ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Schwegman Lundberg & Woessner, P.A. v. Richards Billings
Case No. D2025-4466

1. The Parties

The Complainant is Schwegman Lundberg & Woessner, P.A., United States of America ("United States"), internally represented.

The Respondent is Richards Billings, United States.

2. The Domain Name and Registrar

The disputed domain name <slwip.org> is registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 29, 2025. On October 30, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 30, 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 Registrant, Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 31, 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 October 31, 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 November 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 26, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Parties of the Respondent's default on November 27, 2025.

The Center appointed Ingrīda Kariņa-Bērziņa as the sole panelist in this matter on December 2, 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 a law firm headquartered in Minneapolis, Minnesota, United States, specialized in the practice of intellectual property law. It is the proprietor of the following trademark registrations:

- United States Trademark Registration No. 5204565 SLW INSTITUTE Building Extraordinary IP Assets for

(SLW INSTITUTE BUILDING EXTRAORDINARY IP ASSETS) (device mark), registered on May 16, 2017, for services in International Class 41;

- United States Trademark Registration No. 5209416 SLW SCHWEGMAN LUNDBERG • WOESSNER PATENT PROTECTION FOR HIGH TECHNOLOGY for

(SLW SCHWEGMAN LUNDBERG WOESSNER PATENT PROTECTION FOR HIGH TECHNOLOGY), registered on May 23, 2017, for services in International Class 45, claiming a date of first use in November 2014.

In addition, the Complainant claims unregistered rights in the device SLW mark and word mark SLW dating from 2008. In support of this contention, the Complainant provides evidence of the firm's recognition in industry rankings and links to press coverage about the firm. The marks are also used on the firm's website and social-media accounts such as LinkedIn, Facebook, and YouTube.

The Complainant operates its primary business website at the domain name <slwip.com>.

The disputed domain name was registered on August 22, 2025. At the time of the Complaint, it resolved to a page featuring pay-per-click ("PPC") advertisements. At the time of this Decision, it did not resolve to an active website. The record contains evidence that the disputed domain name was used to generate emails soliciting payment from a client of the Complainant.

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 it is a boutique law firm, founded in 1993, with offices in Minneapolis, Minnesota, and San Jose, California, United States, with over 100 attorneys and patent agents. The Complainant has used the unregistered SLW mark since at least 2008 in connection with legal and educational services. The disputes domain name is identical to this mark, with the addition of the letters "ip" alluding to the Complainant' s field of specialization, namely, intellectual property ("IP") law. The Respondent is not affiliated with the Complainant and has no rights in the disputed domain name, which has been used to perpetuate a fraudulent scheme. It was used to generate multiple emails to the Complainant's client impersonating the Complainant's employee, seeking payment for services rendered by the Complainant. The disputed domain name is confusingly similar to the Complainant' s domain name, which facilitated this scheme.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the UDRP requires the Complainant to make out all three of the following:

(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 Respondent has registered and is using the disputed domain name in bad faith.

Under paragraph 15(a) of the Rules, "[a] Panel shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable".

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 two service marks for the purposes of the Policy. Each of the two service marks includes the letters "SLW". WIPO Overview 3.0, section 1.2.1. In addition, based on the available record, the Panel finds the Complainant has established unregistered service mark rights in the SLW mark for the purposes of the Policy. The fact that the Respondent is shown to have been targeting the Complainant's mark (e.g., based on the manner in which the disputed domain name has been used) supports the Complainant's assertion that its SLW mark has achieved significance as a source identifier. WIPO Overview 3.0, section 1.3.

The Panel finds that a dominant feature of the Complainant's two service marks is recognizable in the disputed domain name. Accordingly, the disputed domain name is confusingly similar to these marks for the purposes of the Policy. WIPO Overview 3.0, section 1.7. Moreover, the entirety of the SLW mark is reproduced 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, "ip") may bear on assessment of the second and third elements, the Panel finds the addition of such a term does not prevent a finding of confusing similarity between the disputed domain name and the marks for the purposes of the Policy. WIPO Overview 3.0, 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 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.

The Panel notes there is no evidence that the Respondent has used the disputed domain name in connection with a bona fide offering of goods or services, nor that the Respondent has been commonly known by the disputed domain name. There is no evidence that the Respondent has made a legitimate noncommercial or fair use of the disputed domain name.

Rather, the record contains evidence that the Respondent attempted to impersonate an employee of the Complainant by sending emails concerning payment of invoices due to the Complainant. Panels have held that the use of a domain name for illegal activity (here, claimed impersonation/passing off, or other types of fraud) 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.

In the present case, the Panel notes that the Respondent intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's marks. The Complainant established rights in its SLW and related device marks several years prior to the registration of the disputed domain name, and the disputed domain name reflects the SLW mark in its entirety, together with the letters "ip," which indicates a direct link to the Complainant's IP law practice. The Complainant moreover uses the domain name <slwip.com> for email addresses of its employees. On this record, the Panel finds that the disputed domain name was registered in bad faith. WIPO Overview 3.0, section 3.1.4.

Panels have held that the use of a domain name for illegal activity (here, claimed impersonation/passing off, or other types of fraud) constitutes bad faith. WIPO Overview 3.0, section 3.4. Having reviewed the record, the Panel finds that the Complainant has provided evidence that the Respondent has used the disputed domain name to generate fraudulent emails to a client of the Complainant in an attempt to obtain payment intended for the Complainant. The Respondent has not attempted to provide a good-faith explanation for such conduct and the Panel does not find it credible that one could exist. On this 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 name <slwip.org> be transferred to the Complainant.

/Ingrīda Kariņa-Bērziņa/
Ingrīda Kariņa-Bērziņa
Sole Panelist
Date: December 11, 2025