

ADMINISTRATIVE PANEL DECISION

JCDecaux SE v. LIU HUA

Case No. D2025-3671

1. The Parties

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

The Respondent is LIU HUA, Mexico.

2. The Domain Names and Registrar

The disputed domain names <jcdecaux-br.cc> and <jcdecaux-br.com> are registered with Gname.com Pte. Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 10, 2025. On September 10, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On September 12, 2025, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 12, 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 12, 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 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 8, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 17, 2025.

The Center appointed Gustavo Patricio Giay as the sole panelist in this matter on October 27, 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 SA, is a leading global outdoor advertising group founded in 1964 in France and currently present in more than 80 countries. The Complainant offers innovative outdoor advertising solutions across three principal segments — street furniture, transport advertising and billboard advertising — and manages over 1,091,811 advertising panels worldwide. In 2024 the Group achieved consolidated revenue of EUR 3,935.3 million, with a digital-revenue growth rate of 21.9% and digital activity representing 39% of total revenue, thereby underscoring its leading role and ongoing evolution in the global out-of-home advertising market.

Moreover, the Complainant is the owner of the trademark JCDECAUX in many jurisdictions, including Mexican Institute of Industrial Property (IMPI) Reg. No. 1201464, registered since February 15, 2011, in classes 35; and International Reg. No. 803987, registered since November 27, 2001, in classes 6, 9, 11, 19, 20, 35, 37, 38, 39, 41 and 42.

The Complainant has Internet presence and holds the domain name <jcdecaux.com>, registered since June 23, 1997.

The disputed domain name <jcdecaux-br.cc> was registered on September 4, 2025. According to the Complainant's submissions, when attempting to access the disputed domain name, the browser displays a standard error message stating that the site is inaccessible, together with generic troubleshooting options such as checking the Internet connection or browser configuration. The disputed domain name does not display any content, nor does it offer any products, services, or interactive features.

The disputed domain name <jcdecaux-br.com> was also registered on September 4, 2025. According to the Complainant's submissions, the disputed domain name previously displayed a login-type interface showing the Complainant's name and inviting users to enter personal data, including a phone number and password, with options to sign in as "Android", "Apple", or as a corporate user. When recently attempting to access the site, the domain no longer displays such page. Instead, the browser shows a red security warning indicating that the site is unsafe and may attempt to deceive visitors into providing sensitive information. When expanding the "details" section of the warning, the browser states that phishing activity has recently been detected on this site. The warning further advises users not to proceed and to return to a secure page.

Lastly, the Respondent is identified as Mr. Liu Hua, located in Mexico. No evidence has been submitted by the Respondent to demonstrate any business activities, trademark rights or legitimate interest in the disputed domain names.

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.

Notably, the Complainant states that the disputed domain names <jcdecaux-br.cc> and <jcdecaux-br.com> are confusingly similar to its trademark JCDECAUX on which the Complainant has prior rights.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain names. The Complainant is not related to the Respondent in any way and has not authorized or licensed the Respondent to use its JCDECAUX trademark.

Moreover, the Complainant sustains that the disputed domain names were registered and are being used in bad faith. One of them resolves to an inactive page, while the other one used to resolve to login-type interface, and currently resolves to a browser warning indicating recent phishing activity. According to the Complainant, these circumstances demonstrate that the Respondent intentionally sought to exploit the reputation of the JCDECAUX trademark.

Finally, the Complainant requests that the Administrative Panel appointed in this administrative proceeding order that the disputed domain names be transferred to the Complainant.

B. Respondent

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

6. Discussion and Findings

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 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.

The entirety of the Complainant's mark is reproduced in the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the Complainant's trademark for the purposes of the Policy, consistent with [WIPO Overview 3.0](#), section 1.7.

Disregarding the Top-Level Domain ".cc" and ".com", in accordance with section 1.11.1 of the [WIPO Overview 3.0](#), the only difference between the Complainant's registered trademark and the disputed domain names is the addition of the geographic abbreviation "br". It is well established in prior UDRP decisions that the mere addition of a descriptive or non-distinctive term to a complainant's mark does not avoid a finding of confusing similarity. Although the addition of other terms (here, the geographic term "-br") may bear on assessment of the second and third elements, the Panel finds the addition of such term 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.

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 that 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 otherwise permitted the Respondent to register or use the disputed domain names or to use the JCDECAUX trademark in any manner. There is no evidence in the record suggesting that the Respondent has, or could have, any rights or legitimate interests in the disputed domain names. Moreover, the Complainant holds prior rights in the JCDECAUX trademark, which has been registered and used for many years before the Respondent registered the disputed domain names.

In addition, the Respondent is not identified in the Whois records as the disputed domain names, but as “LIU HUA”, which reinforces that the Respondent is not commonly known by the disputed domain names. Consistent with prior UDRP decisions, panels have held that a respondent cannot be considered “commonly known” by a domain name when the Whois information does not correspond to it.

Likewise, it does not appear that the Respondent has made nor is making any legitimate noncommercial or fair use of the disputed domain names. In particular, the disputed domain name <jcdecaux-br.cc> resolves to an inactive webpage displaying only a browser error message, without any content, offering of goods or services, or indication of a bona fide purpose. Regarding <jcdecaux-br.com>, the disputed domain name initially resolved to a webpage reproducing the Complainant’s trademark and requesting users to enter login credentials, thereby suggesting an intention to collect personal information. The site now triggers a Google Safe Browsing warning indicating that phishing activity has recently been detected on the webpage. Such behavior confirms that the Respondent has not made any legitimate use of the disputed domain names, nor taken any steps toward a bona fide offering of goods or services.

The Panel considers that the composition of the disputed domain name carries a risk of implied affiliation, in the present case, the inclusion of the geographic abbreviation “br”, commonly associated with Brazil, does not confer any distinctiveness to the disputed domain names. On the contrary, it increases the likelihood of confusion, as it may lead Internet users to believe that the disputed domain names refer to or is associated with the Complainant’s Brazilian operations, including its official Brazilian domain name <jcdecaux.com.br>. [WIPO Overview 3.0](#), section 2.5.1.

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 the domain names in bad faith.

In such connection, the Complainant has submitted evidence showing that the JCDECAUX trademark is widely known internationally and has been registered and used for many years prior to the Respondent's registration of the disputed domain names. By registering the disputed domain names, the Respondent has intentionally targeted the Complainant's well-known trademark with the aim of creating confusion among Internet users and taking advantage of the Complainant's reputation, particularly by suggesting an association with the Complainant's Brazilian operations.

Therefore, the Panel is satisfied that the Respondent must have been aware of the Complainant and of the Complainant's JCDECAUX trademark when registering the disputed domain names. Consequently, and in accordance with section 3.1.4 of the [WIPO Overview 3.0](#), the Panel considers that the inclusion of the Complainant's trademark in the disputed domain names gives rise to a presumption that the disputed domain names were registered in bad faith.

Furthermore, the disputed domain name <jcdecaux-br.cc> resolves to an inactive site. Panels have consistently held 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. See [WIPO Overview 3.0](#), section 3.3. Having reviewed the record, the Panel notes the distinctiveness and international reputation of the Complainant's JCDECAUX trademark, as well as the composition of the disputed domain name, which incorporates the mark in its entirety together with the geographic element "br", suggesting an affiliation with the Complainant's Brazilian operations. In these circumstances and given the absence of any plausible legitimate use by the Respondent, the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

The disputed domain name <jcdecaux-br.com> was previously used to display an authentication interface reproducing the Complainant's trademark and requesting users to enter login credentials. The disputed domain name now triggers a Google Safe Browsing warning indicating that phishing activity has recently been detected on the site. Previous panels have held that the use of a domain name for illegal activity, including phishing or attempting to collect personal data by impersonating a complainant, constitutes bad faith. See [WIPO Overview 3.0](#), section 3.4. Given the notoriety of the JCDECAUX trademark and the Respondent's actions aimed at deceiving Internet users into believing they were interacting with the Complainant, the Panel concludes that the disputed domain name was registered and used 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 names <jcdecaux-br.cc> and <jcdecaux-br.com> be transferred to the Complainant.

/Gustavo Patricio Giay/

Gustavo Patricio Giay

Sole Panelist

Date: November 17, 2025