

ADMINISTRATIVE PANEL DECISION

Compagnie Générale des Etablissements Michelin v. Ngoc Giau Thai Thi,
micheiln

Case No. D2026-0933

1. The Parties

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

The Respondent is Ngoc Giau Thai Thi, micheiln, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <micheiln.org> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 4, 2026. On March 5, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 5, 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 (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 6, 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 March 9, 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 the Respondent of the Complaint, and the proceedings commenced on March 10, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 30, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 31, 2026.

The Center appointed Erick Iriarte as the sole panelist in this matter on April 7, 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 Compagnie Générale des Etablissements Michelin, a leading tire company, which is specialized in mobility, sustainably, designing, and distributing tires, and related services and solutions for its clients' needs, providing digital services, maps, and guides for trips and travels, and developing high technology materials that serve the mobility industry.

The Complainant is the owner of several MICHELIN trademarks, including in the European Union, United States, and International Trademark Registrations, such as:

European Union Trade Mark MICHELIN, registration number 001791243, filed on August 3, 2000 and registered on October 24, 2001 in classes 6, 7, 12, 17, 28;

United States trademark MICHELIN, registration number 4126565, filed on January 19, 2011 and registered on April 10, 2012 in classes 36, 37, 39; and

International trademark MICHELIN registration number 771031, registered on June 11, 2001, duly renewed and covering goods and services in classes 5, 7, 8, 9, 10, 11, 12, 16, 17, 18, 20, 21, 24, 25, 39, and 42, and designating inter alia China, the Russian Federation, Iceland, Spain, Ukraine, Singapore, and Viet Nam.

The official website of the Complainant is hosted under the domain name <michelin.com>.

The disputed domain name was registered on December 13, 2025, and resolved to a parked page displaying pay-per-click links, later resolving to an inactive page.

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 a typosquatted version of the Complainant's MICHELIN trademark, the Respondent has no rights or legitimate interests in the disputed domain name, and the disputed domain name was registered and is being used in bad faith.

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 Select UDRP Questions ("[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.

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 3.1](#), section 1.7.

In this case, the alteration of the order of the letters “i” and “l” does not prevent a finding of confusing similarity between the disputed domain name and the MICHELIN trademark. [WIPO Overview 3.1](#), section 1.9.

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. While the Panel notes that the Respondent organization matches the composition of the disputed domain name, noting the reputation of the Complainant and the broader circumstances of this case, the Panel finds it more likely than not that the Respondent selected such organization name in order to falsely suggest a connection with the Complainant or in an attempt to circumvent this proceeding. Moreover, the Respondent has provided no specific credible evidence to suggest it is commonly known by the disputed domain name, nor otherwise responded to the Complaint.

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.

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 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and 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. In this regard, the Panel finds that the nature of the disputed domain name, being a typo of a widely-known mark, supports a finding of 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 <micheiln.org> be transferred to the Complainant.

/Erick Iriarte/

Erick Iriarte

Sole Panelist

Date: April 21, 2026