

ADMINISTRATIVE PANEL DECISION

L'Oréal v. Lucas Brown

Case No. D2026-2160

1. The Parties

The Complainant is L'Oréal, France, represented by Dreyfus & Associés, France.

The Respondent is Lucas Brown, Hong Kong, China.

2. The Domain Name and Registrar

The disputed domain name <lancomebetsl.com> is registered with OwnRegistrar, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 19, 2026. On May 19, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 20, 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 (WhoisSecure) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 22, 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 26, 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 28, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 17, 2026. The Center received an email communication from an email address having the email extension as identified by the Registrar in its verification response, on June 4, 2026. The Center informed the Parties about the commencement of panel appointment process on June 18, 2026.

The Center appointed Wilson Pinheiro Jabur as the sole panelist in this matter on June 30, 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 French industrial conglomerate specialized in the field of cosmetics and beauty products, present in 150 countries. One of its trademarks is LANCÔME which dates back to 1935.

The Complainant is the owner of the following, amongst other, trademark registrations (Annex 4 to the Complaint):

- United States of America trademark registration No. 3,022,836, for the word and device mark LANCÔME, registered on December 6, 2005, successively renewed, in class 3; and
- Brazilian trademark registration No. 790503263, for the word mark LANCÔME, registered on December 17, 1985, successively renewed, in class 3.

Past UDRP Panels have found the Complainant's LANCÔME trademark to be "well-known" or "famous" (*Lancôme Parfums Beauté et Cie v. 湖南澳利经贸发展有限公司*, WIPO Case No. [D2015-1071](#); *Lancôme Parfums Et Beauté & Cie v. He peng*, WIPO Case No. [D2014-1944](#); *Lancôme Parfums et Beauté & Cie Snc v. Value-Domain com, Value Domain*, WIPO Case No. [D2013-0518](#); and *L'Oréal and Lancôme Parfums et Beauté et Cie v. Deco Trends & Art, K. Plooyer*, WIPO Case No. [D2011-0524](#)).

The disputed domain name was registered on April 18, 2026, and presently resolves to an active webpage written in Portuguese, offering online betting services under the LANCÔME trademark.

Before initiating this procedure, the Complainant sent notifications to the Registrar and the hosting provider on April 29, 2026, requesting the blocking of the disputed domain name and the deactivation of the associated website, having received a confirmation that the message had been forwarded to the owner of the disputed domain name and further automated responses (Annex 6 to the Complaint).

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 asserts to own a portfolio of international brands that is unique in the world and that covers all the lines of cosmetics: hair care, coloring, skin care, make-up and perfume, amongst which is LANCÔME, the number one in anti-ageing skincare and viewed as a symbol of French refinement, enjoying a worldwide reputation.

Under the Complainant's view, the disputed domain name reproduces entirely the Complainant's LANCÔME trademark with the addition of the generic term "bets" and a letter "l", suggesting an affiliation with the Complainant or an official subdivision, campaign or regional branch of the Complainant, when in fact no such authorization or connection exists.

The Complainant further points out that the website that resolves from the disputed domain name displays online gambling content in Portuguese while prominently using the LANCÔME name in a manner that falsely suggests an affiliation or endorsement by the Complainant, thereby misleading Internet users, tarnishing the

Complainant's image, and raising serious concerns of phishing through the collection of users' personal information via a registration form (Annex 1 to the Complaint).

As to the Respondent's lack of rights or legitimate rights, the Complainant argues that the Respondent:

- is neither affiliated with the Complainant in any way nor has it been authorized by the Complainant to use and register its trademark, or to seek registration of any domain name incorporating said mark;
- has no prior rights or legitimate interests in the disputed domain name, also not being commonly known by the disputed domain name or by the LANCÔME name;
- has not demonstrated use of, or demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services, rather having used the disputed domain in connection with an online gambling website where users could place bets, what cannot be considered a legitimate commercial use; and
- has not used the disputed domain name in connection with any type of legitimate business or services, rather having used it to deceive consumers, who incorrectly understand that they are referred to the Complainant's bona fide goods and services.

Lastly, the Complainant argues that it is implausible that the Respondent was unaware of the Complainant's widely-known trademark when registering the disputed domain name, what suggests the Respondent's opportunistic bad faith. Furthermore, the use made of the disputed domain name in connection with a webpage that attempts to capitalize on the Complainant's reputation, deliberately seeking to cause confusion and undue association among Internet users for financial gain by creating a false association with the Complainant, further supports a finding of bad faith.

B. Respondent

The Respondent did not formally reply to the Complainant's contentions. On June 4, 2026, an e-mail was sent to the Center by what appears to be a Registrar that provides domain name services, but with no statements or arguments as to the merits of the case.

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. Although the addition of other terms here, "bets" and "I", 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 the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

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.

Under the Policy, paragraph 4(a)(ii), the Complainant has the burden of establishing that the Respondent has no rights or legitimate interests in the disputed domain name. According to the evidence submitted, the Complainant has made a *prima facie* case against the Respondent that it has not been commonly known by the disputed domain name and that the Respondent has not been authorized to register or use the disputed domain name.

Panels have held that the use of a domain name for illegal activity, such as passing off, or other types of fraud, as in this case, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

Also, according to the evidence submitted by the Complainant, the use made of the disputed domain name in connection with a gambling website that also collects users’ personal information via a registration form depicting the Complainant’s well-known trademark cannot be considered a legitimate or fair use of the disputed domain name. Furthermore, the Panel finds the nature of the disputed domain name carries a risk of implied affiliation with the Complainant and supports a finding that the Respondent lacks rights or legitimate interests in the disputed domain name. See [WIPO Overview 3.1](#), section 2.5.1.

Under these circumstances and absent evidence to the contrary, the Panel finds that the Respondent does not have rights or legitimate interests with respect to the disputed domain name.

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 this case, both the registration and use of the disputed domain name in bad faith can be found pursuant to the Policy, paragraph 4(b)(iv) in view of the reproduction of the Complainant’s trademark in the webpage available at the disputed domain name as well as the collection of users’ personal information via a registration form, which create a likelihood of confusion with the Complainant’s marks as to the source, sponsorship, affiliation, or endorsement thereof. [WIPO Overview 3.1](#), section 3.4.

For the reasons above, the Respondent's conduct has to be considered, in this Panel's view, as bad faith registration and use of the disputed domain name and Complainant succeeds under the third element of paragraph 4(a) of 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 <lancomebetsl.com> be transferred to the Complainant.

/Wilson Pinheiro Jabur/

Wilson Pinheiro Jabur

Sole Panelist

Date: July 9, 2026