

ADMINISTRATIVE PANEL DECISION

Universal Services of America LP, d/b/a Allied Universal v. Jennifer Louis
Case No. D2025-5391

1. The Parties

Complainant is Universal Services of America LP, d/b/a Allied Universal, United States of America (“United States”), represented by Fish & Richardson P.C., United States.

Respondent is Jennifer Louis, United States.

2. The Domain Name and Registrar

The disputed domain name <allied-universal-services.net> is registered with Squarespace Domains LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 23, 2025. On December 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 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 (“REDACTED FOR PRIVACY”) and contact information in the Complaint. The Center sent an email communication to Complainant on December 26, 2026, 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 December 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 January 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was January 27, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on February 4, 2026.

The Center appointed Jeffrey M. Samuels as the sole panelist in this matter on February 12, 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 Universal Services of America, LP, d/b/a Allied Universal, was established in 1957, and is one of the world's largest security services companies. Complainant operates in at least 90 countries around the world, providing its clients with the benefit of working with a USD 18 billion company with a workforce of approximately 800,000 employees globally.

Complainant owns numerous trademark registrations around the world for its ALLIED UNIVERSAL mark. These include registrations issued in the United States (Registration No. 5136006), Canada (Registration No. TMA1017221), and Uruguay (Registration No. 546862). The mark was registered in the United States on February 7, 2017, in Canada on March 13, 2019, and in Uruguay on August 15, 2025. Complainant has continuously used its ALLIED UNIVERSAL mark in connection with its security-related services since at least as early as 2016.

The disputed domain name was registered on November 3, 2025. The disputed domain name resolves to a placeholder webpage with no active content. The webpage merely includes the following comment at the bottom of the page: "We're under construction. Please check back for an update soon."

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 Respondent registered a domain name that is confusingly similar to the ALLIED UNIVERSAL trademark. Complainant notes that the disputed domain name contains the entirety of the mark, adding only the descriptor term "services" and the generic Top-Level Domain ".net."

Complainant further asserts that Respondent has no rights or legitimate interests in the disputed domain name. According to Complainant, there is no evidence that Respondent is commonly known by the disputed domain name, Respondent is not associated or affiliated with Complainant, and Complainant has not granted any rights or permissions to Respondent to use the ALLIED UNIVERSAL trademark or the disputed domain name. Further, Complainant maintains, Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services or making a legitimate noncommercial or fair use. As noted above, the disputed domain name resolves to an inactive website. According to Complainant, "[p]assive holding of a domain is evidence that registrant lacks rights or legitimate interests in that domain." Respondent, Complainant argues, "only uses the Infringing Domain to unfairly exploit the ALLIED UNIVERSAL trademark and associated goodwill belonging to Complainant. That is not a legitimate commercial or noncommercial use of the domain."

With respect to the issue of "bad faith" registration and use, Complainant alleges that "Respondent cannot credibly claim it registered the Dispute[d] Domain with no actual knowledge of Complainant and its rights in the ALLIED UNIVERSAL Marks." Complainant points out that it first used the ALLIED UNIVERSAL mark in 2016, long prior to registration of the disputed domain name, and that Complainant is one of the world's largest private security providers.

Complainant contends that Respondent's use of the disputed domain name, which includes the term "services," could lead individuals to unwittingly participate in a fraudulent scheme and provide confidential information to Respondent, "which would clearly amount to bad faith."

The non-use of the disputed domain name "does not prevent a finding of bad faith under the doctrine of passive holding," Complainant maintains. Complainant asserts that its ALLIED UNIVERSAL marks are distinctive and well-known, that Respondent concealed her true identity by registering the disputed domain name through the Registrar's privacy service, and that "there are no plausible good faith reasons for Respondent to register and use the Disputed Domain under the circumstances. As discussed, Respondent had to have known of Complainant's longstanding use and rights in the ALLIED UNIVERSAL Marks when it registered the Disputed Domain. So, for Respondent to proceed with registering the Disputed Domain anyways, it is obvious that Respondent lacks good intentions. Instead, the totality of circumstances indicates the opposite – that Respondent intentionally targeted Complainant and intended to use the Disputed Domain to profit off of Complainant's trademark rights and confuse consumers."

B. Respondent

Respondent did not reply to 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 ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the mark is reproduced within the disputed domain name. The addition of the descriptive term "services" in the disputed domain name does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), 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 that 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 3.1](#), 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.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Panels have found that the non-use of a domain name, including, as the case here, a blank or "coming soon" page, would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, and taking into consideration the distinctiveness and reputation of Complainant's mark, the composition of the disputed domain name, and Respondent's failure to submit a Response, the Panel finds that the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

The case file supports a determination that Complainant's ALLIED UNIVERSAL mark is distinctive, that Respondent was more likely than not to have been aware of Complainant and its ALLIED UNIVERSAL mark at the time of registration of the disputed domain name, and that there are no plausible good faith reasons for Respondent to have registered the disputed domain name. The inclusion of the term "services" in the disputed domain name heightens the possibility that a user of the Internet is likely to conclude, wrongly, that there is some connection between the Parties, given that Complainant offers services under its ALLIED UNIVERSAL mark. In short, the case file supports a determination that Respondent targeted Complainant and its ALLIED UNIVERSAL mark at the time the disputed domain name was registered.

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 <allied-universal-services.net> be transferred to Complainant.

/Jeffrey M. Samuels/

Jeffrey M. Samuels

Sole Panelist

Date: February 20, 2026