

## **ADMINISTRATIVE PANEL DECISION**

Swiss Life AG, Swiss Life Intellectual Property Management AG v. Julien Chambon

Case No. D2026-4010

### **1. The Parties**

The Complainants are Swiss Life AG, Switzerland, and Swiss Life Intellectual Property Management AG, Switzerland, represented by FMP Fuhrer Marbach & Partners, Switzerland.

The Respondent is Julien Chambon, France.

### **2. The Domain Name and Registrar**

The disputed domain name <swisslife-ameurope.com> is registered with Dynadot Inc (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 7, 2026. On September 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 8, 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 (Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainants on September 8, 2026, providing the registrant and contact information disclosed by the Registrar and inviting the Complainants to submit an amendment to the Complaint. The Complainants filed an amendment to the Complaint on September 8, 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 September 9, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 29, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 30, 2026.

The Center appointed Manuel Moreno-Torres as the sole panelist in this matter on September 30, 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 Complainants are both part of the Swiss Life Group, founded in 1857 and Switzerland's largest life insurance company and one of Europe's leading comprehensive life and pensions and financial solutions providers (together "the Complainant").

The Complainant holds a portfolio for SWISS LIFE trademark in different jurisdictions. By way of example:

- Swiss Federal Institute of Intellectual Property SWISS LIFE, registration No. 491528, registered on November 15, 2001; and
- European Union Intellectual Property Office SWISS LIFE, registration No. 003438413, registered on October 20, 2006.

According to the evidence, SWISS LIFE is to be considered a well-known trademark.

The Complainant also holds a portfolio of domain names in connection to SWISS LIFE such as <swisslife.ch>, <swisslife.fr>, and <swisslife.com>.

The disputed domain name was registered on August 10, 2026, and does not resolve to an active website. However, according to the evidence provided by the Complainant, the disputed domain name has been used as an email address to send at least two fraudulent messages. And by doing this the Respondent appears to have used the name and photo of a former employee of the Complainant as well as the Complainant's logo to send these emails purporting to be the Complainant.

#### **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 identical to the Complainant's SWISS LIFE trademark. The additional suffix "am" refers to "asset management" and "europe" refers to the European branch of the Complainant. Such composition creates confusion among consumer who expect to be dealing with the Complainant or one of its affiliates.

Further, the Complainant contends that the Respondent misuses the SWISS LIFE logo and infringes the Complainant's company name rights, which constitutes an act of unfair competition.

As far as the Complainant is aware, the Respondent has no rights or legitimate interests in the disputed domain name, and the Complainant has neither authorized nor given permission to use the SWISS LIFE trademark as a domain name.

The Complainant alleges that the Respondent has illegally attempted to capitalize on and take advantage of the SWISS LIFE trademark to carry out fraudulent activities.

The Complainant also notes that the use of a domain name for an illegal activity is a clear indication of registration and use in bad faith.

In the amendment to the Complaint, the Complainant asserts that the Respondent's email address, as confirmed by the Registrar, is associated with a domain name which, according to the results of a detailed report published by a French platform Warning Trading on December 23, 2025, hosts a fraudulent website

## **B. Respondent**

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

## **6. Discussion and Findings**

Under paragraph 4(a) of the Policy, to succeed the Complainant must satisfy the Panel that:

- (i) the disputed domain name is identical 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; and
- (iii) the disputed domain name was 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 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 Panel finds the mark is recognizable 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 other terms, here, "am" which, the Complainant contends, stands for "asset management" and "europe", may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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.

It is also well established that the generic Top-Level Domain ("gTLD"), in this case ".com", is typically disregarded in the first element requirement. [WIPO Overview 3.1](#), section 1.11.1.

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.

Panels have held that the use of a domain name for here, phishing/identity theft, passing off, or other types of fraud, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1. Indeed, the use of the Complainant's trademark and the reference to a former employee of the Complainant in the emails sent by the Respondent fall within these circumstances.

In any case, the Panel notes that none of the circumstances described in paragraph 4(c) of the Policy can be inferred from the case file.

The Panel finds the second element of the Policy has been established.

### **C. Registered and Used 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.

The Panel finds that the Respondent knew or should have known about the Complainant and its trademarks. The well-known nature and reputation of the SWISS LIFE mark, the composition of the disputed domain name, and the Respondent's emails purporting to be the Complainant are evidence of trademark targeting. Therefore, the Respondent registered the disputed domain name in bad faith.

As noted in the previous paragraph, the disputed domain name has been involved in a phishing/identity theft and passing off scam. Such use of the disputed domain name constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds that the Respondent's registration and use of the disputed domain name constitute bad faith under 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 <swisslife-ameurope.com> be transferred to the Complainant.

*/Manuel Moreno-Torres/*

**Manuel Moreno-Torres**

Sole Panelist

Date: October 1, 2026