

ADMINISTRATIVE PANEL DECISION

Stichting BDO v. Tarren Adriaanse, Tarren Adriaanse, Noor Brenner, Itay Rogers

Case No. D2025-4900

1. The Parties

The Complainant is Stichting BDO, Netherlands (Kingdom of the), represented by CSC Digital Brand Services Group AB, Sweden.

The Respondents are, Noor Brenner, United Kingdom; Tarren Adriaanse, Tarren Adriaanse, South Africa; and Itay Rogers, South Africa (collectively “the Respondent”).

2. The Domain Names and Registrars

The disputed domain name <bdoglobal-canada.com> is registered with Spaceship, Inc.

The disputed domain name <bdoglobalforensics.co> is registered with GoDaddy.com, LLC.

The disputed domain name <bdo-globalforensics.com> is registered with Tucows Domains Inc. (collectively the “Registrars”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 25, 2025. On November 25, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On November 25 and 26, 2025, the Registrars transmitted by email to the Center their verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Registration Private Domains By Proxy, LLC / Redacted for Privacy Purposes, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint.

The Center sent an email communication to the Complainant on November 28, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on December 2, 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 the Respondent of the Complaint, and the proceedings commenced on December 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 30, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 5, 2026.

The Center appointed Olga Zalomiy as the sole panelist in this matter on January 13, 2026. 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 the owner of all intellectual property rights to the brand “BDO”. BDO is an international network of independent public accounting, tax, consulting, and business advisory firms which are members of BDO International Limited and perform professional services under the name and style of BDO. The Complainant owns numerous trademark registrations for the BDO trademark, such as:

- United States of America trademark registration No. 2699812 for the BDO mark (word and design), registered on March 25, 2003;
- International trademark registration No. 697500 for the BDO mark (word and design), registered on May 15, 1998; and
- United States of America trademark registration No. 4854142 for the BDO mark, registered on November 17, 2015.

The Complainant also owns multiple domain names incorporating its trademark, such as <bdo.global> and <bdoglobal.com>.

The Respondent registered the disputed domain name <bdoglobal-canada.com> on July 10, 2025, <bdoglobalforensics.co> on September 17, 2025, and <bdo-globalforensics.com> on October 2, 2025. The disputed domain name <bdoglobal-canada.com> resolves to “page not found” error page.

The disputed domain names <bdoglobalforensics.co> and <bdo-globalforensics.com> resolve to identical websites that display the Complainant’s trademark and repeat its color scheme. The website connected to the <bdo-globalforensics.com> disputed domain name displays the official address of the Complainant’s office in Canada. The email address “[...]@bdoglobal-canada.com” associated with the disputed domain name <bdoglobal-canada.com> is featured on the contact page found on <bdo-globalforensics.com> as the contact email. All three disputed domain names have active Mail Exchange (“MX”) records.

The website under the disputed domain name <bdoglobalforensics.co> displays the following statement: “BDO Global Forensics is a leading cryptocurrency tracing and recovery firm with a team of seasoned professionals from SOCA and Interpol.” On November 5, 2025, an email was sent to a third party from the email address “[...]@bdoglobalforensics.co”. The sender claimed to have “an important updates [...] concerning recovery of funds taken by the fraudulent company you were dealing with” and suggested to review “the next steps”.

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 names.

Notably, the Complainant contends that the disputed domain names are confusingly similar to its BDO trademark because they incorporate the Complainant's trademark in its entirety, combined with descriptive terms "global forensics" and "global canada". According to the Complainant, such additions or alterations are insufficient to prevent a finding of confusing similarity between the disputed domain names and the Complainant's trademark. The Complainant alleges that the inclusion of the Top-Level Domains ("TLD") ".com" and ".co" should be disregarded from the comparison of the disputed domain names and the Complainant's trademark as the registration elements.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain names because it is not affiliated with the Complainant and has not been given a permission to use the Complainant's trademark in any manner. The Complainant contends that the Respondent is not commonly known by the disputed domain names because the Respondent's name does not correspond to the disputed domain names and because the Respondent used a privacy Whois services to conceal its identity. The Complainant claims that the disputed domain names <bdo-globalforensics.com> and <bdoglobalforensics.co> direct to identical websites that display a slight alteration of the Complainant's logo and the Complainant's website's color scheme. The Complainant alleges that the disputed domain name <bdoglobal-canada.com> is listed on the website's contact page at the disputed domain name <bdo-glbfalforensics.com>. Finally, the Complainant contends that the Respondent attempted to impersonate the Complainant by sending emails from an email address associated with the disputed domain name <bdoglobalforensics.co> to third parties.

The Complainant alleges that the Respondent registered the disputed domain name in bad faith, because its registration of the disputed domain names incorporating the Complainant's trademark and generic terms "global forensics" and "global canada" indicate the Respondent's knowledge of and familiarity with the Complainant's brand and business. The Complainant argues that the Respondent's use of the disputed domain names to direct to websites that mimic the Complainant's website supports this contention. The Complainant contends that the Respondent is using the disputed domain names in bad faith because it is using the disputed domain names to create likelihood of confusion as to the source, sponsorship, affiliation or endorsement of the disputed domain names for commercial gain. The Complainant further alleges that the Respondent's use of the disputed domain name <bdoglobalforensics.co> for a phishing email, indicates its use of the disputed domain name in bad faith. The Complainant argues that the Respondent's current non-use of the <bdoglobal-canada.com> disputed domain name does not prevent finding of bad faith use. In the Complainant's view, the Respondent's activation of MX records for the disputed domain names – thereby enabling them to send and receive emails – indicates an intent to use the disputed domain names for fraudulent, email-based activities. The Complainant contends that the Respondents' use of a privacy shield at the time of the disputed domain names registration is another indication of the bad faith registration of the disputed domain names. The Complainant states that the Respondent's failure to respond to the Complainant's cease and desist letters is another factor indicating the Respondent's registration and use of the disputed domain names in bad faith.

B. Respondent

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

6. Discussion and Findings

Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

As regards common control, the Panel notes that each disputed domain name incorporates the Complainant's trademark together with the term "global". The disputed domain names <bdo-globalforensics.com> and <bdoglobalforensics.co> both include the term "forensics" and resolve to similarly designed websites displaying the Complainant's trademark and replicating its color scheme. All three disputed domain names list Gmail email addresses and a contact telephone number with the country code +27 (South Africa). An email address associated with the disputed domain name <bdoglobal-canada.com> is featured on the contact page found on <bdo-globalforensics.com> as the contact email "[...][\[...\]](mailto:[...]@bdoglobal-canada.com)@bdoglobal-canada.com". In addition, all three disputed domain names have MX records configured. Based on the totality of the circumstances, the Panel finds that the Complainant has established, on balance, that the disputed domain names are subject to common control.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as “the Respondent”) in a single proceeding.

6.2. Substantive Issues

Pursuant to paragraph 4(a) of the Policy, to succeed in these proceedings, the Complainant must prove each of the following elements with respect to each of the disputed domain names:

- (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.

The Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are 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, “global”, “forensics” and “canada”, 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 names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8. The inclusion of the TLDs “.com” and “.co” is typically disregarded in the context of the confusing similarity assessment, being a technical requirement of registration. [WIPO Overview 3.0](#), section 1.11.1.

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 names. 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 names such as those enumerated in the Policy or otherwise.

The Panel accepts that there is no evidence that the Respondent is commonly known by the disputed domain names or of the Respondent’s use of, or demonstrable preparations to use, the disputed domain names or a name corresponding to the disputed domain names in connection with a bona fide offering of goods or services.

Neither is the Respondent making a legitimate noncommercial or fair use of the disputed domain names because the disputed domain name <bdoglobal-canada.com> does not resolve to any active website and the disputed domain names <bdoglobalforensics.co> and <bdo-globalforensics.com> resolve to identical websites that are designed to look like a Complainant’s official website. Both of them replicate the Complainant’s website color scheme and display its trademark.

Panels have held that the use of a domain name for illegitimate activity, here, impersonation/passing off and phishing, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1. Therefore, use of the disputed domain name <bdoglobalforensics.co> does not confer any rights or legitimate interests on the Respondent.

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 registered the disputed domain names incorporating the Complainant's trademark and the descriptive terms "global", "forensics" and "canada" many years after the Complainant's first trademark registration. The Respondent's lack of rights or legitimate interests in the disputed domain names, the absence of a credible explanation for choosing the disputed domain names, the composition of the disputed domain names, and the Respondent's use of two of the disputed domain names to direct to websites using the Complainant's slightly revised logo, recreating the "look and feel" of the Complainant's official website and using address of the Complainant's office in Canada, indicate that the disputed domain names were registered in bad faith.

The UDRP establishes that, for purposes of paragraph 4(a)(iii), bad faith registration and use of a domain name can be established by a showing of circumstances indicating that the respondent is using the domain name to intentionally attempt to attract, for commercial gain, Internet users to the respondent's website or other online location, by creating a likelihood of confusion with the complainant's mark as to source, sponsorship, affiliation or endorsement of the respondent's website or location, or of a product or service on the respondent's website or location. See Policy, paragraph 4(b)(iv).

Prior UDRP panels have found "the following types of evidence to support a finding that a respondent has registered a domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the complainant's mark: (i) actual confusion; (ii) seeking to cause confusion (including by technical means beyond the domain name itself) for the respondent's commercial benefit, even if unsuccessful; (iii) the lack of a respondent's own rights to or legitimate interests in a domain name; [...]" WIPO Overview, section 3.1.4.

Here, the Respondent, who has no rights to or legitimate interests in the disputed domain names, registered the disputed domain names that incorporate the Complainant's trademark in its entirety and used them to direct to websites using the Complainant's trademark. The website prominently displayed the Complainant's trademark and included the address of the actual Complainant's office in Canada. Therefore, the Panel concludes that the Respondent registered and is using the disputed domain name to intentionally attempt to attract, for commercial gain, Internet users to the 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 the Respondent's website or location, or of a product or service on the Respondent's website or location.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness or reputation of the Complainant's trademark, and the composition of the disputed domain names, and finds that in the circumstances of this case the passive holding of the disputed domain name <bdoglobal-canada.com> does not prevent a finding of bad faith under the Policy.

Panels have held that the use of a domain name for illegitimate activity, here, claimed impersonation/passing off and phishing, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's use of the disputed domain name <bdoglobalforensics.co> for a phishing email constitutes bad faith under the Policy.

The Panel also finds that the presence of MX records indicates that mail servers have been configured, which may suggest that the Respondent intends to, or has already, engaged in phishing or other fraudulent activities. The fact that the Respondent have already used one of the disputed domain names for such impersonation, supports this inference.

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 names <bdoglobal-canada.com>, <bdoglobalforensics.co>, <bdo-globalforensics.com> be transferred to the Complainant.

/Olga Zalomiy/

Olga Zalomiy

Sole Panelist

Date: January 27, 2026