

ADMINISTRATIVE PANEL DECISION

Lancaster SARL v. Ellie Brookes, Riley Bryan, Lara Price
Case No. D2025-5098

1. The Parties

The Complainant is Lancaster SARL, France, represented by Hogan Lovells (Paris) LLP, France.

The Respondents are Ellie Brookes, Riley Bryan, and Lara Price, Germany.

2. The Domain Names and Registrar

The disputed domain names <jerusalemlancaster.com>, <lancastercanada.net>, and <lancastertürkiye.com> [xn----lancastertrkiye-8vb.com] are registered with Paknic (Private) Limited (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on December 8, 2025. On December 9, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On December 11, 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 (Whois Agent, Web Domains By Proxy) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 12, 2025, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar(s), 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 December 16, 2025.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the "Policy" or "UDRP"), the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules").

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on December 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 7, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on January 12, 2025.

The Center appointed Fabrizio Bedarida as the sole panelist in this matter on January 16, 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 Complainant in this administrative proceeding is a leather goods company founded in Paris in the 1990s. Today, the Complainant offers a wide range of products including handbags, wallets, small leather goods and travel items, with a catalogue of over 750 products per season. The Complainant operates over 10 stores and an online e-commerce site via its website. The Complainant also has over 1,000 resellers throughout Europe and in Asia.

The Complainant has numerous registrations for the LANCASTER trademark around the world. The Complainant is, *inter alia*, the owner of the following:

International Trademark registration number 490672C for the LANCASTER (device) trademark registered on February 4, 1985;

United Kingdom Trademark registration number UK00003697688 for the LANCASTER (word) trademark registered on April 29, 2022; and

European Union Trade Mark registration number 018340878 for the LANCASTER (word) trademark registered on March 12, 2021.

The Complainant operates its main website at "www.lancaster.com".

All the disputed domain names were registered in 2023 and resolve to similar websites. The websites for all three disputed domain names feature the Complainant's LANCASTER trademark, and purport to offer for sale LANCASTER-branded goods at discounted prices. All the websites also display a copyright notice in the footer.

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 contends that the disputed domain names are confusingly similar to the LANCASTER trademark, that the Respondents have no rights or legitimate interests in respect of the disputed domain names, that the Respondents' use of the disputed domain names for websites displaying the Complainant's LANCASTER trademark, in an apparent attempt to impersonate the Complainant or to suggest an affiliation with the Complainant, does not give rise to rights or legitimate interests, and that it is implausible that the Respondents were unaware of the Complainant's renowned trademark when they registered the disputed domain names.

The Complainant further affirms that each of the registrants' addresses corresponds to that of a third-party cafe or restaurant, that there is no evidence to suggest that any business selling LANCASTER-branded goods is located at any of the underlying registrants' addresses. Nor is there any evidence that the named individuals "Lara Price", "Ellie Brookes", and "Riley Bryan" are in any way connected to these cafes or restaurants. The Complainant therefore infers that the disputed domain names were registered using incomplete or false registrant information.

Finally, the Complainant contends that the disputed domain names were registered and are being used in bad faith.

Regarding the Respondents' identity, the Complainant has requested a consolidation of multiple disputed domain names and the Respondents.

B. Respondents

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

6. Discussion and Findings

In order for the Complainant to obtain a transfer of the disputed domain names, paragraph 4(a) of the Policy requires that the Complainant must demonstrate to the Panel that:

- (i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain names; and
- (iii) the disputed domain names have been registered and are being used in bad faith.

Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name 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 name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name 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.

With respect to the issue of common control, the Panel finds, on the balance of probabilities, that the disputed domain names identified in the Complaint are registered by the same domain name holder or are at least under common control. This conclusion is based on the following factors:

All of the disputed domain names resolve to websites purporting to offer for sale goods bearing the Complainant's LANCASTER trademark at reduced prices.

All of the Respondent's websites display the same email address: "[...]"@sgawsw.shop".

All of the disputed domain names were registered in 2023.

All of the disputed domain names were registered using the same proxy service and through the same Registrar.

Two out of three of the registrants' email addresses originate from the same domain name or service provider, namely "[...]"@oursmail.com".

The overall composition of the disputed domain names is highly similar. Each incorporates the Complainant's LANCASTER trademark in its entirety, followed or preceded by the geographical location where the target customers are located, i.e., "türkiye", "jerusalem" or "canada", under the generic Top-Level Domains ("gTLDs") ".com" or ".net".

The information relating to all of the disputed domain names, as disclosed by the Registrar, indicates that each underlying registrant is located in Germany. Each registrant has provided a physical address corresponding to the location of a cafe or a restaurant.

Based on these cumulative factors, the Panel concludes that the disputed domain names are more likely than not 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.

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.

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 incorporated entirely and 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 the other terms here, "jerusalem", "canada" and "türkiye", 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 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. Furthermore, the Panel considers that the use of the disputed domain names (as described under Sections 4 and 5 of the Decision) cannot fulfill the requirements in the Oki Data test. See *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#), and [WIPO Overview 3.0](#), section 2.8. In this regard, the websites at the disputed domain names do not accurately or prominently disclose the Respondent’s (lack of) relationship with the Complainant. Rather, the reproduction of the Complainant’s LANCASTER trademark on the websites, the copyrighted product images of LANCASTER-branded goods, and the composition of the disputed domain names, falsely imply that the websites are affiliated with the Complainant. Under the circumstances of this case, even in the event that the Respondent is reselling genuine LANCASTER-branded goods, its use of the disputed domain names does not support a finding of rights or legitimate interests.

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

C. Registered and Used in Bad Faith

In the present case, the Panel notes that the Respondent was aware of the Complainant’s trademark registrations and rights to the LANCASTER trademark when it registered the disputed domain names.

The disputed domain names contain the Complainant’s registered LANCASTER trademark in its entirety, without any authorization or approval, and this is the only distinctive component of the disputed domain names.

The disputed domain names were registered many years after the Complainant’s trademark was registered. In addition, owing to the substantial presence established worldwide and on the Internet by the Complainant, and the use of the disputed domain names to sell purported LANCASTER-branded goods, it is apparent that the Respondent was aware of the existence of the Complainant’s trademark when registering the disputed domain names.

Therefore, it is more likely than not that the Respondent, when registering the disputed domain names, had knowledge of the Complainant’s earlier rights to the LANCASTER trademark and name and targeted those.

It thus appears that the Respondent registered the disputed domain names to misleadingly attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant’s trademark as to the source, sponsorship, affiliation or endorsement of the Respondent’s websites and products, and this shows bad faith registration and use of the disputed domain names.

In addition, panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4.

The bad faith registration and use of the disputed domain names are further supported by the Respondent's failure to deny the Complainant's allegations of bad faith in this proceeding.

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 <jerusalemlancaster.com>, <lancastercanada.net>, and <lancastertürkiye.com> [xn----lancastertrkiye-8vb.com] be transferred to the Complainant.

/Fabrizio Bedarida/

Fabrizio Bedarida

Sole Panelist

Date: January 28, 2026