

ADMINISTRATIVE PANEL DECISION

Association des Centres Distributeurs E. Leclerc – A.C.D. Lec v. Joe Moore
Case No. DCO2025-0070

1. The Parties

The Complainant is Association des Centres Distributeurs E. Leclerc – A.C.D. Lec, France, represented by MIIP MADE IN IP, France.

The Respondent is Joe Moore, United States of America.

2. The Domain Name and Registrar

The disputed domain name <leclrec.co> (the “Domain Name”) is registered with PDR Ltd. d/b/a PublicDomainRegistry.com (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 26, 2025. On August 27, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On August 28, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 28, 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 August 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 September 1, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 21, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 22, 2025.

The Center appointed Ian Lowe as the sole panelist in this matter on September 25, 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 is Association des Centres Distributeurs E. Leclerc – A.C.D. Lec, a French association operating chains of supermarkets and hypermarkets in France. The name “Leclerc” refers to the founder and promoter of the association, Mr. Edouard Leclerc. The Complainant has approximately 750 stores in France and around 100 stores in other European countries including Luxembourg, Poland, Portugal, Slovenia, and Spain. With more than 24% of the grocery market share in France as of July 2024, the Complainant is one of the leaders of large-scale distribution in France, with a turnover of EUR 60 billion in 2023 and employing over 140,000 people.

The Complainant is the proprietor of registered trademarks for LECLERC, including European Union trademark number 002700656 registered on February 26, 2004, and France trademark number 1307790 registered since May 2, 1985.

The Domain Name was registered on November 15, 2024. The Domain Name appears to resolve to an inactive page, but the Complainant has provided evidence that it is being used for fraudulent purposes, specifically automatically downloading a suspicious file (.gzip file encapsulated in an http response) into visitors’ browser caches for data exfiltration purposes. The Complainant’s representative’s cybersecurity provider detected such suspicious activity on June 16, 2025, when a collaborator from the Complainant’s representative’s firm visited the associated page.

The Complainant sent a letter to the Respondent through the Registrar on February 25, 2025, seeking information about the Respondent’s intention of registration of the Domain Name, but received no response from the Respondent.

5. Parties’ Contentions

A. Complainant

The Complainant contends that the Domain Name is confusingly similar to its LECLERC trademark, that the Respondent has no rights or legitimate interests in respect of the Domain Name, and that the Respondent registered and is using the Domain Name in bad faith.

The Complainant argues that the Domain Name constitutes typosquatting through the inversion of the 5th and 6th letters in LECLERC, creating “leclrec”. The Complainant points to prior UDRP decisions involving similar typosquatting variants of the LECLERC mark, such as *Association des Centres Distributeurs E. Leclerc - ACD Lec, v. W S, WIS INC*, WIPO Case No. [D2023-2315](#) (transfer of the domain name <leclrec.com>).

The Complainant provides evidence of fraudulent use, specifically that the Domain Name automatically downloads malicious files for data exfiltration purposes when visited the website at the Domain Name. The Complainant’s cybersecurity provider documented this suspicious activity through technical analysis.

B. Respondent

The Respondent did not reply to the Complainant’s contentions

6. Discussion and Findings

For this Complaint to succeed in relation to the Domain Name the Complainant must prove that:

(i) the 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 Domain Name; and
- (iii) the Domain Name has been registered and is being used in bad faith.

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 of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark for the purposes of the Policy through its registered trademarks for LECLERC in multiple jurisdictions. [WIPO Overview 3.0](#), section 1.2.1.

Ignoring the country code Top-Level Domain ".co", the Domain Name comprises "leclrec" which incorporates the entirety of the Complainant's LECLERC trademark save for the transposition of the 5th and 6th letters, reversing "er" to "re". The Panel finds that this minor variation does not prevent a finding of confusing similarity between the Domain Name and the trademark.

The Domain Name is a classic example of typosquatting through letter transposition. As panels have consistently recognized, "a domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element." [WIPO Overview 3.0](#), section 1.9.

Accordingly, the Panel finds that the Domain Name is confusingly similar to a trademark in which the Complainant has rights, and 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. Accordingly, 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 Complainant has made out a prima facie case that the Respondent lacks rights or legitimate interests in the Domain Name. The Respondent is not authorized by the Complainant to use its trademark, is not commonly known by LECLERC or any variation thereof, and there is no evidence of any trademark rights in related terms.

The Complainant has provided evidence that the Domain Name is being used for fraudulent purposes, specifically to automatically download suspicious files for data exfiltration when visitors access the associated page at the Domain Name. The Complainant's cybersecurity provider documented this malicious activity through technical analysis. Such use cannot constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use. Panels have held that the use of a domain name for illegal activity such as malware distribution can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

In the circumstances, the Panel finds that the Respondent does not have any rights or legitimate interests in respect of the 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.

The Complainant's LECLERC trademark is distinctive and well known, particularly in France where the Complainant is one of the market leaders in large-scale distribution with over 24% market share as of July 2024. The Complainant's reputation has been recognized in numerous prior UDRP decisions. Given this widespread recognition, it is more likely than not that the Respondent was aware of the Complainant and its rights in the LECLERC mark when registering the Domain Name.

The typosquatting nature of the Domain Name — incorporating a deliberate misspelling through letter transposition — demonstrates that the Respondent had the Complainant's mark specifically in mind when registering the Domain Name. Panels have consistently found that the mere registration of a domain name that is confusingly similar (particularly domain names comprising typos) to a widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith for the purposes of the Policy.

[WIPO Overview 3.0](#), section 3.1.4.

The Complainant has provided credible evidence of the fraudulent use of the Domain Name for malware distribution and data exfiltration purposes. The technical analysis from the Complainant's cybersecurity provider documents that visiting the Domain Name triggers automatic download of suspicious files designed for data exfiltration. Such use constitutes illegal activity and manifestly establishes bad faith use.

[WIPO Overview 3.0](#), section 3.4.

The use of the Domain Name for such malicious purposes targeting users who may believe they are accessing a legitimate LECLERC-related website as they may not notice the subtle difference between the Domain Name and the Complainant's mark demonstrates the Respondent's intention to exploit the Complainant's reputation potentially for its own benefit. Furthermore, such use disrupts the Complainant's business and causes harm to its reputation, as Internet users may believe the Complainant's website has been compromised or is not functioning properly.

Accordingly, the Panel finds that the Domain Name has been registered and is being used in bad faith, and the third element of the Policy has been established.

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 <leclrec.co> be transferred to the Complainant.

/Ian Lowe/

Ian Lowe

Sole Panelist

Date: October 9, 2025