

ADMINISTRATIVE PANEL DECISION

Northern Trust Corporation v. zhou kun

Case No. D2026-2145

1. The Parties

The Complainant is Northern Trust Corporation, United States of America (“United States”), represented by Dentons US LLP, United States.

The Respondent is zhou kun, China.

2. The Domain Name and Registrar

The disputed domain name <northerntrusts.com> is registered with Gname.com Pte. Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on May 18, 2026. On May 19, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 20, 2026, 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 the Complainant on May 26, 2026, 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 in English on May 29, 2026.

On May 26, 2026, the Center informed the Parties in Chinese and English, that the language of the Registration Agreement for the disputed domain name is Chinese. On May 29, 2026, the Complainant requested English to be the language of the proceeding. The Respondent did not submit any comment on the Complainant’s submission.

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 in Chinese and English of the Complaint, and the proceedings commenced on June 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on June 23, 2026.

The Center appointed Deanna Wong Wai Man as the sole panelist in this matter on July 1, 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

The Complainant is Northern Trust Corporation, a financial services company headquartered in the United States whose predecessor was founded in 1889 under the name "Northern Trust". The Complainant employs over 22,000 people and operates offices throughout 19 states of the United States and 22 other locations across Canada, Europe, the Middle East, and the Asia-Pacific region. It provides asset servicing, fund administration, asset management, fiduciary and banking solutions for corporations, institutions, families and individuals worldwide, and has received industry recognition for its financial services.

The Complainant owns a trademark portfolio containing numerous trademark registrations for the mark NORTHERN TRUST, including, but not limited to, United States Patent and Trademark Office ("USPTO") Registration No. 1001355 for NORTHERN TRUST, registered on January 7, 1975, and USPTO Registration No. 5380734 for NORTHERN TRUST, registered on January 16, 2018, both in International Class 36.

The disputed domain name, <northerntrusts.com>, was registered on January 25, 2026, i.e. years after the registration date of the Complainant's aforementioned trademark registrations. Based on the evidence, the disputed domain name resolves to a website predominantly in English, promoting online casino, betting and gambling services under the name "金剛 KingKong". The website includes login and registration interfaces through which users are invited to create or access an account.

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 the disputed domain name is confusingly similar to its NORTHERN TRUST trademark because it incorporates the trademark in its entirety, differing only by the addition of the letter "s", which does not prevent a finding of confusing similarity.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Complainant submits that it has not authorized the Respondent to use its NORTHERN TRUST trademark, that the Respondent is not affiliated with or commonly known by the disputed domain name, and that the Respondent has not used, or made demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use. Instead, the Complainant contends that the disputed domain name resolves to a website promoting online casino, betting and gambling services under the name "金剛 KingKong", which includes login and registration pages requesting users' personal information. The Complainant further submits that the Respondent is using the disputed domain name to mislead Internet users into believing they are dealing with the Complainant and to facilitate the collection of personal or financial information.

The Complainant contends that the disputed domain name was registered and is being used in bad faith. The Complainant submits that, given the longstanding use, reputation and international recognition of its NORTHERN TRUST trademark, the Respondent was aware of the Complainant's rights when registering the disputed domain name. The Complainant further contends that the Respondent intentionally registered a typosquatted version of its trademark to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's trademark. The Complainant also submits that the Respondent is using the disputed domain name to impersonate or falsely suggest an association with the Complainant in order to divert Internet users to a gambling website and facilitate phishing or other fraudulent activity through the collection of users' personal or financial information.

B. Respondent

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

6. Discussion and Findings

6.1 Preliminary Issue: Language of the Proceeding

The language of the Registration Agreement for the disputed domain name is Chinese. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint and amended Complaint were filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including that the disputed domain name comprises the English words "northern" and "trusts" rather than Chinese script, the website to which the disputed domain name resolves contains both English and Chinese content, the disputed domain name is an English-language typosquatted version of the Complainant's NORTHERN TRUST trademark demonstrating the Respondent's familiarity with English, and requiring the Complaint to be translated into Chinese would unfairly burden the Complainant and delay the proceeding.

The Respondent did not make any submissions with respect to the language of the proceeding.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs (see WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.5.1).

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

6.2 Decision on the Merits

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 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. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of another term here, the letter “s”, 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 3.1](#), 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 the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name. The Respondent has not rebutted the 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 notes that the Complainant has not licensed, authorized, or otherwise permitted the Respondent to use its NORTHERN TRUST trademark or to register a domain name incorporating that trademark. Further, there is no evidence that the Respondent is in any way affiliated with, or otherwise has any relationship with, the Complainant or that the Respondent has been commonly known by the disputed domain name. Instead, based on the evidence, the disputed domain name resolves to a website promoting online casino, betting and gambling services under the name “[金剛 KingKong](#)” which includes login and registration functionality. Such use does not constitute a bona fide offering of goods or services nor does it constitute a legitimate noncommercial or fair use.

The Panel further notes that the disputed domain name consists of the Complainant’s NORTHERN TRUST trademark in its entirety, with the mere addition of the letter “s”. In the circumstances of the case, the Panel considers that the disputed domain name constitutes merely a typographical variation or “typosquatting” of the Complainant’s mark. The Panel finds that this causes a strong risk of implied affiliation with the Complainant, as the nature of the disputed domain name itself suggests that the disputed domain name is associated with the Complainant’s corporate group or business activities. The composition of the disputed domain name therefore falsely suggests sponsorship, endorsement, or authorization by the Complainant and does not support any finding of rights or legitimate interests on the part of the Respondent. See section 2.5.1 of the [WIPO Overview 3.1](#).

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.

In the present case, the Panel notes that the Respondent registered the disputed domain name many years after the Complainant had obtained registered trademark rights in its NORTHERN TRUST mark. The Panel further notes that previous UDRP panels have recognized the Complainant's NORTHERN TRUST trademark as a well-known mark in the banking and financial services sectors, see for instance *Northern Trust Corporation v. Whols Guard, Inc. / Eric Yeboah*, WIPO Case No. [D2018-1750](#). Given the composition of the disputed domain name, which incorporates the Complainant's NORTHERN TRUST trademark in its entirety with the mere addition of the letter "s", and the well-known nature of this mark, the Panel finds that the Respondent was, on the balance of probabilities, aware, or should have been aware, of the Complainant and its trademark rights when registering the disputed domain name. Additionally, a simple Internet search or a search of publicly available trademark records would have easily shown the Complainant's prior rights to the Respondent. In the circumstances of the case, the Panel finds that the disputed domain name was registered in bad faith.

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, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.1](#), section 3.2.1.

As to use of the disputed domain name in bad faith, the Panel accepts the Complainant's argument that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's NORTHERN TRUST trademark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website. Based on the evidence, the Respondent has used the disputed domain name, which differs from the Complainant's trademark only by the addition of the letter "s", to resolve to a commercial website promoting online casino, betting and gambling services under the name "金剛 KingKong", including login and registration functionality. In the Panel's view, the Respondent's use of a typosquatted version of the Complainant's trademark to divert Internet users to an unrelated commercial website falls directly within paragraph 4(b)(iv) of the Policy and constitutes direct evidence of the Respondent's use of the disputed domain name in bad faith.

Based on the above elements, 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 <northerntrusts.com> be transferred to the Complainant.

/Deanna Wong Wai Man/
Deanna Wong Wai Man
Sole Panelist
Date: July 8, 2026