

ADMINISTRATIVE PANEL DECISION

Principal Financial Services, Inc. v. Walter Rau, O'Keefe, Luettggen and Lowe
Case No. D2026-1266

1. The Parties

The Complainant is Principal Financial Services, Inc., United States of America ("United States"), represented by Neal & McDevitt, LLC, United States.

The Respondent is Walter Rau, O'Keefe, Luettggen and Lowe, Ireland.

2. The Domain Name and Registrar

The disputed domain name <accounts-principal.com> is registered with Hello Internet Corp (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on March 24, 2026. On March 25, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 27, 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 (Registrant Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 27, 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 amendment to the Complaint on March 28, 2026.

The Center verified that the Complaint together with the amendment to the 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 April 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 24, 2026.

The Center appointed Tobias Malte Müller as the sole panelist in this matter on April 30, 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

It results from the Complainant's documented allegations, which remained undisputed, that it is a publicly-traded multi-national financial services institution offering, through its licensees, member companies and affiliates, a broad range of services in the financial, insurance, investment, banking, retirement, global asset management, real estate, and healthcare sectors.

The Complaint is based on United States Reg. No. 1,562,541 for PRINCIPAL registered on October 24, 1989 for services in class 36 and with first use in commerce dating back to 1960. This mark has duly been renewed and is in force.

The Respondent registered the disputed domain name on January 26, 2026. The language of the Registration Agreement is English.

The disputed domain name previously resolved to a login page, showing the Complainant's logo and impersonating the Complainant's genuine login page under "www.accounts.principal.com" login portal. The login page included a copyright notice in the footer which read "© 2025 Principal Financial Services, Inc.". The Complainant's internal investigation further revealed that the IP address associated with the disputed domain name had been used to host additional phishing websites impersonating other financial services providers, demonstrating a broader pattern of malicious activity rather than any legitimate purpose. At the time of filing of the Complaint, the website at the disputed domain name was inactive.

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 that:

- (1) the disputed domain name incorporates the PRINCIPAL mark in its entirety and is therefore confusingly similar to the latter. The presence of "accounts-" within the disputed domain name does not eliminate the confusing similarity;
- (2) the Complainant has not authorized the Respondent to use the PRINCIPAL mark in a domain name, at any website, or for any other purpose. Furthermore, the Respondent is not commonly known by the disputed domain name, which evinces a lack of rights or legitimate interests; and
- (3) at the time of registration, the Respondent knew of the Complainant's longstanding trademark rights. This is shown from the Respondent's actions of promptly imitating the Complainant by setting up a bogus login page imitating the Complainant. The Respondent apparently has also been associated with a pattern of cybersquatting behavior, including the registration of other domain names incorporating marks targeting financial companies. The Respondent has used the disputed domain name to impersonate the Complainant or to mimic the Complainant's official website, including its login portal.

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 a trademark or service mark PRINCIPAL for the purposes of the Policy, [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the entirety of this mark is reproduced and recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy, [WIPO Overview 3.1](#), section 1.7.

Although the addition of another term, here "accounts-", may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy, [WIPO Overview 3.1](#), section 1.8.

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 disputed domain name resolved to a login page, showing the Complainant's logo and impersonating the Complainant's genuine login page. The Panel neither considers this use a bona fide offering of goods or services nor a legitimate noncommercial or fair use of the disputed domain name in the sense of paragraph 4(c)(i) and (iii) of the Policy. In particular, the Complainant has not authorized or licensed the Respondent to use any of its trademarks in any way.

Furthermore, the Panel does not dispose of any elements that could lead the Panel to the conclusion that the Respondent is commonly known by the disputed domain name or that it has acquired trademark rights pursuant to paragraph 4(c)(ii) of the Policy.

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.

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith, [WIPO Overview 3.1](#), section 3.2.1. One of these circumstances is that the Respondent, by using the disputed domain names, has intentionally attempted to attract, for commercial gain, Internet users to its 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 its website or location or of a product or service on its website or location (paragraph 4(b)(iv) of the Policy).

In the present case, the Panel notes that according to the Complainant's documented allegations the disputed domain name resolved to a login page, showing the Complainant's logo, including a copyright notice in the name of the Complainant, and impersonating the Complainant's genuine login page. For the Panel, it is therefore evident that the Respondent positively knew of the Complainant's trademark and business. Consequently, and in the absence of any evidence to the contrary, the Panel is convinced that the Respondent also knew that the disputed domain name included the Complainant's trademark when it registered it.

In this regard, the further circumstances surrounding the disputed domain name's registration and use confirm the findings that the Respondent has registered and is using the disputed domain name in bad faith:

- (1) the distinctiveness and reputation of the Complainant's trademark which has existed for decades and which is the dominant element of the Complainant's company name;
- (2) the nature of the disputed domain name incorporating the Complainant's trademark identically and with the addition of a term, namely "accounts", which is directly applicable to the Complainant's business;
- (3) the content of the website to which the disputed domain name directs, relating to the Complainant and its business and purportedly imitating the Complainant's login-page;
- (4) a clear absence of rights or legitimate interests coupled with no response for the Respondent's choice of the disputed domain name; and
- (5) the failure of the Respondent to submit a response or to provide any evidence of actual or contemplated good-faith use.

The Panel, for the reasons set out above, also holds that the current passive holding of the disputed domain name does not prevent a finding of bad faith in the circumstances of this case. [WIPO Overview 3.1](#), section 3.3.

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 <accounts-principal.com> be transferred to the Complainant.

/Tobias Malte Müller/

Tobias Malte Müller

Sole Panelist

Date: May 14, 2026