

ADMINISTRATIVE PANEL DECISION

PRL USA Holdings, Inc., The Polo/Lauren Company L.P. v. A A, Ventes Privees Ralph, Host Master, Njalla Okta LLC
Case No. D2025-5299

1. The Parties

The Complainants are PRL USA Holdings, Inc. and The Polo/Lauren Company L.P., United States of America, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondents are A A. Ventes Privees Ralph, France and Host Master, Njalla Okta LLC, Saint Kitts and Nevis (hereinafter, the "Respondent").

2. The Domain Names and Registrar

The disputed domain names <ralph-private-sales.com> and <ralph-ventes-privees.com> are registered with Tucows Domains Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on December 18, 2025. On December 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On December 18, 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 (Contact Privacy Inc. Customer 0175974323 and Redacted for Privacy) and contact information in the Complaint.

The Center sent an email communication to the Complainants on December 19, 2025, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainants to either file separate complaints 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 Complainants filed an amended Complaint on December 22, 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 Respondents of the Complaint, and the proceedings commenced on December 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 19, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondents' default on January 21, 2026.

The Center appointed Kiyoshi Tsuru as the sole panelist in this matter on January 28, 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 Complainants are fashion companies which operate under the brand and trademark RALPH LAUREN since 1967 and own trademarks across diverse jurisdictions. The trademarks relevant to this matter are:

TRADEMARK	JURISDICTION	REGISTRATION NUMBER	REGISTRATION DATE	CLASS(ES)
RALPH	United States of America	256674	June 16, 1962	25
RALPH	France	95584574	August 11, 1995	25
RALPH	United States of America	2175394	July 21, 1998	9
RALPH	Canada	TMA504159	November 17, 1998	25
RALPH	European Union	004393187	May 18, 2006	3
RALPH LAUREN	France	1438048	May 6, 1988	3
RALPH LAUREN	European Union	002730323	August 18, 2003	35
	United States of America	2823094	March 16, 2004	18, 25

The Complainants promote their products predominantly through their primary domain name, <ralphlauren.com>, registered on September 25, 1996.

The Respondent registered the disputed domain names on August 22, 2025, and August 29, 2025, respectively.

The disputed domain name <ralph-ventes-privees.com> was being used to sell RALPH LAUREN branded merchandise, which suggests that the Respondent intended the disputed domain name to be confusingly similar to the Complainant's trademark as a means of furthering consumer confusion. On the other hand, the disputed domain name <ralph-private-sales.com> resolved to a defunct Shopify page and was not being used.

5. Parties' Contentions

A. The Complainants

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 the following:

I. Identical or Confusingly Similar

That their registrations grant them exclusive rights to the RALPH and RALPH LAUREN trademarks (WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.2.1.).

That the generic Top-Level Domain ("gTLD") ".com" should not be considered when comparing the Complainants' RALPH trademarks and the disputed domain names ([WIPO Overview 3.0](#), section 1.11.1.).

That the Respondent has incorporated in the disputed domain names the generic and descriptive term "ventes privées", and the English translation thereof, "private sale", respectively, which, in addition to the reproduction of the mark RALPH therein, result in confusing similarity ([WIPO Overview 3.0](#), section 1.8).

II. Right or Legitimate Interests

That the granting of several registrations for the RALPH and RALPH LAUREN trademarks constitutes prima facie evidence of the exclusive rights of the Complainants to said trademarks.

That the Respondent has no rights or legitimate interests in respect of the disputed domain names, as it has not been authorized by the Complainants, is not commonly known by the disputed domain names, and is using the disputed domain names to impersonate the Complainants and mislead Internet users.

That the Respondent is not making any bona fide or legitimate use of the disputed domain name <ralph-ventes-privees.com>. That, by using the Complainants' Polo Player logo and RALPH LAUREN mark on the website to which said domain name resolves, the Respondent has exploited the goodwill of the Complainant's brands, and has misled consumers, which constitutes a passing off conduct. That such conduct of imitation cannot qualify as a bona fide offering under paragraph 4(c)(i) or fair use under paragraph 4(c)(iii) of the Policy. That, the Respondent has failed to meet the criteria applicable to the Oki Data test, as the website does not accurately disclose the lack of a relationship with the Complainants.

That the Respondent's use of the disputed domain name <ralph-ventes-privees.com> contributes to the confusion. That the Respondent has used the disputed domain name to sell RALPH LAUREN branded merchandise, which suggests that the Respondent intended for said domain name to be confusingly similar to the Complainants' trademark as a means of furthering consumer confusion ([WIPO Overview 3.0](#), section 1.15).

That the disputed domain name <ralph-private-sales.com> resolves to a defunct Shopify page lacking content. That the Respondent has failed to demonstrate any attempt to make any legitimate use of said domain name.

That the Respondent registered the disputed domain names on August 22, 2025, and August 29, 2025, respectively, which is significantly after the dates of registration of the Complainants' trademarks, as well as the registration of their primary domain name <ralphlauren.com>.

III. Registered and Used in Bad Faith

That the Complainants' prior registered trademarks RALPH and RALPH LAUREN are well-known internationally with trademark registrations across numerous countries.

That, by registering two domain names incorporating the Complainants' RALPH trademark along with the related term "ventes privées", and the English translation "private sale", respectively, the Respondent has created disputed domain names that are confusingly similar to the Complainants' trademark, as well as their <ralphlauren.com> domain name. That, therefore, the Respondent has demonstrated a knowledge of and familiarity with the Complainants' brand and business.

That the Respondent has used the disputed domain name <ralph-ventes-privees.com> to resolve to a website featuring the Complainants' "Polo Player" logo, while having purported to sell the Complainants' RALPH LAUREN branded merchandise. That the mark RALPH is so closely linked and associated with the Complainants, that the Respondent's use of this mark, or any minor variation of it, strongly implies bad faith.

That the disputed domain name <ralph-private-sales.com> currently resolves to a defunct Shopify page and is not being used. That past panels have set forth that passively holding a domain name can result in a finding of bad faith pursuant to paragraph 4(a)(iii) of the Policy.

B. The Respondent

The Respondent did not reply to the Complainants' contentions.

6. Discussion and Findings

Paragraph 4(a) of the Policy sets out the three requirements that the Complainants must prove in order to successfully request remedies:

- (i) that the disputed domain name is identical or confusingly similar to a trademark or service mark to which the complainant has rights;
- (ii) that the respondent has no rights or legitimate interests in connection to the disputed domain name; and
- (iii) that the disputed domain name has been registered and is being used in bad faith.

Given the Respondent's default and therefore, failure to specifically address the case merits as they relate to the three UDRP elements, the Panel may decide this proceeding based on the Complainants' undisputed factual allegations under paragraphs 5(f), 14(a), and 15(a) of the Rules (see *Talk City, Inc. v. Michael Robertson*, WIPO Case No. [D2000-0009](#), *Joseph Phelps Vineyards LLC v. NOLDC, Inc., Alternative Identity, Inc., and Kentech*, WIPO Case No. [D2006-0292](#); see also [WIPO Overview 3.0](#), section 4.3).

6.1 Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainants allege that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainants have requested the consolidation of the Complaint against the disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainants' 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 Complainants' 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 3.0](#), section 4.11.2.

As regards common control, the Panel notes that the disputed domain names were registered within a few days respectively, that they incorporate the same trademark RALPH, target the same Complainants, use equivalent descriptive terms in different languages, and were registered through the same Registrar using privacy services. The Panel finds these factors sufficient to establish common control, and that this finding is fair and equitable (see *M. Rothschild & Sons Limited and Banque Martin Maurel v. Xiamen PrivacyProtection Service Co. Ltd. / Yang hongjuan*, WIPO Case No. [D2016-2508](#)).

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants 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 Complainants' trademark and the disputed domain name ([WIPO Overview 3.0](#), section 1.7).

The Complainants have shown rights in respect of the RALPH and RALPH LAUREN trademarks for the purposes of the Policy ([WIPO Overview 3.0](#), section 1.2.1).

The disputed domain names entirely reproduce the Complainants' RALPH trademarks. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

It is also well established that the addition of the gTLD “.com” is considered a standard registration requirement and, thus, is generally disregarded under the first element confusing similarity test ([WIPO Overview 3.0](#), section 1.11.1).

The additional terms “ventes privées” and “private sales” do not prevent a finding of confusing similarity ([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 Complainants have established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names. The Respondent has not rebutted the Complainants' 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.

In the present case, the Panel considers that using a domain name for illegitimate activity, such as <ralph-ventes-privees.com> claimed as applicable to this case impersonation/passing off can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

Furthermore, the Panel considers that the disputed domain name <ralph-private-sales.com>, which resolves to a defunct Shopify page, does not imply any bona fide offering of goods or services or legitimate noncommercial or fair use under paragraph 4(c) of the Policy.

Therefore, 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 Complainants have ascertained their rights over the RALPH trademarks. The dates of registration of said trademarks significantly precede the dates of registration of the disputed domain names ([WIPO Overview 3.0](#), section 3.1.4).

The Panel finds that the Respondent has intentionally attempted to attract Internet users to the disputed domain name <ralph-ventes-privees.com> for commercial gain by creating a likelihood of confusion with the Complainants' trademarks, within the meaning of paragraph 4(b)(iv) of the Policy. The Panel finds that the Respondent registered the disputed domain name with full knowledge of the Complainants and their RALPH and RALPH LAUREN trademarks. The composition of the disputed domain name, together with the use of the Complainants' trademarks on the website to which the disputed domain name <ralph-ventes-privees.com> resolves, demonstrates clear targeting.

Panels have held that the use of a domain name for illegitimate activity here, claimed as impersonation/passing off, constitutes bad faith ([WIPO Overview 3.0](#), section 3.4). Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name <ralph-ventes-privees.com> constitutes bad faith under the Policy.

The disputed domain name <ralph-private-sales.com> resolves to an inactive Shopify page. Panels have found that the non-use of a domain name 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 composition of this 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.

Therefore, the Panel finds that the Complainants have 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 <ralph-private-sales.com> and <ralph-ventes-privees.com> be transferred to the Complainants.

/Kiyoshi Tsuru/

Kiyoshi Tsuru

Sole Panelist

Date: February 11, 2026