

ADMINISTRATIVE PANEL DECISION

Chubb INA Holdings Inc. v. 厦门市江辰投资管理有限公司 (xia men shi jiang chen tou zi guan liCo.,Ltd.)

Case No. D2025-2025

1. The Parties

The Complainant is Chubb INA Holdings Inc., United States of America ("United States"), represented by Fish & Richardson P.C., United States.

The Respondent is 厦门市江辰投资管理有限公司 (xia men shi jiang chen tou zi guan liCo.,Ltd.), China.

2. The Domain Name and Registrar

The disputed domain name <chubbwealth.com> is registered with Alibaba Cloud Computing Ltd. d/b/a HiChina (www.net.cn) (the "Registrar").

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the "Center") on May 22, 2025. On May 22, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 23, 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) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 23, 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 in English on May 27, 2025.

On May 23, 2025, the Center informed the Parties in Chinese and English, that the language of the Registration Agreement for the disputed domain name is Chinese. On May 27, 2025, the Complainant requested English to be the language of the proceeding.

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 in Chinese and English of the Complaint, and the proceedings commenced on May 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 19, 2025. The Response was filed in English with the Center on May 30, 2025. The Respondent further filed an amended Response in English on June 5, 2025.

On June 13, 2025, the Complainant submitted an unsolicited supplemental filing in English. On the same day, the Respondent submitted an unsolicited supplemental filing in Chinese as a response to that of the Complainant.

The Center appointed Deanna Wong Wai Man as the sole panelist in this matter on July 2, 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.

On July 11, 2025, the Complainant submitted another unsolicited supplemental filing in English. As a response, the Respondent submitted another unsolicited supplemental filing in Chinese on the same day.

4. Factual Background

The Complainant, through its predecessors in interest, has used the CHUBB mark for insurance services and related goods and services since 1882. With operations in 54 countries and territories, the Complainant provides insurance services and also provides a broad array of financial services, including wealth management, risk management, and advisory services to a diverse client base. The Complainant has a global workforce of approximately 40,000 employees. The Complainant's parent company, Chubb Limited, trades on the New York Stock Exchange (NYSE: CB) and is a component of the S&P 500 index.

The Complainant is the owner of a large portfolio of registered trademarks for the CHUBB mark, including but not limited to the following: United States trademark registration No. 1729813 for CHUBB, registered on November 3, 1992; United States trademark registration No. 5648457 for CHUBB, registered on January 8, 2019; United States trademark registration No. 5586289 for CHUBB, registered on October 16, 2018; and also Chinese trademark registration No. 771140 for CHUBB, registered since November 7, 1994 in Class 36 for, among other things, financial services. Furthermore, the Complainant is the owner of a number of domain name registrations containing its CHUBB trademark, such as <chubb.com>, registered on September 7, 1995 (used for the Complainant's main website) and <chubbinsurance.com> registered on April 21, 1999.

The disputed domain name was registered on October 11, 2021, and it resolves to a parking page where it is offered for sale.

The Respondent is a company established in China and allegedly provides investment management services.

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, in its Complaint, the Complainant contends that the Respondent registered the disputed domain name which is confusingly similar to the Complainant's CHUBB trademark. Specifically, the Complainant states the disputed domain name is identical to the Complainant's trademark, except for (1) the addition of the descriptive and commonly used term "wealth" and (2) the addition of the generic Top-Level Domain

(gTLD) “.com”. The Complainant also adds that the Respondent lacks rights or legitimate interests in the disputed domain name under paragraph 4(c) of the Policy because (i) the Respondent is not commonly known by the disputed domain name, and (ii) the Respondent’s use of the disputed domain name does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use. The Complainant also contends that the Respondent acted in bad faith by registering or acquiring the disputed domain name primarily for the purpose of selling, renting, or otherwise transferring the disputed domain name to the Complainant—as the owner of the CHUBB trademark—or a competitor of the Complainant, for valuable consideration in excess of the out-of-pocket costs directly related to the disputed domain name. The Complainant adds that the surrounding circumstances make clear that the Respondent registered the disputed domain name in bad faith with the intent to profit by selling it to the Complainant for a substantial sum, where the Complainant refers to evidence from domain name resale platform SnapNames where the disputed domain name is allegedly listed for sale for USD 209,920. The Complainant also argues that there is no reasonable explanation for the Respondent’s registration of the disputed domain name other than to target the CHUBB marks, since the Respondent’s registration of the disputed domain name combines the Complainant’s famous trademark with a term referencing Chubb’s financial services, which can only be seen as a deliberate attempt to profit off the goodwill associated with the CHUBB brand. The Complainant argues that in these circumstances, the Respondent has no rights or legitimate interests in the disputed domain name, and the disputed domain name was registered and is used in bad faith.

Furthermore, in its unsolicited supplemental filing, the Complainant adds that the mark CHUBB is not a generic term, as the Complainant owns a vast portfolio of trademark registrations for CHUBB in jurisdictions around the world. Additionally, the Complainant argues that the Respondent’s reliance in the Response on a single third party’s use of “Chubbsafes” in the safe and vault industry is entirely irrelevant, particularly considering that the Complainant has maintained a longstanding coexistence agreement with that party based on the non-competitive nature of their respective industries. The Complainant argues that CHUBB functions exclusively as an identifier for the Complainant’s insurance and financial services, as evidenced by the representative trademark registrations submitted with the Complaint. As such, the Complainant contends that the Respondent has not rebutted the presumption that the CHUBB trademark is inherently distinctive. Moreover, the Complainant adds that the Respondent’s contention that the Complainant must show trademark recognition specifically in the wealth management sector in mainland China is incorrect. The Complainant also argues that the Respondent lacks rights or legitimate interests, as it falsely claims that “chubbwealth” is the “intended English abbreviation” of its Chinese company name, “厦门市江辰投资管理有限公司”, while that company name bears no resemblance to the mark CHUBB. Further, the Complainant states that the Respondent owns 81 domain names under its company name and/or email address and that an additional 103 domain names have been registered with a business registry number connected to the Respondent. The Complainant adds that none of these 184 domain names include “chubb” or “chubbwealth”, which the Complainant contends further evidences that the Respondent does not go by the name of “Chubb Wealth”. The Complainant also states that the disputed domain name resolves to a notice that the disputed domain name is for sale, which confirms that the Respondent has not used the disputed domain name for any bona fide offering of goods or services and has no rights or legitimate interests. The Complainant contends that the Respondent’s accusation of Reverse Domain Name Hijacking (“RDNH”) is also without basis, as the Complainant filed the Complaint in good faith to protect its longstanding and globally recognized trademark rights and the record does not support any inference of bad faith on the Complainant’s part. Additionally, the Complainant argues that a reverse Whois search reveals that the Respondent has registered over a hundred domain names many of which mimic the names of well-known financial institutions or payment platforms such as KK News, Ubisoft, Rapid AI, and Engoo, which is consistent with a pattern of abusive domain name registrations and is evidence of bad faith use and registration of the disputed domain name.

B. Respondent

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name.

Notably, in its Response, the Respondent argues that “Chubb” is a common English surname and has been used by several companies for nearly two centuries, that the Complainant’s trademarks do not cover all 45

classes of goods and services, and that the addition of the term “wealth” distinguishes the disputed domain name from the Complainant’s core services. The Respondent also argues that the disputed domain name is targeting exclusively mainland Chinese users while the Complainant’s wealth management services are offered exclusively to Hong Kong, China residents within Greater China and there is no evidence of any recognition of the CHUBB trademark in mainland China’s wealth management sector.

The Respondent argues that it has legitimate interests in “chubbwealth” as the intended English abbreviation of its Chinese company name, particularly as the English abbreviation of the name “江辰投资管理”, whereby the first two characters, “jiang chen” in pinyin Latin transliteration allegedly phonetically approximate “chubb”, and the last four characters “tou zi guan li” correspond to investment management, and that the Respondent plans to use “chubbwealth” as its English name abbreviation and that the Whois information not showing “Chubb” does not negate the Respondent’s legitimate interests.

As to absence of bad faith, the Respondent argues that the price of USD 209,920 appears on SnapNames, which is unrelated to the Respondent and the Respondent alleges that it has never listed the disputed domain name at this price. The Respondent also argues that the mere offer for sale does not constitute bad faith under UDRP jurisprudence. The Respondent adds that the disputed domain name registration (October 11, 2021) precedes the Complainant’s registration of the similar domain <chubbinvestment.com> (January 8, 2025), undermining claims of targeting of the Complainant’s business.

Finally, the Respondent claims that the Complaint constitutes Reverse Domain Name Hijacking because: the Complainant ignored the generic nature of “chubbwealth”, the Complainant failed to acknowledge legitimate third-party uses of “Chubb”, the Complainant misrepresented the domain name sale listing as attributable to the Respondent, the Complainant attempted to appropriate a dictionary-word domain name registered years before its own similar registration, and the Complainant insists on English proceedings despite knowing the Registration Agreement is in Chinese.

In its unsolicited supplemental filing, the Respondent added that, essentially, “chubb” is a common English surname and that CHUBB, as the identifier of the Complainant’s insurance and financial services, has no significant reputation in mainland China. The Respondent argues that the Complainant’s CHUBB mark is only a financial service trademark and not a wealth management trademark of the Complainant and is even less well-known in mainland China. The Respondent added that the disputed domain name was registered by the Respondent for its English abbreviation and was planned to be used as its official website domain name. The Respondent states that it does not engage in the insurance business.

Further the Respondent adds that because its company’s corresponding English name is relatively long, it is a common practice to use the English abbreviation and that in Chinese, the pronunciation of “辰” (“chen” in pinyin Latin letter transliteration) is similar to the English word “chubb”, and “投资管理” can be represented by the English word “wealth”. Therefore, it was decided to use “chubbwealth” as the Respondent’s English abbreviation and register the disputed domain name for use as its official website domain name. The Respondent also specifically argues that the Complainant itself also uses a similar structure of “generic term + industry name” as its Chinese company name. The Respondent also argues that the cases cited by the Respondent are completely appropriate and more similar to this case than the cases cited by the Complainant and are more valuable for reference. The Respondent highlights that according to paragraph 4(a)(ii) of the Rules [sic], the burden of proof is ultimately and primarily on the Complainant.

The Respondent argues that in this case, the Complainant did not provide evidence that the Respondent lacked rights or legitimate interests. As to the finding of RDNH, the Respondent argues that the law firm entrusted by the Complainant is a law firm specializing in domain name dispute resolution and the Complainant obviously wants to attribute the sale price of the disputed domain name on the SnapNames website to the Respondent, and its purpose is to prove the Respondent’s malicious sales behavior with the so-called high price. The Respondent believes that this was done with the malicious intention of framing it to ensure it to win the case.

Further, the Respondent argues that the Complainant slandered the Respondent for registering many domain names to imitate the names of well-known financial institutions or payment platforms, such as: KK

News, Ubisoft, Rapid AI, Engoo. In response to this, the Respondent raises that it is an investment management company and that the act of registering multiple domain names does not mean that it is abusing them and that the core components of the highlighted domain names, namely “kk”, “ubi”, “rapid”, are all common words or common letter combinations, and that there is no imitation of well-known financial institutions or payment platforms. The Respondent also adds that the Complainant allegedly has business in 54 countries and regions around the world, but the Respondent can find out through a simple search that there are several domain names which are exactly the same as the CHUBB trademark, are not registered under the Complainant’s name, which means that many domain names containing “chubb” can be legally used by other entities around the world. The Respondent states that combined with the Complainant’s previous many domain name complaint cases related to CHUBB, the Respondent has every reason to believe that the Complainant is trying to appropriate a domain name containing a generic term that existed before the Complainant had any rights in it.

6. Discussion and Findings

6.1 First Preliminary Issue: Language of the Proceeding

The language of the Registration Agreement for the disputed domain name is Chinese. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint, the amended Complaint, and the unsolicited supplemental filing by the Complainant were filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including the fact that (i) the disputed domain name consists entirely of English-language words, including the Complainant’s mark, (ii) there is no foreign-language equivalent of the domain name or of the “.com” gTLD, (iii) the Respondent has demonstrated familiarity with English through its registration and use of the disputed domain name, and (iv) requiring the Complainant to translate the Complaint would result in unnecessary delay or cost. In its unsolicited supplemental filing, the Complainant adds that the Respondent’s request for the proceedings to be conducted in Chinese is not credible as the Respondent submitted its Response in English and has communicated exclusively in English with the Center up until the Respondent’s filing of its unsolicited filing, which was written in Chinese.

The Respondent requested that the language of the proceeding be Chinese, essentially claiming that the Registration Agreement is in Chinese and that the Respondent is a Chinese company with limited proficiency in English, and that requiring Chinese would not cause an undue burden, while forcing English would severely prejudice the Respondent’s procedural rights.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties’ ability to understand and use the proposed language, time and costs (see WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ([“WIPO Overview 3.0”](#)), section 4.5.1).

Having considered all the matters above, and attaching particular importance to the fact that the website currently linked to the disputed domain name contains text in English and that the Respondent submitted its Response and amended Response in English and has communicated exclusively in English with the Center up until its filing of its unsolicited filing, on this basis, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

6.2 Second Preliminary Issue: Acceptance of both Parties’ Unsolicited Supplemental Filings

On June 13, 2025, the Complainant submitted an unsolicited supplemental filing in English. On the same day, the Respondent submitted an unsolicited supplemental filing in Chinese as a response to that of the Complainant. The Panel notes that the Rules do not expressly provide for supplemental filings by either

Party, apart from the Complaint and the Response, unless requested by the Panel in accordance with paragraph 12 of the Rules.

Under paragraph 10 of the Rules, the Panel is afforded broad discretion to conduct the administrative proceeding in such manner as it considers appropriate, provided that the Parties are treated with equality and that the administrative proceeding takes place with due expedition. [WIPO Overview 3.0](#), section 4.6 further states that “[u]nsolicited supplemental filings are generally discouraged, unless specifically requested by the panel”.

In this case, the Panel has reviewed the content of both Parties’ unsolicited supplemental filings of June 13, 2025, and finds that they, respectively, address certain factual allegations and evidence raised for the first time in the Response and the Complainant’s unsolicited supplemental filing. Specifically, the Complainant seeks to rebut factual claims including those about whether or not the Complainant’s trademark is a generic term, about the claims that the Respondent’s choice of the disputed domain name corresponds with its abbreviated English company name and the Respondent’s claims regarding RDNH, that could not reasonably have been anticipated or responded to in the original Complaint. Further, the Respondent’s unsolicited filing sought to respond to the further claims brought by the Complainant in its unsolicited supplemental filing, and was written in Chinese, which the Respondent claims to be essential to respect its procedural rights.

The Panel is mindful of the need to ensure procedural efficiency and to avoid unnecessary delays; however, it is also tasked with ensuring that both Parties have a fair opportunity to present their respective cases. In the Panel’s view, while both Parties’ unsolicited supplemental submissions were particularly lengthy and the submission of unsolicited supplemental filings is generally not recommended, the above-mentioned filings did provide relevant clarifications and factual rebuttal materials that may assist the Panel in reaching a fully informed decision on the merits of the case. Accordingly, exercising its discretion under the Rules, the Panel accepts both Parties unsolicited supplemental filings of June 13, 2025, and will give them due consideration in rendering this Decision. Additionally, the Panel, which is familiar with both English and Chinese, also accepts the Respondent’s unsolicited supplemental filing in Chinese and does not require a translation thereof into the language of the proceeding.

The Panel has noted that on July 11, 2025, further unsolicited supplemental filings were again made by both Parties. For procedural efficiency, the Panel has decided not to accept both sets of unsolicited supplemental filings this late in the proceedings, and in any event, the Panel’s determination not accepting the supplemental filings dated July 11, 2025 would not impact the outcome of the Decision, as those supplemental filings lack relevance to the merits of the case.

6.3 Substantive Issues

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 3.0](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the Complainant’s CHUBB mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms here, “wealth”, 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.

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, whilst the Respondent has tried to make submissions in this respect, the Panel finds that there has not been sufficient evidence to dispel the Complainant’s prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name.

In particular, in the Response, the Respondent essentially argued (i) that “Chubb” is a common English surname and has been used by several companies for nearly two centuries, (ii) that the Complainant’s trademarks do not cover all 45 classes of goods and services, (iii) that the disputed domain name is targeting exclusively mainland Chinese users while the Complainant’s wealth management services are offered exclusively to Hong Kong, China residents and there is no evidence of any recognition of the CHUBB trademark in mainland China’s wealth management sector, (iv) that the addition of the term “wealth” distinguishes the disputed domain name from the Complainant’s core services, and (v) that the Respondent has legitimate interests in “chubbwealth” as the intended English abbreviation of its Chinese company name, particularly as the English abbreviation of part of its Chinese company name, namely “江辰投资管理” (which may be translated as “Jiang Chen Investment Management”).

Mere arguments that a domain name corresponds to a term which is used by various third parties may not be sufficient to establish rights or legitimate interests for the respondent, and panels will consider the overall facts and circumstances of the case when assessing such arguments. Panels will assess whether the respondent registered and used the disputed domain name to trade off the complainant’s trademark. See *Intel Corporation v. Mira Holdings, Inc. and Domain Admin*, WIPO Case No. [D2024-4776](#). In assessing the second element of the Policy, the Panel finds that the Respondent has not demonstrated rights or legitimate interests in respect of the disputed domain name. In particular, the Respondent’s contention that “Chubb” is a common English surname and historically used by various companies does not, in itself, confer any rights or legitimate interests, absent evidence that the Respondent is commonly known by the disputed domain name or is making bona fide use of it, which the Respondent fails to provide.

Additionally, according to the Respondent’s own statements, it allegedly plans to use it as an abbreviated company name or mark indicating origin of the wealth management services it alleges to offer, which, the Panel notes, compete with the Complainant’s services. The Respondent contends that “Chubb” phonetically approximates “江辰” (in Chinese Pinyin: Jiang Chen). However, the Panel considers that the Respondent’s name does not resemble the term “Chubb”.

Further, the mere existence of a surname does not override the Complainant’s established well-known trademark rights in the insurance and financial services sector, including in the Respondent’s jurisdiction of China, where the Complainant has registered and valid trade mark rights which are deemed prima facie valid and distinctive by panels applying the Policy (see the abovementioned the Complainant’s registration of CHUBB mark in China for financial services).

As to the argument that the Complainant's trademarks do not cover all 45 classes under the Nice Classification, the Panel notes that this is not a requirement under the Policy. It is the established view of panels applying the Policy that the relevant criteria are instead absence of rights or legitimate interests by the Respondent and whether the disputed domain name is used (or intended to be used) in a manner that targets or otherwise constitutes bad faith registration and use of the Complainant's trademark rights and full class coverage is not a requirement under the Policy.

Additionally, as to the Respondent's assertion that the disputed domain name targets only mainland Chinese users, where the Complainant allegedly lacks market presence, this also does not then establish the Respondent's own rights or legitimate interests in the disputed domain name.

Firstly, the premise of this reasoning is factually incorrect since the Panel notes the Complainant has provided evidence that the Complainant in fact does own registered trademarks for CHUBB in China. Secondly, the Policy manifestly does not require proof of registered rights in every jurisdiction, and the Respondent's use of the Complainant's well-known mark in the disputed domain name in the financial sector in conjunction with the term "wealth" suggests targeting, regardless of geographic qualifiers.

Furthermore, the addition of the term "wealth" in the disputed domain name does not dispel confusion and does not create a domain name in which the Respondent can have legitimate interests, particularly as it aligns with the financial services offered by the Complainant, thereby reinforcing rather than distinguishing the association with the Complainant's prior well-known CHUBB marks. In this regard, the Panel finds that the nature of the disputed domain name, being confusingly similar to the Complainant's well-known trademarks and consisting only of the Complainant's trademark combined with the descriptive word "wealth", carries a risk of implied affiliation and cannot constitute fair use, as it effectively impersonates the Complainant and refers to its wealth management services or suggests sponsorship or endorsement by the Complainant (see [WIPO Overview 3.0](#), section 2.5.1).

Furthermore, the Respondent's alleged intent to use "chubbwealth" as an intended English abbreviation of its Chinese abbreviated company name "江辰投资管理" lacks any evidentiary support and explanation. The Chinese term "江辰投资管理" can have English or Latin reference in many other ways than as "chubbwealth". There has not been a credible reason submitted to select this translation into English which fully incorporates the Complainant's well-known trademark and the word "wealth" which is indicative of the Complainant's services. Therefore, the Panel finds the Respondent's explanation is more likely than not a pretext for its cybersquatting behavior.

Finally, the Complainant has not provided evidence demonstrating that the Respondent was commonly known as, or was using, or has made any demonstrable preparations to use "chubbwealth" in a manner consistent with a bona fide offering of goods or services or a legitimate noncommercial or fair use purpose prior to notice of the present dispute. Further, whilst offering a domain name for sale by itself may be legitimate in certain circumstances, in the current case, the Respondent has instead claimed that it intended to use the disputed domain name for bona fide business purposes though not substantiated (see also *Alloy Rods Global, Inc. v. Nancy Williams*, WIPO Case No. [D2000-1392](#) where the panel stated "the offering for sale of the disputed domain name is simply inconsistent with the Respondent's claim that she intended to use it to develop a business-to-business directory, and undercuts her claim to a legitimate interest in the name").

The Panel therefore finds that the above elements undermine the credibility of the Respondent's arguments and does not dispel from the Complainant's case that the Respondent lacks rights or legitimate interests in the disputed domain name under paragraph 4(a)(ii) of the Policy.

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 firstly accepts that the Complainant's CHUBB marks are well-known, as has been recognized earlier by multiple panels applying the Policy, see for instance: *Chubb INA Holdings Inc. v. 钱梦聘 (Meng Dan Qian)*, WIPO Case No. [D2021-0759](#). The Panel notes that registration of the disputed domain name, which is confusingly similar to the Complainant's well-known and intensively used trademarks, some of which have been registered decades before the registration date of the disputed domain name, by the Respondent, who is entirely unaffiliated with the Complainant, creates by itself a presumption of bad faith of the Respondent (see in this regard *Alain Afflelou Franchiseur v. Lihongbo, Lihongbo*, WIPO Case No. [D2020-2075](#), and [WIPO Overview 3.0](#), section 3.1.4). The Panel also notes that even a cursory Internet search or trademark search at the time of the registration of the disputed domain name would have made it clear to the Respondent that the Complainant owns prior rights in its trademarks for CHUBB, and that the Complainant is well known in the finance sector. The disputed domain name is inherently misleading, since the additional term "wealth" clearly refers to the Complainant's financial services. Based on the available record, the Panel accepts that the Respondent knew or should have known the Complainant, and has registered the disputed 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 3.0](#), section 3.2.1.

As to use of the disputed domain name in bad faith, the evidence of use of the website linked to the disputed domain name demonstrates that the Respondent is attempting to sell the disputed domain name to the general public (since it mentions in both Chinese and English "您正在访问的域名可以转让出售! the domain is for sale!" and displays contact information for Internet users to submit bids for the disputed domain name). The Panel concludes, on the balance of probabilities, that the Respondent is using the disputed domain name, which fully incorporates the Complainant's well-known CHUBB trademark in combination with the term "wealth"—a term closely associated with the Complainant's core financial services—for the primary purpose of selling it, either to the Complainant, the owner of the corresponding mark, or to a competitor of the Complainant, with the intention of deriving an undue financial benefit, which is direct evidence of bad faith under paragraph 4(b)(i) of the Policy. This conclusion stands regardless of whether the Respondent itself was directly responsible for the specific offer to sell the disputed domain name for USD 209,920 on the SnapNames platform. The Panel also notes that in this regard, the Respondent has not provided any explanation or evidence to rebut this allegation, such as a request to remove the listing or a documented denial of involvement, which it could reasonably have provided in its Response or lengthy unsolicited supplemental filing. Therefore, given the nature of the disputed domain name and the factual circumstances of the case, the Panel finds the Respondent's conduct falls squarely within the scope of paragraph 4(b)(i) of the Policy as evidence of bad faith registration and use.

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

D. Reverse Domain Name Hijacking

Panels have consistently held that a finding of Reverse Domain Name Hijacking is not warranted where the Complainant succeeds in demonstrating the required elements of the Policy. The mere fact that RDNH is alleged by the Respondent does not require detailed examination where the Complaint is upheld on the merits.

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 <chubbwealth.com> be transferred to the Complainant.

/Deanna Wong Wai Man/

Deanna Wong Wai Man

Sole Panelist

Date: July 16, 2025