

ADMINISTRATIVE PANEL DECISION

LEO Pharma A/S v. Reg Osborne
Case No. D2025-5110

1. The Parties

Complainant is LEO Pharma A/S, Denmark, represented by Zacco Sweden AB, Sweden.

Respondent is Reg Osborne, Germany.

2. The Domain Name and Registrar

The disputed domain <leo-phamra.com> is registered with Name SRS AB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 9, 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 10, 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 (Protected Protected, Shield Whois) and contact information in the Complaint. The Center sent an email communication to Complainant on December 10, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on December 10, 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 Respondent of the Complaint, and the proceedings commenced on December 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 1, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on January 7, 2026.

The Center appointed Lorelei Ritchie as the sole panelist in this matter on January 12, 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

Complainant is a multinational company based in Denmark. For decades prior to the registration of the disputed domain name, beginning in 1908, Complainant has offered pharmaceutical products and services under the LEO mark along with the marks LEO PHARMA and LEO-PHARMA. Complainant owns numerous trademark registrations for these marks globally. Complainant's trademark registrations include, among others, Danish Registration Nos. VR 1909 00294 (registered June 19, 1909) for LEO; VR 2000 04368 (registered September 21, 2000) for LEO PHARMA and VR 2000 04370 (registered September 21, 2000) for LEO-PHARMA.

The disputed domain name was registered on September 15, 2025. The disputed domain name is not currently linked to an active website. Complainant contends Respondent did not respond to Complainant's cease and desist letters, and has not established any affiliation with Complainant, nor any license to use its marks.

5. Parties' Contentions

A. Complainant

Complainant contends that (i) the disputed domain name is identical or confusingly similar to Complainant's trademarks, (ii) Respondent has no rights or legitimate interests in the disputed domain name; and (iii) Respondent registered and is using the disputed domain name in bad faith.

Specifically, Complainant contends that it owns rights to the marks LEO, LEO PHARMA, and LEO-PHARMA, for which Complainant has established a global reputation with annual revenue of DKK 12.5 billion as of 2024, with 4,700 employees worldwide, and with over 100 million annual consumers. Complainant contends that the disputed domain consists only of a deliberate and common misspelling of Complainant's LEO-PHARMA mark, which is likely intended to defraud consumers looking for Complainant's official website at "www.leo-pharma.com". Complainant contends that Respondent lacks rights or legitimate interest in the disputed domain name, and rather has registered and is using it in bad faith, having simply acquired the disputed domain name for Respondent's own commercial gain.

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

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 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. Complainant has shown rights in respect of the marks LEO, LEO PHARMA, and LEO-PHARMA, for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds that this misspelling by Respondent does not prevent a finding of confusing similarity between the disputed domain name and Complainant's mark for purposes of the Policy. [WIPO Overview 3.0](#), section 1.9.

The Panel therefore finds that the disputed domain name is confusingly similar to a trademark in which Complainant has rights in accordance with paragraph 4(a)(i) of the Policy.

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.

Complainant has established rights to the mark recognizable in the disputed domain name, and Respondent has not responded with any valid claim to use those terms. Moreover, Respondent is not commonly known by the disputed domain name, and is not using the disputed domain name in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use. The Panel finds that Complainant has provided sufficient evidence of Respondent's lack of "rights or legitimate interests" in accordance with paragraph 4(a)(ii) of the Policy, which Respondent has not rebutted.

C. Registered and Used in Bad Faith

There are several ways that a complainant can demonstrate that a domain name was registered and used in bad faith. As noted in Section 4 of this Panel's decision, the disputed domain name is not currently linked to an active website. It is nevertheless well established that having a passive website does not necessarily shield a respondent from a finding of bad faith. See [WIPO Overview 3.0](#), section 3.3, which notes that the "non-use of a domain name" does not necessarily negate a finding of bad faith.

Rather, a panel must examine "the totality of the circumstances", including, for example, whether a complainant has a well-known trademark, and whether a respondent conceals his/her identity and/or replies to the complaint. Respondent here provided purportedly false contact information to the Registrar (with a mailing address deemed undeliverable by DHL). Respondent furthermore did not respond to Complainant's cease and desist letters, nor to Complainant's allegations in this proceeding.

Complainant has established prior rights in the marks LEO, LEO PHARMA, and LEO-PHARMA, with evidence of a significant global presence over many years. The disputed domain name consists merely of a misspelling of Complainant's LEO-PHARMA mark and of Complainant's official website address. Thus, given the apparent distinctiveness and reputation of Complainant's marks, and the composition of the disputed domain name, the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

The Panel finds sufficient evidence that Respondent registered and used the disputed domain name in bad faith for purposes of paragraph 4(a)(iii) 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 <leo-phamra.com> be transferred to Complainant.

/Lorelei Ritchie/

Lorelei Ritchie

Sole Panelist

Date: January 26, 2026