

## **ADMINISTRATIVE PANEL DECISION**

Compagnie Générale des Etablissements Michelin v. Eason chen  
Case No. D2025-2485

### **1. The Parties**

Complainant is Compagnie Générale des Etablissements Michelin, France, represented by Dreyfus & associés, France.

Respondent is Eason chen, United States of America (“United States”).

### **2. The Domain Name and Registrar**

The disputed domain name <ai-michelin.com> is registered with Hostinger Operations, UAB (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 24, 2025. On June 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 26, 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 (Domain Admin) and contact information in the Complaint. The Center sent an email communication to Complainant on June 26, 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 June 27, 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 July 1, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 21, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on July 22, 2025.

The Center appointed Cristian, L. Calderón Rodríguez as the sole panelist in this matter on July 24, 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 Compagnie Générale des Etablissements Michelin (“Michelin”), a leading tire company, which is dedicated to enhancing its clients’ mobility, sustainably, designing and distributing the most suitable tires, services and solutions for its clients’ needs, providing digital services, maps and guides to help enrich trips and travels and make them unique experiences, and developing high technology materials that serve the mobility industry.

Michelin North America is a USD 8.1 billion dollar a year company operating 34 plants in 2 countries and employs 23,000 people. It manufactures and sells tires for airplanes, automobiles, farm equipment, heavy duty trucks, motorcycles, and bicycles. Michelin manufactures tires in six states: Alabama, Indiana, Ohio, Oklahoma, North Carolina and South Carolina. In addition, there are three plants in Nova Scotia, Canada and one plant in Queretaro, Mexico.

Headquartered in Clermont-Ferrand, France, Michelin is present in 170 countries, has more than 124,000 employees and operates 117 tire manufacturing facilities and sales agencies in 26 countries.

Complainant owns a large portfolio of trademarks including the wording MICHELIN in several jurisdictions, such as:

- International Trademark MICHELIN No. 771031, designating among others China, Egypt, Morocco, Russian Federation, Singapore, dated June 11, 2001, duly renewed and covering goods and services in classes 5, 7, 8, 9, 10, 11, 12, 16, 17, 18, 20, 21, 24, 25, 39, 42;
- United States trademark MICHELIN No. 4126565, dated April 10, 2012, duly renewed and covering services in classes 36, 37 and 39;
- United States trademark MICHELIN No. 892045, dated June 2, 1970, duly renewed and covering goods in class 12;
- United States trademark MICHELIN No. 3329924, dated November 6, 2007, duly renewed, for services in class 39;
- European Union trademark MICHELIN No. 001791243, dated October 24, 2001, duly renewed and covering goods in classes 6, 7, 12, 17, 28.

In addition, Complainant is notably the owner of the following domain name reflecting its trademarks, which it uses to promote its services:

- <michelin.com> registered on December 1, 1993.

The disputed domain name <ai-michelin.com> was registered on April 27, 2025 and it resolves to a website titled “AIMichelin”, promoting itself as an “AI-Powered FinTech Startup Evaluation Platform” offering financial, investment intelligence, and analysis platform services, among others.

#### **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 that the disputed domain name is confusingly similar to its trademark MICHELIN.

Complainant is well-known throughout the world, including the United States where Respondent is located. In this regard, many panels have previously acknowledged Complainant's reputation worldwide, making it unlikely that Respondent was not aware of Complainant's rights in the MICHELIN trademark (*Compagnie Générale des Etablissements Michelin v. Shuitu Chen*, WIPO Case No. [D2016-1924](#), *Compagnie Générale des Etablissements Michelin v. Isaac Goldstein, Hulmiho Ukolen, Poste restante/Domain Admin, Whois protection, this company does not own this domain name s.r.o.*, WIPO Case No. [D2015-1787](#)).

The addition of the letters "AI", meaning "artificial intelligence" in English, is not sufficient to avoid the likelihood of confusion. It is well-established that "a domain name that wholly incorporates a Complainant's registered trademark may be sufficient to establish confusing similarity for purposes of the UDRP". Please see (*Groupe Auchan v. Gan Yu*, WIPO Case No. [D2013-0188](#); *LEGO Juris A/S v. DomainPark Ltd, David Smith, Above.com Domain Privacy, Transure Enterprise Ltd, Host master*, WIPO Case No. [D2010-0138](#)).

Complainant further contends that Respondent has no rights nor legitimate interests in the disputed domain name and that it has been registered and used in bad faith.

Complainant's MICHELIN trademark registrations significantly predate the registration date of the disputed domain name. A quick MICHELIN trademark search would have revealed to Respondent the existence of Complainant and its trademark. Respondent's failure to do so is a contributory factor to its bad faith (*Lancôme Parfums et Beauté & Cie, L'Oréal v. 10 Selling*, WIPO Case No. [D2008-0226](#)).

## **B. Respondent**

Respondent did not reply to Complainant's contentions.

## **6. Discussion and Findings**

### **A. Identical or Confusingly Similar**

Complainant states that the disputed domain name <ai-michelin.com> is confusingly similar to its trademark MICHELIN. Indeed, it includes it in its entirety.

The addition of the letters "ai", meaning "artificial intelligence" does not prevent a finding of confusing similarity. It is well-established that "a domain name that wholly incorporates a Complainant's registered trademark may be sufficient to establish confusing similarity for purposes of the UDRP".

The Panel finds the first element of the Policy has not been established.

### **B. Rights or Legitimate Interests**

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.

Firstly, Complainant is well-known throughout the world, including the United States where Respondent is located (Annexes 3 and 4 of the Complaint). In this regard, many panels have previously acknowledged Complainant's reputation worldwide, making it unlikely that Respondent was not aware of Complainant's rights in the MICHELIN trademark (*Compagnie Générale des Etablissements Michelin v. Shuitu Chen*, WIPO Case No. [D2016-1924](#), *Compagnie Générale des Etablissements Michelin v. Isaac Goldstein, Hulmiho Ukolen, Poste restante/Domain Admin, Whois protection, this company does not own this domain name s.r.o.*, WIPO Case No. [D2015-1787](#)).

Secondly, considering the composition of the disputed domain name entirely reproduces Complainant's trademark MICHELIN associated to the abbreviation "ai", it is impossible that Respondent did not have Complainant's trademark and company name in mind while registering the disputed domain name. Therefore, Respondent probably registered the disputed domain name <ai-michelin.com> based on the notoriety and attractiveness of Complainant's trademark to divert Internet users to its website generating revenue.

Hence, it is inconceivable that Respondent did not have Complainant's trademark in mind at the time of registration of the disputed domain name.

Consequently, in view of the abovementioned circumstances, the second element of the Policy has been established.

### **C. Registered and Used in Bad Faith**

Some elements may be put forward to support the finding that Respondent also uses the domain name in bad faith.

Previous panels have considered that in the absence of any license or permission from Complainant to use such widely known trademark, no actual or contemplated bona fide or legitimate use of the domain name could reasonably be claimed (*Alstom, Bouygues v. Webmaster*, WIPO Case No. [D2008-0281](#); *Guerlain S.A. v. Peikang*, WIPO Case No. [D2000-0055](#)).

As the disputed domain name is confusingly similar to Complainant's trademark, previous panels have ruled that "a likelihood of confusion is presumed, and such confusion will inevitably result in the diversion of Internet traffic from Complainant's site to Respondent's site" (*MasterCard International Incorporated ("MasterCard") v. Wavepass AS*, WIPO Case No. [D2012-1765](#); *Edmunds.com, Inc. v. Triple E Holdings Limited*, WIPO Case No. [D2006-1095](#)).

The disputed domain name resolves to a website titled "AI-Michelin", promoting itself as an "AI-Powered FinTech Startup Evaluation Platform." The site offers financial, investment intelligence, and analysis platform services, among others. Such use of the domain name demonstrates Respondent's intention to abusively benefit from Complainant's reputation and particularly from the latter's trademarks to obtain commercial gains from the proposed online financial platform. Thus, Internet users could reasonably believe that, in some way, the disputed domain name is endorsed by Complainant and may constitute a misleading association with artificial intelligence offerings purportedly linked to Complainant.

Therefore, the disputed domain name <ai-michelin.com> was registered and is being used in bad faith.

## 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 <ai-michelin.com> be transferred to Complainant.

*/Cristian L. Calderón Rodríguez/*  
**Cristian L. Calderón Rodríguez**  
Sole Panelist  
Date: August 7, 2025