

ADMINISTRATIVE PANEL DECISION

Pluxee International v. Michael Nava, Domain Nerdz LLC
Case No. D2025-4222

1. The Parties

The Complainant is Pluxee International, France, represented by Areopage, France.

The Respondent is Michael Nava, Domain Nerdz LLC, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <pluxeegroup.org> (the “Disputed Domain Name”) is registered with Sav.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 14, 2025. On October 15, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On October 15, 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 (Unknown / REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 17, 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 October 20, 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 October 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 12, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on November 13, 2025.

The Center appointed Yuzo Wada as the sole panelist in this matter on November 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 is a French company spun-off from Sodexo Group in February, 2024. The Sodexo Group started its business in 1976 and is specialized in food services, facilities management and earlier in benefit and reward services, with 423,000 employees serving daily 80 million consumers in 45 countries. In 2023, Sodexo business relating to employee benefits and engagement solutions which was operated by Sodexo Pass International changed its name into Pluxee.

The Complainant delivers over 250 products to 37 million consumers through 500,000 clients connected to 1.7 million affiliated merchants in 29 countries. The Complainant is widely established among others in the United States where the Respondent is located.

For the PLUXEE trademark, the Complainant owns the French Trademark Registration No. 4905284 registered on October 14, 2022, and, International Registration No. 1706936 registered on November 2, 2022, and inter alia covering the United States.

The Complainant also owns numerous domain names corresponding to and/or containing the mark PLUXEE, namely: <pluxeegroup.com>, <pluxee.net>, <pluxee.info>, and many more.

The Disputed Domain Name was registered on September 8, 2025, and resolved to a webpage stating "The domain name pluxeegroup.org is for sale!".

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 the Complainant's PLUXEE trademark.

The Complainant alleges that the Respondent lacks any rights to or legitimate interests in the Disputed Domain Name.

The Complainant contends that the Respondent registered and is using the Disputed Domain Name in bad faith.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy requires that the complainant prove each of the following three elements to obtain a decision that a domain name should be either cancelled or transferred:

- (i) the domain name is 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 in respect of the domain name; and
- (iii) the 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.

The Panel finds that the Complainant has registered rights in the mark PLUXEE. The Panel further finds that the Disputed Domain Name is confusingly similar to this mark, since the Disputed Domain Name incorporates the entirety of the Complainant's trademark. The mere addition of the generic Top-Level-Domain ("gTLD") ".org" to the Disputed Domain Name does not prevent a finding of confusing similarity, neither does the addition of the non-distinctive term "group" to the Disputed Domain Name.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Under the second element of the Policy, the Complainant must show that the Respondent has no rights or legitimate interests with respect to the Disputed Domain Name. The Respondent may establish a right or legitimate interest in the Disputed Domain Name by demonstrating any of the following non-exhaustive circumstances listed in paragraph 4(c) of the Policy:

- (a) that the Respondent has used, or made preparations to use, the Disputed Domain Name or a name corresponding to the Disputed Domain Name in connection with a bona fide offering of goods or services prior to any notice of the dispute; or
- (b) that the Respondent has been commonly known by the Disputed Domain Name, even if the Respondent has not acquired any trademark rights; or
- (c) that the Respondent is making a legitimate noncommercial or fair use of the Disputed Domain Name without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Complainant's trademark registrations for PLUXEE predate the Respondent's registration of the Disputed Domain Name which is confusingly similar to the Complainant's trademarks. The Complainant has not licensed or otherwise consented to the Respondent's use of the trademarks in connection with the Disputed Domain Name. From the evidence in the case record, the Disputed Domain Name resolved to a website where it was offered for sale for the amount of USD 2,988.

Thus, the Respondent is not making a legitimate, noncommercial or fair use of the Disputed Domain Name without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark.

Although given the opportunity, the Respondent has not submitted any evidence in this case to demonstrate that the Respondent is the owner of any trademark rights similar to the Disputed Domain Name or that the Respondent is or has been commonly known by the Disputed Domain Name.

It is highly unlikely that the Respondent is commonly known by the name "pluxee", since the term is purely imaginative and therefore highly distinctive.

Thus, there is no evidence in the case record that refutes the Complainant's submissions, and the Panel concludes that the second element of the Policy has been established.

C. Registered and Used in Bad Faith

According to paragraph 4(a)(iii) of the Policy, the following circumstances, in particular but without limitation, shall be evidence of the registration and use in bad faith:

(i) circumstances indicating that the Respondent has registered or has acquired the Disputed Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Disputed Domain Name registration to the Complainant who is the owner of the trademark or service mark or to a competitor of that Complainant, for valuable consideration in excess of the Respondent's documented out-of-pocket costs directly related to the Disputed Domain Name; or

(ii) the Respondent has registered the Disputed Domain Name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding the Disputed Domain Name, provided that the Respondent has engaged in a pattern of such conduct; or

(iii) the Respondent has registered the Disputed Domain Name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the Disputed Domain Name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website or location or of a product or service on its website or location.

Based on the evidence submitted by the Complainant, the Panel finds that the Respondent registered and is using the Disputed Domain Name in bad faith.

The Disputed Domain Name was registered after the Complainant first acquired rights in the PLUXEE trademark. Without the authorization from the Complainant, the Disputed Domain Name resolves to a website offering the sale or lease of the Disputed Domain Name.

The Panel accepts the Complainant's contention that the Complainant's trademark PLUXEE is well known. The incorporation of a well-known trademark into a domain name by a registrant having no plausible explanation for doing so may be, in and of itself, an indication of bad faith (*Veuve Clicquot Ponsardin, Maison Fondée en 1772 v. The Polygenix Group Co.*, WIPO Case No. [D2000-0163](#); *General Electric Company v. CPIC NET and Hussain Syed*, WIPO Case No. [D2001-0087](#); *Microsoft Corporation v. Montrose Corporation*, WIPO Case No. [D2000-1568](#); *Intel Corporation v. The Pentium Group*, WIPO Case No. [D2009-0273](#)).

The Panel finds that Internet users are likely to be misled by the confusing similarity between the Disputed Domain Name and the Complainant's trademark into supposing that the Disputed Domain Name indicates a site belonging to, or authorized by, the Complainant. The only rational reason for using such a domain name would be to attract some of the Complainant's customers to the Respondent's site. This falls squarely within the scope of paragraph 4(b)(iv) of the Policy (*Inter Ikea Systems B.V. v. Daniel Woodson*, WIPO Case No. [D2011-1933](#)).

Moreover, the Disputed Domain Name has been advertised as being for sale for USD 2,988, which further suggests targeting of the Complainant. The Panel cannot find any justification for the registration and use of the Disputed Domain Name in such circumstances except to find that the Respondent registered and is using the Disputed Domain Name for the purpose of selling the Disputed Domain Name for valuable consideration likely in excess of the Respondent's out-of-pocket costs. That constitutes bad faith under paragraph 4(b)(i) of the Policy ([WIPO Overview 3.0](#), section 3.1.1).

In light of the above, the Panel concludes that the Disputed Domain Name was registered and is being used by the Respondent with the intent of selling the Disputed Domain Name for profit and/or to intentionally attempt to attract Internet users to the resulting website for commercial gain, by creating a likelihood of confusion with the Complainant's trademarks as described under paragraphs 4(b)(i) and 4(b)(iv) of the Policy.

Noting that the Disputed Domain Name incorporates a well-known trademark and that, except for the gTLD and the non-distinctive term "group", it is identical with the Complainant's domain name <pluxeegroup.com>, that no response has been filed, and that there appears to be no conceivable good faith use that could be made by the Respondent of the Disputed Domain Name, and considering all the facts and evidence, the Panel therefore finds that the requirements of paragraph 4(a)(iii) of the Policy are also fulfilled in this case.

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 <pluxeegroup.org> be transferred to the Complainant.

/Yuzo Wada/

Yuzo Wada

Sole Panelist

Date: December 5, 2025