

ADMINISTRATIVE PANEL DECISION

Archer-Daniels-Midland Company v. Musa Muhammed
Case No. D2026-0889

1. The Parties

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

The Respondent is Musa Muhammed, Nigeria.

2. The Domain Name and Registrar

The disputed domain name <admfoodprocessing.net> is registered with NameSilo, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 27, 2026. On March 2, 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 (Unknown) 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 3, 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 4, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 24, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 25, 2026.

The Center appointed Masato Dogauchi as the sole panelist in this matter on April 1, 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 founded in 1902, has been doing agribusiness, from originally a food and ingredients business to bioethanol and biodiesel business, agricultural storage and transportation business. The Complainant serves 200 countries, owns more than 800 facilities and employs over 38,000 people. The net sales of the Complainant were USD 93 billion in 2023.

The Complainant has registered its AMD trademark, such as:

- United States Trademark Registration No. 1,386,430 for ADM (word mark), registered on March 18, 1986;
- United States Trademark Registration No. 2,766,613 for ADM (word mark), registered on September 23, 2003; and
- United States Trademark Registration No. 2,301,968 for ADM (word mark), registered on December 21, 1999.

The Complainant maintains its main website at the domain name <adm.com>, which allows consumers and business associates to learn about and communicate with the Complainant.

The disputed domain name was registered on November 25, 2025. The Respondent created a fraudulent webpage using the name and trademark of the Complainant, and has engaged in fraudulent activities, including sending an email from the email address of “[..]@admfoodprocessing.net” using the name of a Complainant’s employee to a possible customer of the Complainant, in which a quote for a type of the Complainant’s product was requested with the logo, address and phone number of the Complainant. The disputed domain name resolves to a page with no contents at the time of this Decision.

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.

B. Respondent

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

6. Discussion and Findings

In accordance with the Rules, paragraph 15(a), a panel shall decide a case on the basis of the statements and documents submitted and in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable. Since the Respondent has not made any substantive arguments in this case, the following decision is rendered on the basis of the Complainant’s contentions and other evidence submitted by the Complainant.

In accordance with the Policy, paragraph 4(a), in order to qualify for a remedy, the Complainant must prove each of the following:

- (i) The disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (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 for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The disputed domain name is confusingly similar to the mark for the purposes of the Policy, since it includes the Complainant's ADM mark in its entirety. The addition of the terms "food processing" in the disputed domain name does not prevent this finding. [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 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 Complainant has been doing agribusiness since 1902, and at present serves 200 countries, owns more than 800 facilities, employs over 38,000 people, and had worldwide net sales of USD 93 billion in 2023. In consideration of these facts, it is unlikely that the Respondent was unaware of the Complainant's ADM trademark at the time of registration of the disputed domain name on November 25, 2025. Therefore, in the circumstances of this case, the Panel finds that the Respondent registered the disputed domain name in bad faith.

With regard to the requirement that the disputed domain name is being used in bad faith, the fact that the disputed domain name has been used as an email address from which a fraudulent email has been dispatched is enough to show that the Respondent's use of the disputed domain name is in bad faith.

Panels have held that the use of a domain name for illegitimate activity, such as sending deceptive emails, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. The Respondent's use of the disputed domain name as described above constitutes bad faith use.

Accordingly, the Panel finds the third element of the Policy has been established.

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 <admfoodprocessing.net> be transferred to the Complainant.

/Masato Dogauchi/

Masato Dogauchi

Sole Panelist

Date: April 7, 2026