

ADMINISTRATIVE PANEL DECISION

Stichting BDO v. Aleksey Sidorov
Case No. D2026-0001

1. The Parties

The Complainant is Stichting BDO, Netherlands (Kingdom of the), represented by McDermott Will & Schulte LLP, United States of America (“United States”).

The Respondent is Aleksey Sidorov, Ukraine.

2. The Domain Name and Registrar

The disputed domain name <bdo-gf.com> is registered with Metaregistrar BV (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 1, 2026. On January 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 5, 2026, 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 (Unidentified registrant of BDO-gf.com) 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 9, 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 14, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 3, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on February 4, 2026.

The Center appointed Anne-Virginie La Spada as the sole panelist in this matter on February 16, 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's international network of financial services firms was founded in 1963 and provides financial services under the name BDO. The BDO network has offices across 164 countries around the world.

The Complainant is the owner of the following trademark registrations, among others:

- United States Trademark Registration No. 4,854,142 for BDO, registered on November 17, 2015, in classes 9, 16, 35, 36, 41, 42 and 45; and
- United States Trademark Registration No. 2,699,812 for BDO & design, registered on March 25, 2003, in classes 9, 16, 35, 36, 41 and 42.

The Complainant operates an official website at "www.bdo.com". The corresponding domain name was registered on February 28, 1995.

The disputed domain name was registered on December 15, 2025.

At the time of filing of the Complaint, the disputed domain name resolved to an inactive page indicating "this site can't be reached". Earlier, the disputed domain name used to resolve to a website displaying the BDO logo and the mention "BDO FINANCE". The website invited Internet to open an account.

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 the disputed domain name is confusingly similar to its well-known registered trademark BDO, the adjunction of the element "gf" (presumably referring to "global finance") not being suitable to prevent a finding of confusing similarity between the disputed domain name and the trademark.

The Complainant asserts furthermore that the Respondent is not sponsored by or affiliated with the Complainant in any way. The Complainant has not given the Respondent permission to use the Complainant's trademark in any manner, including in domain names, and the Respondent is not commonly known by the disputed domain name, which evidences a lack of rights or legitimate interests. The Complainant also observes that the Respondent directs Internet users to a blank page that lacks content. The Respondent has thus failed to make use of the disputed domain name and has not demonstrated any attempt to make legitimate use of the disputed domain name and website, which is further evidence of a lack of rights or legitimate interests in the disputed domain name. In addition, the disputed domain name used to resolve to a website displaying the BDO logo and the mention of "BDO FINANCE", which amounts to passing off and cannot be considered as a legitimate use.

Finally, the Complainant contends that the Respondent has registered and uses the disputed domain name in bad faith. The Complainant and its BDO trademark are well known internationally, with the consequence that the Respondent knew or should have known of the existence of the Complainant and its trademark when it registered the disputed domain name. Through its initial use, the Respondent intentionally attempted to attract Internet users to its website by creating a likelihood of confusion with the Complainant's mark.

B. Respondent

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

6. Discussion and Findings

6.1. Procedural Issue – Location of Respondent

Under paragraph 10 of the Rules, the Panel is required to ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case, and also that the administrative proceedings take place with due expedition.

The location of the Respondent disclosed by the Registrar appears to be in Ukraine, which is subject to an international conflict at the date of this Decision that may impact case notification. It is therefore appropriate for the Panel to consider, in accordance with its discretion under paragraph 10 of the Rules, whether the proceedings should continue.

Having considered all the circumstances of the case, the Panel is of the view that they should. The Panel notes that the Center notified the Respondent of the Complaint using all reasonably available means and nothing in the available record suggests that the email notification did not reach the Respondent's email address as listed in the registration records for the disputed domain name.

Furthermore, the Panel notes that the disputed domain name was registered as recently as December 15, 2025, during the international conflict, suggesting that the Respondent has Internet access, and is able to maintain control of the disputed domain name (noting also the use of the disputed domain name has changed).

The Panel also points out that, for the reasons which are set out later in this Decision, the Panel has no serious doubt that the Respondent registered and has used the disputed domain name in bad faith and with the intention of unfairly targeting the Complainant's trademark.

The Panel concludes that the Parties have been given a fair opportunity to present their case, and so that the administrative proceeding takes place with due expedition, the Panel will proceed to a Decision accordingly.

6.2. Substantive Considerations

According to paragraph 4(a) of the Policy, a complainant must assert and prove each of the following:

- (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 Select UDRP Questions (["WIPO Overview 3.1"](#)), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the 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 3.1](#), section 1.7.

Although the addition of other terms (here, "gf") 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 3.1](#), 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 3.1](#), 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.

Indeed, based on the information submitted by the Complainant, the Complainant has not granted the Respondent authorization or license to use its trademark within the disputed domain name nor has the Complainant acquiesced in any way to such use. Moreover, there is no evidence indicating that the Respondent is commonly known by the disputed domain name.

Furthermore, based on the evidence provided by the Complainant, it appears that the Respondent has used the disputed domain name in connection with a website displaying on its home page the Complainant's logo, as well as the mentions "BDO FINANCE" and "open an account", thus creating the impression of an official website, operated or at least endorsed by the Complainant. Panels have held that the use of a domain name for illegal activity (including passing off) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

Finally, the Respondent did not file a Response to the Complaint. The Panel may draw from the lack of a Response the inferences that it considers appropriate, according to the Rules, paragraph 14(b).

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 considers that the Respondent was aware of the Complainant's distinctive trademark BDO at the time it registered the disputed domain name, given the reputation of this mark throughout the world. The Panel finds it thus unlikely that the disputed domain name was chosen independently without reference to the Complainant's trademark, especially in view of the use the disputed domain name was put to. The Panel therefore accepts that the Respondent was aware of the existence of the Complainant and of its BDO trademark at the time of the registration of the disputed domain name.

In addition, the elements provided by the Complainant show that the disputed domain name used to resolve to a website reproducing the Complainant's trademark and logo in connection with financial services and an offer to "open an account", thus creating the impression of an official website, operated or at least endorsed by the Complainant. Such use of the disputed domain name amounts to passing off. Accordingly, the Respondent has intentionally attempted to attract Internet users to its website for commercial gain by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website, a behavior which constitutes use in bad faith according to paragraph 4(b)(iv) of 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 <bdo-gf.com> be transferred to the Complainant.

/Anne-Virginie La Spada/

Anne-Virginie La Spada

Sole Panelist

Date: March 2, 2026