

ADMINISTRATIVE PANEL DECISION

Compagnie Générale des Etablissements Michelin v. Chris Adams
Case No. D2026-0274

1. The Parties

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

Respondent is Chris Adams, United States of America (“United States”), self-represented.

2. The Domain Name and Registrar

The disputed domain name <bluecollarmichelin.com> is registered with Hostinger Operations, UAB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 23, 2026. On January 23, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 27, 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 Complainant on January 28, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on February 2, 2026.

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 February 4, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 24, 2026. Respondent sent email communications to the Center on January 28, 2026, and on February 5, 2026. The Response was filed with the Center on February 9, 2026. Complainant submitted a supplemental filing on February 12, 2026, followed by Respondent’s supplemental filing on February 15, 2026.

The Center appointed Stephanie G. Hartung as the sole panelist in this matter on March 9, 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 company organized under the laws of France that is active in the tire and gastronomy industries.

Complainant has provided evidence that it is the registered owner of various trademarks relating to its company name and brand MICHELIN, including, but not limited to, the following with protection for the United States:

- word trademark MICHELIN, United States Patent and Trademark Office (“USPTO”), registration number: 892045, registration date: June 2, 1970, status: active; and
- word and design trademark MICHELIN, USPTO, registration number: 3684424, registration date: September 15, 2009, status: active.

Moreover, Complainant has demonstrated to own various domain names reflecting its MICHELIN trademark, inter alia, since 1993 the domain name <michelin.com> which resolves to Complainant’s official website at “www.michelin.com”, promoting Complainant’s products and related services in the tire industry internationally.

Respondent, according to the Registrar verification, is located in the United States. The disputed domain name was registered on November 17, 2025, and resolves to a parked page operated by the Registrar.

Complainant requests that the disputed domain name be transferred to Complainant.

Respondent, in turn, requests that the Complaint be denied and that the Panel finds for a case of Reverse Domain Name Hijacking (“RDNH”).

5. Parties’ Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name. Notably, Complainant contends to be the number one company worldwide for tires, with roots going back to 1889 and presences nowadays in 170 countries, with more than 124,000 employees and operating 117 tire manufacturing facilities and sales agencies in 26 countries worldwide. Consequently, Complainant’s MICHELIN trademark is meanwhile globally well-known and famous.

Complainant submits that the disputed domain name is confusingly similar to Complainant’s well-known MICHELIN trademark, as it reproduces the latter in its entirety, together with the descriptive and generic term “blue collar”, commonly associated with manual and industrial labor sectors. Moreover, Complainant asserts that Respondent has no rights or legitimate interests in respect of the disputed domain name since (1) Respondent is not affiliated with Complainant in any way nor has it been authorized by Complainant to use and register its MICHELIN trademark, or to seek registration of any domain name incorporating the latter, (2) Respondent’s attempt to portray the expression “blue collar” as a neutral, generic, or abstract cultural reference unrelated to Complainant is inconsistent with its ordinary meaning in the English language and with established UDRP jurisprudence; rather, the meaning of the term “blue collar” directly aligns with Complainant’s core activities, (3) Complainant’s MICHELIN trademark precedes the registration of the disputed domain name for years, (4) Respondent has not made any reasonable and demonstrable

preparations to use the disputed domain name, apart from self-generated conceptual materials, Respondent has produced no objective, contemporaneous evidence of a bona fide business project, and it also fails to show any intention of noncommercial or fair use of the disputed domain name, and (5) the fact that Respondent offered the disputed domain name to Complainant for a purchase price of USD 500,000 confirms that the disputed domain name is being treated by Respondent as a commercial asset rather than as a good faith reference or descriptive use. Finally, Complainant argues that Respondent has registered and is using the disputed domain name in bad faith since (1) Complainant's MICHELIN trademark is well-known across the world, making it unlikely that Respondent was not aware thereof when it registered the disputed domain name, (2) Complainant's MICHELIN trademark is entirely reproduced in the disputed domain name, (3) Complainant's MICHELIN trademark's registration significantly predates the registration date of the disputed domain name, (4) it is clear from Respondent's own statements that the disputed domain name was registered with the intent to capitalize on the notoriety and attractiveness of Complainant's MICHELIN trademark, with a view to selling the disputed domain name for a substantial sum, (5) the disputed domain name resolves to a Registrar's default page, and (6) Respondent has attempted to sell the disputed domain name for a sum of USD 500,000, which is in excess of Respondent's out-of-pocket expenses in registering the disputed domain name.

B. Respondent

Respondent contends that Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name.

Respondent argues that the disputed domain name is not confusingly similar to Complainant's MICHELIN trademark as the latter is paired with the distinctive modifier "blue collar", forming a phrase that conveys a separate semantic identity. Moreover, Respondent submits that it has rights and legitimate interests in respect of the disputed domain name since (1) before notice of the dispute, Respondent commissioned branding materials reflecting an independent concept unrelated to Complainant's business, and (2) the logo developed in this context depicts working-class culinary imagery and contains no reference to tires, mobility services, or any field associated with Complainant. Finally, Respondent asserts that it has neither registered nor is using the disputed domain name in bad faith since (1) the disputed domain name has remained inactive apart from a default registrar page, (2) the registration of the disputed domain name forms part of a developing brand concept supported by demonstrable preparations, and (3) Respondent did not target Complainant's MICHELIN trademark, but was approached by Complainant.

The Panel notes that, in response to Complainant's cease-and-desist letter, Respondent further argued that the term "Michelin" was not used to suggest sponsorship, endorsement, or affiliation with Complainant. Rather, according to Respondent, it was used in a nominative or referential sense to describe a standard of quality, similar to established commercial expressions such as "Olympian," "Rolls-Royce-level," or "Wall Street-grade," none of which imply ownership, authorization, or association. Respondent further stated that its brand concept focuses on applying elite execution standards to non-luxury food categories and mass-market distribution.

In relation to its request to find for a case of RDNH, Respondent argues that the Complaint attempts to stretch the Policy beyond its intended purpose of addressing clear cybersquatting.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, Complainant carries the burden of proving:

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

6.1 Preliminary Issue: Acceptance of Supplemental Filings

On February 12, 2026, Complainant sent a supplemental filing to the Center, thereby commenting on the Response of February 9, 2026; Respondent, in turn, sent a supplemental filing to the Center on February 15, 2026.

Paragraphs 10 and 12 of the Rules grant the Panel sole discretion to determine the admissibility of unsolicited supplemental filings. While paragraph 10(d) states that: “The Panel shall determine the admissibility, relevance, materiality and weight of the evidence”, paragraph 12 provides that: “In addition to the complaint and the response, the Panel may request, in its sole discretion, further statements or documents from either of the Parties”. Further, WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.6 states that “unsolicited supplemental filings are generally discouraged, unless specifically requested by the panel”.

The Panel has decided to accept both Parties’ unsolicited supplemental filings but notes that doing so had no effect on the outcome of this case, and that both Parties were treated equally and fairly, consistent with the Panel’s obligations under paragraph 10 of the Rules.

Having said so, the Panel comes to the following Decision:

6.2 Substantive Issues

A. Identical or Confusingly Similar

First, 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 MICHELIN trademark and the disputed domain name. [WIPO Overview 3.1](#), section 1.7.

Complainant has shown rights in respect of its MICHELIN trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1. Also, the entirety of such trademark is reproduced within the disputed domain name, merely added by the terms “blue” and “collar”. Accordingly, the disputed domain name is confusingly similar to Complainant’s MICHELIN trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7. Although the addition of other terms (here, the terms “blue” and “collar”) may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain name and Complainant’s MICHELIN trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

The Panel, therefore, finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Second, paragraph 4(c) of the Policy provides a list of circumstances in which 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 3.1](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted Complainant's prima facie showing and has not come forward with sufficient relevant evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

The Panel finds that Respondent has not been authorized to use Complainant's MICHELIN trademark, either as a domain name or in any other way. Also, there is no reason to believe that Respondent's name somehow corresponds with the disputed domain name (paragraph 4(c)(ii) of the Policy) and Respondent neither claims nor appears to have any trademark rights associated with the terms "blue collar" and/or "michelin" on its own.

Moreover, the Panel notices that the disputed domain name so far has neither been actively used for a bona fide offering of goods or services nor in a legitimate noncommercial or fair way without intent for commercial (paragraph 4(c)(i) and (iii) of the Policy), but has been passively held instead, merely resolving to a parked page operated by the Registrar.

It is, however, a matter of debate between the Parties if Respondent has made at least "demonstrable preparations" to use the disputed domain name in connection with a bona fide offering of goods or services before it got any notice of this dispute which would demonstrate rights or legitimate interests in the disputed domain name (paragraph 4(c)(i) of the Policy). In this context, Respondent has provided the draft of a logo which shows a male person in a blue shirt together with a collection of kitchen tools subtitled "Blue Collar Michelin" and which, according to Respondent's contentions, "depicts working-class culinary imagery"; also, Respondent has provided the image of a social media post meant to prove that this logo was in use since as early as November 17, 2025, thus before Respondent got notice of this dispute. Other than that, no evidence is provided by Respondent e.g. in relation to a business plan, financial investments, other promotional materials such as a website, a letterhead or business cards etc. Rather, Respondent merely brought forward that it registered the disputed domain name "in connection with a planned brand centered on working-class culinary culture". Respondent's argument in registering the disputed domain name incorporating Complainant's MICHELIN trademark is to describe a standard of quality. The disputed domain name is composed of Complainant's famous MICHELIN trademark together with the expression "blue collar" which, as correctly pointed out by Complainant, is a well-established socio-economic descriptor encompassing industrial workers, factory employees, technicians, mechanics, craftsmen, and construction workers, and, therefore, is directly aligned with Complainant's core business in the tire industry. As such, the disputed domain name implies a risk of affiliation with Complainant; at least, the composition of the disputed domain name suggests ownership or endorsement by Complainant as the MICHELIN trademark owner, which cannot be considered as any kind of fair use of the disputed domain name. [WIPO Overview 3.1](#), section 2.5.1.

Turning to the website linked to the disputed domain name, the Panel finds that the disputed domain name resolves to a parking page and this does nothing to clarify the non-affiliation of the Parties. For the sake of completeness, the Panel wishes to express that the mere passive holding of the disputed domain name as such is not capable of conferring rights or legitimate interests of Respondent thereto, either.

Also, Respondent has not denied that it had knowledge of said trademark before the registration of the disputed domain name, but explicitly stated in its email communications with Complainant that if Complainant wishes to eliminate any perceived risk through acquisition, Respondent is open to a commercial resolution and that the disputed domain name is available for purchase at 500,000 USD, reflecting the disputed domain name's strategic and commercial value. UDRP panels, however, widely agree that claimed examples of demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods and services cannot be merely self-serving, but should be inherently credible and supported by pre-complaint evidence. [WIPO Overview 3.1](#), section 2.2. These pre-requisites here are clearly not fulfilled.

The Panel, therefore, finds the second element of the Policy has been established, too.

C. Registered and Used in Bad Faith

Third, 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.

UDRP 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. Having reviewed the available record, the Panel finds the non-use of the disputed domain name does not prevent a finding of bad faith in the circumstances of this proceeding. Although panelists will look at the totality of the circumstances in each case, factors that have been considered relevant in applying the passive holding doctrine include: (i) the degree of distinctiveness or reputation of the complainant’s mark, and (ii) the failure of the respondent to provide any evidence of actual or contemplated good-faith use. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes, inter alia, (1) the undisputed high distinctiveness or reputation of Complainant’s MICHELIN trademark, (2) the composition of the disputed domain name (which reproduces such trademark entirely, added by the expression “blue collar” which, as explained above, is directly aligned with Complainant’s core business in the tire industry), and (3) the absence of sufficient evidence brought forward by Respondent on any contemplated good faith use of the disputed domain name, and so concludes 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.

Having said so, it is clear from the available record that Respondent was aware of Complainant’s famous MICHELIN trademark when it registered the disputed domain name. Also, the Panel recognizes that the concept of bad faith under the UDRP is broadly understood to occur where a respondent takes unfair advantage of or otherwise abuses a complainant’s trademark (see [WIPO Overview 3.1](#), section 3.1). Thereby, circumstances indicating that a domain name was registered for the bad-faith purpose of e.g. selling it to a trademark owner can be highly fact-specific; the nature of the domain name (e.g., whether a domain name wholly incorporates the relevant trademark plus a term related to the complainant’s area of commercial activity) and the distinctiveness of the trademark at issue, among other factors, are relevant to this inquiry. Again, the disputed domain name is composed of Complainant’s famous MICHELIN trademark together with the expression “blue collar”, which is directly aligned with Complainant’s core business in the tire industry, absent any reliable explanation whatsoever given by Respondent as to why exactly it needed to rely on Complainant’s trademark as part of its business idea and logo, if not to somehow unduly profit from the reputation connected to the latter. Moreover, the Panel has well noted that Respondent, when approached by Complainant, immediately offered to sell the disputed domain name for an amount that likely exceeds the documented out-of-pocket expenses for the registration of the disputed domain name. These circumstances, taken all together, allow this Panel to conclude that it is at least more likely than not that Respondent registered the disputed domain name primarily for the purpose of trading off on Complainant’s famous MICHELIN trademark, such as for the potential sale of it to Complainant as the trademark owner, for valuable consideration in excess of Respondent’s documented out-of-pocket costs directly related to the disputed domain name, which, in turn, constitutes evidence of Respondent’s bad faith within the meaning of paragraph 4(b)(i) of the Policy.

The Panel, therefore, finds that Complainant has established the third element of the Policy, too.

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, <bluecollarmichelin.com>, be transferred to Complainant.

Given that this Complaint is successful, there is no basis to find for a case of RDNH whatsoever.

/Stephanie G. Hartung/

Stephanie G. Hartung

Sole Panelist

Date: March 23, 2026