

ADMINISTRATIVE PANEL DECISION

Universal Services of America, LP d/b/a Allied Universal v. Michael Chavis,
allieduniversalgroup.net
Case No. D2025-3864

1. The Parties

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

Respondent is Michael Chavis, allieduniversalgroup.net, United States.

2. The Domain Name and Registrar

The disputed domain name <allieduniversalgroup.net> is 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 September 23, 2025. On September 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 24, 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) and contact information in the Complaint. The Center sent an email communication to Complainant on September 26, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on September 26, 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 Respondent of the Complaint, and the proceedings commenced on September 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 19, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on October 20, 2025.

The Center appointed Bradley A. Slutsky as the sole panelist in this matter on November 3, 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

Complainant is a California, United States, limited partnership established in 1957. Complainant provides security services and advanced technology solutions, among other services. Complainant operates in at least 90 countries and employs approximately 800,000 individuals worldwide. Complainant asserts that it is the third largest employer in North America and the seventh largest employer globally.

Complainant owns at least the following ALLIED UNIVERSAL marks:

Mark	Goods/Services (International Class)	Jurisdiction	Reg. No.	Reg. Date
ALLIED UNIVERSAL SECURITY SERVICES	41, 42, and 45	United States	5,136,112	February 7, 2017
ALLIED UNIVERSAL	37, 41, 42, and 45	United States	5,136,006	February 7, 2017

These marks cover a wide range of goods and services, including installation and maintenance of security systems, educational services in security guard training, and other security services such as executive protection, property surveillance, and fraud and identity theft protection services. The marks have been used in commerce since at least August 1, 2016.

The disputed domain name was registered on June 28, 2025. The disputed domain name does not resolve to a website.

Respondent is identified as Michael Chavis, with a listed organization of “allieduniversalgroup.net” and an address in Miami, Florida, United States.

5. Parties’ Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Notably, Complainant contends that the disputed domain name is confusingly similar to its ALLIED UNIVERSAL marks, adding only the word “group” and the “.net” generic Top-Level Domain (“gTLD”). Complainant argues that the addition of “group” “can be commonly used in connection with a seemingly authorized email.”

Complainant further argues that Respondent has no rights or legitimate interests in the disputed domain name given that Respondent is not affiliated with Complainant and “there is no evidence to suggest that Respondent has registered the Disputed Domain to advance legitimate interests or for the bona fide offering of legitimate goods or services.” Complainant notes that Respondent is known as Michael Chavis – not ALLIED UNIVERSAL. Observing that the disputed domain name does not resolve to a website, Complainant argues that the disputed domain name does not provide a basis for Respondent to be commonly known by the disputed domain name. Complainant argues that “[t]he entirety of the evidence demonstrates that Respondent illegitimately registered the [disputed domain name] in an apparent attempt to syphon off Complainant’s goodwill in Complainant’s ALLIED UNIVERSAL® Marks.”

Finally, Complainant asserts that the disputed domain was registered and is being used in bad faith in that “Respondent has attempted to take commercial advantage of Complainant’s ALLIED UNIVERSAL® Marks and commercial reputation in order to trade off Complainant’s goodwill.” Complainant argues that Respondent knew (and under 15 U.S.C. Section 1072 had constructive notice) of Complainant’s ALLIED UNIVERSAL marks when Respondent registered the disputed domain name on June 28, 2025, and that “it is apparent that Respondent registered the [disputed domain name] to trade off Complainant’s goodwill in the ALLIED UNIVERSAL® Marks and to confuse consumers into believing that Respondent’s website is affiliated or associated with Complainant when that is not the case. Given that Respondent also chose to attach the descriptor ‘GROUP’ at the end of Complainant’s federally registered ALLIED UNIVERSAL® Marks in the [disputed domain name], it is likely that 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. Respondent’s use of the [disputed domain name] could lead individuals to unwittingly participate in a fraudulent scheme and provide confidential information to Respondent, which would clearly amount to bad faith.”

B. Respondent

Respondent did not reply to Complainant’s contentions.

6. Discussion and Findings

Pursuant to paragraph 15(a) of the Rules, a panel in UDRP proceedings “shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable”.

Under paragraph 4(a) of the Policy, Complainant must prove the following:

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

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 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, “group”) 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 gTLD in a domain name “is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test.” [WIPO Overview 3.0](#), section 1.11.1.

Accordingly, 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 Respondent may demonstrate rights or legitimate interests in a disputed domain name.

“Any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate [Respondent’s] rights or legitimate interests to the domain name[s] for purposes of paragraph 4(a)(ii):

(i) before any notice to [Respondent] of the dispute, [Respondent’s] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or

(ii) [Respondent] (as an individual, business, or other organization) [has] been commonly known by the [disputed] domain name, even if [Respondent has] acquired no trademark or service mark rights; or

(iii) [Respondent is] making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue”. Policy, paragraph 4(c).”

Although the overall burden of proof in UDRP proceedings is on 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 Respondent. As such, where a complainant makes out a prima facie case that Respondent lacks rights or legitimate interests, the burden of production on this element shifts to Respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on Complainant). If Respondent fails to come forward with such relevant evidence, Complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted 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.

There is no evidence that Respondent has used or prepared to use the disputed domain name in connection with a bona fide offering of goods or services or has been commonly known by the disputed domain name, or is making a legitimate noncommercial or fair use of the disputed domain name. The only evidence of Respondent’s use of the disputed domain name is its passive holding of the disputed domain name, which does not resolve to a website. Passive holding of a domain name in some circumstances does not confer rights or legitimate interests under the Policy. *Sealy Technology LLC v. Domain Administrator, Fundacion Privacy Services LTD*, WIPO Case No. [D2025-2623](#) (“The Panel finally notes that the non-use of the disputed domain name does not establish any rights or legitimate interests on the part of the Respondent. In the absence of any credible evidence of preparation for a bona fide offering of goods or services, the Respondent cannot be considered to have rights or legitimate interests under the Policy.”). Complainant asserts that Respondent is not affiliated with Complainant and that Complainant has not authorized, licensed, or endorsed Respondent’s use the ALLIED UNIVERSAL marks. Further, Respondent is Michael Chavis, and while the Whois information indicates that Respondent’s organization is “allieduniversalgroup.net”, there is no evidence that Respondent has been commonly known by this name.

The Panel considers that Respondent’s use of “allieduniversalgroup.net” as its organization name does not confer rights or legitimate interests on Respondent under the circumstances of this case.

Accordingly, 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. Specifically, “the following circumstances, in particular but without limitation, 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 [Respondent has] registered or [Respondent has] 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 [Respondent’s] documented out-of-pocket costs directly related to the domain name; or

(ii) [Respondent has] 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 [Respondent has] engaged in a pattern of such conduct; or

(iii) [Respondent has] registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, [Respondent has] intentionally attempted to attract, for commercial gain, Internet users to [Respondent’s] website or other online location, by creating a likelihood of confusion with the complainant’s mark as to the source, sponsorship, affiliation, or endorsement of [Respondent’s] website or location or of a product or service on [Respondent’s] website or location.” Policy, paragraph 4(b).

“Given that the scenarios described in UDRP paragraph 4(b) are non-exclusive and merely illustrative, even where a complainant may not be able to demonstrate the literal or verbatim application of one of the above scenarios, evidence demonstrating that a respondent seeks to take unfair advantage of, abuse, or otherwise engage in behavior detrimental to the complainant’s trademark would also satisfy complainant’s burden.” [WIPO Overview 3.0](#), section 3.1.

In the present case, the Panel notes that Respondent registered the disputed domain name in June 2025 – many years after Complainant had established and registered its ALLIED UNIVERSAL marks. Given the reputation of Complainant’s marks, it is reasonable to conclude that Respondent was aware of them at the time of registration, [WIPO Overview 3.0](#), section 3.2.2. The incorporation of Complainant’s mark in its entirety, together with the descriptive term “group”, suggests an intent to create a false association with Complainant. These facts evidence bad faith. [WIPO Overview 3.0](#), section 3.2; *Universal Services of America, LP d/b/a Allied Universal v. Cybernet Systech Private Limited*, WIPO Case No. [D2018-1544](#) (“The Panel finds that the Respondent must have been aware of the Complainant and its reputation in the ALLIED Mark at the time the Respondent registered the Domain Name. ... The Respondent has provided no explanation, and none is immediately obvious, why an entity would register a domain name containing ‘allied’, ‘universal’ and ‘aus’ (an abbreviation used by the Complainant) and redirect the domain name containing links relating to security services, unless there was an awareness of and an intention to create a likelihood of confusion with ... the Complainant and its ALLIED Mark. In these circumstances, the Respondent’s conduct in registering the Domain Name when it was aware of the Complainant’s rights and lacked rights or legitimate interests of its own amounts to registration in bad faith.”); *Fenix International Limited v. Host Master, 1337 Services LLC*, WIPO Case No. [D2023-1050](#) (“the mere registration by an unauthorized party of a domain name that is identical or confusingly similar to a well-known trademark can, under certain circumstances, create a presumption of bad faith in itself”).

Panels have found that the non-use of a domain name – such as the disputed domain name at issue here not resolving to a website – would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the reputation of Complainant’s trademark and the composition of the disputed domain name (which incorporates the mark in whole, adding the term “group” – which implies one has reached the holding company for Complainant’s

business), and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Accordingly, the Panel finds that 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 <allieduniversalgroup.net> be transferred to Complainant.

/Bradley A. Slutsky/

Bradley A. Slutsky

Sole Panelist

Date: November 17, 2025