ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Alstom v. Name Redacted
Case No. D2026-0217

1. The Parties

The Complainant is Alstom, France, represented by Lynde & Associes, France.

The Respondent is Name Redacted[1].

2. The Domain Name and Registrar

The disputed domain name <asltomsgroup.com> 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 January 20, 2026. On January 20, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 20, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 21, 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 23, 2026.

[1] The underlying registrant of the disputed domain name appears to have used the name and contact details of a third party when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted the name of the Respondent from this Decision. However, the Panel has attached as Annex 1 to this Decision an instruction to the concerned Registrar regarding transfer of the disputed domain name, which includes the name provided as the registrant of the disputed domain name. The Panel has authorized the Center to transmit Annex 1 to the concerned Registrar as part of the order in these proceedings, and has indicated that Annex 1 to this Decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. D2009-1788.

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 26, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 15, 2026. The Respondent sent an email communication to the Center on January 27, 2026. The Center notified the Parties of the commencement of panel appointment process on February 16, 2026.

The Center appointed Geert Glas as the sole panelist in this matter on February 20, 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 a French multinational manufacturer of rail transport systems, created in 1928. It is active in the fields of passenger transportation, rail transportation and locomotives, producing trains as well as trams. It is a prominent company in the world of transport infrastructures, employing 34,000 professionals in more than 60 countries and playing a significant role in the manufacture and overhaul of rolling stock.

The Complainant is the owner of a large number of national and international trademark registrations which consist of the word "ALSTOM" and cover an extensive range of goods and services. These trademark registrations include:

- International trademark ALSTOM No. 706292 registered on August 28,1998, duly renewed, designating a large number of countries including China, Egypt, Democratic People's Republic of Korea, Japan, Mexico, Morocco, Russian Federation, Thailand, Viet Nam, and the United Kingdom;

- European Union Trade Mark ALSTOM No. 000948729 filed on September 30, 1998, duly renewed; and

- United States of America trademark ALSTOM No. 75565686 filed on October 9, 1998, duly renewed.

The Complainant owns a large number of subsidiaries who use in their company names ALSTOM such as Alstom Transport Technologies, Alstom Power Systems, Alstom Holdings, Alstom Shipworks, and Alstom APTIS. The name Alstom Group is widely used by the Complainant to designate the group of its subsidiaries.

The Complainant also operates, among others, the domain names <alstom.com>, registered on January 20, 1998, and <alstomgroup.com>, registered on November 14, 2000. Both these domain names redirect to the Complainant's group website.

The disputed domain name was registered on October 2, 2025. On November 14, 2025, the Complainant sent a trademark claim to the Respondent but no response was received.

It appears from the evidence provided by the Complainant that no use is being made of the disputed domain name. Indeed, the disputed domain name only resolves to an inactive website.

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 numerous well-known ALSTOM trademarks as it imitates the Complainant's ALSTOM trademarks by reproducing this with a spelling error as in a typical case of typosquatting ("asltoms"). The reversal of the letters "s" and "l" at the beginning and the addition of the letter "s" in the middle of the disputed domain name are barely noticeable visually. This may lead Internet users to read the disputed domain name as <alstomgroup.com> which is the Complainant's domain name which resolves to its main website.

The Complainant also contends that the Respondent is not affiliated in any way to the Complainant and that it never authorized a third party to register a domain name composed of its mark ALSTOM. The Complainant thereby points out that the disputed domain name is inactive since its registration date which would indicate that the Respondent has not made use of or prepared to use the disputed domain name in connection with a bona fide offering of goods or services.

In view of the well-known character of the name ALSTOM, the Complainant argues that it is virtually impossible that the Respondent was not aware of the Complainant's activities, at the time it registered the disputed domain name. Reference is also made to the fact that the disputed domain name is inactive and that the Respondent is trying to conceal its identity. As a result, the Complainant concludes that the disputed domain name was registered and is being used in bad faith.

B. Respondent

The Respondent did not formally reply to the Complainant's contentions, however sent an email communication to the Center stating that it is a small athletic club and that its email account was hacked at the time of the registration of the disputed domain name and it has no knowledge of or desire to keep the disputed domain name.

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 Panel finds the ALSTOM mark is recognizable 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. Indeed, the inversion of the letters "s" and "l" at the beginning of the disputed domain name and the addition of a letter "s" results in a variation of the ALSTOM mark; the disputed domain name contains sufficiently recognizable aspects of this mark to confuse users seeking or expecting the Complainant. WIPO Overview 3.1, section 1.9.

Although the addition of the term “group” 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.

There is indeed no evidence whatsoever of the Respondent being permitted to use the disputed domain name, or using the disputed domain name (or having demonstrable plans for such use) in the framework of a bona fide offering of goods or services, or being commonly known by the disputed domain name, or making a legitimate noncommercial or fair use of the disputed domain name.

To the contrary, (i) the disputed domain name seems to be a deliberate misspelling of the ALSTOM mark and (ii) the addition of the word “group” corresponds with the Complainant’s practice of referring to the group of its subsidiaries as the Alstom Group as evidenced by its <alstomgroup.com> domain name which resolves to its main website as does its <alstom.com> domain name.

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.

As to the registration of the disputed domain name, it should be noted that panels have consistently found that the mere registration of a domain name which is confusingly similar (particularly domain names comprising typos) to a famous or widely known trademark by an unaffiliated entity can by itself create a presumption of bad faith. WIPO Overview 3.1, section 3.1.4.

This is clearly the case here, as ALSTOM had become a widely known trademark long before the disputed domain name was registered. As a result, the Respondent knew or should have known that its registration of the disputed domain name would be confusingly similar to the Complainant’s mark. It should be noted that in the present case this knowledge can also be deduced from the fact that the Respondent seems to have intentionally misspelt the Complainant’s trademark when registering the disputed domain name and opted to

insert the term “group” in the disputed domain name, which term is also frequently used by the Complainant when referring to the entirety of its subsidiaries as the Alstom Group. This shows the intention of the Respondent, already when registering the disputed domain name, to create a likelihood of confusion with the Complainant and its ALSTOM mark.

Based on the available record, the Panel finds that the disputed domain name has been registered in bad faith.

Panels have found that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. Factors that have been considered relevant in applying the passive holding doctrine include: (i) the degree of distinctiveness or reputation of the complainant’s mark, (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, (iii) the respondent’s taking active steps to conceal its identity or (iv) the use of false or inaccurate contact details (noted to be a breach of the respondent’s registration agreement). WIPO Overview 3.1, section 3.3.

Having reviewed the available record, the Panel notes both the distinctiveness and reputation of the Complainant’s ALSTOM trademark, the failure of the Respondent to submit any response, and the use of a third party name and email address when registering the disputed domain name. In the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Moreover, one cannot think of a use to which the disputed domain name could be put which would be bona fide or would not create a likelihood of confusion with the Complainant.

Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain name constitutes bad faith under 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 <asltomsgroup.com> be transferred to the Complainant.

/Geert Glas/
Geert Glas
Sole Panelist
Date: February 27, 2026