

## ADMINISTRATIVE PANEL DECISION

Allstate Insurance Company v. Nikita Bykadarov, Backlinkswappers, inc.,  
and Pranam Lipinski  
Case No. D2025-4591

### 1. The Parties

Complainant is Allstate Insurance Company, United States of America (“United States”), represented by SILKA AB, Sweden.

Respondents are Nikita Bykadarov, Backlinkswappers, inc., United States, and Pranam Lipinski, United States.

### 2. The Domain Names and Registrars

The disputed domain names <aipcrew.com>, <aiphq.com>, <aipsite.com>, <allstateidentityapp.top>, <allstateidentity.cfd>, <allstateidentity.click>, <allstateidentitycrew.top>, <allstateidentityhq.top>, <allstateidentityhub.top>, <allstateidentitylabs.top>, <allstateidentityprotectionapp.com>, <allstateidentityprotectioncrew.com>, <allstateidentityprotectionhq.com>, <allstateidentityprotectionhub.com>, <allstateidentityprotectionsite.com>, <allstateidentityprotectionteam.com>, <allstateidentity.sbs>, <allstateidentitiesite.top>, <allstateidentity-team.top>, <allstateidentityteam.top>, <allstateidentity.top>, <get-aipapp.com>, <get-aip.com>, <getaip.com>, <getaipcrew.com>, <get-aiphq.com>, <getaiphq.com>, <get-aiphub.com>, <get-aiplabs.com>, <getaiplabs.com>, <get-aipsite.com>, <getaipsite.com>, <get-aip-team.com>, <get-aipteam.com>, <getaip-team.com>, <getaipteam.com>, <getallstateidentityapp.top>, <getallstateidentitycrew.top>, <getallstateidentityhq.top>, <getallstateidentityhub.top>, <getallstateidentitylabs.top>, <get-allstateidentityprotectioncrew.com>, <getallstateidentityprotectioncrew.com>, <getallstateidentityprotectionhq.com>, <getallstateidentityprotectionhub.com>, <get-allstateidentityprotectionlabs.com>, <getallstateidentityprotectionlabs.com>, <getallstateidentityprotectionsite.com>, <getallstateidentityprotectionteam.com>, <getallstateidentitiesite.top>, <getallstateidentity-team.top>, <getallstateidentityteam.top>, <get-allstateidentity.top>, <getallstateidentity.top>, <meetaip.com>, <meetallstateidentityprotection.com>, <meetallstateidentity.top>, <openaipapp.com>, <openaipcrew.com>, <openaiphq.com>, <openaiphub.com>, <openaiplabs.com>, <openaipsite.com>, <openaip-team.com>, <openaipteam.com>, <openallstateidentityapp.top>, <openallstateidentitycrew.top>, <openallstateidentityhq.top>, <openallstateidentityhub.top>, <openallstateidentitylabs.top>, <openallstateidentityprotection.com>, <openallstateidentityprotectioncrew.com>, <openallstateidentityprotectionhq.com>, <openallstateidentityprotectionhub.com>.

<openallstateidentityprotectionlabs.com>, <openallstateidentityprotectionsite.com>, <openallstateidentityprotection-team.com>, <openallstateidentityprotectionteam.com>, <openallstateidentitysite.top>, <openallstateidentity-team.top>, <openallstateidentityteam.top>, <openallstateidentity.top>, <theallstateidentityprotection.com>, <theallstateidentityprotectionhub.com>, <theallstateidentityprotectionsite.com>, <theallstateidentityprotectionteam.com>, <theallstateidentity.top>, <tryaipapp.com>, <tryaip.com>, <tryaipcrew.com>, <tryaiphub.com>, <tryaiplabs.com>, <tryaipsite.com>, <tryaip-team.com>, <tryaipteam.com>, <tryallstateidentityapp.top>, <tryallstateidentitycrew.top>, <tryallstateidentityhq.top>, <tryallstateidentityhub.top>, <tryallstateidentitylabs.top>, <tryallstateidentityprotectioncrew.com>, <tryallstateidentityprotectionhq.com>, <tryallstateidentityprotectionhub.com>, <tryallstateidentityprotectionlabs.com>, <tryallstateidentityprotectionsite.com>, <tryallstateidentityprotectionteam.com>, <tryallstateidentitysite.top>, <tryallstateidentity-team.top>, <tryallstateidentityteam.top>, <tryallstateidentity.top>, <useaip.com>, <useaipcrew.com>, <useaiphub.com>, <useaiplabs.com>, <useaipsite.com>, <useaipteam.com>, <useallstateidentityapp.top>, <useallstateidentitycrew.top>, <useallstateidentityhq.top>, <useallstateidentityhub.top>, <useallstateidentitylabs.top>, <useallstateidentityprotectioncrew.com>, <useallstateidentityprotectionhub.com>, <useallstateidentityprotectionlabs.com>, <useallstateidentityprotection-team.com>, <useallstateidentity.top>, <useallstateidentitysite.top>, <useallstateidentityteam.top>, and <useallstateidentity-team.top> are registered with Dynadot Inc. (“Registrar 1”).

The disputed domain names <todayallstateidentityprotection.com>, <partnerallstateidprotection.com>, <workwithallstateidprotection.com>, <helloallstateidprotection.com>, <lifallstateidprotection.com>, <thinkallstateidentityprotection.com>, <goallstateidentityprotection.com>, <tryallstateidprotection.com>, <todayallstateidprotection.com>, <getallstateidentityprotection.com>, <helloallstateidentityprotection.com>, <nowallstateidentityprotection.com>, <getallstateidprotection.com>, <tryallstateidentityprotection.com>, <risingallstateidprotection.com>, <workwithallstateidentityprotection.com>, <nowallstateidprotection.com>, <partnerallstateidentityprotection.com>, <joinallstateidentityprotection.com>, <thinkallstateidprotection.com>, <lifallstateidentityprotection.com>, <goallstateidprotection.com>, <joinallstateidprotection.com>, and <risingallstateidentityprotection.com> are registered with GoDaddy.com, LLC (“Registrar 2”, and collectively with Registrar 1, the “Registrars”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 5, 2025. On November 6, 2025, the Center transmitted by email to the Registrars requests for registrar verification in connection with the disputed domain names. On November 6 and November 9, 2025, the Registrars transmitted by email to the Center their verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondents (REDACTED FOR PRIVACY, Super Privacy Service LTD c/o Dynadot and Registration Private, Domains By Proxy, LLC) and contact information in the Complaint.

The Center sent an email communication to Complainant on November 12, 2025, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting Complainant to either file separate complaints for the disputed domain names associated with a different underlying registrant or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. Complainant filed an amendment to the Complaint on November 14, 2025.

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 Respondents of the Complaint, and the proceedings commenced on November 21, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 11, 2025. Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on December 16, 2025.

The Center appointed Scott R. Austin as the sole panelist in this matter on December 23, 2025. 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**

Without contest by Respondents, Complainant asserts in its Complaint, as amended, and in its attached annexes provides sufficient evidence to support that:

Founded in 1931 and based in Northbrook, Illinois, United States, Complainant is one of the leading insurers in the United States, providing insurance and related risk protection services under the trademark ALLSTATE ("the ALLSTATE Mark") through operations spanning all 50 states as well as Canada. Complainant's services are delivered through a widespread network of agents who offer tailored advice and support to clients. As of 2024, Complainant had more than 27,700 direct agents and employed over 55,000 people to support 208 million active policies, and was ranked 187th on Forbes' Global 2000 list of largest public companies in the world.

Among Complainant's risk protection services incorporating its ALLSTATE Mark, is a proactive identity monitoring service that Complainant obtained in 2018 through the acquisition of InfoArmor, Inc., a leader in the identity protection industry, which Complainant has identified since 2020 as "ALLSTATE IDENTITY PROTECTION" (in which Complainant claims unregistered trademark rights), as well as its abbreviation, "AIP", using the initial letter of each term (collectively, the "ALLSTATE IDENTITY PROTECTION Mark"). Complainant's services enable those who purchase its identity protection system as "members" to manage their online privacy and protect their digital lives. The system monitors and detects high-risk activity involving each member's personally identifiable information (i.e. Social Security numbers, email addresses, usernames and passwords, credit and debit card numbers, financial accounts, government and medical ID numbers, IP addresses, gamer credentials, etc....), sending alerts and insights to help members with prevention and rapid restoration in the event an incident occurs affecting such information.

Complainant owns numerous currently active and incontestable registrations protecting the ALLSTATE Mark in the United States, where each of the Respondents is purportedly located, and many jurisdictions worldwide, including the following:

- United States Trademark Registration number 717,683, ALLSTATE, registered on June 27, 1961, for insurance services in International Class 36;
- Canadian Trademark Registration number TMA283788, ALLSTATE, registered on September 30, 1983, for services in International Classes 35, 36, 41 and 42; and
- European Union Trademark Registration number 000040527 ALLSTATE, registered on February 12, 1998, in International Class 36.

In addition to the above registrations demonstrating rights in its ALLSTATE Mark, Complainant asserts it has established common law rights in the ALLSTATE IDENTITY PROTECTION Mark because, through years of continuous, large-scale use, advertising and promotion resulting in demonstrated marketplace success and recognition, these unregistered Marks have obtained secondary meaning and have acquired distinctiveness to function as well-known source identifiers for Complainant's services among consumers, which distinctiveness predates the registration date of the disputed domain names.

Complainant also shows registration and use of numerous domain names consisting of or including the ALLSTATE Mark or the ALLSTATE IDENTITY PROTECTION Mark. Complainant established its online presence through registration of its official domain name <allstate.com> on May 10, 1995, and registered its official domain name <allstateidentityprotection.com> on March 18, 2019, to access its official website for the ALLSTATE IDENTITY PROTECTION services at “www.allstateidentityprotection.com” (the “Official ALLSTATE IDENTITY PROTECTION Website”) which Website promotes and provides information about its identity protection services. Complainant also acquired its corresponding official domain name <aip.com>, in 2020, used solely to redirect Internet traffic to access the Official ALLSTATE IDENTITY PROTECTION Website. Complainant’s official domain name <aip.com>, given its shorter, abbreviated form, is also used by Complainant to create email addresses for support services related to the Allstate Identity Protection services.

The disputed domain names were registered in batches between October 8, 2024 and July 31, 2025, over a very limited number of registration dates in close proximity within each batch. All disputed domain names were used to redirect or have redirected in the past to Complainant’s Official ALLSTATE IDENTITY PROTECTION Website “www.allstateidentityprotection.com”.<sup>1</sup> Complainant has also provided evidence showing that the disputed domain names <getallstateidentityprotectioncrew.com> and <tryallstateidentityprotectionteam.com> were later inactive.

## **5. Parties’ Contentions**

### **A. Complainant**

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain names.

Complainant holds numerous trademark registrations for trademark rights in the ALLSTATE Mark across many jurisdictions around the world and also claims common law rights in the ALLSTATE IDENTITY PROTECTION Mark. Complainant further relies on the goodwill and recognition that has been attained under the ALLSTATE Mark, which has become a distinctive identifier of its insurance and identity protection services.

Previous panels have acknowledged Complainant’s rights in and the value of the ALLSTATE Mark and its association with Complainant.

Complainant asserts that the disputed domain names are confusingly similar to the ALLSTATE Mark and the ALLSTATE IDENTITY PROTECTION Mark because each of the disputed domain names clearly and prominently encompass Complainant’s distinctive ALLSTATE or ALLSTATE IDENTITY PROTECTION Mark in full or predominant part, or the initial letters of ALLSTATE IDENTITY PROTECTION, followed or preceded by descriptive terms.

Complainant submits that there are no rights or legitimate interests held by any Respondent in respect of the disputed domain names. Neither Respondent identified is affiliated or otherwise connected with Complainant or commonly known by any of the disputed domain names. Nor does either Respondent have any authorization or license from Complainant to use the ALLSTATE Mark or the ALLSTATE IDENTITY PROTECTION Mark or to register any of the disputed domain names.

---

<sup>1</sup> The Panel notes that limited evidence of use was provided for three of the disputed domain names: <getallstateidentityprotectioncrew.com>, <allstateidentityprotectionapp.com> and <tryallstateidentityprotectionteam.com>. Complainant adds that these three disputed domain names were registered in the same May 11, 2025, batch of disputed domain name registrations with Registrar 1 as multiple other domain names (e.g., <get-allstateidentityprotectioncrew.com>) for which it documents redirect to the Official ALLSTATE IDENTITY PROTECTION Website.

Complainant further contends that because Respondents' disputed domain names reproduce Complainant's well-known ALLSTATE Mark, as well as the ALLSTATE IDENTITY PROTECTION Mark (including the abbreviation of the latter) to redirect users to Complainant's Official ALLSTATE IDENTITY PROTECTION Website, this is not a use in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use, and supports a finding that such details were chosen specifically to target Complainant.

Finally, Complainant contends to the extent that a "very limited number" of the disputed domain names are currently inactive, inactive use is not a bona fide offering of goods or services pursuant to the Policy and by itself does not demonstrate a legitimate noncommercial or fair use.

Complainant contends that the disputed domain names were registered and are being used in bad faith. First, Complainant contends registration in bad faith based on Respondents' registration of domain names which reproduce Complainant's well-known ALLSTATE Mark, as well as the ALLSTATE IDENTITY PROTECTION Mark (including in some cases the abbreviation of the latter) without the consent or authorization of Complainant, registered decades after ALLSTATE Mark has been registered globally, and at a time when the ALLSTATE IDENTITY PROTECTION brand was already popular and receiving awards and recognition making it implausible that Respondents were unaware of them when the disputed domain names were registered.

Complainant contends, therefore, that Respondents had Complainant and its ALLSTATE and ALLSTATE IDENTITY PROTECTION Marks in mind at the time of registration of the disputed domain names in bad faith with the intention of targeting Complainant's ALLSTATE Mark to trade off the goodwill and reputation attaching to Complainant, its ALLSTATE Mark and ALLSTATE IDENTITY PROTECTION Mark.

Finally, Complainant contends that Respondents' use of the disputed domain names is to capitalize on the reputation of Complainant's trademarks by diverting Internet users seeking Complainant's services for Respondents' financial gain. Complainant contends, therefore that Respondents conduct amounts to registration and use of each of the disputed domain names in bad faith.

Complainant requests that the disputes against registrants of the disputed domain names be consolidated on the basis that they are all under common control based on factors relied upon by prior UDRP panels in decisions upon such requests. Complainant's support for these factors is provided in substantial and detailed evidence submitted in the Annexes to its Complaint which are considered in detail by the Panel in section 6.1 below.

## **B. Respondents**

Respondents did not reply to Complainant's contentions.

## **6. Discussion and Findings**

In view of Respondents' failure to submit any Response, the Panel shall decide these administrative proceedings on the basis of Complainant's undisputed representations pursuant to paragraphs 5(f), 14(a) and 15(a) of the Rules and draw such inferences it considers appropriate pursuant to paragraph 14(b) of the Rules. The Panel is entitled to accept all reasonable allegations and inferences set forth in the Complaint as true unless the evidence is clearly contradictory. See *Talk City, Inc. v. Michael Robertson*, WIPO Case No. [D2000-0009](#); see also *Microsoft Corporation v. Freak Films Oy*, WIPO Case No. [D2003-0109](#).

Where no substantive Response is filed, however, Complainant must still make out its case in all respects under paragraph 4(a) of the Policy. To succeed, Complainant must demonstrate that all the elements listed in paragraph 4(a) of the Policy have been satisfied.

The Panel will address its findings on each of these requirements in more detail below.

The standard of proof under the Policy is often expressed as the “balance of the probabilities” or “preponderance of the evidence” standard. Under this standard, an asserting party needs to establish that it is more likely than not that the claimed fact is true. See, WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ([“WIPO Overview 3.0”](#)), section 4.2.

### **6.1. Consolidation: Multiple Respondents**

The Rules contemplate that a panel may consolidate multiple domain name disputes (Rules, paragraph 10(e)). Where multiple respondents are named, the consensus of prior UDRP panels is to look at the following key considerations: i) whether the domain names or corresponding websites appear to be under common control; ii) whether consolidation would be fair and equitable to all parties; and iii) whether consolidation would promote procedural efficiency. See [WIPO Overview 3.0](#), section 4.11.2.

In this case, Complainant draws upon these factors and based upon supporting evidence shown in the Annexes attached to the Complaint submits that the disputed domain names are subject to common control for the following reasons:

- (i) All the domain names have the same use: they redirect or have redirected in the past to the Official ALLSTATE IDENTITY PROTECTION Website;
- (ii) All 153 of the disputed domain names themselves share a similar format and lexical pattern involving the clearly recognizable ALLSTATE Mark or ALLSTATE IDENTITY PROTECTION Mark (or its abbreviated form) plus descriptive terms;
- (iii) Many of the disputed domain names are registered through the same Registrar on the same or similar dates within short periods of each other;
- (iv) Furthermore, following disclosure by the concerned Registrars in this case, Complainant persuasively shows in its amendment to its Complaint that the disclosed two underlying registrants named as Respondents herein appear to not only operate within the same business sector, conducting “cold email” campaigns, but also some form of relationship or collaboration between them, considering that one Respondent has participated in at least one webinar organized by the company of which the other Respondent is CEO;
- (v) Complainant also shows one of the Respondents, Nikita Bykadarov, has previously acted as respondent in proceedings under the UDRP. In *The Vanguard Group, Inc. v. Nikita Bykadarov / Backlinkswappers, Inc.*, FA2137458, where the Panel found Respondent Bykadarov had registered and used the disputed domain names in bad faith.

Overall, the Panel notes there is a high level of similarity between the composition of the disputed domain names, they redirect (or previously redirected) to Complainant’s Official ALLSTATE IDENTITY PROTECTION Website, many are registered within a relatively short period of each other with the same Registrar and many on the same date or within a few days of each other, the Panel finds that it is most likely that the disputed domain names and associated websites are under the common control of the same person or connected persons, the “Respondents”, especially considering the purported business sector professional relationship between them. None of the Respondents have challenged Complainant’s request for consolidation, and it is clearly most procedurally efficient, and considering all the circumstances, fair and equitable for the disputed domain names to be included together in this one case, as opposed to a series of many separately filed complaints. Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as “the Respondent”) in a single proceeding.

### **6.2. Substantive Issues**

#### **A. Identical or Confusingly Similar**

Ownership of a nationally registered trademark constitutes prima facie evidence that the complainant has the requisite rights in a mark for purposes of paragraph 4(a)(i) of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

Complainant claims registered trademark rights in the ALLSTATE Mark and unregistered trademark rights in the ALLSTATE IDENTITY PROTECTION Mark for its insurance services dating back to 1961 based on its use, advertising and accrued recognition and distinctiveness acquired since 2020. Sufficient evidence has been submitted in the form of electronic copies of valid and subsisting national and international trademark registration documents for the ALLSTATE Mark in the name of Complainant referenced in section 4. Complainant has demonstrated, therefore, that it has registered trademark rights in the ALLSTATE Mark, and based on the substantial evidence of use, advertising and industry and consumer recognition sufficient to establish acquired distinctiveness, as discussed below, the Panel finds Complainant has established unregistered trademark rights in the ALLSTATE IDENTITY PROTECTION Marks.

In support of the acquired distinctiveness obtained for its unregistered trademark rights, Complainant shows in addition to the extensive use for Complainant's services, that the services identified by the ALLSTATE IDENTITY PROTECTION Mark benefit from the strong reputation and recognition that the ALLSTATE Mark, comprising the dominant portion of the ALLSTATE IDENTITY PROTECTION Mark, has achieved through its use since at least as early as 1961. Complainant also shows that prior UDRP panels have recognized the ALLSTATE Mark as "well known in its industry" and found bad faith use because the respondent intended "to take unfair profits from the Complainant's famous ALLSTATE mark". *Allstate Insurance Company v. 杨智超 (Zhichao Yang)*, WIPO Case No. [D2024-3780](#).

Complainant submits evidence to further support secondary meaning for its ALLSTATE IDENTITY PROTECTION Marks based on trade association and market specific awards and recognition such as the ones listed below, which awards predate the registration dates of all the disputed domain names, including:

1. 2022 Identity Protection Service Scorecard (Javelin Strategy & Research);
2. 2023 Best Identity Theft Protection Service for Families (Bankrate); and
3. Printouts of Google Trends concerning the terms "Allstate Identity Protection" from 2004 to today.

Finally, each Respondent's actions in registering multiple domain names targeting Complainant's ALLSTATE IDENTITY PROTECTION Mark, and redirecting to Complainant's Official ALLSTATE IDENTITY PROTECTION Website in itself supports Complainant's claim that its ALLSTATE IDENTITY PROTECTION Marks have achieved sufficient distinctiveness and recognition in their market for insurance and risk protection services to accrue unregistered trademark rights.

All the disputed domain names encompass Complainant's ALLSTATE Mark or its ALLSTATE IDENTITY PROTECTION Mark, or the dominant elements or abbreviation of the latter, only followed or preceded by additional terms.

Prior UDRP panels have held that wholly incorporating a complainant's mark is sufficient to establish identity or confusing similarity for purposes of the Policy despite the addition of other terms to such marks. [WIPO Overview 3.0](#), section 1.8 ("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"), see also *Wal-Mart Stores, Inc. v. MacLeod d/b/a/ For Sale*, WIPO Case No. [D2000-0662](#).

Although the disputed domain names here also include a number of other terms such as the prefixes "today", "get", "partner", "try", "use", "open", "join", etc., or the suffixes "hub", "crew", "labs" or "team") together with the ALLSTATE and ALLSTATE IDENTITY PROTECTION Marks (or dominant elements of the latter), the Panel finds these terms in the disputed domain names does not prevent a finding of confusing similarity with Complainant's marks for the purposes of the Policy. See [WIPO Overview 3.0](#), section 1.8.

Complainant shows the abbreviation “AIP” is used by Complainant and third parties to refer to its “Allstate Identity Protection” service and Complainant also uses the abbreviated form in the composition of some of its corporate contact email addresses for corporate correspondence.

Prior UDRP panels have held that a domain name containing the abbreviation of a complainant’s trademark can be confusingly similar to that trademark, particularly in circumstances where the respondent is targeting the trademark in question. See, e.g., *BAWAG P.S.K. Bank für Arbeit und Wirtschaft und Österreichische Postsparkasse Aktiengesellschaft v. WhoisGuard, Inc. / Name Redacted*, WIPO Case No. [D2021-0509](#). Noting that by redirecting to the Official ALLSTATE IDENTITY PROTECTION Website, the Respondent has plainly sought to target the trademark, as explained below, the Panel finds the abbreviation “AIP” to be sufficient to render the Complainant’s ALLSTATE IDENTITY PROTECTION unregistered trademark recognizable within the relevant disputed domain names. [WIPO Overview 3.0](#), section 1.15.

The generic Top-Level Domains (“gTLDs”) included in the disputed domain names, such as (“.com” “.top” “.cfd”, “.click” and “.sbs”.) each represents a digital marker appended solely for technical compliance as a standard registration requirement and disregarded for determining confusing similarity under the first element of the Policy. See [WIPO Overview 3.0](#), section 1.11.1.

Complainant has satisfied paragraph 4(a)(i) of the Policy.

## **B. Rights or Legitimate Interests**

Under the second element of the Policy, a complainant is first required to make out a prima facie case that the respondent lacks rights or legitimate interests in the disputed domain name. If a complainant makes that showing, the burden of production on this element shifts to the respondent to come forward with relevant evidence of such rights or legitimate interests in the domain name. If the respondent fails to come forward with such evidence, a complainant is generally deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1. See also, *Malayan Banking Berhad v. Beauty, Success & Truth International*, WIPO Case No. [D2008-1393](#).

Complainant has established, prima facie, that Respondent lack rights or legitimate interests in each of the disputed domain names. First, Complainant submits that it has not licensed or otherwise authorized the Respondent to use the ALLSTATE Mark or ALLSTATE IDENTITY PROTECTION Mark in any manner or to register any of the disputed domain names, nor is Complainant in any way or manner affiliated with or otherwise connected with Respondent. There is no evidence of record that Respondent has registered as trademarks or used unregistered marks for the terms “allstate” or “allstate identity protection” or others corresponding to the disputed domain names and Complainant contends after a reasonable search, neither Respondent has registered any trademarks for ALLSTATE or ALLSTATE IDENTITY PROTECTION, nor has Complainant found any evidence to suggest either Respondent holds unregistered rights in such terms.

There is no evidence demonstrating that either Respondent is commonly known by any of the disputed domain names.

Complainant next contends that each Respondent lacks rights or legitimate interests in their respective disputed domain names because each disputed domain name is (or was in the past) either actively used to redirect to Complainant’s Official ALLSTATE IDENTITY PROTECTION Website or in a few instances is currently inactive and therefore passively held by Respondent, and such non-use under the circumstances here cannot be sustained as legitimate use.

As discussed under section 4, Complainant has shown in the evidence submitted that all of the disputed domain names originally redirected to Complainant’s Official ALLSTATE IDENTITY PROTECTION Website and some of these have since become inactive. The disputed domain names which are inactive for website purposes are considered passively held by Respondent.

Each of the disputed domain names redirected to Complainant’s Official ALLSTATE IDENTITY

PROTECTION Website, which supports a finding that the disputed domain names were chosen specifically to target Complainant and its ALLSTATE Mark, and, therefore, is not a use in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use. See, [WIPO Overview 3.0](#), section 2.5.3; See also, *Holding Benjamin et Edmond De Rothschild, Pregny Société Anonyme v. Edmond Rothschild*, WIPO Case No. [D2024-4363](#).

As for Respondent's inactive websites, their current non-use of the passively held disputed domain names also does not confer rights or legitimate interests under paragraph 4(c)(iii) in the circumstances of this case.

Moreover, as stated above, considering the composition and prior use of the disputed domain names, consisting of Complainant's ALLSTATE Mark or ALLSTATE IDENTITY PROTECTION Mark, or the dominant elements of abbreviation of the latter, the intent of Respondent to take unfair advantage of the likelihood of confusion as to the origin or affiliation of the websites via its registration of the disputed domain names cannot constitute fair use.

Complainant has presented a strong *prima facie* case indicating that Respondent does not have any rights or legitimate interests in the disputed domain names. The Panel notes that neither Respondent has submitted any Response in these proceedings, much less provided the Panel with any evidence set forth in paragraph 4(c) of the Policy from which the Panel might conclude a Respondent has rights or legitimate interests in the disputed domain names. As such, Respondent has failed to rebut Complainant's strong *prima facie* case.

The Panel finds, therefore, that Complainant has successfully met its burden and that the Complaint succeeds under paragraph 4(a)(ii) of the Policy.

### **C. Registered and Used in Bad Faith**

The Panel finds that Respondent's actions constitute bad faith registration and use of the disputed domain names.

Under this third element of the Policy, Complainant first contends that that because Respondent has created a large number of disputed domain names that are confusingly similar to Complainant's ALLSTATE Mark or ALLSTATE IDENTITY PROTECTION Mark, it is implausible to believe that Respondent was not aware of Complainant's widely known ALLSTATE Mark registered over 60 years ago and comprising the predominant portion of its more recent, but already widely recognized ALLSTATE IDENTITY PROTECTION Mark, when it registered its confusingly similar disputed domain names. This likelihood of awareness is especially true where Complainant's earliest ALLSTATE Mark registration predates the registration of all of the disputed domain names by over 60 years. Complainant has also marketed its ALLSTATE IDENTITY PROTECTION services since 2019 and has established unregistered trademark rights through acquired distinctiveness which the Panel finds predate the earliest registration date among all the disputed domain names of October 8, 2024, for <todayallstateidentityprotection.com> among others registered on the same date.

Complainant's ALLSTATE Mark is also registered all over the world, especially including the United States where Complainant was founded and where each Respondent is located, which likely influenced their selection of Complainant's Marks when registering their disputed domain names. UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names incorporating the mark plus a descriptive term) to a widely known trademark by an unaffiliated entity can by itself create a presumption of bad faith registration and use.

See [WIPO Overview 3.0](#), section 3.1.4. See also, *Allstate Insurance Company v. 杨智超 (Zhichao Yang)*, WIPO Case No. [D2024-3780](#).

Based on the foregoing and Respondent's registration of domain names which reproduce Complainant's well-known ALLSTATE Mark, as well as the ALLSTATE IDENTITY PROTECTION Mark (including in some cases the dominant elements or abbreviation of the latter) without the consent or authorization of the Complainant, registered decades after ALLSTATE Mark has been registered globally, and at a time when the ALLSTATE IDENTITY PROTECTION brand was already popular and received awards and recognition making it implausible that Respondent was unaware of them when the disputed domain names were

registered, the Panel finds that Respondent targeted Complainant through its choice of the disputed domain names and concludes that each of the disputed domain names was registered in bad faith. See *LinkedIn Corporation v. Registration Private, Domains By Proxy, LLC / Sathishkumar Varatharajan, Kudo Metrics*, WIPO Case No. [D2018-1807](#); see also *Balenciaga v. liu zhixian, zhixian liu*, WIPO Case No. [D2010-1831](#).

Bad faith use is also clear from Respondent's redirection to Complainant's Official ALLSTATE IDENTITY PROTECTION Website. Complainant further contends that Respondent's disputed domain names reproduce Complainant's well-known ALLSTATE Mark, as well as the ALLSTATE IDENTITY PROTECTION Mark (which includes the abbreviation or the dominant elements of the latter) to redirect users to Complainant's Official ALLSTATE IDENTITY PROTECTION Website, which amounts to bad faith registration and use pursuant to paragraph 4(b)(iv) of the Policy. [WIPO Overview 3.0](#), section 3.1.4 See also *BestBet Ltd v. Ranjeet Kumar, Adsetweb, LLC*, WIPO Case No. [D2024-1721](#). Given the circumstances of this case, such a showing is sufficient to establish bad faith registration and use.

Complainant also submits that the now inactive disputed domain names are nonetheless being "used" in bad faith under the principle of passive holding. See *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#); [WIPO Overview 3.0](#), section 3.3. It is the consensus view of UDRP panels that the key points in determining bad faith under the passive holding doctrine include: (i) the degree of distinctiveness or reputation of the complainant's mark, (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, (iii) the Respondent's concealing its identity or use of false contact details (noted to be in breach of its registration agreement), and (iv) the implausibility of any good faith use to which the domain name may be put. [WIPO Overview 3.0](#), *supra*.

Based on factors already explored in depth, the Panel finds the current passive holding of some disputed domain names does not prevent a finding of bad faith, considering: (1) the renown and well-recognized nature of the distinctive ALLSTATE Mark for insurance and incorporated as the portion of the ALLSTATE IDENTITY PROTECTION Mark; (2) that Respondent has not submitted any response, nor any evidence of actual or contemplated good faith use; (3) the prior redirection to the Complainant's official site.

Accordingly, the Panel finds that the disputed domain names have been both registered and used in bad faith, and that the Complainant has met its burden under paragraph 4(a)(iii) 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 names <aipcrew.com>, <aiphq.com>, <aipsite.com>, <allstateidentityapp.top>, <allstateidentity.cfd>, <allstateidentity.click>, <allstateidentitycrew.top>, <allstateidentityhq.top>, <allstateidentityhub.top>, <allstateidentitylabs.top>, <allstateidentityprotectionapp.com>, <allstateidentityprotectioncrew.com>, <allstateidentityprotectionhq.com>, <allstateidentityprotectionhub.com>, <allstateidentityprotectionsite.com>, <allstateidentityprotectionteam.com>, <allstateidentity.sbs>, <allstateidentitiesite.top>, <allstateidentity-team.top>, <allstateidentityteam.top>, <allstateidentity.top>, <get-aipapp.com>, <get-aip.com>, <getaip.com>, <getaipcrew.com>, <get-aiphq.com>, <getaiphq.com>, <get-aiphub.com>, <get-aiplabs.com>, <getaiplabs.com>, <get-aipsite.com>, <getaipsite.com>, <get-aip-team.com>, <get-aipteam.com>, <getaip-team.com>, <getaipteam.com>, <getallstateidentityapp.top>, <getallstateidentitycrew.top>, <getallstateidentityhq.top>, <getallstateidentityhub.top>, <getallstateidentitylabs.top>, <get-allstateidentityprotectioncrew.com>, <getallstateidentityprotectioncrew.com>, <getallstateidentityprotectionhq.com>, <getallstateidentityprotectionhub.com>, <get-allstateidentityprotectionlabs.com>, <getallstateidentityprotectionlabs.com>, <getallstateidentityprotectionsite.com>, <getallstateidentityprotectionteam.com>, <getallstateidentitiesite.top>, <getallstateidentity-team.top>, <getallstateidentityteam.top>, <get-allstateidentity.top>, <getallstateidentity.top>, <meetaip.com>, <meetallstateidentityprotection.com>, <meetallstateidentity.top>, <openaipapp.com>, <openaipcrew.com>, <openaiphq.com>, <openaiphub.com>, <openaiplabs.com>, <openaipsite.com>, <openaip-team.com>,

<openaipteam.com>, <openallstateidentityapp.top>, <openallstateidentitycrew.top>, <openallstateidentityhq.top>, <openallstateidentityhub.top>, <openallstateidentitylabs.top>, <openallstateidentityprotection.com>, <openallstateidentityprotectioncrew.com>, <openallstateidentityprotectionhq.com>, <openallstateidentityprotectionhub.com>, <openallstateidentityprotectionlabs.com>, <openallstateidentityprotectionsite.com>, <openallstateidentityprotection-team.com>, <openallstateidentityprotectionteam.com>, <openallstateidentitiesite.top>, <openallstateidentity-team.top>, <openallstateidentityteam.top>, <openallstateidentity.top>, <theallstateidentityprotection.com>, <theallstateidentityprotectionhub.com>, <theallstateidentityprotectionsite.com>, <theallstateidentityprotectionteam.com>, <theallstateidentity.top>, <tryaipapp.com>, <tryaip.com>, <tryaipcrew.com>, <tryaiphub.com>, <tryaiplabs.com>, <tryaipsite.com>, <tryaip-team.com>, <tryaipteam.com>, <tryallstateidentityapp.top>, <tryallstateidentitycrew.top>, <tryallstateidentityhq.top>, <tryallstateidentityhub.top>, <tryallstateidentitylabs.top>, <tryallstateidentityprotectioncrew.com>, <tryallstateidentityprotectionhq.com>, <tryallstateidentityprotectionhub.com>, <tryallstateidentityprotectionlabs.com>, <tryallstateidentityprotectionsite.com>, <tryallstateidentityprotectionteam.com>, <tryallstateidentitiesite.top>, <tryallstateidentity-team.top>, <tryallstateidentityteam.top>, <tryallstateidentity.top>, <useaip.com>, <useaipcrew.com>, <useaiphub.com>, <useaiplabs.com>, <useaipsite.com>, <useaipteam.com>, <useallstateidentityapp.top>, <useallstateidentitycrew.top>, <useallstateidentityhq.top>, <useallstateidentityhub.top>, <useallstateidentitylabs.top>, <useallstateidentityprotectioncrew.com>, <useallstateidentityprotectionhub.com>, <useallstateidentityprotectionlabs.com>, <useallstateidentityprotection-team.com>, <useallstateidentity.top>, <useallstateidentitiesite.top>, <useallstateidentityteam.top>, <useallstateidentity-team.top>, <todayallstateidentityprotection.com>, <partnerallstateidprotection.com>, <workwithallstateidprotection.com>, <helloallstateidprotection.com>, <lifallstateidprotection.com>, <thinkallstateidentityprotection.com>, <goallstateidentityprotection.com>, <tryallstateidprotection.com>, <todayallstateidprotection.com>, <getallstateidentityprotection.com>, <helloallstateidentityprotection.com>, <nowallstateidentityprotection.com>, <getallstateidprotection.com>, <tryallstateidentityprotection.com>, <risingallstateidprotection.com>, <workwithallstateidentityprotection.com>, <nowallstateidprotection.com>, <partnerallstateidentityprotection.com>, <joinallstateidentityprotection.com>, <thinkallstateidprotection.com>, <lifallstateidentityprotection.com>, <goallstateidprotection.com>, <joinallstateidprotection.com>, and <risingallstateidentityprotection.com> be transferred to Complainant.

*/Scott R. Austin/*

**Scott R. Austin**

Sole Panelist

Date: January 23, 2026