

ADMINISTRATIVE PANEL DECISION

BPCE v. Susan Calahan, James Dover
Case No. D2026-1590

1. The Parties

The Complainant is BPCE, France, represented by KALLIOPE Law Firm, France.

The Respondents are Susan Calahan and James Dover, United States of America.

2. The Domain Names and Registrar

The disputed domain names <verif-banquepop.com> and <verification-banquepop.com> are registered with Hosting Concepts B.V. d/b/a Registrar.eu. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 15, 2026. On April 15, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On April 17, 2026, the Registrar transmitted by email to the Center its verification response confirming that the Respondents are listed as the registrants and providing the contact details.

The Center verified that 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 April 20, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 10, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 12, 2026.

The Center appointed Pablo A. Palazzi as the sole panelist in this matter on May 19, 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, BPCE, is a French joint stock company acting as the central institution responsible for the two banking networks, Banques Populaires and Caisses d'Epargne. BPCE is one of the largest banking groups in France and pursues a full range of banking, financing, and insurance activities, working through its two major Banque Populaire and Caisse d'Epargne cooperative banking networks and through its different subsidiaries. BPCE has put down deep roots in its local markets. Its 105,000 employees serve a total of 36 million customers, 9 million of whom have decided to become cooperative shareholders. BPCE is well known in the banking international market and is present in more than 40 countries via its various subsidiaries.

The Complainant is the owner of the French trademark BANQUE POPULAIRE registered under number 3113485 on July 25, 2001 for services in classes 36 and 38.

In addition, the Complainant owns several domain names incorporating the BANQUE POPULAIRE mark, including <banque-populaire.com> (registered in 1998), <banquepopulaire.com> (registered in 2001), <banque-populaire.fr> and <banquepopulaire.fr> (both registered in 2002), and <banquepopulaire.info> (registered in 2007). These domain names correspond to or redirect to the Complainant's official website.

The disputed domain names <verif-banquepop.com> and <verification-banquepop.com> were registered on March 5, 2026 and March 13, 2026, respectively. The disputed domain names are currently not active. However, according to the Complaint's evidence, both disputed domain names redirected to a fake website featuring a fraudulent login page, which may be used to collect personal data.

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. Respondent

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

6. Discussion and Findings

6.1. 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:

- The disputed domain names were registered with the same Registrar.
- The disputed domain names were registered within a few days of each other.
- The disputed domain names were registered using the same pattern, incorporating the Complainant's mark and prefixing it with the terms "verif" and "verification" and a hyphen.
- Both disputed domain names resolved to a fake website featuring a fraudulent BANQUE POPULAIRE login page.

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.

6.2. Substantive issues

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

Although the addition of other terms "verif" and "verification" may bear on assessment of the second and third elements, the Panel finds the addition of such term[s] 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 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.

Panels have held that the use of a domain name for illegitimate activity, here phishing/identity theft or other types of fraud, 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.

The Panel finds that the Respondent acted in bad faith by registering and using the disputed domain names with full knowledge of the Complainant's prior rights. Given that the trademarks were well-established long before the registration of the disputed domain names in March 2026, and considering the disputed domain names redirected to a fraudulent login page designed to impersonate 'Banque Populaire, it is evident that the Respondent intended to deceive Internet users for illicit gain. Furthermore, the Respondent's failure to contest these allegations (default) allows the Panel to conclude that the disputed domain names were registered specifically to capitalize on the Complainant's reputation through a phishing scheme.

Panels have held that the use of a domain name for illegal activity here, claimed phishing/identity theft 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 names constitute 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 <verif-banquepop.com> and <verification-banquepop.com> be transferred to the Complainant.

/Pablo A. Palazzi/

Pablo A. Palazzi

Sole Panelist

Date: June 2, 2026