

ADMINISTRATIVE PANEL DECISION

Etablissement Public du Musée du Louvre v. Arriola Pedro, The Walker Tours LLC

Case No. D2026-0359

1. The Parties

The Complainant is Etablissement Public du Musée du Louvre, France, represented by SIMON Associés, France.

The Respondent is Arriola Pedro, The Walker Tours LLC, Spain.

2. The Domain Name and Registrar

The disputed domain name <ticketsslouvre.com> is registered with OVH (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 28, 2026. On January 28, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 29, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which included additional registrant information. The Center sent an email communication to the Complainant on January 30, 2026, providing the registrant and contact information disclosed by the Registrar, and indicating that no formal action or reply was necessary on its part regarding this. The Complainant filed an amended Complaint on February 2, 2026.

On January 30, 2026, the Center informed the parties in Spanish and English, that the language of the registration agreement for the disputed domain name is Spanish. On February 2, 2026, the Complainant requested English to be the language of the proceeding. The Respondent did not submit any comment on the Complainant’s submission.

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 February 9, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 1, 2026. A third party presenting itself as “the Walker Tours” sent informal email communications to the Center on January 30, 2026, February 9, 2026, March 3 and March 6, 2026.

The Center appointed Luca Barbero as the sole panelist in this matter on March 13, 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 public administrative cultural institution created in 1992 and is responsible for the management, conservation, and promotion of the Louvre Museum in Paris, France, which was inaugurated in 1793 and is now the largest museum of art and antiquities in the world, famous for its exceptional collection of artworks and architecture.

The Complainant is the owner of several trademark registrations for LOUVRE and MUSEE DU LOUVRE, including the following, as per trademark certificates submitted as annexes to the Complaint:

- European Union trademark registration No. 009856923 for LOUVRE (figurative trademark), filed on March 31, 2011, and registered on October 27, 2011, in classes 3, 4, 6, 8, 9, 14, 16, 17, 18, 19, 20, 21, 24, 25, 28, 35, 40, 41, and 42;

- French trademark registration No. 3101430 for LOUVRE (word mark), filed on May 21, 2001, and registered on December 14, 2001, in classes 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, and 45;

- French trademark registration No. 3101431 for MUSEE DU LOUVRE (word mark), filed on May 21, 2001 and registered on December 21, 2001, in classes 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, and 45.

The Complainant is also the owner of the domain name <louvre.fr>, which was registered on July 16, 1995, and is using the third-level domain <ticket.louvre.fr> in connection with its official ticket sales website.

The disputed domain name <ticketslouvre.com> was registered on January 31, 2020, and is currently pointed to an error page. However, according to the screenshots submitted by the Complainant – which have not been contested by the Respondent – prior to the present proceeding, the disputed domain name resolved to a website featuring the LOUVRE and MUSEE DU LOUVRE marks and promoting the online sale of guided tour packages and tickets to several museums, including the Louvre Museum.

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 trademark LOUVRE in which the Complainant has rights, as it reproduces the trademark in its entirety with the mere addition of the dictionary term “tickets” and the generic Top-Level Domain (“gTLD”) “.com”.

The Complainant states that the Respondent does not have any rights or legitimate interests in respect of the disputed domain name or in the names “Louvre” and “Musée du Louvre,” which are the subject of several trademark registrations owned by the Complainant. The Complainant further states that the disputed domain name is not used to offer any goods or services in good faith and, on the contrary, deliberately creates confusion with the official activities of the Complainant, especially since the Complainant operates its official ticket sales website at <ticket.louvre.fr>.

The Complainant concludes that the Respondent is making unlawful and unfair commercial use of the disputed domain name, clearly intending to divert consumers for profit by creating confusion with the Complainant’s trademarks and tarnishing its image.

With reference to the circumstances evidencing bad faith, the Complainant indicates that considering the use of the disputed domain name in connection with a website offering tickets to the Louvre Museum and guided tours at very high prices, without the Complainant’s authorization, the Respondent registered and used the disputed domain name in bad faith. The Complainant points out that the tickets offered by the Respondent are either invalid or lack sufficient information for consumers, notably with regard to the language in which the guided tour is conducted.

The Complainant further asserts that, despite having sent two formal notices to the Respondent, on May 6, 2025 and December 8, 2025, in which the Respondent was made aware of the infringement of the Complainant’s Intellectual Property rights through the registration and use of the disputed domain name and was requested to cease any use of the Complainant’s trademark and copyrighted images, the Respondent did not comply or even respond to such communications.

The Complainant submits that the Respondent’s sole intention behind the use of the disputed domain name was to attract Internet users to its website by creating confusion with the Complainant’s trademarks and to sell tickets at high prices to consumers, presenting itself to them as the Louvre Museum, essentially with a view to disrupting the commercial operations of the Complainant and taking advantage of its reputation.

B. Respondent

No Response was submitted by the Respondent in reply to the Complainant’s contentions.

6. Discussion and Findings

6.1 Language of the Proceeding

The language of the Registration Agreement for the disputed domain name is Spanish. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including the fact that:

- i. the Respondent is able to understand the language of the Complaint as it appears to be based in the United States of America (“United States”), since a company named like the Respondent’s organization has its registered office in such country;
- ii. the disputed domain name has been redirected to a website which is fully accessible in English;
- iii. there would be potential injustice and undue delay if the Complainant were required to translate the complaint into Spanish, which is not the language of its country.

The Respondent did not make any specific submissions with respect to the language of the proceeding.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs (see [WIPO Overview 3.1](#), section 4.5.1).

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

6.2. Substantive Issues

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 3.1](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1. Indeed, the Complainant has provided evidence of ownership of valid trademark registrations for the trademark LOUVRE.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of the term "tickets" 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 3.1](#), section 1.8.

As to the gTLD ".com", it is viewed as a standard registration requirement and can be disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

Therefore, 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.

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 notes that there is no relation, disclosed to the Panel or otherwise apparent from the record, between the Respondent and the Complainant. The Respondent is not a licensee of the Complainant, nor has the Respondent otherwise obtained an authorization to use the Complainant's trademark.

Furthermore, there is no indication before the Panel that the Respondent is commonly known by the disputed domain name.

The Panel also finds that the Respondent has used the disputed domain name to take users to a website displaying the Complainant's trademarks LOUVRE and MUSEE DU LOUVRE and offering tickets to the Louvre Museum and guided tours at very high prices, without the Complainant's authorization, thereby creating a likelihood of confusion and association with the Complainant and its trademarks.

The core analysis here is therefore whether the disputed domain name, incorporating the Complainant's well-known trademark LOUVRE preceded by the term "tickets", is misleading and carries a risk of implied affiliation with the Complainant, or whether it can be considered fair use. Considering the term "tickets" may refer to services related to the trademark, namely, visits to the Complainant's museum, it is necessary for the Panel to further examine the broader facts and circumstances of the case – particularly including the associated website content – to assess potential respondent rights or legitimate interests is required. See [WIPO Overview 3.1](#), section 2.5.1 The Panel will in particular look at "whether it is clear to Internet users visiting the respondent's website that it is not operated by the complainant especially where this is readily apparent from the site look-and-feel and content (which may include the use of a reasonably clear and prominent/visible disclaimer)." See [WIPO Overview 3.1](#), section 2.5.2.

The Panel finds that the Respondent's website gives an unfair impression of affiliation considering: i) the "contact" link leads to a Google Maps image of the city of Paris with the Complainant's location highlighted. ; ii) while there is a small disclaimer at the bottom of the page, none of the replies at the "FAQ" link given any indication that the information is that of a third party but are presented in a way that give the impression of being official and coming from the Complainant; iii) similarly the "Gallery" shows only a few pictures of the property, and do not for example include any pictures of a third-party tour operator. The Panel also notes an email address of "feelthecitytours" which indicates that the disputed domain name is used to give the impression of a non-existent affiliation with the Complainant, whereas the apparent Respondent uses that "feelthecitytours" branding to list a number of destinations.

Therefore, the Panel finds the second element of the Policy has also 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 finds that, considering the trademark LOUVRE is famous worldwide and the Complainant has been promoting the LOUVRE museum and its associated services via the website at <louvre.fr> since several years before the registration of the disputed domain name, the Respondent knew or should have known of the Complainant's trademark when it registered the disputed domain name on January 31, 2020. [WIPO Overview 3.1](#) section 3.2.2. Indeed, considering the nature of the disputed domain name and its use, the Panel finds that the Respondent was actually aware of, and intended to target, the Complainant and its trademark.

The Panel also notes that, in view of the use of the disputed domain name to divert users to the website described above, featuring the LOUVRE and MUSEE DU LOUVRE marks and promoting the online sale of guided tour packages and tickets to several museums, including the Louvre Museum, the Respondent intentionally attempted to attract Internet users to its website, for commercial gain, by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation or endorsement of its website and the services provided therein, according to paragraph 4(b)(iv) of the Policy.

Therefore, the Panel finds that the Complainant has established the third element of the Policy as well.

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 <ticketslouvre.com> be transferred to the Complainant.

/Luca Barbero/

Luca Barbero

Sole Panelist

Date: March 27, 2026