

ADMINISTRATIVE PANEL DECISION

Chubb INA Holdings Inc. (“Chubb”) v. Bin G Glu
Case No. D2025-2941

1. The Parties

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

The Respondent is Bin G Glu, China.

2. The Domain Name and Registrar

The disputed domain name <chubbinsurancecompany.com> (the “Domain Name”) 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 July 23, 2025. On July 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On July 24, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 25, 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 July 28, 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 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 18, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 21, 2025.

The Center appointed Piotr Nowaczyk as the sole panelist in this matter on August 27, 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 is an insurance and financial services company that offers a range of insurance and risk management products and services. It operates in 54 countries and territories and employs approximately 40,000 people worldwide.

The Complainant is the owner of numerous CHUBB trademark registrations, including:

- the United States Trademark Registration for CHUBB (word) No. 1729813, registered on November 3, 1992;
- the United States Trademark Registration for CHUBB (word) No. 5570731, registered on September 25, 2018; and
- the United States Trademark Registration for CHUBB (word) No. 5586289, registered on October 16, 2018.

The Complainant also owns the domain name <chubb.com>, which incorporates its CHUBB trademark and serves as its official website.

The Domain Name was registered on August 21, 2004.

The Complainant submits that the Domain Name resolves to rotating webpages, including fake virus alerts and a deceptive “security check” prompt likely installing malware, and has also redirected users to third-party sites for the Respondent’s presumed commercial gain.

As of the date of this Decision, the Domain Name redirects users to deceptive webpage displaying fake virus alerts and “security check” prompts designed to facilitate malware installation.

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 Domain Name.

First, the Complainant contends that the Domain Name is confusingly similar to the trademark in which the Complainant has rights.

Second, the Complainant argues that the Respondent has neither rights nor legitimate interests in the Domain Name.

Third, the Complainant submits that the Domain Name was registered and is being used in bad faith.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy places a burden on the Complainant to prove the presence of three separate elements, which can be summarized as follows:

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

The requested remedy may only be granted if the above criteria are met. At the outset, the Panel notes that the applicable standard of proof in UDRP cases is the “balance of probabilities” or “preponderance of the evidence”. See section 4.2 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”).

A. Identical or Confusingly Similar

Under the first element, the Complainant must establish that the Domain Name is identical or confusingly similar to the trademark in which the Complainant has rights.

The Complainant holds valid registrations for the CHUBB trademark. The Domain Name incorporates this trademark in its entirety. As numerous UDRP panels have held, incorporating a trademark in its entirety is sufficient to establish that a domain name is identical or confusingly similar to that trademark. See *PepsiCo, Inc. v. PEPSI, SRL (a/k/a P.E.P.S.I.) and EMS COMPUTER INDUSTRY (a/k/a EMS)*, WIPO Case No. [D2003-0696](#).

The addition of the terms “insurance” and “company” in the Domain Name does not prevent a finding of confusing similarity between the Domain Name and the CHUBB trademark. Panels have consistently held that where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element. See section 1.8 of the [WIPO Overview 3.0](#).

The generic Top-Level Domain (“gTLD”) “.com” in the Domain Name is viewed as a standard registration requirement and as such is typically disregarded under the first element test. See section 1.11.1 of the [WIPO Overview 3.0](#).

Given the above, the Panel finds that the Domain Name is confusingly similar to the Complainant’s CHUBB trademark for purposes of the Policy. In sum, the Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Under the second requirement, the Complainant must prove that the Respondent has no rights or legitimate interests in the Domain Name.

The respondent may establish a right or legitimate interest in the domain name by demonstrating in accordance with paragraph 4(c) of the Policy any of the following:

- (i) that it has used or made preparations to use the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services prior to the dispute; or
- (ii) that it is commonly known by the domain name, even if it has not acquired any trademark rights; or

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

Based on the records, the Panel finds that the Complainant has established a prima facie case that the Respondent does not have any rights or legitimated interests in the Domain Name, and the burden of production of evidence shifts to the Respondent. See section 2.1 of the [WIPO Overview 3.0](#). Although given the opportunity, the Respondent has not submitted any evidence indicating that any of the circumstances foreseen in paragraph 4(c) of the Policy are present in this case.

On the contrary, it results from the evidence on record that the Complainant's CHUBB trademark registrations predate the Respondent's registration of the Domain Name. There is no evidence in the case record that the Complainant has licensed or otherwise permitted the Respondent to use its trademark or to register the Domain Name incorporating the trademark. There is also no evidence to suggest that the Respondent has been commonly known by the Domain Name.

Moreover, it results from the evidence on record that the Respondent does not make use of the Domain Name in connection with a bona fide offering of goods or services, nor does it make a legitimate noncommercial or fair use of the Domain Name. On the contrary, the Complainant demonstrated that the Domain Name resolved to rotating webpages, including fake virus alerts and a deceptive "security check" prompt likely installing malware, and also redirected users to third-party sites. As of the date of this Decision, the Domain Name redirects users to deceptive webpage displaying fake virus alerts and "security check" prompts designed to facilitate malware installation, which amounts to phishing. Such use of the Domain Name is inherently fraudulent and cannot confer any rights or legitimate interests upon the Respondent.

Finally, based on the composition of the Domain Name, which incorporates the Complainant's CHUBB trademark together with the terms "insurance" and "company" – descriptive references to the Complainant's service offering – the Domain Name carries a risk of confusion that prevents a finding of any rights or legitimate interests on the part of the Respondent.

In sum, 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 Domain Name. Thus, there is no evidence in the case file that refutes the Complainant's prima facie case. The Panel concludes that the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Under the third element, the Complainant must prove that the Domain Name has been registered and is being used in bad faith.

Bad faith under the UDRP is broadly understood to occur where a respondent takes unfair advantage of or otherwise abuses a complainant's mark. See section 3.1 of the [WIPO Overview 3.0](#).

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

- (i) circumstances indicating the domain name was registered or acquired primarily for the purpose of selling, renting, or otherwise transferring the domain name registration 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 domain name; or
- (ii) circumstances indicating that the domain name was registered in order to prevent the owner of a trademark from reflecting the mark in a corresponding domain name, provided that the respondent has engaged in a pattern of such conduct; or
- (iii) circumstances indicating that the domain name was registered primarily for the purpose of disrupting the business of a competitor; or

(iv) circumstances indicating that the domain name has 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 a trademark as to the source, sponsorship, affiliation, or endorsement of the website or location or of a product or service on a website or location.

As indicated above, the Complainant's rights in the CHUBB trademark predate the registration of the Domain Name. The Panel finds that the Respondent was or should have been aware of the Complainant's trademark at the time of registration. This finding is supported by the composition of the Domain Name, which incorporates the Complainant's CHUBB trademark together with the terms "insurance" and "company", both of which are closely associated with the Complainant's business. Moreover, it has been proven to the Panel's satisfaction that the Complainant's CHUBB trademark is well known and unique to the Complainant, at least in the fields of insurance and financial services. Thus, the Respondent could not ignore the reputation of products and services under this trademark. In sum, the Respondent in all likelihood registered the Domain Name with the expectation of taking advantage of the reputation of the Complainant's CHUBB trademark.

Next, the Domain Name has been used by the Respondent in bad faith. As established above, the Complainant showed that the Domain Name resolved to rotating webpages featuring fake virus alerts and deceptive "security check" prompts likely intended to install malware, as well as redirecting users to third-party sites. As of the date of this Decision, the Domain Name continues to redirect users to deceptive webpage of this kind. UDRP Panels have held that the use of a domain name for such purposes as phishing, or malware distribution constitute bad faith. See section 3.4 of the [WIPO Overview 3.0](#).

Finally, the Complainant has demonstrated that the Respondent engaged in a pattern of cybersquatting by registering multiple domain names corresponding to different trademarks.

For the reasons discussed above, the Panel finds that the third element of the Policy has been established.

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 Domain Name <chubbinsurancecompany.com> be transferred to the Complainant.

/Piotr Nowaczyk/

Piotr Nowaczyk

Sole Panelist

Date: September 10, 2025