

ADMINISTRATIVE PANEL DECISION

John Paul Mitchell Systems v. Dillon Young
Case No. D2026-1905

1. The Parties

The Complainant is John Paul Mitchell Systems, United States of America (“United States”), represented by Adelman Matz P.C., United States.

The Respondent is Dillon Young, United States.

2. The Domain Name and Registrar

The disputed domain name <paulmitchels.com> is registered with Dominet (HK) Limited (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 1, 2026. On May 4, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 6, 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 (Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 7, 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 May 12, 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 May 15, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 4, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Parties of the Respondent’s default on June 10, 2026.

The Center appointed Ingrīda Kariņa-Bērziņa as the sole panelist in this matter on June 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, a company established in California, United States, markets professional hair care goods and services internationally. It is the proprietor of numerous trademark registrations, including the following:

- United States Trademark Registration No. 1680913 for PAUL MITCHELL (word mark), registered on March 31, 1992 for goods in classes 3, 16, 18, and 25, claiming a date of first use in 1986;
- United States Trademark Registration No. 7920308 for PAUL MITCHELL (word mark), registered on August 26, 2025 for goods in classes 8 and 11, claiming a date of first use in 2008.

The Complainant operates its primary business website at the domain name <paulmitchell.com>, where it offers its products for sale.

The disputed domain name was registered on January 6, 2026. At the time of the Complaint, it resolved to a website headlined "Paul Mitchell BEAUTY IN EVERY CURL" which purported to offer the Complainant's branded hair care products for sale. At the time of this Decision, it no longer resolved to an active website.

The record indicates that, on February 6, 2026, the Complainant submitted trademark and copyright infringement reports to the hosting provider and received confirmation that these reports were forwarded to the Respondent. The record does not reflect the Respondent's replies thereto.

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 incorporates the entirety of its PAUL MITCHELL mark, with a slight variation. The Respondent is not authorized by the Complainant to use its mark. The disputed domain name resolves to a website selling counterfeit PAUL MITCHELL products at low prices, displaying the Complainant's mark alongside photographs and artwork copied from the Complainant's website. The Respondent's only interest is to impersonate the Complainant to divert consumers to its website and misrepresent its counterfeit products as being associated with the PAUL MITCHELL marks for financial gain. The Respondent's failure to respond to notice letters is further evidence of bad faith.

B. Respondent

The Respondent did not reply to the Complainant's contentions.

6. Discussion and Findings

Paragraph 4(a) of the UDRP requires the Complainant to make out all three of the following:

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

Under paragraph 15(a) of the Rules, “[a] Panel shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable”.

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. The Panel finds that the removal of a letter “l” and the addition of a letter “s” is a misspelling of the Complainant’s mark and 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 1.9.

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.

The Panel notes the composition of the disputed domain name, which comprises a deliberate misspelling of the Complainant’s established PAUL MITCHELL mark. Together with the use to which it has been put, the Panel finds that the composition of the disputed domain name affirms the Respondent’s intention of taking unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant as to the origin or affiliation of the website at the disputed domain name.

There is no evidence that the Respondent is commonly known by the disputed domain name, nor that there are any circumstances or activities that would establish the Respondent’s rights therein. Rather, the disputed domain name resolves to a website displaying the Complainant’s mark, purporting to sell the Complainant’s goods at discounted prices, without disclosing its lack of relationship with the Complainant and copying instead certain portions of the Complainant’s own website. Under these circumstances, such use cannot establish rights or legitimate interests. See [WIPO Overview 3.1](#), sections 2.5.2 and 2.5.3.

Panels have held that the use of a domain name for illegitimate activity (here, claimed passing off) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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 finds that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's marks. The Complainant's rights in its PAUL MITCHELL mark predate the registration of the disputed domain name by over 30 years. The disputed domain name is a deliberate misspelling of the Complainant's mark. Noting, in addition, the use to which the disputed domain name has been put, the composition of the disputed domain name implies an intention to benefit from the reputation of the Complainant's mark. [WIPO Overview 3.1](#), section 3.1.4.

The disputed domain name directs Internet users to a website prominently featuring the Complainant's marks and purporting to offer for sale the Complainant's products. The website displays images of the Complainant's products and copies certain portions of the Complainant's own website, and features a copyright notice "© 2025 Paul Mitchell Reserved". Panels have held that the use of a domain name for illegitimate activity (here, claimed passing off) constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

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 <paulmitchels.com> be transferred to the Complainant.

/Ingrīda Kariņa-Bērziņa/

Ingrīda Kariņa-Bērziņa

Sole Panelist

Date: June 27, 2026