

ADMINISTRATIVE PANEL DECISION

Archer-Daniels-Midland Company v. Godsgift Prosper
Case No. D2025-3141

1. The Parties

The Complainant is Archer-Daniels-Midland Company, United States of America ("US"), represented by Innis Law Group LLC, US.

The Respondent is Godsgift Prosper, Nigeria.

2. The Domain Name and Registrar

The disputed domain name <adminventory.com> is registered with OwnRegistrar, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 6, 2025. On August 7, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 8, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to the Complainant on August 8, 2025, providing the registrant and contact information disclosed by the Registrar. The Complainant filed an amendment to the Complaint on August 8, 2025.

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 Respondent of the Complaint, and the proceedings commenced on August 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 1, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 3, 2025.

The Center appointed Emre Kerim Yardimci as the sole panelist in this matter on September 9, 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

Founded in 1902, Complainant has become one of the world's premier agribusinesses which provides a range of agribusiness, financial and investment related goods and services under a trademark comprised of its initials ADM (the "ADM Mark"), now serving 200 countries, owning more than 800 facilities worldwide, and employing over 38,000 people.

In 2023, worldwide net sales at ADM were USD 93 billion. Complainant owns numerous trademark registrations in the US and around the world, including the following:

1. US Registration No. 1386430, ADM, registered March 18, 1986, for a range of agricultural related products and services in International Classes 1, 4, 12, 16, 29, 30, 31, 33 and 39;
2. US Registration No. 2766613, ADM, registered September 23, 2003, for a range of financial and investment related products and services in International Classes 16, 35, 36 and 42; and
3. US Registration No. 2307492, ADM, registered January 11, 2000, for a range of financial and business management related products and services in International Classes 35, 36, 40 and 42;

The Complainant asserts that its ADM trademark enjoys substantial goodwill and reputation internationally and refers in this regard to several UDRP decisions.

The Complainant maintains its global presence online, via its various websites, including through its main website at "www.adm.com". The website also allows the Complainant's customers to conduct business with the Complainant from anywhere in the world.

The disputed domain name was created on June 25, 2025, and resolves to an inactive website which has remained inactive, but has been used to send fraudulent communications impersonating a legitimate ADM employee in order to place large fraudulent purchase orders with at least one third-party company.

5. Parties' Contentions

A. Complainant

The Complainant asserts that the disputed domain name is confusingly similar by incorporating the Complainant's well-known trademark ADM and that the addition of the term "inventory" which is a descriptive term, does not prevent the association between the disputed domain name and the Complainant's trademark.

The Complainant considers that the Respondent has no rights or legitimate interests in respect of the disputed domain name, mainly because the Complainant has neither licensed nor authorized the Respondent to use its marks or to apply for or use any domain name incorporating the trademark ADM.

The Complainant further asserts that the Respondent is well aware of the Complainant's trademark as an email account – which contains the disputed domain name – impersonating a Complainant's employee has been used to mislead the Complainant's vendor requesting a formal quote for a large order.

Therefore, the Complainant states that the use of the disputed domain name for illegal and fraudulent activity is a clear indication that the disputed domain name has been registered and used in bad faith.

B. Respondent

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

6. Discussion and Findings

Pursuant to paragraph 4(a) of the Policy, the Complainant is required to prove the presence of each of the following three elements to obtain the remedy it has requested:

- (i) the disputed domain name is 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 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 of WIPO Panel Views on Selected UDRP Questions, Third Edition, (["WIPO Overview 3.0"](#)), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

As indicated above, the Complainant holds several trademark registrations for the trademark ADM. The disputed domain name integrates the Complainant's ADM trademark in its entirety.

The Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms here "inventory" 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 mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

As regards the generic Top-Level Domain ".com", it is typically disregarded under the confusing similarity test under the Policy.

Consequently, the Panel finds that the Complainant has shown that the disputed domain name is confusingly similar to a trademark in which the Complainant has rights.

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 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 3.0](#), 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 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 name such as those enumerated in the Policy or otherwise.

Panels have further held that the use of a domain name for illegal activity as explained hereunder the point C, claimed as impersonation can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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.

At the time of registration of the disputed domain name, the Complainant's trademark ADM was a very well-known trademark for some time throughout the world. As a matter of fact, the Complainant's trademark rights for ADM have been recognized in over 100 UDRP decisions. As the Complainant submits, it is inconceivable that the Respondent would not have known of the Complainant's mark.

In the present case, the Panel notes that the Respondent has registered and used the disputed domain for fraudulent purposes by associating an email address to impersonate an ADM employee. The Respondent is clearly using the disputed domain name to mislead third parties, in this specific case the vendor of the Complainant for his own commercial benefit.

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 3.0](#), section 3.2.1.

Panels have held that the use of a domain name for illegal activity here, claimed as impersonation constitutes bad faith. [WIPO Overview 3.0](#), 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.

It is clear that the Respondent has targeted the Complainant and its ADM trademarks to further its own commercial activities through illegitimate activity such as impersonation. As a matter of fact, such illicit intention activity which may cause a serious financial damage to Internet users and to the Complainant. In this respect, the Panel finds that the evidence which is submitted by the Complainant constitutes plausible and convincing evidence showing the fraudulent activity of the Respondent which may cause serious damage to the Complainant and its clients.

Based on the evidence submitted with the Complaint, it is unequivocally clear that the Respondent was well aware of the Complainant's trademark and its activity. Considering all above facts, there is no doubt that the Respondent had the Complainant's trademark in mind when registering the disputed domain name and is using the disputed domain name in bad faith.

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 <adminventory.com> be transferred to the Complainant.

/Emre Kerim Yardimci/

Emre Kerim Yardimci

Sole Panelist

Date: September 23, 2025