

ADMINISTRATIVE PANEL DECISION

Laboratoires M&L v. Zhichao
Case No. D2025-2680

1. The Parties

The Complainant is Laboratoires M&L, France, represented by IP Twins, France.

The Respondent is Zhichao, China.

2. The Domain Names and Registrar

The disputed domain names <comloccitane.com>, <lcocitane.com>, <lociitane.com>, <loccirane.com>, <loccitaane.com>, <loccitabe.com>, <loccittane.com>, <locciyane.com>, <loccltane.com>, <locctiane.com>, <loccutane.com>, <locictane.com>, <locvitane.com>, <locxitane.com>, <lovcitane.com>, and <loxcitane.com> are registered with Dynadot Inc (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 8, 2025. On July 8, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 9, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names 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 July 10, 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 July 10, 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 of the Complaint, and the proceedings commenced on July 17, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 6, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 7, 2025.

The Center appointed Kathryn Lee as the sole panelist in this matter on August 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 part of the L'Occitane Group, a global natural and organic ingredient-based cosmetics and well-being products manufacturer and retailer. In 2020, the L'Occitane Group had 3,486 retail locations and 9,000 employees worldwide, and its revenues in 2024 were USD 2.5 billion. The Complainant holds a number of trademarks for the L'OCCITANE mark including the International Trademark Registration Number 1006051 registered on October 8, 2008, and International Trademark Registration Number 579875 registered on November 5, 1991.

The Respondent appears to be an individual or an entity with an address in China.

The disputed domain names were all registered on July 3, 2025, and at the time of filing the Complaint all of the disputed domain names resolved to websites indicating "No valid delivery channels available for this domain". At the time of this Decision, the disputed domain names are connected to websites displaying pay-per-click ("PPC") links to terms such as "natural skincare products", "luxury body care", "anti aging face cream", "l'occitane en provence", "l'occitane products", "private equity directs", "golden care insurance switzerland", and for "mercedes benz".

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for transfer of the disputed domain names.

Notably, the Complainant contends that the disputed domain names are all similar to the point of confusion with the Complainant's L'OCCITANE mark and that the small changes of letters are minor differences that do not prevent a finding of confusing similarity.

The Complainant also contends that the Respondent has no rights or legitimate interests in the disputed domain names and confirms that it has not authorized or licensed rights to the Respondent in any respect. The Complainant further contends that there is no evidence of the Respondent's use of, or demonstrable preparations to use the disputed domain names in providing any bona fide offering of goods or services, nor any evidence that the Respondent has been commonly known by the disputed domain names, or a legitimate noncommercial or fair use of the disputed domain names by the Respondent. The Complainant also contends that the disputed domain names resolved to websites indicating "No valid delivery channels available for this domain". Nevertheless, the Complainant argued that the Respondent is making preparations to use all disputed domain names as parking pages with PPC links which is used to obtain commercial gain by misleadingly diverting consumers.

Finally, the Complainant contends that the disputed domain names were registered and are being used in bad faith. The Complainant contends that given the fame of the L'OCCITANE mark, it is unlikely for the Respondent to have been unaware of the Complainant and its mark and that the misspellings in the disputed domain names indicate the Respondent's intent to give the impression that they are associated with the Complainant. For this reason, the Complainant contends that the disputed domain names were registered to take unfair advantage due to their confusing similarity to the trademark owned by the Complainant, and that the use of the disputed domain names to display PPC links supports a finding of bad faith on the part of the Respondent. The Complainant also contends that the Respondent is a notorious cybersquatter with a number of negative UDRP domain name decisions against him.

B. Respondent

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

6. Discussion and Findings

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

The Panel finds the mark is recognizable within all the disputed domain names since the disputed domain names incorporate typosquatted versions of the Complainant's L'OCCITANE trademark, except for the disputed domain name <comloccitane.com>, which includes the Complainant's mark in its entirety.

The disputed domain names <lociitane.com>, <loccitaane.com>, and <loccittane.com> are all confusingly similar to the L'OCCITANE mark with the addition of an additional letter. As for disputed domain names <lococitane.com>, <locctiane.com> and <locictane.com>, they are also each confusingly similar to L'OCCITANE except that each has two adjacent letters that are transposed. And lastly, the disputed domain names <loccirane.com>, <loccitabe.com>, <locciyane.com>, <loccltane.com>, <loccutane.com>, <locvitane.com>, <locxitane.com>, <lovcitane.com>, and <loxcitane.com> are also confusingly similar to L'OCCITANE, they each have one letter that is replaced with a different letter. These differences do not affect confusing similarity, as the Complainant's mark remains recognizable.

These are cases of typosquatting, and previous UDRP panels have concluded that a domain name that consists of an intentional misspelling of a trademark, such as use of an adjacent keyboard letter and the addition or interspersion of other terms or numbers, is considered confusingly similar to the relevant trademark for the purposes of the first element. See [WIPO Overview 3.0](#), section 1.9.

Accordingly, the disputed domain names are confusingly similar 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 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.

Further, the Respondent is displaying PPC links at the websites linked to the disputed domain names which do not represent a bona fide offering of goods or services as the links compete with or capitalize on the reputation and goodwill of the Complainant's mark or otherwise mislead Internet users. This is especially the case since many of the disputed domain names display links to goods of the Complainant's competitors. For instance, as of the date of the Decision, the websites at the disputed domain names <comloccitane.com>, <locciitane.com>, and <loccitaane.com> display links to natural skincare products, luxury body care, and anti-aging face cream which are the very goods of the Complainant.

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 Respondent has registered sixteen disputed domain names which are all variations of the famous L'OCCITANE mark of the Complainant, so the Respondent clearly was aware of the Complainant and its mark, and targeted the Complainant in registering the disputed domain names. Further, the typosquatting nature of the disputed domain names and their confusing similarity to the Complainant's mark creates a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4.

In addition, the Respondent has the disputed domain names to websites displaying PPC links to the goods of the Complainant's competitors, which shows that the Respondent intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark. Further, the Respondent did not respond to the Complaint and there is no conceivable good faith use for the Respondent's registration of the disputed domain names. And lastly, the Respondent has a history of bad faith domain name registration and use as evidenced by sixteen past WIPO decisions rendered against him (e.g., *The Depository Trust & Clearing Corporation v. Super Privacy Service LTD c/o Dynadot / Zhichao*, WIPO Case No. [D2020-0860](#); *Barracuda Networks, Inc. v. Zhichao*, WIPO Case No. [D2022-4659](#); *DispatchHealth Management, LLC v. Zhichao*, WIPO Case No. [D2023-4490](#); and *Fenix International Limited v. Zhichao*, WIPO Case No. [D2025-0806](#), etc.).

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 <comloccitane.com>, <lcocitane.com>, <locciitane.com>, <loccirane.com>, <loccitaane.com>, <loccitabe.com>, <loccittane.com>, <locciyane.com>, <loccltane.com>, <locctiane.com>, <loccutane.com>, <locictane.com>, <locvitane.com>, <locxitane.com>, <lovcitane.com>, and <loxcitane.com> be transferred to the Complainant.

/Kathryn Lee/

Kathryn Lee

Sole Panelist

Date: August 22, 2025