

ADMINISTRATIVE PANEL DECISION

Alfa Laval Corporate AB v. Jude Duke
Case No. D2026-0871

1. The Parties

The Complainant is Alfa Laval Corporate AB, Sweden, represented by Advokatbyrå Gulliksson AB, Sweden.

The Respondent is Jude Duke, Australia.

2. The Domain Name and Registrar

The disputed domain name <alfclaval.com> is registered with Realtime Register B.V. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 27, 2026. On February 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 2, 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 (The RDAP server redacted the value) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 2, 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 March 4, 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 March 9, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 29, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 30, 2026.

The Center appointed María Alejandra López García as the sole panelist in this matter on April 7, 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 Swedish company established in 1883 that operates a global business in key technology areas of heat transfer, separation, and gas and fluid handling across many industries, including, but not limited to, the marine, environmental, pharma, hygienic, food, and energy sectors. The Complainant filed its first application for the ALFA LAVAL trademark in 1897; it has been extensively used for more than 100 years, and its reputation has been recognized in many countries, including by courts and previous UDRP panelists.¹

The Complainant owns the ALFA LAVAL trademark in multiple jurisdictions around the world (over 200 registrations), including but not limited to:

- Swedish Trademark for ALFA LAVAL (figurative), Registration No. 6089, registered on December 13, 1897, in International Classes (“ICs”) 7 and 11;
- European Union Trademark (EUIPO) for ALFA LAVAL (word mark), Registration No. 003481702, registered on March 3, 2005; in ICs 1, 6, 7, 9, 11, 37 and 42; and
- Australian Trademark for ALFA LAVAL (word mark), Registration No. 288016, registered on June 12, 1975; in IC 11.

The Complainant also owns other domain names incorporating the ALFA LAVAL trademark as <alfalaval.com>, for its main website. The Complainant’s trademark has also been registered under country code top-level domains (ccTLDs), such as <.us>, <.co.uk>, and <.cn>.

The disputed domain name was registered on February 2, 2026, and at the time of this Decision resolves to an inactive website with no content on it. The Complainant has provided evidence that the disputed domain name has been used for a Business Email Compromise (“BEC”) attack².

The disclosed Respondent seems to be an unrelated individual located in Australia.

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 almost identical to the Complainant’s trademark ALFA LAVAL, which is a well-known trademark that enjoys a strong and worldwide recognition; that the Respondent doesn’t have any rights or legitimate interest as set out by the Policy; that the disputed domain name has been registered and used in bad faith, given that the Complainant’s trademark is well-known, and the disputed domain name has being used to defraud the Complainant’s customers through a

¹ See *Alfa Laval Corporate AB v. Reema Walker*, *alfalaval.com*, WIPO Case No. [D2024-4366](#); *Alfa Laval Corporate AB v. Domain Privacy, Domain Privacy ApS / Prince Michael*, WIPO Case No. [D2017-1602](#).

² See ; *Nelson Mullins Riley & Scarborough LLP v. Sxill Lab, Sxilllab*, WIPO Case. No. [D2024-1257](#); *Alfa Laval Corporate AB v. mark demad*. WIPO Case No. [D2024-1245](#).

BEC attack to infiltrate one of the Complainant's employee's email correspondence with one of the Complainant's customers. The Respondent has used the name of an employee and the disputed domain name <alfclaval.com> and sent a fraudulent email.

B. Respondent

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

6. Discussion and Findings

Under the Policy, the Complainant is required to prove on the balance of probabilities³ that:

- (i) the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed 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 Panel finds the mark is recognizable within the disputed domain name. It is well-established that a domain name that consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. In this case, the only difference between the Complainant's well-known trademark ALFA LAVAL and the disputed domain name is the substitution of a single character, being the letter "c" for an "a". Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.9.

Concerning the generic Top-Level Domain (gTLD) ".com", it is well established that it is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

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

³ See [WIPO Overview 3.1](#), section 4.2.

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.

Panels have held that the use of a domain name for illegal activity here, claimed as impersonation (BEC attack), use of malware, or other types of fraud, 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, given the nature of the disputed domain name and the timing of its registration, it is evident that the Respondent fully targeted the Complainant's business and well-known ALFA LAVAL trademark, which predates the registration by over a century.

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. [WIPO Overview 3.1](#), section 3.2.1.

Panels have held that the use of a domain name for illegal activity here, claimed as impersonation (BEC attack), use of malware, or other types of fraud, 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.

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 <alfclaval.com> be transferred to the Complainant.

/María Alejandra López García/

María Alejandra López García

Sole Panelist

Date: April 9, 2026