

ADMINISTRATIVE PANEL DECISION

L'Oréal v. Name Redacted

Case No. D2026-3736

1. The Parties

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

The Respondent is Name Redacted¹.

2. The Domain Name and Registrar

The disputed domain name <lorealhk.com> is registered with PDR Ltd. d/b/a PublicDomainRegistry.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 20, 2026. On August 21, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 24, 2026, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

The Center verified that 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").

¹ The Respondent appears to have used the name of the Chairman of the Board of Directors and former Chief Executive Officer of the Complainant when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted the Respondent's name from this decision. However, the Panel has attached as Annex 1 to this decision an instruction to the Registrar regarding transfer of the disputed domain name, which includes the name of the Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST 12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on September 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 23, 2026.

The Center appointed Martin Švorčík as the sole panelist in this matter on October 12, 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 company operating internationally in the beauty and cosmetics sector. The Complainant has 86,000 employees, and is present in 150 countries, including Hong Kong, China, where its subsidiary was established in 1983.

The Complainant owns trademark registrations for L'OREAL, including:

- International Trademark Registration No. 1532645 for L'OREAL, registered on April 29, 2020, in Classes 3 and 5;
- United States Trademark Registration No. 7302017 for L'ORÉAL, registered on February 13, 2024, in Classes 3, 9, 35, and 41; and
- Hong Kong, China, Trademark Registration No. 305264217 for L'OREAL, registered on May 5, 2020, in Classes 3 and 5.

The Complainant also operates, among others, the domain names <loreal.com> and <loreal.hk>.

The disputed domain name <lorealhk.com> was registered on July 19, 2026. The Respondent as identified in the registration data and its related email address are referring, according to the Complainant's evidence, to the name of the Chairman of the Board of Directors and former Chief Executive Officer of the Complainant.

At the time of the Complainant's submission of the Complaint, the disputed domain name did not resolve to an active website. The evidence provided by the Complainant also shows that the disputed domain name was configured with mail exchange servers.

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 its L'OREAL trademark because it incorporates the mark in its entirety, with the addition of the term "hk", commonly understood as referring to Hong Kong, China, which does not prevent a finding of confusing similarity;
- the Respondent has no rights or legitimate interests in the disputed domain name because the

Respondent is not affiliated with or authorized by the Complainant, has not been commonly known by the disputed domain name, and is not making any bona fide offering of goods or services or legitimate noncommercial or fair use of the disputed domain name; and

- the disputed domain name was registered and is being used in bad faith because the Respondent was aware of the Complainant and its L'OREAL trademark, registered the disputed domain name using the name of its Chairman and former Chief Executive Officer, and configured the disputed domain name with mail exchange servers. The Complainant further contends that the non-use of the disputed domain name does not prevent a finding of bad faith and that the circumstances create a risk of impersonation, phishing, or other fraudulent use.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy requires the Complainant to establish 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.

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 the term "hk" 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.

In particular, the record contains no evidence that the Complainant has authorized the Respondent to use its L'ORÉAL trademark or to register a domain name incorporating that trademark. There is also no evidence that the Respondent has been commonly known by the disputed domain name or has made any bona fide offering of goods or services or legitimate non-commercial or fair use of the disputed domain name.

The Respondent is identified as the Complainant's Chairman and former Chief Executive Officer, and the registration data also lists an email address incorporating the same name. The Complainant confirms that neither it nor that individual authorized the registration of the disputed domain name. These circumstances cannot give rise to any rights or legitimate interests in 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 the present case, the Complainant's trademark rights substantially predate the registration of the disputed domain name. The disputed domain name incorporates the Complainant's well-known L'OREAL trademark in its entirety together with the term "hk", commonly understood as referring to Hong Kong, China, where the Complainant operates through a local subsidiary. The Respondent is identified as the Complainant's Chairman and former Chief Executive Officer, and the registration data further lists an email address incorporating the same name. These circumstances demonstrate that the Respondent was aware of the Complainant and its L'OREAL trademark when registering the disputed domain name and deliberately targeted the Complainant.

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 reputation of the Complainant's L'OREAL trademark, the composition of the disputed domain name, the Respondent's use of the name of the Complainant's Chairman and former Chief Executive Officer in the registration data, the configuration of mail exchange servers for the disputed domain name, and the absence of any plausible good-faith use to which the disputed domain name may be put, 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.

Accordingly, 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 <lorealhk.com> be transferred to the Complainant.

/Martin Švorčík /

Martin Švorčík

Sole Panelist

Date: October 26, 2026