

ADMINISTRATIVE PANEL DECISION

Mistral AI v. Sergi Escote, OPTIMA NETWORK, S.L.U.
Case No. DAI2025-0060

1. The Parties

The Complainant is Mistral AI, France, represented by Blanche Avocats, France.

The Respondent is Sergi Escote, OPTIMA NETWORK, S.L.U., Spain.

2. The Domain Name and Registrar

The disputed domain name <mistrall.ai> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 10, 2025. On November 10, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 10, 2025, 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 by Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 11, 2025, 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 November 13, 2025.

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 November 14, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 4, 2025. The Response was filed with the Center on November 14, 2025.

The Center appointed Mihaela Maravela as the sole panelist in this matter on November 21, 2025. 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.

The Complainant sent a supplemental filing to the Center on November 26, 2025. On November 28, 2025, the Panel issued a Panel Order inviting the Respondent to make his comments or submission to the Complainant's Supplemental filing by December 3, 2025, and extending the due date for the Panel to render its decision accordingly. The Respondent sent an email communication with its submission to the Center on November 28, 2025.

4. Factual Background

According to information in the Complaint, the Complainant is a European leader in generative artificial intelligence, specializing in developing and offering large language models (LLMs) based on its models. The Complainant was founded in early 2023 by three researchers from the AI labs of Meta and Google DeepMind, and it enjoyed a quick and significant success: it raised 100 million euros and 385 million euros in two funding rounds in 2023 and 600 million euros in a third funding round in 2024. In 2025, the Complainant secured 1.7 billion euros in a fourth funding, marking a historic milestone as one of France's first decacorns (startup valued at over 10 billion euros), with a post-money valuation nearly reaching 12 billion euros.

The Complainant has provided evidence that it is the registered owner of various trademarks relating to its company name and brand MISTRAL AI, including, but not limited to the following:

- European Union trademark MISTRAL AI No. 018942618 filed on October 26, 2023, and registered on February 14, 2024, for services in class 42; and
- International trademark MISTRAL AI No. 1794809 filed and registered on December 15, 2023, for goods and services in classes 9, 35, and 42.

The Complainant is the owner of the domain name <mistral.ai> since May 15, 2019, which it uses for its official website and it is also the owner of other domain names, including the following: <mistralai.fr>, <mistralai.com>, <mistral-ai.fr>, <mistraldev.net>.

The Respondent appears to be an individual located in Spain. In his submission to the Procedural Order, he claims that he is in the business of online advertising and that he registered hundreds of brandable terms as domain names as part of his digital business activity.

The disputed domain name was registered on October 20, 2025, and it directs to a Sedo parking page, indicating that the disputed domain name may be for sale by its owner, with pay-per-click ("PPC") links also displayed in the page.

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 quasi-identical to its trademarks, company name and domain name, adding only a second "i" to mislead the public. The Complainant submits that this conduct clearly constitutes "typo-squatting", a well-known manifestation of cybersquatting.

As regards the second element, the Complainant argues that the Respondent does not own any MISTRAL AI, MISTRALL AI or similar trademarks and that the Complainant has never authorized the Respondent to register and use the disputed domain name, or to use its MISTRAL AI trademarks. Further, the Complainant argues that the Respondent intentionally chose the “.ai” country code Top-Level Domain (“ccTLD”), which relates to the Complainant’s well-known AI activities, in an attempt to take advantage of the Complainant’s trademark and reputation. Furthermore, the fact that the disputed domain name was already for sale only three days after its registration, confirms that the disputed domain name was not registered to be legitimately exploited, but for cybersquatting and other fraudulent purposes.

With respect to the third element, the Complainant argues that it has been enjoying a worldwide reputation since its creation in 2023, widely relayed by the media. Therefore, the recent registration of the disputed domain name is no coincidence: the Respondent knew about the Complainant and sought to take unfair advantage of the latter’s reputation.

In its supplemental submission, the Complainant contends with respect to confusing similarity that the Respondent’s argument actually reinforces the finding of bad faith: by admitting that the term “mistrall” is merely an invented or stylized term with no independent meaning, the Respondent provides no legitimate reason for selecting a name that differs from the Complainant’s trademark by only one doubled letter (similarity that is only reinforced by the “.ai” extension). Moreover, the Respondent does not justify any legitimate use, activity, or commercial project involving the disputed domain name which would be essential to demonstrate a legitimate interest. Registering domains for hypothetical future projects does not establish any rights or legitimate interests in the disputed domain name.

B. Respondent

The Respondent argues that he registered the disputed domain name lawfully, in good faith, and without any knowledge whatsoever of the Complainant, its alleged reputation, or its trademarks.

He argues that the disputed domain name includes a double “l”, forming a different and independently brandable word from the Complainant’s trademark MISTRAL. The Respondent contends that “mistrall” (with two “l”s) is a legitimate variant commonly used in invented brand names, fantasy-style naming, surnames, or as a stylized form of a dictionary word for uniqueness. Further, the Respondent submits that he is the CEO of a company, Optima Network, S.L.U., and he routinely registers domain names for potential future projects or branding opportunities.

Moreover, the Respondent claims that the disputed domain name displayed an automatic parking page, as it is standard with millions of newly registered domains, but he did not configure the parking page, list the disputed domain name for sale, approach the Complainant, or solicit any purchase. The Respondent claims that the Complainant has not demonstrated targeting, which is essential for establishing bad faith, as there is no active use, no misleading content on the disputed domain name that has never displayed content, services, or advertisements referencing the Complainant, AI models, or anything related to their business.

In his submission answering to the Complainant’s supplemental submission, the Respondent argues that under the UDRP there is nothing improper in registering an invented or brandable term with no pre-existing meaning, and the fact that “mistrall” (with two “l”s) is a coined or stylized term does not mean that it must be a deliberate typo of the Complainant’s mark. Furthermore, the Respondent argues that “mistrall” is a dictionary word used by many different businesses. The Complainant cannot reasonably claim a monopoly over every conceivable variation of that word combined with “.ai”, particularly where there is no evidence of any actual targeting. In addition, as regards the second element, the Respondent contends that he is in the business of an online advertising company and that he owns hundreds of domain names. Registering brandable terms in advance of concrete development plans is a normal and long-standing part of the Respondent’s digital business activity.

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (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 applicable standard of proof in UDRP cases is the “balance of probabilities” or “preponderance of the evidence”, and the Panel can draw certain inferences in light of the particular facts and circumstances of the case. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ([“WIPO Overview 3.0”](#)), section 4.2.

The Panel has taken note of the [WIPO Overview 3.0](#), and, where appropriate, will decide consistently with the consensus views stated therein.

A. Supplemental filings

The Complainant sent a supplemental filing to the Center on November 26, 2025, thereby commenting on the Response of November 14, 2025. Paragraphs 10 and 12 of the Rules grant the Panel sole discretion to determine the admissibility of unsolicited supplemental filings. While paragraph 10(d) of the Rules states that: “The Panel shall determine the admissibility, relevance, materiality and weight of the evidence”, paragraph 12 of the Rules provides that: “In addition to the complaint and the response, the Panel may request, in its sole discretion, further statements or documents from either of the Parties.” The principles which the Panel should apply in deciding whether or not to admit unsolicited supplemental filings have been considered in many cases under the Policy and have meanwhile been widely agreed among UDRP panels, in that such supplemental filings should be generally discouraged and only be excepted in “exceptional” circumstances (see [WIPO Overview 3.0](#), section 4.6). In the case at hand, the Panel is willing to accept such “exceptional” circumstances, given that the comments made by the Complainant in its supplemental submission were meant to answer to the Response, where arguments concerning rights or legitimate interest and bad faith were raised by the Respondent that could have not been anticipated by the Complainant. Thus, the Panel will accept the supplemental filings provided by both Parties, in order to treat both Parties equally and fair (paragraph 10 of the Rules) and to allow for a just and sound decision still in due time (paragraph 15(b) of the Rules).

B. Identical or Confusingly Similar

Under paragraph 4(a)(i) of the Policy, the Complainant must prove that it has rights to a trademark, and that the disputed domain name is identical or confusingly similar to that trademark. This first element under the Policy functions primarily as a standing requirement. [WIPO Overview 3.0](#), section 1.7.

The Complainant has shown rights in respect of the trademark MISTRAL AI for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

As regards the second limb of the first element, the test for confusing similarity involves a reasoned but relatively straightforward comparison between the trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

The Complainant submits that the disputed domain name fully reproduces the mark MISTRAL AI, and that it is similar to its earlier trademarks, company name and domain name, and that the Respondent deliberately reproduced the Complainant’s domain name, adding only a second “I”, which clearly constitutes “typo-squatting”. The Respondent disagrees and alleges that the disputed domain name includes a double “I”, forming a different and independently brandable word from the Complainant’s mark MISTRAL.

With the Complainant's rights in the MISTRAL AI trademark established, the Panel will consider when undertaking its analysis under the first element of the Policy whether the Top-Level Domain ("TLD") should be taken into account. According to the settled view of UDRP panels, [t]he applicable Top Level Domain ("TLD") in a domain name (e.g., ".com", ".club", ".nyc") is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test.

The practice of disregarding the TLD in determining identity or confusing similarity is typically applied irrespective of the particular TLD (including with regard to "new gTLDs"); the ordinary meaning ascribed to a particular TLD would not necessarily impact assessment of the first element. The meaning of such TLD may however be relevant to panel assessment of the second and third elements. See sections 1.11.1 and 1.11.2 of the [WIPO Overview 3.0](#).

However, "[w]here the applicable TLD and the second-level portion of the domain name in combination contain the relevant trademark, panels may consider the domain name in its entirety for purposes of assessing confusing similarity". See section 1.11.3 of [WIPO Overview 3.0](#).

The Panel considers appropriate to consider the TLD ".ai" in this case in affirming that the disputed domain name is confusingly similar to the trademark rights of the Complainant, as unlike most TLD identifiers, the TLD ".ai" can be seen to have a meaning beyond the two-letter code for Anguilla, namely it is globally used to designate Artificial Intelligence (AI), being popular for AI companies, startups, and tech ventures. Thus, the Panel agrees with the opinions expressed by prior UDRP panels that considered the TLD when analyzing the first element. See e.g., *project.me GmbH v. Alan Lin*, WIPO Case No. [DME2009-0008](#); *BookIt.com, Inc. v. PrivacyProtect.org / ICS INC.*, WIPO Case No. [D2013-0775](#); *Tesco Stores Limited v. M.F.*, WIPO Case No. [DCO2013-0017](#).

Whether the TLD is included or ignored in this analysis, the Panel finds that the mark MISTRAL AI is recognizable within the disputed domain name, which incorporates the obvious misspelling of the first word, "mistrall", of the Complainant's trademark, with the addition a second "l" at the end of the word. This misspelling in the disputed domain name also referred to as typosquatting, does not prevent a finding of confusing similarity (see [WIPO Overview 3.0](#), section 1.9). Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. The Respondent's arguments that this misspelled version creates a new "brandable" term are more appropriately considered under the second and third elements of the Policy.

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

C. 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 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 3.0](#), section 2.1.

Here, the Complainant has made a prima facie case by establishing its trademark rights, denying that the Respondent has authorization to use the Complainant's mark, noting that there is no evidence that the Respondent owns trademarks for "MISTRALL AI", or that the Respondent has been commonly known by the disputed domain name. The Complainant also provided evidence that the disputed domain name is parked with Sedo, and that the parked page mentions that the disputed domain name may be for sale by its owner and provides PPC links.

In the Panel's view, as explained below, the Respondent has not sufficiently rebutted the Complainant's prima facie showing and has not come forward with any evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise. Moreover, the Panel took into account that, unlike the Complainant, the Respondent's explanation was not submitted in the form of a certified statement as to the accuracy and completeness of his statements, as required under the Rules.

The Respondent does not hold trademark rights for "MISTRAL AI", or "MISTRALL AI", and is not known to carry on any commercial activity under a name corresponding to the disputed domain name. Rather, the Respondent contends that the term "mistrall" (with two "l"s) is a legitimate variant commonly used in invented brand names, fantasy-style naming, surnames, or as a stylized form of a dictionary word for uniqueness and that he owns hundreds of domains as part of his long-standing digital business activity. In his reply to the Complainant's supplemental submission, the Respondent also claims that "mistrall" is a dictionary word used by many different businesses.

The essence of the Respondent's case is that the disputed domain name represents an invented, "brandable" name registered as part of a portfolio of such domain names. Further to the Complainant's supplemental submission (where the Complainant inter alia argued that, by admitting that the term "mistrall" is an invented or stylized term with no independent meaning, the Respondent provides no legitimate reason for selecting a name that differs from the MISTRAL AI mark by only one letter), the Respondent further argued in his submission to the Procedural Order that "mistrall" is a dictionary word used by many different businesses.

While it is not entirely clear to the Panel what the Respondent means by "brandable", the Panel understands this reference as meaning that the Respondent registers domain names to be used as commercial brands; it is not clear whether the Panel is meant to infer that these terms are invented and do not correspond to an existing brand. See along the same lines, *SonarSource SA v. Hasan Kibar*, WIPO Case No. [D2025-3938](#). It further appears to the Panel that the Respondent's case is that a "brandable" term consists of a dictionary word, or at least this is a subsidiary argument to the "brandable" case. In either case, the registration of the disputed domain name would be legitimate if it does not breach existing trademark rights, respectively if it is used for its dictionary meaning. The problem for the Respondent here is that the existence of any dictionary meaning of the disputed domain name (or parts thereof), should have been proven by the Respondent, but the Respondent has not attempted to indicate what the dictionary meaning he relied upon was and a search by the Panel in online dictionaries does not show "mistrall" to be a dictionary entry (indeed, even in typing this word, it is auto-corrected to "mistrall").

On top of that, the Panel notes that a fundamental flaw in the Respondent's case is that it only considers the second level domain containing the term "mistrall" without the TLD ".ai". It is the entire disputed domain name, not just the term "mistrall" that must be considered when assessing the absence of rights or legitimate interests, for the reasons described in the previous section. The Panel agrees with prior UDRP panels that the combined term "mistrall.ai" has no ordinary meaning other than in connection with the Complainant. See *MISTRAL AI v. Yvenel Benoit*, WIPO Case No. [DME2025-0010](#). This trademark has become well-known for the services of the Complainant, who also holds a number of corresponding domain names. See e.g., *Mistrall AI v. robert batam*, *Mistrall AI*, WIPO Case No. [D2025-1802](#). The disputed domain name is a typosquatted version of this trademark. Moreover, while the Respondent asserts that he owns hundreds of domains as part of his long-standing digital business activity, and even if allowed the opportunity to respond to the Complainant's supplemental submission, the Respondent failed to present any examples of such domain names, particularly some relevant examples under the ccTLD .ai, that would have assisted the Panel in discerning a pattern of similar non-infringing registrations.

In any event, even if one would need to consider only the term "mistrall" and not "mistrall.ai", there is no evidence of any dictionary meaning of the term "mistrall" from the Respondent. According to Wikipedia, the term "mistrall" is "a strong, cold, northwesterly wind that blows from southern France into the Gulf of Lion in the northern Mediterranean".¹

¹ As stated in section 4.8 of WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision

Under these circumstances, and in particular, noting the choice for the TLD “.ai”, the value of the term “mistrall” in the disputed domain name appears to the Panel to plainly derive from the Complainant’s trademark and not from any dictionary meaning, which the Respondent has in any event failed to prove.

In all of these circumstances, the Panel rejects the Respondent’s assertion that the disputed domain name was legitimately selected as a “brandable” term or as a dictionary phrase which is independent of the Complainant’s trademark. On the available record, the Panel deems that that the disputed domain name was more likely than not selected as a typographical variant of the Complainant’s MISTRAL AI trademark, in which the Respondent cannot establish rights and legitimate interests within the meaning of the Policy.

Accordingly, the Panel finds the second element of the Policy has been established.

D. 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 3.0](#), section 3.2.1.

The Panel’s analysis of the question of registration and use in bad faith in this case essentially mirrors its analysis of rights and legitimate interests in section C above. For the reasons outlined above and further elaborated below, the Panel considers that the Respondent knew the Complainant’s trademark at the time of registering the disputed domain name. [WIPO Overview 3.0](#), section 3.2.2.

On the issue of registration, the Complainant’s trademark MISTRAL AI is distinctive and well-known. See *MISTRAL AI v. Yvenel Benoit*, supra. The Complainant has produced voluminous evidence showing recognition and renown of its trademark both locally and internationally and the Respondent did not contest such evidence. The disputed domain name is a typosquatted version of the Complainant’s well-known trademark. Under such circumstances, and given the lack of any evidence or compelling arguments from the Respondent on why he had chosen the disputed domain name, the Panel finds that the Respondent has registered the disputed domain name to target the Complainant and its trademark. Moreover, in this case the Panel finds that use of the TLD “.ai” which is part of the Complainant’s distinctive and well-known trademark proves targeting. The Panel also notes that the Complainant’s name and trademark MISTRAL AI appear in the top results on a Google search for the term “mistrall ai”, and even “mistrall ai”. Consequently, the Respondent would have become aware of the Complainant’s rights had he performed a basic Google search.

The Respondent claims to have registered the disputed domain inter alia for its value as a stylized form of a dictionary word for uniqueness; the Panel notes here that “mistrall” is not a dictionary word. The Respondent did not explain why it had chosen the TLD “.ai” which is part of the Complainant’s trademark (and suggestive of its activity and services). Moreover, the Complainant’s trademark is well-known in the AI field (See e.g., *MISTRAL AI v. Yvenel Benoit*, supra). In the absence of any evidence against the Complainant’s evidence and claims, this Panel accepts the Complainant’s evidence and finds that the Respondent has registered and used the disputed domain name, without the Complainant’s consent or authorization, for the purpose of capitalizing on the reputation of the Complainant’s trademark to target the Complainant’s rights. [WIPO Overview 3.0](#), section, 3.5.

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 <mistrall.ai> be transferred to the Complainant.

/Mihaela Maravela/

Mihaela Maravela

Sole Panelist

Date: December 10, 2025