

## **ADMINISTRATIVE PANEL DECISION**

American Airlines, Inc. v. Juanita Caceres, American Airline  
Case No. D2026-3564

### **1. The Parties**

Complainant is American Airlines, Inc., United States of America ("U.S." or "United States"), represented by Greenberg Traurig, LLP, U.S.

Respondent is Juanita Caceres, American Airline, U.S.

### **2. The Domain Name and Registrar**

The disputed domain name <employeesamericanairlines.com> (the "Domain Name") is registered with Squarespace Domains II LLC (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 11, 2026. On August 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On the same day, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Redacted for Privacy, American Airline) and contact information in the Complaint. The Center sent an email communication to Complainant on August 14, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on August 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 Respondent of the Complaint, and the proceedings commenced on August 18, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 7, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on September 10, 2026.

The Center appointed Harrie R. Samaras as the sole panelist in this matter on September 14, 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**

Complainant is a well-known international air carrier. It and its affiliates serve over 350 destinations in over 50 countries, with nearly 7,000 daily flights. Complainant is headquartered in Fort Worth, Texas where its main hub, Dallas/Fort Worth International Airport is located, and it employs nearly 140,000 individuals.

For many decades, Complainant has used the AMERICAN AIRLINES Mark (or the “Mark”) in connection with a variety of services including, travel and transportation, travel agency, and travel reservation. Complainant owns many trademark registrations for the Mark including U.S. Trademark Registration Nos. 514,294 (registered August 23, 1949), and 1,845,693 (registered July 19, 1994).

Complainant also owns and uses a variety of domain names including <aa.com> and <americanairlines.com>, which redirects to <aa.com> where Complainant’s primary website is hosted (“Complainant’s Website”). That website was created in April 1998 and it has been continuously used in commerce since that date. Among other things, that website has a section for Complainant’s employees providing information and resources for them, including information about their health insurance, tax guidance, and other employee benefits. The employee section of Complainant’s website also enables Complainant’s employees to sign up for health insurance and make changes to their policies and other benefits.

Complainant is also active on social media with over 2.7 million followers on Facebook and 1.6 million followers on X (previously known as “Twitter”).

The Domain Name was registered on October 14, 2025. It resolved to a page stating “We’re under construction. Please check back for an update soon” (the “Website”). The Domain Name had active Mail Exchange (“MX”) records, until December 2025 when the Registrar suspended the Domain Name and put it into a “clientHold” status.

#### **5. Parties’ Contentions**

##### **A. Complainant**

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name. Notably, Complainant contends that the Domain Name incorporates the Mark in full, adding the generic term “employees” at the beginning, which directly describes Complainant’s workforce and business operations and, thus, increases the likelihood of confusion. Notably, the Domain Name is also highly similar to the domain name <americanairlines.com>, which has been registered with Complainant since April 1998 and redirects to Complainant’s Website at the domain name <aa.com>, with the only difference being the additional term “employees.”

Respondent is not commonly known by the Domain Name. The relevant Whois information identified the registrant organization of the Domain Name as “Juanita Caceres /American Airline (note the missing “s”). Respondent’s use of false contact information in registering the Domain Name leads to the conclusion that Respondent is not commonly known by the Domain Name. Furthermore, Respondent has not used or prepared to use the Domain Name in connection with a bona fide offering of goods or services, and has not been authorized, licensed, or otherwise permitted by Complainant to register and/or use the Domain Name. There are no prior trademark applications or registrations in Respondent’s name

for any mark incorporating the Mark anywhere in the world. The Domain Name resolves to a parked page described above and, thus, Respondent is not using the Domain Name for a bona fide offering of goods or services.

The Domain Name resolves to the Website, which is a passive holding of the Domain Name. That constitutes bad faith here because: the Mark has a strong reputation and it is used worldwide; and Respondent may be using the Domain Name in bad faith with respect to certain section of the public specifically authorized to view content on the Website or in email addresses based on the Domain Name. Also, according to the Whois information, and the information provided to Complainant by the Registrar, the name of the registrant of the Domain Name is "Juanita Caceres /American Airline" (note the missing "s") with a purported location at Complainant's corporate address. No one named "Juanita Caceres" is employed by Complainant and registered the Domain Name in the name of Complainant. If such a person existed, "American Airlines" would have been spelled correctly. Moreover, Complainant's preferred domain name registrar is CSC Corporate Domains, Inc., and not Squarespace Domains II LLC.

Also, Respondent had constructive knowledge of the registrations for the Mark. The Domain Name is so obviously connected with Complainant and its services that its very use by someone with no connection to Complainant suggests opportunistic bad faith.

As mentioned above, the Domain Name had active MX records, until December 2025 when the Registrar suspended the Domain Name and put it into clientHold status. Those MX records indicate that the Domain Name was used for email, which evidences a likelihood of additional bad-faith use of the Domain Name to engage in fraudulent email or phishing communications. By putting the Domain Name into a clientHold status, this suggests that the Registrar also determined that it was being used for abusive purposes and is further evidence of bad faith registration and use.

## **B. Respondent**

Respondent did not reply to Complainant's contentions.

## **6. Discussion and Findings**

### **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 of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 1.7.

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 entirety of the Mark is reproduced within the Domain Name. Accordingly, it 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, "employees" 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 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 Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Domain Name. Respondent has not rebutted Complainant’s prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the Domain Name 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.

In the present case, the Panel notes that Respondent registered the Domain Name: (1) incorporating a well-known mark and adding to it the descriptive word “employees” that calls attention to Complainant’s workforce and business operations; (2) many years after Complainant established an international reputation using the Mark in conjunction with its travel services; (3) without any rights or legitimate interests in it; (4) which is similar to Complainant’s domain name <americanairlines.com> and then simply added the non-distinctive term “employees”; and (5) using the name of an individual unrelated to Complainant followed by a misspelling of Complainant’s AMERICAN AIRLINES Mark as well as using Complainant’s corporate address. On the basis of this evidence, it is more likely than not that Respondent registered the Domain Name knowing of Complainant and its rights in the Mark and, thus, 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.

Panels have found that the non-use of a domain name (including a blank or “coming soon” page) would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the reputation of Complainant and of its AMERICAN AIRLINES Mark, and the composition of the Domain Name, and finds that in the circumstances of this case the passive holding of the Domain Name does not prevent a finding of bad faith under the Policy.

The Panel further notes, as mentioned above, that the Domain Name had active MX records until December 2025, when the Registrar suspended the Domain Name and put it into clientHold status. Although Complainant has not provided any evidence of actual use for emails, those MX records indicate that the Domain Name could potentially be used to engage in fraudulent email or phishing communications.

The Respondent's failure to come forward to provide an explanation for the registration and use of the Domain Name further supports this finding.

The Panel finds that 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 Domain Name <employeesamericanairlines.com> be transferred to Complainant.

*/Harrie R. Samaras/*

**Harrie R. Samaras**

Sole Panelist

Date: September 21, 2026