

ADMINISTRATIVE PANEL DECISION

Stichting BDO v. Chris Conmy
Case No. D2026-1063

1. The Parties

The Complainant is Stichting BDO, Netherlands (Kingdom of the), represented by Dechert LLP, United States of America (“United States”).

The Respondent is Chris Conmy, United States.

2. The Domain Name and Registrar

The disputed domain name <wealthbdo.com> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 12, 2026. On March 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 12, 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 (Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 13, 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 17, 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 27, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 16, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 17, 2026.

The Center appointed Yuri Chumak as the sole panelist in this matter on April 24, 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 an international network of financial services firms providing accounting, tax, advisory, and wealth management services under the BDO mark. The BDO network operates globally with offices in over 160 countries and has used the BDO mark for several decades.

The Complainant owns numerous trademark registrations for BDO, including:

1. United States trademark BDO, registration number 4,854,142, registered on November 17, 2015;
2. United States trademark BDO, design, registration number 2,699,812, registered on March 25, 2003;
3. United States trademark PEOPLE WHO KNOW, KNOW BDO., registration number 4,748,152, registered on June 2, 2015.

The Complainant operates its principal website at <bdo.com> and maintains a global portfolio of domain names incorporating the BDO mark.

The disputed domain name was registered on February 11, 2026.

The disputed domain name resolves to a website displaying the BDO mark together with the term “wealth”, and the message “Wealth BDO Partners is Launching Soon”, along with a copyright notice “Copyright © 2026 Wealth BDO - All Rights Reserved.”

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 BDO mark, incorporating the mark in its entirety together with the term “wealth”, which directly relates to the Complainant’s services.

The Complainant further submits that the Respondent has no rights or legitimate interests in the disputed domain name, is not commonly known by it, and is using it to impersonate the Complainant.

The Complainant contends that the disputed domain name was registered and is being used in bad faith, including by attempting to attract Internet users for commercial gain through confusion and by passing off as the Complainant.

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 the term "wealth" 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 Respondent is not affiliated with the Complainant and has not been authorized to use its mark. There is no evidence that the Respondent is commonly known by the disputed domain name.

The Respondent has used the disputed domain name for a website that reproduces the Complainant's mark and presents itself as associated with the Complainant. Such conduct does not constitute a bona fide offering or legitimate non-commercial use.

Panels have held that the use of a domain name for impersonation or 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 finds that the Respondent registered and is using the disputed domain name in bad faith.

The disputed domain name incorporates the Complainant's well-known BDO mark in its entirety together with a term directly linked to the Complainant's services. This supports a finding that the Respondent had the Complainant and its mark in mind at the time of registration.

The Respondent has used the disputed domain name to host a website that reproduces the Complainant's mark and suggests an affiliation with the Complainant. This constitutes an attempt to attract Internet users for commercial gain by creating a likelihood of confusion, within the meaning of paragraph 4(b)(iv) of the Policy.

Panels have held that the use of a domain name for impersonation or passing off constitutes 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 <wealthbdo.com> be transferred to the Complainant.

/Yuri Chumak/

Yuri Chumak

Sole Panelist

Date: May 4, 2026