

Decision for dispute CAC-UDRP-108969

Case number	CAC-UDRP-108969
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Time of filing	2026-08-31 08:56:52
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Domain names	jcdsecaux.com
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Case administrator

Organization	Iveta Špiclová (Czech Arbitration Court) (Case admin)
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Complainant

Organization	JCDECAUX SE
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Complainant representative

Organization	NAMESHIELD S.A.S.
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Respondent

Organization	Simplify Technology
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OTHER LEGAL PROCEEDINGS

The Panel is not aware of any other legal proceedings which are pending or decided and relate to the disputed domain name.

IDENTIFICATION OF RIGHTS

The Complainant has adduced evidence showing that it is the owner of International Trademark No. 803987 in respect of the mark JCDecaux, registered on 27 November 2001 in Nice Classification classes 06, 09, 11, 19, 20, 35, 37, 38, 39, 41 and 42. The international registration was based on an original French registration.

The Complainant also adduced evidence to show it is the registrant of the domain name <jcdecaux.com>, registered on 23 June 1997.

Further trademarks and domain names are alluded to in the Complaint but these are not supported by evidence.

The Respondent registered the disputed domain name <jcdsecaux.com> on 26 August 2026 according to the Registrar Verification details obtained by the CAC Case Administrator.

FACTUAL BACKGROUND

At the age of sixteen, Jean-Claude Decaux started putting up posters in Beauvais, France, to promote his parents' shop and then other local businesses. He set up his first company three years later (which at the time required special authorization in view of his age). Against a background of heavy taxation on roadside advertising, his company in 1964 pioneered the provision of an alternative

method, namely, the provision of bus shelters incorporating advertising panels, a first instance of advertising street furniture. JCDecaux SE, the Complainant group, is today incorporated as a European company (Société Européenne), with governing organs situated in France, and is the foremost provider worldwide of outdoor/out-of-home advertising. It remains known for innovation and for its relations with advertisers, local authorities and other entities that sustain the Complainant's unique market position. JCDECAUX currently provides over a million advertising panels at airports, in rail and metro stations, in shopping malls, and on billboards and street furniture, with digital means increasingly transforming its means of delivery. JCDecaux is listed on the Euronext Paris stock exchange and figures in the Euronext 100 index. It employs a workforce of nearly 12,000, operates in 79 countries and had a turnover approaching €4 billion in 2025.

According to the Registrar Verification in this case, the Respondent gave details at registration of the disputed domain name stating the Respondent's name and business name at a street address in Riverview, Florida, United States. A cursory check of these details by the Panel during its scrutiny of the Case File revealed that, while the address is genuine, there is no such individual or business at the address the Respondent provided.

As to the disputed domain name, screenshot evidence submitted by the Complainant shows that it does not resolve to any hosted server address; there is consequently nothing resembling a website associated with the disputed domain name.

On the other hand, the Complainant adduced evidence in the form of the text of an e-mail sent from a mail server that resolves to the disputed domain name. The e-mail is written in Bulgarian to a Bulgarian client of the Complainant and purports to be sent by one of the Complainant's employees. The e-mail includes the address details for the Complainant's Sofia office and spells the Complainant's name correctly. The sender claims in the text that the Complainant's bank account has been compromised and asks the recipient to pay an attached invoice to a supposed new bank account and to update the recipient's records for payment of further invoices.

PARTIES CONTENTIONS

COMPLAINANT:

A. The disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights

The Complainant observes that the disputed domain name <jcdsecaux.com> is confusingly similar to its trademark JCDECAUX by reason of an obvious misspelling of the Complainant's trademark (i.e., the addition of the letter "s"). Inclusion of such a misspelling is characteristic of the practice of typosquatting, which aims to create confusing similarity between a trademark and a domain name that the typosquatter has registered. Addition of the extension <.com> does not change the overall impression of the designation being connected to the Complainant's trademark and so does not reduce the likelihood of confusion between the disputed domain name and the Complainant, its trademark and its own domain name or names.

B. The Respondent has no rights or legitimate interests in respect of the disputed domain name

The Complainant asserts that the Respondent is not identified in the WHOIS database as the disputed domain name.

The Complainant affirms that the Respondent is not in any way related to it or authorized by it to use its JCDECAUX trademark or corporate name. Rather, the Complainant contends that the Respondent has no rights or legitimate interest in respect of the disputed domain name, including as regards registration of the disputed domain name.

Furthermore, registering the disputed domain name to attempt to take advantage of internet users' misreading it for the Complainant's trademark or corporate name in it evidences the Respondent's lack of rights and any legitimate interest in the domain name. Indeed, the disputed domain name has been shown in evidence submitted to the Panel to have been used in a phishing scheme. More precisely, the Respondent has used the disputed domain name to pass itself off as one of the Complainant's employees to obtain undue payment from one of the Complainant's clients. Using the disputed domain name in this manner is neither a bona fide offering of goods or services under Paragraph 4 (c)(i) of the UDRP; nor a non-commercial or fair use under Paragraph 4(c)(iii).

C. The disputed domain name was registered and is being used in bad faith

The disputed domain name is identical to the Complainant's trademark JCDECAUX but for the deliberate typographical insertion of one additional letter. The Complainant asserts that its trademark JCDECAUX has been already widely known for decades and was protected in several countries at the time of the registration. Given the distinctiveness of the Complainant's trademark and its reputation, one can safely conclude that the Respondent registered the disputed domain name with full knowledge of the Complainant's trademark JCDECAUX and thus in bad faith, while the above-mentioned evidence of phishing solidly demonstrates the Respondent's bad faith use.

RESPONDENT:

No administratively compliant Response has been filed.

RIGHTS

The Complainant has, to the satisfaction of the Panel, shown that the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy).

NO RIGHTS OR LEGITIMATE INTERESTS

The Complainant has, to the satisfaction of the Panel, shown the Respondent to have no rights or legitimate interest in respect of the disputed domain name (within the meaning of paragraph 4(a)(ii) of the Policy).

BAD FAITH

The Complainant has, to the satisfaction of the Panel, shown that the disputed domain name was registered and is being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy).

PROCEDURAL FACTORS

The Panel is satisfied that all procedural requirements under the UDRP were met and that there is no other reason why it would be inappropriate to provide a decision.

The Panel notes that its résumé of the Parties' contentions includes for the Complainant only its main ones pertinent to reaching a decision in this proceeding; it omits in particular references to past ADR panels' decisions that support these contentions. It also notes an invitation by the Complainant to the Panel to regard its submissions concerning the Respondent's lack of rights or of a legitimate interest as being adequate to constitute a prima facie case and thereby to shift the burden of proof on to the Respondent. The Panel does not accept this argumentation, there being ample evidence and grounds in the circumstances of this case for the Panel to proceed to a decision without taking the superfluous step that the Complainant suggests.

PRINCIPAL REASONS FOR THE DECISION

1. Summary review of the evidence in this proceeding

The evidence in this case reveals a clear instance of typosquatting that is employed in respect of a well-known international brand for the pursuit of a demonstrated phishing scam.

2. Findings under the Uniform Dispute Resolution Policy's cumulative test

The Panel FINDS that:

2.1. For the purposes of UDRP Paragraph 4(1)(i), the Complainant has fully established its rights in the trademark JCDECAUX as well as in its longstanding corporate name JCDecaux. It has used its brand prominently in its advertising activities globally, with business operations in 79 countries. The Panel notes the initial three letters of the brand, "JCD", which help to make the brand distinctive yet, being all consonants, make that combination of characters susceptible to misreading and hence a potential target for typosquatting. Here, an extra consonant, the letter "s", is added after the "D" in the disputed domain name, i.e. at a place in the design of the disputed domain name at which some internet users may be induced unconsciously to skip a character optically. Because of this, and of the near-identity of the disputed domain name <jcdsecaux.com> to the Complainant's distinctive brand, the Panel FINDS that there can be no doubt that the disputed domain name surpasses the first UDRP test of confusing similarity to that brand. That similarity is compounded by the Complainant's use of <jcdecaux.com> as its primary domain name globally and the Respondent's choice of registration under the <.com> Top Level Domain name.

2.2. For the purposes of Paragraph 4(1)(ii), the Respondent has no rights or legitimate interest in the disputed domain name. The UDRP's second test is even more clearly met by reason of:

- the discrepancy between the Respondent's identifying details given at registration of the disputed domain name and the names of the actual individual and business at the street address used;
- the absence of any connection between the Respondent and the Complainant's (albeit misspelt) brand incorporated in the disputed domain name's stem or with the Complainant itself; and
- the damning evidence of phishing that reveals an illegitimate interest that the Respondent does have in the disputed domain name, i.e. for its utility in deceiving those who have business with the Complainant. In this regard, the Panel must doubt that the instance demonstrated by the Complainant is an isolated case, meaning there is a risk to other internet users.

2.3. For the purposes of Paragraph 4(1)(iii), the Respondent designed the intentionally misspelt rendition of the Complainant's brand in the disputed domain name as an artefact for subsequent illegitimate use, and that such use was demonstrated by requesting a victim of phishing to re-route, in the Respondent's favour, payments that are due to the Complainant. The Panel FINDS that this combination of illegitimate design at registration and of use of the disputed domain name in perpetrating a financial scam exemplifies bad faith, thereby satisfying the final part of the UDRP's cumulative test.

For these reasons the Panel ORDERS the transfer of the disputed domain name to the Complainant.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

AND THE DISPUTED DOMAIN NAME(S) IS (ARE) TO BE

- 1. **jcdsecaux.com**: Transferred

PANELLISTS

Name	Kevin Madders
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DATE OF PANEL DECISION 2026-10-16

Publish the Decision