

ADMINISTRATIVE PANEL DECISION

Automobile Club de l'Ouest (A.C.O.) v. Jian Sheng Ke
Case No. D2025-3475

1. The Parties

The Complainant is Automobile Club de l'Ouest (A.C.O.), France, represented by ARDAN, France.

The Respondent is Jian Sheng Ke, China.

2. The Domain Name and Registrar

The disputed domain name <24hourslemans.com> is registered with Copper Domain Names LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 27, 2025. On August 28, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 28, 2025, 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. The Center sent an email communication to the Complainant on August 29, 2025, providing the registrant and contact information disclosed by the Registrar, and informing the Complainant that Center will proceed with the formal commencement of the administrative proceeding by September 2, 2025.

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 September 2, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 22, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 29, 2025.

The Center appointed Emre Kerim Yardimci as the sole panelist in this matter on October 2, 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 the organizer of the “24h Le Mans” car race in the French department of Sarthe since 1923.

The “24h Le Mans” race has become one of the world’s leading endurance car races and one of the most prestigious races in the world. It is broadcasted over the world and receives extensive media coverage. In 2024, 1,400 journalists from 50 different countries were present to cover the race. In 2024, 329,000 spectators were attending the race.

The Complainant is the owner of 24 HEURES DU MANS and 24H LE MANS trademarks in various jurisdictions, among which the following:

- 24H LE MANS (figurative), European Union registration No. 018103617, registered on January 17, 2020, for goods in classes 9, 21 and 25;
- 24H LE MANS (figurative), European Union registration No. 012594677, registered on August 13, 2014, for goods and services in classes 4, 6, 9, 12, 14, 16, 18, 21, 24, 25, 26, 28, 33, 34, 35, 37, 38, 39, 41, 42 and 43; and
- 24H LE MANS (figurative), International registration No. 1235813, registered on August 4, 2014, for goods and services in classes 6, 9, 12, 14, 16, 18, 25, 28, 38 and 41, designating various jurisdictions worldwide.

The Complainant is the owner of the domain name <24h-lemans.com> registered in 2012, which resolves to its official website.

The disputed domain name was registered on April 21, 2025, two months before the yearly race scheduled always during the month of June for 100 years.

The disputed domain name resolved at the time of submitting the Complaint to a security blocked website displaying the message “Fortiguard Intrusion Prevention – Access Blocked. Webpage Blocked. You have tried to access a web page that is in violation of your Internet usage policy. Category Phishing”, and resolves, at the time of the decision, to a Chinese website containing references to football such as Fifa World Cup, LaLiga etc. and betting websites such as Bwin and Bet365.

5. Parties’ Contentions

A. Complainant

The Complainant asserts that the disputed domain name is confusingly similar to, and at the same time, incorporating the Complainant’s well-known trademarks 24H LE MANS as well as 24 HEURES DU MANS. The addition of the descriptive term “hours” instead of “H” which stands for “hours” only increases the risk of association between the disputed domain name and the Complainant’s trademarks.

The Complainant considers that the Respondent has no rights or legitimate interests in respect of the disputed domain name, mainly because the Complainant has neither licensed nor otherwise authorized the Respondent to use its marks or to apply for or use any domain name incorporating the trademarks 24H LE MANS as well as 24 HEURES DU MANS.

In addressing the question of registration and use of the disputed domain name in bad faith, the Complainant observes that the Respondent was well aware of the Complainant's trademark considering its trademark is so widely well-known that it is inconceivable that the Respondent was not aware the Complainant or its earlier rights.

Finally, the Complainant further submits that the disputed domain name is being used for phishing purposes which is determined by a third-party cybersecurity company suggesting that the Respondent has no intention to use the disputed domain name for legitimate purposes.

B. Respondent

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

6. Discussion and Findings

Pursuant to paragraph 4(a) of the Policy, the Complainant is required to prove the presence of each of the following three elements to obtain the remedy it has requested:

- (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

A. Identical or Confusingly Similar

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trademark and the disputed domain name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, (["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.

As indicated above, the Complainant holds trademark registrations for the trademarks 24H LE MANS and 24 HEURES DU MANS. The disputed domain name is almost identical to the Complainant's trademark 24H LE MANS, considering that the descriptive term "hours" refers to "H" within Complainant's trademark 24H LE MANS.

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

As regards the generic Top-Level Domain ("gTLD") ".com", it is typically disregarded under the confusing similarity test under the Policy.

Consequently, the Panel finds that the Complainant has shown that the disputed domain name is confusingly similar to a trademark in which the Complainant has rights.

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 name. The Respondent has not rebutted the Complainant’s prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

Panels have further held that the use of a domain name for illegal activity as explained hereunder the point C, claimed as phishing can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

In addition, the Panel considers that the composition of the disputed domain name carries a risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1.

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.

At the time of registration of the disputed domain name, the Complainant’s trademark 24H LE MANS was a very well-known trademark for very long time throughout the world. As the Complainant submits, it is inconceivable that the Respondent would not have known of the Complainant’s mark. This is reinforced by the composition of the disputed domain name which is almost identical to the 24H LE MANS trademark, the letter “H” referring to “hours”.

In the present case, the Panel notes that the Respondent has registered a disputed domain name almost identical to the Complainant’s trademark and has used the disputed domain for what a third party provider of Internet security services has identified as phishing. The Panel considers that the Respondent is more likely than not using the disputed domain name to mislead third parties.

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.

Panels have held that the use of a domain name for illegal activity here, claimed phishing constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

The Panel accepts the claim of the Complainant in that this disputed domain name is identified by a third. Party cyber security firm FortiGuard as being used for phishing purposes, a claim that is not opposed by the Respondent. (*Case Accor v. Sangho Heo / ContractPrivacy Inc.*, WIPO Case No. [D2014-1471](#) “the disputed domain name was registered and is being used in bad faith. The un-opposed allegation of phishing, and the evidence submitted in support of phishing, combined with the likelihood of confusion, is sufficient evidence of bad faith”).

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

Based on the evidence submitted with the Complaint, it is unequivocally clear that the Respondent was well aware of the Complainant's trademark and its activity. Considering all above facts, there is no doubt that the Respondent had the Complainant's trademark in mind when registering the disputed domain name and is using the disputed domain name in bad faith.

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 <24hourslemans.com> be transferred to the Complainant.

/Emre Kerim Yardimci/

Emre Kerim Yardimci

Sole Panelist

Date: October 16, 2025