

ADMINISTRATIVE PANEL DECISION

JPMorgan Chase Bank, N.A. v. John, Ritu Client, Rabota Dub
Case No. D2025-2696

1. The Parties

The Complainant is JPMorgan Chase Bank, N.A., United States of America, represented by Greenberg Traurig, LLP, United States of America.

The Respondents are John, Ritu Client and Rabota Dub, India (referred below as “the Respondent”).

2. The Domain Names and Registrar

The disputed domain names <jpmconference.org>, <jpmhealthcareconference.org> and <jpmtechmediaconference.com> are 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 July 8, 2025. On July 9, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 10, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (REDACTED FOR PRIVACY) and contact information in the Complaint.

The Center sent an email communication to the Complainant on July 11, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on July 15, 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 July 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 7, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 8, 2025.

The Center appointed Johan Sjöbeck as the sole panelist in this matter on August 15, 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 has submitted evidence that it is the owner of a large number of trademark registrations for J.P. MORGAN, JPMORGAN, and JPMORGAN CHASE, including the following trademark registrations for JPM:

JPM (word), Norwegian trademark with registration number 198913, registered on August 18, 1999.

JPM (word), Swiss trademark with registration number P-464538, registered on September 1, 1999.

JPM (word), United Kingdom trademark with registration number UK00901103209, registered on April 13, 2000.

JPM (word), German trademark with registration number 30414966, registered on May 25, 2004.

JPM (fig), Danish trademark with registration number VR202500225, registered on March 2, 2025.

The Respondent registered the disputed domain names <jpmhealthcareconference.org> on October 22, 2021, <jpmtechmediaconference.com> on November 5, 2024 and <jpmconference.org> on March 8, 2024. The disputed domain names resolve to websites that impersonate the Complainant's official website.

5. Parties' Contentions

A. Complainant

The Complainant requests consolidation of the three disputed domain names in this proceeding because the evidence demonstrates that the disputed domain names are subject to common control. First, all of the disputed domain names were registered using the same Registrar and list the registrant as being located in Delhi, India. Additionally, all of the disputed domain names resolve to similar imposter websites purporting to be the official websites for the Complainant's conferences. Furthermore, the disputed domain names <jpmhealthcareconference.org> and <jpmconference.org> resolve to the same website. Moreover, all of the disputed domain names include the JPM trademark and descriptive terms such as "healthcare," "tech media," and "conference". Additionally, the disputed domain names <jpmhealthcareconference.org> and <jpmtechmediaconference.com> were registered using the same registrant email address and the disputed domain names <jpmhealthcareconference.org> and <jpmconference.org> were registered using the same registrant physical address.

The Complainant is an American multinational finance corporation headquartered in New York City. Through its predecessors, the Complainant has existed for over 225 years and is the largest bank in the United States, and the world's largest bank by market capitalization as of 2024. With over USD4 trillion in total assets, as of 2024, the Complainant operates the largest investment bank in the world by revenue, and serves millions of customers, clients and communities in over 100 global markets with more than 300,000

employees worldwide. The Complainant is also listed on the New York Stock Exchange under the stock symbol "JPM".

One of the Complainant's many public offerings is the J.P. Morgan Healthcare Conference, known colloquially as the "JPM Healthcare Conference." The Complainant has conducted the conference annually since 1982. The JPM Healthcare Conference features presentations from more than 500 private and public companies, focusing on hospital mergers and acquisitions, artificial intelligence, biotechnology, and insurers' financial performance.

The Complainant owns and operates the domain name <jpmorgan.com>, which it registered on April 24, 1992, where the Complainant's primary official website is hosted. The Complainant also uses the domain name <jpmorgan.com> for all of its official email addresses. The Complainant's website features designated pages for the JPM Healthcare Conference and the JPM Tech Conference.

In addition to its strong common law rights, the Complainant owns multiple trademark registrations for the trademarks J.P. MORGAN, JPMORGAN, and JPMORGAN CHASE in India. Priority for the oldest of the Complainant's trademarks registered in India dates back to 2005, sixteen years prior to Respondent's registration of <jpmhealthcareconference.org> and nearly two decades prior to Respondent's registration of <jpmtechmediaconference.com> and <jpmconference.org>. In addition to the India rights above, the Complainant has also obtained registrations for the JPM trademarks in over 100 countries. For example, the trademark JPM is registered in Denmark, Germany, Norway, Switzerland and the United Kingdom. Previous UDRP panels have recognized that Complainant's trademarks are well-known worldwide. See *JPMorgan Chase & Co. v. The Shashamane Ethiopia Federal Agents Association*, WIPO Case No. [D2015-0738](#) and *JPMorgan Chase & Co. v. Byeong Deog Im*, WIPO Case No. [D2005-0543](#).

The disputed domain names <jpmhealthcareconference.org>, <jpmtechmediaconference.com>, and <jpmconference.org> incorporate the Complainant's trademark JPM in full, and the dominant JP component of the JP MORGAN and J.P. MORGAN trademarks changing the mark only by adding the terms "healthcare," "tech media," and/or "conference", and then the generic Top-Level Domains ("gTLDs") ".org" and ".com". The addition of the terms to the Complainant's well-known JPM trademarks does not distinguish the disputed domain names, but instead actually increases the likelihood of confusion based on the direct association of those words with the Complainant's JPM Healthcare Conference and the TMC Conference. In light of the foregoing, the disputed domain names that the Respondent registered and is using, are confusingly similar to the Complainant's trademarks.

Long after the Complainant established rights in its well-known JPM trademarks, without the Complainant's authorization or consent, the Respondent registered the disputed domain names, which misappropriate and are confusingly similar to the JPM trademarks. The Respondent is not commonly known by the disputed domain names, has not used or prepared to use the disputed domain names in connection with a bona fide offering of goods or services, and has not been authorized, licensed, or otherwise permitted by the Complainant to register and/or use the disputed domain names, and registered the disputed domain names for the purpose of perpetrating a fraud on the public. As such, the Respondent clearly lacks rights to and legitimate interests in the disputed domain names. The Respondent has never operated any bona fide or legitimate business under the disputed domain names and is not making a protected non-commercial or fair use of the disputed domain names. Instead, the Respondent is using the disputed domain names to divert Internet traffic to websites that impersonate the Complainant's website. The Respondent is using the disputed domain names <jpmhealthcareconference.org> and <jpmconference.org> to host websites purporting to be the Complainant's websites for the JPM Healthcare Conference. The Respondent's websites display the Complainant's JPM trademarks and purport to provide general information about the JPM Healthcare Conference, including the actual dates and location for the real 2026 JPM Healthcare Conference. Moreover, the Respondent's websites purport to provide hotel booking services and encourage website visitors to provide personal and financial information to Respondent.

It is clear the Respondent's websites are impersonating the Complainant in an attempt to defraud individuals who are interested in attending the JPM Healthcare Conference. At worst, Imposter JPM Healthcare Conference Websites are used to engage in fraudulent transactions with consumers and steal personal information and at best, simply confuses consumers. Either way, the Respondent's use of the disputed domain names <jpmhealthcareconference.org> and <jpmconference.org> can hardly be called fair or legitimate.

The Respondent is making similar illegitimate use of the disputed domain name <jpmtechmediaconference.com> which also resolves to a website purporting to be the official website for the JPM Tech Conference. Similar to above, the Respondent's website displays the Complainant's JPM trademark and purports to provide general information about the JPM Tech Conference, including legitimate details such as the dates and location for the Conference. Moreover, the Respondent's website also purports to provide hotel booking services and encourage website visitors to provide personal and financial information.

The Whois information identified the registrant of the disputed domain names as "John," "Ritu Client," and "Rabota Dub" indicating that the Respondent is not commonly known by the disputed domain names and thus lacks rights and legitimate interests.

Moreover, the Respondent, without the Complainant's authorization or consent, registered the disputed domain names, which incorporate the Complainant's JPM trademark in full, and are thus confusingly similar to the Complainant's JPM trademarks. The Respondent has never operated any bona fide or legitimate business under the disputed domain names, and the Respondent's use of the disputed domain names does not constitute a legitimate non-commercial or fair use of the domain names. Instead, the Respondent is using the disputed domain names to impersonate the Complainant. Either way, the Respondent's use cannot be called fair or legitimate.

The Complainant has not authorized, licensed, or consented to the Respondent's registration and use of a domain name incorporating the trademarks, nor any confusingly similar variation thereof. Furthermore, to the Complainant's knowledge, there are no prior trademark applications or registrations in the name of the Respondent for any mark incorporating the JPM trademarks anywhere in the world. Based on the above, it is obvious that the Respondent lacks rights or legitimate interests in the disputed domain names.

The disputed domain names have been used to host websites passing themselves off as the Complainant's website or websites sponsored by or affiliated with the Complainant which at worst is used to steal consumers' personal information, and at best, simply confuses consumers.

The Respondent also appears to have utilized false contact information in the registration of at least two of the disputed domain names. Based on the Complainant's investigation, the address information provided for the disputed domain name <jpmtechmediaconference.com> is false, as there is no "Address g" located in New Delhi, India. Additionally, the Complainant notes that "Client" is commonly understood to be a person who is receiving the benefits or services, etc. of a third-party, such as a customer, and therefore, is unlikely to be an individual's last name. Moreover, the Complainant notes that the address information for <jpmhealthcareconference.org> and <jpmconference.org> are missing a house/unit number, and the contact information for <jpmhealthcareconference.org> is missing a last name for the Respondent.

In addition to the Respondent's obvious actual knowledge of the Complainant's trademarks by virtue of the fact that it created and posted websites impersonating the Complainant on the disputed domain names which are confusing similar to the Complainant's trademarks, the Respondent had constructive knowledge of the JPM trademarks because of the Complainant's registrations. The Respondent was clearly aware of the Complainant's rights in the Complainant's JPM trademarks when the Respondent acquired the disputed domain names, because the Respondent incorporated the JPM trademark into the disputed domain names and forwarded the disputed domain names to websites that pretend to be the Complainant.

The Complainant is not aware of any use of the Complainant's JPM trademarks in connection with financial services or financial and/or tech/media conferences, other than in connection with the Complainant. Similarly, the use of the Complainant's JPM trademarks on the Respondent's websites hosted at the disputed domain names obviously refers to the Complainant. The disputed domain names are so obviously connected with the Complainant and its services that their very use by someone with no connection to the Complainant suggests opportunistic bad faith.

Finally, on March 5, 2025, the Complainant's counsel sent correspondence to the Registrar regarding the abusive nature of the disputed domain names and the Complainant's rights in its JPM trademarks. On April 30, 2025, the Complainant's counsel was advised that the Registrar had suspended the disputed domain names. For all of the reasons above, the Respondent's conduct undoubtedly constitutes bad-faith registration and use of the disputed domain names.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, the Complainant must prove each of the following:

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

Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder. In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

As regards common control, the Panel notes that the Complainant has demonstrated similarities in the registrants' contact information including email addresses and postal addresses. Additionally, the Complainant has demonstrated similarities in regards to the content and layout of the websites corresponding to the disputed domain names. In fact, two of the disputed domain names resolve to the very same website. Finally, all of the disputed domain names have similar naming patterns. All of them incorporate the JPM trademark entirely in combination with the term "conference".

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants in a single proceeding.

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.

According to the submitted evidence, the Complainant is the owner of the registered trademark JPM. The disputed domain names <jpmhealthcareconference.org>, <jpmtechmediaconference.com> and <jpmconference.org> incorporate the trademark in its entirety with the addition of descriptive terms related to conferences. The Complainant's trademark is readily recognizable in the disputed domain names and the addition of the descriptive terms does not prevent a finding of confusing similarity. It is standard practice to disregard the gTLD under the confusingly similar test.

Having the above in mind, the Panel concludes that the disputed domain names are confusingly similar to the Complainant's trademark and that the Complainant has proven the requirement under paragraph 4(a)(i) of the Policy.

B. Rights or Legitimate Interests

The Complainant must show, at least prima facie, that the Respondent has no rights or legitimate interests with respect to the disputed domain names. The Respondent may establish a right or legitimate interest in the disputed domain names by demonstrating any of the following non-exhaustive circumstances listed in paragraph 4(c) of the Policy:

(i) that it has made preparations to use the disputed domain names or a name corresponding to the disputed domain names in connection with a bona fide offering of goods or services prior to any notice of the dispute; or

(ii) that it is commonly known by the disputed domain names, even if it has not acquired any trademark rights; or

(iii) that it is making a legitimate, noncommercial or fair use of the disputed domain names without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark.

The Complainant's trademark registrations for JPM predate the Respondent's registration of the disputed domain names. The Complainant has not licensed, approved or in any way consented to the Respondent's registration and use of the trademarks in the disputed domain names.

The evidence indicates that the Respondent has attempted to create an impression of websites created by, belonging to, or endorsed by the Complainant. The Respondent's websites, to which the disputed domain names resolve, not only display the JPM trademark, they also provide general information about the Complainant's conferences, including the actual dates and locations. Furthermore, the Respondent's websites contain hotel booking services and encourage website visitors to provide personal and financial information. Thus, consumers may falsely believe that the websites and the services offered are presented by the Complainant. Given the above, the Respondent is not making a bona fide offering of goods or services nor a legitimate noncommercial or fair use of the disputed domain names without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark.

Although given the opportunity, the Respondent has not rebutted the Complainant's prima facie case. The Respondent has not submitted any Response or any evidence in this case to demonstrate that the

Respondent is the owner of any trademark rights similar to the disputed domain names or that the Respondent is or has been commonly known by the disputed domain names.

By not submitting a response, the Respondent has failed to invoke any circumstances which could demonstrate, pursuant to paragraph 4(c) of the Policy, any rights or legitimate interests in respect of the disputed domain names. Thus, there is no evidence in the case that refutes the Complainant's submissions, and the Panel concludes that the Complainant has also proved the requirement under paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

Under paragraph 4(b) of the Policy, evidence of bad faith registration and use include without limitation:

(i) circumstances indicating the disputed domain names were registered or acquired primarily for the purpose of selling, renting, or otherwise transferring the disputed domain name registrations to the owner of a trademark or to a competitor of the trademark owner, for valuable consideration in excess of the documented out-of-pocket costs directly related to the disputed domain names; or

(ii) circumstances indicating that the disputed domain names were registered in order to prevent the owner of a trademark from reflecting the mark in a corresponding domain name, provided there is a pattern of such conduct; or

(iii) circumstances indicating that the disputed domain names were registered primarily for the purpose of disrupting the business of a competitor; or

(iv) circumstances indicating that the disputed domain names have intentionally been used in an attempt to attract, for commercial gain, Internet users to a website or other online location, by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of the website or location or of a product or service on that website or location.

The Complainant has submitted evidence demonstrating that the Respondent is creating a false impression that the disputed domain names and the corresponding websites are provided by or endorsed by the Complainant. On the websites, to which the disputed domain names resolve, the Respondent is reproducing the Complainant's trademarks in combination with information regarding the Complainant's upcoming conferences. Considering that the Respondent is reproducing the Complainant's trademarks without permission on the websites to which the disputed domain names resolve, the Panel finds, in the absence of contrary evidence, that the Respondent knew or should have known of the Complainant's trademarks when the Respondent registered and used the disputed domain names.

Thus, the evidence in the case before the Panel indicates that the disputed domain names have intentionally been used in an attempt to attract, for commercial gain, Internet users to the Respondent's websites by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of the websites or of a product or service on the websites.

There is no evidence in the case that refutes the Complainant's submissions.

The Panel concludes that the Complainant has proved the requirements under paragraph 4(b) of the Policy and that the disputed domain names <jpmhealthconference.org>, <jpmtechmediaconference.com> and <jpmconference.org> have been registered and are being used in bad faith.

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 <jpmconference.org>, <jpmhealthcareconference.org> and <jpmtechmediaconference.com> shall be transferred to the Complainant.

/Johan Sjöbeck/

Johan Sjöbeck

Sole Panelist

Date: August 26, 2025