

## **ADMINISTRATIVE PANEL DECISION**

Chubb INA Holdings Inc. v. Marcus Jeffrey, Combined Chubb, and Jeffrey Marcus

Case No. D2026-1423

### **1. The Parties**

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

Respondents are Marcus Jeffrey, Combined Chubb, United States, and Jeffrey Marcus, United States.

### **2. The Domain Names and Registrars**

The disputed domain names <combinedchubb.com>, <hellocombinedchubb.com>, and <infocombinedchubb.com> are registered with GoDaddy.com, LLC; the disputed domain name <gocombinedchubb.com> is registered with Global Domain Group LLC (collectively, the “Registrars”). Collectively, these disputed domain names are referred to as the “Domain Names.”

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 2, 2026. On April 7, 2026, the Center transmitted by email to the Registrars a request for registrar verification in connection with the Domain Names. On April 7, and April 9, 2026, the Registrars transmitted by email to the Center their verification responses, disclosing registrant and contact information for the Domain Names, which differed from the named Respondent (Unlisted / Super Privacy Service LTD c/o Global Domain Group, Global Domain Group Privacy Service) and contact information in the Complaint.

The Center sent an email communication to Complainant on April 10, 2026 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting Complainant to either file separate complaint(s) for the disputed domain names associated with a different underlying registrant or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all Domain Names are under common control. Complainant filed an amended Complaint on April 13, 2026.

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 Respondents of the Complaint, and the proceedings commenced on April 15, 2026. In accordance with the Rules, paragraph 5, the due date for the Response was May 5, 2026. The Response was filed with the Center by Respondent Marcus Jeffrey, Combined Chubb on April 15, 2026.

The Center appointed John C. McElwaine as the sole panelist in this matter on April 21, 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 is a leading global insurance group headquartered in the United States. Complainant (through predecessor companies) has offered insurance services for over a century and now operates in 54 countries. Complainant and its affiliates provide personal and commercial property and casualty insurance, life insurance, reinsurance, and related financial services worldwide. Complainant's subsidiary Combined Insurance Company of America has used the COMBINED mark in the insurance industry for over 100 years. Complainant owns numerous trademark registrations for its CHUBB and COMBINED marks around the world, including but not limited to the following United States trademark registrations:

- CHUBB, U.S. Reg. No. 1,729,813, registered November 3, 1992 in Class 36;
- COMBINED INSURANCE COMPANY OF AMERICA, U.S. Reg. No. 669,093, registered October 28, 1958, in Class 36; and
- COMBINED, U.S. Reg. No. 5,783,614, registered June 18, 2019, in Class 35.

Complainant's registered trademark rights are referred to as the "CHUBB and COMBINED Marks".

Respondents registered the Domain Names over a span of several months: <combinedchubb.com> on October 29, 2025; <infocombinedchubb.com> and <hellocombinedchubb.com> on November 5, 2025; and <gocombinedchubb.com> on February 23, 2026. The record shows that until recently, Respondents used the Domain Names <combinedchubb.com>, <infocombinedchubb.com>, and <hellocombinedchubb.com> to redirect Internet users to Complainant's official website. The fourth Domain Name, <gocombinedchubb.com>, currently also redirects to Complainant's official website.

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

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

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

As an initial matter, Complainant argues that consolidation is appropriate because all of the Domain Names follow the same naming convention whereby Complainant's name and trademarks COMBINED and CHUBB are used as a joint term, were registered on or around the same date, engaged in unauthorized redirection to Complainant's official website, and were registered by the same domain name holder, namely Jeffrey Marcus. Complainant points out that although the registrant contact details include differing email addresses and phone numbers, the physical address listed for all four Domain Names is identical and the name is substantively identical.

With respect to the first element of the Policy, Complainant contends that the Domain Names are identical or confusingly similar to trademarks in which Complainant has rights. Complainant asserts that the Domain Names incorporate its well-known CHUBB and COMBINED marks in their entirety. According to Complainant, each Domain Name consists of the combination "combinedchubb". Complainant asserts that

the addition of common terms such as “hello”, “info”, or “go” to the Domain Names does nothing to prevent the confusing similarity with Complainant’s CHUBB and COMBINED marks. Accordingly, Complainant submits that the Domain Names are confusingly similar to marks in which Complainant has rights.

With respect to the second element of the Policy, Complainant asserts that Respondents have no connection or affiliation with Complainant and have never been authorized or licensed to use Complainant’s CHUBB or COMBINED Marks in any manner, including in a domain name. Complainant contends that Respondents are not commonly known by the Domain Names, as evidenced by the Whois data which list Jeffrey Marcus and registrant’s organization as “Combined Chubb” and which was likely adopted to create the impression of affiliation. Complainant further argues that Respondents’ use of the Domain Names to redirect Internet users to Complainant’s own website without permission is not a bona fide offering of goods or services, nor a legitimate noncommercial or fair use under the Policy. Rather, such use is deceptive and opportunistic, and creates a latent risk that Respondents could alter their use at any time for phishing, fraud, or impersonation. Complainant submits that it has established a prima facie case that Respondents lack rights or legitimate interests in the Domain Names, which Respondents have failed to rebut.

With respect to third element of the Policy, Complainant asserts that Respondents clearly targeted Complainant’s well-known CHUBB and COMBINED Marks when registering the Domain Names. Complainant notes that its CHUBB mark has been used since 1882 and that the COMBINED mark is also widely recognized in the insurance sector for over a century. By registering multiple Domain Names that incorporate these famous marks, Respondents’ actions demonstrate knowledge of Complainant’s rights and a deliberate intent to capitalize on them. Further, Complainant alleges that Respondents’ practice of using the Domain Names to redirect to Complainant’s official site evidences bad faith use: by controlling these confusingly similar Domain Names, Respondents “hold a loaded gun” that could be turned against Complainant at any time. Complainant points out that prior UDRP panels have held that redirecting domain names to a complainant’s own website without authorization constitutes bad faith, as it both misleads Internet users and creates an ongoing threat to the complainant. Complainant also highlights that Respondents’ registration pattern indicates a calculated scheme to exploit Complainant’s brand. Complainant concludes that Respondents have registered and are using the Domain Names in bad faith under paragraphs 4(a)(iii) and 4(b) of the Policy.

## **B. Respondents**

Respondent Marcus Jeffrey, Combined Chubb sent an email communication to the Center on April 15, 2026, offering to transfer all the Domain Names in exchange for fees ranging between USD 105,000 and USD 275,000, and asserted that it did not identify prior ownership rights in CHUBB when conducting its due diligence. It further added that it invested time and resources to develop a business around the Domain Names and expects profits from its business plan.

## **6. Discussion and Findings**

### **6.1. Consolidation: Multiple Respondents**

The amended Complaint was filed in relation to nominally different domain name registrants. Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. Complainant requests the consolidation of the disputes against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The registrant(s) of the Domain Names did not comment on Complainant’s request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing Complainant's request, the Panel will consider whether (i) the Domain Names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.11.2. As regards common control, the Panel notes that the names and contact details revealed by the Registrars are highly similar (two permutations of the same first and last name at identical postal addresses). Further, Respondent Marcus Jeffrey, Combined Chubb offered a transfer of the Domain Names to Complainant asserting its control over all four of them, and engaged in patent of conduct by registering four "combinedchubb"-formative Domain Names in close succession, each used to carry out the same scheme of redirecting Internet users to Complainant's website. These undisputed facts, together with the implausibility of mere coincidence in the selection and use of the Domain Names, convince the Panel that all Domain Names are controlled by a single entity.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. None of the Domain Name registrants commented on or otherwise opposed to Complainant's request. Moreover, consolidation promotes procedural efficiency given the connection between the Domain Names and their apparent common control.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different Domain Name registrants (referred to below as "Respondent") in a single proceeding.

## **6.2 Substantive Matters**

Paragraph 4(a) of the Policy requires that, in order to succeed in this UDRP proceeding, Complainant must prove its assertions with evidence demonstrating:

- (i) the Domain Names are 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 Domain Names; and
- (iii) the Domain Names have been registered and are being used in bad faith.

Having considered the Complaint, the Response, the Policy, the Rules, the Supplemental Rules, and applicable principles of law, the Panel's findings on each of the above-cited elements are as follows.

### **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 Domain Names. [WIPO Overview 3.1](#), section 1.7. Ownership of a trademark registration is generally sufficient evidence that a complainant has the requisite rights in a mark for purposes of paragraph 4(a)(i) of the Policy. [WIPO Overview 3.1](#), section 1.2.

Here, the Panel finds Complainant has established rights in the CHUBB and COMBINED trademarks through the unrefuted evidence of its longstanding use and multiple trademark registrations, including the sample United States registrations listed above.

The Panel also finds Complainant's CHUBB and COMBINED marks are reproduced in their entirety within the Domain Names. The addition of terms such as "hello", "info", or "go" before the CHUBB and COMBINED marks does not prevent a finding of confusing similarity, as the marks remain clearly recognizable in the Domain Names. The Panel concludes that the Domain Names are confusingly similar to trademarks in which Complainant has rights, and that the requirements of paragraph 4(a)(i) of the Policy are satisfied.

## B. Rights or Legitimate Interests

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 3.1](#), 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 Domain Names. 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 Domain Names such as those enumerated in the Policy<sup>1</sup> or otherwise.

The Panel notes that the registrant organization identified in the registration details for the Domain Name <gocombinedchubb.com> is “Combined Chubb”, however, there is no evidence before the Panel that Respondent is actually commonly known by the Domain Names or “Combined Chubb”.

Also, as it pertains to Complainant’s assertion that Respondent is not authorized by Complainant to use the CHUBB and COMBINED Marks, Respondent failed to submit any proof demonstrating a business relationship between the Parties that would vest Respondent with any rights or legitimate interests in the Domain Names. On the contrary, in its Response, Respondent mentioned its own “deliberate business strategy” and “business plan” “around the Domain Names” which implies Respondent has had no affiliation with Complainant.

Furthermore, the Panel took note of Respondent’s contention that it “invested substantial time and resources to develop a business around the Domain Names”, but finds that Respondent is not making bona fide use of the Domain Names under paragraph 4(c)(i) or (iii), as the Domain Names are currently being used to redirect to Complainant’s official website without its permission. *Gilead Sciences, Inc. v. WhoisGuard Protected, WhoisGuard, Inc. / Krug Jr Robert John*, WIPO Case No. [D2020-2662](#) (finding that the redirect of the disputed domain name <gilead-sciences.net> to complainant’s official website was not a bona fide use of the disputed domain name); *Bureau Veritas v. Xavier Garreau*, WIPO Case No. [D2017-1570](#) (“[T]he disputed domain name redirects to the Complainant’s official website, without authorization, which is likely to mislead Internet users into believing that the disputed domain name is connected to the Complainant’s business. In the Panel’s opinion, this does not claim for a use of the disputed domain name in connection with a bona fide offering of goods or services.”)

Instead, Respondent’s only use of the Domain Names appears to have been clearly intended to target Complainant. An offer to sell a domain name for an amount exceeding the respondent’s out-of-pocket expenses has been found not to be a bona fide use of the disputed domain name provided that profiting from the complainant’s mark was evident. *Express Scripts, Inc. v. TheSonicNet*, WIPO Case No. [DCO2010-0010](#); *Groupon, Inc. v. Whois Privacy Corp. / Ryan G Foo, PPA Media Services*, WIPO Case No. [D2014-2139](#).

The Panel finds that Respondent does not have rights or legitimate interests in the Domain Names and that Complainant has met its burden under paragraph 4(a)(ii) of the Policy.

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<sup>1</sup> The Policy, paragraph 4(c), provides a non-exhaustive list of circumstances in which a respondent could demonstrate rights or legitimate interests in a disputed domain name: “(i) before any notice to you of the dispute, your use of, or demonstrable 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; or (ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or (iii) you are 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 or service mark at issue.”

### C. Registered and Used in Bad Faith

According to paragraph 4(a)(iii) of the Policy, Complainant must show that Respondent registered and is using the Domain Names in bad faith. A non-exhaustive list of factors constituting bad faith registration and use is set out in paragraph 4(b) of the Policy.

Bad faith registration can be found where a respondent “knew or should have known” of a complainant’s trademark rights and nevertheless registered a domain name in which it had no rights or legitimate interests. See *Accor S.A. v. Kristen Hoerl*, WIPO Case No. [D2007-1722](#). While Respondent claimed it had not identified any registration related to CHUBB trademarks, the Panel notes Respondent registered the Domain Names combining both Complainant’s CHUBB trademark and COMBINED trademark and redirected them to Complainant’s official site. The Panel finds that Respondent’s registration of the Domain Names containing these two marks was not coincidental but rather driven by an intent to intentionally trade off the goodwill and reputation of Complainant’s trademark or otherwise create a false association with Complainant.

Respondent’s use of the Domain Names in bad faith is further borne out by the fact that Complainant has shown that Respondent is using the Domain Names to redirect traffic to Complainant’s official website. Prior UDRP panels have found that a respondent redirecting a domain name to the complainant’s website without authorization can establish bad faith because the respondent retains control over the redirection thus creating a real or implied ongoing threat to the complainant. See [WIPO Overview 3.1](#), section 3.1.4; see also *Hyatt Corporation, Hyatt International Corporation v. Victoria Cameron*, WIPO Case No. [D2022-4171](#); *Skyscanner Limited v. Domain Admin, Whois Privacy Corp.*, WIPO Case No. [D2019-0507](#) (redirecting of a disputed domain name to a complainant’s website supports a finding that respondent registered the disputed domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with complainant’s mark and/or disrupt complainant’s business).

The Panel finds that the redirection of the Domain Names to Complainant’s website may serve as furtherance of the impression of affiliation or connection with Complainant. The Panel is satisfied that Respondent is intentionally attempting to attract, for commercial gain Internet users to its websites or other online location, by creating a likelihood of confusion with Complainant’s marks as to the source, sponsorship, affiliation, or endorsement of its websites or location or of a product or service on its websites or location. According to Policy paragraph 4(b)(iv), this is evidence of registration and use in bad faith of the Domain Names.

In addition, paragraph 4(b)(i) of the Policy indicates that bad faith exists where a respondent acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant, for valuable consideration in excess of documented out-of-pocket costs directly related to the domain name. Here, the evidence establishes that the purpose of Respondent registering the Domain Names was most likely to sell one or more to Complainant and that the prices for the Domain Names seemingly far exceeded Respondent’s out-of-pocket expenses. As discussed above, Respondent’s offer to sell the Domain Names in exchange for fees ranging between USD 105,000 and USD 275,000 together with the redirection of the Domain Names to Complainant’s website establishes this intent. See *UK Insurance Limited v. PrivacyDotlink, Customer 28001 118 / Futureproof Domains*, WIPO Case No. [D2017-1584](#) (finding bad faith where respondent linked the domain name to form “for sale” webpage, demanded USD 500 for the domain name and threatened to raise the price for such sale by USD 100 every day an offer was not accepted).

Based upon the foregoing, Complainant has satisfied paragraph 4(a)(iii) 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 Domain Names, <combinedchubb.com>, <gocombinedchubb.com>, <hellocombinedchubb.com>, and <infocombinedchubb.com>, be transferred to Complainant.

*/John C McElwaine/*

**John C McElwaine**

Sole Panelist

Date: May 5, 2026