

## **ADMINISTRATIVE PANEL DECISION**

Crédit Agricole Corporate and Investment Bank, S.A.,  
Crédit Agricole S.A. v. Todd Falaw  
Case No. D2026-0431

### **1. The Parties**

The Complainant is Crédit Agricole Corporate and Investment Bank, S.A. (the “First Complainant”), France, and Crédit Agricole S.A. (the “Second Complainant”), France, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondent is Todd Falaw, United States of America.

### **2. The Domain Name and Registrar**

The disputed domain name <ca-ciib.com> is registered with Gname.com Pte. Ltd. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 3, 2026. On February 3, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 4, 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 (Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 4, 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 February 6, 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 February 6, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 26, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on February 6, 2026.

The Center appointed Willem J. H. Leppink as the sole panelist in this matter on March 4, 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 following facts are not contested.

The First Complainant Crédit Agricole Corporate and Investment Bank, S.A. is a wholly owned subsidiary of the Second Complainant, Crédit Agricole S.A. (“Crédit Agricole”). The Panel will refer to the Complainants in this decision as “the Complainant”, if there is no reason for distinguishing between the two Complainants.

Crédit Agricole has roots dating back to 1894 when small local banks were set up to support local agriculture, and which later formed the foundation of the institutional “pyramid” created by Crédit Agricole. Headquartered in France, Crédit Agricole is an international banking group which is made up of a network of banks and financial service companies providing a full spectrum of banking and financial services including retail banking, insurance, specialized consumer credit services, corporate and investment banking. Crédit Agricole is a publicly traded company, which reported EUR 9,731 million of revenue for the third quarter of 2025. It has over 54 million retail customers, 12,1 million mutual shareholders and 157,000 employees worldwide.

The subsidiary of the Second Complainant, Crédit Agricole Corporate and Investment Bank, S.A., traces its origins from 1994, after the purchase of Banque Indosuez by Crédit Agricole and later in 2004, by the transfer of assets from Crédit Lyonnais’s Corporate and Investment Banking division (CALYON). The subsidiary was rebranded Crédit Agricole Corporate & Investment Bank (CACIB) in February 2010. Currently this subsidiary employs 10,400 employees worldwide, across more than 35 countries.

The Complainant has a large Internet presence and interacts with customers globally via its website and social media profiles. The Complainant’s primary website for its CACIB and CA brands and trademark is hosted at its domain names <ca-cib.com>, registered on April 3, 2003, and <credit-agricole.com> registered on December 31, 1999.

The Complainant has various trademark registrations worldwide, for marks including the elements CACIB, CA CACIB and CA, including the French trademark registration CACIB (word mark), with registration number 4839559 and an application / registration date of February 1, 2022 for services in class 36 and a European Union trademark registration CA CACIB CRÉDIT AGRICOLE CORPORATE AND INVESTMENT BANK (figurative mark), with registration number 008915721 and a registration date of August 18, 2010 for goods and services in classes 9, 16, 35, 36, 38, 42.

The disputed domain name was registered on September 27, 2025, and at the time of filing the Complaint, did not resolve to an active page. However, the Complainant provides evidence that the Respondent has configured MX (“Mail Exchange”) records for the disputed domain name.

#### **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 the following.

The record identifies the Respondent as “Todd Falaw” which does not resemble the disputed domain name in any manner. There is no evidence that the Respondent is commonly known by the disputed domain name.

The Respondent is using the disputed domain name to redirect Internet users to a website that resolves to a blank page and lacks content. Additionally, the disputed domain name has been set up MX record by the Respondent. The Respondent’s likely intent to use email from the disputed domain name to pass itself off as the Complainant and/or for fraudulent purposes is neither a bona fide offering of goods or services, nor a legitimate noncommercial or fair use.

The Complainant and its CACIB and CA trademarks are known internationally.

The registration of the disputed domain name is a clear example of typo-squatting as the disputed domain name is a one-letter typo of the Complainant’s CACIB trademark. The composition of the disputed domain name makes it illogical to believe that the Respondent registered the disputed domain name without specifically targeting the Complainant.

## **B. Respondent**

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

## **6. Discussion and Findings**

### **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 Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 1.7.

The Complainant has shown rights in respect of trademarks or service marks in relation to CA CACIB CRÉDIT AGRICOLE CORPORATE AND INVESTMENT BANK, and CACIB for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

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

Moreover, the Panel finds that, as contended by the Complaint, the Respondent, on a balance of probabilities, may have registered the disputed domain name to impersonate the Complainant by sending emails.

The Panel finds the second element of the Policy has been established.

### **C. Registered and Used in Bad Faith**

The Panel refers to its consideration under section 6.B of this Decision.

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.

In the present case, the Panel notes that the Respondent knew or should have known of the Complainant, and that the Respondent on a balance of probabilities attempts or has attempted to impersonate the Complainant, with an intention to defraud customers.

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. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the reputation of the Complainant's trademark, and the composition of the disputed domain name in relation to the Complainant's domain name <ca-cib.com>, and the lack of a response from the Respondent, 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.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitutes 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 <ca-ciib.com> be transferred to the Complainant.

*/Willem J. H. Leppink/*

**Willem J. H. Leppink**

Sole Panelist

Date: March 9, 2026