

ADMINISTRATIVE PANEL DECISION

JCDECAUX SE v. Paul Goode

Case No. D2025-4801

1. The Parties

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

The Respondent is Paul Goode, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <jcdecauxuk.com> is registered with IONOS SE (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 19, 2025. On November 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 20, 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 November 20, 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 November 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 November 21, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 11, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on December 12, 2025.

The Center appointed Nesrine Roudane as the sole panelist in this matter on December 16, 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.

No further submissions were filed, and the Panel has not issued any procedural orders.

4. Factual Background

The Complainant, JCDECAUX SE, is a company headquartered in Neuilly-sur-Seine, France. Founded in 1964, the Complainant is active in the outdoor advertising sector (including street furniture, transport advertising, and billboard advertising) and operates internationally. According to the Complaint, the Complainant is present in more than 80 countries; it is listed on Euronext Paris; it employed around 12,000 people; and it reported EUR 3,935.3 million in revenue for 2024 (Complaint, Annex 3).

The Complainant is the owner of registered trademark rights in the mark JCDECAUX. In particular, the Complainant relies on the following registration:

- International trademark (word mark) JCDECAUX, International Registration No. 803987, registered on November 27, 2001 (Complaint, Annex 4).

The Complainant also maintains a domain name portfolio incorporating its JCDECAUX mark, including the domain name <jcdecaux.com>, registered on June 23, 1997 (Complaint, Annex 5).

The disputed domain name <jcdecauxuk.com> was registered on November 15, 2025 (Complaint, Annex 1). At the time of the filing of the Complaint, the disputed domain name resolved to a parking / holding page (Complaint, Annex 6). The record further shows that the disputed domain name is configured with active Mail Exchanger (“MX”) records (Complaint, Annex 7).

The Respondent is identified in the Complaint as Paul Goode, United Kingdom (Complaint, Annex 1). The Complaint includes the Respondent's contact details as reflected in the Whois record, including an email address that includes the Complainant's trademark (Complaint, Annex 1). The record contains no evidence of any relationship, license, or authorization between the Complainant and the Respondent.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the three elements required under paragraph 4(a) of the Policy and requests the transfer of the disputed domain name.

First, the Complainant asserts that the disputed domain name <jcdecauxuk.com> is confusingly similar to its JCDECAUX trademark, which is reproduced in its entirety. The Complainant submits that the addition of the geographic term “uk” (short for “United Kingdom”) does not prevent a finding of confusing similarity and may, on the contrary, increase confusion by suggesting an official UK-related presence of the Complainant. The Complainant also notes that the generic Top-Level Domain (gTLD) “.com” is disregarded for purposes of the first element.

Second, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant states, *inter alia*, that the Respondent is not affiliated with the Complainant, that the Complainant has not licensed or authorized the Respondent to use the JCDECAUX trademark or to register a domain name incorporating it, and that the Respondent is not commonly known by the disputed domain name. The Complainant further submits that the disputed domain name resolves to a parking page and that such use does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use.

Third, the Complainant contends that the disputed domain name was registered and is being used in bad faith. The Complainant emphasizes the distinctiveness and reputation of the JCDECAUX trademark and submits that it is inconceivable that the Respondent registered the disputed domain name without knowledge of the Complainant's rights. The Complainant argues that the disputed domain name's current passive holding does not prevent a finding of bad faith, particularly given the composition of the disputed domain name (JCDECAUX plus "uk"), the absence of any conceivable good-faith use, and the Respondent's failure to provide any explanation. The Complainant also points to the configuration of MX records for the disputed domain name as an additional circumstance suggesting a risk of abusive use (including potential email-based impersonation).

B. Respondent

The Respondent did not submit any response and did not otherwise reply to the Complainant's contentions.

6. Discussion and Findings

The Panel has reviewed the record, including the Complaint and annexes submitted by the Complainant, as well as the applicable provisions of the Policy, the Rules, and the Supplemental Rules.

Under paragraph 4(a) of the Policy, the Complainant must establish, on the balance of probabilities, each of the following:

- (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 has been registered and is being used in bad faith.

The Panel notes that the Respondent did not submit a Response. Pursuant to paragraph 14(b) of the Rules, the Panel may draw such inferences from the Respondent's default as it considers appropriate. The Complainant, however, must still establish each element required by paragraph 4(a) of the Policy.

The language of the Registration Agreement is English. Accordingly, pursuant to paragraph 11 of the Rules, the language of the proceeding is English.

The Panel addresses each element in turn, with reference to the record and to relevant UDRP jurisprudence, including the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)").

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 has shown rights in respect of a trademark for the purposes of the Policy, notably International Registration No. 803987 for the word mark JCDECAUX, registered on November 27, 2001 (Complaint, Annex 4). [WIPO Overview 3.0](#), section 1.2.1.

The disputed domain name <jcdecauxuk.com> reproduces the Complainant's JCDECAUX mark in its entirety. The addition of the term "uk", which is a geographic abbreviation commonly referring to the United Kingdom, does not prevent a finding of confusing similarity. [WIPO Overview 3.0](#), section 1.8.

The gTLD ("com") is a standard registration requirement and is disregarded for the purposes of assessing confusing similarity under the Policy. [WIPO Overview 3.0](#), section 1.11.1.

The Panel finds that the disputed domain name is confusingly similar to a trademark in which the Complainant has rights. The first element of paragraph 4(a) of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy lists circumstances by which a respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof rests with the complainant, panels recognize that proving the absence of rights or legitimate interests can involve the difficulty of “proving a negative”, as relevant information is often within the respondent’s control. Accordingly, where a complainant makes out a *prima facie* case that a respondent lacks rights or legitimate interests, the burden of production shifts to the respondent to come forward with evidence demonstrating rights or legitimate interests. If the respondent fails to do so, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the record, the Panel finds that the Complainant has established a *prima facie* case that the Respondent lacks rights or legitimate interests in the disputed domain name. In particular:

- There is no evidence that the Complainant has licensed, authorized, or otherwise permitted the Respondent to use the JCDECAUX mark in any manner.
- There is no evidence that the Respondent has been commonly known by the disputed domain name or by a corresponding name.
- The disputed domain name resolves to a parking/placeholder page (Complaint, Annex 6), and there is no evidence of any bona fide offering of goods or services, or of legitimate noncommercial or fair use.

The Respondent has not filed a Response and has not rebutted the Complainant’s *prima facie* showing or provided any evidence falling within paragraph 4(c) of the Policy or otherwise demonstrating rights or legitimate interests.

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name. The second element of paragraph 4(a) of the Policy has been established.

C. Registered and Used in Bad Faith

For the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances which, if present, shall be evidence of registration and use of a domain name in bad faith. The Panel further notes that bad faith may be found based on the totality of circumstances, including circumstances not limited to those enumerated in paragraph 4(b). [WIPO Overview 3.0](#), section 3.2.1.

The Complainant’s JCDECAUX mark is distinctive and long predates the registration of the disputed domain name. The disputed domain name was registered on November 15, 2025, more than two decades after the Complainant’s trademark registration relied upon in this proceeding (Complaint, Annexes 1 and 4). The disputed domain name incorporates the JCDECAUX mark in its entirety and adds the geographic term “uk”, which on its face suggests a United Kingdom-related presence or branch. In the circumstances of this case, the Panel finds it highly unlikely that the Respondent registered the disputed domain name without knowledge of the Complainant and its trademark rights, and the composition of the disputed domain name supports a finding of deliberate targeting.

The disputed domain name currently resolves to a parking/placeholder page (Complaint, Annex 6). Panels have found that non-use of a domain name does not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. In assessing passive holding, panels consider factors including (i) the degree of distinctiveness or reputation of the complainant’s mark; (ii) the failure of the respondent to submit a response or provide evidence of actual or contemplated good-faith use; and (iii) the implausibility of any good-faith use to which the domain name may be put.

In this case, the Panel notes in particular:

- the distinctiveness and longstanding nature of the Complainant's JCDECAUX trademark rights;
- the Respondent's failure to submit any Response or to provide any explanation for the registration; and
- the absence, on the record, of any plausible good-faith use of a domain name that wholly incorporates the Complainant's mark together with a geographic term suggestive of affiliation.

The Panel also considers relevant that MX records are configured for the disputed domain name (Complaint, Annex 7). Panels have recognized that the configuration of MX records can support an inference that a domain name may be used for email purposes, which may carry an increased risk of deception (e.g., impersonation or other fraudulent email activity) where the domain name incorporates a complainant's mark and there is no plausible legitimate use. See [WIPO Overview 3.0](#), section 3.4. While the Panel does not need to find actual misuse of email in order to assess bad faith, the existence of configured MX records is a relevant circumstance reinforcing the inference that the disputed domain name was registered and is being held for potentially abusive purposes.

Taking into account the totality of circumstances, the Panel finds that the disputed domain name was registered and is being used in bad faith within the meaning of paragraph 4(a)(iii) of the Policy. The third element of paragraph 4(a) of the Policy has been established.

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 <jcdecauxuk.com> be transferred to the Complainant.

/Nesrine Roudane/

Nesrine Roudane

Sole Panelist

Date: January 2, 2026