

ADMINISTRATIVE PANEL DECISION

Ifchor Galbraiths UK Limited v. biz uae
Case No. D2026-0972

1. The Parties

The Complainant is Ifchor Galbraiths UK Limited, United Kingdom, represented by SafeNames Ltd., United Kingdom.

The Respondent is biz uae, United States of America (the “United States”).

2. The Domain Name and Registrar

The disputed domain name <ifchorgalbralths.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 6, 2026. On March 6, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 9, 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 (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 9, 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 10, 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 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 31, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 1, 2026.

The Center appointed Áron László as the sole panelist in this matter on April 10, 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 global shipping network based in the United Kingdom, formed by the merger of two leading companies in the shipping industry: Ifchor and Galbraiths. Ifchor was founded in 1977 in Switzerland and established itself as a global leader in shipbroking, dry bulk, and tankers. Galbraiths, based in London, had over 175 years of experience in the shipping industry and maintained a significant presence in the United Kingdom, specializing in shipbroking and maritime services. In 2022, the two firms merged to create IFCHOR GALBRAITHS, which allowed for expansion into areas such as environmental transition services, gas, offshore, and renewables. IFCHOR GALBRAITHS now operates a network of over 25 offices worldwide with over 300 employees. The Complainant's global presence spans across numerous countries, including China, Norway, Greece, the United States, India, and the Republic of Korea.

The Complainant was recognized as one of the Top Ten Shipbrokers in both 2023 and 2025 on the Lloyd's List. Following the merger, the Complainant has continued to expand and diversify its services through acquisitions, including the acquisition of Norway's UNO Offshore, now renamed IG Offshore.

The Complainant is the owner of the following figurative trademark registrations for IG IFCHOR GALBRAITHS ("IFCHOR GALBRAITHS" mark):

- Swiss Trademark IG IFCHOR GALBRAITHS (figurative) Reg. No. 814112, registered on May 7, 2024; and
- United Kingdom Trademark IG IFCHOR GALBRAITHS (figurative) Reg. No. UK00004046458, registered on July 26, 2024.

The Complainant actively promotes its activities online, including on its main domain name <ifchorgalbraiths.com>, registered on June 21, 2022. The Complainant also owns several other domain names incorporating the IFCHOR GALBRAITHS mark, including <ifchorgalbraiths.org>, <ifchorgalbraiths.net>, <ifchorgalbraiths.fr>, <ifchorgalbraiths.asia>, and <ifchor-galbraiths.com>. The Complainant's logo and trademark are prominently featured on its LinkedIn social media page, where it actively promotes its services under the IFCHOR GALBRAITHS name.

The disputed domain name <ifchorgalbraiths.com> was registered on January 26, 2026, with NameCheap, Inc. The disputed domain name currently fails to resolve and presents an error page. The disputed domain name previously had Mail eXchanger ("MX") records configured, meaning it was at one point capable of sending and receiving emails.

The Respondent is identified as "biz uae", located in the United States, as disclosed by the Registrar during the verification process. The Respondent's identity was initially concealed behind Privacy service provided by Withheld for Privacy ehf. The Respondent did not submit any response.

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 it owns figurative trademark registrations for IG IFCHOR GALBRAITHS in Switzerland and the United Kingdom, both in Class 39 and both predating the registration of

the disputed domain name. The disputed domain name replicates the IFCHOR GALBRAITHS mark with the sole substitution of the letter “l” in place of an “i”, which constitutes typosquatting. The generic Top-Level Domain (“gTLD”) “.com” should be disregarded as a standard registration requirement. The disputed domain name is therefore confusingly similar to the Complainant’s trademark.

Concerning the second element, the Complainant contends that the Respondent has no trademark rights, registered or unregistered, to the term “IFCHOR GALBRAITHS”, nor has the Respondent received any license from the Complainant to use the disputed domain name featuring the Complainant’s IFCHOR GALBRAITHS mark. The disputed domain name currently fails to resolve and has been placed into “client Hold” status by the Registrar, suggesting suspension. No goods or services are being offered. However, the disputed domain name previously had MX records configured, meaning it could send and receive emails. The terms used in the disputed domain name are nonsensical unless construed as a typosquatting variant of the Complainant’s mark, suggesting the Respondent intended to use the disputed domain name for deceptive or malicious activities, which cannot confer any rights or legitimate interests.

Concerning the third element, the Complainant contends that the IFCHOR GALBRAITHS mark is well known in the shipbroking industry, and all top results from a Google search pertain exclusively to the Complainant. There is no plausible explanation for the registration of the disputed domain name other than as an intentional misspelling of the Complainant’s mark. The Respondent ignored the Complainant’s cease-and-desist letter, which infers bad faith. Despite the lack of active usage, the Respondent’s passive use is in bad faith, given the Complainant’s strong reputation, the absence of any evidence of good-faith use, the Respondent’s concealment of its identity, and the implausibility of any legitimate use. The Respondent also provided incomplete registration details, including an address without a building number or street name and an improperly formatted phone number. Finally, the Respondent configured MX records on the disputed domain name upon registration, which, given the implied affiliation with the Complainant’s mark, suggests the disputed domain name could have been used for email-based impersonation.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to “decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable”.

Paragraph 4(a) of the Policy requires that a complainant must prove each of the following three elements to obtain an order that a domain name should be cancelled or transferred:

- i. the domain name registered by the respondent 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.

In view of the Respondent’s failure to submit a Response, the Panel shall decide this dispute on the basis of the Complainant’s undisputed representations pursuant to paragraphs 5(f), 14(a) and 15(a) of the Rules and draw such inferences as it considers appropriate pursuant to paragraph 14(b) of the Rules.

The Panel is entitled to accept all reasonable allegations set forth in a complaint. However, the Panel may deny relief where a complaint contains mere conclusory or unsubstantiated arguments. WIPO Overview of WIPO Panel Views on Select UDRP Questions ([“WIPO Overview 3.1”](#)), section 4.3.

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 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. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The disputed domain name differs from the Complainant's trademark in that it uses the letter "l" instead of the letter "i" (and omits the leading "IG" element in the figurative IFCHOR GALBRAITHS marks). The letter "l" can easily be mistaken for an "i", and the "IFCHOR GALBRAITHS" element of the Complainant's marks remains clearly recognizable. A domain name which consists of a variation of a trademark (typically a common, obvious, or intentional misspelling, referred to as typosquatting) is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. [WIPO Overview 3.1](#), section 1.9.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4I 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 Respondent's name does not correspond to the disputed domain name and there is no evidence that the Respondent is commonly known by it. The disputed domain name currently fails to resolve to any content, and no goods or services have been offered.

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.

Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a well-known trademark, and particularly in the case of coined or fanciful marks, can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4.

In this case, the Panel has noted that the Respondent more likely than not has registered the disputed domain name in order to attract Internet users by creating a likelihood of confusion with the Complainant's trademark. The disputed domain name incorporates differs from the from the Complainant's trademark in that it uses the letter "l" instead of the letter "i". The letter "l" can easily be mistaken for an "i". The Panel concludes on the balance of probabilities that the Respondent registered the disputed domain name with prior knowledge of the Complainant's trademark and with the intent to target it.

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. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case, in the absence of a response, the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Furthermore, the Respondent did not reply to the cease-and-desist letter, which further supports a finding of bad faith.

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 <ifchorgalbralths.com> be transferred to the Complainant.

/Áron László/

Áron László

Sole Panelist

Date: April 22, 2026