

ADMINISTRATIVE PANEL DECISION

Carrefour SA v. Jean Laurent

Case No. D2025-4833

1. The Parties

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

The Respondent is Jean Laurent, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <carrefour-eu.net> is registered with Combell NV (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 20, 2025. On November 20, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 26, 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 and contact information in the Complaint. The Center sent an email communication to the Complainant on November 27, 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 28, 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 December 3, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 23, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on December 24, 2025.

The Center appointed Keiji Kondo as the sole panelist in this matter on December 30, 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, Carrefour SA, is a public limited company registered in the trade and companies register of Evry (France). Founded in 1959, the Complainant, under the concept of hypermarkets, operates globally, with more than 384,000 employees worldwide, 1.3 million daily visitors in its webstores, and annual revenues in the tens of billions of Euros. The Complainant also has a number of followers in such media as Facebook and LinkedIn. The Complainant is listed on Euronext Paris (CAC 40 index), and was a Premium Partner of the Paris 2024 Olympic Games.

The Complainant has a number of trademark registrations for CARREFOUR covering, inter alia, products of perfumes and cosmetics, namely, goods in International Class 3, and a wide variety of goods in other classes. Among the Complainant's trademark registrations, the following trademark registrations are representative:

International Registration (WIPO) Number 191353, registered on March 9, 1956 for class 3; and International Registration (WIPO) Number 351147, registered on October 2, 1968 for classes 1 – 34.

The Complainant also owns domain names <carrefour.com> and <carrefour.net>. The Complainant uses these domain names to reach online customers through multiple social media platforms.

The disputed domain name was registered on September 30, 2025. The disputed domain name resolves to a standard parking page automatically generated by the Registrar.

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 Complainant owns numerous trademark registrations for the Complainant's trademark, all predating the creation of the disputed domain name. The Complainant also operates its online business using several domain names incorporating its trademark, such as <carrefour.eu>, <carrefour.fr>, <carrefour.com>, and <carrefour.net>.

Under paragraph 4(a)(i) of the Policy, the threshold test for confusing similarity is typically satisfied when a domain name incorporates a complainant's trademark in its entirety (WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7). The disputed domain name reproduces the Complainant's trademark in its entirety.

The additional elements in the disputed domain name, the hyphen and the geographic abbreviation "eu", do not prevent a finding of confusing similarity ([WIPO Overview 3.0](#), section 1.8). UDRP panels routinely affirm that elements such as "eu", "shop", "store", "group", or "online" are insufficient to distinguish a domain name from the trademark it incorporates. In this case, the term "eu" is particularly likely to reinforce confusion, as the Complainant operates extensively within the European Union and owns its own domain name, <carrefour.eu>. On the contrary, the addition of geographic terms may even increase the impression of affiliation.

The generic Top-Level Domain ".net" is irrelevant to the confusing similarity analysis ([WIPO Overview 3.0](#), section 1.11).

Given the Complainant's longstanding and widely recognized trademark, the full reproduction of the trademark in the disputed domain name, and the non-distinctive nature of the added geographic element, the disputed domain name is confusingly similar to the Complainant's trademark under paragraph 4(a)(i) of the Policy.

Pursuant to paragraph 4(c) of the Policy, the following circumstances, if proven, may demonstrate rights or legitimate interests:

- (i) before any notice of the dispute, the respondent used, or made demonstrable preparations to use, the domain name in connection with a bona fide offering of goods or services;
- (ii) the respondent has been commonly known by the domain name, even if it has acquired no trademark or service mark rights; or
- (iii) the respondent is making a legitimate non-commercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the complainant's mark.

The Complainant submits that none of these circumstances apply in the present case.

The Complainant has never authorized the Respondent to register or use a domain name incorporating the Complainant's trademark. The Respondent is not affiliated with the Complainant and has never been licensed, permitted, or otherwise authorized to use the Complainant's trademark in any manner.

No evidence shows that the Respondent is commonly known by the disputed domain name. There is no indication that the Respondent is, or has ever been, commonly known by the name "Carrefour" or by any similar designation.

The disputed domain name resolves to a standard parking page generated automatically by the Registrar, promoting registrar services and offering no content related to any business of the Respondent. Such use is neither active nor indicative of a bona fide offering of goods or services.

Given the well-known and highly distinctive nature of the Complainant's trademark, it is difficult to conceive of any plausible or legitimate commercial use of a domain name reproducing the Complainant's trademark in its entirety without the Complainant's authorization. When a respondent registers a domain name incorporating a famous trademark, any use would inevitably suggest sponsorship or endorsement by the trademark owner, leaving no room for a bona fide or legitimate commercial purpose.

Given the absence of authorization, the absence of evidence showing that the Respondent is commonly known by the disputed domain name, the absence of any bona fide offering or legitimate use, and the inherently opportunistic registration of a domain name incorporating a well-known trademark, the Complainant has clearly established a *prima facie* case. The burden of proof now shifts to the Respondent. As of the filing date, the Respondent has provided no explanation or evidence to rebut the Complainant's assertions.

Accordingly, the Respondent has no rights or legitimate interests in the disputed domain name within the meaning of paragraph 4(a)(ii) of the Policy.

The Complainant's trademark is highly distinctive and widely known internationally, including within the European Union where the Complainant operates thousands of stores and maintains a strong online presence. According to [WIPO Overview 3.0](#), section 3.2.2, registering a domain name that incorporates a well-known trademark "without authorization and without any plausible explanation" constitutes a strong indicator of opportunistic bad faith. This principle applies squarely here; the Respondent chose a domain name that reproduces the Complainant's trademark in its entirety, combined with the geographic term "eu", a choice that clearly targets the Complainant's operations in Europe.

The disputed domain name was registered in 2025, decades after the Complainant secured trademark protection worldwide and long after the Complainant's brand became globally recognized. As noted in [WIPO Overview 3.0](#), section 3.8.2, the more well-known a mark, the more difficult it is for a respondent to credibly claim unawareness of the complainant's rights at the time of registration.

The Respondent cannot plausibly demonstrate any legitimate reason for selecting a domain name that reproduces a well-known trademark in its entirety. Considering the widespread reputation of the Complainant's trademark, it is simply not credible that the Respondent was unaware of the Complainant's rights at the time of registration.

Given the distinctive nature of the Complainant's trademark, its widespread reputation, the Respondent's complete lack of explanation, and the targeting implied by the "eu" element, the only reasonable conclusion is that the Respondent knew of the Complainant's trademark rights and registered the disputed domain name with the Complainant squarely in mind. Accordingly, the Respondent registered the disputed domain name in bad faith within the meaning of paragraph 4(a)(iii) and 4(b) of the Policy.

Although the disputed domain name resolves only to a standard parking page automatically generated by the Registrar, this does not preclude a finding of bad-faith use. As established in *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#), and reflected in [WIPO Overview 3.0](#), section 3.3, "the nonuse of a domain name (passive holding) does not prevent a finding of bad faith." Panels assess all circumstances of the case, including the distinctiveness of the trademark, the respondent's concealment or failure to respond, and the implausibility of any good-faith use. All these elements are present here. The Respondent has registered a domain name that wholly incorporates a well-known and highly distinctive trademark, combined with a geographic reference ("eu") that points directly to one of the Complainant's principal regions of operation.

The Respondent provides no explanation of any legitimate purpose for the registration and has not taken any steps to make a credible good-faith use of the disputed domain name. The parking page contains generic registrar information and does not reflect any real activity by the Respondent. However, this passive holding is sufficient to constitute bad-faith use when, as here, "the circumstances indicate that the respondent's holding prevents the trademark owner from reflecting its mark in a corresponding domain name" and when "any plausible use would likely be illegitimate" ([WIPO Overview 3.0](#), section 3.3).

In light of the well-known character of the Complainant's trademark, the lack of any legitimate explanation, and the absence of any credible scenario in which the disputed domain name could be used in good faith, the Respondent's passive holding must be interpreted as bad-faith use under paragraph 4(a)(iii) and paragraph 4(b) of the Policy.

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 3.0](#), section 1.7.

The entirety of the Complainant's trademark is reproduced within the disputed domain name. Addition of "eu" does not prevent a finding of a confusing similarity and any average observer of the disputed domain name would easily recognize the Complainant's trademark in the disputed domain name. Addition of ".net",

a gTLD, should be disregarded in finding a confusing similarity. Accordingly, the disputed domain name is confusingly similar to the Complainant's trademark for the purposes of the Policy.

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.

The Respondent's name is in no way similar to the disputed domain name. Therefore, it is highly unlikely that the Respondent has been known by the disputed domain name, or the Complainant's trademark.

The disputed domain name resolves to a parking website, and the Respondent has submitted no response to the Complaint. Therefore, it is unlikely that the Respondent had demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods or services, or to make a legitimate noncommercial or fair use.

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 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 specifically notes that the Complainant's trademark registration dates back to 1956, nearly seventy years predating the registration of the disputed domain name. It is inconceivable that the Respondent registered the disputed domain name without knowledge of the Complainant's trademark. In view of the fact that the Complainant's status in the online market, and the fact that the Complainant's trademark is reproduced in its entirety in the disputed domain name, the Panel finds that the Respondent intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of its website. In addition, the addition of "-eu" should be regarded as indicative of the Respondent's intention to target the Complainant's business in the European Union, and to enhance the likelihood of confusion between the Complainant's business and the disputed domain name.

Further, considering the circumstances presented in this case, the Panel finds that the disputed domain name is being used in bad faith. The Panel specifically notes the following factors: (i) the Complainant is well-known; (ii) the Respondent failed to submit a response; (iii) the Respondent conceals its identity utilizing the Registrar's privacy service; and (iv) it is implausible that there would be any good faith use to which the disputed domain name may be put. Under the circumstances, the fact that the disputed domain name presently resolves to a parking website should not prevent a finding of a use in bad faith. The Panel finds that the disputed domain name has been used in 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 <carrefour-eu.net> be transferred to the Complainant.

/Keiji Kondo/
Keiji Kondo
Sole Panelist
Date: January 13, 2026