

ADMINISTRATIVE PANEL DECISION

Coöperatieve Rabobank U.A. v. Gertrude Van Laagwater
Case No. D2026-0997

1. The Parties

The Complainant is Coöperatieve Rabobank U.A., Netherlands (Kingdom of the), represented by Novagraaf Nederland B.V., Netherlands (Kingdom of the) .

The Respondent is Gertrude Van Laagwater, Netherlands.

2. The Domain Name and Registrar

The disputed domain name <rabofarm.com> is registered with Porkbun LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 9, 2026. On March 9, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 9, 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’s name and address redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 13, 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 March 18, 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 March 19, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 8, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 9, 2026.

The Center appointed Willem J. H. Leppink as the sole panelist in this matter on April 15, 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 undisputed.

The Complainant is a cooperative bank in the Netherlands (Kingdom of the), that began in the late 19th century as a network of rural credit unions founded by farmers who needed fair access to financing. The Complainant is one of the largest financial institutions in the Netherlands (Kingdom of the), and ranks among the leading banking groups worldwide. The Rabobank Group reported total assets of approximately EUR 628 billion and a net profit of EUR 2,7 billion in 2022.

The Complainant owns various trade mark rights in relation to RABO and RABOBANK, including the International registration RABO (word mark), with registration number 920615, registered on December 21, 2006 for goods and services in classes 9, 16, 35, 36 and 38 designating a wide variety of jurisdictions and the International registration RABOBANK (word mark), with registration number 603216, registered on June 2, 1993, for goods and services in class 36 and designating inter alia the European Union.

In addition, the Complainant owned a European Union trade mark registration RABO FARM (word mark), with registration number 012101267, which was registered January 22, 2014, for goods and services in classes 35, 36 and 44, but which has lapsed on August 29, 2023.

The disputed domain name was registered on July 2, 2020 and at the time of the filing the Complaint it resolved to a website which displayed different articles in different languages and covering topics such as cryptocurrency, fitness supplements, gardening, interior design, entrepreneurship, and driving theory exams during the COVID-19 pandemic.

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 disputed domain name incorporates the RABO trademark in its entirety. Moreover, the Respondent has no rights or legitimate interests in respect of the disputed domain name.

The Complainant operates globally under the RABO and RABOBANK trademarks and is widely recognized as a leading agricultural bank. It is therefore inconceivable that the Respondent registered the disputed domain name without knowledge of the Complainant and its trademarks.

Moreover, it follows from the fact that the "*Watch More*" section of the Website to which the disputed domain name resolves, displays an older corporate video produced by the Complainant, that the Respondent is aware of the Complainant and its trademarks. The Respondent deliberately sought to create the impression that the disputed domain name and the associated website were affiliated with, sponsored by, or endorsed by the Complainant.

The website associated with the disputed domain name appears to operate as an AI-created blog. The juxtaposition of unrelated subjects, together with the generic structure and wording of the articles, strongly suggests that the content may have been automatically generated, including through an artificial intelligence tool, and that the website is primarily intended to attract Internet traffic by creating a likelihood of confusion as to source, affiliation or endorsement with the Complainant.

The use and registration of the disputed domain name by the Respondent is in bad faith, as the Respondent should have been aware of the Complainant's trademark rights when registering the disputed domain name in 2020.

By combining the word element "RABO", a distinctive and well-established trademark, with the word element "farm" a term directly tied to Rabobank's agricultural identity, the Respondent is not only taking advantage of the Complainant's trademarks but also exploiting its brand identity and market association. This indicates the Respondent was aware of the Complainant's rights and intentionally sought to create confusion.

The Respondent's conduct is not an isolated incident, but closely mirrors the behavior for which the Respondent has already been found to be in bad faith in the past. The Respondent was previously found to have registered and used a domain name consisting of the name of another well-known bank in bad faith on materially similar facts (see *Bankia SA v Whois Privacy, Private by Design, LLC / Gertrude Van Laagwater*, WIPO Case No. [D2020-2460](#)). This case resulted in adverse findings against the Respondent on bad faith and the transfer of the disputed domain name. Therefore, there is ground to assume that this case is not an isolated act, but a continuation of an earlier identified scheme which supports the above-mentioned arguments.

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 for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the mark is reproduced 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 other terms here, "farm" 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 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.

Although the disputed domain name resolves to a website, the Panel finds that this website does not show any legitimate interest in the registration or use of the disputed domain name. The Panel, certainly lacking a Response, agrees with the Complainant, that the website appears to be an AI-created site with no clear intention or useful purpose.

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.

The Complainant contends, in summary, that it is implausible that the Respondent registered the disputed domain name without knowledge of the Complainant and its mark. The Complainant further submits that the Respondent’s conduct is not an isolated incident, but closely mirrors the behavior for which the Respondent has previously been found to have acted in bad faith. In *Bankia SA v Whois Privacy, Private by Design, LLC / Gertrude Van Laagwater*, WIPO Case No. [D2020-2460](#), the Respondent was found to have registered and used a domain name consisting of the name of another well-known bank in bad faith on materially similar facts.

Based on the record before the Panel, and the circumstances presented by the Complainant, the Panel finds, on a balance of probabilities, that the Respondent must have been aware of the Complainant and its mark at the time of registering the disputed domain name, in particular as the Respondent purports to be residing in the Netherlands (Kingdom of the), given the repute of the Complaint in the Netherlands (Kingdom of the),, including the connection that will be made in the Netherlands (Kingdom of the), between the Complainant and farmers. This is further supported by the fact that the website linked to the disputed domain name displayed an older corporate video produced by the Complainant.

Finally, the Panel takes into consideration that the Respondent clearly seems to be engaged in a pattern of such conduct as it was established in a previous UDRP case, that the Respondent registered, nearly at the same time as the disputed domain name, a domain name corresponding to the name of well-known bank.

The Panel therefore finds that the Respondent registered and is using the disputed domain name in bad faith within the meaning of paragraph 4(a)(iii) of 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 <rabofarm.com> be transferred to the Complainant.

/Willem J. H. Leppink/

Willem J. H. Leppink

Sole Panelist

Date: April 23, 2026