

## **ADMINISTRATIVE PANEL DECISION**

Association Générale Interprofessionnelle de Prévoyance et d'Investissement  
(A.G.I.P.I.) v. jiangli  
Case No. D2025-4431

### **1. The Parties**

The Complainant is Association Générale Interprofessionnelle de Prévoyance et d'Investissement (A.G.I.P.I.), France, represented by Dreyfus & associés, France.

The Respondent is jiangli, China.

### **2. The Domain Name and Registrar**

The disputed domain name <www.agipi.com> is registered with Dynadot Inc (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 28, 2025. On October 28, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 29, 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 (Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 31, 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 November 3, 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 November 4, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 24, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on November 25, 2025.

The Center appointed Gonalo M. C. Da Cunha Ferreira as the sole panelist in this matter on December 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**

The Complainant, Association G n rale Interprofessionnelle de Pr voyance et d'Investissement (A.G.I.P.I.), is a French association created in 1976. It provides savings, retirement, borrower insurance, welfare, and health protection solutions, operating in partnership with AXA. The Complainant maintains an online presence through the domain name <agipi.com>, registered in 1998.

The Complainant owns trademark registrations for AGIPI, including:

- European Union Trade Mark No. 015365497 (figurative), registered August 30, 2016;
- European Union Trade Mark No. 008455453 (figurative), registered October 7, 2010;
- French trademark No. 1638554, registered November 9, 1990.

The disputed domain name <wwwagipi.com> was registered on June 22, 2025, with Dynadot Inc. The Registrar identified the underlying registrant as jiangli, located in China. Prior to disclosure, the registrant's identity was masked by a privacy service.

According to the evidence submitted, at the time of filing the Complaint, the disputed domain name resolved to a parking page displaying commercial pay-per-click links. The Complainant sent multiple notices to the Registrar requesting the blocking of the disputed domain name. The Registrar replied that such matters should be addressed under the UDRP.

There is no evidence of any relationship between the Parties, nor of any authorization granted by the Complainant for the registration or use of the disputed domain name.

#### **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 contends that:

1. the disputed domain name <wwwagipi.com> reproduces entirely the Complainant's AGIPI trademark, with the mere fusion of "www" and "agipi", which increases the likelihood of confusion;
2. the composition of the disputed domain name may lead Internet users to believe that it corresponds to an official website of the Complainant;
3. the disputed domain name resolves to a parking page displaying commercial advertising links, including links related to insurance services similar to those offered by the Complainant;
4. the disputed domain name is a typosquatting variant of the Complainant's official domain name, resulting from the deletion of the dot between "www" and "agipi";
5. the Respondent is neither affiliated with nor authorized by the Complainant to use the AGIPI trademark;
6. the Respondent has no rights or legitimate interests in the disputed domain name;
7. the pay-per-click links displayed on the parked website are likely to generate revenue for the Respondent and cannot constitute a bona fide offering of goods or services;

8. prior to this proceeding, the Complainant attempted to resolve the matter amicably, but the Respondent did not cooperate;
9. the Respondent registered the disputed domain name with knowledge of the Complainant's longstanding trademark rights;
10. the Respondent registered and is using the disputed domain name in bad faith by diverting Internet users for commercial gain through the creation of initial interest confusion.

## **B. Respondent**

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

## **6. Discussion and Findings**

### **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 for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the Complainant's AGIPI trademark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. The applicable Top-Level Domain ".com" is disregarded for the purpose of this assessment. [WIPO Overview 3.0](#), section 1.11.

Although the addition of the prefix "www" fused to the mark may bear on the assessment of the second and third elements, the Panel finds that such addition does not prevent a finding of confusing similarity between the disputed domain name and the Complainant's mark. [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.

The Complainant asserts that it has not authorized the Respondent to use its AGIPI trademark in any manner. The Respondent is not commonly known by the disputed domain name. The disputed domain name resolves to a parked page displaying pay-per-click links relating to insurance products, including competitors of the Complainant. Such use does not constitute a bona fide offering of goods or services nor a legitimate noncommercial or fair use. [WIPO Overview 3.0](#), section 2.9.

The Respondent has not submitted any response or provided any evidence of rights or legitimate interests in the disputed domain name.

The Panel therefore finds that the second element of paragraph 4(a) of the Policy has been satisfied.

### **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 notes that the Respondent has used the disputed domain name to resolve to a parking page displaying pay-per-click links relating to insurance services, including those competing with the Complainant. The Respondent has therefore intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's AGIPI trademark as to the source, sponsorship, affiliation, or endorsement of the website. This circumstance falls within paragraph 4(b)(iv) of the Policy.

The composition of the disputed domain name, consisting of the AGIPI mark preceded by "www" without a separating dot, constitutes a typographical variant of the Complainant's official domain name. Panels have found that typosquatting, by its nature, is indicative of bad faith registration and use. [WIPO Overview 3.0](#), section 3.4.

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, and other circumstances may also be relevant in assessing bad faith. Considering the distinctiveness of the AGIPI mark and its long-standing use predating the registration of the disputed domain name, the Panel finds it more likely than not that the Respondent knew, or should have known, of the Complainant's trademark rights when registering the disputed domain name. [WIPO Overview 3.0](#), section 3.2.1.

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 <wwwagipi.com> be transferred to the Complainant.

*/Gonçalo M. C. Da Cunha Ferreira/*

**Gonçalo M. C. Da Cunha Ferreira**

Sole Panelist

Date: December 12, 2025