

ADMINISTRATIVE PANEL DECISION

Association Centre Talleyrand, Anissa Naama v. Patrick Lehner
Case No. D2025-5047

1. The Parties

The Complainants are Association Centre Talleyrand (the “first Complainant”), France, and Anissa Naama (the “second Complainant”), France, represented by Selarl Cabinet Pierrat, France.

The Respondent is Patrick Lehner, Switzerland.

2. The Domain Names and Registrar

The disputed domain names <centretalleyrand.com>, <centretalleyrand.net>, and <centretalleyrand.online> are registered with Network Solutions, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed in French with the WIPO Arbitration and Mediation Center (the “Center”) on December 4, 2025. On December 5, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On December 5, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to the Complainant on December 9, 2025, providing the registrant and contact information disclosed by the Registrar, confirming the language of the Registration Agreement for the disputed domain names is English, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint and further amended Complaint translated into English on December 10 and 11, 2025.

The Center verified that the Complaint together with the amended Complaints 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 December 11, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 31, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 2, 2026. The Response was filed late on January 2, 2026.

The Center appointed Andrew D. S. Lothian as the sole panelist in this matter on January 9, 2026. 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 first Complainant is the Association Centre Talleyrand, registered in the French Répertoire National des Associations under number W751280924. The second Complainant is Naama Anissa, a member of the Board of Directors of the first Complainant.

The first Complainant was founded at an Extraordinary and Constituent General Meeting held at Reugny, France on September 27, 2025. On September 28, 2025, the first Complainant was declared as an Association (under the French Loi relative au contrat d'association of July 1, 1901) at the applicable préfecture de police. Its objects (machine translated) are to transmit and promote the life, work, thought, and legacy of Charles-Maurice de Talleyrand-Perigord; to encourage historical, diplomatic, and political research on him; to support the preservation, digitization, and dissemination of archives and publications relating to Talleyrand. The first Complainant also administers a literary prize named the "Talleyrand Book Prize", or in French, the "Prix du Livre Talleyrand", details of which are available at its official website, "www.centretalleyrand.org".

The first Complainant does not appear to own any registered trademarks. The second Complainant is the owner of French Registered Trademark Number 5153673 for the word mark PRIX DU LIVRE TALLEYRAND, registered with effect from June 5, 2025, in Class 41.

An older French association with similar purposes to the first Complainant also exists, namely l'Association Les Amis de Talleyrand ("Amis de Talleyrand"), registered in the French Répertoire National des Associations under number W362000108, and declared as an Association at the applicable préfecture de police on March 2, 1999. Article 1 of the by-laws of Amis de Talleyrand, as amended and approved by an extraordinary general meeting of September 30, 2023, a copy of which is produced by the Respondent, provides that "The association plans to [...] Organize and award a 'Talleyrand Book Prize'".

At least three of the founders of the first Complainant appear to have previously been Board Members of Amis de Talleyrand. Due to disagreements about its leadership and direction, these Board Members, which included the second Complainant, resolved to resign their positions and create the first Complainant, at the same time inviting members of Amis de Talleyrand to join them if they wished to do so.

An email exchange among three founders of the first Complainant, including the second Complainant, dated September 12, 2025, discusses preparations for the founding of the first Complainant, including plans for resignations from their positions in Amis de Talleyrand on September 25, 2025, and for the issue of a letter to the members of Amis de Talleyrand on that date inviting them to contact the said founders. On September 15, 2025, a domain name intended for the first Complainant's use, namely, [<centretalleyrand.org>](mailto:centretalleyrand.org), was registered by a person or entity unknown to the Panel. The Complainants note that a website for the first Complainant was published on the same day, along with an email address "[\[...\]](mailto:[...]@centretalleyrand.org)@centretalleyrand.org", and that the site's homepage went live the following day.

On or about September 26, 2025, the said Board Members of Amis de Talleyrand announced to its members the reasons for their decision to resign from that association, stating (machine translation) "We have decided to create a new structure that will be open, modern, and responsive to everyone: the Talleyrand Center. We invite those who wish to join us to contact us at this address: "[\[...\]](mailto:[...]@centretalleyrand.org)@centretalleyrand.org".

The said resignation announcement and notice of the proposed new association appears to have precipitated action on the part of certain remaining members of Amis de Talleyrand. On September 26, 2025, Amis de Talleyrand applied for a French registered trademark in respect of the word mark CENTRE TALLYRAND in Classes 35 and 41. Said application has been published but has not yet proceeded to grant.

The disputed domain names were registered on September 29, 2025. The websites associated with the disputed domain names are parking pages provided by the Registrar. One of these, in respect of the disputed domain name <centretalleyrand.net> contains pay-per-click (“PPC”) links which are not directly targeted to the Complainant’s activities. The Respondent states that it is a Board Member of Amis de Talleyrand, serving initially between 2003 and 2015, and thereafter in office since 2023.

According to its said website, the first Complainant held its official launch event in Paris, France, on November 27, 2025, attended by nearly 100 people, including diplomats, historians, writers, journalists, and supporters. In addition, according to the said website, the first Complainant’s award of the Talleyrand Book Prize 2025 was covered in the press on November 18, 2025. The said website’s news page provides links to two corresponding online news articles in “www.livreshebdo.fr” and “www.actualitte.com” respectively.¹ Both of these articles refer to the first Complainant as “Centre Talleyrand”.

5. Parties’ Contentions

A. Complainant

The Complainants contend that they have satisfied each of the elements required under the Policy for a transfer of the disputed domain names.

Notably, the Complainants contend that there is a likelihood of confusion between the disputed domain names, the second Complainant’s trademark, the corporate name of the first Complainant, and the domain name of the first Complainant. The Complainants note that the domain name under which the first Complainant’s trademark is used is identical to the disputed domain names, which differ only in the Top-Level Domain, adding that the products and services for which the said trademark is registered correspond to those that could be used by the disputed domain names.

The Complainants assert that the website at the domain name <centretalleyrand.org> has been operated publicly since the day of its registration, with content designed for the first Complainant’s activities and those of the Talleyrand Book Prize, noting that the Complainants have used said domain name, in contrast to the disputed domain names, which are displaying “Under Construction” pages. The Complainants assert that their rights predate those of the Respondent, adding that the first Complainant is known to the public by its said domain name. The Complainants submit that the Respondent has no legitimate interest in the disputed domain names and has registered them to parasitize the first Complainant and its said domain name. The Complainant states that the disputed domain names create an obvious risk of confusion and cause harm to both of the Complainants.

The Complainants note that the disputed domain names were created on September 29, 2025 following an announcement to Amis de Talleyrand by certain founders of the first Complainant on September 26, 2025, whereby the Respondent cannot claim to be unaware of the existence of the first Complainant’s domain

¹The Panel obtained this information from a visit to the first Complainant’s official website (and the external links to the press articles) on January 12, 2026. See [WIPO Overview 3.0](#), section 4.8, which notes in part that it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision. The Panel notes that it contemplated putting the finding of its research to the Parties but determined that this was not necessary because it is clear to the Panel that both of Parties are already aware of the said website and its content, and notably, the Respondent is specifically on notice of this as the corresponding domain name <centretalleyrand.org> and its associated website were discussed in the Complaint.

name. The Complainants assert that the Respondent's bad faith is characterized by the fact that a simple web search would have revealed the first Complainant's domain name, as it is the first result when the keywords "Centre Talleyrand" are entered into a search engine (evidence not provided). The Complainants add that the disputed domain names were registered after registration of the first Complainant's domain name, and after the creation of the first Complainant, and the creation of the Talleyrand Book Prize operated by the first Complainant's said website. The Complainants conclude that the disputed domain names were registered with the aim of disrupting the Complainants' activities and create a risk of confusion in the minds of the public.

B. Respondent

The Respondent contends that the Complainants have not satisfied the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Respondent states that it is a Board Member of Amis de Talleyrand, adding that among its members are heirs of Charles-Maurice de Talleyrand-Perigord, and that the Amis de Talleyrand have a right to "protect the illegal usage of this famous ancestor's name" by others such as the Complainants. The Respondent notes that the Amis de Talleyrand applied for a trademark for CENTRE TALLEYRAND in September 2025, and had recorded the name Prix du Livre Talleyrand in their association's by-laws in 2023. The Respondent contends that "an organized gang" has "stolen" and registered the trademark PRIX DU LIVRE TALLEYRAND, has "stolen" the list of members of the Amis de Talleyrand, and has attempted to attract such members to a new organization. The Respondent adds that "one of their representatives" has a history of criminal convictions, and that, with the authorization of its board, the Respondent registered a portfolio of domain names including <amis-de-talleyrand.net> and those available concerning "Centre Talleyrand" with a view to preventing further damage to Amis de Talleyrand. The Respondent concludes that the Complainants' claims are "legally void".

6. Discussion and Findings

6.1. Preliminary issue: Consolidation of Multiple Complainants

The present Complaint is brought by two affiliated parties, the first Complainant being the Association Centre Talleyrand, and the second Complainant being a founder and office bearer of the said association. Neither the first nor the second Complainant made any specific request to consolidate their respective complaints against the Respondent. However, the nature of the Complaint suggests that they wish the Panel to order such consolidation. The Response did not address the topic of Complainant consolidation.

In considering whether a complaint filed by multiple complainants may be brought, panels look at whether (i) the complainants have a specific common grievance against the respondent, or the respondent has engaged in common conduct that has affected the complainants in a similar fashion, and (ii) it would be equitable and procedurally efficient to permit the consolidation. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.1.

In the present case, the Panel considers that consolidation is both equitable and procedurally efficient, and that the Complainants have a specific common grievance against the Respondent by virtue of being affiliated entities. The registration of the disputed domain names by the Respondent could be considered as affecting each of the Complainants in a similar manner. It appears to the Panel to be both equitable and procedurally efficient to permit the consolidation. The Panel therefore orders consolidation of the Complainants' respective Complaints.

6.2. Preliminary issue: Late Response

As noted above, the Response was filed on January 2, 2026. This was two days after the due date for its submission. On the same day, the Respondent noted by email to the Center that it had been away due to

the holiday season and could not provide an answer earlier. It indicated that it would file the Response over the course of that day and expressed its appreciation for being allowed to do so in order that it could present its defense.

The Panel has resolved to allow the Response to be admitted, though late, in terms of its general powers under paragraph 10 of the Rules, on the basis that (1) the lateness is very minor, extending only two days beyond the due date; (2) the notification period for the Complaint extended from December 11, 2025, across the holiday season until the end of the year; and (3) crucially, the Panel can see no prejudice arising to the Complainants from the late admission of the Response. The Complainants did not oppose the late filing of the Response.

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 Second-Level Domain of each of the disputed domain names is "centretalleyrand", and this must be compared to the second Complainant's registered trademark PRIX DU LIVRE TALLEYRAND. In the first instance, it may be seen that the terms are not identical, but the Panel must also consider whether they are confusingly similar.

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. 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 disputed domain name. In some cases, such assessment may also entail a more holistic aural or phonetic comparison of the complainant's trademark and the disputed domain name to ascertain confusing similarity. Each case is judged on its own merits, but 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 to that mark for purposes of UDRP standing. [WIPO Overview 3.0](#), section 1.7.

Here, there is one common feature to both the Complainant's mark and the disputed domain names, namely the term "talleyrand". The Panel finds that "TALLEYRAND" is a dominant feature of the Complainant's mark. All of the focus of the mark is on this term, which qualifies and provides specificity to the remaining phrase PRIX DU LIVRE ("book prize"). The words in this latter phrase are, comparatively speaking, subordinate, more general, and descriptive in nature. This is somewhat similar to the scenario described in *Fédération AGIRC-ARRCO v. cai hai qing*, WIPO Case No. [D2023-4559](#), in which the complainant's mark was RETRAITE COMPLEMENTAIRE AGIRC-ARRCO. RETRAITE COMPLEMENTAIRE translates to "complementary pension". In that case, the panel found that AGIRC-ARRCO was the dominant feature of the relevant mark, and it may be noticed that, in a similar manner to the present case, the term AGIRC-ARRCO qualifies and provides specificity to the more general phrase "complementary pension".

The Panel finds the dominant feature of the relevant 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. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms, here, "centre", may bear on assessment of the second and third elements, the Panel finds the addition of such term does 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 above is sufficient to meet the requirements of the first element of the Policy. However, the Complainants also assert that the disputed domain names are confusingly similar to the corporate name and domain name of the first Complainant. The Panel notes that the Policy does not directly anticipate standing based on corporate names or domain names; however, this is effectively a claim to unregistered trademark rights in the first Complainant's corporate name "Centre Talleyrand" (as also reflected in its domain name absent the space) and it is convenient to consider such claim before leaving the first element discussion.

To establish unregistered trademark rights for purposes of the UDRP, the complainant must show that its mark has become a distinctive identifier which consumers associate with the complainant's goods and/or services. Relevant evidence demonstrating such acquired distinctiveness (also referred to as secondary meaning) includes a range of factors such as (i) the duration and nature of use of the mark, (ii) the amount of sales under the mark, (iii) the nature and extent of advertising using the mark, (iv) the degree of actual public (e.g., consumer, industry, media) recognition, and (v) consumer surveys. [WIPO Overview 3.0](#), section 1.3.

Here, there is relatively little evidence available regarding the Complainant's use of the term "Centre Talleyrand". However, it is clear that the first Complainant's foundation under the association name "Centre Talleyrand" and its intention to use the corresponding domain name were both publicly announced to a range of interested parties, that a well-attended launch event took place before a diverse audience under the first Complainant's name, and that the first Complainant has been publicly recognized in the media by way of two independent reports upon the first Complainant's award of the Talleyrand Book Prize 2025. Consequently, although the duration of the mark is not of a longstanding nature, the first Complainant appears to have managed to achieve a marginally sufficient degree of public recognition in a remarkably short period of time.

The fact that a respondent is shown to have been targeting the complainant's mark may support the complainant's assertion that its mark has achieved significance as a source identifier. [WIPO Overview 3.0](#), section 1.3. Although the Respondent has not activated any of the websites associated with the disputed domain names, which remain pointed to Registrar parking pages, it is clear to the Panel from the close proximity in timing of the Complainants' breakaway announcement including their announcement of the name "Centre Talleyrand" on the one hand, and the registration of the disputed domain names which match that name exactly on the other hand, that in registering the disputed domain names the Respondent was responding to said announcement by targeting the first Complainant's (then somewhat nascent) unregistered mark. This will be explored further in the discussion of the second and third elements under the Policy below. For present purposes, taking all of the above into consideration, the Panel finds it established on the present record that the first Complainant has UDRP-relevant unregistered trademark rights in the mark CENTRE TALLEYRAND. This is identical to the disputed domain names with the exception of the absence of a space, which is not of any consequence as spaces are not permitted in domain names for technical reasons.

The applicable Top-Level Domain ("TLD") in a domain name (here ".com", ".net", and ".online", respectively), is viewed as a standard registration requirement and as such may be disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1.

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 Complainants have established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names based upon their submissions that their rights predate those of the Respondent, that the first Complainant is known to the public by its corporate name and its corresponding domain name, that the Respondent registered the disputed domain names to parasitize the first Complainant and its said domain name, and that the disputed domain names create an obvious risk of confusion and cause harm to both of the Complainants. The Panel therefore turns to the Respondent's case in rebuttal.

The essence of the Respondent's case is that it has a right to "protect the illegal usage of [Talleyrand's] name" by those such as the Complainants following the Complainants' foundation of the first Complainant. This does not demonstrate rights or legitimate interests under the Policy. Notably, the Respondent produced nothing indicating that either it or Amis de Talleyrand hold any formal rights which would entitle him or them to prevent or block the Complainants' use of the name "Talleyrand" either in the first Complainant's corporate name, its domain name, or otherwise. There is no evidence before the Panel that the Complainants' use of the name that it has chosen is illegal in any respect in which a legal remedy constituting a right or legitimate interest under the Policy is available to the Respondent.

As far as the Panel is concerned, any person or group of people would be entitled to create a society promoting Talleyrand's legacy as the Complainants have done, with reference to the "Talleyrand" name, as long as, in doing so, they do not pass themselves off as (or infringe the trademark of) any other such entity. There is no suggestion that any such passing off or trademark infringement is occurring here. The fact that the Respondent's organization might have an express purpose to issue its own "Prix du Livre Talleyrand" does not prevent the Complainants from issuing a literary prize by that name or from registering PRIX DU LIVRE TALLEYRAND as a trademark. In any event, the real issue before the Panel is the Respondent's rights and legitimate interests, if any, in the disputed domain names, not in the name of the book prize or which organization may offer such a prize.

On this topic, the Panel notes that the Respondent has not established that, before any notice to it of the dispute, it has made any use of, or demonstrable preparations to use, the disputed domain names or a name corresponding to the disputed domain names in connection with a bona fide offering of goods or services conform to paragraph 4(c)(i) of the Policy. The Respondent operates under the name "Association Les Amis de Talleyrand" which does not correspond to the name "centretalleyrand" or "Centre Talleyrand". There is likewise no evidence that the Respondent has been commonly known (as an individual, business, or other organization) by the disputed domain names, conform to paragraph 4(c)(ii) of the Policy.

Finally, the evidence before the Panel suggests that the Respondent registered the disputed domain names as a direct and almost immediate reaction to the Complainants' announcement of a breakaway organization, presumably with intent to block the Complainants from using their chosen name, as the Respondent itself says, "with a view to preventing further damage to the Amis de Talleyrand". As noted above, the Panel cannot identify any right that the Respondent or his organization has to block the Complainants from their activities, nor in any event does the Respondent specify how such activities would be adverse to any rights of the Respondent or its association, and as such, the Respondent's stated reason for registering the disputed domain names does not appear to constitute a legitimate noncommercial or fair use of any of the disputed domain names, conform to paragraph 4(c)(iii) of the Policy.

Before leaving this topic, however, the Panel must also deal with the fact that the Respondent's organization has itself made an application for a trademark in the mark CENTRE TALLEYRAND, which has not yet proceeded to grant. This mark was filed on September 26, 2025, being the day when the Complainants announced the foundation of their breakaway organization to the Respondent's membership. Arguably, this would not constitute a right within the meaning of paragraph 4(a)(ii) of the Policy because it is still under application. However, the Panel notes that, had it already proceeded to grant, it would not have led the

Panel to determine that the Respondent is able to establish rights or legitimate interests for the following reason.

Panels have recognized that a respondent's prior registration of a trademark which corresponds to a domain name will ordinarily support a finding of rights or legitimate interests in that domain name for purposes of the second element. [WIPO Overview 3.0](#), section 2.12.1. The existence of a respondent trademark does not however automatically confer rights or legitimate interests on the respondent. For example, panels have generally declined to find respondent rights or legitimate interests in a domain name on the basis of a corresponding trademark registration where the overall circumstances demonstrate that such trademark was obtained primarily to circumvent the application of the UDRP or otherwise prevent the complainant's exercise of its rights (even if only in a particular jurisdiction). Absent evidence of such circumstances indicating pretext however, panels have been reluctant to reject a respondent trademark registration out of hand. [WIPO Overview 3.0](#), section 2.12.2.

In this particular case, as noted above, the timing of the filing of the Respondent's organization's CENTRE TALLEYRAND trademark indicates that it is a direct reaction to the Complainants' announcement of the name (and domain name) of the breakaway organization. As the Panel sees it, this constitutes an attempt to prevent the Complainants' exercise of their rights in a particular jurisdiction, namely France. The fact that the Respondent considers that it was acting out of a desire to protect either its organization, the organization's membership, or the legacy of Talleyrand does not change the Panel's view, nor would the Respondent's concerns about the bona fides or motivations of any person or persons behind the first Complainant have any effect upon the Panel's analysis.

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.

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 Panel notes that the Respondent operates a rival organization to that of the Complainants. Both of the Parties are of the view that their respective organizations promote the legacy of Talleyrand, whereby to some degree they are in "competition" with one another, albeit not necessarily typical commercial competition as such. Upon the announcement of the name of the Complainants' breakaway organization, the Respondent immediately proceeded to register the disputed domain names which represent an exact match for the first Complainant's announced organization name and (then nascent) unregistered trademark.² The Panel has found that it did so without rights or legitimate interests within the meaning of the Policy. As discussed above, its stated reason of protecting Talleyrand's legacy or any perceived damage to its own association does not appear to have any legal underpinnings.

²On the topic of domain names registered in anticipation of trademark rights or "nascent" trademarks, see [WIPO Overview 3.0](#), section 3.8.2 in which it is noted that in certain limited circumstances where the facts of the case establish that the respondent's intent in registering a domain name was to unfairly capitalize on the complainant's nascent (typically as yet unregistered) trademark rights, panels have been prepared to find that the respondent has acted in bad faith. The example scenarios described in the section are broadly in line with the factual background here, in that the disputed domain names were registered as an immediate response to an announcement of the name of an organization, based to some extent on the Respondent's "insider knowledge" in that the announcement letter was written to the membership of the Respondent's organization, whereby it appears to have come to the Respondent's attention.

In the Panel's opinion the factual matrix indicates on the balance of probabilities that the Respondent registered the disputed domain names primarily for the purpose of disrupting the business of a competitor conform to paragraph 4(b)(iii) of the Policy. Notably, the Respondent has brought forward no legitimate purpose for the registrations but rather has displayed an intent to block and therefore disrupt the Complainants' activities in terms of the corporate name which the Complainants adopted. In the particular circumstances of this case, this is sufficient in the Panel's view to constitute registration and use in bad faith within the meaning of the Policy.

For completeness, it should be noted that the scenarios enumerated in UDRP paragraph 4(b) are non-exhaustive, and that panels have applied the notion of a "competitor" beyond the concept of an ordinary commercial or business competitor to also include the concept of "a person who acts in opposition to another" for some means of commercial gain, direct or otherwise. While this may include prior customers or business partners of the complainant, it would not encompass legitimate noncommercial criticism. [WIPO Overview 3.0](#), section 3.1.3. Notwithstanding the fact that the Respondent is critical of an unspecified member of the first Complainant in the Response, there is no suggestion therein, either expressed or implied, that the disputed domain names were intended for the publication of noncommercial criticism of the Complainants, nor, crucially, has any such criticism been published on the associated websites over a period of well over three months since they were registered.

Although any commercial gain which the Respondent may have sought by blocking the Complainants' activities might be limited in extent, it may be held to encompass the present or future membership fees of its organization, which it might have intended to preserve or increase by preventing members from moving to the breakaway organization, or by diverting future members away from joining such organization and toward the Amis de Talleyrand.

While the Parties clearly have their differences, it might be best for the fulfilment of their similarly expressed and largely mutual purposes if they attempted to resolve their differences through dialog rather than opposing registrations in the domain name system, bearing in mind the fact that both strongly believe that their efforts are directed at the defense and promotion of the interests of their respective associations and Talleyrand's legacy.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitutes bad faith within the meaning of the Policy.

The Panel finds that 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 <centretalleyrand.com>, <centretalleyrand.net>, and <centretalleyrand.online> be transferred to the Complainants.

/Andrew D. S. Lothian/

Andrew D. S. Lothian

Sole Panelist

Date: January 20, 2026