

ADMINISTRATIVE PANEL DECISION

Bulgari S.p.A v. Stephane MAMAN, Prestige Immobilier Real Estate LLC
Case No. D2025-4394

1. The Parties

The Complainant is Bulgari S.p.A, Italy, represented by SafeNames Ltd., United Kingdom.

The Respondent is Stephane MAMAN, Prestige Immobilier Real Estate LLC, United Arab Emirates.

2. The Domain Name and Registrar

The disputed domain name <bulgari-residence-dubai.com> is registered with NETIM SARL (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 24, 2025. On October 27, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 28, 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 (REDACTED FOR PRIVACY, Prestige Immobilier Real Estate LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 29, 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 October 29, 2025. On November 3, 2025, the Center sent an email to the Parties regarding possible settlement.

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 November 13, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 3, 2025. The Respondent sent email communications to the Center on October 30, 2025, November 12, 2025 and November 13, 2025. The Respondent filed a Response on November 17, 2025.

The Center appointed Mihaela Maravela as the sole panelist in this matter on December 10, 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

According to uncontested information in the Complaint, the Complainant is an Italian company founded in 1884 by Sotirios Voulgaris. It operates in the luxury goods and hotel markets, and is particularly known for its high-end jewellery including but not limited to watches, rings, necklaces and fragrance products. The Complainant has more than 320 retail locations worldwide.

The Complainant has also operated several hotels since 2001, which was the result of a joint venture between the Complainant and the Luxury Group, a division of Marriot International that also manages Ritz-Carlton hotels. The Complainant's hotels can be found in major locations across the globe such as Milan, London, Dubai, Shanghai, Paris, Tokyo, and Rome. Moreover, the Complainant offers the BVLGARI Lighthouse in Dubai, a 27-story residential building overlooking the Dubai skyline.

The Complainant has provided evidence that it is the registered owner of various trademarks for BVLGARI and BULGARI in numerous jurisdictions, including, but not limited to the following:

- International trademark BULGARI No. 452694, registered on May 15, 1980, for goods in classes 11, 14, 20, and 21, duly renewed, and
- International trademark BVLGARI No. 494237, registered on July 5, 1985, for goods in classes 3, 8, 11, 14, 16, 18, 20, 21, 25, and 34, duly renewed.

The Complainant has registered various domain names that include BULGARI, including the domain name <bulgari.com> on February 17, 1998 which it uses as its official website, and the domain name <bulgarihotels.com>, which it uses to provide its hotel offerings and residences.

The Complainant has also established a social media presence and uses its trademarks BVLGARI or BULGARI to promote its services under this name, in particular on Facebook where it has approximately 4.7 million followers, on X (f.k.a. Twitter), where it has approximately 840 thousand followers, on Instagram where it has approximately 14.2 million followers, on TikTok where it has approximately 623.8 thousand followers.

The disputed domain name was registered on March 12, 2025 and does not resolve to an active website.

The Respondent appears to be an individual located in United Arab Emirates. In his informal communications and Response, he claims to be a real estate professional.

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 name.

Notably, the Complainant contends that it holds multiple registered trademarks for the terms BVLGARI and BULGARI, which is a distinctive identifier associated with the Complainant's goods and services, and that the disputed domain name is confusingly similar to the Complainant's trademark, as it includes the entirety of the BULGARI mark with the addition of the term "residence" and the geographical location "dubai" separated by hyphens. According to the Complainant, the addition of the mentioned terms does not dispel the confusing similarity between the Complainant's BULGARI mark and the disputed domain name.

As regards the second element, the Complainant argues that to the best of its knowledge, the Respondent does not have any trademark rights to the term BULGARI. There is also no evidence that the Respondent retains any unregistered trademark rights to the terms BULGARI or “bulgari residence dubai”. The Respondent has not received any license from the Complainant to use domain names featuring the BULGARI trademark, nor does there exist any commercial relationship between the Complainant and the Respondent. Further, the Complainant submits that the Respondent has not used, nor prepared to use, the disputed domain name in connection with a bona fide offering of goods or services. The disputed domain name resolves to a parked webpage provided by the Registrar. To the best of the Complainant’s knowledge, the Respondent is not commonly known by the terms “bulgari residence dubai” or BULGARI, nor is offering any genuine goods or services under the same terms. In addition, the Complainant argues that given the distinctive nature of the BULGARI mark, there is no current or perceivable future fair use of the disputed domain name, which consists of the Complainant’s trademark in its entirety, with additional generic and geographical terms “residence” and “dubai”, which relate directly to the Complainant’s residence offerings in Dubai. Such composition highlights the Respondent’s intention to create an implied affiliation with the Complainant and its residential offerings.

With respect to the third element, the Complainant argues that its trademark registrations predate the creation date of the disputed domain name by at least 40 years. Furthermore, the Complainant has accrued substantial goodwill since its establishment in 1884. The BVLGARI/BULGARI name has become synonymous with high-end luxury accessories, hotels and residences. All the top results from performing a Google search, including searches from the United Arab Emirates (where the Respondent is based) of the terms “bulgari” and “bulgari residence dubai”, clearly pertain to the Complainant’s brand and services.

As regards the use, the Complainant argues that the disputed domain name replicates the entire BULGARI mark of the Complainant with the addition of the terms “residence” and “dubai” in an attempt to rely on its association with the Complainant’s BULGARI mark and residential offerings in Dubai. Furthermore, the Complainant argues that the Respondent also operates in the same field as the Complainant, specifically, the luxury real estate industry. Therefore, it is implausible to suggest that the disputed domain name was registered without knowledge of the Complainant and its services, being also a risk that the disputed domain names is used to divert traffic to competing services. Moreover, the Complainant’s representatives sent a cease and desist letter to the Respondent but the Respondent provided no response to this letter.

B. Respondent

Both in his Response and in the informal email communications, the Respondent contends that the disputed domain name was chosen only as a personal reference for his own property villa in Dubai, which he has named “Bulgari Residence” informally. He argues that the disputed domain name is not related in any way to the official Bulgari Residences or the Bulgari brand, nor intended to create confusion with these. He claims that he has never used the disputed domain name for any website or commercial purpose, rather it has remained inactive since its registration.

With the occasion of settlement discussions after the Complaint was filed, the Respondent refused to transfer the disputed domain name to the Complainant, arguing that the disputed domain name was registered by him personally and in good faith, and it has never been used for any commercial or misleading purpose. In addition, the Respondent argues that while he does not oppose in principle to discussing a possible transfer, he cannot simply abandon a domain name that he registered in good faith and have held for over a year without any form of consideration. If the Complainant is genuinely interested in acquiring the domain, the Respondent submits he remains open to discussing a reasonable commercial proposal.

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (i) the disputed domain name is identical or confusingly similar to a trademark or

service mark 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.

The applicable standard of proof in UDRP cases is the “balance of probabilities” or “preponderance of the evidence”, and the Panel can draw certain inferences in light of the particular facts and circumstances of the case. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ([“WIPO Overview 3.0”](#)), section 4.2.

The Panel has taken note of the [WIPO Overview 3.0](#), and, where appropriate, will decide consistently with the consensus views stated therein.

A. Identical or Confusingly Similar

Under paragraph 4(a)(i) of the Policy, the Complainant must prove that it has rights to a trademark, and that the disputed domain names are identical or confusingly similar to that trademark. This first element under the Policy functions primarily as a standing requirement. [WIPO Overview 3.0](#), section 1.7.

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

As regards the second limb of the first element, the test for confusing similarity involves a reasoned but relatively straightforward comparison between the trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7. It is well established that the generic Top-Level Domain (“gTLD”) may be ignored when assessing the confusing similarity between the disputed domain name and the Complainant’s trademarks as they are viewed as a standard registration requirement. See section 1.11.1 of the [WIPO Overview 3.0](#).

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is 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, “hotel” and of the geographical term “dubai”) and hyphens 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 name 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.

Here, the Complainant has made a prima facie case by establishing its trademark rights, denying that the Respondent has authorization to use the Complainant’s mark, noting that there is no evidence that the

Respondent owns trademarks for “bulgari” or “bulgari residence dubai”, or that the Respondent has been commonly known by the disputed domain name.

In the present case, the disputed domain name does not resolve to an active website. It includes the well-known trademark of the Complainant and descriptive terms for the Complainant’s residential properties in Dubai, which gives the impression that it will resolve to a website affiliated to the Complainant or is associated with the Complainant’s operations in Dubai. However, the Complainant submits that the Respondent has no connection or affiliation with the Complainant, who has not consented to the Respondent’s use of the disputed domain name. Further, the Respondent does not hold trademark rights for “bulgari”, or “bulgari residence dubai”, and is not known to carry on any commercial activity under a name corresponding to the disputed domain name. These circumstances do not indicate that the Respondent is using the disputed domain name in connection with a bona fide offering of goods or services, nor that he is making a legitimate noncommercial or fair use of the disputed domain name in the sense of the Policy. Furthermore, there is no evidence that the Respondent has been commonly known by the disputed domain name in the meaning of the Policy.

According to the above circumstances and evidence with the Complaint, the Panel finds that the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name.

In his Response and informal communications to the Center, the Respondent contends that he had chosen the disputed domain name as a personal reference for his own property villa in Dubai, which he has named “Bulgari Residence” informally. In this case, in view of the composition of the disputed domain name and the distinctive and well-known character of the Complainant’s trademark, the Panel is of the opinion that the disputed domain name is likely to mislead Internet users. Moreover, the Respondent provided no evidence with respect to the alleged ownership of a villa in Dubai and the reason for choosing “Bulgari Residence” as the alleged informal name for it, or on how he plans to use the disputed domain name. While the Respondent’s explanations point to a lack of commercial use, the Respondent failed to provide any type of evidence or even any clear explanation for its intended use, and the Panel thus draws an adverse inference from such omission. Furthermore, it is well established that future legitimate use of the disputed domain name is not a valid defense when it does not address the Respondent’s present lack of legitimate rights or interests in the disputed domain name. Therefore, given all circumstances of the case and limitations of the present record, the Panel finds the explanation of the Respondent contrived.

In the Panel’s view, as explained above, the Respondent has not sufficiently rebutted the Complainant’s prima facie showing and has not come forward with any evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

Accordingly, 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.

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.

According to the [WIPO Overview 3.0](#), section 3.1.4, panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names incorporating the mark plus a descriptive term – in the area of activity of the Complainant in this case) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. In the present case, the Panel notes that the Respondent registered the disputed domain name long after the Complainant registered

and used its BULGARI trademark. The Complainant also has a strong commercial presence on the Internet and in Dubai. In view of the global fame of the Complainant, the well-known character of its BULGARI trademark, the Complainant's activities in Dubai, the composition of the disputed domain name, and the Respondent's claimed professional activity in real estate area, it is unlikely that the Respondent was not aware of the Complainant's trademark and business when registering the disputed domain name.

The Respondent has not credibly contested the Complainant's case. Moreover, the Respondent does not deny knowledge of the Complainant, its BULGARI trademark, and the Complainant's residential properties in Dubai when he registered the disputed domain name. Rather, the Respondent states that the disputed domain name is "not related in any way to the official Bulgari Residences or the Bulgari brand." This statement reinforces in the Panel's view the conclusion that the Respondent was aware of the Complainant's trademark at the registration of the disputed domain name.

Moreover, the Respondent has not provided any credible explanation or any type of evidence supporting his assertion that he registered the disputed domain name as a personal reference for his own property villa in Dubai, which he has named "Bulgari Residence" informally. Further, the Respondent's affirmation that he registered the disputed domain name because it reminds him of the "bulgari area" seems contrived, and is not backed by any explanation on what the mentioned area is, nor by any evidence of some sort.

Based on the evidence before it, the Panel considers that it is unlikely that the Respondent might have adopted this term independently of the Complainant or its rights. In addition, the Respondent admits to be working as a real estate professional in Dubai. It is therefore unlikely that the Respondent did not target the Complainant with the registration of the disputed domain name, that includes the terms "dubai" and "residence" with the likely purpose to attract internet users to his online location, particularly given the lack of any evidence on the alleged intention of the Respondent to use the disputed domain name for personal use for a residential villa in Dubai.

Accordingly, on balance of probabilities, the panel finds that the Respondent registered the disputed domain name with the Complainant and its trademark in mind.

As regards the use, the disputed domain name is not actively used for a website. However, Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's trademark, the composition of the disputed domain name, and the findings in section C above. Accordingly, the Panel finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

The fact that after the Complaint was filed, the Respondent claimed to be "open to discussing a reasonable commercial proposal" for a possible transfer of the disputed domain name, also suggest, on balance, that paragraph 4(b)(i) of the Policy might be applicable, which is a further indication of bad faith.

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 name <bulgari-residence-dubai.com> be transferred to the Complainant.

/Mihaela Maravela/

Mihaela Maravela

Sole Panelist

Date: December 23, 2025