

ADMINISTRATIVE PANEL DECISION

Ile-De-France Mobilités v. Kathryn Dadson and Host Master, Njalla Okta LLC
Case No. D2025-4212

1. The Parties

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

The Respondents are Kathryn Dadson and Host Master, Njalla Okta LLC, United States of America (the “United States”).

2. The Domain Names and Registrars

The disputed domain name <navigo-lledefrance.com> is registered with Tucows Domains Inc.

The disputed domain name <navigo-llesdefrance.com> is registered with Hosting Concepts B.V. d/b/a Registrar.eu. (collectively the “Registrars”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 14, 2025. On October 14, 2025, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. On October 14 and 15, 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 Respondent (Redacted for Privacy) and contact information in the Complaint.

The Center sent an email communication to the Complainant on October 16, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaint(s) 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 an amended Complaint on October 21, 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 Respondents of the Complaint, and the proceedings commenced on October 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 18, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on November 19, 2025.

The Center appointed Peter Burgstaller as the sole panelist in this matter on November 24, 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 a French state-owned entity that is responsible for organizing and operating major public transportation services in Paris and its suburbs (the "Île-de-France" region). To access public transportation organized by the Complainant, passengers may choose among various subscription offers, including the Navigo card which is a transportation pass launched more than twenty years ago (in 2001), enabling both residents and non-residents of the Île-de-France region to utilize public transportation services, such as metro, buses, and trains (Annexes C, C1 and D to the Complaint).

The Complainant owns trademark registrations for ILE-DE-FRANCE MOBILITES as well as NAVIGO, inter alia:

- French trademark registration ILE-DE-FRANCE MOBILITES (word), Registration No. 4351425, registered on July 28, 2017;
- French trademark registration  (figurative), Registration No. 4359694, registered on August 25, 2017;
- French trademark registration NAVIGO (word), Registration No. 3334053, registered on February 18, 2005;
- French trademark registration NAVIGO (word), Registration No. 3675722, registered on February 12, 2009; and
- French trademark registration NAVIGO (word), Registration No. 4266294, registered on August 26, 2016 (Annexes E1 – E5 to the Complaint).

The Complainant further owns and uses several domain names containing the mark "iledefrance", e.g. <iledefrance-mobilites.fr> and <iledefrance-mobilites.com>, both registered on March 31, 2017 (Annexes F1 and F2 to the Complaint) as well as the domain name <navigo.fr> registered on May 23, 2006 (Annex G to the Complaint).

The disputed domain name <navigo-llesdefrance.com> was registered on July 21, 2025 and the disputed domain name <navigo-lledefrance.com> on July 11, 2025 (Annex A1 and A2 to the Complaint).

At the time of filing the Complaint the disputed domain name <navigo-lledefrance.com> did not resolve to a website with material content; however, the disputed domain name <navigo-llesdefrance.com> resolved to a website displaying the Complainant's logo  and asking Internet user for personal information e.g. email addresses and other information when creating an account to easily manage subscriptions and travel preferences.

5. Parties' Contentions

A. Complainant

The Complainant asks for consolidating disputes against different disputed domain names' registrants in a single proceeding since there is a set of indicators that suggest that the disputed domain names were registered by the same entity.


Further, 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 contends that the NAVIGO and ILE-DE-FRANCE-MOBILITES trademarks are well known especially in France; it notes that the disputed domain names entirely incorporate such trademarks and they only replaced in the word "ile" the initial letter "i" with "l" and regarding the disputed domain name <navigo-llesdefrance.com> the Respondents added the letter "s" between the words "lle" and "de" which all of them are common, obvious and intentional misspellings of the Complainant's trademark ILE-DE-FRANCE-MOBILITES, which do not prevent a finding of confusing similarity.

Further, the Complainant alleges that there is no relationship between the Complainant and the Respondents and they are not using the disputed domain names in connection with a bona fide offering of goods or services. Rather, the disputed domain names directly refer to the Complainant's NAVIGO card, a widely recognized public transport pass used exclusively within the Île-de-France region and this region. By incorporating the NAVIGO mark in its entirety and referring to this region, the Respondents are clearly intending to exploit the Complainant's reputation and to attract Internet users seeking access to information or customer services related to the Complainant's offerings.

The Complainant alleges that by making references to it, as well as featuring its figurative trademark, the Respondents' website suggested that they are affiliated with the Complainant, which is not the case. Finally, the Respondents are not commonly known by the disputed domain names.

The Complainant moreover contends, that the overall composition of the disputed domain names shows a deliberate attempt to capitalize on the Complainant's brand recognition, mislead consumers, and divert Internet traffic for illegitimate purposes. The combination of the complete reproduction of the famous NAVIGO trademark and the imitation of the ILE-DE-FRANCE-MOBILITES trademark leaves no doubt that the Respondents registered the disputed domain names in bad faith, with the clear intention to create confusion and unfairly benefit from the Complainant's goodwill.

The Complainant further contends that, although the disputed domain name <navigo-lledefrance.com> resolves to an inactive website, this passive holding is within the concept of bad faith use under the Policy. As for the disputed domain name <navigo-llesdefrance.com>, it refers to a website which replicates the Complainant's website, copying layout and information as well as displaying the Complainant's figurative trademark  and instructs in a fraudulent manner users to create an account "in order to easily manage their subscriptions and travel preferences" with the sole purpose to collect personal data.

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 disputed 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 same identity or common control, the Panel notes that:

- the disputed domain names were registered within 10 days and they have a very similar naming pattern: they are composed of two different and independent trademarks of the Complainant with identical common and obvious misspellings ("lle" instead of "ile");
- the email addresses provided by the Respondents in the registrant details - [...]yopmail.com and [...]@njal.la - appear to be anonymized or suspicious: the use of a "Yopmail" address, which is a temporary and disposable email service, and of an "Njal.la" address, a service well known for privacy focused and anonymous domain registration practices, strengthen this impression; and
- the Respondents did not react in any way – the Respondents did not file a Response.

Because of these commonalities, this Panel is convinced that the Respondents are deliberately concealing their true identity and that the disputed domain names were registered by the same domain name holder or they are at least under common control.

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 (referred to below as "the Respondent") in a single proceeding.

6.2. Substantive Issues

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

- (i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests with respect to the disputed domain names; and
- (iii) the disputed domain names have been 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 submitted evidence which incontestably and conclusively establishes rights in the mark NAVIGO and ILE-DE-FRANCE-MOBILITES.

In the present case the disputed domain names are confusingly similar to these marks in which the Complainant has rights since these marks remain recognizable within the disputed domain names.

Although both disputed domain names replace the letter "i" with "l" in the word "ile", omit the hyphen between "ILE-DE-FRANCE" and regarding the disputed domain name <navigo-llesdefrance.com> adds the letter "s" after the word "lle", which all of them are common and obvious misspellings, this does not prevent a finding of confusing similarity under the first element of the Policy in the Panels view, since the relevant trademarks remain recognizable within the disputed domain names ([WIPO Overview 3.0](#), section 1.8 and 1.9).

Finally, it has also long been held that generic Top-Level Domains ("gTLD") are generally disregarded when evaluating the confusing similarity between a disputed domain name and a trademark. [WIPO Overview 3.0](#), section 1.11.

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.

While 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 often impossible 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. 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 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, since it has never assigned, granted, licensed, sold, transferred or in any way authorized the Respondent to register or use the NAVIGO and ILE-DE-FRANCE-MOBILITES trademarks in any manner. The Respondent did not reply and hence has not rebutted the Complainant's contentions.

Further, the Complainant focuses on the fact that its trademarks are well known with regard to organizing and operating major public transportation services in the "Île-de-France" region and the Complainant provided suitable evidence that it is inconceivable that the Respondent would not have been aware of this when registering the disputed domain names.

Moreover, the composition of the disputed domain names, a composition of the NAVIGO pass with the "Île-de-France" region together with the fact that the disputed domain name <navigo-llesdefrance.com> resolves to websites that purported to offer identical services than the Complainant, while displaying the figurative trademark of the Complainant, affirms the Respondent's intention of taking unfair advantage of the likelihood of confusion between the disputed domain names and the Complainant's marks.

Based on the available record, the Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

As stated in many decisions rendered under the Policy (e.g. *Robert Ellenbogen v. Mike Pearson*, WIPO Case No. [D2000-0001](#)) both conditions, registration and use in bad faith, must be demonstrated; consequently, the Complainant must show that:

- the disputed domain names were registered by the Respondent in bad faith; and
- the disputed domain names are being used by the Respondent in bad faith.


In the present case, the Complainant provided evidence which demonstrates that it has rights and is the owner of the registered trademarks NAVIGO and ILE-DE-FRANCE-MOBILITES, registered and used long before the disputed domain names were registered.

Further, the Complainant registered and is using various domain names containing the marks NAVIGO and ILE-DE-FRANCE-MOBILITES, e.g. <iledefrance-mobilites.fr>, <iledefrance-mobilites.com> and <navigo.fr>.

It is therefore inconceivable for this Panel that the Respondent registered and used the disputed domain names without knowledge of the Complainant's rights, which leads to the necessary inference of bad faith. [WIPO Overview 3.0](#), section 3.2.2.

This finding is supported by the special composition of the disputed domain names, consisting of two independent trademarks of the Complainant, with common and obvious misspellings in both disputed domain names. [WIPO Overview 3.0](#), section 3.1.4.

Therefore, the Panel is convinced that the disputed domain names were registered in bad faith by the Respondent.

The Complainant has put forward evidence that the disputed domain name <navigo-llesdefrance.com> was previously used by the Respondent to resolve to websites showing the Complainant's figurative trademark  and purported to offer services identical to those of the Complainant's and instructed in a fraudulent manner users to create an account "in order to easily manage their subscriptions and travel preferences" with the apparent purpose to collect personal data and log in data of Internet users.

This clearly disrupts the Complainant's business and shows that the Respondent intentionally attempts to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's marks, which constitutes bad faith use.

Although, at the time of filing of the Complaint the disputed domain name <navigo-lledefrance.com> did not resolve to a website with material content, panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3.

The evidence and documents produced and put forward by the Complainant together with the fact that the Respondent has failed to file a Response and therefore failed to present any evidence of any good faith registration and use with regard to the disputed domain names further prove that the disputed domain names were registered and are used by the Respondent in bad faith under paragraph 4(a)(iii) of the Policy.

Based on the available record, 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 <navigo-lledefrance.com> and <navigo-llesdefrance.com> be transferred to the Complainant.

/Peter Burgstaller/

Peter Burgstaller

Sole Panelist

Date: December 8, 2025