

ADMINISTRATIVE PANEL DECISION

Rothschild & Co Continuation Holdings A.G. v. Laurent Arrows, five arrows,
Name Redacted

Case No. D2026-3143

1. The Parties

The Complainant is Rothschild & Co Continuation Holdings A.G., Switzerland, represented by Freshfields LLP, United Kingdom.

The Respondents are Laurent Arrows, five arrows, Name Redacted¹, France.

2. The Domain Name and Registrar

The disputed domain names <fivearrows-gestion.com> (the “First disputed domain name”), <fivearrowsmanagers.com> (the “Second disputed domain name”), and <fivearrows-rothschild.com> (the “Third disputed domain name”) are registered with Squarespace Domains LLC (the “Registrar”).

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on July 16, 2026. On July 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 17, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 24, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaints 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 in English on July 29, 2026.

¹ The Respondent appears to have used the name of a third party when registering the Third disputed domain name. In light of the potential identity theft, the Panel has redacted the Respondent's name from this Decision. However, the Panel has attached as Annex 1 to this Decision an instruction to the Registrar regarding transfer of the Third disputed domain name, which includes the name of the Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding, and has indicated Annex 1 to this Decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

On July 24, 2026, the Center informed the parties in French and English, that the language of the registration agreement for the Second disputed domain name is French, whereas the language of the registration agreement for the First and Third disputed domain names is English. On July 29, 2026, the Complainant confirmed its request that English be the language of the proceeding. The Respondents did not submit any comment on the Complainant's submission.

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 Respondents of the Complaint, and the proceedings commenced on July 30, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 19, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on August 20, 2026.

The Center appointed Wilson Pinheiro Jabur as the sole panelist in this matter on September 9, 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 part of the Rothschild & Co group which has been a provider of financial services for over two hundred years under names containing ROTHSCILD & CO and ROTHSCILD. The Complainant's official website is available at "www.rothschildandco.com".

One of the Complainant's group businesses is the Five Arrows, an alternative assets arm of the Rothschild & Co group (the "Five Arrows Business"), with global assets under management in excess of EUR 29 billion, and in relation to which services are provided under the FIVE ARROWS trademark.

The Complainant is the owner, amongst others, of the following trademark registrations:

- European Union Trademark Registration No. 000206458 for the word mark ROTHSCILD registered on October 8, 1998, successively renewed, in class 14;
- European Union Trademark Registration No. 000206425 for the word mark FIVE ARROWS, registered on October 8, 1998, successively renewed, in classes 14, 35 and 36; and
- European Union Trademark Registration No. 015225601 for the figurative mark  comprising five arrows, registered on July 11, 2016, successively renewed, in class 36.

The First disputed domain name was registered on June 11, 2026, and presently resolves to a parked webpage of the Registrar. . The Complainant has provided evidence that fraudulent e-mails associated with the First disputed domain name were sent impersonating the Complainant (Annex 7 to the Complaint).

The Second disputed domain name was registered on June 9, 2026, and presently does not resolve to an active webpage. In the past, the Second disputed domain name was used in connection with a website almost identical to the section of the Complainant's official website that describes the Five Arrows Business (Annex 6 to the Complaint).

The Third disputed domain name was registered on June 11, 2026, and presently resolves to a parked webpage of the Registrar. Fraudulent e-mails associated with the Third disputed domain name were sent impersonating the Complainant (Annex 7 to the Complaint).

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.

Notably, the Complainant contends that its FIVE ARROWS trademark and name is significant to the heritage of the Rothschild & Co group, given that it represents the five sons of Mayer Amschel Rothschild, the founder of the banking business of the Rothschild family, being the Five Arrows central to the crest of the Rothschild family, also being featured in one of the logos of the Rothschild & Co group.

The Complainant further contends to having invested substantial sums of money in developing and marketing its services under the ROTHSCHILD and FIVE ARROWS trademarks, having spent substantial time, effort, and money advertising and promoting these marks thus having developed substantial goodwill and presently enjoying widespread consumer recognition.

The Complainant contends that the disputed domain names are subject to common control and the consolidation of multiple Respondents would be fair and equitable to all Parties given that all disputed domain names: (i) have been registered with the same registrar; (ii) within a period of two days; (iii) share the same naming structure; and (iv) share similar false registrant details (the address indicated in relation to the First disputed domain name being that of the Complainant; and the name indicated as the registrant for the Third disputed domain name is that of an employee of the Complainant, who suffered an identity theft perpetrated by actual owner of the disputed domain names).

According to the Complainant, the disputed domain names incorporate the Complainant's FIVE ARROWS trademark in its entirety; the addition of the descriptive terms "gestion" and "managers", hyphens and of the ROTHSCHILD trademark, does not prevent a finding of confusing similarity thereof.

As to the absence of rights or legitimate interests, the Complainant argues that:

- (i) there is no relationship between the Respondents and the Complainant;
- (ii) neither FIVE ARROWS nor ROTHSCHILD are descriptive terms and the Complainant has not licensed or otherwise permitted the Respondents to use the FIVE ARROWS nor ROTHSCHILD trademarks, or to register domain names incorporating any of them;
- (iii) the Respondents are not customers of the Complainant or vice versa;
- (iv) the Respondents have not been commonly known by the disputed domain names; and
- (v) the disputed domain names have not been used in connection with a bona fide offering of goods or services rather having the Second disputed domain name hosted a website almost identical to the section of the Complainant's official website that describes the Five Arrows Business.

In what it relates to the bad faith registration and use of the disputed domain names, the Complainant asserts that the Respondents were fully aware of the Complainant and its trademarks at the time of registration of the disputed domain names as shown by the use made of the Second disputed domain name in an attempt to impersonate the Complainant and defraud its customers, as well as by the use of the First and Third disputed domain names in connection with fraudulent e-mails impersonating the Complainant.

B. Respondents

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

6. Discussion and Findings

6.1. Procedural Matter – Language of the Proceeding

The language of the Registration Agreement for the First and Third disputed domain names is English whereas the language of the Registration Agreement for the Second disputed domain name is French. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English. The Complainant requested that the language of the proceeding be English given that it would be disproportionate and inconsistent to require part of the proceedings to be conducted in French and part in English.

The Respondents did not make any specific submissions with respect to the language of the proceeding.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs (see WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.5.1).

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

6.2 Procedural matter – Consolidation of Multiple Respondents

The amended Complaint was filed in relation to nominally different disputed domain name registrants. The Complainant alleges that the disputed domain names are 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 3.1](#), section 4.11.2.

As regards common control, the Panel notes, as seen above, that all disputed domain names: (i) entirely incorporate the Complainant's FIVE ARROWS trademark; (ii) were registered within a period of two days; (iii) two out of three of the disputed domain names were used in connection with a fraudulent email scheme impersonating the Complainant; and (v) share similar false registrant details.

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.

6.3 Substantive matter

Paragraph 4(a) of the Policy sets forth the following three requirements which the Complainant must meet in order for the Panel to order the transfer of the disputed domain names:

- (i) the disputed domain names are 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 names; and
- (iii) the disputed domain names have been registered and are 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 Panel finds the FIVE ARROWS 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, here “gestion”, “managers”, hyphens and of the ROTHSCILD mark of the Complainant, 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 names and the FIVE ARROWS 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.

The Respondent, in not responding to the Complaint, has failed to invoke any of the circumstances, which could demonstrate, pursuant to paragraph 4(c) of the Policy, any rights or legitimate interests in the disputed domain names. This entitles the Panel to draw any inferences from such default as it considers appropriate, pursuant to paragraph 14(b) of the Rules. Nevertheless, the burden of proof is still on the Complainant to make at least a prima facie case against the Respondent under the second UDRP element.

In that sense, the Panel notes that the Complainant has made out a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names, indeed stating that it has not licensed or otherwise permitted the Respondent to use the FIVE ARROWS nor ROTHSCCHILD trademarks, or to register domain names incorporating any of them.

Also, the lack of evidence of the Respondent being commonly known by the disputed domain names and the absence of any trademarks registered by the Respondent corresponding to the disputed domain names, as well as the apparent identity theft associated with one of the disputed domain names, corroborates the indication of an absence of rights or legitimate interests in the disputed domain names.

The composition of the disputed domain names carries a risk of implied affiliation with the Complainant. [WIPO Overview 3.1](#), section 2.5.1. Also, according to the evidence submitted by the Complainant, the disputed domain names were used in connection with a previous copycat website and fraudulent emails impersonating the Complainant, to suggest at least an affiliation with the Complainant which in fact does not exist.

In addition, panels have held that the use of a domain name for illegitimate activity here, claimed as phishing/identity theft, 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.

Therefore, the Panel finds that the Respondent lacks rights or legitimate interests in the disputed domain names. The second element of the Policy has also been met.

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 registration and use of the disputed domain names in bad faith can be found in the present case in view of the following circumstances:

- (i) the Respondent has provided no evidence whatsoever of any actual or contemplated good faith use of the disputed domain names, not having submitted a response;
- (ii) the well-known status of the Complainant's trademarks;
- (iii) the nature of the disputed domain names (reproducing the entirety of the Complainant's FIVE ARROWS, and, as regard to the Third disputed domain name, the ROTHSCCHILD trademarks and different generic terms);
- (iv) the Respondent's use of the disputed domain names in connection with either fraudulent email schemes, or for a copycat website, both uses impersonating the Complainant; and
- (v) the indication of what appears to be false or incomplete contact information, in particular the apparent identity theft associated with the registration details of one of the disputed domain names.

Panels have held that the use of a domain name for illegitimate activity here, claimed as phishing/identity theft, 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.

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 <fivearrows-gestion.com>, <fivearrowsmanagers.com> and <fivearrows-rothschild.com> be transferred to the Complainant.

/Wilson Pinheiro Jabur/

Wilson Pinheiro Jabur

Sole Panelist

Date: September 15, 2026