

ADMINISTRATIVE PANEL DECISION

Archer-Daniels-Midland Company v. Archer Daniels Midland
Case No. D2026-1343

1. The Parties

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

The Respondent is Archer Daniels Midland, United States.

2. The Domain Name and Registrar

The disputed domain name <admsnutris.com> (the “Disputed Domain Name”) is registered with Name.com, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 27, 2026. On March 30, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 30, 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 (Redacted for Privacy, Domain Protection Services, Inc.) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 31, 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 31, 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 April 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 24, 2026.

The Center appointed Douglas M. Isenberg as the sole panelist in this matter on April 30, 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

Complainant provides extensive details about its background, its trademarks, its successes in previous proceedings under the Policy and what it describes as “a large uptick in cases involving fraudulent schemes, impersonation of [its] employees, and attempts to divert funds or place fraudulent orders over the last year.” The Panel finds it unnecessary to summarize everything that is in the Complaint (which, as noted below, exceeds the word count set in Supplemental Rule 11(a)) and instead will discuss only that which is necessary and/or appropriate in reaching its decision.

Complainant states that it “is widely known by its initials as ADM,” that it was founded in 1902 and that it “serves 200 countries, owns more than 800 facilities worldwide, employs over 38,000 people, and has become one of the world’s most premier agribusinesses.” Complainant further states that its “worldwide net sales” in 2023 were USD 93 billion. Further, Complainant states that although it “was originally a food and ingredients company, its business areas also now include printing and publishing; financial and business management services; fuel production, including bioethanol and biodiesel; logistics services (agricultural storage and transportation services); and research and development services.”

Complainant states, and provides documentation in support thereof, that it owns “numerous... worldwide registrations” for the mark “ADM” that “cover a wide range of goods and services,” including U.S. Reg. No. 1,386,430 for ADM (registered March 18, 1986) for use in connection with, inter alia, “chemicals for industrial use, namely, ethyl alcohol; ground-up corn cobs for use in further manufacture”; U.S. Reg. No. 2,766,613 for ADM (registered September 23, 2003) for use in connection with, inter alia, “financial and investment services, namely, providing financial information on the Internet”; and U.S. Reg. No. 2,307,492 for ADM (registered January 11, 2000) or use in connection with, inter alia, “information services in the field of employment rendered by means of a global computer information network.” These registrations are referred to herein as the “ADM Trademark.”

The Disputed Domain Name was registered on September 22, 2025. Complainant states, and provides documentation in support thereof, that the Respondent “sent two emails [using an email address that includes the Disputed Domain Name] purporting to be ADM and offering to sell large quantities of goods”; that “[t]he emails were signed by a fraudulent ADM sales representative under the fictitious name Shojaei Michael James”; and that “[t]he signature block in one of the emails included ADM’s name, registered trademark logo, the actual address for the ADM North American Headquarters, and links to ADM’s legitimate websites, ADM.COM and ADMADVANTAGE.COM, in order to appear as a legitimate ADM communication.” Complainant further states that “[u]pon information and belief, the Respondent in the present case is the same that has previously used the same fictitious name, Michael James Shojaei or Shojaei Michael James, to contact other third-party businesses in previous UDRP proceedings filed by ADM against ADMNUTRIS.COM; ADMNUTRIENS.COM; ADMNUTRIEN.COM; ADMNUTRI.COM; ADMNUTRIENT.COM; ADMNUTRIENTS.COM; and ADMSNUTRIENTS.COM in a similar fraudulent scheme involving the purchases of substantial quantities of goods.”

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 the ADM Trademark because the Disputed Domain Name “completely incorporates the ADM Mark, and the ADM portion of the domain is the most prominent and recognizable portion of the domain”; “[t]he addition of ‘S’ and ‘NUTRIS’ in ADMSNUTRIS.COM does nothing to distinguish the domain from the ADM Mark”; and “[i]t is clear... that Registrant’s use of ADM within the ADMSNUTRIS.COM domain was for the purpose of causing confusion.”
- The Respondent has no rights or legitimate interests in the Disputed Domain Name because, inter alia, “the Respondent has not been commonly known by the name,” which “is evident by the fact that it was registered and then used in the furtherance of a fraudulent scheme”; and “the Respondent is using the domain to deceive individuals and to tarnish the ADM Mark.”
- The Respondent registered and is using the Disputed Domain Name in bad faith because, inter alia, “[t]he Respondent is using the ADM Mark and name in the ADMSNUTRIS.COM domain and has misled or attempted to mislead a third-party into believing they were being offered the opportunity to purchase ADM goods.”

B. Respondent

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

6. Discussion and Findings

A. Preliminary Issue: Word Limit

Supplemental Rule 11(a) states that the substantive elements of a complaint under the Policy (regarding the three elements set forth in paragraph 4(a) thereof) shall be limited to 5,000 words. Here, Complainant has clearly exceeded this word count. While the Panel had considered issuing a procedural order requiring Complainant to submit a new complaint within the required word limit, ultimately the Panel concluded that it would be preferable to avoid this unnecessary task, given that Rule 10(a) grants the Panel the power to “conduct the administrative proceeding in such manner as it considers appropriate in accordance with the Policy and these Rules.” Nevertheless, the Panel reminds Complainant (and its legal representative) of this word limit with the hope and expectation that future complaints will not run afoul of any rules.

B. Identical or Confusingly Similar

Based upon the trademark registrations cited by the Complainant, it is apparent that the Complainant has rights in and to the ADM Trademark.

As to whether the Disputed Domain Name is identical or confusingly similar to the ADM Trademark, the relevant comparison to be made is with the Second-Level portion of the Disputed Domain Name only (i.e., “admsnutris”) because “[t]he applicable Top-Level Domain (‘TLD’) in a domain name (e.g., ‘.com’, ‘.club’, ‘.nyc’) is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test”. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 1.11.1.

As set forth in section 1.7 of [WIPO Overview 3.1](#): “in cases where a domain name incorporates the entirety of a trademark ..., the domain name will normally be considered confusingly similar to that mark.” Further, as set forth in section 1.8 of [WIPO Overview 3.1](#): “Where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element.” Finally, as set forth in section 1.15 of [WIPO Overview 3.1](#): where “the respondent has used the domain name in a manner that trades off the complainant’s rights (e.g., in an email impersonating the complainant), panels have found that such conduct affirms a finding of confusing similarity.”

Here, the Disputed Domain Name contains the ADM Trademark in its entirety, the addition of the other term(s) “snutris” do(es) not prevent a finding of confusing similarity; and Respondent has used the Disputed Domain Name in connection with a business compromise email impersonating Complainant.

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

C. Rights or Legitimate Interests

The Complainant has argued that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name because, inter alia, “the Respondent has not been commonly known by the name,” which “is evident by the fact that it was registered and then used in the furtherance of a fraudulent scheme”; and “the Respondent is using the domain to deceive individuals and to tarnish the ADM Mark.”

[WIPO Overview 3.1](#), section 2.1, states: “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 often impossible 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. If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element.”

The Panel finds that the Complainant has established its prima facie case and without any evidence from the Respondent to the contrary, the Panel is satisfied that the Complainant has satisfied the second element of the Policy.

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

D. Registered and Used in Bad Faith

Whether a domain name is registered and used in bad faith for purposes of the Policy may be determined by evaluating four (non-exhaustive) factors set forth in the Policy: (i) circumstances indicating that the registrant has registered or acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of the registrant’s documented out-of-pocket costs directly related to the domain name; or (ii) the registrant has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that the registrant has engaged in a pattern of such conduct; or (iii) the registrant has registered the domain name primarily for the purpose of disrupting the business of a competitor; or (iv) by using the domain name, the registrant has intentionally attempted to attract, for commercial gain, Internet users to the registrant’s website or other online location, by creating a likelihood of confusion with the complainant’s mark as to the source, sponsorship, affiliation, or endorsement of the registrant’s website or location or of a product or service on the registrant’s website or location. Policy, paragraph 4(b).

By using the Disputed Domain Name in connection with a business email compromise scam – a type of phishing activity – the Respondent has clearly acted in bad faith pursuant to paragraph 4(b)(iv) of the Policy. Indeed, as set forth in section 3.4 of [WIPO Overview 3.1](#), use of a disputed domain name in connection with “scams such as sending email, phishing, [or] identity theft,” including “to solicit payment of fraudulent invoices by the complainant’s actual or prospective customers,” constitutes bad faith. See also, e.g., *Syngenta Participations AG v. Guillaume Texier, Gobain Ltd*, WIPO Case No. [D2017-1147](#) (finding bad faith where “the disputed domain name was used... as an email address to send a request to an employee of the Complainant requesting urgent payment of monies claimed to be due on a false invoice”); *Kimley-Horn and Associates, Inc. v. Abraham Hashim*, WIPO Case No. [DCO2019-0017](#) (finding bad faith where respondent “posed as two of Complainant’s actual employees in order to send phishing emails to one of Complainant’s clients in an effort to obtain payment on an allegedly outstanding invoice”); and *BTWN Exhibits, LLC v. Registration Private, Domains By Proxy, LLC / Ahmed Fawzy, ASM Marketing*, WIPO Case No. [D2020-0036](#) (finding bad faith where “Respondent used the Domain Name to create an email address [and] send fraudulent emails to Complainant’s customers”).

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 <admsnutris.com> be transferred to the Complainant.

/Douglas M. Isenberg/

Douglas M. Isenberg

Sole Panelist

Date: May 7, 2026