

ADMINISTRATIVE PANEL DECISION

EFG Bank European Financial Group SA v. Qiao Qiao, adasdad
Case No. D2026-1491

1. The Parties

The Complainant is EFG Bank European Financial Group SA, Switzerland, represented by CMS Cameron McKenna Nabarro Olswang LLP, United Kingdom.

The Respondent is Qiao Qiao, adasdad, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <efg-finance.com> is 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 10, 2026. On April 10, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 10, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 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 April 14, 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 April 15, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 5, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on May 7, 2026.

The Center appointed Mihaela Maravela as the sole panelist in this matter on May 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

According to information in the Complaint, the Complainant is a regulated bank and the major shareholder of the global private banking and asset management group EFG International AG headquartered in Zurich, Switzerland. The Complainant's business was founded in 1995 and has been using EFG as tradename and brand since 1996 throughout the world. The Complainant is listed on the SIX Swiss Exchange. It operates in more than 20 countries worldwide, has over 3,000 employees and manages CHF 185 billion of client assets (as of December 2025).

The Complainant owns many trademark registrations for EFG, EFG BANK or EFG INTERNATIONAL. The Complainant has also widely used and registered the EFG logo, which includes a distinctive red-colored section of the letter "F". Examples of trademarks registered by the Complainant in the Respondent's jurisdiction include:

- United States Trademark Registration No. 5333483 for EFG (stylized), registered on November 14, 2017, in international class 36;
- United States Trademark Registration No. 5333495 for EFG (stylized), registered on November 14, 2017, in international class 36;
- United States Trademark Registration No. 4354927 for EFG (word), registered on June 18, 2013, in international class 36;

The disputed domain name was registered on January 29, 2025, and at the date of the Complaint, it resolved to a website headed "EFG BANK AG" which prominently featured the Complainant's figurative trademark and offered financial services, copying information from the Complainant's website and asking for log in details consisting of username and password. At the date of this Decision, the disputed domain name is parked at the Registrar and displays a search directory platform.

The Respondent appears to be located in the United States.

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 wholly incorporates the Complainant's trademark EFG, followed by the wholly descriptive and non-distinctive element "finance" in connection with banking and financial services. The disputed domain name is also highly similar to the Complainant's marks EFG INTERNATIONAL and EFG BANK, for which it has both registered and unregistered rights.

With respect to the second element, the Complainant contends that the Respondent has not been authorised by the Complainant to register or use the disputed domain name. Further, the website at the disputed domain name features a login page, incorporating a logo identical to the Complainant's figurative trademark and also prominently mentions "EFG Bank AG", which is one of the Complainant's companies based in Zurich. The Complainant submits that given the mentioned use, there can be no doubt that the Respondent purposefully copied the Complainant's logo and company name, with the knowledge that all intellectual property rights attached to these signs belong to the Complainant. Moreover, the website at the disputed domain name uses a description of its operations which is nearly identical to the Complainant's as used on

its website. The website at the disputed domain name does not contain terms and conditions, nor do they identify any contact details or company names associated with such website, all of which would be expected of a genuine trading platform. The chat function available at the website at the disputed domain name does not resolve.

As regards the third element, the Complainant contends that it has built up a significant reputation in its EFG trademark through extensive use of the mark during trade since 1996 together with a very large international trademark portfolio consisting of more than 150 registrations worldwide that include EFG. The Complainant also enjoys a high degree of consumer recognition. As regards the use, the website at the disputed domain name displays the Complainant's EFG trademark, its logo, and company name. It purports to offer financial services under these signs, and therefore clearly attempts to mislead consumers into believing that the disputed domain name and the website under it are owned and operated by the Complainant, for fraudulent purposes. The Respondent's registration details identify an organisation named "adasdad" at the address "sdasdad55sadasd" in New York in the United States. This information is clearly fabricated and false, further indicating 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

No response has been received from the Respondent in this case. Accordingly, the Panel considers it can proceed to determine the Complaint based on the statements and documents submitted by the Complainant as per paragraph 15(a) of the Rules. The applicable standard of proof in UDRP cases is the "balance of probabilities" or "preponderance of the evidence", and the Panel can draw certain inferences in light of the particular facts and circumstances of the case. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.2. Concerning the uncontested information provided by the Complainant, the Panel may, where relevant, accept the reasonable factual allegations in the Complaint as true. [WIPO Overview 3.1](#), section 4.3.

Even if the Respondent has not replied to the Complainant's contentions, the Complainant still bears the burden of proving that all requirements are fulfilled. To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and (iii) the disputed domain name has been registered and is being used in bad faith.

The Panel has taken note of the [WIPO Overview 3.1](#), and, where appropriate, will decide consistently with the consensus views stated therein.

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 the trademark EFG 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, “finance” and a hyphen) 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. It has also long been held that generic Top-Level Domain (“gTLD”), here “.com”, are generally disregarded when evaluating the confusing similarity between a disputed domain name and a trademark. See section 1.11.1 of the [WIPO Overview 3.1](#).

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.

There is no evidence that the Respondent is using the disputed domain name in connection with a bona fide offering of goods or services, nor does the Respondent appear to engage in any legitimate noncommercial or fair use of the disputed domain name within the meaning of paragraphs 4(c)(i) and (iii) of the Policy. Rather, according to the unrebutted evidence with the Complaint, the disputed domain name resolved to a website featuring the Complainant’s trademark, purporting to offer similar financial services with those of the Complainant, in a manner consistent with deliberate targeting. Such use does not in the circumstances of this case give rise to any rights or legitimate interests on the Respondent’s part.

Panels have held that the use of a domain name for illegal activity (here, claimed passing off, or other types of fraud) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

The Respondent is reportedly called “Qiao Qiao, adasdad” and there is no evidence that the Respondent is commonly known by the disputed domain name within the meaning of paragraph 4(c)(ii) of the Policy.

Furthermore, the Respondent has not formally replied to the Complainant’s contentions, claiming any rights or legitimate interests in the disputed domain name.

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.

According to the un rebutted assertions of the Complainant, its EFG trademarks were widely used in commerce well before the registration of the disputed domain name. The disputed domain name is confusingly similar to the Complainant's trademarks and resolved to a website displaying the Complainant's trademark and logo, purportedly offering similar services to those of the Complainant. Under these circumstances, it is most likely that the Respondent was aware of the Complainant's trademarks at the registration date of the disputed domain name.

As regards the use of the disputed domain name, the Panel accepts the Complainant's evidence, which the Respondent has not disputed, that the Respondent used the disputed domain name to resolve to an impersonating website featuring the Complainant's EFG trademark and logo, in association with financial services virtually identical to those offered by the Complainant. Such use is likely to mislead Internet users looking for the Complainant's products or services. Accordingly, the Panel finds that, by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of its website or of a product or service on its website (paragraph 4(b)(iv) of the Policy).

Panels have held that the use of a domain name for illegal activity (here, claimed passing off, or other types of fraud) 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.

Also, there appears to be a pattern of abusive registrations by the Respondent, as the Respondent was involved in at least one previous UDRP proceeding that the Complainant indicated in its Complaint, and where similar facts caused the concerned UDRP panel to decide in favor of the same complainant (See *EFG Bank European Financial Group SA v. Qiao Qiao, adasdad, and 名王*, WIPO Case No. [D2025-4968](#)). This fact also supports a finding grounded on paragraph 4(b)(ii) of the Policy, referring to a respondent registering "the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct".

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 <efg-finance.com> be transferred to the Complainant.

/Mihaela Maravela/

Mihaela Maravela

Sole Panelist

Date: May 18, 2026