

## **ADMINISTRATIVE PANEL DECISION**

GIE AG2R v. Patricia Fleurette, Facturation Concept, Patricia Fleurette,  
Brain Trojan, Ampthink.com  
Case No. D2026-2545

### **1. The Parties**

The Complainant is GIE AG2R, France, represented by Scan Avocats AARPI, France.

The Respondents are Patricia Fleurette, United States of America ("Unites States"), Facturation Concept, United States, and Brain Trojan, Ampthink.com, United States.

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

The disputed domain names <ag2rlamondiale.fit>, <ag2rlamondiales.fit>, and <ag2rlarnondiale.fit> are registered with NameSilo, LLC (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 11, 2026. On June 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On June 12, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (REDACTED FOR PRIVACY (DT)) and contact information in the Complaint.

The Center sent an email communication to the Complainant on June 15, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all disputed domain names are under common control. The Complainant filed an amended Complaint on June 16, 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 June 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 13, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 14, 2026.

The Center appointed Pascal Böhner as the sole panelist in this matter on July 20, 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 Economic Interest Group registered under French law and operating under the brand AG2R LA MONDIALE. The Complainant is a leading social protection group in the insurance of persons and property in France, active in the fields of retirement, health insurance, life insurance, and savings management. The Group traces its origins to 1905, when the entity LA MONDIALE was founded.

As of 2025, the Complainant serves more than 12 million policy holders and protected beneficiaries, counts more than 383,000 corporate clients, employs more than 10,000 staff, and reported total revenues of EUR 13.1 billion for the financial year 2025. The Complainant also holds a notable public profile in the sports field through its sponsorship of the TRANSAT AG2R LA MONDIALE sailing race and its association with the French professional cycling team presently operating under the name Decathlon-CMA CGM.

The Complainant and its members hold numerous registered trademarks incorporating the designation AG2R LA MONDIALE, all predating the registration of the disputed domain names, including the following trademark registrations:

- French word trademark AG2R LA MONDIALE, registration No. 3629124, registered on February 12, 2009, covering services in classes 35, 36, 39, 41, 43, 44, and 45 (duly renewed);
- European Union semi-figurative trademark AG2R LA MONDIALE, registration No. 008261166, registered on March 1, 2010, covering services in classes 35, 36, 39, 41, 43, 44, and 45 (duly renewed); and
- French semi-figurative trademark AG2R LA MONDIALE le groupe des territoires, registration No. 4580597, registered on September 10, 2019, covering services in classes 35, 36, 41, and 45.

The Complainant further holds the domain names <ag2rlamondiale.fr> (registered February 27, 2007) and <ag2rlamondiale.com> (registered February 16, 2007), both predating the disputed domain names.

The disputed domain names were registered on May 8, 2026 (<ag2rlamondiale.fit>), May 19, 2026 (<ag2rlamondiales.fit>), and June 5, 2026 (<ag2rlarnondiale.fit>).

Prior to the filing of the Complaint, the disputed domain names resolved to parking pages provided by SKENZO LTD, displaying advertising hyperlinks. All three disputed domain names were configured with identical Mail Exchange ("MX") records (mx1.titan.email and mx2.titan.email).

Following successive DSA takedown notices submitted by the Complainant to the relevant hosting and email providers between May and June 2026, the websites associated with the disputed domain names were suspended. At the time of the commencement of the proceedings, none of the disputed domain names resolved to an active website, although MX records remained configured for at least two of them.

## 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 names.

Regarding the first element, the Complainant submits that the disputed domain name <ag2rlamondiale.fit> is identical to its registered trademark AG2R LA MONDIALE, reproducing the mark in its entirety with spaces omitted (as technically required in domain names) and the generic Top-Level Domain "gTLD" ".fit" appended. As to the disputed domain name <ag2rlamondiales.fit>, the Complainant submits that the addition of a final "s" constitutes a minor variation that does not prevent a finding of confusing similarity. As to the disputed domain name <ag2rlarnondiale.fit>, the Complainant argues that the substitution of the letter "m" in "mondiale" with the sequence "rn" (which is visually nearly indistinguishable from "m" in standard typefaces) constitutes a classic typosquatting technique that does not dispel confusing similarity with the Complainant's trademark.

Regarding the second element, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain names. The Respondent is not known by the name "AG2R LA MONDIALE", has not been authorized to use the Complainant's trademarks, and holds no trademark rights of its own. The use of the domain names for parking pages displaying Pay-Per-Click ("PPC") advertising links does not constitute a bona fide offering of goods or services, and the configuration of MX records raises serious concerns about potential phishing activities.

Regarding the third element, the Complainant contends that the disputed domain names were registered and are being used in bad faith. The trademark AG2R LA MONDIALE is well-known and distinctive in France; the expression has no common meaning in either French or English and could not have been chosen accidentally. The successive registrations, each made shortly after the Complainant's takedown of the preceding disputed domain name, demonstrate a deliberate pattern of bad faith conduct. Bad faith use is further evidenced by the prior resolution of the disputed domain names to parking pages and by the configuration of MX records, which creates the risk of phishing and impersonation campaigns targeting the Complainant's clients and employees. As regards the current inactive status of the disputed domain names following the Complainant's enforcement actions, the Complainant invokes the doctrine of passive holding.

### B. Respondent

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

## 6. Discussion and Findings

### Consolidation: Multiple Respondents

The amended Complaint was filed against nominally different registrants of the disputed domain names. The Complainant requests consolidation of the three disputes in a single proceeding pursuant to paragraph 10(e) of the Rules, arguing that the disputed domain names are under common control. The Respondent did not comment on the Complainant's request.

Paragraph 3(c) of the Rules provides that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder. Where a complaint is filed against multiple respondents, panels look at whether (i) the domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all parties. Procedural efficiency would also underpin panel consideration of such a consolidation scenario. [WIPO Overview 3.1](#), section 4.11.2.

Panels have considered a range of factors, typically present in some combination, as useful to determining whether such consolidation is appropriate, such as similarities in the registrants' identity, contact information (including email addresses, postal addresses, or phone numbers), relevant IP addresses, name servers or webhosts, the content or layout of websites corresponding to the disputed domain names, and naming patterns in the disputed domain names. WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.11.2.

In the present case, the Panel finds the following cumulative indicia compelling.

First, all three disputed domain names reproduce the Complainant's well-known trademark AG2R LA MONDIALE in its entirety under the same uncommon gTLD ".fit", with only minor variations. This consistent targeting of a single trademark owner across all three registrations supports the finding of a clear pattern.

Second, the three disputed domain names were registered in rapid succession: on May 7, 2026, on May 18, 2026, and on June 5, 2026. Each new registration appeared shortly after the Complainant's successful takedown of the preceding domain name. This timeline strongly suggests that a single actor resumed registration activity under a new nominal identity following each enforcement action.

Third, all three disputed domain names are registered with the same Registrar (NameSilo, LLC), are served by identical name servers and share the same IP address.

Fourth, prior to the Complainant's enforcement actions, all three disputed domain names resolved to similar parking pages provided by the same entity (SKENZO LTD) and were configured with identical MX records (mx1.titan.email and mx2.titan.email).

Fifth, while the registrant contact details provided for each of the three disputed domain names differ, all registrants are located in the United States and all use Gmail-based email addresses constructed after a similar pattern combining a name or entity designation with a number string. The Panel considers these contact details to be likely falsified, which is itself a further indicator of common control.

The cumulative weight of these factors is, in the Panel's view, sufficient to establish that the disputed domain names are under common control. This conclusion is consistent with the approach taken by panels in comparable circumstances. See, for example, *Byoma Limited v. da xiong, 陈晓 (Chen Xiao)*, WIPO Case No. [D2026-0336](#); *Ålandsbanken Abp v. Name Redacted*, WIPO Case No. [D2026-1413](#); and *Skyscanner Limited v. WHOIS Privacy Protection Service LLC and Drugs Dsa*, WIPO Case No. [D2026-1276](#), where panels found that a combination of shared technical infrastructure, registrar details, and registration patterns was sufficient to support a finding of common control.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any party. The Respondent did not object to the Complainant's consolidation request, and the evidence of common control is substantial. Procedural efficiency further supports a single proceeding.

Accordingly, the Panel decides to consolidate the disputes regarding the disputed domain names in a single proceeding.

The nominally different registrants will be referred to collectively below as the "Respondent".

### **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 3.1](#), section 1.7.

The Complainant has demonstrated rights in the registered trademark AG2R LA MONDIALE through multiple French and European Union trademark registrations, predating the disputed domain names.

The Complainant has shown rights in respect of a trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

As to <ag2rlamondiale.fit>: the disputed domain name reproduces the Complainant's trademark AG2R LA MONDIALE in its entirety. The gTLD ".fit" is a standard registration requirement and is disregarded under the first element test. [WIPO Overview 3.1](#), section 1.11.1.

As to <ag2rlamondiales.fit> : the disputed domain name also incorporates the Complainant's trademark AG2R LA MONDIALE in its entirety, appending only the letter "s". The trademark remains clearly recognizable within the disputed domain name. The Panel finds that the addition of the letter "s" constitutes an obvious or intentional misspelling of the trademark of the kind that UDRP panels consistently consider confusingly similar to the relevant mark. [WIPO Overview 3.1](#), section 1.9.

As to <ag2rlarnondiale.fit>: the disputed domain name incorporates the Complainant's trademark AG2R LA MONDIALE in its entirety, substituting the letter "m" in "mondiale" with the two-character sequence "rn", which is visually nearly indistinguishable from "m" in standard typefaces. This is a classic typosquatting technique. Panels have consistently held that domain names constituting typosquatting of this nature are, by definition, confusingly similar to the trademark being imitated. [WIPO Overview 3.1](#), section 1.9.

The Panel therefore finds the first element of the Policy has been established in respect of all three disputed domain names.

## **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 rests on the Complainant, panels have recognized that proving a respondent lacks rights or legitimate interests may result in the difficult task of "proving a negative", requiring information primarily within the knowledge or control of the respondent. Where the 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. If the Respondent fails to come forward with 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 that the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names. 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 names, whether by way of a bona fide offering of goods or services, being commonly known by the disputed domain names, or a legitimate noncommercial or fair use.

The Respondent is not commonly known by the name "AG2R LA MONDIALE", has not been licensed or authorized by the Complainant to use its trademarks or to register domain names incorporating them, holds no trademark rights in the denomination, and has no affiliation with the Complainant. Furthermore, within the circumstances of this case, the use of the disputed domain names to resolve to parking pages displaying PPC advertising links does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use. [WIPO Overview 3.1](#), section 2.9.

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 that, if found to be present, shall constitute evidence of registration and use of a domain name in bad faith.

The Complainant's trademark AG2R LA MONDIALE is a well-established and widely recognized mark in France, carrying over one hundred years of commercial history, a distinctive and arbitrary character with no common meaning in either French or English, and a national profile spanning insurance, pension management, and sports sponsorship. The Panel finds that the Respondent could not have been unaware of the Complainant's trademark at the time of registration of the disputed domain names in 2026. The registration of domain names that reproduce a well-known and distinctive trademark by an entity with no connection to the trademark owner gives rise to a presumption of bad faith registration. [WIPO Overview 3.1](#), section 3.1.4.

The Panel further notes that the disputed domain names were registered in immediate succession, each appearing shortly after the Complainant's enforcement action had led to the suspension of the preceding disputed domain name. This pattern of serial re-registration in the face of the Complainant's takedown efforts constitutes a pattern of bad faith conduct within the meaning of paragraph 4(b)(ii) of the Policy and reflects a deliberate strategy to maintain infringing registrations targeting the Complainant's trademark.

As regards bad faith use, the disputed domain names were used prior to the Complainant's intervention to display PPC parking pages, thereby commercially exploiting Internet users' association of the disputed domain names with the Complainant's trademark. Such use falls within the circumstances described in paragraph 4(b)(iv) of the Policy, as it intentionally attracted Internet users for commercial gain by creating a likelihood of confusion with the Complainant's mark. [WIPO Overview 3.1](#), section 3.5.

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 3.1](#), section 3.2.1. In the present case, the configuration of MX records on the disputed domain names (enabling the dispatch of emails from addresses appearing to originate from the Complainant), in the absence of any legitimate interest of the Respondent, creates a concrete risk of phishing and impersonation of the Complainant. This supports the finding of bad faith registration and use.

The current non-use of the disputed domain names does not by itself prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.1](#), section 3.3.

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 names <ag2rlamondiale.fit>, <g2rlamondiales.fit> and <ag2rlarnondiale.fit> be transferred to the Complainant.

*/Pascal Böhner/*

**Pascal Böhner**

Sole Panelist

Date: August 3, 2026