

ADMINISTRATIVE PANEL DECISION

Compagnie Générale Des Etablissements Michelin v. Quanlai Li
Case No. D2026-2051

1. The Parties

Complainant is Compagnie Générale Des Etablissements Michelin, France, represented by Tmark Conseils, France.

Respondent is Quanlai Li, Canada, self-represented.

2. The Domain Name and Registrar

The disputed domain name <michelinkeyhotels.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 May 13, 2026. On May 13, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 14, 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 (DATA REDACTED) and contact information in the Complaint. The Center sent an email communication to Complainant on May 20, 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 May 27, 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 May 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 16, 2026. The Response was filed with the Center on May 29, 2026.

The Center appointed Stephanie G. Hartung as the sole panelist in this matter on June 11, 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, inter alia, in the tourism, hospitality, restaurant and gastronomy industry.

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:

- word trademark MICHELIN, International Registration (World Intellectual Property Organization), registration number: 1254506, registration date: December 10, 2014, status: active;
- word trademark MICHELIN, United States Patent and Trademark Office, registration number: 5775734, registration date: June 11, 2019, 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 tourism, hospitality, restaurant and gastronomy industry internationally, including its famous "MICHELIN Guide" which is referred to at the website's subpage "guide.michelin.com". The MICHELIN Guide introduced a new distinction, the "MICHELIN Key", to recognize establishments that provide outstanding hotel and travel experiences.

Respondent, according to the Registrar verification, is located in Canada, while Respondent itself claims to be located in China. The disputed domain name was registered on November 11, 2025. By the time of the rendering of this Decision, it resolves to a website at "www.michelinkeyhotels.com", which directly links to hotels recognized by Complainant's "Michelin Guide's Key Program", thereby prominently displaying Complainant's MICHELIN trademark and a yellow key-symbol logo; furthermore, the website comprises a disclaimer, prominently attached at the top of the website's homepage notifying Internet users: "Independent & unofficial. Not affiliated with, endorsed by, or sponsored by Michelin. 'MICHELIN' and 'Michelin Keys' are trademarks of Michelin. For the official Michelin Guide, visit guide.michelin.com." Complainant, however, has demonstrated – and Respondent did not oppose to such demonstration – that this disclaimer was apparently only introduced on the website under the disputed domain name after the Complaint was filed. In addition, the Panel has undertaken some independent research through the web archive at "www.web.archive.org", according to which, just three days before the filing of the Complaint, the website under the disputed domain name contained the following wording: "Some links may earn us a commission at no cost to you."¹ The capture of Respondent's website submitted by Respondent also contains such wording.

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

Respondent, in turn, requests that the Complaint be denied.

¹ "<https://web.archive.org/web/20260510043458/https://www.michelinkeyhotels.com/>"

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 that it has used its MICHELIN trademark for more than a century and that the latter has meanwhile acquired strong reputation and status as a well-known trademark throughout many countries worldwide. With regard to its "Guide Michelin", Complainant points to the fact that it has recently introduced a new distinction, namely the "Michelin Key", which highlights establishments offering exceptional hotel and travel experiences, illustrated by a stylized key logo.

Complainant submits that the disputed domain name is confusingly similar to Complainant's MICHELIN trademark, as it reproduces the latter identically, together with the descriptive terms "key" and "hotels" which precisely target one of Complainant's core businesses. Moreover, Complainant asserts that Respondent has no rights or legitimate interests in respect of the disputed domain name since (1) Complainant has not authorized Respondent to identify itself to the public under its MICHELIN trademark, (2) the term "Michelin" is not a generic term, but a registered distinctive and famous trademark owned by Complainant, (3) over the decades, Complainant's "Guide Michelin" has established itself as the most internationally recognized marker of restaurant quality and has become a symbol of culinary excellence. Finally, Complainant argues that Respondent has registered and is using the disputed domain name in bad faith since (1) taking into consideration that MICHELIN is a well-known trademark, Respondent inevitably was aware of the existence of Complainant's prior rights therein when it registered the disputed domain name, (2) the website under the disputed domain name prominently displays Complainant's MICHELIN trademark and a key symbol similar to a key-shaped logo used by Complainant in connection with its newly introduced "Michelin Key" project, and (3) Respondent uses the disputed domain name in connection with a website which impersonates Complainant and which is being used as part of some form of dishonest and fraudulent scheme in order to make Internet users believe that they are in the presence of a website created by Complainant or approved/awarded by the MICHELIN trademark owner.

B. Respondent

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

In particular, Respondent submits that it does not impersonate Complainant, does not sell competing services, has never generated revenue from the disputed domain name, has never offered the disputed domain name for sale, and prominently and repeatedly identifies the website thereunder as independent and unofficial; therefore, the use of Complainant's MICHELIN trademark in the disputed domain name is nominative and necessary to identify the subject of the reference work, which is the "Michelin Key program" itself. Respondent contends that its website pairs Complainant's program with aggregated public traveler review signal from Google Reviews. Respondent further notes that the screenshots in Annex 8 of the Complaint capture an earlier state of the website under the disputed domain name; however, before the filing of its Response, and consistent with the good-faith editorial posture which Respondent has maintained throughout, it has further adjusted such website to remove the key-shaped glyph from the website's masthead and icons and to make the independent, non-Michelin authorship of its review summaries explicit (while the prior state of the website is preserved in the web archive known as "Wayback Machine" and is not concealed). Therefore, the website under the disputed domain name has no advertising, no affiliate links, no sponsorships, no paid placements, and has never generated revenue; further, Respondent does not solicit donations and there is no commercial nexus whatsoever between Respondent's activity and the disputed domain name. Finally, Respondent's conduct demonstrates good faith in that the website under the disputed domain name encompasses the following features: (1) site-wide and per-page disclaimers identifying the website as unofficial, (2) direct, prominent linking to Complainant's official Guide page from every listing, (3) removal of all monetization scaffolding from the codebase, (4) honest, editorial framing in all metadata, social cards, and structured data, and (5) provision of editorial value beyond Complainant's own offering (aggregated traveler review signal) rather than parasitic republication.

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.

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 of WIPO Panel Views on Select UDRP Questions ("[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 "key" and "hotels". 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 descriptive terms "key" and "hotels") 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, holds 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 any relevant evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

In particular, Respondent has not been authorized to use Complainant's undisputedly well-known MICHELIN trademark, either as a domain name or in any other way. Also, Respondent's name obviously does not correspond with the disputed domain name, and Respondent does not appear to have any trademark rights associated with the term "michelin" on its own. To the contrary, the disputed domain name resolves to a website at "www.michelinkeyhotels.com", which directly links to hotels recognized by Complainant's "Michelin Guide's Key Program", thereby prominently displaying Complainant's MICHELIN trademark without authorization to do so. Moreover, just three days before the filing of the Complaint, such website frequently

displayed a yellow key-symbol logo somewhat similar in style to the one used by Complainant, absent any disclaimer on the nonexistent relationship between the Parties. Finally, and by that time, the website informed Internet users of the following: “Some links may earn us a commission at no cost to you.” Such making use of the disputed domain name, therefore, neither qualifies as bona fide offering of services nor as legitimate noncommercial or fair use within the meaning of the Policy, not even so under the so-called “Oki Data” principles which would indeed have required Respondent, e.g. to accurately and prominently disclose on such website the nonexistent relationship between Respondent and Complainant as the MICHELIN trademark holder, which Respondent obviously did not. [WIPO Overview 3.1](#), section 2.8. In this context, the Panel has certainly noticed the significant changes that Respondent has made to this website after receiving the Complaint (e.g., the removal of the yellow key symbol and, in its place, the addition of a prominently placed disclaimer). However, in determining whether Respondent has rights or legitimate interests in the disputed domain name, the Panel would normally consider the date on which the Complaint was filed, not the date of the Response to the Complaint. [WIPO Overview 3.1](#), section 2.11. Here, the disclaimer was apparently absent at the time of the filing of the Complaint, and the website by then appeared to derive from Complainant itself which it obviously did not. Panels have long held that the use of a domain name for illegitimate/illegal activity (here, the claimed passing off) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1. Finally, the Panel notes that the composition of the disputed domain name, which incorporates Complainant’s trademark in its entirety along with the terms “key” and “hotels”, both of which relate to Complainant’s core business, carries a risk of implied affiliation with Complainant. Such composition cannot constitute fair use as it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. [WIPO Overview 3.1](#), section 2.5.1.

The Panel, therefore, holds 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.

The circumstances of this case leave no doubt that Respondent was fully aware of Complainant’s rights in its undisputedly well-known MICHELIN trademark when registering the disputed domain name and that the latter is clearly directed thereto. The composition of the disputed domain name alone, which combines the entirety of Complainant’s well-known MICHELIN trademark and the descriptive terms “key” and “hotels” which directly refer to one of Complainant’s core businesses, is evidence of Respondent’s full knowledge of Complainant’s business concept, inclusive of the most recent project called “Michelin Key”. Moreover, using the disputed domain name, which is at least confusingly similar to Complainant’s well-known MICHELIN trademark, to run a website at “www.michelinkeyhotels.com”, which directly links to hotels recognized by Complainant’s “Michelin Guide’s Key Program”, thereby prominently displaying Complainant’s MICHELIN trademark without authorization to do so, and frequently displaying a yellow key-symbol logo somewhat similar in style to the one used by Complainant, absent any disclaimer on the nonexistent relationship between the Parties, is a clear indication that Respondent intentionally attempted to attract, for commercial gain, Internet users to its own website by creating a likelihood of confusion with Complainant’s MICHELIN trademark as to the source, sponsorship, affiliation or endorsement of Respondent’s website. Such circumstances are evidence of registration and use of the disputed domain name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy. In this context, the Panel has specifically noted that, just three days before the filing of the Complaint, Respondent expressly informed Internet users that some links on the website under the disputed domain name were affiliate links, and that Respondent earned a “commission” for any clicks on and reservations made through those links. Against this background, Respondent’s claim that the disputed domain name was never being used for commercial purposes and did not contain any affiliate links must be considered refuted. Furthermore, Respondent has failed to provide any plausible explanation as to why it would operate the website under the disputed domain name if not to achieve certain commercial benefits; in any case, there is no evidence whatsoever that this is merely a noncommercial website without intention to trade off Complainant’s reputation. The Panel, therefore, characterizes the substantial changes that Respondent made to its website after receiving the Complaint as purely precautionary measures

intended to avoid losing the disputed domain name in these proceedings. The finding that the registration and use of the disputed domain name were in bad faith at the time the Complaint was filed is thus upheld. Finally, UDRP panels also have held that the use of a domain name for illegitimate/illegal activity (here, the claimed passing off) constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

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

/Stephanie G. Hartung/

Stephanie G. Hartung

Sole Panelist

Date: June 24, 2026