

ADMINISTRATIVE PANEL DECISION

Volvo Trademark Holding Aktiebolag v. Zero Dark
Case No. D2026-3674

1. The Parties

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

The Respondent is Zero Dark, United States of America ("United States").

2. The Domain Name and Registrar

The disputed domain name <volv0.com> is registered with Gransy, s.r.o. d/b/a subreg.cz (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 17, 2026. On August 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 31, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 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 amendment to the Complaint on September 1, 2026.

The Center verified that the Complaint together with the amendment to the 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 September 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 25, 2026.

The Center appointed Tommaso La Scala as the sole panelist in this matter on September 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

The Complainant in this administrative proceeding is Volvo Trademark Holding Aktiebolag, a Swedish company jointly and equally owned by AB Volvo (the Volvo Group) and Volvo Car AB, which holds the VOLVO trademarks and licenses them to its shareholders for their respective businesses.

The VOLVO trademark has been used for nearly 100 years in connection with a wide variety of goods and services, such as cars, trucks, buses, construction equipment, marine engines and industrial power systems, and enjoys a worldwide reputation, as also recognized by previous UDRP panels (see, among others, *Volvo Trademark Holding AB v. Unasi, Inc.*, WIPO Case No. [D2005-0556](#)).

The Complainant owns a wide portfolio of trademark registrations for VOLVO all around the world, since 1927 (in Sweden), including - inter alia - the following:

- United States Trademark Registration No. 636129 for VOLVO (word), granted on October 23, 1956 and duly renewed;
- European Union Intellectual Property Office Registration No. 2347193 for VOLVO (word), granted on January 28, 2003 and duly renewed.

The Complainant's group also owns many domain names comprising the VOLVO trademark, such as <volvo.com>, registered in 1995, and <volvofinancialservices.com>.

The disputed domain name was registered on August 7, 2026, and it has been used to send fraudulent emails to third parties and attempted to create the false impression that the sender was an employee of the Complainant, the email communications displayed the Complainant's trademark and logo, business address, email address and the domain name <volvofinancialservices.com>, and contained misleading payment instructions. According to the record, the disputed domain name does not resolve to any active website and is currently on hold.

The Complainant submits that the Respondent's name and contact details appear to be inaccurate /misleading.

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:

- (a) the disputed domain name is confusingly similar to the Complainant's VOLVO trademark, being a deliberate misspelling thereof, making this a clear case of typosquatting;

(b) the Respondent lacks any rights or legitimate interests in the disputed domain name, having never been authorized by the Complainant and not being commonly known by the disputed domain name, which has been used to send phishing emails and attempted to create the false impression that the sender was an employee of the Complainant; and

(c) the Respondent registered and is using the disputed domain name in bad faith, namely for attempting to create the false impression that the sender was an employee of the Complainant in order to defraud third parties for financial gain, the provision of apparently false contact details being a further indication of bad faith.

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 the VOLVO trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The disputed domain name reproduces the VOLVO trademark with the sole substitution of the final letter "o" with the visually almost identical digit "0", while the generic Top-Level Domain ".com" is disregarded as a standard registration requirement. [WIPO Overview 3.1](#), section 1.11.1. This Panel agrees with the Complainant's assertion that the disputed domain name consists of an obvious and intentional misspelling of the Complainant's trademark – a typical instance of typosquatting – and that the mark remains clearly recognizable within the disputed domain name. 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. [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 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.

This Panel finds that the Complainant has made a prima facie case that the Respondent does not have rights or legitimate interests in the disputed domain name. As a matter of fact, the Respondent does not appear to be commonly known by the name “volv0” and/or any similar name. The Respondent has no connection to or affiliation with the Complainant, and the Complainant has not licensed or otherwise authorized the Respondent to use or register any domain name incorporating, or misspelling, the Complainant’s trademark. The Respondent does not appear to make any legitimate noncommercial or fair use of the disputed domain name, nor any use in connection with a bona fide offering of goods or services. Lastly, the Respondent has used the disputed domain name to create the false impression that the sender was an employee of the Complainant through fraudulent emails containing misleading payment instructions.

Having reviewed the available record and considering that 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 Complainant has established that the Respondent lacks rights or legitimate interests in the disputed domain name.

Panels have held that the use of a domain name for illegal activity, here passing off and phishing, 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.

The VOLVO trademark is distinctive and very well-known all around the world and was registered and used for decades before the registration of the disputed domain name. Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4. In any event, the Complainant has documented that the Respondent registered and used the disputed domain name to attempt to defraud third parties by creating the false impression that the sender was an employee of the Complainant through emails reproducing its trademark, logo, business address and official domain name. This conduct is, in the Panel’s view, sufficient to show that the Respondent not only knew of the Complainant and its trademark but intentionally targeted them.

Panels have held that the use of a domain name for illegal activity, here passing off and phishing, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

The Panel finds that the Respondent’s use of the disputed domain name constitutes a disruption of the Complainant’s business and qualifies as bad faith registration and use under the Policy.

Furthermore, the provision of apparently false contact details in the registration data and the Respondent’s failure to submit a response are further circumstances supporting a finding of bad faith. [WIPO Overview 3.1](#), section 3.2.1.

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

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 <volv0.com> be transferred to the Complainant.

/Tommaso La Scala/

Tommaso La Scala

Sole Panelist

Date: October 14, 2026