



CANADIAN INTERNATIONAL INTERNET DISPUTE RESOLUTION CENTRE

DOMAIN NAME DISPUTE

ADMINISTRATIVE PANEL

DECISION

CIIDRC case number:	27183-UDRP	Decision date: July 6, 2026
Domain Name:	addison-electronique.com	
Registrar:	1API GmbH	
Panel:	Nathalie Dreyfus	
Complainant:	Jeremy Labreche / Addison Electronique Entreprise Inc.	
Respondent:	Maxime Labrèche Organization: 9117-4227 QUÉBEC INC.	

1. PROCEDURAL HISTORY

The procedural history of this case was set out in a letter from the Canadian International Internet Dispute Resolution Centre to the Panel:

On May 11, 2026, the Complainant filed a Complaint with the Canadian International Internet Dispute Resolution Centre (“CIIDRC” or the “Center”) pursuant to the Uniform Domain Name Dispute Resolution Policy (the “Policy”), the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”), and the CIIDRC Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the “Supplemental Rules”). The Center verified that the Complaint satisfied the formal requirements of the Policy, the Rules, and the Supplemental Rules, and confirmed receipt of the required filing fee.

On May 11, 2026, the Center transmitted a request for registrar verification to 1API GmbH, the registrar of record for the disputed domain name. On May 13, 2026, the Registrar confirmed the identity and contact details of the Respondent, confirmed that the disputed domain name had been placed under a Registrar Lock, and confirmed that the disputed domain name was created on May 4, 2001, with English as the language of the registration agreement. The Complainant thereafter amended the Complaint to reflect this information.

On May 22, 2026, the Center confirmed that the amended Complaint complied with the Policy, the Rules, and the Supplemental Rules, and formally commenced the administrative proceeding. In accordance with Rule 4(b), the Center notified the Respondent of the Complaint and of the commencement of the proceeding, setting June 11, 2026, as the deadline to file a Response under Rule 5.

On June 5, 2026, the Respondent filed a Response via the CIIDRC online platform, electing a single-member Panel and requesting a finding of Reverse Domain Name Hijacking against the Complainant.

On June 6, 2026, the Complainant sent to the Center, unsolicited, further submissions (transmitted via two emails) responding to the Response. On June 10, 2026, the Center forwarded those submissions to the Respondent for information.

On June 11, 2026, counsel for the Respondent (Ms. Caroline Guy, Groupe TCJ) submitted a further communication addressing the Complainant's further submission, expressly noting that the Rules do not provide for such additional filings absent exceptional circumstances.

The required Panel fee deposit for a single-member Panel was received on June 12, 2026, in accordance with Rule 6(b) of the Rules.

On June 22, 2026, the Center appointed the undersigned, Nathalie Dreyfus, as the sole Panelist in this proceeding. The Panel submitted the Statement of Acceptance and Declaration of Impartiality and Independence required by Rule 7, and finds that it has been properly constituted.

The Panel has reviewed the Complaint, the amended Complaint, the Response, and the parties' further, unsolicited submissions referred to above. As explained in Section 4 below, it is unnecessary for the Panel to decide whether to admit those further submissions, since they do not affect the outcome of this proceeding.

The language of the proceeding is English, being the language of the registration agreement, pursuant to Rule 11(a) of the Rules.

The Domain Name was registered on May 4, 2001.

This matter is conducted pursuant to the Uniform Domain Name Dispute Resolution Policy (the Policy) and the Rules for Uniform Domain Name Dispute Resolution Policy (the Rules) of the Internet Corporation for Assigned Names and Numbers (ICANN).

2. FACTS ALLEGED BY THE PARTIES

The disputed domain name <addison-electronique.com> was registered on May 4, 2001. The registrant of record is 9117-4227 Québec Inc., of which the Respondent, Maxime Labrèche, is Vice-President.

The Complaint states that J  r  my Labr  che is the owner of Addison   lectronique Entreprise Inc. (NEQ 2281364051), which it describes as federally incorporated in Canada and authorized by the Registre des entreprises du Qu  bec to use “Addison” as its trade name in that province. In an unsolicited further submission dated June 6, 2026, however, the Complainant describes the same NEQ number as belonging to an unincorporated “Entreprise Individuelle” with a declared activity in “research and development,” rather than to the federally incorporated company described in the Complaint. Neither the Complaint nor the record reconciles these two inconsistent descriptions, by the Complainant himself, of the same registration number.

The Complaint states that the Complainant filed the ADDISON trademark application (No. 2429036) on October 6, 2025 “through his wholly-owned company Addison   lectronique Entreprise Inc. (NEQ 2281364051)” and separately describes that company as “federally incorporated in Canada.” The Response, however, states in its chronology of events said to support a finding of Reverse Domain Name Hijacking that a federal corporation under this name (“Addison   lectronique Entreprises Inc.”) was only incorporated on January 20, 2026 – more than three months after the trademark application is said to have been filed through it, and after the Respondent’s first cease-and-desist letter of December 22, 2025. Neither the Complaint nor the record otherwise reconciles this apparent inconsistency in the incorporation date of the corporate vehicle through which the Complainant says he filed his trademark application.

This application (No. 2429036) remains pending as of the date of this decision; no evidence that it has proceeded to registration has been provided.

The Complainant claims to own Canadian trademark registration TMA803748 for MADDISON   LECTRONIQUE, registered since August 5, 2011 and renewed in 2026, and states that he is a shareholder of the company associated with that mark. The Panel’s verification of the public trademark register, within the limited independent research a panel may undertake into matters of public record (WIPO Overview 3.0, section 4.8), confirms that TMA803748 is registered in the name of a corporate entity (Maddison Electronics Inc., of Laval, Qu  bec) rather than in the Complainant’s personal name. The Response, supported by an extract from the Quebec enterprise register, asserts that the Complainant is only a minority shareholder of that company, that more than 75% of its voting rights are held by a third individual (Christian Labr  che), and that the Complainant is not a director of the company. The Complaint does not dispute this or otherwise establish any licence, assignment, or authorization entitling the Complainant to rely on TMA803748 in his personal capacity.

The Complaint further asserts that the Complainant owns and controls a portfolio of approximately twenty domain names incorporating variations of “Addison” and “Addison   lectronique” as evidence of a substantial and longstanding legitimate interest in that brand, including addisonelectronique.com, which the Complaint describes as having “been active for many years.” No registration records or other documentary evidence for any of these domain names accompanies the Complaint. The Panel’s own verification of publicly available WHOIS records indicates that these domain names were registered after the disputed domain name (May 4, 2001); in particular, and consistent with the Response, addisonelectronique.com appears to have been registered only on November 29, 2024 – approximately five months before this Complaint was filed.

The Complaint states that “both parties operate in the exact same sector and compete directly on Google Shopping,” as part of its argument that the disputed domain name causes marketplace confusion. In his June 6, 2026 further submission, however, the Complainant describes his own business as operating “in a fundamentally different sector (research & development, web services, blockchain, and cryptocurrency) from the Respondent’s physical electronics retail business.” Neither the Complaint nor the record reconciles these two contradictory characterizations, by the Complainant himself, of his own business activity.

The Respondent asserts continuous use of the ADDISON and ADDISON ÉLECTRONIQUE marks in connection with an electronics retail business since at least 1964 (with use by a predecessor in title said to date from 1961), through a chain of title said to include two corporate mergers and a licensee, and states that the Domain Name was registered in 2001 in connection with that business.

A predecessor company (NEQ 1160849338) associated with the Respondent’s business was struck off the Québec corporate register (“radiée d’office”) in July 2025. A new entity bearing the same name (NEQ 1181062481) was incorporated shortly thereafter. The record contains no documentary evidence of a formal assignment or transfer of the disputed domain name, the asserted marks, or associated goodwill between these two entities.

On July 2, 2025, the Respondent withdrew several registered trade names in Québec, including “Addison L’Entrepôt,” “Addison Électronique Montréal,” “Électronique Addison Montréal,” and “ÉLECTRONIQUE ADDISON.”

The Response states that the Respondent filed Canadian trademark application No. 2458193 for ADDISON on February 25, 2025, and that this application remained pending as of the Response, with the Respondent reserving an intention to oppose the Complainant’s applications if and when they proceed to publication. The Complaint, by contrast, describes an unspecified “later” application by the Respondent as having already been “formally refused” by CIPO for containing unacceptable goods or services descriptions. Neither party has submitted independent documentary confirmation (such as a CIPO file history) resolving this discrepancy as to the filing date and current status of the Respondent’s application. As to the Respondent’s earlier, 2015 application for ADDISON (No. 1736443), the Response states that it was refused by the CIPO examiner on the basis of a likelihood of confusion with the MADDISON ÉLECTRONIQUE registration, that no response was filed to the examiner’s report, and that the application was deemed abandoned before ever proceeding to publication or opposition; the Complaint, by contrast, states that this application “was opposed by the Complainant’s father and was ultimately abandoned.”

The parties are related. The Complaint states that the Complainant’s grandfather owned the original Addison stores until 2002, and that the Complainant’s father founded Maddison Électronique in Laval, Québec, in 1994. The Response describes the Complainant as “reportedly a distant member of the Respondent’s founding family.” In his June 6, 2026 further submission, the Complainant instead describes himself as the Respondent’s

“direct cousin,” tracing the family’s ties to the ADDISON name to the late 1930s through his great-grandfather, Leó Labrèche.

Following cease-and-desist letters sent on behalf of the Respondent on December 22, 2025 and January 22, 2026, the Respondent commenced an action against the Complainant in the Federal Court of Canada on May 4, 2026, claiming CAD 50,000 in damages (the Response’s Schedule H identifies the file number as T-2664-26; the Complainant’s own June 6, 2026 further submission refers to the same action as T-2684-26, a discrepancy that does not appear material to this proceeding). The present Complaint under the Policy was filed one week later, on May 11, 2026.

The Respondent has requested that the Panel find that the Complaint constitutes an attempt at Reverse Domain Name Hijacking.

3. CONTENTIONS OF THE PARTIES

- **Complainant**

The Complainant contends that he holds rights in the marks ADDISON and MADDISON ÉLECTRONIQUE, by virtue of pending Canadian trademark application No. 2429036 (filed October 6, 2025) and an asserted association with Canadian trademark registration TMA803748, and that the disputed domain name is confusingly similar to those marks.

The Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name because the chain of title on which the Respondent relies is broken: the corporate predecessor was struck off in 2025 and several related trade names were withdrawn during the course of this dispute, without documented evidence of any transfer of rights to the current registrant entity.

The Complainant contends that the Respondent registered and has used the disputed domain name in bad faith, relying principally on: (i) the Respondent’s February 2026 trademark application, said to have been filed to block the Complainant’s prior-filed application; (ii) the 2015 refusal of the Respondent’s earlier ADDISON application; (iii) the Respondent’s corporate restructuring and withdrawal of trade names; (iv) the Respondent’s selective enforcement against the Complainant and his family; and (v) the Federal Court claim for CAD 50,000 in damages, which the Complainant characterizes as unsubstantiated and intimidatory.

The Complainant denies that the Complaint was filed in bad faith and asks the Panel to reject the Respondent’s request for a finding of Reverse Domain Name Hijacking.

- **Respondent**

The Respondent contends that it, through its predecessor entities and licensee, has continuously used the ADDISON and ADDISON ÉLECTRONIQUE marks in connection with an electronics retail business since at

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least 1964 (with use by a predecessor said to date from 1961), and that the disputed domain name was registered in 2001 in connection with that longstanding business – well before the Complainant acquired, or could have acquired, any trademark rights.

The Respondent contends that it has rights and legitimate interests in the disputed domain name under Paragraph 4(c)(i) of the Policy, having used the domain name in connection with a bona fide offering of goods and services for approximately 25 years prior to any notice of this dispute.

The Respondent contends that it could not have registered the disputed domain name in bad faith in 2001, since the Complainant's claimed trademark rights (a 2025 application, and an unsubstantiated association with a mark registered in 2011) post-date the Domain Name's registration, and that there is no evidence of bad faith use.

The Respondent requests that the Panel deny the Complaint and, further, find that the Complaint was brought in bad faith, constituting an attempt at Reverse Domain Name Hijacking, given that the Complainant, as a family member with personal knowledge of the Respondent's longstanding use of the ADDISON name and of the 2001 registration date of the Domain Name, knew or should have known that the Complaint could not succeed.

- **Remedy Sought**

The Complainant requests that the disputed domain name be transferred to him.

The Respondent requests that the Complaint be denied and that the Panel find Reverse Domain Name Hijacking on the part of the Complainant.

4. DISCUSSION AND FINDINGS

4.1 Preliminary Issue: Parallel Court Proceedings

Before turning to the three elements of the Policy, the Panel addresses a preliminary procedural matter. The record indicates that the Respondent commenced an action against the Complainant in the Federal Court of Canada on May 4, 2026, one week before this Complaint was filed, concerning the same underlying dispute over the ADDISON name.

Rule 18(a) of the Rules gives the Panel discretion, where legal proceedings have been initiated prior to or during a UDRP proceeding in respect of a domain-name dispute that is the subject of the Complaint, to suspend or terminate the administrative proceeding, or to proceed to a decision.

The Panel has considered this option and has determined, in the exercise of its discretion, to proceed to a decision on the merits below. The Panel notes, however, that the existence of the parallel Federal Court proceeding,

commenced before this Complaint was filed and concerning the same dispute, could alone have supported suspension or termination of this proceeding without reaching the substantive elements of the Policy.

4.2 Requirements

In accordance with Paragraph 4 of the Policy, the onus is on the Complainant to prove that:

1. the Domain Name is Identical or Confusingly Similar to a trademark or service mark in which the Complainant has rights;
2. the Respondent has no rights or legitimate interests in respect of the Domain Name; and
3. the Domain Name has been registered and is being used in bad faith.

The Panel will consider each of these requirements in turn.

4.3 Analysis

4.2.1 The Domain Name is Identical or Confusingly Similar to a Mark in which the Complainant has Rights

The Domain Name incorporates the term ADDISON in its entirety. Had the Complainant established rights in a mark consisting of or including ADDISON, the Domain Name would likely be considered identical or confusingly similar to that mark under the relatively low threshold test applicable to the first element (WIPO Overview 3.0, section 1.7).

A pending trademark application does not, however, by itself establish trademark rights within the meaning of Paragraph 4(a)(i) of the Policy (WIPO Overview 3.0, section 1.1.4). The Complainant's Canadian trademark application No. 2429036 for ADDISON, filed on October 6, 2025, remains pending and therefore cannot, on its own, found standing to bring this Complaint.

The Complainant's claimed rights in Canadian trademark registration TMA803748 for MADDISON ÉLECTRONIQUE are likewise insufficient to found standing. As noted in Section 2 above, TMA803748 is registered in the name of a corporate entity, not in the Complainant's personal name, and the uncontested evidence in the record indicates that the Complainant holds, at most, a minority shareholding in that company, without any director role or other demonstrated authority over the mark. A shareholding interest, even accepted at face value, does not by itself entitle a shareholder to rely on a company's trademark registration for standing to bring a UDRP complaint in his own name; some further showing of authorization, licence, or assignment is required, and none has been made here.

The Complainant has also not put forward evidence capable of establishing unregistered or common law rights of his own in ADDISON or MADDISON ÉLECTRONIQUE, such as evidence of acquired distinctiveness through the duration, nature, and extent of his personal use of the term.

The Panel further notes that the case caption names the Complainant as “Jeremy Labreche / Addison Electronique Entreprise Inc.” The Complaint identifies this second-named entity as the Complainant’s “wholly-owned company,” through which the ADDISON application is said to have been filed on October 6, 2025. As noted in Section 2 above, however, the Response indicates that this company was only incorporated on January 20, 2026 – an apparent inconsistency that the record does not resolve, and that further undermines confidence in the Complainant’s account of his own corporate structure and the basis for his claimed rights. Where a complaint is brought in the name of multiple or related parties, panels expect a clear and consistent explanation of the relationship between them, none is available here, which compounds the standing difficulties identified above.

For these reasons, the Panel finds that the Complainant has not established that he holds a trademark or service mark in which he has rights, and that the first element of Paragraph 4(a) of the Policy has not been satisfied. Because a complainant must satisfy all three elements of Paragraph 4(a), this finding is sufficient, by itself, to dispose of the Complaint. The Panel nonetheless addresses the second and third elements below, for completeness and in view of the Respondent’s submissions and request for a finding of Reverse Domain Name Hijacking.

4.2.2 Rights or Legitimate Interests in respect of the Domain Name

Even assuming, for the sake of argument, that the Complainant had established rights in a relevant mark, the Panel would nonetheless find that the Respondent has rights or a legitimate interest in the Domain Name.

The uncontested evidence is that the Domain Name was registered on May 4, 2001, and has since been used in connection with an electronics retail business bearing the ADDISON name, operated by the Respondent and, before it, by related corporate predecessors. This is sufficient to establish, *prima facie*, that the Respondent has used the Domain Name in connection with a bona fide offering of goods or services well before any notice of this dispute, within the meaning of Paragraph 4(c)(i) of the Policy.

The Complainant’s argument that the Respondent’s rights are undermined by the 2025 dissolution and recreation of a corporate predecessor, and by the withdrawal of certain related trade names in July 2025, goes to the continuity of the Respondent’s corporate history; it does not, without more, negate the Respondent’s demonstrated and uncontested use of the ADDISON name and of the Domain Name itself since 2001. Nor does the timing of either party’s trademark applications – filed in October 2025 and February 2026 respectively,

i.e. long after the Domain Name was registered – bear on whether the Respondent has rights or legitimate interests in the Domain Name.

The Complainant has therefore not met his burden – even prima facie – of showing that the Respondent lacks rights or legitimate interests in the Domain Name, and the second element of Paragraph 4(a) of the Policy is not satisfied.

4.2.3 Registration and Use of the Domain Name in Bad Faith

Paragraph 4(a)(iii) of the Policy requires the Complainant to prove that the Domain Name was both registered and is being used in bad faith. The uncontested evidence establishes that the Domain Name was registered on May 4, 2001 – more than twenty years before the Complainant filed his trademark application in October 2025, and well before the earliest trademark rights (2011) with which the Complainant, without establishing standing to rely on them, associates himself.

Where a domain name has been registered before a complainant acquired, or could have acquired, trademark rights, a finding of bad faith registration will be possible only in exceptional circumstances, such as where the respondent registered the domain name in anticipation of the complainant's yet-to-be-acquired rights. Nothing in the record suggests any such circumstance. On the contrary, the Domain Name appears to have been registered in connection with a pre-existing family business bearing the ADDISON name, well before the Complainant's own claimed rights arose.

Nor is there any evidence that the Respondent has used the Domain Name in bad faith: the record contains no indication that the Domain Name has been used to divert consumers, to tarnish any mark claimed by the Complainant, or for any of the purposes described in Paragraph 4(b) of the Policy.

The Panel therefore finds that the Complainant has failed to establish that the Domain Name was registered and is being used in bad faith, and that the third element of Paragraph 4(a) of the Policy is not satisfied.

Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that if, after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking ("RDNH"), the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

The Panel finds that this is such a case. Panels have found RDNH where the facts demonstrate that the complainant knew, or clearly ought to have known, that it could not succeed on any of the required elements – including a lack of relevant trademark rights, or clear knowledge that the disputed domain name was registered well before the complainant acquired trademark rights. Several such facts are present here.

First, the Complainant's own accounts of his family history – the Complaint's description of his grandfather's ownership of the original Addison stores until 2002 and his father's founding of Maddison Électronique in 1994, and his June 6, 2026 further submission's description of himself as the Respondent's "direct cousin" with family ties to the ADDISON name dating to the late 1930s – indicate personal, first-hand, and longstanding knowledge of the Respondent's and its predecessors' use of that name. Second, the creation date of the Domain Name (May 4, 2001) was a matter of public record, readily verifiable through a Whois search, before the Complaint was filed. Third, the Complainant's own claimed trademark rights are, at best, a pending trademark application filed on October 6, 2025 and a minority, non-controlling shareholding in a corporation that holds a 2011 trademark registration – neither of which could plausibly support a claim that the Respondent registered the Domain Name in bad faith in 2001.

Fourth, the Complaint represents to the Panel that the Complainant's domain name addisonelectronique.com "has been active for many years," invoking it, together with a broader portfolio of similarly-formed domain names, as evidence of a substantial and longstanding legitimate interest in the Addison brand. As noted in Section 2 above, this representation does not withstand verification: the domain name in question was registered only on November 29, 2024, shortly before the parties' dispute escalated, and no evidence was provided for the registration dates of the remaining domain names in the cited portfolio. A complainant's mischaracterization of the age and continuity of its own online presence, in support of its claimed rights, is a further factor weighing in favour of a finding of RDNH.

Fifth, the Complainant's own filings contain further internal contradictions bearing directly on the elements he was required to prove. He describes NEQ 2281364051 in the Complaint as a federally incorporated company, and in his June 6, 2026 further submission as an unincorporated Entreprise Individuelle. He also describes his business, in the Complaint, as operating in "the exact same sector" as the Respondent's, while in that same further submission describing it as operating in "a fundamentally different sector." A complainant's inability to consistently describe the very corporate vehicle through which he claims rights, or the business said to compete with the Respondent's, further undermines the credibility of the Complaint as a good-faith invocation of the Policy.

In these circumstances, the Complainant knew, or clearly should have known, that he could not succeed in establishing at least the first and third elements of the Policy. The Panel notes that the Complaint was filed shortly after the Respondent commenced Federal Court proceedings against the Complainant, which suggests that the Complaint may have been intended, at least in part, as a defensive or retaliatory step within a broader family and commercial dispute, rather than as a genuine attempt to remedy cybersquatting within the narrow scope of the Policy. The Panel has taken into account that the Complainant appears to be self-represented; however, self-represented status does not excuse a complainant from the objective facts that were reasonably available to him prior to filing.

Accordingly, the Panel finds that the Complaint was brought in bad faith and constitutes an abuse of this administrative proceeding, within the meaning of Paragraph 15(e) of the Rules.

5. DECISION and ORDER

For the above reasons, in accordance with Paragraph 4 of the Policy, Paragraph 15 of the Rules, and Rule 10 of the Supplemental Rules, the Panel orders that:

- (a) the Complaint is denied; and
- (b) the Complaint was brought in bad faith and constitutes Reverse Domain Name Hijacking, within the meaning of Paragraph 15(e) of the Rules.

Made as of July 6, 2026.

SIGNATURE OF PANEL

