

ADMINISTRATIVE PANEL DECISION

Stichting BDO v. Itay Rogers
Case No. D2026-2195

1. The Parties

The Complainant is Stichting BDO, Netherlands (Kingdom of the), represented by CSC Digital Brand Services Group AB, Sweden.

The Respondent is Itay Rogers, South Africa.

2. The Domain Name and Registrar

The disputed domain name <bdoglobalforensics-canada.com> is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 21, 2026. On May 21, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 22, 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 Purposes, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 22, 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 May 26, 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 June 1, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 21, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on June 22, 2026.

The Center appointed María Alejandra López García as the sole panelist in this matter on June 25, 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, founded in 1963, which operates under the name BDO. The Complainant's services include public accounting, tax, consulting, business advisory, and forensic and investigative consulting. The Complainant's BDO network has offices in 164 countries worldwide. In 2025, the Complainant's global revenue was USD16 billion.

The Complainant owns several trademark registrations for the term BDO, including but not limited to:

- European Union trademark for BOD (word mark), Registration No. 002419778, in International Classes ("ICs") 9, 16, 35, 36, 41, 42, registered on December 9, 2002, and in force until October 22, 2031;
- International trademark for BOD (work mark), Registration No. 770374, in ICs 9, 16, 35, 36, 41 and 42, registered on October 30, 2001, and in force until October 22, 2031;
- Canadian trademark for BOD (work mark), Registration No. TMA597044, in ICs 9, 16, 35, 36, 41, 42 and 45, registered on December 10, 2003, and in force until December 10, 2033;

The Complainant maintains an active Internet presence through its primary domain names <bdo.global> registered since August 25, 2014 and <bdoglobal.com> registered since July 31, 2003. Through such domain names, the Complainant hosts their primary websites to offer their services, including forensics and investigations consulting. The Complainant is also active through social networks such as LinkedIn, YouTube, and X.

The disputed domain name was registered on February 16, 2026, and resolves to an inactive website with no content.

The disclosed Respondent seems to be an individual identified as Itay Rogers, located in South Africa.

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 trademark BOD and that the addition of the terms "global forensics-canada" does not prevent a finding of confusion similarity between the disputed domain name and the trademark.

Furthermore, the Complainant contends that the Respondent is not sponsored by or affiliated with the Complainant in any way; that the Complainant has not licensed, authorized, or permitted the Respondent to register domain names incorporating the Complainant's trademark; that the Respondent is not commonly known by the disputed domain name, which evinces a lack of rights or legitimate interests; that the Respondent is using the disputed domain name to direct Internet users to a blank page lacking content, and with it, failing to demonstrate any attempt to make legitimate use of the domain name and website.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith given that the Complainant's BDO trademark is known internationally, and it has been registered in multiple jurisdictions; that the Complainant has registered and marketed this trademark since 1973, well before the Respondent registered the disputed domain name on February 16, 2026; that the composition of the disputed domain name confirms by itself the Respondent's knowledge of the Complainant's trademark BOD and business, which furthermore makes it illogical to believe that the Respondent registered the disputed domain name without specifically targeting the Complainant. Regarding its use, the Complainant contends that the disputed domain name has remained inactive, which constitutes bad faith under the Policy.

The Complainant, in an attempt to resolve the matter amicably, sent cease-and-desist letters to the Respondent through the concerned Registrar's platform form. Despite the Complainant's efforts, the Respondent did not provide any response to the Complainant.

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 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.

In accordance with paragraph 5(f) of the Rules, in the absence of a Response, the Panel shall decide the dispute based upon the Complaint. The complainant bears the burden of proof; a respondent's default does not, by itself, mean that the complainant is deemed to have prevailed. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)") section 4.3. Therefore, the Panel will decide this case based on the "balance of probabilities" or "preponderance of evidence" standard. See [WIPO Overview 3.1](#), section 4.2.

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.

Although the addition of other terms (here, "global forensics-canada") may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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 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.

The Panel notes that the Respondent identified in this case as “Itay Rogers” has also been part of a previous UDRP instance, i.e., *Stichting BDO v. Tarren Adriaanse, Tarren Adriaanse, Noor Brenner, Itay Rogers*, WIPO Case No. [D2025-4900](#), and with it falling into paragraph 4b(ii) of the Policy. See [WIPO Overview 3.1](#), section 3.1.2.

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.

In the present case, by the time the disputed domain name was registered on February 16, 2026, the Complainant had already acquired its trademark rights. The Panel notes that the disputed domain name’s composition itself confirms the Respondent’s specific knowledge of the Complainant’s trademark BOD and business, in particular in relation to forensic consulting in Canada, where, according to the evidence, the Complainant has offices in major cities like Toronto, Montreal, and Calgary (Annex 6.5). Therefore, the Panel finds that at the time of the disputed domain name registration, the Respondent knew the Complainant. See [WIPO Overview 3.1](#), section 3.2.2.

Panels have found that the non-use of a domain name (including a blank or “coming soon” page) 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 or reputation of the Complainant’s trademark and the composition of the disputed domain name and finds that, in the circumstances of this

case, the passive holding of the disputed domain name does not prevent a finding of 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 <bdoglobalforensics-canada.com> be transferred to the Complainant.

/María Alejandra López García/

María Alejandra López García

Sole Panelist

Date: July 7, 2026