ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Compagnie Générale des Etablissements Michelin v. Ivan Mazov
Case No. D2025-5173

1. The Parties

The Complainant is Compagnie Générale des Etablissements Michelin, France, represented by Dreyfus & associés, France.

The Respondent is Ivan Mazov, Russian Federation.

2. The Domain Name and Registrar

The disputed domain name <promo-michellin.com> is registered with NameCheap, 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 name. On December 12, 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 (Privacy Service Provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 12, 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 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 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, 2026.

The Center appointed Christelle Vaval as the sole panelist in this matter on January 21, 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, Compagnie Générale des Etablissements Michelin, is a company existing under the laws of France. The Complainant is a leading tire company operating under the name “Michelin” and present in more than 170 countries.

The Complainant owns the Trademark MICHELIN in multiple jurisdictions, including the United States of America Trademark Reg. No. 4126565, (registered on April 10, 2012) (the “Trademark”). The Complainant also owns the domain name <michelin.com> since 1993.

The disputed domain name was registered on November 6, 2025, well after the Complainant registered its Trademark. The disputed domain name does not resolve to an active website.

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 the disputed domain name is confusingly similar to the Complainant's MICHELIN Trademark, as it fully incorporates the MICHELIN Trademark with the addition of the letter “l”, which the Complainant characterizes as typosquatting.

The Complainant further contends that the Respondent lacks legitimate interests as it is not known by the disputed domain name, has no connection with the Complainant, and is not authorized to use the MICHELIN Trademark. The disputed domain name is inactive and contains no evidence of legitimate use. The Respondent did not reply to the Complainant’s cease-and-desist letter or subsequent reminders.

Finally, the Complainant asserts that, due to the MICHELIN Trademark’s global reputation and prior trademark and domain name registrations, the Respondent should have known of its rights when registering the disputed domain name. The disputed domain name is a “typosquatting” variant of the MICHELIN Trademark, with the addition of the letter “l” and the generic term “promo,” implying promotional activities. The Complainant further states that passive holding does not, in itself, rule out bad faith, especially when involving a well-known trademark.

B. Respondent

The Respondent did not reply to the 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 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 Panel finds the mark is recognizable 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.

The Complainant has demonstrated registered rights in the MICHELIN mark in multiple jurisdictions. The disputed domain name <promo-michellin.com> differs from the Complainant's Trademark only by the insertion of an extra "l", which consists of a common, obvious misspelling of the Complainant's trademark, and the addition of the term "promo".. WIPO Overview 3.0, section 1.8.

Under the Policy, the first element involves determining whether the domain name is identical or confusingly similar to a mark in which the complainant holds rights (Policy, paragraph 4(a)(i)). It is well established that the TLD is disregarded in this comparison (WIPO Overview 3.0, section 1.11.1). Additionally, a domain name that is a common misspelling of a mark (i.e., "typosquatting") is considered confusingly similar (WIPO Overview 3.0, section 1.9).

Although the addition of other terms here, "promo" 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 and the mark for the purposes of the Policy (WIPO Overview 3.0, section 1.8).

Accordingly, 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 name. 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 name such as those enumerated in the Policy or otherwise.

The Complainant has made a prima facie case that the Respondent lacks rights or legitimate interests, shifting the burden to the Respondent (WIPO Overview 3.0, section 2.1). The Respondent concealed their identity, provided false contact details, and the disputed domain resolves to an error page. There is no evidence that the Respondent is commonly known by the disputed domain name or is making a bona fide or fair use per paragraph 4(c) of the Policy. The Respondent is not affiliated with the Complainant, was not authorized to use the MICHELIN Trademark, and did not reply to the Complainant's cease-and-desist communications.

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.

The following circumstances suggest, on the balance of probabilities, that the disputed domain name was registered and used in bad faith:

- Given the global reach of the Internet and search engines, along with the Complainant's worldwide presence and trademark recognition as one of the top tire brands, the Panel considers it is more likely than not that the Respondent was aware of the Complainant's famous trademark when registering the disputed domain name.

- The Respondent registered the disputed domain name, which incorporates the Complainant's well-known trademark MICHELIN with a typographical variation, double "l"; this does not alter the appearance or pronunciation of the Complainant's Trademark. Furthermore, the term "promo,“ suggesting promotional offers creates a likelihood of confusion with the Complainant's Trademark, potentially misleading Internet users into believing the disputed domain name is associated with the Complainant for commercial gain.

- The disputed domain name resolves to a default index.html page, which is automatically generated by the system and does not demonstrate any actual or contemplated good-faith use. WIPO Overview 3.0, section 3.3.

- The Respondent used a privacy service to conceal his identity.

- The records show that the Respondent did not react to any of the Complainant's cease-and-desist letters, nor the Center's communications.

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.

Panels have found that the non-use of a domain name, including a blank or "coming soon" page, 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 or reputation of the Complainant's trademark, and the composition of the disputed domain name, and 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 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 <promo-michellin.com> be transferred to the Complainant.

/Christelle Vaval/
Christelle Vaval
Sole Panelist
Date: February 4, 2026