

ADMINISTRATIVE PANEL DECISION

N. M. Rothschild & Sons Limited v. Name Redacted
Case No. D2026-1230

1. The Parties

The Complainant is N. M. Rothschild & Sons Limited, United Kingdom, represented by Freshfields LLP, United Kingdom.

The Respondent is Name Redacted.¹

2. The Domain Names and Registrars

The disputed domain names <bp-rothschild.com> and <martinmaurelpatrimoine.com> are registered with Squarespace Domains II LLC (the “First Registrar”).

The disputed domain name <gestionprivee-martinmaurel.com> is registered with Tucows Domains Inc. (the “Second Registrar”).

The disputed domain names mentioned above will be jointly referred to as the “Disputed Domain Names”.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 22, 2026. On March 23, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On March 23, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Disputed Domain Names which differed from the named Respondent (Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 26, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaint(s) for the Disputed Domain Names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all Disputed Domain Names are under common control. The Respondent sent an email communication to the Center on March 27, 2026. The Complainant filed an amended Complaint on March 31, 2026.

¹The Respondent appears to have used the name of employees and entities of the Complainant’s group when registering the Disputed Domain Names. In light of the potential identity theft, the Panel considers it appropriate to redact the Respondent’s name from the present decision to avoid any confusion or reputational damage to the concerned persons and entities. To allow the Registrars to properly execute the Panel’s decision, the names used by the Respondent are mentioned in Annex 1 which shall not be published.

On March 26, 2026, the Center informed the parties in French and English, that the language of the registration agreement for the disputed domain name <bp-rothschild.com> is French. On March 31, 2026, the Complainant requested English to be the language of the proceeding. The Respondent did not submit any comment on the Complainant's submission.

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 in French and English, and the proceedings commenced on April 14, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 4, 2026. Apart from a short email to the Center on March 27, 2026, the Respondent did not submit any formal response.

The Center appointed Flip Jan Claude Petillion as the sole panelist in this matter on May 6, 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, N. M. Rothschild & Sons Limited, is part of the Rothschild & Co group, which has been providing financial services internationally for over 200 years. In particular, it provides M&A, strategy and financing advice, as well as investment and wealth management solutions to large institutions, families, individuals and governments. The Complainant's group also operates Rothschild Martin Maurel ("RMM"), its French private banking and wealth management subsidiary.

The Complainant invokes several trademarks held by entities which are claimed to be part of the Complainant's group. These trademarks include the following:

- ROTHSCHILD, European Union word mark registered under number 000206458 on October 8, 1998, in classes 14, 35, and 36;
- ROTHSCHILD, United States of America word mark registered under number 3447667 on June 17, 2008, in classes 35 and 36;
- ROTHSCHILD MARTIN MAUREL, French trademark registered under number 5035530 on June 21, 2024, in class 36;
- the French figurative mark depicted below, registered under number 4263306 on April 8, 2016, in class 36:



The Disputed Domain Names have been registered on the following dates:

- <martinmaurelpatrimoine.com> and <gestionprivee-martinmaurel.com> - October 27, 2025;
- <bp-rothschild.com> - December 3, 2025.

The Disputed Domain Names either resolve to a parking page or do not resolve to an active page. According to the Complainant's evidence, all Disputed Domain Names were used to send emails mentioning trademarks and logos of the Complainant's group.

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 Names.

Notably, the Complainant contends that the Disputed Domain Names are confusingly similar to trademarks in which it claims to have rights.

Second, the Complainant claims that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Names, as, according to the Complainant:

- there is no relationship between the Respondent and the Complainant. Neither "Martin Maurel" nor "Rothschild" is a descriptive term and the Complainant has not licensed or otherwise permitted the Respondent to use the "Rothschild" or the "Martin Maurel" names or trademarks, or to register a domain name incorporating any of them;
- the Complainant has not found any evidence that the Respondent has been commonly known by the Disputed Domain Names;
- the Respondent is not currently using, and has not used (or made demonstrable preparations to use), the Disputed Domain Names in connection with a bona fide offering of goods or services (nor could it do so).

Finally, the Complainant claims that the Disputed Domain Names were registered and are being used in bad faith. According to the Complainant:

- the trademarks invoked by the Complainant are extremely well-known in connection with the Complainant's group and the Complainant has substantial goodwill and reputation in names containing "Martin Maurel" and "Rothschild". The Respondent must have been aware of the Complainant's rights at the time it registered the Disputed Domain Names, in particular because the Disputed Domain Names all contain distinctive elements of the relevant trademarks;
- the Disputed Domain Names have been actively used to conduct a sophisticated and coordinated fraudulent scheme. The Respondent has sent emails from addresses at each of the Disputed Domain Names to impersonate the Complainant's group and its affiliate RMM, fraudulently offering financial products. The impersonation of specific, identifiable employees of the Complainant's group (including RMM) demonstrates a deliberate and calculated attempt to deceive recipients by adding a false layer of authenticity to the fraud.

The Complainant therefore claims that the Disputed Domain Names have been registered in bad faith by the Respondent in an attempt to intentionally mislead internet users into associating the Disputed Domain Names with the Complainant's website, by creating a likelihood of confusion with the Complainant's trade marks as to the source, sponsorship, affiliation or endorsement of the Disputed Domain Names.

B. Respondent

On March 27, 2027, the Respondent sent an email to the Center in response to the Center's email communication to the Complainant dated March 26, 2026, which included the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars. The Respondent stated that it did not understand the request, that it is creating a blog and does not use anyone's name. The Respondent did not submit a formal Response.

6. Discussion and Findings

6.1. Preliminary Procedural Issue: Consolidation of Multiple Domain Names and Respondents

Paragraph 10(e) of the Rules grants a panel the power to consolidate multiple domain name disputes. At the same time, paragraph 3(c) of the Rules provides that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain-name holder.

Where a complaint is filed against multiple respondents, panels look at whether: (i) the domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all parties. Procedural efficiency would also underpin panel consideration of such a consolidation scenario.

Panels have considered a range of factors, typically present in some combination, as useful to determining whether such consolidation is appropriate, such as similarities in or relevant aspects of: (i) the registrants' identity(ies) including pseudonyms; (ii) the registrants' contact information including email address(es), postal address(es), or phone number(s), including any pattern of irregularities; (iii) relevant IP addresses, name servers, or webhost(s); (iv) the content or layout of websites corresponding to the disputed domain names; (v) the nature of the marks at issue (e.g., where a registrant targets a specific sector); (vi) any naming patterns in the disputed domain names (e.g., <mark-country> or <mark-goods>); (vii) the relevant language/scripts of the disputed domain names particularly where they are the same as the mark(s) at issue; (viii) any changes by the respondent relating to any of the above items following communications regarding the disputed domain name(s); (ix) any evidence of respondent affiliation with respect to the ability to control the disputed domain name(s); (x) any (prior) pattern of similar respondent behavior, or (xi) other arguments made by the complainant and/or disclosures by the respondent(s). WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.11.2.

In the present case, the Complainant presented a variety of factors justifying a consolidation scenario, including the following:

- the Disputed Domain Names have been used in a coordinated and identical fraudulent scheme. More specifically, all Disputed Domain Names have been used to send fraudulent emails sharing considerable areas of identical (or near-identical) script;
- the emails linked to all three Disputed Domain Names appear to impersonate genuine employees of the Complainant's group;
- the abusive activity is combined with the use of genuine employee names as the registrant information;
- the Disputed Domain Names were all registered within a five-week period.

Upon reviewing the evidence, the Panel generally agrees with the Complainant's arguments. The disputed domain name <martinmaurelpatrimoine.com> does not seem to use a genuine employee name as the registrant information but still uses a distinctive part of some trademarks of the Complainant's group as a personal name. Therefore, the Panel finds that the Disputed Domain Names are subject to the common ownership or control of the same entity or person, which will be referred to as the Respondent.

The Panel also considers the consolidation of the Disputed Domain Names to be fair and procedurally efficient. Accordingly, the Panel concludes that the consolidation of all Disputed Domain Names asserted by the Complainant against the Respondent is consistent with the Policy and Rules. The Panel will proceed to a decision on the merits regarding all Disputed Domain Names.

6.2. Preliminary procedural issue: Language of the Proceeding

The language of the registration agreement for the Disputed Domain Names is English, except for the disputed domain name <bp-rothschild.com> (French). Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including the fact that:

- two of the three registration agreements are in English and it would be disproportionate and inconsistent to require part of these consolidated proceedings to be conducted in French and part in English; and
- the evidence strongly supports that the Disputed Domain Names are under common control.

The Respondent did not comment on the Complainant's request for the language of the proceeding but sent an email communication in French.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs. [WIPO Overview 3.1](#), section 4.5.1.

In the circumstances of the present case, including the Panel's finding regarding the Disputed Domain Names being under common control, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

6.3. Substantive elements of the Policy

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 textual components of the Complainant's trademarks and the Disputed Domain Names. [WIPO Overview 3.1](#), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. Even though the Panel would have appreciated that the Complainant evidences its link with the trademark holders, a cursory search enabled the Panel to identify this link as likely.

The Panel observes that the Disputed Domain Names all include a trademark invoked by the Complainant or at least a dominant and/or a distinctive part of such trademark, i.e. ROTHSCHILD or MARTIN MAUREL. In such cases, a domain name will normally be considered confusingly similar to the incorporated mark for purposes of UDRP standing. [WIPO Overview 3.1](#), section 1.7.

Additionally, the Panel finds that the addition of terms such as "patrimoine", "gestionprivée-", or "bp-" does not prevent a finding of confusing similarity between the Disputed Domain Names and the relevant marks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

It is well established that generic Top-Level Domains, here ".com", may be disregarded when considering whether the Disputed Domain Names are confusingly similar to trademarks in which the Complainant has rights. [WIPO Overview 3.1](#), section 1.11.

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 Names. 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 Names such as those enumerated in the Policy or otherwise.

The Panel notes that the Respondent has not been commonly known by the Disputed Domain Names and that the Respondent does not seem to have acquired trademark or service mark rights. According to the Whois records connected to the Disputed Domain Names, the Respondent appears to have used the name of employees and entities of the Complainant's group as contact information. There are no indications that a connection between the Complainant and the Respondent existed.

Moreover, the Panel is of the opinion that the Respondent is not making a legitimate noncommercial or fair use of the Disputed Domain Names. While the Disputed Domain Names currently do not resolve to active websites, the Respondent has actively used email addresses connected to the Disputed Domain Names to send emails impersonating employees of the Complainant's group and its affiliate RMM to offer financial products. Emails linked to all Disputed Domain Names mention (dominant and distinctive elements of) trademarks invoked by the Complainant, company names, general company information, and even logo's used by the Complainant's group.

Panels have held that the use of a domain name for illegitimate activity (e.g. phishing/identity theft, passing off, or other types of fraud) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

The Respondent had the opportunity to demonstrate its rights or legitimate interests but did not do so. In the absence of a reply from the Respondent, the prima facie case established by the Complainant has not been rebutted.

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. Among these factors demonstrating bad faith registration and use is the use of a domain name to intentionally attempt to attract, for commercial gain, Internet users to a website or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website or location or of a product or service on the website or location.

In the present case, it is inconceivable that the Respondent was unaware of the Complainant's group and its trademark rights when it registered the Disputed Domain Name. As mentioned above, emails linked to all Disputed Domain Names mention (dominant and distinctive elements of) trademarks invoked by the Complainant, company names, general company information and logo's used by the Complainant's group. The Respondent appears to have impersonated genuine employees of the Complainant's group in the emails. The Panel finds that the Respondent's awareness of the Complainants' trademark rights at the time of registration suggests bad faith (See *Red Bull GmbH v. Credit du Léman SA, Jean-Denis Deletraz*, WIPO Case No. [D2011-2209](#); *Nintendo of America Inc. v. Marco Beijen, Beijen Consulting, Pokemon Fan Clubs Org., and Pokemon Fans Unite*, WIPO Case No. [D2001-1070](#); and *BellSouth Intellectual Property Corporation v. Serena, Axel*, WIPO Case No. [D2006-0007](#)).

In the present case, the Panel is of the opinion that the trademarks invoked by the Complainant have a strong reputation in the finance and banking sector. This makes it difficult to conceive any plausible legitimate use of the Disputed Domain Names by the Respondent, which combine (dominant and distinctive elements of) trademarks invoked by the Complainant with terms related to this sector, such as “bp” (which can be considered as an abbreviation for “banque privée” meaning “private bank” in English), “patrimoine” (meaning “assets” in English) or “gestion privée” (meaning “private management” in English). Further, the Respondent’s use of the Disputed Domain Names to impersonate (employees of) the Complainant’s group constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

Finally, by failing to respond to the Complaint, the Respondent did not take any initiative to contest the foregoing. Pursuant to paragraph 14 of the Rules, the Panel may draw the conclusions it considers appropriate.

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 Names <bp-rothschild.com>, <gestionprivee-martinmaurel.com> and <martinmaurelpatrimoine.com> be transferred to the Complainant.

/Flip Jan Claude Petillion/

Flip Jan Claude Petillion

Sole Panelist

Date: May 20, 2026