

ADMINISTRATIVE PANEL DECISION

Valeo v. annie Macedo, LuxairGroup
Case No. D2026-2432

1. The Parties

The Complainant is Valeo, France, represented by Tmark Conseils, France.

The Respondent is annie Macedo, LuxairGroup, Bulgaria.

2. The Domain Name and Registrar

The disputed domain name <va1eo.com> is registered with Hostinger Operations, UAB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 4, 2026. On June 5, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 8, 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 (Unknown / The RDAP server redacted the value) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 9, 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 June 11, 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 June 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 2, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 6, 2026.

The Center appointed Áron László as the sole panelist in this matter on July 14, 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 Valeo, a European company registered in France since February 25, 1955. The Complainant is a worldwide automotive supplier and technology company that designs innovative solutions for smart mobility. The Complainant also provides and distributes spare parts for carmakers and independent aftermarket operators. The Complainant has used the mark VALEO in connection with automotive and mobility activities and goods since 1980.

The Complainant is the owner of numerous registered trademarks for VALEO worldwide. The Complainant relies, inter alia, on the following trademark registrations:

- United States of America trademark VALEO, Registration No. 1353733, registered on August 13, 1985;
- French trademark VALEO, Registration No. 1336046, registered on December 23, 1985; and
- European Union trademark VALEO, Registration No. 005758412 (figurative), registered on July 2, 2007.

The Complainant operates the domain name <valeo.com>, created on March 25, 1997, which directs to the Complainant's official website.

The disputed domain name <va1eo.com> was registered on April 23, 2026. The disputed domain name does not resolve to an active website. Mail Exchange ("MX") records were configured in relation to the disputed domain name.

According to the Registrar's verification response, the Respondent is "annie Macedo", with the organisation listed as "LuxairGroup", located in Bulgaria.

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.

The Complainant contends that the disputed domain name <va1eo.com> is identical or, at the very least, confusingly similar to the VALEO trademark. The Complainant argues that the disputed domain name wholly incorporates and imitates its earlier well-known, and famous trademark. The Complainant notes that the only modification in the disputed domain name consists of the substitution of the letter "l" with the numeral "1" between the letters "a" and "e", which qualifies as typosquatting. The Complainant relies on prior UDRP panel decisions which have found that such substitutions of visually similar characters amount to typosquatting.

The Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. VALEO is not a generic term but a registered, distinctive, and well-known trademark, and the Complainant's prior rights significantly predate the registration of the disputed domain name. At the time of registration of the disputed domain name, the Respondent was not known as "valeo" and there is no legitimate reason why the Respondent would incorporate the Complainant's well-known trademark in the

disputed domain name. The disputed domain name does not resolve to any active website, which does not give a legitimate reason for the Respondent to have reserved the disputed domain name, and that the Respondent offers no evidence of a bona fide offer of goods or services.

The Complainant contends that the disputed domain name was registered and is being used in bad faith. The Complainant asserts that, given the decades-long and worldwide protection and use of the VALEO denomination as a trademark, company name, and domain name, it is inconceivable that the Respondent registered the disputed domain name by coincidence. The Complainant submits that the substitution of the letter “l” with the numeral “1” in the word “valeo” is a common and deliberate practice of typosquatting intended to intercept and divert Internet users who mistype “valeo” when attempting to access the Complainant’s official website. The Complainant contends that the numeral “1” was specifically chosen because of its visual resemblance to the lowercase letter “l”, and that this deliberate misspelling is itself evidence of bad faith at the time of registration. The Complainant further contends that, although the disputed domain name does not currently resolve to any active website, passive holding does not preclude a finding of bad faith. The Complainant additionally draws attention to the configuration of MX servers on the disputed domain name, contending that this constitutes evidence of an intention to conduct phishing or scamming activities impersonating the Complainant. It further submits that the risk of confusion between the Complainant’s genuine email addresses and fraudulent addresses based on the disputed domain name is high, given that both share the same email address architecture. The Complainant draws the Panel’s attention to the prior UDRP proceeding, *Rocsys B. V. v. annie Macedo, LuxairGroup*, WIPO Case No. [D2023-4824](#), in which the same Respondent was found to have registered a domain name reproducing a complainant’s trademark with the same registrar and to have used it for fraudulent email purposes, resulting in an order to transfer the domain name.

B. Respondent

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

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 in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable”.

Paragraph 4(a) of the Policy requires that a complainant must prove each of the following three elements to obtain an order that a domain name should be cancelled or transferred:

- i.the domain name registered by the respondent 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 domain name; and
- iii.the domain name has been registered and is being used in bad faith.

In view of the Respondents’ failure to submit a Response, the Panel shall decide this dispute on the basis of the Complainant’s undisputed representations pursuant to paragraphs 5(f), 14(a) and 15(a) of the Rules and draw such inferences as it considers appropriate pursuant to paragraph 14(b) of the Rules.

The Panel is entitled to accept all reasonable allegations set forth in a complaint. However, the Panel may deny relief where a complaint contains mere conclusory or unsubstantiated arguments. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.3.

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 3.1](#), section 1.7.

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

The Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

A domain name which consists of a variation of a trademark (typically a common, obvious, or intentional misspelling, referred to as typosquatting) is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. Examples of such variations include substitution of similar-appearing characters (e.g., upper vs lower-case letters or numbers used to look like letters). [WIPO Overview 3.1](#), section 1.9.

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 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.

The Panel does not consider that bad faith has been established simply because the Respondent has configured MX servers using the disputed domain name.

On the other hand, the Panel considers that the Respondent deliberately chose the disputed domain name due to its resemblance to the Complainant's well-known trademark, given that the numeral "1" resembles the letter "l". Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a well-known trademark, and particularly in the case of coined or fanciful marks, can by itself create a presumption of bad faith. The Panel concludes on the balance of probabilities that the Respondent registered the disputed domain name with prior knowledge of the Complainant's trademark and with the intent to target it.

Panels have found that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness or reputation of the Complainant's trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of 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 <va1eo.com> be transferred to the Complainant.

/Áron László/

Áron László

Sole Panelist

Date: July 28, 2026