

ADMINISTRATIVE PANEL DECISION

Canadian Imperial Bank of Commerce v. Kishor Patel, ProAdvocacy Canada
and KISHORBHAI PATEL

Case No. D2026-1410

1. The Parties

The Complainant is Canadian Imperial Bank of Commerce, Canada, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondents are Kishor Patel, ProAdvocacy Canada, and KISHORBHAI PATEL, Canada, self-represented.

2. The Domain Names and Registrar

The disputed domain names <cibcgoogle.com> and <cibcindia.com> are registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 2, 2026 only in relation to <cibcindia.com>. On April 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name <cibcindia.com>. On April 2, 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 (Registration Private, Domains by Proxy, LLC, DomainsByProxy.com) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 7, 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 April 17, 2026, adding one supplemental disputed domain name <cibcgoogle.com>. On April 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name <cibcgoogle.com>. On the same day, 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 and contact information in the Complaint.

The Center sent an email communication to the Complainant on April 20, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, 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 21, 2026.

The Center verified that the Complaint together with the amended Complaints 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 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 13, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondent's default on May 15, 2026. The Respondent KISHORBHAI PATEL further sent communications on May 23, 2026.

The Center appointed Christopher J. Pibus as the sole panelist in this matter on May 27, 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 Canadian Imperial Bank of Commerce, or CIBC, is a North American financial institution headquartered at CIBC Square in the Financial District of Toronto, Ontario, Canada. Founded in 1867, the Complainant operates as a full service bank, providing a full range of financial services, including personal and business banking, commercial banking and wealth management, and capital markets and direct financial services. It has 50,000 employees servicing 15 million clients in Canada, the United States of America and around the world. For the year ended October 31, 2025, it reported a total revenue of USD 29.1 billion, with a reported/adjusted net income of USD 8.5 billion.

The Complainant maintains its Internet presence through its primary website "www.cibc.com", which had an average monthly visit of 19.86 million in February 2026, ranking as the 1,458th most popular website in the world and 25th in its industry. The Complainant also maintains social media accounts on Facebook with 412,000 followers, LinkedIn with more than 634,000 followers, and YouTube with more than 30,100 subscribers.

The Complainant maintains a long-standing international portfolio of CIBC-formative trademarks, including registrations for the word mark CIBC in the following jurisdictions:

Canada: Trademark CIBC, registration number TMA350269, registered on January 20, 1989, in classes 9, 14, 16, 28, 34, 35 and 36 ;

United States of America: Trademark CIBC, registration number USPTO 1677002, registered on February 25, 1992, in class 36 ; and

India: Trademark CIBC, registration number 2166820, registered on June 28, 2011, in class 36.

The disputed domain names were registered by an individual named Kishor/Kishorbhai Patel, located in Canada, on the following dates:

<cibcindia.com> - December 5, 2022

<cibcgoogle.com> - November 18, 2022.

The disputed domain names revert to landing pages which promote links to third party websites. The disputed domain name <cibcindia.com> resolves a landing page “the Evolving Landscape of Indian Cinema” with related PPC links, and the disputed domain name <cibcgoogle.com> resolves to a landing page “Marketing cheap flights online with Google ads”.

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.

B. Respondents

The Respondents did not file a formal Response. The Respondent KISHORBHAI PATEL filed a short communication replying to the Complainant’s contentions, after the Response due date. The substantive part of the reply is set out in two sentences: “We completely dispute your claim [D2026–1410](#) against us. Subjected business Bank, Canadian Imperial Bank of Commerce and we at Canadian International Business Corporation (CIBC) are in a complete different business, nothing in common in terms of providing services.” No supporting documents were included with the communication except for certain legal forms connected to unrelated criminal bail proceedings.

6. Discussion and Findings

According to paragraph 4(a) of the Policy, in order to succeed, the Complainant must establish each of the following elements:

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

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 registrants appear to be the same person, with slightly different first names, in terms of spelling: the full name "Kishorbhai Patel" vs the short form "Kishor Patel". The contact particulars (including address) are identical for both registrants, and the response as filed simply identifies the "Respondent's full name" as "Kishorbhai Patel".

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. The Respondents have not raised any objection to consolidation.

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 trademark and the disputed domain name. [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 Panel finds the CIBC mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the CIBC mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms here, "india" and the third-party trademark "google" 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 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 names. The Respondent's reply, by way of contrast, consists only of unsupported declarations denying liability and an unsupported claim to the name Canadian International Business Corporation (for "a complete different business"). There is no evidence showing that the Respondent has ever used that business name or the abbreviation CIBC in Canada or elsewhere.

The Panel notes that the Respondent is not commonly known by the disputed domain names, which evinces a lack of rights or legitimate interests; the Registrar's verification identifies the Respondent of as "Kishor Patel, ProAdvocacy Canada/ KISHORBHAI PATEL". Neither of these names resembles the disputed domain names in any manner.

The Complainant's evidence also establishes that the Respondent is not sponsored by or affiliated with the Complainant in any way, nor has the Complainant given the Respondent a license, authorization or permission to use the Complainant's trademark in any manner, including in domain names.

The Complainant has also provided evidence that the Respondent is using both disputed domain names to redirect users to a GoDaddy-affiliated directory or search portal used for parking domain names. This type of website appears to function similarly to a traditional pay-per-click (PPC) parking page as it serves to monetize parked domain names through user engagement and advertising. Like a traditional pay-per-click parking page, the Respondent presumably receives fees from the automated links and sponsored advertisements on the disputed domain names' "lander" page. Prior UDRP decisions have held that respondents who monetize domain names using links and paths to third-party websites have not made a bona fide offering of goods or services that would give rise to rights or legitimate interests in a disputed domain name. As such, the Panel finds the Respondent is not using the disputed domain names to provide a bona fide offering of goods or services as allowed under, nor a legitimate non-commercial or fair use as allowed under the Policy. See [WIPO Overview 3.1](#), section 2.9.

The Respondent has not rebutted the Complainant's prima facie showing and has not come forward with sufficient evidence demonstrating rights or legitimate interests in the disputed domain names 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.

The Policy provides that bad faith can be established by evidence demonstrating that the Respondent has "intentionally attempted to attract, for commercial gain, Internet users to [Respondent's] website...by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website or location of a product or service on [Respondent's] website or location". See Policy paragraph 4(b)(iv). Here, the Panel finds that the Respondent has created a likelihood of confusion with the Complainant and its trademarks by registering domain names that incorporate the well-known CIBC trademark in its entirety with the addition of terms "india" or the third-party trademark "google", which demonstrates that the Respondent is using the disputed domain names to confuse unsuspecting Internet users looking for the Complainant's services, and to mislead Internet users as to the source of the disputed domain names and websites. By creating this likelihood of confusion, leading to misperceptions as to the source, sponsorship, affiliation, or endorsement of the disputed domain names, the Respondent (who appears to reside in Canada, where the headquarters of the Complainant's business are located) has demonstrated a nefarious intent to capitalize on the fame and goodwill of the CIBC trademark in order to increase traffic to the associated websites for pecuniary gain, as evidenced by its redirection to a "lander" page featuring multiple third-party links. Previous Panels have found bad faith under Policy

paragraph 4(b)(iv) where a respondent uses a confusingly similar domain name to resolve to a website featuring links to third-party websites that create revenue for the respondent. See [WIPO Overview 3.1](#), section 3.5. The disputed domain names can only be taken as intending to cause confusion among Internet users as to source; there is no other plausible good-faith reason or logic which would support a different conclusion and this was not defended by the Respondent

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 <cibcgoogle.com> and <cibcindia.com> be transferred to the Complainant.

This transfer is without prejudice to any rights, which may be asserted by a third-party trademark holder.¹

/Christopher J. Pibus/

Christopher J. Pibus

Sole Panelist

Date: June 10, 2026

¹ The Panel notes that the disputed domain name <cibcgoogle.com> incorporates a third-party trademark. See [WIPO Overview 3.1](#), section 4.13.