

## **ADMINISTRATIVE PANEL DECISION**

Airbus SAS v. sarles xavier, Jonas BOLI  
Case No. D2026-1358

### **1. The Parties**

The Complainant is Airbus SAS, France, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondents are sarles xavier, France, and Jonas BOLI, Côte d'Ivoire.

### **2. The Domain Names and Registrars**

The disputed domain name <airbuslogistics.com> is registered with NETIM SARL (the “First Registrar”).

The disputed domain name <airbus-operations.com> is registered with Hostinger Operations, UAB (the “Second Registrar”) (collectively 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 30, 2026. On March 31, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On March 31 and April 1, 2026, the Second and First Registrar respectively 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 (Registrant Information not disclosed and contact information in the Complaint. The Center sent an email communication to the Complainant on April 2, 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 domain names are under common control. The Complainant filed an amended Complaint on April 7, 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 Respondents of the Complaint, and the proceedings commenced on April 15, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 5, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondent’s default on May 6, 2026.

The Center appointed Rebecca Slater as the sole panelist in this matter on May 12, 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 is an aerospace company incorporated in France. The Complainant has designed, manufactured and delivered industry-leading commercial aircraft, helicopters, military transports, satellites and launch vehicles for over 50 years.

The Complainant's history dates to the formation of the Airbus Industrie GIE consortium in 1970, and it has since delivered over 13,500 aircraft to airlines worldwide and 12,000 helicopters. The Complainant has a wide global presence in approximately 180 locations across Europe, the Americas, Africa, the Middle East and Asia, with more than 157,000 employees.

The Complainant holds trade mark registrations for AIRBUS in multiple jurisdictions, including German Patent and Trade Mark Office Registration No. 302013069607 (registered December 9, 2014) and International Trade Mark Registration Nos. 1112012 (registered June 24, 2011) and 1247403 (registered June 18, 2014) (the "Trade Mark").

The Complainant's primary domain name is <airbus.com> (registered on May 23, 1995).

The Respondents did not submit a response, and, consequently, little information is known about the Respondents. For reasons explained below, the Respondents are collectively referred to hereafter as "the Respondent", unless it is necessary to refer to them separately.

The disputed domain name <airbus-operations.com> was registered on October 30, 2025. The disputed domain name <airbuslogistics.com> was registered on February 2, 2026. Both disputed domain names currently resolve to registrar parking pages. The Complainant provided evidence that mail exchange ("MX") records are active on both disputed domain names and that both disputed domain names have been used to send phishing emails to at least one of the Complainant's customers.

#### **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 the Trade Mark. The Trade Mark constitutes the most prominent, dominant and distinctive element of each disputed domain name. The addition of the terms "operations" and "logistics" does not dispel the confusing similarity between the disputed domain names and the Trade Mark. In fact, when combined with the well-known Trade Mark, these terms increase the confusing similarity, as the Complainant is the parent organization of the subsidiaries "Airbus Operations GmbH" and "Airbus Logistik GmbH".
- The Respondents have no rights or legitimate interests in the disputed domain names. The Respondents are not affiliated with and have not been authorized by the Complainant to use its name or Trade Mark, and there is no evidence that the Respondents have been commonly known by the disputed domain names. The disputed domain names resolve to registrar parking pages. The disputed domain names have been used to send phishing emails to at least one of the Complainant's customers, and MX records remain active, indicating the disputed domain names are capable of continued use for potentially fraudulent email communication.

- The disputed domain names were registered and are being used in bad faith. The mere registration of domain names confusingly similar to a well-known trade mark creates a presumption of bad faith. The disputed domain names are passively held and have never resolved to active websites. In relation to the factors to be considered in applying the passive holding doctrine, the Trade Mark is well known and distinctive, the Respondents have advanced no explanation or evidence of any contemplated good-faith use, and the Respondents employed a privacy service to hide their identity. The Complainant further argues that the disputed domain names have been used to send phishing emails to at least one of the Complainant's customers by impersonating the Complainant, which constitutes bad faith registration and use.

## **B. Respondents**

The Respondents did not reply to the Complainant's contentions.

## **6. Discussion and Findings**

To succeed, the Complainant must demonstrate that all the elements enumerated in paragraph 4(a) of the Policy have been satisfied, namely:

- the disputed domain names are identical or confusingly similar to a trade mark or service mark in which the Complainant has rights;
- the Respondents have no rights or legitimate interests in respect of the disputed domain names; and
- the disputed domain names have been registered and are being used in bad faith.

The onus of proving these elements is on the Complainant.

### **Consolidation: Multiple Respondents**

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.11.2.

As regards common control, the Panel notes that:

- the Respondents have not contested the Complainant's assertion that the disputed domain names are under common control;
- both disputed domain names target the same individuals as part of a phishing scam;
- the email address associated with the registrant details of the disputed domain name <airbus-operations.com> matches the name of the registrant of the disputed domain name <airbuslogistics.com>; and
- the email address associated with the registrant details of the disputed domain name <airbuslogistics.com> consists of an email address containing the disputed domain name <airbus-operations.com> as follows: "[...][@airbus-operations.com](mailto:[...]@airbus-operations.com)".

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as “the Respondent”) in a single proceeding.

### **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 trade mark and the disputed domain name. [WIPO Overview 3.1](#), section 1.7.

The Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the Trade Mark is recognizable within each disputed domain name. Accordingly, the disputed domain names are confusingly similar to the Trade Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms (here, “operations” and “logistics”) may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain names 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 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 Complainant has not authorized the Respondent to use its registered or unregistered trade marks and there is no evidence that the Respondent is commonly known by the disputed domain names.

The evidence provided by the Complainant (i.e., emails impersonating the Complainant’s employees) indicates that the disputed domain names have been used to perpetrate a fraudulent scheme.

Panels have held that the use of a domain name for illegitimate activity (here, claimed as impersonation/passing off and phishing) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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.

Panels have held that the use of a domain name for illegitimate activity (here, claimed as impersonation/passing off and phishing) constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name 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 names <airbuslogistics.com> and <airbus-operations.com> be transferred to the Complainant.

*/Rebecca Slater/*

**Rebecca Slater**

Sole Panelist

Date: May 18, 2026