

ARBITRATION AND MEDIATION CENTER

ADMINISTRATIVE PANEL DECISION

L'Oréal v. Rosenylda Gomes torres, kang li juan, wei ming jie, long peng cheng, zhou pei chao, jiajun chen, and zhang yan hong Case No. D2025-3067

1. The Parties

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

The Respondents are Rosenylda Gomes torres, Brazil; kang li juan, China; wei ming jie, China; long peng cheng, China; zhou pei chao, China; jiajun chen, China; and zhang yan hong, China.

2. The Domain Names and Registrar

The disputed domain names <lancomebeta.com>, <lancomebet-ai.com>, <lancomebet-bet-br.com>, <lancomebet-bet.com>, <lancomebets.com>, <lancomebets.com>, <lancomebets.com>, <lancomebets1.com>, <lancomebets1.com>, <lancomebets1.com>, and <lancomebets1.com> are registered with Dominet (HK) Limited (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 1, 2025. On August 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On August 5, 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 (No information) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 14, 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 disputed domain names are under common control. The Complainant filed an amended Complaint on August 18, 2025.

The Center verified that the Complaint 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 Respondents of the Complaint, and the proceedings commenced on August 19, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 8, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on September 9, 2025.

The Center appointed Alissia Shchichka as the sole panelist in this matter on September 18, 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 French company specialized in cosmetics and beauty products, and is recognized as the one of the world's largest cosmetics groups. It employs over 86,000 people, and operates in more than 150 countries. Among its portfolio, Lancôme, founded in 1935, is positioned as a leading luxury beauty brand and notably holds a strong presence in the anti-ageing skincare sector.

The Complainant also maintains a significant global presence through its subsidiaries, including L'Oréal China (established in 1997, employing over 10,000 people with multiple offices across the country) and L'Oréal Brazil (operating since 1939, with around 2,000 employees, two manufacturing facilities, and a research center focused on products adapted to local markets).

The Complainant has evidenced to be the registered owner of numerous trademark registrations for LANCÔME and LANCOME, including, but not limited to, the following:

- Brazilian Trademark Registration No. 790503263, registered on December 17, 1985, for the word mark LANCÔME in class 3;
- Chinese Trademark Registration No. 775926, registered January 14, 1995, for the word mark LANCÔME in class 42;
- International Trademark Registration No. 1679731, registered June 1, 2022, for the word mark LANCOME, in classes 3, 9, 35, and 41; and
- United States of America Trademark Registration No. 7453776, registered July 23, 2024, for the word mark LANCOME, in classes 3, 9, 35, and 41;

(collectively referred as the "LANCOME" trademark).

The Complainant and its affiliates also operate several domain names reflecting the LANCOME trademark, including lancome.com, registered on July 8, 1997, corresponding to its official website.

The aforementioned trademarks and domain names were registered prior to the disputed domain names registered on May 30, 2025, registered on June 12, 2025, registered on June 13, 2025, registered on June 13, 2025, registered on June 15, 2025, registered on June 15, 2025, registered on June 17, 2025, registered on June 17, 2025, <a href="lancomebet-com

The disputed domain names resolve to websites inviting users to register and participate in gambling activities.

The Respondents, according to the disclosed Whols information for the disputed domain names, are located in Brazil and China respectively.

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 that the LANCOME trademark is well known.

According to the Complainant, the disputed domain names are confusingly similar to the Complainant's LANCOME trademark, as they reproduce the entirety of the LANCOME trademark. The addition of generic terms such as "bet," "vip," "com," and "ai," the geographic term "br" (referring to Brazil), random letters ("s," "a," "x"), and numerical terms ("1"), as well as the use of hyphens, does not prevent a finding of confusing similarity. The Complainant also asserts that the generic Top-Level Domain ("gTLD") ".com" should be disregarded under the first element as it is a standard registration requirement.

The Complainant further contends that the Respondents have no rights or legitimate interests in the disputed domain names, as (i) the Respondents are not commonly known by the disputed domain names and hold no trademark rights corresponding to them; (ii) the Complainant is not affiliated with the Respondents, and has never licensed or otherwise authorized the Respondents to register the disputed domain names; and (iii) the disputed domain names are not used in connection with a bona fide offering of goods or services. Instead, they redirect Internet users to online gambling platforms, and in the case of the disputed domain name , initially displayed a Cloudflare phishing warning page. Such use is neither legitimate nor fair, but rather seeks to exploit the reputation of the Complainant's trademark for commercial gain through misleading and potentially harmful activities.

Finally, the Complainant argues that the Respondents registered and are using the disputed domain names in bad faith. In particular: (i) the LANCOME trademark is well known and significantly predate the Complainant's longstanding trademark registrations, making it implausible that the Respondents were unaware of the Complainant's rights; (ii) the composition of the disputed domain names, which reproduce the Complainant's well-known LANCOME trademark in its entirety together with generic terms such as "bet," "vip," "com," and "ai," the geographic term "br," random letters, and numbers, demonstrates that the Respondents were aware of the Complainant's trademark at the time of registration and registered the disputed domain names based on the attractiveness of the Complainant's trademarks; (iii) the disputed domain names are used to redirect Internet users to online gambling platforms, thereby attempting to attract, for commercial gain, Internet users by creating a likelihood of confusion as to source, affiliation, or endorsement; and (iv) in at least one instance the disputed domain name <lancomebet-com.com> displayed a phishing warning page, further evidencing that the Respondents' intent was to mislead and exploit the goodwill of the Complainant's trademark.

The Complainant requests that the disputed domain names be transferred to the Complainant.

B. Respondents

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

6. Discussion and Findings

6.1. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain names registrants. The Complainant alleges that the domain names registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain names registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain names registrants 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.

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 regards common control, the Panel notes that the disputed domain names share similar compositions. They all incorporate the Complainant's well-known LANCOME trademark, followed by the term "bet", together with other terms ("bet," "vip," "com," "ai"), the geographic term "br" (referring to Brazil), random letters ("s," "a," "x"), and/or the number "1" with some separated by hyphens. Furthermore, the disputed domain names resolve to similar websites displaying Lancomebet and offering gambling services, among which, six out of the 10 disputed domain names promote the same gambling platform at the domain name <3Z.com>. Finally, all of the disputed domain names were registered with the same Registrar, within a close time frame (May and June 2025). These facts suggest 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.

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.

6.2. Discussion and Findings

Under paragraph 4(a) of the Policy, the 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 the Complainant has rights; and
- (ii) that the 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.

The Respondent's default in the case at hand does not automatically result in a decision in favor of the Complainant, however, paragraph 5(f) of the Rules provides that if the Respondent does not submit a response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the Complaint.

Further, according to paragraph 14(b) of the Rules, the Panel may draw such inferences from the Respondent's failure to submit a response as it considers appropriate.

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 names. 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 the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. <u>WIPO Overview 3.0</u>, section 1.7.

Although the addition of other terms here, "bet," "vip," "com," "ai," "br," random letters ("s," "a," "x"), and/or the number "1," with some separated by hyphens, may bear on assessment of the second and third elements, the Panel finds the addition of such terms do 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 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.

Indeed, the Complainant has confirmed that the Respondent is not affiliated with the Complainant or otherwise authorized or licensed to use the LANCOME trademarks or to seek registration of any domain name incorporating the trademarks. The Respondent is also not known to be associated with the LANCOME trademarks, and there is no evidence that the Respondent has been commonly known by the disputed domain names. WIPO Overview 3.0, section 2.3.

Moreover, the deliberate incorporation of the Complainant's trademark into the disputed domain names, combined with their use to promote gambling platforms, supports the inference, on the balance of probabilities, the Respondent's intention of taking unfair advantage of the reputation of the Complainant's trademark to attract Internet users to visit the websites at the disputed domain names and to cause potential confusion as to the origin or affiliation of the websites at the dispute domain names, which cannot constitute a bona fide offering of goods or services nor a legitimate noncommercial or fair use.

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.

Therefore, the Panel concludes that the Respondent does not have any rights or legitimate interests in the disputed domain names and the Complainant has met its burden under paragraph 4(a)(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 or use of a domain name in bad faith.

In the present case, the Panel observes that the Complainant's LANCOME trademarks are well known and were registered and used predating the registration of the disputed domain names. In particular, the Panel notes that the disputed domain name <lancomebetvip.com> resolves to a website where a promotional photo displays "lancômebet.com" (which reproduces the distinctive circumflex accent "^" over the letter "o"). Therefore, the Panel finds that the Respondent was aware of the Complainant's business and trademark rights at the time of registration of the disputed domain names. See WIPO Overview 3.0, section 3.2.2.

In the Panel's view, the Respondent has intentionally attempted to attract Internet users to its websites, for commercial gain, by creating a likelihood of confusion with the Complainant's trademarks regarding the source, sponsorship, affiliation, or endorsement of its websites or products or services offered on them. Pursuant to paragraph 4(b)(iv) of the Policy, this constitutes evidence of registration and use of a domain name in bad faith. WIPO Overview 3.0, section 3.1.4.

In this context, the Panel also attaches significance to the fact that the Center did not receive any response from the Respondent.

Based on the available record, 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 <lancomebeta.com>, <lancomebet-ai.com>, <lancomebet-bet-br.com>, <lancomebet-bct.com>, <lancomebet-com.com>, <lancomebet-s.com>, <lancomebets.com>, <lancomebets1.com>, and <lancomebetx1.com> be transferred to the Complainant.

/Alissia Shchichka/ Alissia Shchichka Sole Panelist

Date: October 1, 2025