

ADMINISTRATIVE PANEL DECISION

Universal Services of America, LP d/b/a Allied Universal v. Chandler Synder,
allieduniversalhr.com

Case No. D2025-1064

1. The Parties

The Complainant is Universal Services of America, LP d/b/a Allied Universal, United States of America (“U.S.”), represented by Cozen O’Connor, U.S.

The Respondent is Chandler Synder, allieduniversalhr.com, U.S.

2. The Domain Name and Registrar

The disputed domain name <allieduniversalhr.com> (the “Disputed Domain Name”) is registered with Squarespace Domains II LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 14, 2025. On March 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On March 17, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Disputed Domain Name that differed from the named Respondent (Unknown Registrant) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 21, 2025, 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 25, 2025.

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 Respondents of the Complaint, and the proceedings commenced on March 27, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 16, 2025. The Respondent did not submit a response. Accordingly, the Center notified the Respondent’s default on April 21, 2025.

The Center appointed Douglas M. Isenberg as the sole panelist in this matter on April 28, 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

The Complainant states that it was “[e]stablished in 1957” and “is the world’s largest security services company providing proactive security services and cutting-edge technology to deliver evolving, tailored solutions”. The Complainant further states that it “operates in at least 90 countries across the globe, providing its clients the benefit of working with an \$18 billion company with a workforce of approximately 800,000 employees globally” and that it “is the third largest employer in North America and the seventh largest employer in the world”.

The Complainant further states that it has registered ALLIED UNIVERSAL as a trademark “throughout the world”, including via the following registrations, for which it has provided documentation (the “ALLIED UNIVERSAL Trademark”):

- U.S. Reg. No. 5,136,006 for ALLIED UNIVERSAL (registered February 7, 2017) for use in connection with, inter alia, “security services in the nature of security guard services”;
- U.S. Reg. No. 5,136,124 for ALLIED UNIVERSAL & Design (registered February 7, 2017) for use in connection with, inter alia, “security services in the nature of security guard services”.

The Disputed Domain Name was created on February 21, 2025, and is not used in connection with an active website.

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 identical or confusingly similar to the ALLIED UNIVERSAL Trademark because the Disputed Domain Name “incorporates the identical ALLIED UNIVERSAL elements in Complainant’s” ALLIED UNIVERSAL Trademark and “also includes the additional ‘HR’ element which is commonly known and used as the abbreviation for ‘Human Resources’”, which “fails to distinguish, and in fact, increases the likelihood of confusion, as consumers may believe the Disputed Domain is affiliated with Complainant’s human resources department”.
- The Respondent has no rights or legitimate interests in the Disputed Domain Name because, inter alia, “Respondent has anonymously registered the Disputed Domain in an effort to evade the consequences of registering a domain name for which he/she has no rights or legitimate interests”; and “Respondent in this proceeding is Chandler Synder and is not commonly known as ‘ALLIED UNIVERSAL’, there is no evidence connecting Respondent and the Disputed Domain, and Complainant has not authorized, licensed, or endorsed Respondent’s use of Complainant’s ALLIED UNIVERSAL® Marks in the Disputed Domain”.
- The Respondent registered and is using the Disputed Domain Name in bad faith because, inter alia, “[g]iven that Respondent also chose to attach the descriptor ‘HR’ at the end of Complainant’s federally registered ALLIED UNIVERSAL® Marks in the Disputed Domain name, it is likely that Respondent plans to use the Disputed Domain as a website or email extension to fraudulently obtain personal information from

individuals believing that the Disputed Domain is related to Complainant's HR department", which "could lead individuals to unwittingly participate in a fraudulent scheme and provide confidential information to Respondent, which would clearly amount to bad faith"; and "consideration of the totality of factors compared to factors that Panels have consistently held to be relevant in finding bad faith leads to a bad faith finding in this instance, including the degree of distinctiveness and reputation of the Complainant's ALLIED UNIVERSAL® Marks, Respondent's concealing its identity, and the implausibility of any good faith to which Respondent registered or would use this domain name".

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 Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 1.7.

Based on the registrations cited by the Complainant and the certificates of registration included as annexes, the Complainant has shown rights in respect of a trademark or service mark for purposes of the Policy, that is, the ALLIED UNIVERSAL Trademark. [WIPO Overview 3.0](#), section 1.2.1.

As set forth in [WIPO Overview 3.0](#), section 1.7, "in cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar to that mark for purposes of UDRP standing". Here, the entirety of the ALLIED UNIVERSAL Trademark is reproduced within the Disputed Domain Name.

Further, although the addition of other terms (here, "hr") may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the Disputed Domain Name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8. Indeed, previous panels have found that disputed domain names containing a complainant's trademark plus the letters "hr" are confusingly similar to the trademark. See, e.g., *Sanofi v. wang lao*, WIPO Case No. [D2024-4408](#) (finding <hr-sanofi.com> confusingly similar to SANOFI); *Corning Incorporated v. 黄子蔚 (huang zi wei)*, WIPO Case No. [D2023-3639](#) (finding <hr-corning.com> confusingly similar to CORNING); and *Equinor ASA v. lary ann*, WIPO Case No. [D2023-2525](#) (finding <hr-equinor.com> confusingly similar to EQUINOR).

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 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 3.0](#), 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.

Further, by failing to use the Disputed Domain Name in connection with an active website, the Respondent clearly has not used the Disputed Domain Name "in connection with a bona fide offering of goods or services" and, therefore, cannot establish rights or legitimate interests pursuant to paragraph 4(c)(i) of the Policy. As numerous panels have repeatedly said, "Passively holding a domain name does not constitute a bona fide offering of goods or services". *Philip Morris USA Inc. v. Gabriel Hall*, WIPO Case No. [D2015-1779](#). See also, e.g., *L'Oréal v. Haya Manami*, WIPO Case No. [D2015-0924](#) ("The Domain Name points to an inactive page. Consequently, Respondent is not using the Domain Name in connection with a bona fide offering of goods or services...").

As to the fact that the Registrar's identification of the Respondent includes "allieduniversalhr.com" as organization name, the Panel finds that this is irrelevant for purposes of paragraph 4(c) of the Policy. In many cases, registrants provide names that correspond to a complainant's trademark, despite having no rights to such names, often in an attempt to hide their phishing activities, as appears to be the case here. See, e.g., *Barclays Bank PLC v. "Barclays Bank"*, WIPO Case No. [D2023-0185](#) ("the use of the Complainant's name to register the disputed domain name as evidenced by the Whols, falsely suggests affiliation with the Complainant and points to an intention to confuse Internet users by leading them to think that the disputed domain name belongs to the Complainant"); *Amazon.com Inc., Amazon Technologies, Inc. and Amazon Europe Holding Technologies SCS v. "U S / Amazon.com, Inc."*, WIPO Case No. [D2013-2161](#) ("the disputed domain name in this case appears to have been registered by Respondent falsely using 'Amazon.com', Complainant's well-known trademark name as well as Complainant's location, for its identity"); and *Quest Diagnostics Investments LLC v. Quest*, WIPO Case No. [D2019-1030](#) ("Registration under the name 'Quest', which does bear some similarity to the disputed domain name, does not alone suffice to show that the Respondent is commonly known by the disputed domain name").

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. In the present case, the Panel notes that the Respondent is not using the Disputed Domain Name in connection with an active website.

Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), 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 <allieduniversalhr.com> be transferred to the Complainant.

/Douglas M. Isenberg/

Douglas M. Isenberg

Sole Panelist

Date: May 11, 2025