

ADMINISTRATIVE PANEL DECISION

L'Oréal v. Amyra Michelle
Case No. D2026-0232

1. The Parties

The Complainant is L'Oréal, France, represented by Dreyfus & associés, France.

The Respondent is Amyra Michelle, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <lorealstudio.com> is registered with CloudFlare, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on January 21, 2026. On January 21, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 22, 2026, 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 (not disclosed) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 28, 2026, 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 January 29, 2026.

On January 29, 2026, the Respondent sent an email communication to the Center stating that it has no intention to use or keep the disputed domain name. On January 30, 2026, the Center sent an email communication to both parties regarding a possible settlement. On February 3, 2026, the Complainant requested suspension of the administrative proceeding. On February 4, 2026, the Center suspended the proceeding. On March 6, 2026, the Complainant requested reinstatement of the administrative proceeding.

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 March 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 1, 2026. The Respondent did not submit any formal response.

The Center appointed Linda Chang as the sole panelist in this matter on April 17, 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 French industrial group specialized in the field of cosmetics and beauty and is the first cosmetics group worldwide. The Complainant has a portfolio of 36 brands managed across four divisions, with a presence in 150 countries. The Complainant employs 86,000 employees and operates 21 research centres globally.

The Complainant owns numerous trademark registrations for L'OREAL and L'ORÉAL, including:

- The European Union trademark L'OREAL Registration No. 018217416, registered on July 14, 2020, in classes 3 and 5;
- The International trademark L'OREAL Registration No. 1532645, registered on April 29, 2020, in classes 3 and 5;
- The United States trademark L'ORÉAL Registration No. 7302017, registered on February 13, 2024, in classes 3, 9, 35, and 41.

The Complainant owns the domain name <loreal.com> that incorporates its L'OREAL trademarks. The domain name was registered on October 24, 1997, and has been used as the Complainant's official website.

The Respondent is reportedly based in the United States. The disputed domain name was registered on October 22, 2025. Presently, the disputed domain name resolves to an inactive webpage. According to the Complainant's evidence, the disputed domain name redirected to the Complainant's official website at "www.loreal.com".

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 reproduces the trademark L'OREAL in its entirety. The addition of the generic term "studio" contributes to the false impression that the disputed domain name is officially linked to or operated by the Complainant, suggesting an official subdivision, program, or content platform belonging to Complainant. This is insufficient to avoid any likelihood of confusion. The ".com" generic Top-Level Domain ("gTLD") does not affect the likelihood of confusion. Therefore, the disputed domain name is confusingly similar to the Complainant's L'OREAL trademark;
- the Respondent is neither affiliated with the Complainant in any way nor has it been authorized by the Complainant to use its trademarks. The Respondent cannot claim prior rights or legitimate interest in the disputed domain name;
- the disputed domain name currently resolves to an inactive webpage. The Respondent has not made any reasonable and demonstrable preparations to use the disputed domain name. The disputed domain name previously redirected to the Complainant's official website at "www.loreal.com". Such redirection was clearly

intended to reinforce the false impression that the disputed domain name was connected with, endorsed by, or affiliated with the Complainant, thereby misleading Internet users as to the source and ownership of the disputed domain name.

- email servers have been configured on the disputed domain name and thus, there might be a risk that the Respondent is engaged in a phishing scheme;

- given the Complainant's goodwill and renown, and the nature of the disputed domain name, it is inconceivable that the Respondent did not have Complainant's trademark in mind at the time of registration of the disputed domain name;

- the disputed domain name is currently inactive. Passive holding does not preclude the finding of bad faith. The disputed domain name previously was used to redirect Internet users to the Complainant's official website. This redirection indicates that the Respondent deliberately sought to mislead Internet users as to the origin and legitimacy of the disputed domain name, thereby capitalizing on the Complainant's reputation and goodwill. This conduct constitutes clear evidence of the use of the disputed domain name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy. The Respondent has configured email servers on the disputed domain name, which could enable the Respondent to send emails appearing to originate from an address incorporating Complainant's trademark, thereby creating a significant risk of phishing or other fraudulent activities. In addition, it is likely that Respondent registered the disputed domain name to prevent the Complainant from using its trademarks in the disputed domain name.

B. Respondent

The Respondent did not formally reply to the Complainant's contentions. Before the commencement of the proceeding, the Respondent sent an email communication to the Center stating that it has no intention to either keep or use the disputed domain name.

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 Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

Based on the available records, the Complainant has shown rights in respect of the L'OREAL and L'ORÉAL trademarks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The gTLD ".com", as a standard registration requirement, should be disregarded in the assessment of confusing similarity under the Policy.

The disputed domain name incorporates the Complainant's L'OREAL and L'ORÉAL trademarks. While the apostrophe and accent marks are omitted and the term "studio" is included, the Complainant's L'OREAL and L'ORÉAL trademarks remain clearly recognizable in the disputed domain name. The Panel finds that the extra term does not prevent the finding of confusing similarity between the disputed domain name and the L'OREAL and L'ORÉAL trademarks.

Accordingly, the disputed domain name is confusingly similar to the Complainant's L'OREAL and L'ORÉAL trademarks for the purposes of the Policy. [WIPO Overview 3.1](#), sections 1.7 and 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 that 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 3.1](#), section 2.1.

The available record shows that:

- the Respondent is not affiliated with the Complainant and has not been authorized to use the Complainant's L'OREAL and L'ORÉAL trademarks in any form;
- there is no evidence proving that the Respondent holds any trademark rights corresponding to the disputed domain name, or has been commonly known by the disputed domain name;
- the disputed domain name resolves to an inactive website, without any actual use or demonstrable plan to use the disputed domain name by the Respondent, which cannot be deemed as bona fide offering of goods or services or a legitimate noncommercial or fair use. According to the Complainant's contention and evidence, the disputed domain name previously redirected to the Complainant's official website. The Respondent's such redirection activity indicates its intention to mislead Internet users into believing that the disputed domain name is operated or endorsed by the Complainant, which cannot be deemed as a bona fide offering of goods or services or a legitimate noncommercial or fair use. In addition, email servers have been configured on the disputed domain name, which might carry a risk that Respondent is using the disputed domain name in relation to phishing activity.
- the nature of the disputed domain name, incorporating the Complainant's L'OREAL and L'ORÉAL trademarks (omitting only the apostrophe and accent marks), together with the term “studio” that may suggest a subdivision and program of the Complainant, or a curated offering of the Complainant's products and services, carries a risk of implied affiliation with the Complainant; and
- no other factors demonstrate any rights or legitimate interests of the Respondent in the disputed domain name.

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 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.

In the present case, the Panel notes that the Complainant obtained the trademark registration for L'OREAL far predating the registration date of the disputed domain name (October 22, 2025). According to the Complainant's evidence, the Panel accepts that the Complainant and its L'OREAL and L'ORÉAL trademarks have gained a high reputation and recognition in numerous jurisdictions through its extensive use and advertising. The Respondent registered the dispute domain name that incorporates the Complainant's L'OREAL and L'ORÉAL trademarks. It is implausible to infer that the Respondent has registered the disputed domain name by coincidence, without any knowledge of the Complainant and its L'OREAL and L'ORÉAL trademarks. The disputed domain name previously redirected to the Complainant's official website. The Panel determines that the Respondent had actual knowledge of the Complainant and its L'OREAL and L'ORÉAL trademarks at the time of registering the disputed domain name, and bad faith is found.

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 3.1](#), section 3.2.1.

The disputed domain name resolves to an inactive website at the time of the Decision, but was once used to redirect to the Complainant's official website. The Panel holds that by selecting a domain name confusingly similar to the Complainant's L'OREAL and L'ORÉAL trademarks, and using it in the manner as described, the Respondent obviously has intended to attract, for commercial gain, Internet users to the disputed domain name by creating a likelihood of confusion with the Complainant's L'OREAL and L'ORÉAL trademarks as to the source, sponsorship, affiliation, or endorsement of the disputed domain name, which constitutes bad faith within the meaning of paragraph 4(b)(iv) of the Policy. In addition, the Respondent has configured email servers on the disputed domain name, which could create a risk of phishing or other fraudulent activities.

Given the Respondent's previous use of the disputed domain name, the current non-use of the disputed domain name does not prevent the Panel's finding of the Respondent's bad faith.

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 <lorealstudio.com> be transferred to the Complainant.

/Linda Chang/

Linda Chang

Sole Panelist

Date: May 1, 2026