ADMINISTRATIVE PANEL DECISION

Phoenix Group Management Services Limited v. Bryan Dickson
Case No. D2026-3069

1. The Parties

The Complainant is Phoenix Group Management Services Limited, United Kingdom, represented by Freeths LLP, United Kingdom.

The Respondent is Bryan Dickson, Canada.

2. The Domain Name and Registrar

The disputed domain name <standardlfb.com> (the "Domain Name") is registered with NameSilo, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 13, 2026. On July 13, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On July 13, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Registration private) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 14, 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 amendment to the Complaint on July 15, 2026.

The Center verified that the Complaint together with the amendment to the 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 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 5, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 26, 2026.

The Center appointed Mathias Lilleengen 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 to ensure compliance with the Rules, paragraph 7.

4. Factual Background

The Complainant is a large long-term savings and retirement business servicing 12 million customers under its pensions, savings and life insurance brands, including the STANDARD LIFE brand. The Complainant offers its services under the STANDARD LIFE brand in the UK, Ireland and EU.

The Complainant owns trademark registrations for STANDARD LIFE, including UK trade mark number UK00001272923 (registered on July 20, 1990). In addition, the Complainant owns domain names used to set up its websites at "www.standardlifeplc.com", "www.standardlife.co.uk" and "www.standardlife.ie".

The Domain Name was registered on October 3, 2024. The Complainant documents that the Domain Name had resolved to a website used to impersonate the Complainant. On the website the Respondent made use of the Complainant's trademark and offered a number of purported financial services. At the time of the Decision, the Domain Name resolved to an error page.

5. Parties' Contentions

A. Complainant

The Complainant provides evidence of trademark registrations and argues that the Domain Name is similar to the Complainant's trademark as the Domain Name reproduces the main part of the Complainant's trademark, with the addition of the letters LFB. The letters LF are likely to be interpreted as an abbreviation of the word LIFE, which is the second word present in the Complainant's trademark. The addition of the letter B is insignificant and does not distinguish the Domain Name from the Complainant's trademark.

The Complainant argues that the Respondent has no rights or legitimate interests in respect of the Domain Name. The Complainant has not authorized the Respondent to use its trademarks. The Complainant's trademark rights predate the Respondent's registration of the Domain Name.

The Complainant argues that internet users will be confused into believing that the Domain Name has association with the Complainant. The registration of the Domain Name therefore takes unfair advantage of the Complainant's rights. The Complainant submits that the Domain Name has been intentionally used to attract Internet users, for commercial gain, to the Respondent's website by creating a likelihood of confusion with the Complainant's trademark, as to the source, sponsorship, affiliation or endorsement of the website of the Respondent. Moreover, based on the MX record of the Domain Name, it appears that the Respondent intends to use the Domain Name for illegitimate email purposes.

B. Respondent

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

6. Discussion and Findings

A. Identical or Confusingly Similar

The test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trademark and the Domain Name. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 1.7.

The Complainant has established that it has rights in the trademark STANDARD LIFE. The Domain Name is incorporates the dominant part of the Complainant's trademark, with the addition of the letters LFB. The addition does not prevent a finding of confusing similarity between the Domain Name and the trademark. For the purpose of assessing the confusing similarity under paragraph 4(a)(i) of the Policy, the Panel ignores the TLD, see WIPO Overview 3.1, section 1.11.

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 (although the burden of proof always remains on the Complainant). If the respondent fails to come forward with relevant evidence, the complainant is deemed to have satisfied the second element. See 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 Domain Name. The Respondent has not rebutted the Complainant's showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the Domain Name. Based on the record, the Respondent is not affiliated or related to the Complainant. There is no evidence that the Respondent has registered the Domain Name as a trademark or acquired trademark rights. There is no evidence of the Respondent's use or preparations to use the Domain Name in connection with a bona fide offering of goods or services. On the contrary, the Respondent's use of the Domain Name is evidence of bad faith, see below. Furthermore, the Panel finds that the nature of the Domain Name carries a risk of implied affiliation and its use cannot be considered fair as it falsely suggests affiliation. See WIPO Overview 3.1, section 2.5.1.

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.

The composition and use of the Domain Name make it clear that the Respondent was aware of the Complainant when the Respondent registered the Domain Name. Based on the available record, it appears that the Respondent intended to create a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement. The Domain Name was used to host an impersonating website. It constitutes bad faith use. See WIPO Overview 3.1, section 3.4. The current non-use of the Domain Name does not prevent a finding of bad faith.

For the reasons set out above, the Panel concludes that the Domain Name was registered and is being used in bad faith, within the meaning of paragraph 4(a)(iii) of the Policy. 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 the Domain Name <standardlfb.com> transferred to the Complainant.

/Mathias Lilleengen/
Mathias Lilleengen
Sole Panelist
Date: September 2, 2026