

ADMINISTRATIVE PANEL DECISION

LEO Pharma A/S v. BHAV Group
Case No. D2026-2240

1. The Parties

The Complainant is LEO Pharma A/S, Denmark, represented by Zacco Sweden AB, Sweden.

The Respondent is BHAV Group, Germany.

2. The Domain Name and Registrar

The disputed domain name <leo-phama.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 25, 2026. On May 26, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 27, 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, Privacy Service Provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 29, 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 amendment to the Complaint on June 1, 2026.

The Center verified that the Complaint together with the amendment to the 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 June 4, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 24, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on June 26, 2026.

The Center appointed Mireille Buydens as the sole panelist in this matter on July 6, 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 global independent pharmaceutical company founded in Copenhagen, Denmark, in 1908 and specialized in medical dermatology. The company employs more than 4,700 employees around the world, generates an annual revenue of DKK 12,5 billion, and has about 100 million customers worldwide.

The Complainant is the owner of various trademark registrations for the LEO, LEO PHARMA and LEO-PHARMA marks in various jurisdictions, including, inter alia, the following registrations:

- Danish trademark registration No. VR 1909 00294 for LEO (word mark), registered on June 19, 1909;
- Danish trademark registration No. VR 2000 04368 for LEO PHARMA (word mark), registered on September 21, 2000;
- European Union trademark registration No. 006532857 for LEO PHARMA (word mark), registered on July 11, 2016; and
- Danish trademark registration No. VR 2000 04370 for LEO-PHARMA (word mark), registered on September 21, 2000.

The Complainant also operates its official website under the domain name <leo-pharma.com>.

The disputed domain name was registered on March 2, 2026. According to the Complaint, the disputed domain name directed to a pay-per-click advertisement website, where, inter alia, competing skincare treatments were advertised. It results from the evidence filed by the Complainant that, once clicking on certain links on the website, a malware warning appeared. At the date of the current Decision, the disputed domain name directs to an error page.

On March 12, 2026, the Complainant sent a cease and desist letter to the Respondent via the Registrar. According to the Complainant, no response was received.

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.

First, the Complainant contends that the disputed domain name is confusingly similar to the Complainant's LEO PHARMA trademark. The disputed domain name consists of misspellings of the LEO PHARMA and LEPO-PHARMA trademarks, which are clearly recognizable in the disputed domain name. As to the addition of the generic Top-Level Domain ("gTLD") ".com", the gTLD is merely instrumental to its use on the Internet and shall be disregarded under the first element confusing similarity test.

Second, the Complainant contends that the Respondent lacks rights or legitimate interests in the disputed domain name. No license or authorization of any kind has been given by the Complainant to the Respondent to register or use the LEO PHARMA/LEO-PHARMA trademark as a domain name or otherwise, and the Complainant has found no information indicating that the Respondent is trading under any company name corresponding to the disputed domain name. There is no conceivable legitimate interest for the Respondent to own a domain name that is a deliberate misspelling of the LEO PHARMA trademark and the <leo-pharma.com> domain name of the Complainant. The Respondent has not made any demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods or services. The Respondent uses the disputed domain name for directing to a pay-per-click website where, inter alia,

competing skincare treatments are advertised, thereby capitalizing on the reputation and goodwill of the Complainant's trademark to attract Internet users.

The Complainant finally contends that the Respondent registered and uses the disputed domain name in bad faith. Concerning the registration in bad faith, the Complainant contends that the Respondent registered the disputed domain name several decades after the Complainant's registration for the LEO PHARMA/LEO-PHARMA trademarks. Given the confusing similarity with the Complainant's <leo-pharma.com> domain name, and the widespread use and recognition of the LEO PHARMA trademark, the Respondent was fully aware of the Complainant's LEO PHARMA trademark at the time of registration. Concerning the use in bad faith, the website under the disputed domain name displays links which promote products competing with the Complainant's own products and is also used to distribute malware. As a result, it is likely that the Respondent has used the disputed domain name with the intention to attract Internet users to its website for a commercial gain or any other sort of benefit derived from the links included in the website associated with the disputed domain name.

B. Respondent

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

6. Discussion and Findings

Dealing with the Respondent's failure to file a response to the Complaint, paragraph 14(b) of the Rules provides that if a party, in the absence of exceptional circumstances, does not comply with a provision of, or requirement under these Rules, the panel shall be entitled to draw such inferences from this omission, as it considers appropriate.

Paragraph 4(a) of the Policy provides that the Complainant proves each of the following three elements in order to succeed in its Complaint:

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

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 LEO PHARMA/LEO-PHARMA trademarks are recognizable within the disputed domain name. The LEO-PHARMA trademark is reproduced in the disputed domain name with the mere omission of the letter "r" in "pharma", which is an obvious misspelling. The only differences between the LEO PHARMA trademark and the disputed domain name is the absence of the letter "r" in the disputed domain name and the addition of a hyphen between "leo" and "phama". A domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. [WIPO Overview 3.1](#), section 1.9. The addition of a hyphen does not impact this conclusion. Accordingly, the disputed domain name is confusingly similar to the LEO PHARMA/LEO-PHARMA trademarks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The gTLD (here “.com”), as a standard requirement of domain name registration, may be disregarded in the assessment of identity or confusing similarity.

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.

According to the Complaint, which has not been rebutted by the Respondent, the Respondent is not licensed by or affiliated with the Complainant in any way. There is no evidence that the Respondent would be commonly known under the disputed domain name, nor is there any evidence of use or demonstrable plans to use the disputed domain name for a bona fide offering of goods or services. There is no evidence of legitimate noncommercial or fair use of the disputed domain name, either.

On the contrary, the Panel notes that the disputed domain name reproduces the LEO PHARMA/LEO-PHARMA trademarks in their entirety with an obvious misspelling (the letter “r” in “pharma” is missing), which will go unnoticed by most Internet users. As a result, noting also the use of the disputed domain name the Panel finds such composition reflects the Respondent’s ultimate intent to confuse unsuspecting Internet users into believing that the disputed domain name is operated by the Complainant.

Considering further the content of the website operated under the disputed domain name and based on the available records, the Panel notes that the Respondent was using the disputed domain name for resolving to a website containing pay-per-click links, including a link referring to skin care treatments, id est similar products as those of the Complainant. The Respondent has sought to create a misleading impression of association with the Complainant.

The Panel further notes that the Complainant also filed evidence showing that an attempt to access the disputed domain name triggered a malware warning. Panels have held that the use of a domain name for illegal activity, here distributing malware, 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 notes that the disputed domain name consists of the Complainant's trademarks LEO PHARMA/LEO-PHARMA with an obvious misspelling, namely the deletion of the letter "r" in "pharma", which amounts to typosquatting. The LEO PHARMA and LEO-PHARMA trademarks predate the registration of the disputed domain name. The LEO PHARMA trademark is inter alia registered in the European Union, where the Respondent is located. A quick LEO PHARMA or LEO-PHARMA trademark search, or even a Google search, would have revealed to the Respondent the existence of the Complainant and its trademarks. As a result, the Panel finds that the Respondent was more likely than not aware of the Complainant's trademark at the time of the registration of the disputed domain name. [WIPO Overview 3.1](#) section 3.2.2.

Paragraph 4(b) of the Policy provides that a domain name is used in bad faith when, by using the domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the respondent's website or location or of a product or service on the respondent's website or location. In the present case, the Panel notes that the disputed domain name which reproduces the LEO PHARMA/LEO-PHARMA trademarks with a misspelling (deletion of the letter "r" in "pharma"), combined with the gTLD ".com" which is also used by the Complainant for its official website under the domain name <leo-pharma.com>, reinforces the finding that the Respondent was aware of and intended to target the Complainant.

The Panel concludes that the Respondent intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's trademark.

Furthermore, the failure of the Respondent to submit a response is further evidence of bad faith, given all the circumstances of the case. [WIPO Overview 3.1](#), section 3.2.1.

Panels have held that the use of a domain name for illegal activity, here claimed distribution of malware, 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 <leo-pharma.com> be transferred to the Complainant.

/Mireille Buydens/

Mireille Buydens

Sole Panelist

Date: July 13, 2026