

ADMINISTRATIVE PANEL DECISION

JCDECAUX SE v. Domain Holdings Corporation
Case No. D2026-0054

1. The Parties

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

The Respondent is Domain Holdings Corporation, Cayman Islands, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <jcdecaux-australia.com> is registered with Amazon Registrar, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on January 8, 2026. On January 9, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 9, 2026, 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 (On behalf of jcdecaux-australia.com owner, Identity Protection Service) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 12, 2026, 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 January 12, 2026.

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 January 14, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 3, 2026. Informal email communications were received by the Center on January 14, 2026, and February 9, 2026, from non-Registrar confirmed email address.

The Center appointed Mihaela Maravela as the sole panelist in this matter on February 9, 2026. 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

According to information in the Complaint, the Complainant provides outdoor advertising since 1964. It offers solutions that combine urban development and the provision of public services in more than 80 countries. The Complainant currently provides its services in three principal segments of outdoor advertising market: street furniture, transport advertising and billboard advertising. The Complainant's group is listed on the Premier Marché of the Euronext Paris stock exchange and is part of Euronext 100 index.

The Complainant is the owner of several trademark registrations for JCDECAUX, including the International Trademark Registration No. 803987 registered on November 27, 2001, for goods and services in international classes 6, 9, 11, 19, 20, 35, 37, 38, 39, 41 and 42, duly renewed.

The Complainant has registered the domain name <jcdecaux.com> since June 23, 1997, which it uses as its official website.

The disputed domain name was registered on January 6, 2026 and according to evidence provided with the Complaint, it redirected to an unrelated Youtube video. At the date of this Decision, it resolves to a webpage displaying a "dangerous site" warning message.

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 confusingly similar to its trademark JCDECAUX, as the trademark is entirely included in the disputed domain name, and the addition of the country name "Australia" to the trademark is not sufficient to prevent the finding of confusing similarity.

As regards the second element, the Complainant argues that the Respondent has no rights or legitimate interests in respect of the disputed domain name and it is not related in any way with the Complainant. The Complainant does not carry out any activity for, nor has any business with, the Respondent. Neither license nor authorization has been granted to the Respondent to make any use of the Complainant's trademark JCDECAUX or apply for registration of the disputed domain name. Finally, the disputed domain name redirected to an unrelated Youtube video, therefore the Complainant contends that the Respondent used the dispute domain name in a way that fails to confer rights and legitimate interests, as it was used to promote unrelated services.

With respect to the third element, the Complainant submits that given the distinctiveness of the Complainant's trademarks and its reputation, it is inconceivable that the Respondent could have registered the disputed domain name without actual knowledge of the Complainant's rights in its trademark, which is evidence of bad faith. Finally, the disputed domain name redirected to an unrelated Youtube video, and in this respect the Complainant contends that the Respondent attempts to attract Internet users by creating a likelihood of confusion with the Complainant's trademark.

B. Respondent

The Respondent did not formally reply to the Complainant's contentions. In the informal emails sent to the Center, a third party claimed to have registered the disputed domain name for its client, and mentioned their client would be following up, and in a subsequent email communication it claimed that: "It looks like this domain was taken out of our account already so we cannot transfer it back to the client."

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to "decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable". Likewise, paragraph 10(d) of the Rules, provides that "the Panel shall determine the admissibility, relevance, materiality and weight of the evidence".

No formal response has been received from the Respondent in this case. Even if the Respondent has not replied to the Complainant's contentions, the Complainant still bears the burden of proving that all requirements are fulfilled. To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (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 applicable standard of proof in UDRP cases is the "balance of probabilities" or "preponderance of the evidence", and the Panel can draw certain inferences in light of the particular facts and circumstances of the case. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 4.2. Concerning the uncontested information provided by the Complainant, the Panel may, where relevant, accept the reasonable factual allegations in the Complaint as true. [WIPO Overview 3.0](#), section 4.3.

The Panel has taken note of the [WIPO Overview 3.0](#), and, where appropriate, will decide consistently with the consensus views stated therein.

A. Identical or Confusingly Similar

Under paragraph 4(a)(i) of the Policy, the Complainant must prove that it has rights to a trademark, and that the disputed domain name is identical or confusingly similar to that trademark. This first element under the Policy functions primarily as a standing requirement. [WIPO Overview 3.0](#), section 1.7.

The Complainant has shown rights in respect of the trademark JCDECAUX for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

As regards the second limb of the first element, the test for confusing similarity involves a reasoned but relatively straightforward comparison between the trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7. It has also long been held that generic Top-Level Domains are generally disregarded when evaluating the confusing similarity between a disputed domain name and a trademark. See section 1.11.1 of the [WIPO Overview 3.0](#).

The entirety of the mark is reproduced 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.

Although the addition of other terms (here, "australia" and a hyphen) may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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.

There is no evidence in the record that the Respondent is currently using the disputed domain name in connection with a bona fide offering of goods or services, nor does the Respondent appear to engage in any legitimate noncommercial or fair use of the disputed domain name within the meaning of paragraphs 4(c)(i) and (iii) of the Policy. Rather, it appears that by using the disputed domain name, the Respondent diverts Internet users to an unrelated YouTube video. Such use of the disputed domain name confusingly similar to the Complainant’s trademark cannot be considered a bona fide offering of goods or services nor a legitimate noncommercial or fair use of the disputed domain name. Currently the disputed domain name resolves to a warning “Dangerous site” page, which rather indicates that the disputed domain name may be used to perpetrate illegal activity and thus, does not favor a finding of any rights or legitimate interests on behalf of the Respondent.

Also, there is no evidence that the Respondent is commonly known by the disputed domain name within the meaning of paragraph 4(c)(ii) of the Policy.

The Respondent has not replied to the Complainant’s contentions, claiming any rights or legitimate interests in the disputed domain name.

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.

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.

According to the unrebutted assertions of the Complainant, it has used JCDECAUX as its trademark for many years. The disputed domain name is confusingly similar to the Complainant’s trademark. Under these circumstances, it is most likely that the Respondent was aware of the Complainant’s trademark at the

registration date of the disputed domain name. The Respondent provided no explanation for why it registered the disputed domain name. The redirection of the disputed domain name to a Youtube video unconnected to the Complainant, and is likely to unduly profit from the value of the Complainant's trademark.

Further, the Respondent has not provided a formal Response and has failed to rebut the Complainant's contentions or provide any evidence of actual or contemplated good-faith use. Also, the Respondent's bad faith registration and use of the disputed domain name can be inferred from the current warning on the website which the disputed domain name resolves to, stating: "Dangerous site. Attackers on the site that you tried visiting might trick you into installing software or revealing things like your passwords, phone or credit card numbers. Chrome strongly recommends going back to safety. Learn more about this warning."

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

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 <jcdecaux-australia.com> be transferred to the Complainant.

/Mihaela Maravela/

Mihaela Maravela

Sole Panelist

Date: February 16, 2026