoted on Telegram and WhatsApp and appears to be involved in potentially illegal cryptocurrency-related activities. Said activities are perpetuated on the further disputed domain name <lancomecryptocurrency.vip>;

(4) The Complainant's trademark LANCÔME is well-known throughout the world and significantly predate the registration date of the disputed domain names. The Respondents' fraudulent behavior, consisting in setting up the same fraudulent site on the disputed domain name <lancomecryptocurrency.vip> initially configured on <lancomeusdt.vip>, and deactivated following the Complainant's actions is proof of Respondents' bad faith. Furthermore, in the absence of any license or permission from the Complainant to use such widely known trademarks, no actual or contemplated bona fide or legitimate use of the disputed domain names could reasonably be claimed.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to "decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable". Paragraph 4(a) of the Policy requires a complainant to prove each of the following three elements in order to obtain an order that disputed domain name be transferred or cancelled:

(i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and

(ii) the Respondents have no rights or legitimate interests in respect of the disputed domain names; and

(iii) the disputed domain names have been registered and are being used in bad faith.

The Panel will therefore proceed to analyze whether the three elements of paragraph 4(a) of the Policy are satisfied. Before doing so, however, the Panel will address the consolidation.

Consolidation: Multiple Respondents

The further amended Complaint was filed in relation to two nominally different domain name registrants. The Complainant alleges that these two domain name registrants are the same person or under common control. The Complainant therefore requests the consolidation of the Complaint against the two disputed domain name registrants pursuant to paragraph 10(e) of the Rules. This request has been notified to the Center and the first Respondent on June 20, 2025, after the Center had formally notified the first Respondent of the Complaint, and the commencement of the proceedings on June 18, 2025.

Therefore, on July 28, 2025 the Panel forwarded the notification of the Complaint, the Complainant's submission of the amended Complaint with annexes, and the Complainant's submission of the second amended Complaint with annexes, to the second Respondent, the registrant of the second disputed domain name <lancomecryptocurrency.vip>. Additionally, the second Respondent has been invited to indicate whether or not it would like to participate to the current proceeding and submit any comments on the documents forwarded by the Center by August 11, 2025. Furthermore, the decision due date has been extended to August 21, 2025.

However, none of the disputed domain name registrants commented 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 set forth in section 4.11.2 of [WIPO Overview 3.0](#): "Panels have considered a range of factors, typically present in some combination, as useful to determining whether such consolidation is appropriate, such as similarities in or relevant aspects of (i) the registrants' identity(ies) including pseudonyms, (ii) the registrants' contact information including email address(es), postal address(es), or phone number(s), including any pattern of irregularities, (iii) relevant IP addresses, name servers, or webhost(s), (iv) the content or layout of websites corresponding to the disputed domain names, (v) the nature of the marks at issue (e.g., where a registrant targets a specific sector), (vi) any naming patterns in the disputed domain names (e.g., <mark-country> or <mark-goods>), (vii) the relevant language/scripts of the disputed domain names particularly where they are the same as the mark(s) at issue, (viii) any changes by the respondent relating to any of the above items following communications regarding the disputed domain name(s), (ix) any evidence of respondent affiliation with respect to the ability to control the disputed domain name(s), (x) any (prior) pattern of similar respondent behavior, or (xi) other arguments made by the complainant and/or disclosures by the respondent(s)."

As regards common control, the Panel notes the following factors:

- (i) the disputed domain names share the same naming pattern, featuring the Complainant's trademark LANCÔME in its entirety, associated with the terms "cryptocurrency" and the acronym "usdt" under the generic Top-Level Domain (gTLD) ".vip";
- (ii) the disputed domain names were both registered closely to each other, between May 14 and June 16, 2025;
- (iii) the disputed domain names were both used to direct to the same fraudulent page reproducing the Complainant's trademark and logo, soliciting users' sensitive information.

On the balance of probabilities and taking into account the above circumstances of the present case, the Panel finds that the disputed domain names are under common control.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. Both Respondents have been given the opportunity to comment on the foregoing and have elected not to file a response or to provide any explanation. In particular, the Respondents failed to come forward with any allegations or evidence to object the consolidation.

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 of WIPO Panel Views on Selected UDRP Questions, Third Edition, ([“WIPO Overview 3.0”](#)), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark LANCÔME for the purposes of the Policy, [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the mark is reproduced within the disputed domain names and placed at the beginning of these domain names. Therefore, the Panel finds the mark is recognizable within the disputed domain names so that the latter are confusingly similar to the mark for the purposes of the Policy, [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms, here, “usdt” and “cryptocurrency”, 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 names and the mark for the purposes of the Policy, [WIPO Overview 3.0](#), 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 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 have 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.

Furthermore, the Panel notes that the disputed domain names direct(ed) to the same login page, reproducing the Complainant's trademark and visuals, without authorization, and requesting users' sensitive personal data. The Respondent appears to engage the disputed domain names for a phishing scheme, namely, a phishing platform using the LANCÔME-logo. In addition, the platform "lancomeusdt.vip" is promoted on Telegram and WhatsApp and appears to be involved in potentially illegal cryptocurrency-related activities. The Panel finds it most likely that the Respondent selected the disputed domain names with the intention to take advantage of the Complainant's trademarks by registering disputed domain names identically containing said trademarks. Such use can neither be considered a bona fide offering of goods or services nor a legitimate noncommercial or fair use of the disputed domain names, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue in the sense of paragraph 4(c)(i) and (iii) of the Policy.

In addition, the Respondent did not submit any evidence of bona fide pre-Complaint preparations to use the disputed domain names. As outlined above, the Complainant's uncontested allegations demonstrate that it has not authorized the Respondent's use of its trademarks for registering the disputed domain names, which are confusingly similar.

Finally, the Panel notes that there is no evidence in the record that could lead to the conclusion that the Respondents might be commonly known by the disputed domain names in the sense of paragraph 4(c)(ii) 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 particular, Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith, [WIPO Overview 3.0](#), section 3.2.1. One of these circumstances is that the Respondent, by using the disputed domain names, has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of its website or location or of a product or service on its website or location (paragraph 4(b)(iv) of the Policy).

In the present case, the Panel notes that the disputed domain names direct(ed) to the same login page, reproducing the Complainant's trademark and visuals, without authorization, and requesting users' sensitive, personal data. The Respondent appears to engage the disputed domain names for a phishing scheme, namely, a phishing platform using the LANCÔME logo. In addition, the platform "lancomeusdt.vip" is promoted on Telegram and WhatsApp and appears to be involved in potentially illegal cryptocurrency-related activities. For the Panel, it is therefore evident that the Respondent positively knew the Complainant's trademark. Consequently, and in the absence of any evidence to the contrary, the Panel is convinced that the Respondent also knew that the disputed domain names included the Complainant's trademark when it registered the disputed domain names.

In this regard, the further circumstances surrounding the disputed domain names' registration and use confirm the findings that the Respondent has registered and is using the disputed domain names in bad faith:

- (i) the nature of the disputed domain names identically incorporating the Complainant's well-known trademark, which significantly predate the registration date of the disputed domain names;
- (ii) no actual or contemplated bona fide or legitimate use of the disputed domain names can reasonably be inferred, particularly in light of the Complainant's trademark reputation, the absence of any license or authorization granted to the Respondent and the Respondent's failure to provide any explanation for its registration or use of the disputed domain names;
- (iii) the content of the websites to which the disputed domain names direct, displaying the Complainant's trademark and visuals and requesting users to disclose sensitive personal data;
- (iv) a clear absence of rights or legitimate interests coupled with no response for the Respondent's choice of the disputed domain names; and
- (v) the fact that the details disclosed for the Respondent by the Registrars are incomplete, noting the courier's inability to deliver the Center's Written Notices to Respondent.

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 <lancomeusdt.vip> and <lancomecryptocurrency.vip> be transferred to the Complainant.

/Tobias Malte Müller/

Tobias Malte Müller

Sole Panelist

Date: August 21, 2025