

## **ADMINISTRATIVE PANEL DECISION**

JCDECAUX SE v. Peter Dela, jccdecaux.net  
Case No. D2025-3562

### **1. The Parties**

The Complainant is JCDECAUX SE, France, represented by Nameshield, France.

The Respondent is Peter Dela, jccdecaux.net, Australia.

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

The disputed domain name <jccdecaux.net> is registered with Squarespace Domains II LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 3, 2025. On September 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 4, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 9, 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 September 9, 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 September 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 2, 2025. The Respondent sent email communications to the Center on September 16, 2025, and September 20, 2025. The Center sent

notice to the Parties of the commencement of the panel appointment process on October 3, 2025. The Respondent sent a subsequent email on October 6, 2025.

The Center appointed Gonalo M. C. Da Cunha Ferreira as the sole panelist in this matter on October 7, 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, JCDECAUX SE, is a French multinational corporation founded in 1964 and headquartered in Neuilly-sur-Seine, France. It is the world's leading company in out-of-home (OOH) advertising, specializing in street furniture, transport advertising, and billboards. The Complainant operates in more than 80 countries, employs approximately 12,000 people, and generated revenues exceeding EUR 3.9 billion in 2024. The JCDECAUX brand is widely recognized globally for innovation in outdoor media and sustainable urban advertising solutions.

The Complainant owns numerous trademark registrations for the mark JCDECAUX, including:

- International Trademark Registration No. 803987, registered on November 27, 2001, designating multiple jurisdictions;
- European Union Trademark Registration No. 000765771, registered on June 11, 1999; and
- French Trademark Registration No. 99764274, registered on November 10, 1999.

The Complainant also owns and operates various domain names incorporating its mark, including <jcdecaux.com>, used as the main corporate portal of the group.

The disputed domain name <jccdecaux.net> was registered on September 2, 2025. According to the evidence provided by the Complainant, it resolves to a parking page with no active website content but includes active MX (mail exchange) records, indicating potential use for email communication.

#### **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 confusingly similar to the Complainant's JCDECAUX trademark.
- The disputed domain name reproduces the Complainant's mark in its entirety with the mere addition of an extra letter "c", which does not prevent confusing similarity and instead constitutes a classic case of typosquatting.
- The Respondent has no rights or legitimate interests in the disputed domain name.
- The Complainant has not authorized the Respondent to use its trademark or to register the disputed domain name.
- The Respondent is not commonly known by the disputed domain name and has made no bona fide use of it.
- The disputed domain name was registered and is being used in bad faith.

- The Respondent registered the disputed domain name with knowledge of the Complainant's well-known mark and likely with the intent to mislead Internet users for commercial gain or fraudulent purposes, particularly given the activation of MX records.

## **B. Respondent**

The Respondent did not formally reply to the Complainant's contentions, however in its emails stated that the disputed domain name is deleted.

## **6. Discussion and Findings**

Under paragraph 4(a) of the Policy, the Complainant must prove each of the following elements:

- (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 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 demonstrated rights in the JCDECAUX trademark. The generic Top-Level Domain ".net" is to be disregarded for the purpose of comparison.

The mark is recognizable within the disputed domain name. 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 disputed domain name incorporates the Complainant's mark in its entirety, with the addition of a single letter "c", a misspelling that does not prevent a finding of confusing similarity ([WIPO Overview 3.0](#), section 1.9).

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 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.

In similar circumstances, panels have found that the registration of a domain name comprising a typographical variation of a well-known trademark does not confer rights or legitimate interests (see *Sanofi v. Domain Privacy Guard Sociedad Anónima Ltd.*, WIPO Case No. [D2020-0956](#)).

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 the present case, the Panel notes that the disputed domain name reproduces the Complainant's well-known mark JCDECAUX in its entirety, with the mere addition of an extra letter "c". This composition represents a clear instance of typosquatting, a practice widely recognized as indicative of bad faith registration and use (see *ArcelorMittal S.A. v. VistaPrint Technologies Ltd.*, WIPO Case No. [D2017-0020](#); *Stellantis N.V. v. Carolina Rodrigues, Fundacion Comercio Electronico*, WIPO Case No. [D2024-1399](#)).

The disputed domain name currently resolves to an inactive parking page but maintains active MX records, suggesting potential use for deceptive or fraudulent email communications. Panels have consistently held that the passive holding of a domain name incorporating a well-known trademark does not prevent a finding of bad faith where other factors indicate abusive intent (see *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#); *Facebook Inc. v. Privacy Ltd. Disclosed Agent for YOLAPT*, WIPO Case No. [D2011-0912](#)). [WIPO Overview 3.0](#), section 3.3.

Considering the distinctiveness and reputation of the Complainant's trademark, the typographical variation in the disputed domain name, the absence of any plausible legitimate use, and the presence of active MX records, the Panel concludes that the disputed domain name was registered and is being used in bad faith under paragraph 4(a)(iii) of 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 name <jccdecaux.net> be transferred to the Complainant.

/Gonçalo M. C. Da Cunha Ferreira/

**Gonçalo M. C. Da Cunha Ferreira**

Sole Panelist

Date: October 13, 2025