

## **ADMINISTRATIVE PANEL DECISION**

### **Archer-Daniels-Midland Company v. Royal Life Shipping Case No. D2026-0140**

#### **1. The Parties**

The Complainant is Archer-Daniels-Midland Company, United States of America, represented by Innis Law Group LLC, United States of America (the “United States”).

The Respondent is Royal Life Shipping, Germany.

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

The disputed domain name <adm-ca.com> is registered with Hostinger Operations, UAB (the “Registrar”).

#### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 13, 2026. On January 14, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 15, 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 (Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 26, 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 amendment to the Complaint on January 27, 2026.

The Center verified that the Complaint together with the amendment to the 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 30, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 19, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on February 24, 2026.

The Center appointed Meera Chature Sankhari as the sole panelist in this matter on March 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, Archer-Daniels-Midland Company, was founded in 1902 and is now present in 200 countries. It owns more than 800 facilities worldwide, employs over 38,000 people, and is one of the world's most premier agribusinesses. The Respondent registered the disputed domain name, and subsequently created a webpage which was promoted on a WhatsApp group using the Complainant's name ADM and logo. Further, an email address connected to the disputed domain name using the term "exports", appeared as the contact for the WhatsApp business user named "Archer Daniels Midland (ADM)" with a contact photo of the Complainant's "ADM" Mark. The WhatsApp page also included the Canadian address for ADM Agri-Industries and a link to the Complainant's official webpage.

The Complainant stated that it has seen a large uptick in cases involving fraudulent schemes, impersonation of the Complainant's employees, and attempts to divert funds or place fraudulent orders over the last year. Further, the Complainant submits that it has instituted proceedings against several domain names using their ADM Mark and prevailed.

The Complainant submitted that due to its promotion and continued global use of its name and brands, the Complainant has built international goodwill and reliability in their "ADM" Mark among its consumers, wherein the "ADM" Mark has been declared as a well-known mark. Further, the Complainant maintains an online presence through its various websites along with its main website, "www.adm.com". The website provides the history of the Complainant and describes their vast array of products and services and provides consumers with the latest news on Archer-Daniels-Midland Company. The Complainant also submits that it was originally a food and ingredients company but has now expanded to printing and publishing; financial and business management services; fuel production, including bioethanol and biodiesel; logistics services (agricultural storage and transportation services); and research and development services.

The Complainant submits that the ADM Mark was adopted and has been continuously used in the United States since 1923 in connection with numerous products and services. The Complainant contends that it owns numerous trademark registrations for the ADM Mark in the United States for a wide range of goods and services and is largely recognized on an international scale. The Complainant's ADM Mark has been registered since March 18, 1986, ADM (United States Trademark Registration No. 1386430), with a first use date at least as early as 1923. Further, the Complainant has submitted that it owns numerous worldwide registrations that cover a wide range of goods and services, including registration no. TMA697624 (word mark, registered on October 2, 2007), TMA820225 (word mark, registered on March 20, 2012), and TMA707334 in Canada (figurative mark, registered on February 13, 2008) for the "ADM" word mark and "ADM" logos respectively.

Further, the Complainant has successfully brought multiple similar UDRP complaints in recent years.

#### **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. The Complainant submits that it has been using the <adm.com> domain name regularly and communicates using the official "@adm.com" email and displaying, inter alia, the ADM logo in the signature of those emails. The Complainant further contends that the disputed domain name completely incorporates the ADM Mark and forms the most prominent and recognizable portion of the disputed domain name. Moreover, the Respondent has used the Complainant's name and registered trademarks on WhatsApp along with the email address "[...]@adm-ca.com", the address for ADM Agri-Industries, and a link to one of the official webpages of the Complainant.

It is submitted that the addition of “-CA” in the disputed domain name does not distinguish the domain from the Complainant’s “ADM” Mark and was intentionally used, given that it is a global business with presence in Canada and that inclusion of the country code, “-CA” may increase the confusing similarity. The Complainant also submits that the disputed domain name and the Complainant’s ADM Mark are visually, conceptually identical and phonetically similar. It is also contended that the Respondent is targeting individuals who would like to connect with the Complainant and any individual who encounters the website or email associated with the disputed domain name could be misled into believing that the site is somehow affiliated with the Complainant when there is none.

The Complainant states that after registering the disputed domain name on July 24, 2025, the Respondent created a fraudulent website that appears to be a placeholder. Additionally, the Respondent displays an email address “[...]@adm-ca.com” on a WhatsApp page and uses the Complainant’s name, registered trademark logo, as well as an the official Canadian address for ADM Argi-Industries. The Complainant contends that the WhatsApp page as well as the disputed domain name are being used and registered in bad faith. Given the worldwide fame of the Complainant and its ADM Marks, the Respondent was certainly aware of Complainant’s rights in the ADM Marks and company name prior to registering the disputed domain name.

## **B. Respondent**

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

## **6. Discussion and Findings**

### **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 (“-ca”) 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 that 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.

The use of the term “-ca” may lead the consumers to believe that the domain name consists of the country code for Canada and is specifically being used by the Complainant for its presence there. [WIPO Overview 3.1](#), section 2.5.1. Furthermore, panels have held that the use of a domain name for illegitimate activity (here, claimed passing off), can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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 intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the complainant's mark and the disputed domain name. The evidence of use through the WhatsApp messaging platform, where an email address connected to the disputed domain name is reproduced along the use of the Complainant's registered trademarks, both ADM word and logo as well as the use of the Complainant's official Canadian address displayed on the WhatsApp group support the Panel's finding of bad faith on the part of the Respondent.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith such as noted above. [WIPO Overview 3.1](#), section 3.2.1.

Panels have held that the use of a domain name for illegitimate activity (here, claimed passing off) constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

In the present case, the Panel notes that the Respondent has registered the disputed domain name incorporating the whole of the Complainant's mark and has intentionally set up a modus operandi to impersonate the Complainant (or a company belonging to the Complainant's group) and displaying the official domain name and address of the Complainant.

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 <adm-ca.com> be transferred to the Complainant

*/Meera Chature Sankhari/*

**Meera Chature Sankhari**

Sole Panelist

Date: March 9, 2026