ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
CNO Financial Group, Inc. v. Domain Admin, TotalDomain Privacy Ltd
Case No. D2026-2205

1. The Parties

The Complainant is CNO Financial Group, Inc., United States of America ("United States"), represented by Ice Miller, LLP, United States.

The Respondent is Domain Admin, TotalDomain Privacy Ltd, Panama.

2. The Domain Name and Registrar

The disputed domain name <mywashingtonnational.com> is registered with PDR Ltd. d/b/a PublicDomainRegistry.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 21, 2026. On May 22, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 23, 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 (Privacy Protected) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 28, 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 on June 1, 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 the Respondent 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 25, 2026.

The Center appointed Karen Fong as the sole panelist in this matter on July 6, 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

Incorporated in 1979, the Complainant is a financial services holding company based in Indiana, United States. The company was listed on the New York Stock Exchange in 1985. The Complainant markets its insurance products under three brands, one of them being WASHINGTON NATIONAL INSURANCE COMPANY and/or WASHINGTON NATIONAL. WASHINGTON NATIONAL serves the insurance needs of middle -income, pre-retired and retired Americans. In 2025, revenues under the brand totaled USD 4.49 billion.

The WASHINGTON NATIONAL brand is registered as a trade mark through the Complainant's subsidiary, CDOC, Inc. This includes the following registrations:

- United States Trade Mark Registration No. 4098162 for WASHINGTON NATIONAL & Device registered on February 14, 2012:

- United States Trade Mark Registration No. 4098163 for WASHINGTON NATIONAL & Device registered on February 14, 2012:

(Individually and collectively referred to as the "Trade Mark").

The Complainant's official website is found at the domain name <washingtonnational.com>.

The Respondent appears to be based in Panama, according to the registrant information provided by the Registrar. The disputed domain name was registered on July 25, 2017. The disputed domain name resolved to a pay-per-click ("PPC") webpage with commercial links to third party websites (the "Website"). As of May 4, 2026, the Website has been dormant.

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 the Trade Mark, that the Respondent has no rights or legitimate interests with respect to the disputed domain name, and that the disputed domain name was registered and is being used in bad faith.

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 trade mark and the disputed domain name. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.1), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. WIPO Overview 3.1, section 1.4.1.

The Panel finds the entirety of the Trade 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.

While the addition of the word "my" before the Trade Mark may bear on assessment of the second and third elements, the Panel finds the addition of the word does not prevent a finding of confusing similarity between the disputed domain name and the Trade Mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

Based on the available record, 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.

While 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 often impossible 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. 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 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.

Moreover, the nature of the disputed domain name is inherently misleading as it effectively impersonates or suggests sponsorship or endorsement by the Complainant particularly since it is almost identical to the Complainant's domain name. The sole difference between the Complainant's own domain name and the disputed domain name is the word "my" before "washingtonnational" in the disputed domain name. Based on the available record, 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 considers it evident that the Respondent was aware of the Trade Mark when registering the disputed domain name given the Trade Mark was registered prior to registration of the disputed domain name, the reputation of the Trade Mark and fact that the disputed domain name is almost identical to the Complainant's domain name. It is therefore implausible that the Respondent was unaware of the Complainant when it registered the disputed domain name.

In the WIPO Overview 3.1, section 3.2.2 states as follows:

"Noting the near instantaneous and global reach of the Internet and search engines, and particularly in circumstances where the complainant's mark is widely known (including in its sector) or highly specific and a respondent cannot credibly claim to have been unaware of the mark (particularly in the case of domainers), panels have been prepared to infer that the respondent knew, or have found that the respondent should have known, that its registration would be identical or confusingly similar to a complainant's mark. Further factors including the nature of the domain name, the chosen top-level domain, any use of the domain name, or any respondent pattern, may obviate a respondent's claim not to have been aware of the complainant's mark."

The fact that there is a clear absence of rights or legitimate interests coupled with the Respondent's choice of the disputed domain name incorporating the Trade Mark with only a trivial easily overlooked variation, without any explanation, is also a significant factor to consider (as stated in WIPO Overview 3.1, section 3.2.1). In the Panel's view, the disputed domain name falls squarely within the category of cases described therein. Accordingly, the Panel finds that the disputed domain name was registered in bad faith.

The Panel also finds that the disputed domain name is being used in bad faith.

The disputed domain name initially resolved to a PPC site which was set up for the commercial benefit of the Respondent. It is highly likely that Internet users typing the disputed domain name into their browser, or encountering it via a search engine would be expecting to reach a website operated by, or affiliated with the Complainant. The disputed domain name is therefore inherently misleading and likely to cause confusion among Internet users, particularly as it incorporates the Complainant's distinctive Trade Mark.

The Panel finds that the Respondent was seeking to exploit the reputation of the Trade Mark in order to mislead Internet users into visiting the Respondent's Website. On the basis of the record, the Panel concludes that the Respondent has intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the Website, within the meaning of paragraph 4(b)(iv) of the Policy.

The fact that the Website was inactive when the Complaint was filed does not affect the Panel's bad faith finding. Panels have found that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. WIPO Overview 3.1, section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Based on the available record, the Panel finds the third element of the Policy has been established.

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 <mywashingtonnational.com> be transferred to the Complainant.

/Karen Fong/
Karen Fong
Sole Panelist
Date: August 3, 2026