

ADMINISTRATIVE PANEL DECISION

JCDECAUX SE. v. LIU HUA

Case No. D2025-3752

1. The Parties

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

The Respondent is LIU HUA, Mexico.

2. The Domain Name and Registrar

The disputed domain name <jcdecaux1.com> is 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 16, 2025. On September 16, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 17, 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 18, 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 23, 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 24, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 14, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 15, 2025.

The Center appointed Eva Fiammenghi as the sole panelist in this matter on October 21, 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 by Jean-Claude Decaux. The company is recognized as a global leader in outdoor advertising, operating in more than 80 countries and employing over 10,000 people worldwide. The Complainant designs, installs, and maintains urban furniture and advertising structures for public use, including bus shelters, billboards, transport advertising, and self-service bicycle systems.

The Complainant owns numerous trademark registrations for the mark JCDECAUX around the world, including (among others):

- Mexico Trademark JCDECAUX, Reg. No. 1201464, registered on February 15, 2011 in class 35; and
- International Trademark JCDECAUX, Reg. No. 803987, registered on November 27, 2001, in classes 6, 9, 11, 19, 20, 35, 37, 38, 39, 41, and 42.

The Complainant is also the owner of several domain names incorporating its mark, including <jcdecaux.com>, registered since June 23, 1997, and actively used it as the company's official website.

The disputed domain name, <jcdecaux1.com>, was registered on September 11, 2025, and resolves to a website in Portuguese, displaying the Complainant's mark, requiring a phone number and password to login and showing a tab for corporate recruitment.

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 identical or confusingly similar to its well-known JCDECAUX trademark, reproducing the mark in its entirety with the mere addition of the number "1", which does not prevent a finding of confusing similarity.

The Complainant further asserts that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant has never authorized the Respondent to use its trademark, nor is there any evidence that the Respondent is commonly known by the disputed domain name.

The Complainant argues that the Respondent registered and is using the disputed domain name in bad faith. The Respondent has intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's trademark.

The Complainant therefore requests the transfer of the disputed domain name.

B. Respondent

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

6. Discussion and Findings

Under paragraph 4(a) of the Policy, to succeed the Complainant must prove that:

- (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 was registered and is being used in bad faith.

These elements are discussed in turn below. In considering these elements, paragraph 15(a) of the Rules provides that the Panel shall decide the Complaint on the basis of statements and documents submitted and in accordance with the Policy, the Rules and any other rules or principles of law that the Panel deems applicable.

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 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 mark is reproduced 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.

Although the addition of the number "1" 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 name 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 a respondent may demonstrate rights or legitimate interests in a domain name.

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.

The Respondent is not an authorized distributor of the Complainant and has no connection or affiliation with the Complainant that would justify its registration and use of the disputed domain name. Nor has the Respondent been commonly known by the disputed domain name or demonstrated any bona fide offering of goods or services noting the disputed domain name resolves to a page displaying the Complainant's mark, requiring a phone number and password to login, and showing a tab for corporate recruitment.

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 finds that the Respondent has registered and used the disputed domain name in bad faith.

The Complainant's JCDECAUX trademark is well known internationally. The disputed domain name was registered in September 2025, many years after the Complainant's trademarks and domain names had become widely known and recognized in the advertising industry.

The Panel finds that the Respondent must have been aware of the Complainant and its trademark at the time of registration. The addition of the number "1" to the Complainant's trademark indicates an intentional attempt to create a misleadingly similar domain name for the purpose of impersonation. The use of the disputed domain name for a website displaying the Complainant's trademark, requiring a phone number and password to login, and showing a tab for corporate recruitment, which demonstrates the Respondent's intention for possible fraudulent activities.

Although the disputed domain name does not appear to have been substantively used except for the described content above, considering the distinctiveness and reputation of the Complainant's trademark, the composition of the disputed domain name clearly targeting the Complainant, the potential fraudulent use for recruitment related activities, and the lack of any response from the Respondent, the Panel finds that the circumstances of the case clearly demonstrate that the Respondent has registered and used the disputed domain name in bad faith.

Panels have held that the use of a domain name for illegal activity, including impersonation/passing off, 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 name 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 name <jcdecaux1.com> be transferred to the Complainant.

/Eva Fiammenghi/

Eva Fiammenghi

Sole Panelist

Date: November 4, 2025