

ADMINISTRATIVE PANEL DECISION

Sol de Janeiro IP, Inc. v. Helena. Slater Helena. Slater, Peneku Mindy
Case No. D2025-3048

1. The Parties

The Complainant is Sol de Janeiro IP, Inc., United States of America (“United States”), represented by IP Twins, France.

The Respondents are Helena. Slater Helena. Slater, and Peneku Mindy, United States (the “Respondent(s)”).

2. The Domain Names and Registrar

The disputed domain names <soldejaneirostore.com>, <soldejaneirostores.com>, <soldejaneirostoreshop.com>, <soldejaneirousshop.com>, <soldejaneirousshop.shop>, <soldejaneirousstore.com>, <soldejaneirousstores.com>, and <soldejaneirousstore.shop> are registered with Gname.com Pte. Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 31, 2025. On July 31, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On August 1, 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(s) (“Redacted for privacy”) and contact information in the Complaint.

The Center sent an email communication to the Complainant on August 4, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) 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 an amended Complaint on August 5, 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(s) of the Complaint, and the proceedings commenced on August 7, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 27, 2025. The Respondent(s) did not submit any response. Accordingly, the Center notified the Respondent(s) default on August 28, 2025.

The Center appointed Phillip V. Marano as the sole panelist in this matter on August 29, 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 global cosmetics company that was founded in 2015, and is part of the L'Occitane Group. The Complainant offers information about its goods and services on its official <soldejanerio.com> domain and website. The Complainant owns valid and subsisting registrations for the SOL DE JANEIRO trademark in numerous jurisdictions around the world, including  Reg. No. 6,012,834 in the United States, registered on March 17, 2020, with first use priority dated back to April 30, 2015.

The Respondent(s) registered each of the disputed domain names between May 15 and July 28, 2025. At the time of this Complaint, the disputed domain names all resolved to inactive pages. However, the Complainant claims and has submitted evidence (at least in regard to the <soldejaneriousstore.shop> disputed domain name) that such has resolved to a website that featured a similar SOL DE JANEIRO stylized trademark with ostensible offers to sell Complainant's beauty products.

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 asserts ownership of the SOL DE JANEIRO trademark and has adduced evidence of trademark registration, dated back to March 17, 2020, with first use priority dated back to April 30, 2015.

The disputed domain names are confusingly similar to the Complainant's SOL DE JANEIRO trademark, according to the Complainant, because they reproduce the Complainant's well-known trademark “in attack position, together with the terms ‘us’, ‘shop’ or store”, and each of those terms are “very closely connected to the Complainant's activities”.

The Complainant further asserts that the Respondent(s) lack any rights or legitimate interests in the disputed domain names based on: the lack of any evidence that the Respondent(s) hold any trademark rights in the disputed domain names; the lack of any relationship with the Complainant; the lack of any license, permission, or authorization from the Complainant; the lack of any evidence that the Respondent(s) are known by the disputed domain names; and the Respondent(s)' use of the disputed domain names in connection with websites that give the false impression that they are owned, operated or endorsed by, or affiliated with, the Complainant.

The Complainant argues that the Respondent(s) have registered and used the disputed domain names in bad faith for numerous reasons, including: the fame of the Complainant's longstanding SOL DE JANEIRO trademark, which predates registration of the disputed domain names; the Respondent(s)' actual or constructive knowledge and intentional targeting of the Complainant's SOL DE JANEIRO trademark; the

Respondent(s)' use of the disputed domain names for websites highly resembling the official website of the Complainant, and reproducing its name and trademark without any disclaimer as to the lack of relationship between the Respondent(s) and the Complainant; the Respondent(s)' use of a proxy registration service, as well as false or inaccurate registration data, to conceal their identity; and Complainant's successful website takedown notices sent to the Registrar and/or Respondent(s)' webhost.

B. Respondent

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

6. Discussion and Findings

To succeed in its Complaint, the Complainant must establish in accordance with paragraph 4(a) of the Policy:

- i. the disputed domain name is identical or confusingly similar to a trademark in which the complainant has rights;
- ii. the respondent has no rights or legitimate interests in respect of the disputed domain name; and
- iii. the disputed domain name has been registered and is being used in bad faith.

Although the Respondent(s) did not reply to the Complainant's contentions, the burden remains with the Complainant to establish by a balance of probabilities, or a preponderance of the evidence, all three elements of paragraph 4(a) of the Policy. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.3 ("A respondent's default would not by itself mean that the complainant is deemed to have prevailed; a respondent's default is not necessarily an admission that the complainant's claims are true [...] [UDRP] panels have been prepared to draw certain inferences in light of the particular facts and circumstances of the case e.g., where a particular conclusion is prima facie obvious, where an explanation by the respondent is called for but is not forthcoming, or where no other plausible conclusion is apparent."); *The Vanguard Group, Inc. v. Lorna Kang*, WIPO Case No. [D2002-1064](#) ("The Respondent's default does not automatically result in a decision in favor of the complainant. The Complainant must still prove each of the three elements required by Policy paragraph 4(a)").

Consolidation: Multiple Respondents

The Complaint was filed in relation to different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules. The Respondent(s) 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. When a complaint is filed against multiple respondents, panels look at whether (i) the domain names or corresponding websites are subject to common control, and (ii) the consolidation would be fair and equitable to all parties. Panels consider a range of non-exhaustive factors for consolidation, which include (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). See [WIPO Overview 3.0](#), section 4.11.2.

Here, the disputed domain names are subject to common control by either the same person or connected parties working in concert with one another, as shown by the following circumstances:

- All were registered through the same Registrar;
- All were registered within relative temporal proximity to each other, specifically between May 15 and July 28, 2025;
- All share the same inconsistencies and patterns in their registration data, namely the city does not exist in the state provided, and both email addresses contain random names followed by five or six digit numbers;
- All target the same Complainant Trademark(s), as defined below, namely SOL DE JANEIRO;
- All use an identical or similar composition or naming convention, specifically the Complainant's SOL DE JANEIRO trademark plus "us", "shop" or "store", "stores" plus a generic Top-Level Domain ("gTLD") ".com" or ".shop";
- All are written in the same language and script, namely English and therefore target the same audience of English-speaking Internet users; and,
- All are configured with the same name servers.

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 (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 3.0](#), section 1.7.

Ownership of a nationally or regionally registered trademark serves as prima facie evidence that the Complainant has trademark rights for the purposes of standing to file this Complaint. [WIPO Overview 3.0](#), section 1.2.1. The Complainant submitted evidence that the SOL DE JANEIRO trademark has been registered in numerous jurisdictions, including the United States as of March 17, 2020, with first use priority dated back to April 30, 2015, a decade before the disputed domain names were registered by the Respondent. Thus, the Panel finds that the Complainant's rights in the SOL DE JANEIRO trademark have been established pursuant to the first element of the Policy.

The only remaining question under the first element of the Policy is whether the disputed domain name is identical or confusingly similar to the Complainant's SOL DE JANEIRO trademark. In this case, the disputed domain name is confusingly similar to the Complainant's SOL DE JANEIRO trademark because, disregarding the ".com" and ".shop" gTLD, the entirety of the mark is reproduced within each disputed domain name. [WIPO Overview 3.0](#), section 1.7. ("This test typically involves a side-by-side comparison of the domain name and the textual components of the relevant trademark to assess whether the mark is recognizable within the domain name [...] In cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar [...]"). The use of different gTLDs, such as ".com" and ".shop" in the disputed domain names, are generally viewed as a standard registration requirement and are typically disregarded under the first element. [WIPO Overview 3.0](#), section 1.11.1.

The confusing similarity is not prevented by combination with the terms "us", "shop", or "store". WIPO Overview, section 1.8 (additional terms "whether descriptive, geographic, pejorative, meaningless, or otherwise" do not prevent a finding of confusing similarity where the relevant trademark is recognizable within the disputed domain name); *see also AT&T Corp. v. WorldclassMedia.com*, WIPO Case No. [D2000-0553](#) ("Each of the domain names in dispute comprises a portion identical to [the AT&T trademark] in which

the Complainant has rights, together with a portion comprising a geographic qualifier, which is insufficient to prevent the composite domain name from being confusingly similar to Complainant's [AT&T trademark]").

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 name. 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. Where, as in this case, the Respondent fail to come forward with any relevant evidence, the Complainant is deemed to have satisfied the second element of the Policy. [WIPO Overview](#), section 2.1.

It is evident that the Respondent, identified by registration data for the disputed domain names as "Helen Slater" or "Peneku Mindy", is not commonly known by the disputed domain names nor the Complainant's SOL DE JANEIRO trademark.

Furthermore, it is well established that a respondent's use of a complainant's trademark to redirect users to a website that offers services in competition with that complainant would not support a claim to rights or legitimate interests. [WIPO Overview 3.0](#), Section 2.5.3; *Richemont International SA v. Turvill Consultants*, Case No. D2014-0862 ("Complainant has not consented to, licensed, or otherwise authorized the Respondent to use or register the disputed domain names and sell similar products..."); *G4S Limited v. Serkouh Abderrahmane, Devarch Digital*, Case No. D2024-5171 ("The fact that Respondent offers services [on its website] in competition with Complainant's services supports a finding that Respondent has targeted Complainant's mark and has sought to enhance its own business by creating a false impression among consumers that Respondent's website is somehow associated with Complainant."). The Complainant submitted screengrab evidence for only the <soldejaneriousstore.shop> disputed domain name depicting a Respondent website which featured a similar SOL DE JANEIRO stylized trademark with ostensible offers to sell Complainant's beauty products. The Complainant asserted that each of the disputed domain names resolved to similar Respondent website content before that content was removed because of the Complainant's takedown notices. The record in this matter is devoid of any evidence which might contradict the Complainant's evidence and assertions as applied to all seven of the disputed domain names. Rather, the Panel finds it most likely that Respondent has intentionally targeted the Complainant's SOL DE JANEIRO trademark in the disputed domain names and associated each with unauthorized website content branded with the same trademark, as well as illegitimate (and/or fraudulent) offers to sell Complainant's products. As discussed further below with respect to the third element of the Policy, the Panel's conclusion is corroborated by the Respondent's use proxy registration services to hide false registration data, the Respondent's concerted registration of numerous disputed domain names targeting the Complainant, the Respondent's failure to offer any reasonable explanation in response to the Complainant's takedown notices or the instant Complaint, and the independent determination of the Registrar and the Respondent's webhosts to disable all Respondent website content.

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

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy proscribes the following non-exhaustive circumstances as evidence of bad faith registration and use of the disputed domain name:

- i. Circumstances indicating that the Respondent has registered or the Respondent has acquired the disputed domain name primarily for the purpose of selling, renting, or otherwise transferring the disputed domain name registration to the Complainant who is the owner of the trademark to a competitor of that Complainant, for valuable consideration in excess of the Respondent's documented out of pocket costs directly related to the disputed domain name; or
- ii. the Respondent has registered the disputed domain name in order to prevent the owner of the trademark 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 disputed domain name primarily for the purpose of disrupting the business of a competitor; or
- iv. by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to the Respondent's 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 the Respondent's website or location or of a product or service on the Respondent's website or location.

Use of a domain name incorporating a complainant's trademark to redirect Internet users to the respondent's website, where goods or services are offered in competition with that complainant, is strong evidence of bad faith under paragraph 4(b)(iv) of the Policy. WIPO Overview, section 3.1.4 ("Panels have moreover found the following types of evidence to support a finding that a respondent has registered a domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the complainant's mark: [...] seeking to cause confusion (including by technical means beyond the domain name itself) for respondent's commercial benefit, even if unsuccessful [...] the lack of a respondent's own rights to or legitimate interests in a domain name [or] redirecting the domain name to a different respondent-owned website [...]"). Here, the disputed domain names each misappropriate the Complainant's identical SOL DE JANEIRO trademark and purportedly resolved to the Respondent's website that contained a similar stylized logo and ostensible offers to sell the Complainant's products. Accordingly, the Panel finds that use of the disputed domain names likely diverted potential customers from the Complainant's business to the website under the disputed domain names by attracting Internet users who mistakenly believe that the disputed domain names were affiliated with the Complainant, and which may further mistakenly believe that the products offered on this website were authentic products offered by the Complainant, or by an entity affiliated to the Complainant.

Additionally, where it appears that a respondent employs a proxy service, or purposefully selects a Registrar that applies proxy services by default, merely to avoid being notified of a UDRP proceeding filed against it, UDRP panels tend to find that this supports an inference of bad faith. WIPO Overview section 3.6. Use of a proxy registration service to shield a respondent's identity and elude or frustrate enforcement efforts by a legitimate complainant demonstrates bad-faith use and registration of a disputed domain name. See *Fifth Third Bancorp v. Secure Whois Information Service*, WIPO Case No. [D2006-0696](#) (the use of a proxy registration service to avoid disclosing the identity of the real party in interest is also consistent with an inference of bad faith when combined with other evidence of evasive, illegal, or irresponsible conduct). The same inference of bad faith is especially strong where a respondent has used false registration data in connection with a disputed domain name. See e.g. *Action Instruments, Inc. v. Technology Associates*, WIPO Case No. [D2003-0024](#) ("Providing false contact information violates paragraph 2 of the Policy, which requires a registrant to represent that the statements it 'made in [its] Registration Agreement are complete and accurate.' Maintaining that false contact information in the WHOIS records (which can easily be updated

at any time) after registration constitutes bad faith use of the domain name because it prevents a putative complainant from identifying the registrant and investigating the legitimacy of the registration.”); *Royal Bank of Scotland Group v. Stealth Commerce*, WIPO Case No. [D2002-0155](#); *Home Director, Inc. v. HomeDirector*, WIPO Case No. [D2000-0111](#). Here, the Panel concurs with the Complainant that the Respondent has most likely claimed to reside in non-existent locations and used randomly generated email addresses in bad faith.

And finally, numerous panels view website suspension by the Registrar or webhost, absent any explanation or attempted justification by the respondent, as added corroboration of bad faith. See *LEGO Juris A/S v. Ammar Briouel / Brahim Mahjoubi*, WIPO Case No. [D2019-0750](#) (involving website suspension following a takedown request by Complainant); *Hershey Entertainment & Resorts Company v. Matthew Faust et al.*, WIPO Case No. [D2023-3384](#) (“Respondent’s [...] failure to respond to the takedown of its Shopify page at the disputed domain name [...] make it more likely than not that Respondent opportunistically registered and used the disputed domain name” in bad faith). Here, all Respondent website content was purportedly disabled by the Registrar and/or the Respondent’s webhost in reaction to the takedown notices sent by the Complainant. Domain suspension or content removal in this manner provides independent third-party corroboration of bad faith registration and use by the Respondent likely in connection with either illegal impersonation of the Complainant, or a fake web shop designed to defraud visitors or phish for their personal and financial information.

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 <soldejaneirostore.com>, <soldejaneirostores.com>, <soldejaneirostoshop.com>, <soldejaneirousshop.com>, <soldejaneirousshop.shop>, <soldejaneirosstore.com>, <soldejaneirosstores.com>, <soldejaneirosstore.shop> be transferred to the Complainant.

/Phillip V. Marano/

Phillip V. Marano

Sole Panelist

Date: September 18, 2025