

ADMINISTRATIVE PANEL DECISION

Toyota Motor Credit Corporation (“TMCC”) t/a Toyota Financial Services v.
Maria Ayala
Case No. D2026-0854

1. The Parties

The Complainant is Toyota Motor Credit Corporation (“TMCC”) t/a Toyota Financial Services, United States of America (“United States”), represented by Arnold & Porter Kaye Scholer LLP, United States.

The Respondent is Maria Ayala, Colombia.

2. The Domain Name and Registrar

The disputed domain name <pagosftsc.com> is registered with Nicenic International Group Co., Limited (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 26, 2026. On February 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 28, 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 March 2, 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 6, 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 March 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 1, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 15, 2026.

The Center appointed Karen Fong as the sole panelist in this matter on April 21, 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 which trades as Toyota Financial Services or “TFS” is a wholly owned subsidiary of the car manufacturer, Toyota Motor Corporation in Japan. The Complainant is the finance brand for Toyota Motor Corporation in the United States. The Complainant offers retail auto financing, leasing services and vehicle and payment protection products through participating dealers and its subsidiaries. The Complainant’s network services more than 22 million customers in 30 countries.

The Complainant was established in the United States in 1982 and began operations in May 1983. The Complainant offers its services under its name Toyota Financial Services and/or TFS since its commencement. Evidence has been submitted to show reference of the TFS name when referring to the Complainant on its website, mobile app, signage as well as by third parties including the media.

The TFS trade mark is registered in the United States in the name of the Complainant and/or its holding company. These marks include the following:

- United States Trade Mark Registration No. 2274786 for TFS (logo form) registered on August 31, 1999;
- United States Trade Mark Registration No. 3667941 for TFS BUSINESS SOLUTIONS registered on August 11, 2009 with “Business Solutions” disclaimed.

Toyota Motor Corporation also owns trade mark registrations for the mark TOYOTA and its logo comprising a stylized T within an oval (the “T” Logo”) which presumably the Complainant is authorised to use.

The Complainant operates a website at the domain name <pagostfsco.com> which provides information about itself, its goods and services and as an online sales platform for its customers in Colombia. Customers may access this website to view invoicing details and make payments to the Complainant.

The Respondent who appears to be based in Colombia, registered the disputed domain name on August 16, 2025. The disputed domain name resolves to a website which masquerades as the Complainant’s website. It bears the TOYOTA and T Logo branding prominently and the mark TOYOTA FINANCIAL SERVICES. It appears to have the functionality of the Complainant’s website providing the means to collect invoicing information from customers (the “Website”).

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 the disputed domain name is confusingly similar to a trade mark for which it has rights, that the Respondent has no rights or legitimate interests with respect to the disputed domain name, and that the disputed domain name was registered and is being used in bad faith.

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 trade mark and the disputed domain name. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

Based on the available record, the Panel finds the Complainant has shown that it has registered and unregistered rights in the mark TFS (the "Trade Mark") which is a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel notes that the disputed domain name includes a misspelling of the Trade Mark so that instead of TFS, it is "FTS". Common, obvious, or intentional misspellings of a trade mark are considered by panels to be confusingly similar to the relevant mark for the purposes of the first element. [WIPO Overview 3.1](#), section 1.9. The Panel finds the Trade Mark is recognizable within the disputed domain name. Accordingly, under this reasoning, the disputed domain name is also confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

While the addition of the word "pagos" before the misspelled Trade Mark and "co" after the Trade Mark may bear on assessment of the second and third elements, the Panel finds that such additions does not prevent a finding of confusing similarity between the disputed domain name and the Trade Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

Based on the available record, 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 a respondent lacks rights or legitimate interests in a domain name may result in the often impossible 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. 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 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.

Moreover, the nature of the disputed domain name that comprises a misspelling of the Trade Mark is almost identical to the Complainant's website for its Colombian customers. It includes the word "pagos" which is Spanish for "payments" and the Colombian country code, "co". The sole difference between the Complainant's own domain name and the disputed domain name is that the first two letters of the FTS mark have been swapped.

Based on the available record, the Panel finds the second element of the Policy has been established. 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.

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.

In the present case, the Panel notes that the Respondent fully incorporated a misspelling of the Trade Mark and the structure of the disputed domain name is identical to that of the Complainant's own domain name save for the first two letters of the Trade Mark being swapped. This clearly indicates that the Respondent had actual knowledge of and was targeting the Complainant and the Trade Mark when registering the disputed domain name. It is therefore implausible that the Respondent was unaware of the Complainant when he registered the disputed domain name.

In [WIPO Overview 3.1](#), section 3.2.2 states as follows:

"Noting the near instantaneous and global reach of the Internet and search engines, and particularly in circumstances where the complainant's mark is widely known (including in its sector) or highly specific and a respondent cannot credibly claim to have been unaware of the mark (particularly in the case of domainers), panels have been prepared to infer that the respondent knew, or have found that the respondent should have known, that its registration would be identical or confusingly similar to a complainant's mark. Further factors including the nature of the domain name, the chosen top-level domain, any use of the domain name, or any respondent pattern, may obviate a respondent's claim not to have been aware of the complainant's mark."

The fact that there is a clear absence of rights or legitimate interests coupled with the Respondent's choice of the disputed domain name without any explanation is also a significant factor to consider (as stated in [WIPO Overview 3.1](#) section 3.2.1). The disputed domain name falls into the category stated above and the Panel finds that registration is in bad faith.

The Panel also finds that the disputed domain name is being used in bad faith. The Respondent's unauthorised use of the TOYOTA, TOYOTA FINANCIAL SERVICES and the T Logo on the Website and the mimicking of the Complainant's website are clear indications that the Website was designed to mislead users for unlawful purposes. The Website prominently displays the Complainant and its associated company's marks without any prominent and accurate disclosure of the lack of relationship between the Parties. Its overall content and presentation are calculated to give the false impression that it is operated by, connected to, or authorised by the Complainant. From these circumstances, the Panel concludes that the Respondent intentionally attempted to attract Internet users, for commercial gain, by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the Website and the services offered on it.

It is highly likely that Internet users typing the disputed domain name into their browser or encountering it through a search engine would expect to reach a site operated by the Complainant, not the Respondent. Given that the disputed domain name so closely resembles the Complainant's own domain name, the disputed domain name is plainly likely to confuse users seeking the Complainant's official website. The disputed domain name is therefore inherently misleading and likely to cause confusion among Internet users. This is particularly egregious given that the Website could potentially be used to intercept invoicing details from customers and to procure payments from customers under the mistaken belief that the Website belongs to or is associated with the Complainant.

The Panel finds that the Respondent is seeking to exploit the reputation of the Trade Mark in order to mislead Internet users into visiting the Respondent's Website. On the basis of the record, the Panel concludes that the Respondent has intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the Website, within the meaning of paragraph 4(b)(iv) of the Policy.

The Panel therefore finds that the disputed domain name has been registered and is being used in bad faith under paragraph 4(b)(iv) of the Policy.

Based on the available record, the Panel finds the third element of the Policy has been established.

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 <pagosftsc.com> be transferred to the Complainant.

/Karen Fong/

Karen Fong

Sole Panelist

Date: May 13, 2026