

ADMINISTRATIVE PANEL DECISION

African Bank Limited v. Danjuma Sada
Case No. D2026-1618

1. The Parties

The Complainant is African Bank Limited, South Africa, represented by Adams & Adams, South Africa.

The Respondent is Danjuma Sada, Nigeria, self-represented.

2. The Domain Name and Registrar

The disputed domain name <greenafricanbank.com> is registered with Host Africa (Pty.) Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 16, 2026. On April 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 17, 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 (Domain Admin, Privacy Protect, LLC (PrivacyProtect.org)) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 21, 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 22, 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 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 17, 2026. The Response was filed with the Center on May 8 and 16, 2026, respectively.

The Center appointed Kaya Köklü as the sole panelist in this matter on June 2, 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 is a retail bank based in South Africa, offering a wide range of financial services and products since 1975. It operates almost 400 branches in South Africa and offers comprehensive online banking and mobile application services.

The Complainant is the registered owner of the AFRICAN BANK trademark, which is registered in numerous jurisdictions. Among others, the Complainant is the owner of the South Africa Trademark Registration No. 2012/28236, registered on May 18, 2015, and the Botswana Trademark Registration No. 2008/000550, registered on July 23, 2009, both for AFRICAN BANK, covering inter alia financial services as protected in class 36.

The Complainant has owned and operated its official website at the domain name <africanbank.co.za> since 1996.

Panels in previous UDRP cases have found that the trademark AFRICAN BANK is likely to qualify as a well-known trademark in South Africa. *African Bank Limited v. Tang Owen*, WIPO Case No. [D2025-4980](#); and *African Bank Limited v. Shaun Mills*, WIPO Case No. [D2025-4490](#).

The Respondent is reportedly an individual from Nigeria.

The disputed domain name was registered on March 26, 2025. According to the screenshots provided by the Complainant, the disputed domain name resolved to a website displaying Pay-Per-Click (“PPC”) links related to finance and loan services, with one link explicitly related to loans in Africa. At the time of the Decision, the disputed domain name no longer resolves to an active 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.

In particular, the Complainant contends that it has been using the AFRICAN BANK trademark over the past 50 years in South Africa and other countries. The Complainant has also for many years regularly advertised and promoted its offering under the AFRICAN BANK trademark through television and radio, print media and outdoor billboards. The Complainant has a strong social media presence including Facebook, X, and Instagram to extensively promote the products and services provided under its AFRICAN BANK trademark. For example, the Complainant uses Facebook under the profile name “Africanbank” and currently has 421,000 followers, and uses the handle @AfricanBank on X and the profile name “africanbank” on Instagram. It currently has more than 79,000 followers on X and more than 23,000 followers on Instagram. Therefore, the Complainant claims that its AFRICAN BANK trademark is well known.

In addition to its main domain name <africanbank.co.za>, the Complainant has also registered other domain names incorporating its AFRICAN BANK trademark including <african-bank.com>, <africanbank.com>, <african-bank.co.za>, <africanbankcreditcard.co.za>, <africanbank.org.za>, <africanbank.online>, and <africanbanklimited.com>.

B. Respondent

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name.

The Respondent is part of the institution called Denham and Grey Ltd., who are promoters for the establishment of a Green Bank and registered the disputed domain name accordingly on behalf of the institution. The Respondent particularly contends that the disputed domain name was registered in connection with a bona fide and independently developed project to establish a climate-focused financial institution under the name "Green African Bank".

According to the Respondent, the project has been under development for approximately two years prior to the filing of this Complaint and is intended to focus on sustainable finance, climate finance, renewable energy financing, and green development initiatives across Africa.

The Respondent submits that substantial preparations had been undertaken prior to notice of the dispute, including corporate name reservation procedures in Nigeria, feasibility studies, strategic planning, stakeholder engagement, preparation of a five-year institutional strategy, participation in climate-finance and green-banking events, and discussions with development-finance institutions and other stakeholders.

The Respondent argues that these activities demonstrate rights or legitimate interests in the disputed domain name.

The Respondent particularly denies having registered or used the disputed domain name in bad faith. The Respondent asserts that the phrase "Green African Bank" was selected because: a. "Green" describes climate finance and environmentally sustainable banking; b. "African" reflects the intended continental scope and long-term African expansion strategy of the institution; and c. "Bank" describes the intended nature of the institution. The combination of these terms was chosen descriptively and conceptually to reflect the nature and geographic focus of the proposed institution. The Respondent argues that the disputed domain name was not registered to target the Complainant, capitalize on the Complainant's reputation, disrupt the Complainant's business, or mislead consumers. The Respondent further states that the disputed domain name has never been offered for sale to the Complainant or any third party, that no attempt has been made to impersonate the Complainant or use its branding, and that any temporary landing page associated with the disputed domain name should not be regarded as evidence of bad faith.

Also, the Respondent submits that the proposed "Green African Bank" project differs fundamentally from the Complainant's business. Whereas the Complainant operates primarily as a South African retail bank, the Respondent states that the proposed institution is intended to function as a wholesale, development-focused climate-finance entity working through financial intermediaries and development-finance institutions across Africa, and that the name "Green African Bank" was selected because it descriptively reflects the intended purpose and geographic scope of the proposed institution.

The Respondent therefore contends that the Complaint should be denied.

6. Discussion and Findings

According to paragraph 15(a) of the Rules, the Panel shall decide the Complaint in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

In accordance with paragraph 4(a) of the Policy, the Complainant must prove that each of the three following elements is satisfied:

- (i) the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights; and
- (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.

It is stated that the Panel has taken note of the WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”) and, where appropriate, will decide consistently with the consensus views captured 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 AFRICAN BANK trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the AFRICAN BANK 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 “green”, 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 AFRICAN BANK 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 Panel finds that the Respondent has not come forward with convincing evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise. In this regard, the Panel particularly notes the following:

The Respondent asserts that he is part of the institution called Denham and Grey Ltd., who are promoters for the establishment of a Green Bank and the disputed domain name was registered on behalf of this institution and relies on various provided documents allegedly relating to a proposed bank project for climate friendly and sustainable investments. The Respondent has not provided specific evidence establishing the nature of its relationship with the institution. However, the Panel notes that the Respondent copied the Managing Director of the institution in the email of submitting the Response. Further, a law firm prepared a legal opinion in relation to the current proceedings for the Respondent prior to the filing of the Response and the legal opinion was addressed to the Managing Director of the institution. Therefore, the Panel is prepared to infer that the Respondent is in some way related to this institution and the institution was aware of the Respondent's registration of the disputed domain name.

The Panel has reviewed the materials submitted by the Respondent and notes that the institution appears to have a plan to develop a green bank that is designed to mobilize international climate capital, to fund green infrastructure, and to de-risk investments for private sector participation with its initial focus in Nigeria and expansion to pan-African markets. The Panel further notes most documents which are completed and dated were prepared after the registration of the disputed domain name in March 2025, apart from some email communications inviting the institution to participate in a roundtable discussion on "Are Green Banks the Key to Unlocking Climate Finance?". However, none of the provided documents appear to refer to a project explicitly identified as "Green African Bank". According to the pitch deck prepared by the institution and its corporate strategy, it appears that the name "Green Development Bank Ltd" or "D&G Green Bank" was considered. Therefore, the Panel finds while the Respondent repeatedly asserts that the disputed domain name was registered for a specific bank project under the name "Green African Bank", the provided documents do not appear to substantiate that claim.

The Panel further notes that certain agreements provided by the Respondent were submitted either in draft form and do not bear all signatures or other indicia of execution. As such, these materials provide only limited support for the Respondent's assertion that substantial preparations had in fact been already undertaken. Moreover, these documents do not appear to refer to any project specifically identified as "Green African Bank".

In light of the above and the Complainant's established reputation in the AFRICAN BANK mark in South Africa, the previous use of the disputed domain name for a parking page displaying finance-related PPC links, and the absence of any convincing evidence supporting the Respondent's claimed preparations for a bona fide business under the name "Green African Bank", the Panel finds that the Respondent has failed to rebut the Complainant's prima facie case and therefore lacks rights or legitimate interests in the disputed domain name.

Consequently, 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.

In the present case, the Panel notes that the Complainant's AFRICAN BANK trademark has been in use for decades prior to the registration of the disputed domain name and enjoys a significant reputation at least in South Africa. The disputed domain name incorporates the Complainant's AFRICAN BANK mark in its entirety, merely adding the dictionary term "green". The Respondent argues that the disputed domain name was registered for its generic meaning and in connection with a proposed "Green African Bank" project. However, as discussed above, the documentary evidence submitted by the Respondent does not

convincingly support that assertion in the Panel's opinion. As already stated above, none of the submitted materials appears to refer to a project with the name "Green African Bank", certain documents were provided only in draft form, those documents which are dated were apparently prepared after the registration of the disputed domain name, and some documents refer to a considered bank name as "Green Development Bank Ltd" or "D&G Green Bank".

In the absence of persuasive evidence supporting the Respondent's claimed reasons for registration, and taking into account the reputation of the Complainant's AFRICAN BANK trademark, the Panel finds on balance that it is more likely than not that the Respondent had the Complainant and its trademark in mind when registering the disputed domain name.

The Panel therefore concludes that the disputed domain name was registered in bad faith.

As to the use of the disputed domain name in bad faith, the evidence in the record shows that the disputed domain name resolves to a parking page displaying finance-related PPC links. Given the composition of the disputed domain name, which incorporates the Complainant's long used AFRICAN BANK mark in its entirety, the Panel finds that such use was likely to attract Internet users expecting to reach a website associated with the Complainant.

The Respondent has not demonstrated any bona fide use of the disputed domain name corresponding to the alleged "Green African Bank" project. In addition, the Respondent has not provided convincing evidence that the disputed domain name was used in connection with preparations for such a project, although the Panel notes that the institution appears to have a plan to develop a green bank that is designed to mobilize international climate capital, to fund green infrastructure, and to de-risk investments for private sector participation with its initial focus in Nigeria and expansion to pan-African markets but apparently under the name of "Green Development Bank Ltd" or "D&G Green Bank". Instead, the only demonstrated use of the disputed domain name has been the display of sponsored links relating to financial services, a field closely connected to the Complainant's business. In view of the Panel, such use is inconsistent with the Respondent's asserted preparations for a new banking venture under the name "Green African Bank" and does not support the Respondent's claim of a legitimate, independent purpose for the disputed domain name.

Under these circumstances, the Panel finds it more likely than not that the Respondent intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's mark 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 concludes that the disputed domain name was registered and has been used in bad faith.

Consequently, 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 <greenafricanbank.com> be transferred to the Complainant.

/Kaya Köklü/

Kaya Köklü

Sole Panelist

Date: June 16, 2026