

## **ADMINISTRATIVE PANEL DECISION**

Compagnie Générale des Etablissements Michelin v. Nguyen Hong Xuan Quy

Case No. D2022-1018

### **1. The Parties**

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

The Respondent is Nguyen Hong Xuan Quy, Viet Nam.

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

The disputed domain name <reviewmichelin.com> is registered with Mat Bao Corporation (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 24, 2022. On March 24, 2022, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 25, 2022, 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.

On March 29, 2022, the Center transmitted an email in English and Vietnamese to the Parties regarding the language of the proceeding. The Complainant confirmed its request that English be the language of the proceeding on March 29, 2022. On March 30, 2022, the Respondent indicated that it had no objection to the Complainant’s request for English to be the language of proceedings.

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”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on April 6, 2022. In accordance with the Rules, paragraph 5, the due date for Response was April 26, 2022. The Center received email communications from the Respondent on March 29, and April 6, 15, and 21, and June 1 and 30, 2022. The Response due date was

extended to April 30, 2022, on the Respondent's request. The Response was filed with the Center on April 30, 2022.

On May 3, 2022, the proceedings were suspended on the Complainant's request and on June 2, 2022, the suspension was similarly extended.

On June 30, 2022, the Complainant submitted an unsolicited supplemental filing. On July 7, 2022, the proceedings were reinstated on the Complainant's request.

The Center appointed Steven A. Maier as the sole panelist in this matter on July 21, 2022. 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.

On August 2, 2022, the Panel issued Procedural Order No.1 affording the Respondent seven days to file a reply to the Complainant's supplemental filing. The Respondent submitted a supplemental filing accordingly on August 7, 2022.

#### **4. The Parties' Supplemental Filings**

The Complainant's unsolicited supplemental filing addresses broadly two matters. The first of these comprises submissions that the Complainant is active in the field of hotel and restaurant guides, which contain "reviews", and that the disputed domain name is confusing for that reason among others. However, these are submissions that could and should have been made in the original Complaint and there is no justification for them being advanced subsequently in a supplemental filing. The Panel therefore disregards these submissions in their entirety.

The second matter addressed in the Complainant's unsolicited supplemental filing concerns the use made by the Respondent of the disputed domain name after the filing of the Complaint. The Complainant submits in particular that, while the disputed domain name was passively held at the date of the Complaint, it was used shortly afterwards for the purpose of a website apparently providing reviews of the Complainant's products and services. Indeed, it is the Respondent's case that it is making legitimate noncommercial or fair use of the disputed domain name by operating the website in question. In those circumstances, the Panel considers it proper to take account of the Complainant's submissions in its unsolicited supplemental filing about the Respondent's website. The Respondent has provided its reply to the Complainant's unsolicited supplemental filing as indicated above.

#### **5. Factual Background**

The Complainant is a corporation headquartered in France. It is a supplier of tyres and of complementary goods and services.

The Complainant is the owner of numerous registrations for the trademark MICHELIN throughout the world. Those registrations include, for example, International trademark registration number 771031 for the word mark MICHELIN, registered on June 11, 2001, for goods and services in a wide range of international classes. The trademark designates numerous territories under the Madrid Protocol, including Viet Nam.

The disputed domain name was registered on February 18, 2022.

At the date of this Decision, the disputed domain name resolved to a website at "www.reviewmichelin.com". As the content of that website is highly material to this Decision, it is described in some detail below.

The website is headed with the letters “BRACP” in a stylized form. It is sub-headed: “Independent review for MICHELIN products and services”. It continues: “Disclaimer: This website is operated by Brand Review and Consumer Protection (BRACP) for non-profit purposes. We have no relationship or affiliation with the owner of MICHELIN brand.”

The website then includes what is stated to be a “List of user reviews.” It is common ground between the Parties that the first of these was contributed by the Respondent itself. The remaining contributions, in chronological order and dated between April 8, and August 1, 2022, are as follows:

“Timmy - Not so bad quality, but needs more improvements.”

“David Driver - Michelin is always my first choice for car.”

“Joshua - Michelin tires are often overrated, but not so good.”

“Dan2k - 4 stars for my favourite brand.”

“K Moore - Just ok, standard tyre products.”

“XTristanX - 2 stars from Belarus user.”

“Mr. André - Michelin tyres are absolutely great for my cars! Could not find another brand at the same level.”

“Schreiber.88 - An acceptable selection for my car. I have no bad experience.”

“Guangdong-purchaser - This brand is not so bad, but it is not my first choice for car tyre.”

“Denzel – Couldn’t expect more than Michelin tyre.”

“Farhan - Price is a bit high, but quality is acceptable.”

Each of the above contributions is accompanied by a rating of between two and five stars.

The website contains a section titled “About Us”, which states: “This website is built and operated by Brand Review and Consumer Protection (BRACP) Limited Company, a company located in Hanoi, Vietnam. Our purpose is to make an online location, where the consumers are free to share their experiences and opinions about brand.”

The website also includes what appear to be contact details, including a street address, “Enterprise Code”, the name of a “Legal Representative” and a contact email for “Brand Review and Consumer Protection Limited Company (BRACP)”.

## **6. Parties’ Contentions**

### **A. Complainant**

The Complainant submits that it is the world’s leading tyre company. It states that it has 117 production sites in 26 countries and employs 124,000 individuals worldwide. The Complainant submits that it has been known for consistent innovation since 1889 and has advanced human progress by way of its products and services that increase travel efficiency. It states that MICHELIN is the top-selling tyre brand worldwide and that it was ranked No. 1 by Forbes as “best large employer in America”. It claims a further 88 awards from JD Power for “initial quality”.

The Complainant submits that its MICHELIN trademark has gained the status of a well-known or famous trademark. It refers in this regard to previous decisions under the UDRP, including *Compagnie Générale des Etablissements Michelin v. Transure Enterprise Ltd, Host Master / Above.com Domain Privacy*, WIPO Case No. [D2012-0045](#), in which the panel stated: “Based on the evidence adduced by the Complainant as noted above, this Panel has no hesitation in finding that the Complainant’s MICHELIN and MICHELIN GUIDE marks are famous and well-known trademarks in which the Complainant has rights.”

The Complainant submits that the disputed domain name is confusingly similar to its MICHELIN trademark. It contends that the disputed domain name substantially reproduces that trademark, which in the case of a well-known or famous mark is sufficient of itself to establish confusing similarity. The Complainant submits that the addition of the term “review” to its trademark does not prevent any likelihood of confusion and is

liable to confuse Internet users into believing it is related to the Complainant's genuine products and services.

The Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It states that it is not affiliated with the Respondent and has not authorized it to use its MICHELIN trademark, that the Respondent has no prior rights in the disputed domain name and has not been commonly known by it, and that the Respondent is making neither *bona fide* commercial use nor legitimate noncommercial or fair use of the disputed domain name.

The Complainant reiterates that no use was being made of the disputed domain name at the date of the Complaint. It states that a Facebook page was, however, created on that date, namely March 29, 2022, and that the Respondent's website was launched on or before April 4, 2022. It is the Complainant's case that the Respondent's website was hastily configured and that it is a "fake site" set up by the Respondent for the sole purpose of defeating this administrative proceeding.

The Complainant points to the following matters in support of its contention that the Respondent's website is fake. First, it says that the first review to appear on that website was placed by the Respondent itself, on March 31, 2022, only two days after the date of the Complaint. Secondly, it states that while the Respondent appears to operate as a registered business, "Brand Review and Consumer Protection BRACP Company Limited", the terms and conditions for its website stated, under "Acceptable Use Policy" referred to an unrelated third-party website and its "Privacy Policy" to another unrelated third party. The Complainant states that the "Privacy Policy" was subsequently removed and replaced with a "To be updated" message.

The Complainant disputes that the Respondent is making legitimate noncommercial or fair use of the disputed domain name. It states that the Respondent's website has a commercial purpose, as it promotes the Respondent's activities and directs Internet users to its Facebook page. The Complainant further claims that, as a registered business entity, it must be the Respondent's intention to generate revenues: the Complainant submits that, if this were not the Respondent's intention, it would instead have formed a non-profit organization to defend the rights of consumers.

The Complainant submits that the disputed domain name was registered and has been used in bad faith. It repeats its allegation that the Respondent has hastily created a fake website linked to the disputed domain name with the sole purpose of defeating the present proceeding.

The Complainant submits that the "disclaimer" included on the Respondent's website cannot cure the Respondent's bad faith when all the circumstances of the case point to such bad faith. It adds that the existence of the disclaimer amounts to an admission by the Respondent that Internet users are likely to be confused by its actions.

The Complainant refers to the Respondent's submission of a Viet Nam legal opinion to the effect that its use of the disputed domain name does not infringe the Complainant's MICHELIN trademark (see below). The Complainant submits that the laws of Viet Nam are not applicable to the present proceeding and that this is in any event a dispute under the UDRP and not a claim of trademark infringement.

The Complainant notes that the Respondent operates as "BRACP" and that it claims to be "contributing to the protection of consumer rights as well as the freedom of speech" (see again below). The Complainant asks why, in these circumstances, there is no website configured for the domain <bracp.com> itself, on which any reviews of the Complainant's business could have been hosted. The Complainant suggests that this further supports the view that the Respondent's activities are pretextual.

The Complainant further contends that the Respondent's business registration for "BRACP" covers numerous activities that differ from "market research and public opinion polling" (see again the Respondent's submissions below). The Complainant submits that these activities include, for example, wholesale services for computers, goods auctions, and technology development.

The Complainant submits that the Respondent has registered 30 domain names with a similar format as the disputed domain name and submits that all of these correspond to well-known or famous trademarks throughout the world. The Complainant states that 16 of these domain names resolve to websites similar to the one configured on the disputed domain name and cites the following URLs:

“www.review-instragram.com”  
“www.reviewaccor.com”  
“www.reviewelectrolux.com”  
“www.reviewfacebook.com”  
“www.reviewheets.com”  
“www.reviewiqos.com”  
“www.reviewlego.com”  
“www.reviewmarlboro.com”  
“www.reviewphilipmorris.com”  
“www.reviewroche.com”  
“www.reviewsanofii.com”  
“www.reviewsodexo.com”  
“www.reviewsofitel.com”  
“www.reviewswarovski.com”  
“www.reviewvirgin.com”

The Complainant submits that the Respondent’s above activities demonstrate an intention on its part to target well known trademarks.

The Complainant requests the transfer of the disputed domain name.

## **B. Respondent**

The Respondent submits that it operates as “Brand Review and Consumer Protection BRACP Company Limited” and was granted a Viet Nam business licence on March 15, 2022. It exhibits a copy of that licence and states that its principal business is “market research and public opinion polls.” The Respondent states that the disputed domain name was registered by the named Respondent on its behalf.

The Respondent concedes that the disputed domain name is confusingly similar to the Complainant’s MICHELIN trademark for the purposes of the Policy. It states that the disputed domain name was not, however, registered in bad faith.

The Respondent disputes the Complainant’s allegations concerning its website. It points out that the Complaint was filed approximately one month after the registration of the disputed domain name, which was not a sufficient period for the Respondent to have built its website: it does not have a “magic wand”. On the other hand, its website was already in the course of development at the date of the Complaint and was in fact completed on March 31, 2022. The Respondent submits that the initially inactive use of the disputed domain name should therefore be disregarded.

The Respondent states that, at the date of the Complaint, it had already hired a website designer to create a website template for a number of similar “review” websites. It submits evidence of communications in this regard commencing on February 5, 2022. It states that, by the end of March 2022, it had completed a basic template for a site at “www.reviewlego.com”, although there were a number of issues still to be resolved. It states that, in response to learning of the present Complaint, it modified the template in order to launch a website linked to the disputed domain name on March 31, 2022.

The Respondent states that it was also in these circumstances that the website terms and conditions and privacy policy originally included references to unrelated third parties. It states that it does not know from where its website designer copied these terms, but they merely formed part of the original website template. The Respondent states that it removed the terms when its website was completed as they were not

appropriate for the website.

The Respondent denies in the circumstances that its website was created hastily or in a hurry. It states that, in view of the Complainant also having complained about the passive holding of the disputed domain name, it seems to be difficult to satisfy the Complainant.

The Respondent submits that it is making legitimate noncommercial use of the disputed domain name, without intent for commercial gain to misleadingly divert consumers or tarnish the MICHELIN trademark.

The Respondent submits that the format of the disputed domain name, with the term “review” before the trademark MICHELIN, tends to communicate a lack of affiliation between the disputed domain name and the Complainant’s mark. It states that it follows this formulation for its 30 “review” websites and that placing the term “review” before the trademark indicates that the trademarked business is the object of the review. The Respondent contends that, had it wished to impersonate the Complainant, then <michelinreview.com> would have been a more effective domain name than the disputed domain name.

The Respondent further submits that the “BRACP” logo displayed at the top of its website, together with the disclaimer included on the website, means that visitors could not be confused into believing that the Respondent’s website had any affiliation with the Complainant.

The Respondent states that its intention in using the disputed domain name is “to create an online location, where Internet users around the world can freely share their opinions, comments and ratings for the services under MICHELIN trademark.” The Respondent states that it does not sell any products or services on its website, does not profit even from advertising, and is making totally noncommercial use of the disputed domain name.

The Respondent states that, with the exception of the first review on its website which was placed by itself, “... other reviews are genuinely created by website visitors.” It adds that it has no intention to tarnish the Complainant’s trademark, and that there is a facility for the Complainant to request the deletion of content if it find any false information within the reviews.

The Respondent denies having registered or used the disputed domain name in bad faith. It relies in this regard on its claim to be making legitimate noncommercial use of the disputed domain name as described above.

The Respondent states that it has never sought to conceal its identity or to mislead Internet users about its relationship with the trademark owner. It submits that it has prominently displayed its identity and contact details on its website, along with an appropriate disclaimer. It adds that it has never used a “privacy” service.

The Respondent submits that it has registered only one domain name using the MICHELIN trademark and it cannot therefore be claimed either that it is preventing the Complainant from reflecting its trademark in a domain name or that it is seeking to “corner the market” in relevant domain names.

The Respondent exhibits a legal opinion dated April 28, 2022 from a Viet Nam intellectual property law firm, Newave, to the effect that the disputed domain name has not been used in a manner which infringes the Complainant’s MICHELIN trademark. The Respondent submits that, while it accepts that the law of Viet Nam is not directly applicable to this proceeding, its obtaining this opinion demonstrates that it is always very careful in its registration of domain names and always tries to ensure that they are *bona fide* and legitimate.

The Respondent states that “... we are also proud that by registering and using the disputed domain name in this way, we are contributing to the protection of consumer rights as well as the freedom of speech. We believe that consumers should have the right to raise their voices and share their reviews/opinions about brands, even if their reviews are positive or negative.” The Respondent adds that “[w]e establish the website simply to protect the right of consumer and freedom of speech, which is our goodwill and passion.”

The Respondent states that whether or not it could have included relevant reviews on its <bracp.com> domain name is irrelevant, as it is the disputed domain name that is in issue in this case. The Respondent states that its website clearly indicates its identity and that the website is a resource for independent reviews of the Complainant's products and services. The Respondent states that it does intend to build a website on the domain <bracp.com> in due course, but has a limited budget and also that: "we want to know the outcome of this dispute before moving forward."

The Respondent submits that its registration for a wide range of business activities is common in Viet Nam and does not affect its main sector of activity. It states that it did attempt to register a non-profit organization to defend the rights of consumers but found this very difficult to do under Viet Nam regulations.

Concerning its registration of 30 domain names combining the term "review" with third-party trademarks, the Respondent submits that there is no restriction under the UDRP on registering domain names consisting of trademarks for *bona fide* purposes just because the trademarks may be well known. It contends that it is because the trademarks are well known that the public will be interested in reviews about them. The Respondent reiterates that it has never tried to hide its identity in connection with these registrations. With regard to the specific examples of "review" websites cited by the Complainant, the Respondent states that it has been in correspondence with the relevant trademark owners concerning the domain names <reviewfacebook.com>, <review-instagram.com>, and <reviewsodexo.com>. It states that, in the first two instances, it explained its legitimate use to the trademark owner and no further action was taken. It states that in the third case, the trademark owner filed a complaint under the UDRP but the case was resolved "after some friendly discussions."

The Respondent submits that the Complainant has brought this proceeding in bad faith in an attempt at "reverse domain name hijacking". The Respondent states that, while it understands the Complainant's concern about its initial, passive, holding of the disputed domain name, the Complainant should have appreciated upon the launch of its website that the Respondent's activities were legitimate.

The Respondent adds that the Complainant has refused to enter into amicable discussions about the settlement of this proceeding, has forced it to incur legal costs and is abusing its trademark rights to hinder the Respondent's legitimate, noncommercial activities in supporting consumer rights and freedom of speech. The Respondent exhibits an email to the Complainant dated April 4, 2022 in which it sets out its case that it is operating a legitimate website in connection with consumer rights and freedom of speech. The email invites the Complainant to withdraw the present Complaint and concludes: "Should you need further discussion, please let us know soon. There is always room for discussion and negotiation to settle the dispute amicably, we believe."

## **7. Discussion and Findings**

In order to succeed in the Complaint, the Complainant is required to show that all three of the elements set out under paragraph 4(a) of the Policy are present. Those elements are that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (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**

The Complainant has established that it has registered trademark rights in respect of the mark MICHELIN.

The disputed domain name wholly incorporates that trademark, preceded by the term "review", which does

not prevent the trademark from being recognizable within, and therefore confusingly similar to the disputed domain name.

The Panel therefore finds that the disputed domain name is confusingly similar to a trademark in which the Complainant has rights and the first element is met.

## **B. Rights or Legitimate Interests**

The Panel finds the Respondent's MICHELIN trademark to be distinctive and widely known and that the nature of the disputed domain name creates a likelihood of association between the disputed domain name and the Complainant. The Panel does not consider it to be of material significance that the term "review" precedes the Complainant's trademark within the disputed domain name as opposed to following it, as the Respondent suggests.

Under paragraph 4(c)(iii) of the Policy, however, a registrant may succeed in demonstrating rights or legitimate interests in a domain name where it is "... making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue."

Such noncommercial or fair uses may in appropriate cases include "fan sites" or "criticism sites", as long as such sites are genuine in nature and have not been established as a pretext for targeting the relevant trademark for an ulterior purpose. So far as criticism sites are concerned, it is well established in jurisprudence under the UDRP that the Respondent's criticism in such cases must be genuine and noncommercial and not a "pretext for cybersquatting, commercial activity or tarnishment" (see section 2.6 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)")).

It is the task of the Panel in this case, therefore, to determine whether the Respondent's website associated with the disputed domain name is a genuine criticism or review site, as the Respondent submits, or alternatively a pretext for a bad-faith registration of a domain name which is intended to take unfair advantage of the Complainant's trademark.

While the Complainant makes much of the fact that the Respondent's website was hastily put together soon after the Complaint was filed, the Panel does not find this fact alone to be conclusive of bad-faith conduct on the Respondent's part. In this regard, the Panel is willing to accept the Respondent's explanation that it had prepared templates for this and similar websites, that the website was launched in response to the Complaint and that some of the website content, including the use of third-party material within the terms and conditions and privacy policy, was the result of the web designer's temporary actions.

What the Panel does not, however, accept is that the supposed reviews found on the Respondent's website are genuine. The reviews are very similar in style, comprising short, vague and highly generic statements about the MICHELIN brand, such as "Michelin is always my first choice for car" or "Price is a bit high, but quality is acceptable." None of the reviews appears to relate to any specific product or service provided by the Complainant, nor to any specific customer transaction, post-sale query, customer service experience or any other specific interaction with the Complainant which may have made a particularly good or bad impression on the relevant customer. In short, the Panel simply does not believe that any genuine customers would have bothered to interact with the Respondent's website in order to leave such anodyne and unspecific comments as appear – let alone that these would have appeared coincidentally just after the launching of the present proceeding.

The Panel also considers it relevant to this case to consider the content found on the Respondent's other "review" websites, which are referenced by both the Parties. These supposed reviews follow a very similar style and pattern as above, none of which appear to the Panel to constitute substantive and genuine reviews of the relevant trademark owner's goods or services. The reviews state, for example:



“Electrolux is still a big brand, but...”

“I buy a lot of Lego sets for my boy.”

“Products are ok.”

“I hate this brand so much. Poor quality product.”

“Not good but not so bad quality.”

The Panel concludes in the circumstances that the Respondent’s website linked to the disputed domain name does not represent a genuine criticism or review site which makes legitimate noncommercial or fair use of the disputed domain name. Having found that the relevant website is not a genuine criticism or review site, the Panel can only infer that the disputed domain name was in fact registered unfairly to target the goodwill attaching to the Complainant’s MICHELIN trademark, which cannot give rise to rights or legitimate interests in respect of the disputed domain name.

The Panel therefore finds that the second element is met.

### **C. Registered and Used in Bad Faith**

For the reasons set out above, the Panel has concluded that the reviews on the Respondent’s website linked to the disputed domain name are not genuine and that the website does not, therefore, represent a legitimate criticism or review site.

The Panel notes that, in its Response, the Respondent represents that, with the exception of the first review, “... other reviews are genuinely created by website visitors.” The Respondent also certifies in the Response that the information which it contains is complete and accurate to the best of its knowledge. The Panel having found the reviews not to be genuine, these matters fundamentally undermine the Respondent’s *bona fides* in connection with this matter.

Furthermore, the Respondent has not explained to the satisfaction of the Panel its motivation in creating the “BRACP” company and setting up its 30 “review” websites related to third-party trademarks, including the website linked to the disputed domain name. Plainly the Respondent has incurred expense in connection with the company registration, website development and (on its own submissions) in legal fees relating to the present proceeding. Yet the Respondent states that it intends to receive no revenues whatsoever in connection with the websites in question.

While it is not unusual for a criticism site to be created for noncommercial reasons, there is generally a comprehensible motivation for the creation of such a site: for example, the registrant may have had a bad experience with the trademark owner’s goods or services, or the registrant may have some specific social or political motivation for creating the site in question. Here, however, the Respondent has registered 30 domain names relating to third-party trademarks, none of them having any apparent connection with the Respondent or indeed with one another, save that, on the Respondent’s own case, they are well known trademarks.

In all the circumstances of the case, the Panel rejects as highly improbable the Respondent’s explanation that there was no commercial motivation for its actions and that: “[w]e establish the website simply to protect the right of consumer and freedom of speech, which is our goodwill and passion.”

While the Panel is unable to discern the Respondent’s precise motivation in registering the disputed domain name, the Panel considers it most likely that the registration of the disputed domain name and the operation of the related website represent part of a wider scheme devised by the Respondent in the hope of avoiding adverse findings under the UDRP and ultimately selling the domain names in question to the relevant trademark owners. The Panel notes in this regard the Respondent’s statement that it “want[s] to know the outcome of this dispute” before moving forward with its investment, and also – quite tellingly in the Panel’s view – its statement to the Complainant that “[t]here is always room for discussion and negotiation to settle the dispute amicably, we believe.”

The Panel finds in the circumstances that the disputed domain name has been registered and is being used in bad faith.

## **8. 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, <reviewmichelin.com>, be transferred to the Complainant.

*/Steven A. Maier/*

**Steven A. Maier**

Sole Panelist

Date: August 16, 2022