

ADMINISTRATIVE PANEL DECISION

voestalpine BÖHLER Edelstahl GmbH & Co KG v. Sandra McLaughlin
Case No. D2025-5437

1. The Parties

The Complainant is voestalpine BÖHLER Edelstahl GmbH & Co KG, Austria, represented by Patentanwaltskanzlei Jell, Austria.

The Respondent is Sandra McLaughlin, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <bohler-edeistahl.com> (the “Domain Name”) is registered with Wild West Domains, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 30, 2025. On January 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On January 4, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 5, 2026, 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 amended Complaint on January 7, 2026.

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 January 8, 2026. In accordance with the Rules, paragraph 5, the due date for Response was January 28, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 29, 2026.

The Center appointed Ian Lowe as the sole panelist in this matter on February 2, 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 an Austrian company specializing in the manufacture and distribution of high-performance metals and stainless-steel products. It is a subsidiary of group company voestalpine AG. The Complainant and/or its predecessors have conducted business under the BÖHLER name for very many years. The Complainant and other members of the voestalpine Group are the proprietors of a number of registered trademarks comprising BÖHLER, including International trademark number 551655 BOHLER and device, registered on October 23, 1989; and European Union Trade Mark number 001840867 BÖHLER EDELSTAHL. FÜR DIE BESTEN DER WELT, registered on February 7, 2002 (together the "Marks").

The Complainant has operated its domain name <bohler-edelstahl.com> since 2003, using it for its official website and email communications.

The Domain Name was registered on July 27, 2025. It does not resolve to an active website. The Respondent has used the Domain Name for email communications that impersonate the Complainant and its employees. Specifically, emails were sent from the address [...]@bohler-edelstahl.com, creating the false impression that the email originated from [...]@bohler-edelstahl.com, to employees of the voestalpine Group, mimicking an employee of the Complainant and reproducing the Complainant's corporate signature and branding.

The registrant information for the Respondent disclosed by the Registrar contains multiple inconsistencies, including a non-existent street address, a United States telephone area code that does not correspond to the stated location, and an email address that does not match the disclosed registrant name.

5. Parties' Contentions

A. Complainant

The Complainant contends that the Domain Name is confusingly similar to the Marks, that the Respondent has no rights or legitimate interests in respect of the Domain Name, and that the Respondent registered and is using the Domain Name in bad faith.

B. Respondent

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

6. Discussion and Findings

For this Complaint to succeed in relation to the Domain Name the Complainant must prove that:

- (i) the Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the Domain Name; and
- (iii) the 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.

Ignoring the generic Top-Level Domain ".com", the Domain Name comprises the entirety of the text element of the Complainant's BÖHLER and device mark, with the addition of the term "edeistahl", a misspelling of the term "edelstahl" (meaning "stainless steel" in the German language), part of the Complainant's corporate name and domain name. The Domain Name also comprises the entirety of the dominant part of the Complainant's BÖHLER EDELSTAHL. FÜR DIE BESTEN DER WELT mark, with the substitution of the letter "i" for the letter "l" in the word "edelstahl" and the omission of the term "für die besten der welt" (meaning "for the best in the world" in the German language). In the Panel's view neither the addition of the term "edeistahl" nor the substitution of the letter "i" for "l" (indicative of "typosquatting"), nor the omission of the term "für die besten der welt", prevents a finding of confusing similarity between the Domain Name and the Marks.

Accordingly, the Panel finds that the Domain Name is confusingly similar to a trademark in which the Complainant has rights, and 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. Accordingly, 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.

The Complainant has made out a prima facie case that the Respondent has no rights or legitimate interests in respect of the Domain Name. The Complainant has never authorized, licensed, or permitted the Respondent to use its BÖHLER trademark or to register any domain name incorporating it. There is no evidence that the Respondent is commonly known by the Domain Name or holds any trademark rights corresponding to it.

The evidence demonstrates that the Respondent has used the Domain Name to impersonate the Complainant and its employees by sending emails that falsely appear to originate from the Complainant's official email infrastructure. Such use of a confusingly similar domain name for fraudulent impersonation and phishing cannot constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use. On the contrary, such conduct demonstrates a lack of rights or legitimate interests. See [WIPO Overview 3.0](#), section 2.13.

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 Domain Name such as those enumerated in the Policy or otherwise.

The Panel finds that the Respondent has no rights or legitimate interests in the Domain Name and the second element of the Policy is satisfied.

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 light of the nature of the Domain Name and the use to which the Respondent has put the Domain Name, for emails impersonating an employee of the Complainant, and the notoriety of the BÖHLER brand, the Panel is in no doubt that the Respondent had the Complainant and its rights in the Marks in mind when it registered the Domain Name.

Typosquatting, the practice of registering domain names that are typographical variations of well-known marks, is an indication of bad faith. See [WIPO Overview 3.0](#), section 3.2.1. Furthermore, the Respondent has used the Domain Name for impersonation and/or phishing by sending emails purporting to be from an employee of the Complainant, falsely displaying the sender address as that of the genuine employee. Such fraudulent impersonation again constitutes bad faith use under the Policy. [WIPO Overview 3.0](#), section 3.4.

Finally, the Complainant has adduced evidence that the registrant information provided by the Respondent is false and inconsistent and Panels have found that the provision of false contact details can again be an indication of bad faith. [WIPO Overview 3.0](#), section 3.6

Accordingly, the Panel finds the Respondent's registration and use of the Domain Name constitutes bad faith under the Policy and 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 Domain Name <bohler-edeistahl.com> be transferred to the Complainant.

/Ian Lowe/

Ian Lowe

Sole Panelist

Date: February 16, 2026