

ADMINISTRATIVE PANEL DECISION

Konica Minolta Business Solutions U.S.A., Inc. v. Domain Administrator,
Fundacion Privacy Services LTD
Case No. D2026-2857

1. The Parties

The Complainant is Konica Minolta Business Solutions U.S.A., Inc., United States of America ("United States"), represented internally.

The Respondent is Domain Administrator, Fundacion Privacy Services LTD, Panama.

2. The Domain Name and Registrar

The disputed domain name <allcoverd.com> (the "Disputed Domain Name") is registered with Media Elite Holdings Limited (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 30, 2026. On July 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On July 3, 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 (Domain Administrator / Fundacion Privacy Services LTD) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 6, 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 July 22, 2026 and filed an amendment to the Complaint on July 28, 2026.

The Center verified that the Complaint together with the amendment to the Complaint and 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 July 29, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 18, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 19, 2026.

The Center appointed Nick J. Gardner as the sole panelist in this matter on August 31, 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 relevant facts, which are not contested, can be summarised as follows.

The Complainant is a United States corporation and a subsidiary of Konica Minolta, Inc. of Japan, and is a long-established supplier of office imaging, printing, and information technology products and services in the United States. The Complainant states, and the Panel accepts, that it has made continuous, nationwide use of the ALL COVERED name and mark in connection with information technology consulting and managed services since at least 1997, when the All Covered business was founded; the Complainant acquired that business, All Covered, Inc., in December 2010, and has since traded, and continues to trade, under the ALL COVERED name through its All Covered division, offering managed information technology, cybersecurity, cloud, and related consulting services across North America under the domain name <allcovered.com>.

The Complainant is the owner of United States Trademark Registration No. 2,772,159 for the mark ALL COVERED, registered on the Principal Register on October 7, 2003 (application filed February 6, 2001), covering procurement, installation and maintenance, technical support, and consultation services relating to computers, computer software, and computer networks, in International Classes 035, 037 and 042, with a first use in commerce date of November 5, 2002 (the “ALL COVERED Trademark”). The registration has been renewed and remains in force.

The Disputed Domain Name was registered on January 9, 2024. The registrant is recorded in the Whois record as “Domain Administrator, Fundacion Privacy Services LTD” of Panama City, Panama, an entity offering privacy or proxy registration services; no further underlying registrant was disclosed by the Registrar.

The Complaint, supported by Annex 1 to the Complaint, asserts that the Disputed Domain Name is configured with a wildcard DNS or catch-all redirect such that subdomains of the Disputed Domain Name, including by way of example “sra.allcoverd.com”, redirect visitors to pornographic and adult-oriented content unconnected with the Complainant. Separately, the case file includes a website capture obtained by the Center in the course of its own case administration research on July 29, 2026, showing that the Disputed Domain Name and its “www” equivalent redirected at that time (by way of an HTTP 302 “Found” response) to a webpage at “ww1.allcoverd.com” displaying pay-per-click advertising content relating to insurance services, under headings including “Insurance Solutions” and “Get Comprehensive Insurance Coverage.” Neither webpage bears any reference to the Complainant, and neither is associated with any active business operated by the Respondent under a name corresponding to the Disputed Domain Name.

The Complaint states that the Complainant sent a cease-and-desist letter to the Respondent and to the Registrar on June 11, 2026, demanding immediate takedown of the Disputed Domain Name and its transfer to the Complainant (Annex 2 to the Complaint). No response to that letter was received, and the Respondent did not file a Response in this proceeding.

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 ALL COVERED Trademark, differing only by the omission of the letter “e” from “covered,” and that the addition of the “.com” suffix does not avoid confusing similarity.

The Complainant contends that the Respondent has no rights or legitimate interests in the Disputed Domain Name: the Respondent holds no relevant trademark rights, is not commonly known by the Disputed Domain Name, has not been authorised by the Complainant to use the Trademark, is not making any bona fide offering of goods or services, and instead uses the Disputed Domain Name, by means of a wildcard or catch-all DNS configuration, to redirect visitors, including via subdomains, to pornographic and adult-oriented content, which cannot constitute a legitimate interest.

The Complainant contends that the Disputed Domain Name was registered and is being used in bad faith, relying on: the fame and long-standing use of the ALL COVERED mark, such that the Respondent’s registration of a one-letter misspelling can only have been made with knowledge of, and intent to trade upon, the Complainant’s goodwill; the Respondent’s intentional attraction of Internet users for commercial gain by creating a likelihood of confusion with the Complainant’s mark; the Respondent’s use of a privacy or proxy registration service to conceal its identity; the wildcard DNS/catch-all configuration diverting misdirected traffic to pornographic content, said to constitute tarnishment; the typosquatting nature of the registration itself; and the Respondent’s failure to respond to the Complainant’s cease-and-desist letter of June 11, 2026. The Complainant requests that the Disputed Domain Name be transferred to the Complainant.

B. Respondent

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

6. Discussion and Findings

Preliminary Matter: Respondent Identity

The Complaint, and the amended Complaint, described the Respondent as comprising both (a) “Registrant of allcoverd.com, Media Elite Holdings Limited, S.A. (d/b/a RegisterMatrix.com) c/o Fundacion Privacy Services LTD” and (b) “Domain Administrator, Fundacion Privacy Services LTD.” Media Elite Holdings Limited, S.A. is, however, the Registrar of the Disputed Domain Name, and not the domain name holder; the Registrar’s own verification response to the Center disclosed a single registrant, recorded as “Domain Administrator, Fundacion Privacy Services LTD.” Under the Rules, paragraph 1, the “Respondent” is the holder of a domain-name registration against which a complaint is initiated, and a registrar is not a proper party to a UDRP proceeding in that capacity. The Center’s own notifications and its notification of default were addressed to the disclosed registrant. The Panel accordingly treats “Domain Administrator, Fundacion Privacy Services LTD” as the sole Respondent in this proceeding, and disregards the reference to the Registrar in the Complaint’s description of the Respondent. This clarification does not affect the substance of the Complaint or the Panel’s findings below.

Preliminary Matter: Respondent Default

Under the Rules, paragraph 2, the Center is required to employ reasonably available means calculated to achieve actual notice of the Complaint to the Respondent. The record shows that the Complaint, as notified, was sent to the Respondent by email at the addresses disclosed by the Registrar and at [...]@fundacionprivacy.com, and that Written Notice was also sent by courier to the Respondent’s address in Panama, as evidenced in the case file. No Response was received. In these circumstances the Panel is satisfied that the Center has complied with its obligation under the Rules, paragraph 2, to employ “reasonably available means calculated to achieve actual notice” to the Respondent.

Under the Rules, paragraph 5(f), if a respondent does not submit a response, in the absence of exceptional circumstances the Panel shall decide the dispute based upon the Complaint. The Panel finds no exceptional circumstances in this case. While the Respondent’s default does not automatically result in a decision in the

Complainant's favour, the Panel may draw appropriate inferences from it (see e.g. *Verner Panton Design v. Fontana di Luce Corp*, WIPO Case No. [D2012-1909](#)).

Substantive Matters

To succeed, in accordance with paragraph 4(a) of the Policy, the Complainant must satisfy the Panel that:

- (i) the Disputed Domain Name is identical with or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name;
- (iii) the Disputed Domain Name has been registered and is being used in bad faith.

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 Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has established rights in the ALL COVERED Trademark by virtue of United States Trademark Registration No. 2,772,159, registered October 7, 2003. See [WIPO Overview 3.1](#), section 1.2. It is well established that the applicable Top-Level Domain (here, ".com") is generally disregarded for the purposes of assessing identity or confusing similarity under the first element, being a technical requirement of registration. See [WIPO Overview 3.1](#), section 1.11.

Disregarding the ".com" suffix, the Disputed Domain Name consists of "allcoverd," which reproduces the Complainant's ALL COVERED Trademark (with the space between the two words removed, which does not avoid confusing similarity) save for the omission of the letter "e" from "covered." Panels have consistently held that a domain name which consists of a common, obvious, or intentional misspelling of a trademark, such as by the omission of a single letter, is confusingly similar to the relevant mark for the purposes of the first element, the domain name being readily recognisable as a variant of the mark. See [WIPO Overview 3.1](#), section 1.9. The overall impression created by the Disputed Domain Name is of a domain name corresponding to the ALL COVERED Trademark, differing only by the kind of inconspicuous typographical omission commonly relied upon by typosquatters to capture users who mistype an intended address, here the Complainant's own <allcovered.com> domain name.

Accordingly, the Panel finds that the Disputed Domain Name is confusingly similar to a trademark in which the Complainant has rights, and that the first condition of paragraph 4(a) of the Policy has been fulfilled.

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.

Paragraph 4(c) of the Policy sets out a non-exhaustive list of circumstances which, if established, may demonstrate a right or legitimate interest in a domain name: (i) use of, or demonstrable preparations to use, the domain name in connection with a bona fide offering of goods or services prior to any notice of the dispute; (ii) being commonly known by the domain name, even in the absence of trademark rights; or (iii) making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the mark at issue.

None of these circumstances is present here. The Complainant has not licensed or otherwise authorised the Respondent to use the ALL COVERED Trademark. There is no evidence that the Respondent is commonly known by the Disputed Domain Name or by any name corresponding to it; on the contrary, the registrant is recorded only as a privacy registration service. The un rebutted evidence is that the Disputed Domain Name is used, by means of a wildcard or catch-all DNS configuration, to redirect visitors, including via subdomains, to pornographic and adult-oriented content, and that it and its “www” equivalent have also redirected to a monetised pay-per-click advertising page unconnected with the Complainant. Neither use is a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy, nor a legitimate noncommercial or fair use under paragraph 4(c)(iii) of the Policy; redirection to pornographic content in particular cannot found a legitimate interest. See [WIPO Overview 3.1](#), section 2.5.

The Complainant has accordingly established a prima facie case that the Respondent lacks rights or legitimate interests in the Disputed Domain Name, and the burden of production shifts to the Respondent to come forward with evidence of such rights or interests. See [WIPO Overview 3.1](#), section 2.1; see also *Do The Hustle, LLC v. Tropic Web*, WIPO Case No. [D2000-0624](#); *Croatia Airlines d.d. v. Modern Empire Internet Ltd.*, WIPO Case No. [D2003-0455](#). The Respondent has filed no Response and has produced no such evidence.

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in the Disputed Domain Name, and that the second condition of paragraph 4(a) of the Policy has been fulfilled.

C. Registered and Used in Bad Faith

Several factors, taken together, satisfy the Panel that the Disputed Domain Name was registered, and is being used, in bad faith.

First, the Complainant’s ALL COVERED Trademark has been in continuous use in the United States since at least the early 2000s and has been the subject of a registration since 2003, and the Complainant has traded extensively under the ALL COVERED name since acquiring that business in December 2010, operating nationally under the domain name <allcovered.com>. Given the scale and duration of this use, and the fact that the Disputed Domain Name was registered only in January 2024, the Panel considers it improbable that the Respondent selected the Disputed Domain Name coincidentally or without knowledge of the Complainant’s rights. See [WIPO Overview 3.1](#), section 3.1 and section 3.6.

Second the Disputed Domain Name is not merely similar to the Complainant’s Trademark but is a one-letter typographical variant of the Complainant’s own <allcovered.com> domain name. This is a paradigmatic example of typosquatting, whereby a respondent registers a domain name differing from a trademark owner’s mark or domain name by a small, predictable typing error, in order to capture Internet users who mistype the intended address.

Third, the un rebutted evidence in the record, corroborated by the Center’s own case administration research, is that the Disputed Domain Name has been used to redirect Internet users, whether via a wildcard subdomain configuration to pornographic and adult-oriented content, or via the root and “www” addresses to monetised pay-per-click advertising, in each case unconnected with the Complainant. The Panel infers that the Respondent, or a third party acting through the Respondent’s use of the Disputed Domain Name, derives revenue from Internet users arriving at these destinations, including users who intended to reach the Complainant’s own website. It does not matter, for these purposes, that the content displayed does not directly compete with the Complainant’s services, nor does it matter if such content is generated automatically by a third-party advertising network; a respondent cannot disclaim responsibility for content

appearing on a website associated with its domain name, and neither the automated nor third-party origin of that content prevents a finding of bad faith. See [WIPO Overview 3.1](#), section 3.5. What matters is that traffic reaching these destinations is generated as a result of the Disputed Domain Name's confusing similarity to the Complainant's Trademark and domain name, from which the Respondent, or a third party, presumably derives commercial gain, and the redirection to pornographic content in particular is apt to tarnish the goodwill associated with the ALL COVERED Trademark.

Fourth, the Respondent registered the Disputed Domain Name through a privacy or proxy registration service, thereby concealing its identity, and the Registrar disclosed no further underlying registrant. While the use of a privacy service is not, without more, indicative of bad faith, it is a factor which, taken together with the matters set out above, reinforces the Panel's conclusion in the circumstances of this case. See [WIPO Overview 3.1](#), section 3.6.

Finally, the un rebutted evidence is that the Complainant sent the Respondent a cease-and-desist letter on June 11, 2026, demanding immediate takedown and transfer of the Disputed Domain Name, to which no response was received, and the Respondent has likewise failed to respond to the Complaint. The Panel draws an adverse inference from this consistent failure to engage.

Taking these matters together, the Panel is satisfied that the Disputed Domain Name was registered, and is being used, in bad faith. Accordingly, the Panel finds that the third condition of paragraph 4(a) of the Policy has been fulfilled.

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 <allcoverd.com> be transferred to the Complainant.

/Nick J. Gardner/

Nick J. Gardner

Sole Panelist

Date: September 14, 2026