

## **ADMINISTRATIVE PANEL DECISION**

The Raymond Corporation v. Ruth Alison  
Case No. D2025-5208

### **1. The Parties**

The Complainant is The Raymond Corporation, United States of America (“United States”), represented by Quarles & Brady LLP, United States.

The Respondent is Ruth Alison, United States.

### **2. The Domain Name and Registrar**

The disputed domain name <jobs-raymondcorp.com> (the “Domain Name”) is registered with Spaceship, Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 12, 2025. On December 15, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On December 15, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name that differed from the named Respondent (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 16, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to amend the Complaint. The Complainant filed an Amended Complaint on December 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”), the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy.

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint and the Amended Complaint, and the proceedings commenced on December 22, 2025. In accordance with the Rules, paragraph 5, the due date for a Response was January 11, 2026. The Respondent did not submit a response. Accordingly, the Center notified the Respondent’s default on January 12, 2026.

The Center appointed A. Justin Ourso III as the panelist in this matter on January 19, 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, a New York corporation, is a leading global provider of material handling vehicles, such as forklifts, and intralogistics products and systems, which has operated under its RAYMOND mark since 1950.

The Complainant owns United States registration, No. 859,985, for its RAYMOND trademark, issued on November 12, 1968, for electric motors, component parts, and related electrical products, in classes 7 and 9, with a first use date in November 1950; United States registration, No. 2,305,968, for its RAYMOND trademark, issued on January 4, 2000, for material handling vehicles and component parts, in class 12, with a first use date of September 5, 1951; and other registrations.

The Complainant owns the domain name <raymondcorp.com>, which it registered on November 22, 1995, and operates a web site at “www.raymondcorp.com,” through which it advertises its goods and services.

The Respondent registered the Domain Name on October 22, 2025, and, within two days, used the Domain Name to send an email impersonating a fictitious Complainant employee and targeting a potential Complainant job applicant with a phishing scheme. Prior to and since the filing of the Complaint, the Domain Name has not resolved to an active web site.

#### **5. Parties' Contentions**

##### **A. Complainant**

The Complainant contends that it has satisfied each of the elements required under the Policy to transfer the Domain Name, which it requested. Notably, the Complainant contends that, within two days of registering the Domain Name, the Respondent sent to a potential job applicant an email, fraudulently impersonating a fictitious employee of the Complainant, in which the Respondent requested the applicant's job resume in a fraudulent false hiring scheme; conducted a fraudulent videoconference interview of the applicant for a nonexistent job with the Complainant; offered the applicant a nonexistent job; solicited the applicant's mailing address and sent the applicant a check using the Complainant's name and place of business with fraudulent banking and routing information, purportedly to purchase home-office equipment; instructed the applicant to deposit the check remotely and communicate with a “setup specialist” for additional steps or for issues that arose; and three days after the first email to a potential job applicant, the Respondent sent a nearly identical email to a second job applicant, again fraudulently impersonating the fictitious hiring manager to solicit the applicant's resume.

##### **B. Respondent**

The Respondent did not submit a response to the Amended Complaint.

#### **6. Discussion and Findings**

A complainant must prove three elements to obtain relief: (i) the domain name is identical or confusingly similar to a trademark in which the complainant has rights; (ii) the respondent has no rights or legitimate interests in the domain name; and (iii) the respondent registered and is using the domain name in bad faith. Policy, paragraph 4(a).

### **A. Identical or Confusingly Similar**

On the first element, the Panel finds that the Complainant's registrations establish its trademark rights. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.0"), section 1.2.1. The Domain Name incorporates the entire trademark, and the trademark is recognizable within the Domain Name, notwithstanding the addition of a descriptive element "jobs-" before the mark and the entity designation "corp" after the mark. The Panel finds that the Domain Name is confusingly similar to the trademark. [WIPO Overview 3.0](#), sections 1.7 and 1.8. Accordingly, the Panel concludes that the Complainant has proven the first element: the Domain Name is confusingly similar to a trademark in which it has rights.

### **B. Rights or Legitimate Interests**

The Respondent has not claimed the existence of any circumstance under the Policy, paragraph 4(c), that demonstrates that a respondent has rights to, or legitimate interests in, a domain name. The Complainant, on the other hand, has shown that it established its trademark rights before the Respondent registered the Domain Name; it has not authorized the Respondent to use its trademark; the Respondent is not commonly known by the Domain Name; and the Respondent has used the Domain Name to impersonate the Complainant in an apparent phishing scheme, which is not a bona fide commercial use, a legitimate noncommercial use, or a fair use of the Domain Name. This constitutes *prima facie* a showing that the Respondent lacks any rights or legitimate interests in the Domain Name under the Policy, paragraph 4(a)(ii), shifting the burden of production on this second element to the Respondent to come forward with relevant evidence proving rights or legitimate interests in the Domain Name. [WIPO Overview 3.0](#), sections 2.1 and 2.13. The Respondent has not submitted any evidence to rebut the *prima facie* showing.

Additionally, the Respondent's name and email address do not resemble the Domain Name, corroborating that the Respondent is not commonly known by the Domain Name and the Respondent failed to provide any evidence of an actual or a planned bona fide commercial use, a noncommercial use, or a fair use of the Domain Name, or even to respond to the Complaint. On the contrary, the evidence shows impersonation and an intended deceptive use for commercial gain. [WIPO Overview 3.0](#), sections 2.5 and 2.13.

Most importantly, the Panel finds that the Complainant has proven that the Respondent impersonated a fictitious Complainant employee in a phishing attempt to obtain personal and banking information for identity and financial theft. Panels have categorically held that the use of a domain name for impersonation to perpetrate a fraud can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13. Accordingly, the Panel concludes that the Complainant has proven the second element: the Respondent lacks rights or legitimate interests in the Domain Name.

### **C. Registered and Used in Bad Faith**

The Panel finds that the Respondent deliberately chose a domain name whose only plausible purpose is for deceptive emails targeting Complainant job applicants. The Respondent then promptly impersonated a fictitious Complainant employee in a phishing attempt to obtain personal and banking information from a Complainant job applicant for identity and financial theft, which is *per se* a deceptive and illegitimate activity and a bad faith use of the Domain Name. [WIPO Overview 3.0](#), sections 3.1.4, 3.2.1, and 3.4. These findings compel the Panel's conclusion that the Respondent (1) intentionally registered the Domain Name in bad faith to impersonate the Complainant and target a Complainant job applicant and (2) used it in bad faith to impersonate the Complainant and target a Complainant job applicant for its own illegitimate commercial gain. [WIPO Overview 3.0](#), sections 3.1, 3.1.4, and 3.4. The Respondent's use of a privacy service without explanation and the Respondent's failure to submit a response to the Complaint support the conclusion of bad faith registration and use. [WIPO Overview 3.0](#), sections 3.6, and 4.3. Accordingly, the Panel concludes that the Complainant has proven the third element: the Respondent registered and is using the Domain Name in bad faith.

## 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 Domain Name <jobs-raymondcorp.com> be transferred to the Complainant.

*/A. Justin Ourso III/*

**A. Justin Ourso III**

Panelist

Date: January 28, 2026