

ADMINISTRATIVE PANEL DECISION

Carrefour SA v. Theresa Chavez
Case No. D2025-4568

1. The Parties

The Complainant is Carrefour SA, France, represented by IP Twins, France.

The Respondent is Theresa Chavez, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <carrefonr.com> is registered with Porkbun LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on November 4, 2025. On November 5, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 5, 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 (Whois Privacy, Private by Design, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 7, 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 a Complaint on November 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 November 13, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 3, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on December 5, 2025.

The Center appointed Xu Lin as the sole panelist in this matter on December 10, 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 Carrefour SA, a retail company founded in 1959 that is one of the pioneers of the hypermarket concept. It is listed on the Paris Stock Exchange (CAC 40). The company operates over 14,000 stores in more than 40 countries, with more than 384,000 employees.

The Complainant holds trademark registrations for CARREFOUR in multiple jurisdictions, including:

- International Trademark CARREFOUR No. 351147, registered on October 2, 1968, in classes 1 to 34;
- European Union Trademark CARREFOUR No. 005178371, registered on August 30, 2007, in classes 9, 35, and 38;
- United States Trademark CARREFOUR No. 6763415, registered on June 21, 2022, in class 35.

The Complainant's domain name <carrefour.fr>, registered in 2005, resolves to an online shopping website operated by the Complainant. The Complainant's domain name <carrefour.com>, registered in 1995, resolves to the Complainant's corporate website.

The Respondent is reportedly based in the United States.

The disputed domain name <carrefonr.com>, was registered on October 21, 2025. It is currently inaccessible and does not host any active content.

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:

Firstly, the disputed domain name is confusingly similar to the CARREFOUR trademarks.

- The disputed domain name <carrefonr.com> reproduces the Complainant's trademark CARREFOUR with only one minor typographical variation: the letter "u" in the mark is replaced by "n", resulting in "carrefonr". This minimal alteration does not prevent a finding of confusing similarity.
- As held in a prior UDRP decision, such deliberate single-letter substitution in a well-known mark, as in the present case, constitutes typosquatting and cannot be considered a bona fide offering of goods or services.
- The deliberate imitation of the Complainant's mark is intended to exploit typographical errors rather than to identify any genuine business or noncommercial purpose.

Secondly, the Respondent has no rights or legitimate interests in respect of the disputed domain name:

- The domain is inactive and constitutes typosquatting. Jurisprudence holds that such practice is inherently incompatible with a legitimate offering of goods or services.
- The Complainant has never permitted the Respondent to use the CARREFOUR mark in any way. There is no evidence the Respondent is known by the domain name. The use of a privacy service weighs against any finding of rights or legitimate interests.

- The disputed domain name resolves to an inactive error page. Registering a typo of a well-known mark cannot be considered fair or noncommercial use.

Finally, the disputed domain name was registered and is being used in bad faith:

- The Respondent deliberately targeted the Complainant's globally well-known CARREFOUR trademark by registering a typosquatting variant long after the mark's establishment. There is no plausible reason for the Respondent to have registered the disputed domain name other than to capitalize on or disrupt the Complainant's reputation. The Respondent has used a privacy service to conceal its identity in the Whois record, which use can be an additional indicator of bad faith where there is no other plausible explanation for registration and where the domain name reproduces a famous mark.
- The Respondent's passive holding of the disputed domain name, combined with its deliberate imitation of the Complainant's well-known mark, concealment of identity, and absence of any conceivable good-faith use, clearly demonstrates that the disputed domain name is being used in bad faith.

B. Respondent

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

6. Discussion and Findings

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 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.

A domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. This stems from the fact that the domain name contains sufficiently recognizable aspects of the relevant mark. [WIPO Overview 3.0](#), section 1.9.

In this case, the disputed domain name consists of an intentional misspelling of the Complainant's CARREFOUR trademark, in which the letter "u" is replaced by "n" resulting in "carrefonr". This minor alteration does not prevent a finding of confusing similarity, as the disputed domain name retains sufficiently recognizable elements of the Complainant's mark. Accordingly, the Panel finds that the disputed domain name is confusingly similar to the Complainant's trademark under the first element of the Policy.

In what concerns the addition of the generic Top-Level Domain ("gTLD") ".com" in relation to the disputed domain name, such is viewed as a standard registration requirement, and is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1.

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.

The Complainant has not granted any license or right to the Respondent to use its trademark, and there is no evidence that the Respondent has been commonly known by the disputed domain name, or has used the disputed domain name in connection with a bona fide offering of goods or services. The evidence submitted by the Complainant indicates that the disputed domain name is currently inaccessible and does not host any active content. The Respondent’s passive holding of the disputed domain name that is confusingly similar to the Complainant’s CARREFOUR trademark cannot confer any rights or legitimate interests in the disputed domain name under the circumstances of the case.

Furthermore, the disputed domain name consists of a common, obvious, or intentional misspelling of the Complainant’s CARREFOUR trademark in which the letter “u” is replaced by “n”. Internet users may not notice such a subtle difference between the disputed domain name and the Complainant’s domain name <carrefour.com>. This signals an intention on the part of the Respondent to confuse users seeking or expecting the Complainant.

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 Respondent has registered the disputed domain name long after the Complainant’s CARREFOUR trademark had achieved global renown, thus the Respondent very likely deliberately registered a typosquatting variant thereof - an act manifestly intended to target the Complainant’s well-established mark and free-ride on its substantial goodwill, which directly reflects the intent to mislead consumers or obtain unfair advantage contemplated under paragraph 4(b) of the Policy. [WIPO Overview 3.0](#), section 3.1. Therefore, the Panel finds that the disputed domain name was registered in bad faith.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent’s registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

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. Having reviewed the available record, the Panel finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy given the reputation of the Complainant's trademark, the structure of the disputed domain name, and the lack of a response from the Respondent. In addition, the disputed domain name is a typographical variant of the Complainant's mark, which constitutes typosquatting, further supporting a finding of 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 name <carrefonr.com> be transferred to the Complainant.

/Xu Lin/

Xu Lin

Sole Panelist

Date: December 23, 2025