

ADMINISTRATIVE PANEL DECISION

CREDIT AGRICOLE S.A. v. Marion Lelay

Case No. DCO2025-0096

1. The Parties

The Complainant is CREDIT AGRICOLE S.A., France, represented by Nameshield, France.

The Respondent is Marion Lelay, France.

2. The Domain Name and Registrar

The disputed domain name <ca-illeetvilaine.co> is registered with Key-Systems GmbH (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 17, 2025. On November 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 21, 2025, 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 (NOT IDENTIFIED) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 25, 2025, 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 the same day.

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 November 26, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 16, 2025. The Respondent sent an email communication to the Center on November 25, 2025. On December 17, 2025, the Center commenced the panel appointment process.

The Center appointed Elise Dufour as the sole panelist in this matter on December 24, 2025. 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 one of the leading retail banking group in France and one of the largest banking groups in Europe.

The Complainant provides comprehensive banking and financial services to individual, professional, corporate and institutional clients in France and internationally. Its activities cover, *inter alia*, retail and commercial banking, insurance, asset and wealth management, leasing and factoring, consumer credit, as well as corporate and investment banking.

The Complainant is the owner of numerous trademarks incorporating the sign “CA”, which has been used for several decades as a distinctive identifier of the Crédit Agricole group, including in particular :

- The French trademark CA No. 1381908, registered on May 1, 1987, for goods and services in International Classes 16, 35, 36, 37, 38, 39, 40, and 41;
- The French trademark CA No. 3454608, registered on March 9, 2007, for goods and services in International Classes 9, 16, 35, 36, 38, and 42 ;
- The International trademark CA No. 933604, registered on March 23, 2007, for goods and services in International Classes 9, 16, 35, 36, 38, and 42;
- European Union trademark CA No. 12289071, registered on April 11, 2014, for goods and services in International Classes 9, 16, 35, 36, 38, and 42.

In addition to its trademark portfolio, the Complainant owns and operates numerous domain names incorporating the CA trademark, including the domain name <ca-illeetvilaine.com>, registered on April 19, 2002, which corresponds to one of its regional banking entities.

The disputed domain name was registered on June 26, 2024.

At the time of the filing of the complaint :

- the disputed domain name resolves to an inactive parking page,
- MX servers are configured, enabling email functionality.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied all three elements required under paragraph 4(a) of the Policy and that the disputed domain name should therefore be transferred to it.

First, the Complainant submits that the disputed domain name is confusingly similar to its well-known trademark CA. The disputed domain name wholly incorporates the Complainant's trademark CA, which constitutes the dominant and distinctive element of the disputed domain name. The mere addition of the geographical term “illetvilaine” does not dispel the risk of confusion. On the contrary, the Complainant argues that this term directly refers to one of its regional banking entities, namely Crédit Agricole d'Ille-et-Vilaine, and therefore reinforces the false impression that the disputed domain name is officially connected to, or endorsed by, the Complainant. The Complainant further submits that the countrycode Top-Level Domain (“ccTLD”) “.co” is a standard registration requirement and is irrelevant for the purpose of assessing confusing similarity.

Second, the Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent is not commonly known by the disputed domain name and does not hold any trademark or other rights in the designation "CA". The Complainant has never authorized, licensed, or otherwise permitted the Respondent to use its trademark or to register any domain name incorporating the CA mark. The disputed domain name resolves to an inactive parking page and is not used in connection with any bona fide offering of goods or services, nor for any legitimate non-commercial or fair use. According to the Complainant, the mere passive holding of the disputed domain name, particularly where it incorporates a well-known banking trademark, cannot give rise to any rights or legitimate interests.

Third, the Complainant contends that the disputed domain name was registered and is being used in bad faith. Given the longstanding reputation and widespread recognition of the CA trademark in France and in the banking sector, the Complainant submits that the Respondent could not reasonably have been unaware of the Complainant's rights at the time of registration. The Complainant further emphasizes that the configuration of active MX records indicates that the disputed domain name is technically capable of being used for email communications, which creates a significant risk of phishing, impersonation or other fraudulent activities, particularly in the financial services context.

According to the Complainant, there is no plausible good-faith use of the disputed domain name that would not infringe its trademark rights. The Complainant therefore submits that the circumstances of this case, including the passive holding of the disputed domain name combined with its composition and technical configuration, constitute evidence of bad faith registration and use within the meaning of paragraph 4(a)(iii) of the Policy.

B. Respondent

The Respondent did not submit a formal Response addressing the Complainant's contentions under the Policy. The Respondent sent an email communication to the Center in which it acknowledged receipt of the registrant information and indicated an intention to maintain a request for deletion of the disputed domain name.

The Respondent did not, however, provide any arguments or evidence demonstrating rights or legitimate interests in the disputed domain name, nor did it contest the Complainant's assertions regarding confusing similarity or bad faith registration and use.

6. Discussion and Findings

A. Identical or Confusingly Similar

It is well accepted that the first element of the Policy 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, without consideration of the Respondent's intent or use of the domain name. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

In the present case, the Panel finds that the Complainant has demonstrated rights in the trademark CA for the purposes of the Policy. The Complainant holds multiple registrations for the CA trademark in France, in the European Union and internationally, predating the registration of the disputed domain name. The existence of these registered rights satisfies the requirement of paragraph 4(a)(i) of the Policy ([WIPO Overview 3.0](#), section 1.2.1).

The disputed domain name reproduces the Complainant's trademark CA in its entirety.. Where a domain name wholly incorporates a complainant's trademark, UDRP panels have consistently found that such incorporation is sufficient to establish confusing similarity for the purposes of the Policy ([WIPO Overview 3.0](#), section 1.7).

The addition of the geographical term “illeetvilaine” does not prevent a finding of confusing similarity. While the presence of additional terms may be relevant to the assessment of the second and third elements of the Policy, it does not dispel confusing similarity under the first element. In the circumstances of this case, the term “illeetvilaine” directly refers to the Complainant’s regional banking entity Crédit Agricole d’Ille-et-Vilaine. ([WIPO Overview 3.0](#), section 1.8).

The ccTLD “.co” is disregarded for the purpose of the confusing similarity assessment, as it is a technical requirement of domain name registration ([WIPO Overview 3.0](#), section 1.11.1).

Accordingly, the Panel finds that the disputed domain name is confusingly similar to a trademark in which the Complainant has rights and that the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy sets out a non-exhaustive list of circumstances in which a respondent may demonstrate rights or legitimate interests in a disputed domain name.

While the overall burden of proof under the Policy rests with the complainant, UDRP panels have long recognized the inherent difficulty for a complainant to prove a negative, namely that a respondent lacks rights or legitimate interests in a domain name. Accordingly, where a complainant establishes a *prima facie* case that the respondent has no rights or legitimate interests, the burden of production shifts to the respondent to come forward with relevant evidence demonstrating such rights or legitimate interests. If the respondent fails to do so, the complainant is deemed to have satisfied the second element of the Policy ([WIPO Overview 3.0](#), section 2.1).

In the present case, the Panel finds that the Complainant has established a *prima facie* case that the Respondent lacks rights or legitimate interests in the disputed domain name. The Complainant has shown that the Respondent is not affiliated with the Complainant in any way, has not been authorized, licensed, or otherwise permitted to use the Complainant’s CA trademark, and does not hold any trademark or other rights in the designation “CA”.

There is no evidence in the record that the Respondent has been commonly known by the disputed domain name, within the meaning of paragraph 4(c)(ii) of the Policy, nor that the Respondent has made any use or demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy. The disputed domain name resolves to an inactive parking page and does not support any legitimate commercial or non-commercial activity.

The Panel further notes that the Respondent did not submit a substantive Response addressing the Complainant’s contentions under the Policy. Instead, the Respondent limited its communication to an acknowledgment of the registrant information and expressed an intention to have the disputed domain name deleted. The Respondent did not provide any argument or evidence capable of demonstrating rights or legitimate interests in the disputed domain name. Panels have consistently held that a respondent’s failure to rebut a complainant’s *prima facie* case, including where the respondent merely requests deletion or otherwise declines to contest the complaint, may support a finding that the respondent lacks rights or legitimate interests.

In these circumstances, the Panel finds that the Respondent has failed to rebut the Complainant’s *prima facie* case and has not established any of the circumstances set out in paragraph 4(c) of the Policy, nor any other basis for claiming rights or legitimate interests in the disputed domain name.

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name and that 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 finds that the disputed domain name was registered and is being used in bad faith. The disputed domain name wholly incorporates the Complainant's well-known trademark CA, combined with the geographical term "illeetvilaine", which directly refers to one of the Complainant's regional banking entities which reinforces the likelihood of confusion and Internet users will perceive the disputed domain name as being associated with, or endorsed by, the Complainant. Given the longstanding reputation of the CA trademark in France, particularly in the banking and financial services sector, the Panel considers it implausible that the Respondent was unaware of the Complainant and its rights at the time of registration.

At the time of this Decision, the disputed domain name resolves to an inactive parking page. However, panels have consistently held that the non-use of a domain name, including passive holding, does not prevent a finding of bad faith where the circumstances of the case indicate that the disputed domain name was registered with a bad faith intent ([WIPO Overview 3.0](#), section 3.3).

Furthermore, the Panel attaches particular importance to the fact that MX servers are configured for the disputed domain name. The activation of MX records demonstrates that the disputed domain name is technically capable of being used for email communications. In the context of a domain name incorporating a well-known banking trademark, such configuration creates a serious risk of email-based impersonation, phishing, or other fraudulent schemes. UDRP panels have repeatedly found that the presence of active MX records, in the absence of any plausible good-faith use, constitutes a strong indicium of bad faith, as it is difficult to conceive of any legitimate email use of a domain name that so clearly targets a complainant's trademark.

Moreover, there is no evidence in the record of any actual or contemplated good-faith use of the disputed domain name by the Respondent. On the contrary, the composition of the disputed domain name, its lack of active website content, and its technical configuration collectively support the conclusion that the disputed domain name was registered for abusive purposes, or at the very least with knowledge of the Complainant's rights and without any legitimate intent.

The Panel further notes that the Respondent did not provide any substantive explanation for the registration of the disputed domain name and did not attempt to demonstrate any good-faith use. Instead, the Respondent merely requested the deletion of the disputed domain name. Panels have consistently held that such conduct does not negate a finding of bad faith, particularly where the Complainant has requested transfer and the circumstances of the case otherwise support a finding of bad faith registration and use.

Paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances evidencing bad faith, and the Panel is entitled to consider all relevant factors in the case ([WIPO Overview 3.0](#), section 3.2.1). In light of the Complainant's well-known trademark, the targeted composition of the disputed domain name, the passive holding combined with the activation of MX records, and the absence of any credible good-faith explanation from the Respondent, the Panel concludes that the disputed domain name was registered and is being used in bad faith within the meaning of paragraph 4(a)(iii) of the Policy.

Accordingly, 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 <ca-illeetvilaine.co> be transferred to the Complainant.

/Elise Dufour/
Elise Dufour
Sole Panelist
Date: December 31, 2025