

## ADMINISTRATIVE PANEL DECISION

Lincoln Global, Inc., The Lincoln Electric Company v. Catherine D Coleman  
Case No. D2025-4754

### 1. The Parties

Complainants are Lincoln Global, Inc., United States of America (“United States”) and The Lincoln Electric Company, United States, represented by CSC Digital Brand Services Group AB, Sweden.

Respondent is Catherine D Coleman, United States.

### 2. The Domain Name and Registrar

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

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 17, 2025. On November 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 17, 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 (Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to Complainants on November 18, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainants to submit an amendment to the Complaint. Complainants filed an amended Complaint on November 18, 2025.

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 November 21, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 11, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on December 15, 2025.

The Center appointed Bradley A. Slutsky 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

Lincoln Global, Inc. and The Lincoln Electric Company are sister companies owned by Lincoln Electric Holdings Inc. Each of them owns one or more of the trademarks listed below. Together, they are referred to in this decision as “Complainant”, unless they are specifically referenced separately by their full corporate name. The Complaint states that “Lincoln Electric” was founded in 1895 by John C. Lincoln, who was later joined by his brother James F. Lincoln. The company began with the sale of electric motors and expanded its product line to include battery chargers and, according to the Complaint, the world’s first variable voltage, single-operator, portable welding machine in 1911. Lincoln Electric has grown into a global leader in the design, development, and manufacture of welding, brazing, and soldering products. Its solutions are used in over 160 countries, and the company operates 71 manufacturing and automation system integration locations across 21 countries, employing over 12,000 people worldwide. In 2023, Lincoln Electric reported sales of USD 4.2 billion. The company is headquartered in Cleveland, Ohio and is publicly traded on the NASDAQ stock exchange under the symbol LECO.

In 2024, Lincoln Electric was named one of “America’s Best Mid-Size Companies” by Time Magazine, one of “America’s Great Workplaces” by Newsweek, and one of the “World’s Most Ethical Companies” by the Ethisphere Institute.

The Complaint is based on several registered trademarks for LINCOLN ELECTRIC, which are owned by one or the other Complainant in various jurisdictions, including the European Union, the United States, and Canada. The relevant trademark registrations include:

<b>Mark /Services (International Class) . No.</b>	<b>Reg. Date</b>			
LINCOLN ELECTRIC	6, 9, and 35	European Union	004725941	November 27, 2006
LINCOLN ELECTRIC	1, 7, and 8	European Union	015346935	August 31, 2016
LINCOLN ELECTRIC	6, 7, 9, and 35	European Union	004982468	January 15, 2008
LINCOLN ELECTRIC	9	United States	2350082	May 16, 2000
LINCOLN ELECTRIC	35	United States	2420805	January 16, 2001
LINCOLN ELECTRIC	6	United States	3114157	July 11, 2006
LINCOLN ELECTRIC	1	Canada	TMA573494	January 13, 2003
LINCOLN ELECTRIC	7 and 9	Canada	TMA574202	January 22, 2003

These marks are used in connection with a wide range of goods and services, including welding products, equipment, and related services.

Lincoln Electric maintains a substantial Internet presence, having registered over 450 domain names incorporating the LINCOLN ELECTRIC trademark and variations, including its primary domain name <lincolnelectric.com>, registered on February 24, 1996. According to Complainant, the website at this domain name receives significant traffic, with an average of 401,900 hits in December 2024, and is highly

ranked in its industry and globally. Complainant also maintains a social media presence, with 1 million Facebook followers, over 40,000 followers on X, and over 78,000 YouTube subscribers.

The disputed domain name is <lincolnaelectric.com>. It was registered by the Respondent on October 12, 2025, well after the Complainant's trademarks and primary domain name were registered.

According to a screenshot annexed to the Complaint, as of June 11, 2025, the disputed domain name resolved to a website featuring links to third-party websites, presumably generating Pay-Per-Click ("PPC") revenue for Respondent. The disputed domain name also was set up with email-enabling Mail Exchanger ("MX") records, creating the potential for use of the disputed domain name in email communications that could confuse users into believing they are dealing with Complainant.

Respondent is Catherine D. Coleman of Lexington, South Carolina, United States. There is no evidence of any relationship between the Parties prior to this dispute.

## 5. Parties' Contentions

### A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Notably, Complainant owns several trademark registrations for the LINCOLN ELECTRIC mark in various jurisdictions, all of which predate the registration of the disputed domain name. Complainant argues that the disputed domain name <lincolnaelectric.com> is confusingly similar to its LINCOLN ELECTRIC trademark, adding only the letter "a" between "Lincoln" and "Electric" and the ".com" generic Top-Level Domain ("gTLD"). Complainant contends that this constitutes "typosquatting," and "that a deliberate misspelling of a trademark registered as a domain name, which is intended to confuse Internet users, must be confusingly similar by design."

Complainant further maintains that Respondent has no rights or legitimate interests in the disputed domain name and "is not sponsored by or affiliated with Complainant in any way. Furthermore, ...Complainant has not given Respondent permission to use Complainant's trademarks in any manner, including in domain names." Complainant adds that Respondent used the disputed domain name to redirect Internet users to a website featuring links to third-party websites, likely generating PPC revenue, and that such use does not constitute a bona fide offering of goods or services nor a legitimate noncommercial or fair use. In addition, Complainant points to the fact that the disputed domain name has been configured with email-enabling MX records, which Complainant asserts could be used to deceive Internet users into believing they are communicating with Complainant, potentially for fraudulent purposes which "is neither a bona fide offering of goods or services, nor a legitimate non-commercial or fair use". Complainant emphasizes that Respondent registered the disputed domain name long after Complainant's use and registration of its trademarks, further undermining any claim to rights or legitimate interests.

Finally, Complainant contends that the disputed domain name was registered and is being used in bad faith – alleging that Complainant's LINCOLN ELECTRIC trademark is internationally recognized, and Complainant's business and trademarks predate the registration of the disputed domain name by over 100 years. Complainant argues that Respondent's registration of a domain name that is a one-letter-typo of Complainant's mark demonstrates knowledge of and familiarity with Complainant's brand, and that typosquatting is itself evidence of bad faith registration and use. Complainant further observes that the use of a confusingly similar domain name to attract Internet users "to a website featuring links to third-party websites that create revenue for the [R]espondent", and the activation of MX records for potentially fraudulent email use, also constitute bad faith. In addition, Complainant alleges that Respondent has previously been found to have been cybersquatting in *Insured Aircraft Title Company, LLC v. Name Redacted, WIPO Case No. D2025-0890*.

## **B. Respondent**

Respondent did not reply to Complainant's contentions.

## **6. Discussion and Findings**

The Panel notes that it is not always the case that two distinct corporate entities may bring a consolidated UDRP dispute together. This issue is addressed in the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.0"), section 4.11.1. In light of the fact that, in this matter, the Complainants are sister companies and each owns LINCOLN ELECTRIC trademarks, the Panel finds that it would be equitable and procedurally efficient to permit consolidation in this matter. See *Lincoln Global, Inc., and The Lincoln Electric Company v. Assiat Enroy*, stroud wears, WIPO Case No. [D2025-2917](#).

Pursuant to paragraph 15(a) of the Rules, a panel in UDRP proceedings "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".

Under paragraph 4(a) of the Policy, Complainant must prove the following:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which Complainant has rights;
- (ii) 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 Complainant's trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

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.

The entirety of the mark is reproduced within the disputed domain name, with an "a" inserted between "lincoln" and "electric" and the addition of the ".com" gTLD. Although the addition of other terms 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 ("Where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element."). Indeed, "[a] domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. ... Examples of such typos include ... the addition or interspersion of other terms or numbers." [WIPO Overview 3.0](#), section 1.9. The addition of the ".com" gTLD also does not avoid confusing similarity. The gTLD in a domain name "is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test." [WIPO Overview 3.0](#), section 1.11.1. The disputed domain name thus is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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 Respondent may demonstrate rights or legitimate interests in a disputed domain name.

“Any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate [Respondent’s] rights or legitimate interests to the domain name[s] for purposes of paragraph 4(a)(ii):

- (i) before any notice to [Respondent] of the dispute, [Respondent’s] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
- (ii) [Respondent] (as an individual, business, or other organization) [has] been commonly known by the [disputed] domain name, even if [Respondent has] acquired no trademark or service mark rights; or
- (iii) [Respondent is] making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue”. Policy, paragraph 4(c).

Although the overall burden of proof in UDRP proceedings is on 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 Respondent. As such, where a complainant makes out a *prima facie* case that a 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 Complainant has established a *prima facie* case that Respondent lacks rights or legitimate interests in the disputed 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 disputed domain name such as those enumerated in the Policy or otherwise.

There is no evidence that Respondent has used or prepared to use the disputed domain name in connection with a bona fide offering of goods or services, or has been commonly known by the disputed domain name, or is making a legitimate noncommercial or fair use of the disputed domain name. Respondent is not affiliated with or licensed by Complainant. Neither the registrant record for the disputed domain name nor any other evidence in this matter indicates that Respondent has been commonly known by the disputed domain name. The only evidence of Respondent’s use of the disputed domain name is that it resolves to a website featuring PPC links to third-party websites, and the disputed domain name is configured with an email-enabling MX record. On the facts of this case, neither such use confers rights or legitimate interests under the Policy. As set out in [WIPO Overview 3.0](#), section 2.9, “panels have found that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant’s mark or otherwise mislead Internet users.” See also *Magna International Inc. v. Lauren Wong, Magna*, WIPO Case No. [D2025-2765](#).

Accordingly, 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. Specifically, “the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith:

- (i) circumstances indicating that [Respondent has] registered or [Respondent has] acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of [Respondent’s] documented out-of-pocket costs directly related to the domain name; or
- (ii) [Respondent has] registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that [Respondent has] engaged in a pattern of such conduct; or
- (iii) [Respondent has] registered the domain name primarily for the purpose of disrupting the business of a competitor; or
- (iv) by using the domain name, [Respondent has] intentionally attempted to attract, for commercial gain, Internet users to [Respondent’s] 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 [Respondent’s] website or location or of a product or service on [Respondent’s] website or location.” Policy, paragraph 4(b).

“Given that the scenarios described in UDRP paragraph 4(b) are non-exclusive and merely illustrative, even where a complainant may not be able to demonstrate the literal or verbatim application of one of the above scenarios, evidence demonstrating that a respondent seeks to take unfair advantage of, abuse, or otherwise engage in behavior detrimental to the complainant’s trademark would also satisfy complainant’s burden.” [WIPO Overview 3.0](#), section 3.1.

In the present case, it appears that Respondent registered the disputed domain name with knowledge of Complainant’s LINCOLN ELECTRIC mark, which predates the registration of the disputed domain name by over 20 years. The disputed domain name does, after all, use the terms “Lincoln” and “Electric”, and nothing in the record indicates why those terms would have been used other than to refer to Complainant. The disputed domain name also appears to be an example of typosquatting – differing from Complainant’s mark only by the insertion of a single letter. As noted in [WIPO Overview 3.0](#), section 3.1.4, “Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith.”

Respondent’s use of the disputed domain name to host PPC links and the configuration of MX records for potential email use further support a finding of bad faith. Such conduct is intended to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant’s mark as to the source, sponsorship, affiliation, or endorsement of the website or email communications. See [WIPO Overview 3.0](#), section 3.5; *Corning Incorporated v. lost boy*, WIPO Case No. [D2025-0409](#) (“the Disputed Domain Name initially resolved to a parking page displaying PPC links to third-party services and the Panel infers that the Respondent derives a financial benefit in the form of click-through revenue from the presence of such links on the website to which the Disputed Domain Name resolves. Regardless of whether the Respondent is generating click-through revenue, it is well established that the use of a domain name to redirect Internet users to websites of competing services constitutes bad faith registration and use in and of itself. ...The Panel finds that by using the Disputed Domain Name in such a manner, the Respondent intentionally attempted to attract, for commercial gain, Internet users to its website, by creating a likelihood of confusion

with the Complainant's CORNING Mark as to the source, sponsorship, affiliation, or endorsement of the Disputed Domain Name, in bad faith pursuant to paragraph 4(b)(iv) of the Policy."); *SEB S.A. v. Juan Carlos*, WIPO Case No. [D2025-0903](#).<sup>1</sup>

Accordingly, 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 disputed domain name, <lincolnaelectric.com>, be transferred to Complainant.

/Bradley A. Slutsky/

**Bradley A. Slutsky**

Sole Panelist

Date: January 7, 2026

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<sup>1</sup>Complainant also asserts that Respondent has engaged in a bad faith pattern of cybersquatting, as allegedly evidenced by the fact that Respondent was a named registrant of the domain name at issue in *Insured Aircraft Title Company, LLC v. Name Redacted*, WIPO Case No. [D2025-0890](#). However, the Panelist in that case found that the names of the respondents in that matter "were used by a third party without their knowledge or consent to register the disputed domain names", and the Panelist refers to these individuals as "unwitting 'proxies' in the registrations of the disputed domain names". While it nonetheless is possible that Respondent in this matter was in fact involved in WIPO Case No. [D2025-0890](#), there is insufficient evidence in the record in this matter to reach that conclusion.