

ADMINISTRATIVE PANEL DECISION

Kalliopé v. Bernard Germanier
Case No. D2026-2824

1. The Parties

The Complainant is Kalliopé, France, internally represented.

The Respondent is Bernard Germanier, Switzerland.

2. The Domain Name and Registrar

The disputed domain name <kalliope-laws.com> is registered with Network Solutions, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 29, 2026. On June 29, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 30, 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 (PERFECT PRIVACY, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 2, 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 July 2, 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 July 3, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 23, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 24, 2026.

The Center appointed Willem J. H. Leppink as the sole panelist in this matter on July 27, 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 following facts are undisputed.

The Complainant is a French law firm founded in 2007, with its head office in Paris, France. The Complainant is an independent firm providing legal advice and representation to companies, public entities, and private clients, on a national and an international level. It has a wide range of practice areas including business law, intellectual property law, public law, and urban planning law.

The Complainant is the owner of the French trademark registration KALLIOPE (wordmark) with registration number 4527768, registered on August 9, 2019, for services in classes 36 and 45.

The Complainant is also the owner of the domain name <kalliope-law.com>, registered on July 23, 2007, which resolves to its official website.

The disputed domain name was registered on June 10, 2026.

At the time of rendering this decision the disputed domain name resolves to a page mentioning that “the site that is under construction and coming soon”. Mail Exchange (“MX”) servers are activated in relation to the disputed domain name. The email address “[...]@kalliope-laws.com” associated with the disputed domain name was used to send fraudulent emails impersonating one of the founding partners of the Complainant, purporting to offer legal assistance to the Complainant’s clients.

The Complainant sent a formal notice to the Registrar on June 23, 2006, which remained unanswered.

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 has been used for sending fraudulent emails to the Complainant’s clients and offering legal assistance. In such email, the Respondent impersonated the identity of a partner at the firm of the Complainant, using his email signature (including the street address and official website address of the Complainant) and making a proposal on behalf of the Complainant.

The disputed domain name incorporates the Complainant’s trademark in its entirety.

The disputed domain name is a direct typosquatting imitation of the Complainant’s registered domain name <kalliope-law.com> which resolves to its official website, differing only by the addition of the letter “s” at the end of “law”. The addition of a single letter does not prevent a finding of confusing similarity. On the contrary, consumers will readily understand the disputed domain name to be directly related to the Complainant, as the letter “s” is positioned at the end of the domain name and is unlikely to be noticed by Internet users.

The Respondent has no rights or legitimate interests in the disputed domain name. The Complainant has not granted any license, nor any authorization to use its trademark, included as a domain name. The Respondent’s use of the disputed domain name does not qualify as bona fide offer of goods and services.

The disputed domain name was registered and is being used in bad faith. First, its trademark is a well-known trademark, as the Complainant is a renowned law firm in France, widely known among the public for its expertise and reputation in legal advice and counsel. Second, even though the disputed domain name

does not lead to an active website, the Respondent is using the disputed domain name to send fraudulent emails to the Complainant's clients. Such conduct clearly constitutes bad-faith use of the disputed domain name. Thirdly, the fact that the disputed domain name is configured with MX records, enabling the Respondent to create email addresses using the disputed domain name, gives rise to a significant risk of phishing attacks. This risk has materialized, as an email has been sent from the disputed domain name to one of the Complainant's clients. This demonstrates moreover that the Respondent has already taken active steps to exploit the MX records activation for fraudulent purposes. The meticulous reproduction of the Complainant's identity, far from being accidental, demonstrates a deliberate intent on the part of the Respondent to deceive the recipient into believing that the email genuinely originated from the Complainant.

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 entirety of the mark is reproduced within the disputed domain name, with the exception of the accent over the letter "é". 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, "laws" may bear on assessment of the second and third elements, the Panel finds the addition of such term 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.

Panels have held that the use of a domain name for illegal activity here, claimed phishing/identity theft, passing off, or other types of fraud, 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 refers to its considerations under section 6.B.

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 Respondent with the registration and use of the disputed domain name has intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark and has also engaged in a pattern of bad faith conduct.

Panels have held that the use of a domain name for illegal activity here, claimed phishing/identity theft, passing off, or other types of fraud, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds that the Respondent's registration and use of the disputed domain name constitutes bad faith within the meaning of paragraph 4(a)(iii) of the Policy.

The Panel finds the third element of the Policy has been established.

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 <kalliope-laws.com> be transferred to the Complainant.

/Willem J. H. Leppink/

Willem J. H. Leppink

Sole Panelist

Date: August 4, 2026