

## **ADMINISTRATIVE PANEL DECISION**

L'Oréal v. Estebana Hoffman

Case No. D2026-3042

### **1. The Parties**

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

The Respondent is Estebana Hoffman, United States of America ("United States").

### **2. The Domain Name and Registrar**

The disputed domain name <idolebylancome.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 July 10, 2026. On July 10, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same day, 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 (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 12, 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 22, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 11, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 17, 2026.

The Center appointed Angelica Lodigiani as the sole panelist in this matter on August 24, 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 group specialized in the field of cosmetics and beauty. It has a portfolio of 37 brands and has approximately 86,000 employees across 150 countries. Among the Complainant's brands is LANCÔME, which is widely used in connection with cosmetics and beauty products. Founded in 1935, Lancôme has become one of the world's leading luxury beauty brands. Lancôme has a longstanding and well-established presence in the United States, through its official website at "www.lancome-usa.com", where it offers luxury cosmetics, skincare products, makeup, fragrances, gifts, and promotional offers to United States customers. The website also presents the history and heritage of the Lancôme brand, highlighting more than 80 years of expertise in the luxury beauty sector, its official makeup artists and brand ambassadors, and its broader activities in the field. Further, the Complainant promotes its IDÔLE product line marketed under the LANCÔME brand.

The Complainant is the owner of a large portfolio of LANCÔME/LANCOME trademarks, registered in various jurisdictions worldwide, including the following:

- LANCÔME, United States registration No. 3022836, registered on December 6, 2005, for goods and services in classes 3, 35, and 44; and

- LANCOME, European Union registration No. 018617516, registered on June 3, 2022, for goods and services in classes 3, 9, 35, and 41.

Moreover, the Complainant is the owner of the following trademark:

- IDOLE, European Union registration No. 018091273, registered on November 27, 2002, for goods in class 3.

The Complainant is also the owner of the domain name <lancome.com>, registered on July 8, 1997, which it regularly uses to promote its activity.

The disputed domain name was registered on May 27, 2025, allegedly by an individual located in the United States. At the time of filing of the Complaint, the disputed domain name resolved to a website, featuring the wording "Lancôme Perfumes" and including a brief description of Lancôme's history and products. The website also displayed a partial image of a perfume bottle and contained the following copyright notice: "© 2025 Lancôme. All rights reserved", placed above the statement "Beauty is not in the bottle, but in the moment". At the time of this Decision, the use of the disputed domain name remains the same, and the website displays various buttons including "Limited Edition 2025" and "Reserve Your Bottle".

On May 27, 2026, the Complainant notified the Registrar of the disputed domain name and requested that it be blocked. As the website remained active, on June 5, 2026, the Complainant contacted the hosting provider and requested the takedown of the website. However, the Complainant was unable to obtain any result as its communications either remained unanswered or generated automatic replies that did not address its requests.

#### 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 is confusingly similar to the Complainant's IDÔLE and LANCÔME/LANCOME trademarks, as it incorporates both marks in their entirety. The dominant element of the disputed domain name is the term "lancome," which is identical to the Complainant's trademark and is therefore readily recognizable within the disputed domain name. Furthermore, the overall composition of the disputed domain name creates a strong likelihood of confusion,

as the expression “idolebylancome” directly evokes the Complainant’s IDÔLE product line marketed under the LANCÔME mark.

The Complainant further submits that the Respondent lacks rights or legitimate interests in the disputed domain name for the following reasons.

The Respondent is not affiliated with the Complainant, and has never been authorized by the Complainant to use the Complainant’s trademarks or to register any domain name incorporating them. Moreover, the Respondent does not appear to be commonly known by the disputed domain name.

The disputed domain name resolves to a website creating a false impression of affiliation with the Complainant, notably through references to LANCÔME perfumes, imagery and content relating to the Complainant’s universe, and wording likely to lead Internet users to believe that the website is official, sponsored or otherwise authorized by the Complainant. The Respondent does not disclose the absence of any relationship with the Complainant.

Accordingly, the Complainant maintains that the Respondent is using the disputed domain name to misleadingly divert Internet users by creating a likelihood of confusion with the Complainant and its trademarks and that such use cannot confer rights or legitimate interests in the disputed domain name on the Respondent.

Lastly, the Complainant contends that the disputed domain name was registered and is being used in bad faith.

As far as registration in bad faith is concerned, the Complainant submits that its LANCÔME trademark is well known internationally and significantly predates the registration of the disputed domain name. The disputed domain name entirely incorporates the Complainant’s trademark IDÔLE in association with the trademark LANCÔME through the expression “bylancome”, making it inconceivable that the Respondent was unaware of the Complainant’s marks at the time of registration. In addition, the website demonstrates an attempt to capitalize on the Complainant’s reputation, either by misleading consumers or by exploiting the goodwill associated with its trademarks.

With respect to use in bad faith, the Complainant further submits that, absent any license, authorization, or permission to use its well-known trademarks, no actual or contemplated bona fide use of the disputed domain name could reasonably be claimed. The composition of the disputed domain name strongly suggests that the associated website is an official page, campaign, or product-related website authorized by the Complainant. Moreover, the disputed domain name resolves to a website that creates a false impression of affiliation with the Complainant. The website refers to “Lancôme Perfumes” and uses wording such as “Where Parisian Craft Meets Modern Luxury”, thereby directly targeting the LANCÔME trademark and the Complainant’s perfume business. Through such conduct, the Respondent seeks to take unfair advantage of the reputation attached to the LANCÔME and IDÔLE marks. Internet users encountering the disputed domain name and the associated website are likely to assume that they are connected with the Complainant, promote genuine goods or services, or otherwise operate with the Complainant’s authorization. Where a domain name is confusingly similar to a complainant’s mark, a likelihood of confusion is presumed, and such confusion inevitably diverts Internet traffic from the Complainant’s website to that of the Respondent.

Accordingly, the Respondent has registered and used the disputed domain name with the intention of capitalizing on the Complainant’s reputation by creating initial confusion and misleading Internet users into believing that the Respondent’s website is official, endorsed, or otherwise connected with 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 the trademarks LANCÔME/LANCOME and IDÔLE for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the marks are recognizable within the disputed domain name, which incorporates them entirely within the expression "idolebylancome". Accordingly, the disputed domain name is confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms here, "by", 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.

Accordingly, 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 Complainant has no relationship with the Respondent and did not authorize the Respondent to make use of its LANCÔME/LANCOME and IDÔLE trademarks including within the disputed domain name. The Respondent is not a licensee or distributor of the Complainant and does not appear to have been commonly known by the disputed domain name.

The composition of the disputed domain name, consisting of the combination of two trademarks belonging to the Complainant linked by the term "by" is inherently misleading as it falsely suggests an affiliation with the Complainant, particularly noting that the Complainant promotes its IDÔLE product line marketed under the LANCÔME brand. In addition, the disputed domain name resolves to a website containing references to the "Lancôme Perfumes", and wording relating to the perfume types, master perfumers, bottle design and "A Parisian Legacy", all referring to and celebrating the world of Lancôme fragrances and perfumes. The website also includes a partial reproduction of Lancôme's IDÔLE eau de parfum bottle and the following copyright notice: "© 2025 Lancôme. All rights reserved". Furthermore, the website invites visitors to reserve a limited edition of the IDÔLE eau de parfum by clicking on a dedicated section.

Overall, the Panel finds that the website associated with the disputed domain name is highly deceptive. Internet users are led to believe that the website belongs to, or is endorsed or authorized by the Complainant and may inadvertently disclose personal information, such as their email address, in an attempt to reserve the purported 2025 limited edition of the Complainant's IDÔLE eau de parfum.

Panels have held that the use of a domain name for illegitimate activity here, claimed as applicable to this case, 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.

Accordingly, 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 Respondent registered a domain name combining the Complainant's LANCÔME/LANCOME and IDÔLE trademarks in the expression "idolebylancome". This composition clearly demonstrates the Respondent's awareness of the Complainant and its marks at the time of registration. The LANCÔME mark enjoys a significant reputation in the cosmetics industry due to its longstanding and extensive use. In addition, the Respondent is reportedly located in the United States, a jurisdiction in which the LANCÔME trademark is not only registered but also widely known and extensively used in connection with the Complainant's cosmetics and beauty business. This further supports the conclusion that the Respondent registered the disputed domain name with full knowledge of the Complainant, its business, and its trademark rights.

Moreover, the inclusion of the IDÔLE mark, which identifies one of the Complainant's iconic fragrances, further supports the conclusion that the Respondent deliberately targeted the Complainant and its trademarks when registering the disputed domain name. This conclusion is reinforced by the content of the website associated with the disputed domain name, which contains multiple references to the LANCÔME mark, the Complainant's business, and the IDÔLE product.

Accordingly, the Panel finds that the Respondent registered the disputed domain name with full knowledge of the Complainant's marks to take advantage of the reputation associated with the Complainant and its trademarks. The registration of a domain name incorporating two of the Complainant's trademarks in a misleading expression designed to confuse Internet users as to the true origin of the disputed domain name amounts to bad faith.

As noted above, the disputed domain name resolves to a website containing multiple references to the LANCÔME mark and to the perfumery sector in which the Complainant operates. The website also reproduces a partial image of the IDÔLE fragrance bottle and displays a copyright notice incorporating the LANCÔME mark. In addition, it invites Internet users to provide their email addresses in order to "Monogram your bottle or own the 2025 Collector's Edition". In these circumstances, the Panel finds that the Respondent is using the disputed domain name to attract Internet users to its website by exploiting the reputation of the Complainant's well-known LANCÔME trademark.

Panels have held that the use of a domain name for illegitimate activity here, claimed passing off, or other types of fraud 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.

In light of the foregoing, 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 <idolebylancome.com> be transferred to the Complainant.

*/Angelica Lodigiani/*

**Angelica Lodigiani**

Sole Panelist

Date: September 9, 2026