

## **ADMINISTRATIVE PANEL DECISION**

Ile-de-France Mobilités v. james bollin, We Navigo, navigation, John Fullwi, RADU SAAS, sdf sdf, and sdf sdf, sdf  
Case No. D2025-2008

### **1. The Parties**

The Complainant is Ile-de-France Mobilités, France, represented by De Gaulle Fleurance & Associés, France.

The Respondents are james bollin, United Kingdom, We Navigo, navigation, United States of America , John Fullwi, RADU SAAS, France, sdf sdf, France, and sdf sdf, sdf, France.

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

The disputed domain names <aide-fr-navigo.com> and <support-aide-navigo-fr.com> are registered with 1API GmbH.

The disputed domain name <navigo-aide-support.com> is registered with GMO Internet, Inc. d/b/a Discount-Domain.com and Onamae.com.

The disputed domain name <navigo-support.com> is registered with Squarespace Domains II LLC.

The disputed domain name <navigo-aide-support-fr.com> is registered with NameCheap, Inc.

The aforementioned registrars will collectively be referred to as the “Registrars”.

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 20, 2025. On May 21, 2025, the Center transmitted by email to the Registrars the request for registrar verification in connection with the disputed domain names. On May 21, 2025, May 22, and May 26, 2025, the Registrars transmitted by email to the Center their verification responses, disclosing registrant and contact information for the disputed domain names which differed from the named Respondents (Redacted for privacy, Navigation, Redacted for privacy, sdf, Redacted for privacy, Privacy service provided by Withheld for Privacy ehf, and c/o WHOISt trustee.com Limited) and contact information in the Complaint.

The Center sent an email communication to the Complainant on May 26, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints 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 domain names are under common control. The Complainant filed amended Complaints on June 2, and June 7, 2025.

The Center verified that the Complaint together with the amended Complaints 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 Respondents of the Complaint, and the proceedings commenced on June 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 30, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on July 1, 2025.

The Center appointed Iris Quadrio as the sole panelist in this matter on July 8, 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.

#### 4. Factual Background

The Complainant is Ile-de-France Mobilités (formerly known as Syndicat des Transports d’Île-de-France), a French public administrative establishment.

The Complainant is responsible for organizing and operating the public transportation system across Paris and the broader Île-de-France region. Its mission includes the planning, management, financing, and improvement of transportation and related services for passengers in the region. To fulfill these functions, the Complainant operates with an annual budget of approximately EUR 12 billion.

Among the Complainant’s most recognized services is the “Navigo” transportation pass, first introduced in 2001. This pass provides access to various public transport modes within the Île-de-France region, including metro, trains, trams, and buses. The Navigo pass encompasses several variants, including Navigo Liberté+, Navigo Annual Pass, Navigo Month Pass, Navigo Annual Senior Pass, Navigo Gratuité, Navigo Solidarité 75%, and Navigo Imagine R. As of 2022, more than 11 million Navigo cards had been issued, with millions of users relying on the card daily, both residents and non-residents.

The Complainant is the owner of the French trademark registrations for NAVIGO, Reg. No. 4266294, registered since August 26, 2016, in classes 9, 12, 16, 18, 35, 36, 37, 38, 39, 41, and 42; Reg. No. 3675722, registered since February 12, 2010 in class 12; and Reg. No. 3334053 registered since June 17, 2005, in classes 6, 7, 9, 16, 18, 25, 28, 35, 36, 37, 38, 39, 41, 42, 43, and 45.

The Complainant also claims to have online presence through the domain name <navigo.fr>.

Lastly, the disputed domain names were registered on the dates indicated below and are presently used as follows:

Disputed domain name	Registration date	Use
navigo-support.com	November 10, 2023	Inactive website
navigo-aide-support.com	November 12, 2024	Inactive website
aide-fr-navigo.com	November 26, 2024	Inactive website
support-aide-navigo-fr.com	November 25, 2024	Inactive website
navigo-aide-support-fr.com	November 25, 2024	Inactive website

The Complainant has also provided evidence showing that the domain name <navigo-aide-support.com> was used for sending a phishing email to a Complainant's customer inviting the recipient to log in for getting a refund of travel expenses.

## **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.

The Complainant states that the disputed domain names are confusingly similar to its trademark NAVIGO.

The Complainant further contends that the Respondents have no rights or legitimate interests in respect of the disputed domain names, nor are related in any way to the Complainant. Neither license nor authorization has been granted to the Respondents to make any use of the Complainant's trademark NAVIGO or apply for registration of the disputed domain names.

More specifically, the Complainant alleges that the Respondents have not used and/or have no demonstrable intention to use the disputed domain names except to create a likelihood of confusion with the Complainant's trademark. In fact, the Complainant claims that the Respondents are passively holding the disputed domain names and that the disputed domain name <navigo-aide-support.com> was used for phishing.

Finally, the Complainant has requested the Panel to issue a Decision ordering the transfer of the disputed domain names to the Complainant.

### **B. Respondent**

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

## **6. Discussion and Findings**

### **6.1. Consolidation: Multiple Respondents**

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the disputes against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.11.2.

As regards common control, the Panel notes that, as evidenced above: (i) all of the disputed domain names reproduce the Complainant's trademark NAVIGO in its entirety, in combination with the terms "aide" and/or "support" relating to assistance or customer support and the term "fr", a country code of France where the

Complainant is operating; (ii) the disputed domain names were registered or renewed within a relatively narrow time frame – between November 10, 2023 and November 25, 2024; (iii) all domain names share the same “.com” generic Top-Level Domain (“gTLD”); (iv) the composition of the domain names is highly similar, generally combining the Complainant’s trademark with support-related terms and/or geographical term, further reinforcing the impression of a common naming strategy devised to impersonate the Complainant’s official customer service; (v) the phone numbers associated with the four disputed domain names are French numbers (bearing the “+33” country code), lending further support to the inference that the domain names are under common control and were registered as part of a single scheme targeting the Complainant; and (vi) the disputed domain names <support-aide-navigo-fr.com> and <navigo-aide-support.com> are registered by the same registrant “sdf,sdf” with the registrant organization “sdf” added for the latter domain name.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants in a single proceeding. The Respondents are hereinafter referred to as the “Respondent”.

## **6.2. Substantive Matters**

According to paragraph 4(a) of the Policy, for this Complaint to succeed in relation to the disputed domain names, the Complainant must prove each of the following, namely that:

- (i) the disputed domain names are identical or confusingly similar with a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interest in respect of the disputed domain names; and
- (iii) the disputed domain names were registered and are being used in bad faith.

### **A. Identical or Confusingly Similar**

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant’s trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

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

The Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

While the addition of the terms (“aide” and/or “support” and/or “fr”) 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 names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

Moreover, the “.com” gTLD is viewed as a standard registration requirement and is generally disregarded under the first element of the confusing similarity test, as set forth in section 1.11.1 of [WIPO Overview 3.0](#).

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 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.

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 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 such as those enumerated in the Policy or otherwise.

The Complainant has claimed not to have authorized, licensed, or permitted the Respondent to register or use the disputed domain names or to use the trademark NAVIGO nor is there any other evidence in the file suggesting that the Respondent has or could have rights or legitimate interests in the disputed domain names. Also, the Complainant has prior rights in the NAVIGO trademark which clearly precede the Respondent’s registration of the disputed domain names.

Likewise, it does not seem that the Respondent is making any legitimate noncommercial or fair use of the disputed domain names. On the contrary, the Respondent is passively holding the disputed domain names, and the Complainant has provided evidence showing that the disputed domain name <navigo-aide-support.com> was used in furtherance of a phishing scheme.

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 such connection, the Complainant has submitted evidence to support that the trademark NAVIGO is widely known, at least in France, and was registered and used many years before the Respondent registered the disputed domain names. When registering the disputed domain names the Respondent has targeted the Complainant’s trademark NAVIGO to generate confusion among Internet users and benefit from Complainant’s reputation.

Therefore, the Panel is satisfied that the Respondent must have been aware of the Complainant and the Complainant’s trademark NAVIGO when it registered the disputed domain name. Consequently, and in accordance with section 3.1.4 of [WIPO Overview 3.0](#), the Panel considers that the inclusion of the Complainant’s NAVIGO trademark in the disputed domain names together with the terms “aide” and/or “support” and/or “fr” signals the Respondent’s intention of taking unfair advantage of the likelihood of confusion between the disputed domain names and the Complainant (and/or its customer support service) as to the origin or affiliation of the websites at the dispute domain names. This finding is further reinforced by the underlying use of the disputed domain name <navigo-aide-support.com> for a fraudulent email scheme

whereby the Respondent impersonates the Complainant, and the use of false or misleading contact details associated with the domain names registrations.

The disputed domain names currently resolve to inactive websites. Panels have found that the non-use of a domain name (including a blank or “coming soon” page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness or reputation of the Complainant’s trademark, and the composition of the disputed domain names, and finds that in this case the passive holding of the disputed domain names does not prevent a finding of bad faith under the Policy.

Moreover, the Complainant has provided evidence, as documented in Annex L, that the disputed domain name <navigo-aide-support.com> was used to create an email address from which a phishing email was sent. Panels have held that the use of a domain name for illegitimate activity, here, claimed as phishing, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain names constitutes 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 names <aide-fr-navigo.com>, <navigo-aide-support.com>, <navigo-aide-support-fr.com>, <navigo-support.com>, and <support-aide-navigo-fr.com> be transferred to the Complainant.

*/Iris Quadrio/*

**Iris Quadrio**

Sole Panelist

Date: July 22, 2025