

ADMINISTRATIVE PANEL DECISION

Volvo Trademark Holding Aktiebolag v. Jeff Lander
Case No. D2026-2411

1. The Parties

1.1 The Complainant is Volvo Trademark Holding Aktiebolag, Sweden, represented by Zacco Sweden AB, Sweden.

1.2 The Respondent is Jeff Lander, Panama.

2. The Domain Name and Registrar

2.1 The disputed domain name <vovlocars.com> (the “Disputed Domain Name”) is registered with Sea Wasp, LLC (the “Registrar”).

3. Procedural History

3.1 The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 3, 2026. On June 4, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain name. On June 8, 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 (Jewella Privacy - daedd) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 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 amendment to the Complaint on June 9, 2026.

3.2 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”).

3.3 In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on June 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 2, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 7, 2026.

3.4 The Center appointed Ike Ehiribe as the sole panelist in this matter on July 22, 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

4.1 The Complainant is Volvo Trademark Holding Aktiebolag with its principal place of business in Sweden. The Complainant is jointly and severally owned by AB Volvo (the Volvo Group) and the Volvo Car Corporation. The Complainant is described as the proprietor of the globally well-known VOLVO trademarks which have been registered for many decades throughout the world. The Complainant also licenses the rights to use the trademarks to its shareholders AB Volvo and Volvo Car Corporation. The VOLVO trademark enjoys a significant reputation worldwide and represents an enormous value for the Complainant since the VOLVO trademark has been used for nearly 100 years for a variety of products such as cars, trucks, buses, construction equipment, marine engines, and industrial power systems.

4.2 The VOLVO trademark was first registered as a combined trademark in Sweden on November 29, 1927, with the registration No. 33149, then as a word mark in Sweden on April 29, 1955, with the registration No. 78133 and then in the United States of America (“United States”) on October 23, 1956, with the registration No. 636129, and as a word and mark in the European Union on January 28, 2003, with the registration No. 002347193. The Complainant is also the owner of a substantial quantity of trademark registrations throughout the world for both the VOLVO word mark, the VOLVO figurative marks, and various registrations that include the VOLVO trademark in combination with other terms. The VOLVO trademark is generally regarded as one of the world’s most valuable brands going by various global rankings/surveys, e.g. the “Brand Finance Brand Directory” which in 2024 ranked the VOLVO trademark as the world’s 176th most valuable brand. The Volvo brand is also well-known in the United States in which the Complainant was ranked as the 16th popular car brand.

4.3 The Complainant owns the VOLVO trademark first registered about a century ago and also holds a registration for the trademark VOLVOCARS in Ireland, through registration No. 219,597, of August 23, 2000. The Complainant’s portfolio also includes a large number of domain names that incorporate the VOLVO mark such as <volvo.com> and <volvocars.com>, first registered in 1994 and is the primary corporate and commercial domain name of the Complainant’s corporation.

4.4 The Respondent is said to be located in Panama. The Respondent created the Disputed Domain Name <vovlocars.com> on April 28, 2003, which resolves to a webpage displaying pay-per-click (PPC) links.

5. Parties’ Contentions

A. Complainant

5.1 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 consists of the term “vovlocars” which is confusingly similar to the Complainant’s trademarks. The Complainant asserts that the Disputed Domain Name is a deliberate misspelling of the Complainant’s <volvocars.com> domain name. Following *Fuji Photo Film U.S.A. Inc. v. LaPorte Holdings*, WIPO Case No. [D2004-0971](#) or section 1.9 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), the Complainant therefore submits that a domain name which consists of a common, obvious or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element.

Secondly, it is argued that the mere addition of generic descriptive or geographical terms (such as “cars”) to a disputed domain name does not prevent a finding of confusing similarity. . It is also submitted that the addition of the generic Top-Level Domain (“gTLD”) “. com” does not prevent a finding of confusing similarity.

5.2 The Respondent has no rights or legitimate interests in the Disputed Domain Name considering that: (a) the Respondent has no license or authorization to use or register the VOLVO trademark as a domain name; (b) the Respondent is not an authorized representative of the Complainant’s products or services and has never had a business relationship with the Complainant; (c) the Respondent has not made any demonstrable preparations to use the Disputed Domain Name in connection with a *bona fide* offering of goods or services; (d) the Respondent is also using the Disputed Domain Name by redirecting it to a PPC advertisement website to generate traffic and or income; and (f) The Respondent has advertised the Disputed Domain Name for sale on a domain name marketplace.

5.3 On the question of bad faith registration and use, the Complainant submits as follows: (a) that since the Respondent registered the Disputed Domain Name on April 28, 2003 which is subsequent to when the Complainant first obtained trademark rights for the VOLVO trademark by many decades, and also subsequent to when the Complainant registered the <volvocars.com> domain name by nearly a decade, it is obvious that the Respondent was fully aware of the Complainant’s rights and interest in the VOLVO trademark at the date of registration of the Disputed Domain Name; (b) that the Respondent’s activities listed in paragraph 5.2 above ranging from directing the Disputed Domain Name to a PPC website for traffic or financial gain, and advertising the Disputed Domain Name for sale are all demonstrative of bad faith use; (c) the Respondent failed or refused to respond to a cease and desist letter sent by the Complainant on May 7 2026; and (d) that the Respondent by registering and using the Disputed Domain Name has intentionally attempted to attract for commercial gain, Internet users to its own website by creating a likelihood of confusion with the Complainant’s trademark as to the source, sponsorship, affiliation or endorsement of the Respondent’s website.

B. Respondent

5.4 The Respondent did not reply to the Complainant’s contentions and therefore, the Panel shall draw such adverse inferences from the Respondent’s failure to respond as may be deemed appropriate.

6. Discussion and Findings

A. Identical or Confusingly Similar

6.1 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 demonstrated extensive rights in respect of the VOLVO and VOLVOCARS trademarks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the marks are recognizable within the Disputed Domain Name. Accordingly, the Disputed Domain Name is confusingly similar to the mark for the purposes of the Policy. See [WIPO Overview 3.1](#), section 1.7 and section 1.9 on misspelling of a complainant’s trademark in a domain name.

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

B. Rights or Legitimate Interests

6.2 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 notes that the Disputed Domain Name is used to host a page with PPC links related to the Complainant’s activities, which does not represent a bona fide offering. [WIPO Overview 3.1](#), section 2.9.

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

C. Registered and Used in Bad Faith

6.3 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.

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, the Panel notes that the Respondent was definitely aware of the Complainant’s well-known VOLVO trademarks and domain names before electing to create the Disputed Domain Name on April 28, 2003, given the composition of the Disputed Domain Name which is a misspelling of the VOLVO trademark associated with the term “cars” which is descriptive of the Complainant’s activity. The Panel further notes that the Disputed Domain Name is also a misspelling of the Complainant’s VOLVOCARS trademark and prior domain name <volvocars.com>. The Panel therefore finds that the Respondent registered the Disputed Domain Name in bad faith. Furthermore, the Panel finds that the Respondent has used the Disputed Domain Name to attempt to attract for financial gain, Internet users by creating a likelihood of confusion with the Complainant’s trademarks to resolve to a page with PPC links, which is further evidence of bad faith use.

The Panel also finds that the Respondent’s refusal to respond to the Complainant’s recent cease and desist letter dated May 7, 2026 and to this Complaint constitute further evidence of bad faith registration and use.

The Panel finds that the Complainant has established the third element of the Policy.

7. Decision

7.1 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 <vovlocars.com> be transferred to the Complainant.

/Ike Ehiribe/

Ike Ehiribe

Sole Panelist

Date: August 12, 2026