

ADMINISTRATIVE PANEL DECISION

DASH TWO, INC. v. Mike Bouccara, Digital111
Case No. D2026-2292

1. The Parties

The Complainant is DASH TWO, INC., United States of America (“United States”), internally represented.

The Respondent is Mike Bouccara, Digital111, France, internally represented.

2. The Domain Name and Registrar

The disputed domain name <sauvage111wildposting.com> is registered with OVH (the “Registrar”).

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on May 28, 2026. On the same day, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 29, 2026, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

On May 29, 2026, the Center informed the parties in French and English, that the language of the registration agreement for the disputed domain name is French. On June 9, 2026, the Complainant confirmed its request that English be the language of the proceeding.

The Center verified that the 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, in French and English, and the proceedings commenced on June 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 1, 2026. The Response was filed in French with the Center on July 2, 2026. In the Response, the Respondent requested that French be the language of the proceeding. On July 2 and 3, 2026, the Center received email communications from the Parties regarding the late filing of the Response and the possibility of the Complainant making a supplemental filing. On July 8, 2026, the Complainant made an unsolicited supplemental filing in English.

The Center appointed Matthew Kennedy as the sole panelist in this matter on July 16, 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 California, United States corporation that operates an outdoor advertising business. It holds multiple trademark registrations, including the following:

- United States trademark registration number 5,432,087, for WILD POSTING, registered on March 27, 2018, claiming first use in commerce on March 20, 2017, for outdoor advertising in class 35, disclaiming POSTING;
- United States trademark registration number 5,432,094 for WILD POSTING in a rectangle, registered on March 27, 2018, claiming first use in commerce on March 20, 2017, for outdoor advertising in class 35, disclaiming POSTING;
- International trademark registration number 1739585 for WILD POSTING, registered on June 1, 2023, designating multiple jurisdictions, including France, specifying outdoor advertising in class 35, disclaiming POSTING;
- United States trademark registration number 7,437,862 for WILD POSTERS, registered on July 9, 2024, claiming first use in commerce on March 20, 2017, for preparing and placing outdoor advertisements for others in class 35, disclaiming POSTERS;
- United States trademark registration number 7,437,877 for WILD POSTINGS, registered on July 9, 2024, claiming first use in commerce on October 10, 2010, for preparing and placing outdoor advertisements for others in class 35, disclaiming POSTINGS; and
- United States trademark registration number 8,133,999 for WILDPOSTING, registered on February 10, 2026 (application filed June 24, 2025), claiming first use in commerce on October 10, 2010, for outdoor advertising in class 35.

The above trademark registrations were current at the time when the Complaint was filed. The Complainant now also holds United States trademark registration number 8,332,153 for WILDPOSTING.COM, registered on July 7, 2026 (application filed November 22, 2025 and pending when the Complaint was filed).

On August 4, 2023, a third party commenced a proceeding in the United States District Court for the District of Massachusetts, seeking a declaration of invalidity of trademark registrations numbers 5,432,087 and 5,432,094 for WILD POSTING and the then-pending trademark application for WILD POSTINGS, alleging that the trademarks were generic. The complainant in that proceeding filed a notice of voluntary dismissal the following month. See *ALT TERRAIN, LLC v. Dash Two, Inc.* (Case No. 3:23-cv-30080). Evidence submitted by the Respondent in this UDRP proceeding shows that that third party currently refers to “Wheatpaste Wild Posting” as a street-level advertising format.

On August 10, 2023, another third party filed a petition to cancel United States trademark registration number 5,432,087 for WILD POSTING, alleging inter alia that the trademark was generic and descriptive. The petition was withdrawn with prejudice on February 27, 2024 and in view thereof the cancellation proceeding was dismissed with prejudice on the following day. See USPTO Trademark and Trial Appeal Board (“TTAB”) proceeding number 92082987. Concurrently, the third party who filed the trademark cancellation petition submitted a Response to a UDRP complaint brought by the Complainant based on its WILD POSTING trademark, regarding the domain name <wildposting.me>. A panel denied the UDRP complaint on October 10, 2023, while the cancellation petition was pending before the TTAB. See *Dash Two Inc. v. James Rogers*, WIPO Case No. [DME2023-0007](#).

The Complainant has used the domain name <wildposting.com> in connection with a website in English since at least 2020 that prominently displays its WILD POSTING marks and provides information about itself and its services. The website currently displays a section headed “What is Wild Posting®?” that describes Wild Posting® as a street-level advertising method known generically as “flyposting”. “WILD POSTERS®” and “WILD POSTING®” are listed on its menu of services, as are 8-sheets, bus benches, mobile billboards, in-theater, and guerrilla advertising. According to archived screenshots presented by the Complainant, the mark was originally used without the ® symbol until sometime between June 2021 and September 2025. The Complainant covers many cities in North America, as well as London, United Kingdom, and Paris, France. Its contact details are in California, United States.

The Respondent is Mike Bouccara and his French company, founded as “Digital111” on October 1, 2016 and renamed “Sauvage111” on April 27, 2026. The Respondent operates an outdoor advertising business. The Respondent registered the domain name <sauvage111.com> on December 18, 2017 and uses it in connection with a website in French and English titled “SAUVAGE111®” and, above that, “Outdoor Creative Agency Media + Event”. Contact telephone numbers are shown for a head office in Paris as well as a United States (US) Division and a United Kingdom (UK) Division. The Complainant holds French trademark registration number 4754192 for SAUVAGE111, registered on October 15, 2021 (application filed April 12, 2021), for goods and services in classes 25, 35, and 38, including advertising. “Sauvage” is a French word meaning “wild”. The Respondent has also registered the domain names <sauvage111media.com> (on March 1, 2023), <sauvage111wildprojection.com> (on December 5, 2025 – the same date as the disputed domain name), and <sauvage111studio.com> (on June 11, 2026 – the date on which this proceeding commenced).

The disputed domain name was registered on December 5, 2025. It resolves to a website in English titled “SAUVAGE111®WILDPOSTING”. The title also appears at the bottom of the homepage. A button is labelled “ABOUT SAUVAGE111®WILDPOSTING”. The text claims that “Sauvage111® is the world leader in wild posting” and “Since day one, Sauvage111® has been the reference in wild posting”. The site lists “Five Steps to Launch a Wild Posting Campaign” and a button is labelled “PLAN MY WILDPOSTING CAMPAIGN”. Many cities in Europe are covered, as well as five cities in the United States. Clients include various global brands.

The Complainant sent an intellectual property takedown notice to the hosting provider for the website associated with the disputed domain name. The Respondent filed a counter-notice, alleging that “wildposting” was a generic, descriptive, industry term. The counter-notice was forwarded to the Complainant on or about May 22, 2026. The website remains live.

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 it does business as “Wild Posting” and has continuously used the WILD POSTING and WILDPOSTING marks in commerce since at least as early as 2010-2017, depending on the specific mark. The disputed domain name is confusingly similar to the WILDPOSTING and WILD POSTING marks.

The Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent’s own conduct forecloses a defense that his use of the disputed domain name is in connection with a bona fide offering of goods or services, because (i) his own typography concedes that WILDPOSTING is not his mark, as it applies the ® symbol to SAUVAGE111 only; and (ii) the Respondent operates a fully-functioning bona fide brand presence at his corporate website without using the Complainant’s WILDPOSTING mark at all. The Respondent is commonly known by “Sauvage111”, not the disputed

domain name. The website associated with the disputed domain name is fully commercial. The Respondent does not use “wildposting” descriptively but, rather, as a brand element in the homepage headline. If “wildposting” were genuinely generic, there would be no reason to elevate it to a primary headline term and pair it with the Respondent’s own brand. United States federal trademark registration is presumptive evidence that the WILDPOSTING mark is inherently distinctive (or has acquired distinctiveness), is not generic, and is entitled to protection. A cancellation petition filed by a third party against the WILD POSTING mark based on genericness, among other grounds, was withdrawn and dismissed with prejudice in 2024.

The disputed domain name has been registered and is being used in bad faith. The Respondent operates in the same industry as the Complainant and, combined with the substantial public record of the Complainant’s prior use, this gives rise to a strong inference of actual knowledge at the time of registration of the disputed domain name. The Respondent’s homepage typography is direct evidence of its knowledge that WILDPOSTING is a separate mark belonging to a third party. The Respondent has had a fully bona fide corporate website at his own brand name since 2017. It does not need the Complainant’s WILDPOSTING mark to identify its business or to operate its commercial activities. The only rational reading is that the disputed domain name was registered to capture traffic from Internet users searching for, or recognizing, the WILDPOSTING marks, and to suggest affiliation, endorsement, or sponsorship by the Complainant. The Respondent operates in the same markets as the Complainant, identifying a “US Division” on its website and listing five US cities among its service markets. The Respondent’s deployment of the ® symbol in US commerce for a mark that is not registered with the USPTO is itself a misrepresentation of trademark status.

This case is fundamentally different from the Complainant’s prior UDRP case regarding the domain name <wildposting.me>. See *Dash Two Inc. v. James Rogers, supra*. The respondent in that prior case credibly asserted decades of independent prior use of “wild posting” as a generic term, whereas the Respondent in the present case is a foreign competitor operating his own bona fide brand presence, who did not need the Complainant’s mark to identify his own business but chose to combine it with his mark in a composite domain name. The Panel in the prior case could not conclude that the respondent did not have the WILD POSTING mark in mind at the time of domain name registration whereas the Respondent in the present case admitted to the hosting provider that he was aware of the WILDPOSTING industry context and of the Complainant’s claim to the marks. The mark at issue in the prior case was only WILD POSTING, with a disclaimer, whereas the present Complaint principally addresses WILDPOSTING. The validity question that the prior panel deferred has since been resolved by dismissal of the cancellation proceeding with prejudice, and four additional registrations in the WILDPOSTING family.

In its supplemental filing, the Complainant submits that (1) of the six domain names that the Respondent invokes to establish a “coherent brand architecture” developed organically over years, only two predate the registration of the disputed domain name. The pattern is retroactive construction of a defense narrative; (2) the Respondent cites eight third parties said to use the term “wild posting” in a manner demonstrating that the term is generic but, of these, one notes the term’s trademark status; one applied for a declaration of non-infringement and abandoned its application with prejudice; three are editorial or analytical publications, not trademark-using competitors; one does not operate in the United States; and the remaining agencies use “wild posting” as a service description alongside their own distinct brand names, whereas the headline on the Respondent’s website is in brand-format; (3) the TTAB cancellation proceeding was dismissed with prejudice, which is a substantial final disposition; (4) the Respondent’s reliance on its other domain name registrations confirms that Digital111 and Sauvage111 are both the Respondent; (5) the Complainant holds an International trademark registration for WILD POSTING, designating France, which charges the Respondent with constructive notice of that mark; and (6) the Complainant’s United States trademark registration for WILDPOSTING.COM was registered after the Complaint was filed.

B. Respondent

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name.

The Respondent submits that it has been engaged in outdoor advertising since 2018. It has no establishment in the United States and only operates in that country through local independent partners. The Respondent has created a family of domain names according to a coherent brand architecture that combines its own SAUVAGE111 mark with each type of service that it offers, one for its institutional site and others for an out-of-home/digital out-of-home site, a wall projection site, a wild posting site and, soon, an events site and a photo and film production studio site. The disputed domain name fits in this purely descriptive and organizational structure. "Wild posting" (in French, "affichage sauvage") is a generic and descriptive term that refers, in the common parlance of outdoor advertising, to the technique of pasting paper posters in urban areas. The Complainant's United States trademark registrations disclaim the words "posting", "postings", and "posters", thereby acknowledging the non-distinctive and purely descriptive nature of these terms, as confirmed by the Complainant's own evidence, in which "wild posting" is used as a term of trade.

The Respondent does not contest that the Complainant holds trademark registrations and that the term "wildposting" appears in the disputed domain name. However, this does not prejudice the second and third elements of the Policy.

The Respondent has rights and legitimate interests in respect of the disputed domain name: (1) it has used the disputed domain name in connection with a bona fide offering of "wild posting" services since 2018. The associated website accurately describes this service; (2) the Respondent is commonly known as "SAUVAGE111", which is its company name and trade identity used publicly since 2018, its French registered trademark, and the domain name for its institutional site since 2017. The disputed domain name is simply a variation of this identity; (3) the disputed domain name makes a fair and descriptive use of a generic term, as "wild posting" is used to designate the service of wild posting, and not to refer to the Complainant; and (4) the Respondent's domain names are organized by type of service, all built on the SAUVAGE111 brand, which demonstrates a good faith logic, not appropriation of another party's brand.

The disputed domain name was not registered, and is not being used, in bad faith. The Respondent has never approached the Complainant; rather, it uses the disputed domain name for its own business. The Respondent has no history of cybersquatting but bases its domain names exclusively on its own brand. The Respondent is not the Complainant's direct competitor as it has no establishment in the United States. The Respondent's website prominently and permanently displays the SAUVAGE111 trademark, and clearly identifies the Respondent's agency, offices, and credentials. No Internet user could reasonably believe that the website originates from, or is affiliated with, the Complainant. Knowledge that the generic industry term "wild posting" is used in the outdoor advertising sector is in no way equivalent to knowledge of, or targeting of, the Complainant's brand. Dozens of operators use this term. The Respondent has adopted the term for its descriptive meaning, preceded in the disputed domain name by its own brand, and not to refer to the Complainant. The expression "wild posting" (or its compound form "wildposting") is used by dozens of players in the outdoor advertising market - including direct competitors of the Complainant in the United States - to describe exactly the same service. This widespread, long-standing, and prior use establishes that (1) "wild posting" is a generic term in the industry, which no one can claim as their exclusive right; and (2) the Complainant is not taking any action against these numerous other actors using the same term for the same service. The Respondent cannot be treated differently. This confirms the absence of any specific targeting of the Complainant and, therefore, the absence of bad faith.

6. Discussion and Findings

6.1 Procedural Issues

A. Late Filing of the Response

The Response was filed on the day after the due date, prior to the appointment of the Panel. The Respondent asks the Panel to excuse the slight delay, which it attributes to the need to translate the annexes to the Complaint submitted in English before it could prepare the Response.

The Complainant does not object to admission of the late Response.

The Panel has discretion to admit a late Response as part of its general powers under paragraph 10 of the Rules (a) to conduct the administrative proceeding in such a manner as it considers appropriate in accordance with the Policy and Rules; (b) to ensure that each Party is given a fair opportunity to present its case; and (c) to ensure that the administrative proceeding takes place with due expedition.

In the present case, the Panel notes that the delay in filing the Response was minimal and that admitting it will not cause unfairness to either Party. Therefore, the Panel decides to exercise its discretion to admit the Response as part of the record of this proceeding.

B. Complainant's Unsolicited Supplemental Filing

The Complainant made an unsolicited supplemental filing after receipt of the Response and prior to the appointment of the Panel. It alleges that the scope of this filing is strictly limited to the rebuttal of specific new factual claims and evidentiary exhibits introduced in the Response that the Complainant could not reasonably have anticipated, including the "coherent brand architecture" defense; the Respondent's specific list of eight third-party agencies said to demonstrate generic use of "wild posting", which the Complainant could not have anticipated because Complainant could not know which particular third parties the Respondent would name; the characterization of the outcome of the trademark cancellation proceeding; the Respondent's identity; the Respondent's contention that it had no notice of the Complainant's mark in France; and an intervening event trademark registration.

The Respondent submits that a supplementary filing is not justified. None of the points raised constitute new facts. The generic nature of the expression "wild posting", its use by third parties in the sector, the scope of the trademarks, and the cancellation proceeding could and should have been anticipated in the Complaint. The supplemental filing aims to introduce, for the first time, an International registration that should have been included in the Complaint. It thus amounts to an acknowledgement that the Complaint does not fully establish the Complainant's case. In the alternative, if the Panel deems it necessary to admit a supplementary filing, the Respondent submits that it should be strictly confined to new facts, and the Respondent should be granted an equivalent period of time to file a reply.

Paragraph 10(d) of the Rules provides that "[t]he Panel shall determine the admissibility, relevance, materiality and weight of the evidence". Although paragraph 12 of the Rules empowers the Panel, in its sole discretion, to request further statements or documents from either of the Parties, this does not preclude the Panel from accepting unsolicited filings. See *Delikomat Betriebsverpflegung Gesellschaft m.b.H. v. Alexander Lehner*, WIPO Case No. [D2001-1447](#).

The Panel observes that the Complainant's supplemental filing addresses detailed factual evidence in the Response that could not have been specifically anticipated in the Complaint. Given the Panel's findings below, accepting the supplemental filing will not cause unfairness to the Respondent, and it is unnecessary to give the Respondent an opportunity to reply. The supplemental filing was made before the appointment of the Panel and accepting it will not unduly delay this proceeding.

Therefore, the Panel exercises its discretion to admit the Complainant's supplemental filing and will take it into consideration in this decision according to its relevance, materiality and weight.

C. Language of the Proceeding

The language of the Registration Agreement for the disputed domain name is French. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint and amended Complaint were filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including that the Respondent operates in English, its counter-notice to the hosting provider was in English, the website associated with the disputed domain name is in English and offers services in the United States, the Respondent's primary corporate website has an English version and a contact for a US division, while the Complainant's evidence is in English, and translation would impose a disproportionate burden on the Complainant and serve no fairness purpose.

The Response was filed in French. The Respondent requested that the language of the proceeding be French for several reasons, including that the Registration Agreement is in French, the Respondent is a French national and a French company, conducting the procedure in French causes no unfairness to the Complainant who has assistance and the means to translate the evidence, whereas imposing English on the Respondent, who lacks representation, would create a burden and unjustified cost.

It is clear from the Response that the Respondent has fully understood the amended Complaint and taken the opportunity to defend itself. It is also clear from the supplemental filing that the Complainant has fully understood the Response. Moreover, the Panel notes that both Parties' arguments address the meaning of the disputed domain name in the English language.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs. See WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.5.1.

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English, but that the Panel will accept all documents as filed in the original version, whether French or English, without translation.

6.2 Substantive Issues

Paragraph 4(a) of the Policy provides that the Complainant must prove each of the following elements:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (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 burden of proof of each element is borne by the Complainant. Failure to prove any one element will result in denial of the Complaint.

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. See [WIPO Overview 3.1](#), section 1.7.

The Complainant has shown rights in respect of a WILD POSTING trademark and a WILDPOSTING trademark, among others, for the purposes of the Policy. It held rights in those trademarks at the time when it filed the Complaint, which is sufficient for the first element of the Policy. See [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the WILD POSTING mark (as two words) and the WILDPOSTING mark (as a single term) are reproduced within the disputed domain name, with the exception of the space between the words in the first mark, which cannot be incorporated in a domain name for technical reasons. Although the trademark registration of WILD POSTING (as two words) disclaims the right to exclusive use of POSTING, that does not prevent a finding of confusing similarity, particularly since POSTING is used in the disputed domain name with the non-disclaimed term WILD as shown in the mark. Further, despite the addition of the Respondent's SAUVAGE111 trademark as the initial element, the Complainant's marks remain clearly recognizable within the disputed domain name. The only other element in the disputed domain name is a generic Top-Level Domain ("gTLD") extension (".com") which, as a standard requirement of domain name registration, may be disregarded in the assessment of confusing similarity for the purposes of the Policy. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. See [WIPO Overview 3.1](#), sections 1.2.3, 1.7, 1.8, 1.10, and 1.11.1.

Therefore, the Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy sets out the following circumstances which, without limitation, if found by the Panel, shall demonstrate that the Respondent has rights to, or legitimate interests in, a disputed domain name, for the purposes of paragraph 4(a)(ii) of the Policy:

- (i) before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
- (ii) [the Respondent] (as an individual, business, or other organization) [has] been commonly known by the [disputed] domain name, even if [the Respondent has] acquired no trademark or service mark rights; or
- (iii) [the Respondent is] making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

In the present case, the disputed domain name combines SAUVAGE111, which is the Respondent's registered trademark, and WILDPOSTING, which is the Complainant's registered trademark. The Parties disagree as to whether "wildposting" also has an established meaning within their industry and, if so, whether the Respondent is using it in that sense in the disputed domain name, without intending to capitalize on the reputation and goodwill inherent in the Complainant's mark.

There is considerable evidence on the record that, in the outdoor advertising industry, "wildposting" (or "wild posting" as two words) describes a method of street-level advertising. Several advertising agencies operating in English describe "wildposting" as a service that they offer, one describing it as a form of guerrilla marketing, while another claims to be the "original" wildposting agency. An international media buying agency defines "wildposting" as an out-of-home media buying format and has produced a risk management guide titled "Wild Posting – How not to get sued". A printer has published a guide titled "How to Run Successful Wild Posting Ads". The Complainant asks the Panel to disregard several of these instances because these other parties do not incorporate "wildposting" in their brands, but the Complainant nonetheless appears to acknowledge that they use "wild posting" as a service description, whether of their own services or those of other parties.

The evidence on record shows that the Respondent is using the term "wildposting" consistently with this descriptive sense. The website associated with the disputed domain name offers street-level advertising of the type that "wildposting" describes in the outdoor advertising industry. The website content uses the term independently. The website title combines the term with the Respondent's mark as follows: "SAUVAGE111®WILDPOSTING". The placement of the ® symbol is an acknowledgement that the

Respondent has no registered trademark rights in the term that follows, but that is not an acknowledgement that “wildposting” is a trademark of another party. The Complainant argues that the Respondent already has a corporate website associated with its SAUVAGE111 mark and that it does not need the Complainant’s mark to identify its business. However, in the circumstances of this case, the website title, like the disputed domain name, appears to be intended as an extension of the Respondent’s branding to identify a service that it provides. That reading finds confirmation in the fact that, two years prior, the Respondent registered the domain name <sauvage111media.com> in the same [mark+descriptor] format and uses it in connection with a website in the same way.

The Panel has considered the possibility that the disputed domain name combines the Respondent’s own trademark with “wildposting” as a pretext to create an impression of affiliation with the Complainant. Both Parties offer outdoor advertising services and, although the Respondent is based in France and the Complainant is based in the United States, there appears to be some overlap between the cities that they cover. Yet the Complainant provides little evidence of the reputation of its mark beyond its own website, an industry news site contribution, and a New York digital magazine article. Nor is it alleged that the Respondent’s website content imitates that of the Complainant’s website. In these circumstances, the Panel is unable to conclude that the apparently descriptive use of the term “wildposting” is merely pretextual.

Accordingly, the Complainant has failed to demonstrate, on the balance of probabilities, that the Respondent has not been using the disputed domain name in connection with a bona fide offering of services within the terms of paragraph 4(c)(i) of the Policy.

Based on the record, the Panel finds the second element of the Policy has not been established.

C. Registered and Used in Bad Faith

Given the Panel’s findings under the second element of the Policy, it is unnecessary to consider the third element.

The Panel notes that nothing in this Decision prevents either Party from submitting this dispute to a court of competent jurisdiction for independent resolution in accordance with paragraph 4(k) of the Policy.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Matthew Kennedy/

Matthew Kennedy

Sole Panelist

Date: July 28, 2026