

ADMINISTRATIVE PANEL DECISION

American Airlines, Inc. v. Shu Lin
Case No. D2026-3562

1. The Parties

The Complainant is American Airlines, Inc., United States of America (“United States”), represented by Greenberg Traurig, LLP, United States.

The Respondent is Shu Lin, China.

2. The Domain Name and Registrar

The disputed domain name <americanairlinesfederalcreditunion.com> is registered with Above.com Pty Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 11, 2026. On August 12, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 14, 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 (Not provided) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 17, 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 August 17, 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 August 21, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 10, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 14, 2026.

The Center appointed Áron László as the sole panelist in this matter on September 24, 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 a Delaware corporation based in Fort Worth, Texas, United States. It is an air carrier which, with its affiliates, serves over 350 destinations in more than fifty countries, with nearly 7,000 daily flights.

The Complainant operates its main website at “www.aa.com”. The domain name <americanairlines.com> redirects to that website. The Complainant created both websites in 1998.

The Complainant’s group also includes the American Airlines Credit Union, a not-for-profit, full-service financial cooperative. It was founded in 1936, is based in Fort Worth, Texas, United States, and has 46 branches in the United States. It serves current and retired employees of the Complainant, their family members, and people who work in the air transportation industry. Its website is at “www.aacreditunion.org”, which the Complainant created in 1999.

The Complainant owns a large portfolio of trademark registrations for AMERICAN AIRLINES and related marks in many jurisdictions, including the following:

- United States Trademark Registration No. 514,294 for AMERICAN AIRLINES, registered on August 23, 1949;
- United States Trademark Registration No. 2,728,688 for AMERICAN AIRLINES FEDERAL CREDIT UNION, registered on June 24, 2003; and
- Chinese Trademark Registration No. 779736 for AMERICAN AIRLINES, registered on March 21, 1995.

The disputed domain name was registered on March 22, 2009. The registrar has disclosed that the Respondent is an individual residing in Dalian, China.

The disputed domain name resolves to a pay-per-click (“PPC”) page. At the time the complaint was filed, the page contained links to third-party websites, such as “10 Best Credit Unions”, “Activate your Credit Card” and “Local Credit Unions”. The disputed domain name also has active MX (mail exchange) records.

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.

With regard to the first element, the Complainant contends that the disputed domain name incorporates its AMERICAN AIRLINES FEDERAL CREDIT UNION mark in full. It says the disputed domain name also contains its AMERICAN AIRLINES mark, differing only by the term “federal credit union”, which directly describes the Complainant’s credit union services. The Complainant further contends that the disputed domain name entirely incorporates its AMERICAN AIRLINES CREDIT UNION mark, with only the descriptive term “federal” added, together with the generic Top-Level Domain “.com”. It argues that

the added words do not distinguish the disputed domain name from its marks. Instead, they increase the likelihood of confusion because of their direct link to the Complainant's credit union services. The Complainant also notes that its marks have been recognized by earlier panels as well known worldwide.

With regard to the second element, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain name. It says the Respondent is not commonly known by the disputed domain name, has not used or prepared to use it for a bona fide offering of goods or services, and has not been authorized, licensed or otherwise permitted by the Complainant to register or use it. The Complainant asserts that the disputed domain name resolves to a PPC page with links such as "10 Best Credit Unions", "Airline Credit Card Offers" and "Local Credit Unions", which redirect visitors to third-party websites. It argues that this use is neither a bona fide offering nor a legitimate noncommercial or fair use. The Complainant adds that the Whois data does not suggest the Respondent is known by the disputed domain name. It also states that, to its knowledge, the Respondent holds no trademark applications or registrations for any mark that includes the Complainant's marks.

With regard to the third element, the Complainant contends that the Respondent registered the disputed domain name long after the Complainant established its rights, knew of the Complainant's marks, and uses the disputed domain name to divert Internet traffic for PPC revenue. The Complainant argues that this is bad faith under paragraphs 4(b)(iii) and 4(b)(iv) of the Policy. It submits that registering a domain name containing its well-known AMERICAN and AMERICAN AIRLINES marks is enough, on its own, to support an inference of bad faith, and relies on earlier panel decisions in its favor. The Complainant further argues that Active MX records create a risk that the disputed domain name may be used for phishing or spam. The disputed domain name is so obviously connected with the Complainant that its use by an unrelated party suggests opportunistic bad faith. The Respondent has been found in earlier UDRP decisions to have registered and used domain names in bad faith targeting third-party marks. The Complainant says this is a pattern of conduct under paragraph 4(b)(ii) of the Policy.

The Complainant requests that the disputed domain name be transferred to it.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to "decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable".

Paragraph 4(a) of the Policy requires that a complainant must prove each of the following three elements to obtain an order that a domain name should be cancelled or transferred:

- i. the domain name registered by the respondent is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
- ii. the respondent has no rights or legitimate interests in respect of the domain name; and
- iii. the domain name has been registered and is being used in bad faith.

In view of the Respondent's failure to submit a Response, the Panel shall decide this dispute on the basis of the Complainant's undisputed representations pursuant to paragraphs 5(f), 14(a) and 15(a) of the Rules and draw such inferences as it considers appropriate pursuant to paragraph 14(b) of the Rules.

The Panel is entitled to accept all reasonable allegations set forth in a complaint. However, the Panel may deny relief where a complaint contains mere conclusory or unsubstantiated arguments. WIPO Overview of WIPO Panel Views on Select UDRP Questions ([“WIPO Overview 3.1”](#)), section 4.3.

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 identical to the mark AMERICAN AIRLINES FEDERAL CREDIT UNION for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

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 nature of the disputed domain name, being identical to the Complainant's mark, carries a high risk of implied affiliation. [WIPO Overview 3.1](#), section 2.5.1.

Panels have found that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant's mark or otherwise mislead Internet users. [WIPO Overview 3.1](#), section 2.9. Here, the PPC website targets the Complainant's activity.

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.

Given the worldwide fame and recognition of the AMERICAN AIRLINES trademark, which has been in use since the 1930s and registered since 1949, it is inconceivable that the Respondent was unaware of the existence of the Complainant and its trademark at the time of registration of the disputed domain name. This leads the Panel to the conclusion that the Respondent registered the disputed domain name and has used it in bad faith.

The disputed domain name relates to a website showing PPC links, which target the Complainant. This lets the Panel conclude that the Respondent has registered the disputed domain name to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark. [WIPO Overview 3.1](#), section 3.1.4.

Moreover, the Respondent has been found in earlier UDRP decisions to have registered and used domain names in bad faith targeting third-party marks (most recent decisions being *Government Employees Insurance Company v. Shu Lin*, WIPO Case No. [D2024-0799](#), and *Bank of New York Mellon v. Shu Lin*, WIPO Case No. [D2023-1539](#)) preceded by several other similar cases. The Panel finds that the Respondent has engaged in a pattern of such conduct under paragraph 4(b)(ii) of the Policy.

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 <americanairlinesfederalcreditunion.com> be transferred to the Complainant.

/Áron László/

Áron László

Sole Panelist

Date: September 30, 2026