

ADMINISTRATIVE PANEL DECISION

Les Grands Chais de France v. Name Redacted
Case No. D2026-0413

1. The Parties

The Complainant is Les Grands Chais de France, France, internally represented.

The Respondent is Name Redacted.¹

2. The Domain Name and Registrar

The disputed domain name <lgcf-fr.com> is registered with Wild West Domains, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 2, 2026. On February 3, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 3, 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 (Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 6, 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 February 9, 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”).

¹Respondent appears to have used the name of the Complainant’s employee when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted Respondent’s name from this decision. However, the Panel has attached as Annex 1 to this decision an instruction to the Registrar regarding transfer of the disputed domain name, which includes the name of Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v.FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on February 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 4, 2026. An email was received from the email address confirmed by the Registrar on February 9, 2026, stating that the named Respondent “did not register, own, control, or use” the disputed domain name and that its “personal contact details appear to have been used without authorization in the domain registration”.

The Center appointed Rebecca Slater as the sole panelist in this matter on March 18, 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

The Complainant is a French company founded in 1979. According to the Complainant, it is a leading wholesale wine and spirits merchant, operating in over 170 countries and employing over 3,500 people.

The letters “LGCF” refer to the initial of each word composing the Complainant’s company name. The Complainant uses “GCF” as the official acronym of its company name and uses “LGCF” as a commercial / trade name.

The Complainant holds trade mark registrations incorporating “GCF”, including European Union Registration No. 018736142 for GROUPE GCF figurative mark (registered July 22, 2022) and Chinese Registration No. 13870701 for GROUPE GCF figurative mark (registered January 8, 2024).

The Complainant operates a website at the domain name <groupegcf.com> (registered March 9, 2015) which displays historical information about the Complainant, its partners and wine houses. The Complainant is also the registrant of the domain names <lgcf.com> (registered November 15, 2000) and <lgcf.fr> (registered October 28, 2001).

The Respondent is an individual apparently located in Bahrain. The Respondent did not submit a formal response, and consequently little information is known about the Respondent.

The disputed domain name was registered on January 27, 2026. The disputed domain name does not resolve to an active website. The Complainant provided evidence showing that the disputed domain name was used to send emails impersonating the Complainant.

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 the Complainant’s registered trade marks and identifiers “GCF” and “LGCF”. The addition of the descriptive geographic element “-fr” does not dispel confusion, particularly given the Complainant’s location in France and its <lgcf.fr> domain name.
- The disputed domain name was used in a phishing scheme impersonating the Complainant, its President, and an employee. The Complainant’s clients were emailed fraudulent payment instructions. The disputed domain name resolved to an inactive page, but email servers were configured.

- The Respondent has no rights or legitimate interests in the disputed domain name. It has no affiliation with or authorization from the Complainant. There is no bona fide or non-commercial use, the disputed domain name resolves to an inactive site. The Respondent failed to respond to the Complainant's attempts at contact.
- The disputed domain name was registered and used in bad faith. The Respondent knew or should have known of the Complainant's rights (a simple search would have revealed them). The Respondent immediately used the disputed domain name to phish on the day of registration. The Respondent used a privacy service to conceal their identity.

B. Respondent

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

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all the elements enumerated in paragraph 4(a) of the Policy have been satisfied, namely:

- the disputed domain name is identical or confusingly similar to a trade mark or service mark in which the Complainant has rights;
- the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- the disputed domain name has been registered and is being used in bad faith.

The onus of proving these elements is on the Complainant.

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 trade mark and the disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the GROUPE GCF mark is recognizable within the disputed domain name. The Panel notes that the "GCF" component of the registered mark is the most prominent (and "GROUPE" is featured in much smaller text). Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition and absence of other terms (here, the addition of "l" and "-fr and the absence of "groupe") may bear on assessment of the second and third elements, the Panel finds the addition or absence of these terms does not prevent a finding of confusing similarity between the disputed domain name and the registered mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

For completeness, the Panel also finds that the Complainant has common law trade mark rights in GCF and LGCF and that the disputed domain name is substantially similar both marks. [WIPO Overview 3.1](#), section 1.3.

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 that 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 3.1](#), 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 authorized the Respondent to use its registered or unregistered trade marks and there is no evidence that the Respondent is commonly known by the disputed domain name.

The evidence provided by the Complainant (i.e., emails impersonating the Complainant’s President and an employee) indicates that the disputed domain name has been used to perpetrate a fraudulent scheme. Panels have held that the use of a domain name for illegitimate activity (here, claimed impersonation/passing off and phishing) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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 3.1](#), section 3.2.1.

Panels have held that the use of a domain name for illegitimate activity (here, claimed impersonation/passing off and phishing) constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. 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 <lgcf-fr.com> be transferred to the Complainant.

/Rebecca Slater/

Rebecca Slater

Sole Panelist

Date: March 25, 2026