ARBITRATION
AND
MEDIATION CENTER

ADMINISTRATIVE PANEL DECISION

Cetera Financial Holdings, Inc. v. Radosław Jabłoński, Host Master, Njalla Okta LLC
Case No. D2026-2862

1. The Parties

The Complainant is Cetera Financial Holdings, Inc., United States of America ("United States"), represented by Pryor Cashman, LLP, United States.

The Respondents are Radosław Jabłoński, Poland, Host Master, Njalla Okta LLC, Saint Kitts and Nevis.

2. The Domain Names and Registrars

The disputed domain name <ceteragroup.org> is registered with Tucows Domains Inc; and the disputed domain name <ceteragroup.pro> is registered with Hostinger Operations, UAB (collectively the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 30, 2026. On July 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 2, and July 3, 2026, respectively, the Registrar transmitted by email to the Center the verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (The RDAP server redacted the value, REDACTED FOR PRIVACY) and contact information in the Complaint.

The Center sent an email communication to the Complainant on July 3, 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 amendment to Complaint on July 6, 2026.

The Center verified that the Complaint together with the amendment to 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 Respondents of the Complaint, and the proceedings commenced on July 13, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 2, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on August 3, 2026.

The Center appointed Manuel Wegrostek as the sole panelist in this matter on August 7, 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 Cetera Financial Holdings, Inc., formed on February 1, 2010, is one of the largest privately held, independent broker-dealer and investment adviser families in the United States, operating through its four independent firms: Cetera Advisors LLC, Cetera Wealth Services, LLC (formerly Cetera Advisor Networks), Cetera Investment Services LLC, and Cetera Financial Specialists LLC, to serve approximately 8,000 independent financial professionals and over 600 financial institutions. Its self-clearing subsidiary, Cetera Investment Services LLC (founded in 1984 and marketed also as Cetera Financial Institutions or Cetera Investors), became an indirect subsidiary in 2010 following the sale of three ING broker-dealers, subsequently expanding its platform and incorporating the wealth management business of Foresters Financial in 2019.

The Complainant is the owner of several trademarks for CETERA (“CETERA Trademark”), CETERA FINANCIAL GROUP (“CETERA FINANCIAL GROUP Trademark”) and C CETERA (“C CETERA Trademark”), including:

- United States Trademark Registration CETERA FINANCIAL GROUP No. 3953295, registered on May 3, 2011;

- United States Trademark Registration CETERA No. 4386541, registered on August 20, 2013;

- United States Trademark Registration C CETERA No. 4386542, registered on August 20, 2013.

The Complainant is also the owner of domain names including the CETERA Trademark, such as the domain name <cetera.com>, registered on October 6, 1997.

The disputed domain name <ceteragroup.org> was registered on January 20, 2026 and <ceteragroup.pro> was registered on February 3, 2026. At the time of the Decision, these disputed domain names both resolved to inactive websites. The Complainant provided evidence that when the Complaint was filed the disputed domain name <ceteragroup.pro> directed to a website prominently displaying the CETERA Trademark and offering investment services just like the Complainant, and the disputed domain name <ceteragroup.org> directed to a website prominently displaying the C CETERA Trademark logo and requiring users to log in.

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.

On the first element of the Policy, the Complainant claims that the disputed domain names are confusingly similar to the CETERA Trademark. The disputed domain names incorporate the Complainant's well-known CETERA Trademark in full. In the disputed domain names, the CETERA Trademark is followed by the term "group". The addition of the term "group" is not sufficient to dispel the confusing similarity between the CETERA Trademark and the disputed domain names. Moreover, the addition of the term "group" adds to the confusing similarity because it suggests that the disputed domain names belong to the Complainant as the Complainant is the holding company of Cetera Financial Group. The applicable Top-Level-Domains ("TLDs"), in this case ".org" and ".pro", may be disregarded for the purposes of assessment under the first element, as it is viewed as a standard registration requirement.

On the second element of the Policy, the Complainant contends that the Respondents have no rights or legitimate interests in respect of the disputed domain names. There is no evidence to suggest that the Respondents are commonly known by the disputed domain names. The Respondents have never been an authorized representative, agent, or licensee of the Complainant nor does the Complainant have any type of business relationship with the Respondents. The Respondents have configured the disputed domain names to direct to website content that specifically targets the Complainant by offering investment services, which is similar to the Complainant's website that promotes the Complainant's investment services, and consumers are therefore likely to believe that the Respondents' websites are associated with or authorized by the Complainant, or are in fact the Complainant's website, when that is not the case, whilst making prominent use of the Complainant's trademarks. The Respondents clearly had the Complainant's trademarks in mind when registering the disputed domain names in order to exploit and profit from those rights. The website content associated with the disputed domain names makes prolific use of the Complainant's trademarks and its C CETERA logo Trademark. All these elements are likely to confuse users into believing that the disputed domain names and the Respondents' websites are operated, approved of, sponsored by, or affiliated with the Complainant, which cannot constitute legitimate or noncommercial fair use under the Policy.

On the third element of the Policy, the Complainant asserts that the Respondents have registered and used the disputed domain names in bad faith. The Complainant's trademarks are highly distinctive and are exclusively associated with the Complainant. The Respondents registered the disputed domain names on January 20, 2026 and February 3, 2026, while the Complainant first used its widely-known CETERA Trademark in the United States commerce at least as early as February 1, 2010. Therefore, there is little doubt that the Respondents registered the disputed domain names with full knowledge of the Complainant's rights in the CETERA Trademark. In addition, the fact that the website at the disputed domain name <ceteragroup.pro> displays the address "1450 American Lane, Schaumburg, Illinois 60173-2096" under the "Contact Us" section of the website, which is an address associated with Cetera Financial Specialists LLC, a wholly-owned subsidiary of Cetera Financial Group, Inc., only strengthens the belief that the Respondents were aware of the Complainant's trademarks while registering the disputed domain names and creating the websites. Moreover, the websites at the disputed domain names purport to offer an investment platform and investment services which are similar to the Complainant's services. The Respondents' websites display the Complainant's well-known CETERA Trademark as well as its C CETERA Trademark. Finally, the website at the disputed domain name <ceteragroup.pro> displayed a fake phone number.

B. Respondent

The Respondents 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 Respondents 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 disputed domain names were registered within a short, two-week period of time, and share the same naming pattern disregarding the TLD. According to the Complainant, the website at disputed domain name <ceteragroup.pro> serves as a gateway to the website at the disputed domain name <ceteragroup.org>. When a user clicks on a link indicated as "Login", "Register Now", or "Start trading" on the website at disputed domain name <ceteragroup.pro>, the user is redirected to the website at the disputed domain name <ceteragroup.org>, where the user is prompted to submit personal information.

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

Paragraph 15(a) of the Rules requires that the Panel's decision be made "on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable".

It has been a consensus view in previous UDRP decisions that a respondent's default (i.e*.,* failure to submit a response) would not by itself mean that the complainant is deemed to have prevailed; a respondent's default is not necessarily an admission that the complainant's claims are true (see section 4.3 of WIPO Overview 3.1).

The Complainant must evidence each of the three elements required by paragraph 4(a) of the Policy in order to succeed on the Complaint with respect to each disputed domain name, namely that:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark 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.

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 applicable TLD in a domain name (e.g., ".com", ".club", ".nyc") is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. WIPO Overview 3.1, section 1.11.1.

The disputed domain names <ceteragroup.org> and <ceteragroup.pro> contain the CETERA Trademark in its entirety, with the only addition of the term "group". The Panel finds the mark is recognizable within the disputed domain names. The addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise), in this case "group", does not prevent a finding of confusing similarity under the first element. WIPO Overview 3.1, section 1.8. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

The Panel finds that the Complainant has established the first element of the Policy.

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.

UDRP panels have found that domain names identical to a complainant's trademark carry a high risk of implied affiliation. Even where a domain name consists of a trademark plus an additional term (at the second- or top-level), UDRP panels have largely held that such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. WIPO Overview 3.1, section 2.5.1.

The Complainant has not authorized, licensed, or permitted the Respondent to register or use the disputed domain names, to use the CETERA Trademark or any other named trademark. The Panel finds that there are no indications on record that the Respondent is commonly known by the disputed domain names or otherwise has any rights or legitimate interests in the disputed domain names. Further, the disputed domain names are not used for a bona fide offering of goods or services. Rather, the Complainant has provided evidence showing that the disputed domain name <ceteragroup.pro> directed to a website prominently displaying the CETERA Trademark and purporting to offer investment services just like the Complainant's official website, and the disputed domain name <ceteragroup.org> directed to a website prominently displaying the C CETERA Trademark and requiring users to log in.

The websites linked to the disputed domain names do not accurately and prominently disclose the relationship, or rather the lack thereof, between the Respondent and the Complainant, thus creating the false impression that the Respondent might be an official and/or authorized provider for the Complainant's service. This assessment is further supported by the nature of the disputed domain names, which in view of the Panel carries a risk of implied affiliation or association, as stated in section 2.5.1 of the WIPO Overview 3.1.

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.

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.

Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith.

Panels have moreover found the following types of evidence to support a finding that a respondent has registered a domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the complainant's mark: (i) actual confusion, (ii) seeking to cause confusion (including by technical means beyond the domain name itself) for the respondent's commercial benefit, even if unsuccessful, (iii) the lack of a respondent's own rights to or legitimate interests in a domain name, (iv) redirecting the domain name to a different respondent-owned website, even where such website contains a disclaimer, (v) redirecting the domain name to the complainant's (or a competitor's) website, and (vi) absence of any conceivable good faith use. WIPO Overview 3.1, section 3.1.4.

Further, 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 disputed domain names incorporate the CETERA Trademark in its entirety, and the CETERA Trademark was registered years before the registration of the disputed domain names. Considering the distinctiveness and reputation of the well-known CETERA Trademark, Internet users may think the disputed domain names are connected to the Complainant and would resolve to a website related to the Complainant because the descriptive term "group" falsely suggests that the disputed domain names belong to the Complainant as the Complainant is the holding company of Cetera Financial Group. Further, the Complainant has provided evidence showing that the disputed domain name <ceteragroup.pro> directed to an active website prominently displaying the CETERA Trademark and purporting to offer investment services just like the Complainant. In addition, the fact that the website at the disputed domain name <ceteragroup.pro> displays the address "1450 American Lane, Schaumburg, Illinois 60173-2096" under the "Contact Us" section of the website, which is an address associated with Cetera Financial Specialists LLC, a wholly-owned subsidiary of Cetera Financial Group, Inc., only strengthens the belief that the Respondent was aware of the Complainant's trademarks while registering the disputed domain names and creating the websites.

The disputed domain name <ceteragroup.org> directed to a website prominently displaying the C CETERA Trademark logo and requiring users to log in. Finally, the websites at the disputed domain names do not accurately and prominently disclose the relationship, or rather the lack thereof, between the Respondent and the Complainant.

The Panel finds that the Respondent has intentionally tried to attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant and its CETERA mark as to the source, sponsorship, affiliation or endorsement of the Respondent's websites. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitutes 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 <ceteragroup.org> and <ceteragroup.pro> be transferred to the Complainant.

/Manuel Wegrostek/
Manuel Wegrostek
Sole Panelist
Date: August 21, 2026