ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Compagnie Générale des Etablissements Michelin v. PAM Craig
Case No. D2026-3025

1. The Parties

The Complainant is Compagnie Générale des Etablissements Michelin, France, represented by Dreyfus & associés, France.

The Respondent is PAM Craig, United States of America (the "United States").

2. The Domain Name and Registrar

The disputed domain name <michelinz.com> is registered with Wild West Domains, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 9, 2026. On July 9, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 11, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 14, 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 15, 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 21, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 10, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 26, 2026.

The Center appointed Levan Nanobashvili as the sole panelist in this matter on August 31, 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 world-leading tire company present in 170 countries, employing over 124,000 people, and operating 117 manufacturing facilities and sales agencies across 26 countries. Beyond its core automotive business, the Complainant launched the MICHELIN Guide in 1920 to help motorists plan their trips, expanding in 1926 to award stars for fine dining establishments, and now rating over 30,000 establishments in more than 30 territories across three continents.

The Complainant owns numerous trademark registrations worldwide for MICHELIN, including the following:

1) International Trademark MICHELIN, registration No. 771031, registered on June 11, 2001, duly renewed, in International Classes 5, 7, 8, 9, 10, 11, 12, 16, 17, 18, 20, 21, 24, 25, 39, and 42, designating multiple jurisdictions;

2) International Trademark MICHELIN, registration No. 1713161, registered on June 13, 2022, in International Classes 6, 7, 9, 12, 16, 20, 35, 37, 39, 41, and 42, designating multiple jurisdictions; and

3) United States trademark MICHELIN, registration No. 4126565, registered on April 10, 2012, duly renewed, in International Classes 36, 37, and 39.

The Complainant holds various domain names incorporating the MICHELIN mark, including <michelin.com>.

The Respondent reportedly resides in the United States.

The disputed domain name was registered on May 5, 2026. At the time of filing the Complaint and as of the date of this Decision, the disputed domain name resolves to an inactive webpage.

The Complainant sent a cease-and-desist letter to the Respondent through the Registrar on May 20, 2026, followed by several reminders. The Respondent did not reply.

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:

(i) MICHELIN is the world's top-selling and the most recognized tire brand;

(ii) the disputed domain name incorporates the MICHELIN mark in its entirety, merely adding the letter "z". This is a clear case of typosquatting;

(iii) the disputed domain name is likely to cause consumer confusion by leading Internet users to believe that it is affiliated with, sponsored by, or endorsed by the Complainant;

(iv) the Complainant's registration and use of the MICHELIN mark significantly predates the registration of the disputed domain name;

(v) it is implausible that the Respondent was unaware of the Complainant and its marks when registering the disputed domain name;

(vi) a simple search for MICHELIN would have immediately revealed to the Respondent the existence of the Complainant and its marks. The Respondent's failure to make routine inquiries reinforces a finding of bad faith; and

(vii) the presence of active MX records indicates that the disputed domain name may be used for fraudulent or malicious email schemes, such as phishing the Complainant's clients and employees or harvesting sensitive financial and credit card information.

B. Respondent

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

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Complainant carries the burden of proving that:

(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 has been registered and is being used in bad faith.

The Respondent's default in the case at hand does not automatically result in a decision in favor of the Complainant. However, paragraph 5(f) of the Rules provides that if the Respondent does not submit a Response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the Complaint.

Further, according to paragraph 14(b) of the Rules, the Panel shall draw such inferences from the Respondent's failure to submit a Response as it considers appropriate.

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. 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, in the present case the letter "z", may bear on assessment of the second and third elements, the Panel finds the addition of this 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.

To the extent that the added letter "z" may be perceived as a typographical error, the Panel notes that a domain name which consists of a variation of a trademark (typically a common, obvious, or intentional misspelling, referred to as typosquatting) is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. This stems from the fact that the domain name contains sufficiently recognizable aspects of the relevant mark. WIPO Overview 3.1, section 1.9.

The addition of the generic Top-Level Domain ".com" is a standard registration requirement and, as such, is disregarded under the first element confusing similarity test. WIPO Overview 3.1, section 1.11.1.

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 Respondent provided no evidence that it has been commonly known by the disputed domain name, or has made a legitimate noncommercial use thereof. The Respondent has not rebutted the Complainant's contention that it has not authorized the Respondent to use the Complainant's mark, or that there is no relationship between them that could justify the Respondent's use of the Complainant's mark in the disputed domain name.

The evidence on file demonstrates that the disputed domain name is configured with MX records, allowing the Respondent to use the disputed domain name for email communication. The Panel finds that such use would fail to establish rights or legitimate interests, as any email sent from the disputed domain name may confuse Internet users as to the email's true source. See *LogMeIn, Inc. v. Privacy Service Provided by Withheld for Privacy ehf / Joe Lavery, Must Have Marketing, LLC*, WIPO Case No. D2021-2899 and *Facebook Inc. v. Jeremy Williams*, *3 Man Group*, WIPO Case No. D2019-1535.

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. WIPO Overview 3.1, section 3.2.1.

It is well-settled case law among the panels that the practice of typosquatting may in itself be evidence of bad faith registration of a domain name. See *Confederation Nationale Du Credit Mutuel - CNCM v. Jder Isow*, WIPO Case No. D2022-3817; *Redbox Automated Retail, LLC d/b/a Redbox v. Milen Radumilo*, WIPO Case No. D2019-1600; and *LinkedIn Corporation v. Daphne Reynolds*, WIPO Case No. D2015-1679. Since the Respondent failed to provide any evidence to counter this conclusion, the Panel finds that the disputed domain name was registered in bad faith.

Panels have found that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. WIPO Overview 3.1, section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant’s trademark, the composition of the disputed domain name, and the failure of the Respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Having reviewed the record, the Panel finds that, in all likelihood, the Respondent’s registration and non-use of the disputed domain name constitute bad faith under the Policy.

A significant number of panels have consistently found that the Complainant’s MICHELIN mark is widely known. See *Compagnie Générale Des Etablissements Michelin v. John Smith, Michelin guide*, WIPO Case No. D2026-0164: “Previous UDRP panels have consistently recognized the well-known character of the MICHELIN mark”; *Compagnie Generale des Etablissements Michelin v. Phil Howard, Kithcen 47*, WIPO Case No. D2025-3315: “the Complainant has clearly demonstrated that it has rights to its MICHELIN Trademark and that its trademark was well-known prior to registration of the disputed domain names”; *Compagnie Générale des Etablissements Michelin v. WhoisGuard, Inc., WhoisGuard Protected / Saad Zaeem, Caramel Tech Studios*, WIPO Case No. D2017-0234: “The word ‘Michelin’ […] is also, as the factual background above shows, a well-known trademark.”

Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos) to a well-known trademark, can by itself create a presumption of bad faith. WIPO Overview 3.1, section 3.1.4. Therefore, the Panel finds that, in all likelihood, the Respondent registered the disputed domain name because of its similarity to the Complainant’s mark.

Noting the near instantaneous and global reach of the Internet and search engines, and particularly in circumstances where the complainant’s mark is widely known (including in its sector) or highly specific and a respondent cannot credibly claim to have been unaware of the mark, panels have been prepared to infer that the respondent knew, or have found that the respondent should have known, that its registration would be identical or confusingly similar to a complainant’s mark. WIPO Overview 3.1, section 3.2.2. In the present case, the composition of the disputed domain name, with the mere addition of a single letter “z”, suggests that the Respondent was actually aware of, and intended to target the Complainant’s mark.

The Respondent failed to reply to the cease-and-desist letter and did not explain or justify the use of the Complainant’s mark in the disputed domain name. UDRP panels have consistently held that the failure to respond to a cease-and-desist letter may be a factor in establishing bad faith registration and use of a domain name. See *Carrefour v. Jan Everno, The Management Group II*, WIPO Case No. D2017-0586, *Remy Cointreau Luxembourg S.A. v. Deividas Samulionis, UAB “Sentosa”*, WIPO Case No. D2016-2232, and *Encyclopaedia Britannica, Inc. v. John Zuccarini and The Cupcake Patrol a/ka Country Walk a/k/a Cupcake Party*, WIPO Case No. D2000-0330.

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 <michelinz.com> be transferred to the Complainant.

/Levan Nanobashvili/
Levan Nanobashvili
Sole Panelist
Date: September 11, 2026