

## **ADMINISTRATIVE PANEL DECISION**

Universal Services of America, LP d/b/a Allied Universal v. Brian Anderson  
Case No. D2025-1546

### **1. The Parties**

The Complainant is Universal Services of America, LP d/b/a Allied Universal, United States of America, represented by Cozen O'Connor, United States of America.

The Respondent is Brian Anderson, United States of America.

### **2. The Domain Name and Registrar**

The disputed domain name <allieduniversalservice.com> is registered with NameCheap, Inc. (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 16, 2025. On April 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 17, 2025, 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 (Unknown Registrant / Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 22, 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 April 24, 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 Respondent of the Complaint, and the proceedings commenced on April 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was May 19, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on May 20, 2025.

The Center appointed Colin T. O'Brien as the sole panelist in this matter on May 30, 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

Established in 1957, the Complainant is one of the world's largest security services company. Through its global organization, the Complainant operates in at least 90 countries and had USD 18 billion in sales with a workforce of approximately 800,000 employees globally. Complainant is among the largest employers in North America and the world.

The Complainant operates under the Allied Universal name and owns United States of America federal trademark registration incorporating the Allied Universal name including the following:

Mark	Registration Number	Registration Date	International Classes
ALLIED UNIVERSAL	5,136,006	February 7, 2017	37, 41, 42, 45
 ALLIEDUNIVERSAL	5,136,124	February 7, 2017	37, 41, 42, 45
ALLIED UNIVERSAL SECURITY SERVICES	5,136,112	February 7, 2017	37, 41, 42, 45

(the "ALLIED UNIVERSAL Marks")

The Respondent registered the disputed domain name <allieduniversalservice.com> on March 13, 2025.

#### 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 incorporates the identical ALLIED UNIVERSAL elements in the Complainant's federally registered ALLIED UNIVERSAL Marks with the additional "service" element which can be commonly used in connection with a seemingly authorized email. The mere addition of the descriptive element of "service" to the Complainant's ALLIED UNIVERSAL Marks in the disputed domain name fails to distinguish, and in fact, increases the likelihood of confusion, as consumers may believe the disputed domain name is affiliated with the Complainant's business as the disputed domain name creates the impression that it is connected to job opportunities within the Complainant's business.

The Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is not affiliated with the Complainant, and there is no evidence to suggest that the Respondent has registered the disputed domain name to advance legitimate interests or for the bona fide offering of legitimate goods or services.

The Respondent is not commonly known as "allied universal", there is no evidence connecting the Respondent and the disputed domain name, and the Complainant has not authorized, licensed, or endorsed the Respondent's use of the Complainant's ALLIED UNIVERSAL Marks in the disputed domain name.

The Respondent's adoption and use of the disputed domain name is in bad faith and is in willful infringement of the Complainant's prior rights. The Respondent has attempted to take commercial advantage of the

Complainant's ALLIED UNIVERSAL Marks and commercial reputation in order to trade off the Complainant's goodwill.

The Respondent's registration and its current passive use of the disputed domain name is in bad faith. It is apparent that the Respondent registered the disputed domain name to trade off the Complainant's goodwill in the ALLIED UNIVERSAL Marks and to confuse consumers into believing that the Respondent's website is affiliated or associated with the Complainant when that is not the case. Given that the Respondent also chose to attach the descriptor "service" at the end of the Complainant's federally registered ALLIED UNIVERSAL Marks in the disputed domain name, it is likely that the Respondent plans to use the disputed domain name as a website or email extension to fraudulently obtain personal information from individuals believing that the disputed domain name is actually related to Complainant. The Respondent's use of the disputed domain name could lead individuals to unwittingly participate in a fraudulent scheme and provide confidential information.

## **B. Respondent**

The Respondent did not reply to the Complainant's contentions.

## **6. Discussion and Findings**

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

The Complainant has demonstrated it owns registered trademark rights in the ALLIED UNIVERSAL mark. The addition of the term "services" does not prevent a finding of confusing similarity. See sections 1.8 and 1.9 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions Third Edition ("[WIPO Overview 3.0](#)").

Accordingly, the disputed domain name is confusingly similar to a mark in which the Complainant has rights.

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

The Complainant has presented a *prima facie* case that the Respondent has no rights or legitimate interests in respect of the disputed domain name and has not been commonly known by the disputed domain name. The fact that the Respondent obtained the disputed domain name years after the Complainant had begun using its ALLIED UNIVERSAL mark indicates that the Respondent sought to piggyback on the mark for illegitimate reasons.

After a complainant has made a *prima facie* case, the burden of production shifts to a respondent to present evidence demonstrating rights or legitimate interests in the disputed domain name. See, e.g., *Croatia Airlines d.d. v. Modern Empire Internet Ltd.*, WIPO Case No. [D2003-0455](#).

Here, the Respondent has provided no evidence of any rights or legitimate interests in the disputed domain name. Moreover, the disputed domain name incorporates the Complainant's trademark in its entirety along with the descriptive term "services", potentially conveying to unsuspecting Internet users the false belief that any website or email connected to the disputed domain name is associated with the Complainant. Such a risk of affiliation or association with the Complainant and its mark cannot constitute fair use.

In the absence of any evidence rebutting the Complainant's *prima facie* case indicating the Respondent's lack of rights or legitimate interests in respect of the disputed domain name, the Panel finds that the Complainant has satisfied paragraph 4(a)(ii) of the Policy.

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

The disputed domain name was registered years after the Complainant first registered and used its ALLIED UNIVERSAL mark. The evidence provided by the Complainant with respect to the extent of use of its ALLIED UNIVERSAL mark combined with the absence of any evidence provided by the Respondent to the contrary, is sufficient to satisfy the Panel that, at the time the disputed domain name was registered, the Respondent undoubtedly knew of the Complainant's ALLIED UNIVERSAL mark, and knew it had no rights or legitimate interests in the disputed domain name.

Moreover, UDRP panels have consistently found that the mere registration of a domain name that is confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. See section 3.1.4 of the [WIPO Overview 3.0](#).

The Panel finds that the only plausible basis for registering and using the disputed domain name is for illegitimate and bad faith purposes. In addition, in view of section 3.3 of the [WIPO Overview 3.0](#), the current inactive state of the disputed domain name does not prevent a finding of bad faith under the doctrine of passive holding.

Accordingly, the Panel finds that the Complainant has satisfied 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 name <allieduniversalservice.com> be transferred to the Complainant.

*/Colin T. O'Brien/*

**Colin T. O'Brien**

Sole Panelist

Date: June 13, 2025