ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
BARON ROUGE v. Houari Mimoune
Case No. D2026-4419

1. The Parties

The Complainant is BARON ROUGE, France, represented by Coblence Avocats, France.

The Respondent is Houari Mimoune, France.

2. The Domain Name and Registrar

The disputed domain name <sch-tickets.com> is registered with Hostinger Operations, UAB (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 30, 2026. On October 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 2, 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 (Anonymous / The RDAP server redacted the value) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 5, 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 October 6, 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 October 6, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 26, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 27, 2026.

The Center appointed Elise Dufour as the sole panelist in this matter on October 29, 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 simplified joint-stock company whose activities include artist management and phonographic production. The Complainant states that it is the production company of the French rap artist Julien Schwarzer, known under the stage name "SCH", and that it holds the rights to exploit the artist's image.

The Complainant owns trademarks consisting of SCH, including the following:

- French Trademark SCH (word) registration No. 4492983, registered on February 8, 2019, in international classes 9, 16, 25, 35, and 41;

- French Trademark SCH (word) registration No. 5048261, registered on January 10, 2025, in international classes 9, 14, 16, 18, 21, 25, 35, 38, 41, and 45; and

- International Trademark SCH (word) registration No. 1831494, registered on September 17, 2024, in international classes 9, 14, 16, 18, 21, 25, 35, 38, 41, and 45, designating Canada, the European Union, and Switzerland.

The Complainant states that it has held the domain name <sch.live> since May 17, 2023. This domain name resolves to the official website of the artist SCH, which includes an official ticketing service for a concert at the Stade de France scheduled for April 24, 2027. This concert was publicly announced in the press on December 9, 2025.

The disputed domain name was registered on April 25, 2026. At the time of the filing of the Complaint, the disputed domain name did not resolve to an active website, the browser displaying an error message.

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 incorporates its SCH trademark in its entirety, that the addition of the term "tickets", which relates to the sale of tickets for the artist's concerts, does not prevent a finding of confusing similarity, and that the generic Top-Level-Domain ("gTLD") ".com" is to be disregarded. The Complainant refers to *BARON ROUGE v. Celia jdid*, WIPO Case No. D2026-0041, concerning the domain name <sch-billetterie.com>.

The Complainant further contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name, as the Respondent is not commonly known by the name "SCH", is not affiliated with the Complainant, and has not been authorized to use the Complainant's trademarks. It adds that the composition of the disputed domain name suggests sponsorship or endorsement by the trademark owner and that the absence of an active website does not amount to a bona fide offering of goods or services or to a legitimate noncommercial or fair use.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith. The Complainant states that the artist SCH enjoys significant media exposure and recognition, at least among French-speaking audiences, and that the first results of a Google search for "SCH" relate to the artist. It points out that the concert at the Stade de France was publicly announced on December 9, 2025, several months before the registration of the disputed domain name, and that the term "tickets" directly refers to the sale of tickets for that concert. The Complainant also refers to two prior decisions concerning domain names of similar construction, *BARON ROUGE v. Celia jdid,* WIPO Case No. D2026-0041, and *Baron Rouge v. Laom Mazo*, WIPO Case No. D2026- 3044, concerning the domain name <sch-concert.com>. It contends that the passive holding of the disputed domain name does not prevent a finding of bad faith.

The Complainant requests the transfer of the disputed domain name.

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. 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, a hyphen and the term "tickets") may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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 gTLD ".com" is typically disregarded under the first element. 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 Complainant states that it has not authorized the Respondent to register the disputed domain name or use the SCH trademark, and there is no evidence that the Respondent is affiliated with the Complainant. Furthermore, there is no evidence that the Respondent is commonly known by the disputed domain name.

Moreover, the disputed domain name combines the Complainant's SCH trademark with the term "tickets", which refers to the sale of admission to the artist's concerts, an activity carried out by the Complainant through its official website. Such composition carries a risk of implied affiliation with the Complainant. WIPO Overview 3.1, section 2.5.1.

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 disputed domain name was registered on April 25, 2026, several years after the registration of the Complainant's earliest SCH trademark, and several months after the public announcement, on December 9, 2025, of the artist's concert at the Stade de France scheduled for April 24, 2027, for which the Complainant operates an official ticketing service. The disputed domain name combines the SCH trademark with the term "tickets", which refers directly to that activity. The circumstances therefore indicate that, on the balance of probabilities, the Respondent knew of the Complainant and its SCH trademark when registering the disputed domain name and likely registered it with the intention to target the Complainant.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) 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 (i) the distinctiveness of the Complainant's SCH trademark and the reputation of the artist SCH, at least in France, as shown by the press coverage produced by the Complainant; (ii) the composition of the

disputed domain name, which combines the SCH trademark with the term “tickets”; and (iii) 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.

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 <sch-tickets.com> be transferred to the Complainant.

/Elise Dufour/
Elise Dufour
Sole Panelist
Date: November 12, 2026