

ADMINISTRATIVE PANEL DECISION

Archer-Daniels-Midland Company v. Alen Leon
Case No. D2025-3790

1. The Parties

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

The Respondent is Alen Leon, Hong Kong, China.

2. The Domain Name and Registrar

The disputed domain name <admwtuowcvbmadh2025.com> is registered with CloudFlare, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 17, 2025. On September 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 19, 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 (unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant September 24, 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 amendment to the Complaint on the same date.

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 September 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 20, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 21, 2025.

The Center appointed Angelica Lodigiani as the sole panelist in this matter on November 11, 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, Archer-Daniels-Midland Company, is commonly known by its initials, ADM. Founded in 1902, the company initially operated in the food and ingredients sector. Currently, it operates in various other fields, including printing and publishing, financial and business management, fuel production, logistics and research and development. The Complainant now serves 200 countries, owns more than 800 facilities worldwide, employs more than 38,000 people, and has become one of the world's leading agribusinesses. In 2023, the Complainant's worldwide net sales amounted to USD 93 billion. The Complainant provides financial services through a related company called ADM Investor Services, Inc. (ADMIS) and many branches around the world. ADMIS has been one of the leaders in future brokerage services for 40 years. Consumers can access ADMIS trading services online, through the domain name <admis.com>, to gain access to its various trading platforms, stock quotes, stock charts and other stock related news.

The Complainant is the owner of various registrations for the ADM mark, registered worldwide, including the following:

- ADM (word), US registration No. 1386430, registered on March 18, 1986, for goods and services in classes 1, 4, 12, 16, 29, 30, 31 and 39, claiming first use in commerce since 1923;
- ADM (word), US registration No. 2766613, registered on September 23, 2003, for goods and services in classes 16, 35, 36 and 42, claiming first use in commerce since November 2001; and
- ADM (word), US registration No. 2307492, registered on January 11, 2000, for services in classes 35, 36, 40 and 42, claiming first use in commerce since July 25, 1996.

The Complainant is also the owner of the domain name <adm.com>, which resolves to the Complainant's main website. On the Complainant's website, the ADM mark is used in blue and in association with a green stylized leaf logo.

The disputed domain name was registered on September 9, 2025, by an individual allegedly located in China. The disputed domain name resolves to a webpage displaying the Complainant's trademark and with an identical leaf logo and inviting visitors to create an account by providing their phone number and a password. The website associated with the disputed domain name is promoted in a YouTube video and described as the "ADM App" and the "Best Earning App". The Complainant's ADM mark and logo appear in the video. Below the video is a link to the website at the disputed domain name.

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 name.

Notably, the Complainant contends that the disputed domain name is confusingly similar to its ADM mark and used in close relation to the ADM's name and mark. The disputed domain name fully incorporates the ADM mark with the ADM portion being the most prominent and recognizable portion of the disputed domain name. Although the rest of the disputed domain name consists of an assortment of seemingly random

letters and the year “2025”, this cannot prevent a finding of confusing similarity as the ADM mark remains identifiable within the disputed domain name.

The Complainant also asserts that the Respondent lacks rights or legitimate interests in the disputed domain name. The Complainant did not authorize the Respondent to use the ADM mark and to incorporate it in the disputed domain name. The Respondent is not commonly known by the disputed domain name. The Respondent is not making a legitimate noncommercial or fair use of the disputed domain name without intent for commercial gain. Rather, the disputed domain name is being used to deceive individuals or to tarnish the ADM mark. In fact, the disputed domain name resolves to a webpage that prominently displays the Complainant's mark and requests visitors' personal information to access a fraudulent investment application. The disputed domain name also appears in a YouTube video promoting the same investment application and displaying the ADM mark. Accordingly, the Respondent is using the disputed domain name to deceive individuals as part of a fraudulent scheme. Therefore, the Respondent's use of the disputed domain name cannot confer him rights or legitimate interests.

Lastly, the Complainant maintains that the Respondent registered and is using the disputed domain name in bad faith. The ADM mark is widely recognized. In light of this and the Respondent's use of the disputed domain name at the time of the filing of the Complaint, the Respondent was clearly aware of the Complainant's rights in the ADM mark prior to registering the disputed domain name.

The Respondent registered the disputed domain name with the clear intention of taking advantage of the ADM mark and of the Complainant for illegitimate purposes. The Respondent created a fraudulent website for the sole purpose of monetary gain by fraudulently purporting to be an investment application associated with the Complainant. The website associated with the disputed domain name features the ADM registered trademark and invites visitors to “Join ADM”. Visitors to the webpage can create an account by entering their personal information. Shortly after registering the disputed domain name and creating the associated webpage, a link to it was posted in the comments section of a YouTube video promoting the “ADM App”. The title of the video reads: “Best Earning App!! ADM App Real or Fake!! [...] ADM App”. Throughout the video, images of the webpage associated with the disputed domain name are shown. It appears to be an investing website displaying minimum deposits and withdrawals. The investing website also features the ADM trademark and displays the different available investment plans. The image showing minimum deposit and withdrawal information also features the Complainant's registered mark and logo and indicates a minimum deposit of INR 500. It also mentions that individuals can receive referrals bonuses.

Given the above, it is clear that the Respondent registered and is using the disputed domain name to take advantage of the reputation of the ADM mark with the intent to use the disputed domain name for an illegitimate purpose, such as misleading Internet users and other third parties for the Respondent's commercial gain by conducting phishing schemes or other illegitimate activities.

B. Respondent

The Respondent did not reply to the 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 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. In particular, the Complainant is the owner of the ADM mark, registered decades before the registration of the disputed domain name.

The entirety of the mark is reproduced and recognizable within the disputed domain name. Although the addition of other terms here, the sequence of letters “wtuowcvbmadh” and the year 2025, 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 name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8. Although the content of the disputed domain name is usually disregarded by panels when assessing confusing similarity under the first element of the Policy, in some instances panels have however taken note of the content of the website associated with a domain name to confirm confusing similarity whereby it appears prima facie that the Respondent seeks to target the Complainant's mark through the disputed domain name. [WIPO Overview 3.0](#), section 1.15. The Panel finds that this is so in this case as it will be further discussed below.

Accordingly, 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 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.

In particular, the Panel notes that the Respondent has no relationship with the Complainant and does not appear to be commonly known by the disputed domain name. The Complainant never authorized the Respondent to make use of its ADM mark, including as part of the disputed domain name.

The Respondent is using the disputed domain name to access a webpage displaying the Complainant's ADM mark and logo. The webpage invites visitors to register by entering their phone number and password. A YouTube video promotes the download of an investment application named “ADM App”, which is defined as “Best Earning App!!” and displays a link to the website at the disputed domain name. The video explains the investment conditions and features the Complainant's trademark and leaf logo many times. The Respondent did not respond to the Complainant's allegations that the investment application accessible through the disputed domain name is fraudulent. Moreover, the Panel notes that the Respondent's webpage linked to the disputed domain name does not contain any information about the alleged investment application, such as the name and contact details of the manager of the application, nor any information about the required licenses and authorizations. Given these circumstances, the Panel concludes that the promoted investment application accessible through the disputed domain name is likely a scam and, in any case, the Respondent is taking advantage of the Complainant's mark to misleadingly divert consumers for

commercial gain. In fact, the Complainant also offers financial services online through its related company ADM Investor Services, Inc. and the domain name <admis.com>, which uses the ADM mark and leaf logo.

Panels have held that the use of a domain name for illegal activity, here, claimed, passing off and fraud, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

In light of the above, 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 this case, the Panel notes that the Respondent was clearly aware of the Complainant's mark when it registered the disputed domain name. This is evidenced not only by the fact that the disputed domain name fully includes the Complainant's mark but also by how the Respondent was using the disputed domain name which led to a webpage featuring the Complainant's mark and logo. Furthermore, the disputed domain name and related website are promoted in a YouTube video that repeatedly refers to the ADM mark and leaf logo. Therefore, the incorporation of the ADM mark in the disputed domain name is not a coincidence but rather the result of a deliberate intention to target the Complainant's trademark to mislead consumers to obtain an undue financial gain. The registration of a domain name incorporating a third party's trademark, being aware of it and without rights or legitimate interests, amounts to registration in bad faith.

As far as use in bad faith is concerned, the Panel notes that the Complainant's ADM mark and logo are featured in the disputed domain name, on the associated website, and referred to in the YouTube video, which contains a link to the website at the disputed domain name and promotes the associated investment application. Therefore, the Panel finds that by using the disputed domain name the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website or location.

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 <admwtuowcvbmah2025.com> be transferred to the Complainant.

/Angelica Lodigiani/

Angelica Lodigiani

Sole Panelist

Date: November 25, 2025