

## ADMINISTRATIVE PANEL DECISION

Insured Aircraft Title Service, LLC v. Name Redacted  
Case No. D2025-2537

### 1. The Parties

The Complainant is Insured Aircraft Title Service, LLC, United States of America (“United States”), represented by Crowe & Dunlevy, P.C., United States.

The Respondent is Name Redacted.<sup>1</sup>

### 2. The Domain Name and Registrar

The disputed domain name <insuredaircrafts.net> is registered with GoDaddy.com, LLC (the “Registrar”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 28, 2025. On June 30, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name and another domain name. On July 1, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name and another 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 July 10, 2025, informing the Complainant that another disputed domain name has been repossessed by the Registrar. The proceedings were suspended on August 13, 2025, and partially settled on September 4, 2025. Following the partial settlement, the proceedings in relation to the disputed domain name were reinstituted on September 24, 2025. On the same day, the Center sent an email communication to the Complainant, 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 October 7, 2025.

---

<sup>1</sup>The record indicates that the name and contact details used for this registration belong to a third party who appears to have been listed without that person’s knowledge or authorization. Considering this potential identity theft, the Panel directs that the Respondent’s name be omitted from the published version of this Decision. An annex containing instructions to the Registrar, including the registrant data needed to implement this Decision, is authorized for transmission to the Registrar only and shall not be published, having regard to the exceptional circumstances of this case. See, e.g., *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

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 October 15, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 4, 2025. The Respondent sent email communications to the Center on October 5 and 6, 2025, stating that the disputed domain name was registered using stolen credentials. The Center informed the Parties of commencement of panel appointment process on November 5, 2025.

The Center appointed William F. Hamilton as the sole panelist in this matter on November 10, 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 November 10, 2025, in response to the notification of Panel Appointment, the Respondent sent another communication to the Center stating: “All this email are totally unnecessary...delete the domain and stop contact me, If you want discuss, kindly meet me in india..bye”.

#### **4. Factual Background**

Since 1963, the Complainant has provided worldwide escrow services and title and document recordation services to the aviation industry. The Complainant is one of the world’s largest aircraft title and escrow companies.

The Complainant holds the following trademark registrations granted by the United States Patent and Trademark Office:

- INSURED AIRCRAFT TITLE SERVICE (disclaiming “AIRCRAFT TITLE SERVICE”); Reg. No. 7,296,869 registered February 6, 2024; and
- I A T S INSURED AIRCRAFT TITLE SERVICE, INC. (and Design) (disclaiming “INSURED AIRCRAFT TITLE SERVICE, INC.”); Reg. No. 4,086,419 registered January 17, 2012.

Complainant’s primary corporate website is hosted at the domain name <insuredaircraft.com>.

The disputed domain name was registered on February 14, 2025, and it does not resolve to an active website. The disputed domain name, however, has been utilized in fraudulent emails offering “gifts” and attempting to deceive the recipients into providing personally identifiable information.

#### **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 asserts that the disputed domain name is an example of typosquatting and is intentionally confusingly similar to the Complainant’s federally registered trademark. The Complainant has not authorized, licensed, or permitted the Respondent to register or use the disputed domain name and the disputed domain name has been deployed as part of a fraudulent impersonation scheme.

## **B. Respondent**

The Respondent did not formally reply to the Complainant's contentions but sent email communications on October 5 and 6, 2025, stating that the disputed domain name was registered with false and unauthorized information. On November 10, 2025, the Respondent sent a communication that read in its entirety: "All this email are totally unnecessary...delete the domain and stop contact me, If you want discuss, kindly meet me in india..bye".

## **6. Discussion and Findings**

Paragraph 4(a) of the Policy lists three elements that a complainant must satisfy to succeed. The Complainant must demonstrate that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

### **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.

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 Panel notes that the Complainant's INSURED AIRCRAFT TITLE SERVICE and I A T S INSURED AIRCRAFT TITLE SERVICE, INC. trademarks incorporate some disclaimed terms. In this instance, the disputed domain name incorporates the term "insured" which is not a disclaimed term in INSURED AIRCRAFT TITLE SERVICE along with the term "aircraft" (which is disclaimed in the abovementioned trademarks, albeit pluralized). In addition, the Panel notes that both trademarks include the terms "insured" and "aircraft" together, although in the case of I A T S INSURED AIRCRAFT TITLE SERVICE, INC. (with Design) these terms are disclaimed.

The Panel finds that two of the common and dominant elements of the trademarks are reproduced at the disputed domain name making the trademarks recognizable in the disputed domain name. Under the Policy, the Panel notes that in certain cases the confusing similarity is affirmed by the fact that the Respondent targeted the Complainant and its trademarks. [WIPO Overview 3.0](#), section 1.7.

Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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.

Panels have held that the use of a domain name for fraud and deception to illicitly obtain personally identifiable information through schemes such as promising gifts can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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

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

The Panel notes that, for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith:

“(i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or

(ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant’s mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location.”

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.

In the present case, the Panel notes that the Respondent has used the disputed domain name as part of a fraudulent scheme to induce email recipients to provide personally identifiable information by promising “gifts.” Panels have held that the use of a domain name for fraudulent activities constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain name constitutes 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 <insuredaircrafts.net> be transferred to the Complainant.

*/William F. Hamilton/*

**William F. Hamilton**

Sole Panelist

Date: November 24, 2025