

ADMINISTRATIVE PANEL DECISION

DVMB Darrois Villey Maillot Brochier v. Marc Max and Renald Talon
Case No. D2025-5161

1. The Parties

The Complainant is DVMB Darrois Villey Maillot Brochier, France, represented by IP Twins, France.

The Respondents are Marc Max, France and Renald Talon, France.

2. The Domain Names and Registrar

The disputed domain names <darroisvmb.com> and <lawdvmb.com> are registered with CloudFlare, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 11, 2025. On December 11, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On December 12, 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 (Data Redacted) 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, 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 15, 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 17, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 6, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on January 13, 2026.

The Center appointed Vincent Denoyelle as the sole panelist in this matter on January 22, 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 is a reputable French law firm trading under the name Darrois Villey Maillot Brochier since at least 1987.

The Complainant's firm is registered with the French company register as Darrois Villey Maillot Brochier (DVMB) and has produced evidence of the fact that both Darrois Villey Maillot Brochier and DVMB are used extensively in association with the Complainant's services.

The disputed domain name <darroisvmb.com> was registered on August 6, 2025, and the disputed domain name <lawdvmb.com> was registered on September 18, 2025. The disputed domain names do not point to any active website and both were used to facilitate the sending of highly similar fraudulent emails impersonating the Complainant, in an effort to defraud unsuspecting recipients.

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 it has unregistered trade mark rights in the terms Darrois Villey Maillot Brochier and DVMB and that the disputed domain names are confusingly similar to such trade marks.

The Complainant states that it found no evidence whatsoever that the Respondents are known by the disputed domain names. The Complainant adds that it has not authorized the use of its earlier trade marks or terms similar thereto in the disputed domain names in any manner or form. Further, the Complainant points to the fact that the Respondents have not, before the original filing of the Complaint, used or made preparations to use the disputed domain names in relation to a bona fide offering of goods or services given that both disputed domain names are actively used in relation to a sophisticated fraud scheme involving the impersonation of several people, including senior executives of the Complainant.

Turning to bad faith, the Complainant contends that the Respondents necessarily had the Complainant's name and trade marks in mind when registering the disputed domain names. The Complainant then points to the use of the disputed domain names to fraudulently impersonate the Complainant to seek to defraud Internet users as a clear indication of bad faith use on the part of the Respondents. Finally, the Complainant claims that, by registering several disputed domain names reproducing its earlier marks, the Respondents have entered into a pattern of behavior, preventing the Complainant from reflecting its marks in the corresponding domain names.

B. Respondents

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

6. Discussion and Findings

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.

As regards common control, the Panel notes that both disputed domain names were used in an almost identical manner to send highly similar fraudulent emails impersonating the Complainant and the same senior member of staff of the Complainant which is persuasive evidence that the disputed domain names are owned by the same entity or mere alter egos of each other, or 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

Under paragraph 4(a)(i) of the Policy, the Complainant needs to demonstrate that the disputed domain names are identical or confusingly similar to a trade mark or service mark in which the Complainant has rights. It is established that under the Policy, the expression "trade mark or service mark" as used in paragraph 4(a)(i) of the Policy encompasses both registered and unregistered (sometimes referred to as common law) marks (see sections 1.1.1 and 1.3 of [WIPO Overview 3.0](#)).

The Panel thus needs to determine whether there is a sufficient case to find, on balance and for the purpose of the Policy, that the Complainant has unregistered trade or service mark rights in DARROIS VILLEY MAILLOT BROCHIER and DVMB reproduced in the respective disputed domain names.

The Complainant provided sufficient evidence of the fact that both terms "Darrois Villey Maillot Brochier" and "DVMB" are (i) the terms under which the Complainant has been trading as a law firm for many years and (ii) are extensively used as distinctive identifiers which the relevant consumers would associate with the Complainant's services, on the Complainant's website, in industry rankings, newspaper articles, etc. An Internet search using the Google search engine also indicates a very close association between the terms "Darrois Villey Maillot Brochier" and "DVMB" and the Complainant.

In addition, the Complainant has produced evidence of emails exchanged between the Respondent and an undisclosed party where the Respondent impersonated the Complainant using an email address under each of the disputed domain names. The fact that the Respondent is shown to have passed itself off as the Complainant and to have been clearly targeting the Complainant's business names "Darrois Villey Maillot Brochier" and "DVMB" supports the Complainant's assertion that such names have achieved some level of recognition as a source identifier for the purpose of the Policy (see *Gateway Fiber LLC v. Wix.com Ltd.*,

Wix.com Ltd. / Ali Oudah, Ayadi Group, WIPO Case No. [D2021-1736](#) and section 1.3 of [WIPO Overview 3.0](#)).

In light of the above, the Panel finds, on balance, that the Complainant has established unregistered trade or service mark rights in DARROIS VILLEY MAILLOT BROCHIER and DVMB respectively reproduced in the disputed domain names, for the purpose of the Policy.

The second point that has to be considered is whether the disputed domain names are identical or confusingly similar to the unregistered trade marks DARROIS VILLEY MAILLOT BROCHIER and DVMB.

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 trade mark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7. The Complainant has shown rights in respect of trade marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds that each trade mark of the Complainant is recognizable within the respective disputed domain names. Accordingly, the disputed domain names are confusingly similar to the DARROIS VILLEY MAILLOT BROCHIER and DVMB trade marks respectively, for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms here, for the disputed domain name <lawdvmb.com>, "law", 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 name <lawdvmb.com> and the DVMB unregistered trade mark of the Complainant, 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.

The Panel finds that the use of the disputed domain names to fraudulently impersonate the Complainant for financial gain is a clear indication of the Respondent's lack of rights or legitimate interest in the disputed domain names. Indeed, as previous panels under the Policy have consistently found, such illegal use can never be considered bona fide, legitimate or fair under the Policy. See [WIPO Overview 3.0](#), section 2.13.1.

Furthermore, the nature of the disputed domain names, comprising the Complainant's unregistered trade marks in their entirety and for one disputed domain name, in combination with an additional term corresponding to the Complainant's sector, carries a risk of implied affiliation. See section 2.5.1 of the [WIPO Overview 3.0](#).

Thus, the Panel finds that the Respondent has no rights or legitimate interests in respect of the disputed domain names.

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.

Given the circumstances described in the Complaint and the documentary evidence provided by the Complainant, the Panel finds that the disputed domain names were registered in bad faith. The disputed domain names reproduce the unregistered trade marks DARROIS VILLEY MAILLOT BROCHIER or DVMB of the Complainant and this cannot be a coincidence given the overall circumstances of the present case including: (i) the fact that DARROIS VILLEY MAILLOT BROCHIER and DVMB have no generic meaning to the best of the Panel's knowledge and, (ii) the choice of term added to one of the disputed domain names which corresponds to the Complainant's professional sector and (iii) the fact that the Complainant has been trading for decades under the names DARROIS VILLEY MAILLOT BROCHIER and DVMB.

Thus, the Panel finds that the disputed domain names were registered in bad faith.

As for use of the disputed domain names in bad faith, given the circumstances described in the Complaint and the evidence provided by the Complainant, the Panel considers that the disputed domain names are used in bad faith.

The use of the disputed domain names to facilitate the sending of fraudulent emails impersonating the Complainant and one of its senior staff members is very persuasive and clear evidence of the Respondent's bad faith use of the disputed domain names. Panels have held that the use of a domain name for illegal activity (e.g., phishing, impersonation/passing off, or other types of fraud) constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

Thus, the Panel finds that the disputed domain names have been registered and are also being used in bad faith.

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 <darroisvmb.com> and <lawdvmb.com> be transferred to the Complainant.

/Vincent Denoyelle/

Vincent Denoyelle

Sole Panelist

Date: February 2, 2026