

## ADMINISTRATIVE PANEL DECISION

Allstate Insurance Company v. Chris Rivers, Insuralead  
Case No. D2025-5048

### 1. The Parties

Complainant is Allstate Insurance Company, United States of America (“United States”), represented by SILKA AB, Sweden.

Respondent is Chris Rivers, Insuralead, United States.

### 2. The Domain Name and Registrar

The Disputed Domain Name <allstates-insurance.agency> 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 December 4, 2025. On December 5, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On December 8, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to Complainant on December 9, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on December 11, 2025.

The Center verified that the Complaint together with the amendment to the 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 December 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 1, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on January 5, 2026.

The Center appointed Richard W. Page as the sole panelist in this matter on January 13, 2026. 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 was established in 1931 and is headquartered in Northbrook, Illinois, United States. Complainant is a major provider of insurance in the United States, operating across all 50 states and in Canada. Its portfolio encompasses a wide range of insurance lines, including coverage for automobiles, homes, life, and businesses.

Services are delivered through a comprehensive network of agents who provide personalized guidance and support to clients. As of 2024, Complainant maintained approximately 208 million active policies, employed over 55,000 individuals, and worked with more than 27,700 direct agents. It enjoys a strong reputation for customer service, consistently achieving high satisfaction ratings, and is ranked 187<sup>th</sup> on Forbes' Global 2000 list of the world's largest public companies.

Complainant owns an extensive portfolio of trademarks featuring or incorporation the term ALLSTATE (the "ALLSTATE Mark"), registered across numerous countries and territories worldwide, including but not limited to, the following:

United States Registration No. 717,683 ALLSTATE word mark registered June 27, 1961 in international class 36 with a first use in 1957;

United States Registration 840,187 ALLSTATE device mark, registered December 5, 1967 in international class 36 with first use in 1966; and

Canadian Registration No. TMA283788 ALLSTATE word mark, registered September 30, 1983 in international classes 35, 36, 41, and 42.

In addition, Complainant has prevailed in numerous UDRP decisions recognizing that the ALLSTATE Mark has a strong reputation and well-established status.

Complainant has established a strong online presence for decades through the domain name <allstate.com> which has been registered since May 10, 1995 and which provides information for users regarding quotes, payments ID cards, and policy updates and through the website <allstateinsuranceagency.com> registered on October 14, 2009 which provides information regarding Complainant's network of agents.

The Disputed Domain Name was registered on June 27, 2024 and resolves to a website which contains content plus the look and feel of Complainant's official website. The Disputed Domain Name is enrolled in a mail exchange (MX) allowing for the sending and receipt of email.

#### **5. Parties' Contentions**

##### **A. Complainant**

Complainant contends that it has enforceable trademark rights in the ALLSTATE Mark for purposes of this proceeding and that the Disputed Domain Name is confusingly similar to the ALLSTATE Mark. The entirety of the ALLSTATE Mark is included in the Disputed Domain Name. The addition of the letter "s," a hyphen and the word "insurance" to the Disputed Domain Name does not prevent a finding of confusing similarity.

Complainant further contends that it is widely recognized for its innovative approach, particularly in harnessing technology to optimize insurance processes, as well as for incentive programs designed to promote safe driving behavior.

Complainant further contends that it has not authorized Respondent to use the ALLSTATE Mark in the Disputed Domain Name or in any other way. Complainant further contends that Respondent is in no way related to or affiliated with Complainant.

Complainant submits that it has not found any evidence that Respondent is commonly known by the Disputed Domain Name.

Complainant further submits that the Disputed Domain Name resolves to a website which prominently displays "All States Insurance" at the top together with the message "Serving all 50 States" and using a similar look and feel to Complainant's official website. Complainant further submits that Respondent's website even reproduces the logo at the top in blue, as well as a list of the services offered with their corresponding icons and a separate list of icons representing significant figures of interest regarding Respondent's illegitimate activities.

Complainant further submits that the Disputed Domain Name and the website to which it resolves are designed to make an Internet user believe that Respondent has a relationship with Complainant or is, in fact, Complainant. Complainant further submits that such use of the Disputed Domain Name can neither be bona fide nor legitimate, hence Respondent has no rights or legitimate interests in the Disputed Domain Name.

Complainant alleges that the actions of Respondent satisfy the criteria of paragraph 4(b)(iv) of the Policy and are hence in bad faith. Complainant further alleges that Respondent's passing off of its website as related to Complainant can never confer rights or legitimate interests in the Disputed Domain Name and constitutes bad faith registration and use of the Disputed Domain Name.

Complainant contends that it has satisfied each of the three elements required under the Policy for a transfer of the Disputed Domain Name.

## **B. Respondent**

Respondent did not reply to Complainant's contentions.

## **6. Discussion and Findings**

Paragraph 15(a) of the Rules instructs the Panel as to the principles the Panel is to use in determining the dispute: "A Panel shall decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules, and any rules and principles of law that it deems applicable."

Even though Respondent has failed to file a Response or to contest Complainant's assertions, the Panel will review the evidence proffered by Complainant to verify that the three essential elements of the claims are met. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.3.

Paragraph 4(a) of the Policy directs that Complainant must prove each of the following three elements:

- i) that the Disputed Domain Name registered by Respondent is identical or confusingly similar to the ALLSTATE Mark in which Complainant has rights; and,
- ii) that Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and,
- iii) that the Disputed Domain Name has been registered and is being used in bad faith.

## **A. Identical or Confusingly Similar**

[WIPO Overview 3.0](#), section 1.2.1 states that registration of the ALLSTATE Mark is *prima facie* evidence of Complainant having enforceable rights in the ALLSTATE Mark.

Complainant has shown rights in respect of the ALLSTATE Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

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 ALLSTATE Mark and the Disputed Domain Name. [WIPO Overview 3.0](#), section 1.7.

The entirety of the ALLSTATE Mark is reproduced within the Disputed Domain Name. Accordingly, the Disputed Domain Name is confusingly similar to the ALLSTATE Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms, here the letter “s,” a hyphen, and the word “insurance,” may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the Disputed Domain Name and the ALLSTATE Mark for the purposes of the Policy. [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 allows three nonexclusive methods for the Panel to conclude that Respondent has rights or legitimate interests in the Disputed Domain Name:

- (i) before any notice to you [Respondent] of the dispute, your 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) you [Respondent] (as an individual, business, or other organization) have been commonly known by the Disputed Domain Name, even if you have acquired no trademark or service mark rights; or
- (iii) you [Respondent] are making a legitimate noncommercial or fair use of the Disputed Domain Name, without intent for commercial gain to mislead consumers or to tarnish the ALLSTATE Mark.

Although the overall burden of proof in UDRP proceedings is on Complainant, panels have recognized that proving Respondent lacks rights or legitimate interests in the Disputed 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 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 Disputed 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.

Panels have held that the use of the Disputed Domain Name for illegitimate activity, here claimed as impersonation/passing off, can never confer rights or legitimate interests on 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**

Paragraph 4(b) of the Policy sets forth four nonexclusive criteria for Complainant to show bad faith registration and use of the Disputed Domain Name:

- (i) circumstances indicating that you [Respondent] have registered or you have acquired the Disputed Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Disputed Domain Name registration to Complainant who is the owner of the ALLSTATE Mark or to a competitor of Complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the Disputed Domain Name; or
- (ii) you [Respondent] have registered the Disputed Domain Name in order to prevent the owner of the ALLSTATE Mark from reflecting the ALLSTATE Mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or
- (iii) you [Respondent] have registered the Disputed Domain Name primarily for the purpose of disrupting the business of a competitor; or
- (iv) by using the Disputed Domain Name, you [Respondent] have intentionally attempted to attract, for commercial gain, Internet users to your website or other online location, by creating a likelihood of confusion with the ALLSTATE Mark as to the source, sponsorship, affiliation, or endorsement of your website or location or of a product on your website or location.

In the present case, the Panel finds that Respondent's activities satisfy the requirement of paragraph 4(b)(iv) of the Policy by intentionally attempting to attract, for commercial gain, Internet users by creating a likelihood of confusion with the ALLSTATE Mark.

Panels have held that the use of the Disputed Domain Name for illegitimate activity, here claimed as impersonation/passing off, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds Respondent's registration and use of the Disputed Domain Name constitutes bad faith under the Policy.

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 <allstates-insurance.agency> be transferred to the Complainant.

*/Richard W. Page/*

**Richard W. Page**

Sole Panelist

Date: January 20, 2026