

ADMINISTRATIVE PANEL DECISION

Government Employees Insurance Company v. Paweł Utr,
WAYF DIGITAL sp. z o.o.
Case No. DAI2025-0056

1. The Parties

1.1 The Complainant is Government Employees Insurance Company, United States of America ("United States"), represented by Sterne, Kessler, Goldstein & Fox P.L.L.C., United States.

1.2 The Respondent is Paweł Utr, WAYF DIGITAL sp. z o.o., Poland, represented by The GigaLaw Firm, Douglas M. Isenberg, Attorney at Law, LLC, United States.

2. The Domain Name and Registrar

2.1 The disputed domain name <geico.ai> (the "Domain Name") is registered with Spaceship, Inc. (the "Registrar").

3. Procedural History

3.1 The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 31, 2025. At that time, publicly available Whois details did not identify the underlying registrant of the Domain Name.

3.2 On November 3, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On November 4, 2025, the Registrar transmitted by email to the Center its verification response disclosing the underlying registrant and contact information for the Domain Name. The Center sent an email communication to the Complainant on November 4, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint.

3.3 The Complainant filed an amended Complaint on November 10, 2025. 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").

3.4 In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on November 11, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 1, 2025. The Respondent requested the automatic extension to file the Response, which was granted on November 26, 2025.

3.5 The Response was filed with the Center on December 5, 2025.

3.6 The Complainant filed a Supplemental submission in these proceedings on December 10, 2025. The Respondent filed a Supplemental submission in response on December 12, 2025. The admissibility of these submissions is dealt with later on in this decision.

3.7 The Center appointed Matthew S. Harris, Rachel Tan, and Assen Alexiev as panelists in this matter on January 7, 2026. The Panel finds that it was properly constituted. Each member of 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

4.1 The Complainant is a company incorporated in Nebraska, United States, with its principal place of business in Chevy Chase, Maryland. It was founded in 1936.

4.2 The Complainant is the third largest auto insurer in the United States, insuring more than 28 million motor vehicles, and employing over 28,000 individuals. It conducts its business under the GEICO mark, which comprises and acronym for its full name. It has operated a website from the domain name <geico.com> to promote its business activities since 1995.

4.3 The Complainant is the owner of various registered trade marks in various jurisdictions that comprise or incorporate the term "Geico". They include:

(i) United States registered trade mark no. 763274 for GEICO as a standard character mark with a registration date of January 14, 1964 in classes 35 and 36; and

(ii) International trade mark no. 1178718 for GEICO as a word mark with a registration date of September 4, 2013 in class 36, designating the European Union.

4.4 The Respondent is a software consultancy and product development company that was founded in 2019 and is based in Warsaw, Poland. It has for a number of years operated a website from the domain name <waydigital.com> promoting its business.

4.5 The Respondent registered the Domain Name on May 7, 2025. It does not appear to have been used for an active website since registration.

5. Parties' Contentions

A. Complaint

5.1 The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name.

5.2 The Complainant provided details in relation to its business in the United States and its various United States registered trade marks. It contends that through investment in its brand and advertising "GEICO has become one of the most recognizable brands in the United States".

5.3 The Complainant also refers to various previous proceedings under the Policy to which it was a party. It claims that in *Government Employees Insurance Company v. Stephen Hadhazi*, WIPO Case No. [D2021-3508](#) it was described as an “internationally known insurance provider” and that in “*Government Employees Insurance Company (“GEICO”) v. Contact Privacy Inc. Customer 7151571251 / kendrick Whiteman, geico*, WIPO Case No. [D2022-3173](#) its GEICO Mark was described as “world famous”.

5.4 The Complainant contends that it is inconceivable that the Respondent was not aware of Complainant’s mark when it registered the Domain Name in 2025. Further the Complainant contends that the Respondent’s use of a privacy service in this case “evidences a bad faith intent to evade Complainant’s enforcement of its trademark rights”.

B. Respondent

5.5 The Respondent in its response describes its business and contends that Paweł Utr, whose details also formed part of the contact details provided by the Registrar, is a 50% owner of the Respondent. Mr. Utr is described as possessing a bachelor of arts degree from the University of Wrocław in “linguistics, literatures and neo-Latin languages”.

5.6 The Respondent claims that one of its clients is “Rye, which provides agentic commerce infrastructure for native in-app purchases” and “offers its customers a product that allows them to create corporate gifting platforms”.

5.7 The Respondent claims that as a result of its experience including its work for Rye it has:

“been working since 2022 on the creation of a gifting platform powered by artificial intelligence (“AI”) that would include ChatGPT-style AI chat for personalized gift recommendations”.

5.8 It further contends that the Domain Name is one of a number of domain names it has registered in connection with this platform. It claims that the partial source of inspiration for the choice of the term “Geico” was that one of its competitors was named “Work & Co”, and that the term “geico” involves a combination of the Chinese word 紿, (pronounced “Gěi”) which is said to mean “give” in English, and the term “co” which is a common abbreviation for the term “company”. Mr. Utr is said to be familiar with Chinese as a result of work for clients and because his “life partner” speaks Chinese.

5.9 The Respondent contends that prior to receiving this complaint the Respondent had never heard of and had no knowledge of the Complainant and its mark, and that to the best of the Respondent’s knowledge “it has no presence in Poland and owns no registrations for the GEICO trade[]mark in Poland”.

5.10 In support of these contentions the Respondent exhibited to its Response various material including (a) screenshots of pages from the Complainant’s website identifying overseas locations in Germany and Belgium, Italy, Spain and the United Kingdom, and (b) a Declaration from Mr. Utr confirming a number of the statements made in the Response.

5.11 Further, exhibited to Mr. Utr’s declaration are (i) screenshots from the Respondent’s website and LinkedIn page as at 25 November 2025, (ii) evidence in support of the contention that “Gěi” means “give” in Chinese and (iii) undated mockups of an English language website which the Respondent claims it “began creating in December 2024 for use in connection with the [Domain Name]” and which contains the following logo:



C. Supplemental Submissions

5.12 Both parties filed supplemental submissions in these proceedings that were not called for by the Panel. The Complainant's supplemental submission purported to correct alleged inaccuracies in the Response including the statement that the Complainant did not have trade mark rights in Poland. In this respect it referred to its trade mark no. 1178718, registered for the European Union. The Respondent in its response objected to the admission of the Complainant's submissions on the alleged grounds that the Complainant failed to explain why this information could not have been included in the Complaint.

5.13 The Panel is prepared to allow the admission of the Complainant's evidence so far as the existence of its trade mark registered for the European Union is concerned.

5.14 The Panel notes the Respondent's contention that the Complainant has not explained why it could not have referred to this mark in its Complaint, and ordinarily that would preclude its inclusion in a supplemental submission. It may not have known the location of the Respondent at the time that the Complaint was filed, but this would have been clear once it was provided with the contact information provided by the Registrar, and the Complainant was given an opportunity to amend its Complaint. The Complainant subsequently and for whatever reason decided in its Amended Complaint not to refer to this mark.

5.15 Nevertheless, the Respondent in its Response expressly and positively contended that the Complainant "had no presence or relevant trademark rights in Poland, where Respondent is located" [emphasis added] and filed evidence that purportedly showed that the only registered trade mark rights the Complainant had for the term "Geico" were in the United States and the United Kingdom. So far as the issue of rights is concerned, this statement was clearly untrue and/or misleading given the existence of the Complainant's trade mark registered for the European Union, which *extends* inter alia to Poland. In these circumstances, the Panel considers that Complainant was entitled to file evidence to correct the record in this respect.

6. Discussion and Findings

A. Identical or Confusingly Similar

6.1 It is generally 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 a complainant's trademark and the disputed domain name and it is usually sufficient for a finding of confusing similarity that the mark is recognisable in the domain name; see in this respect WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

6.2 The Panel is satisfied that the Complainant owns registered trade mark rights in the United States and in the European Union in respect of the term "Geico" that constitute rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. Further, the Domain Name comprises that term combined with the <.ai> ccTLD. It follows that the Panel is satisfied that the Domain Name is at least confusingly similar with the Complainant's mark and that the Complainant has established the first element of the Policy.

B. Rights or Legitimate Interests and Registered and Used in Bad Faith

6.3 It is usual for panels under the Policy to consider the issues of rights or legitimate interests and registration and use in bad faith in turn. However, in this case it is more convenient to consider those issues together. [WIPO Overview 3.0](#), section 2.15.

6.4 The reason for this is that the Complainant contends that the Domain Name has been registered and held with knowledge of its business and rights and in order to take unfair advantage of the same. In contrast the Respondent contends that not only was it unaware of the Complainant at the time of registration, but

chose the Domain Name for a project unconnected with the Complainant and related to a reading of the Domain Name as a combination of Chinese and English terms. If the Respondent's contentions are correct, at the very least the Domain Name has not been registered or used in bad faith. If the Complainant's contentions are correct, the Respondent will have no relevant right or legitimate interest in the Domain Name and the Domain Name will have been both registered and used in bad faith.

6.5 The way in which the Complaint has been prepared is self-limiting. The Complaint almost exclusively refers to the Complainant's marks and reputation in the United States, and no real attempt is made to explain let alone provide evidence of the extent of its business and the reputation of its marks elsewhere in the world. There are references to previous relatively recent UDRP decisions where panels appeared to have accepted that the Complainant's mark was "internationally known" and "world famous". However, these decisions do not explain the evidential basis for those statements and it is also unclear whether this was determinative of the decision in each of those cases. Further, as a matter of principle if a complainant intends to advance that sort of contention, it must properly set out the basis for this, so that a respondent is able to respond to the same. The mere reference to the conclusionary factual remarks of a third party, even if they are the remarks of another UDRP panel, is insufficient.

6.6 The Panel recognises that the Complainant may not have been aware of the identity and location of the Respondent when the Complaint was filed, but this was disclosed to the Complainant subsequent to filing and the Complainant had an opportunity to amend its Complaint to take this into account. It did not do so and did not even at that stage identify its European trade mark. Further, although there ultimately was some evidence before the Panel that the Complainant had to some degree a European presence, that was only provided in its Supplemental Submission, the exact nature of that presence is still not fully clear, and in any event it appears that this presence may not extend to Poland where the Respondent is located.

6.7 Notwithstanding this, the Complainant's business is a very significant one and it has for a very considerable period of time promoted that business from the <geico.com> domain name. The Respondent states that prior to receiving the Complaint, it had never heard of and had no knowledge of the Complainant and its mark. It is however inherently implausible that a person registering the Domain Name, and particularly one that describes itself as a software consultancy and product development company working for international clients, would not at the very least make a simple online search for the term "Geico" at the time that the Domain Name was chosen and find out that the Complainant's business exists (see also in this respect the comments of the impact of the borderless nature of the Internet to the question of knowledge in section 3.2.2 of the WIPO Overview) and moreover that it held the corresponding ".com" domain name. Further, given the fact that the term "Geico" has no obvious non-trade mark meaning that might explain the choice of that term, then in the absence of a compelling contrary explanation supported by evidence, in the view of the Panel it is more likely than not that the reason why the Domain Name was chosen was because of its association with the Complainant's mark and business and to take unfair advantage of the same.

6.8 The Respondent's explanation for why the term "Geico" was chosen is that it comprises a Chinese term for "Give" combined with the English abbreviation "co". The difficulty with this is that it is inherently odd that a Polish software entity would choose such a combination, the explanation for the that combination is problematic and supported by very little evidence, and parts of that evidence seems to undermine the Respondent's own case.

6.9 The Respondent has provided a declaration from an individual who is involved in the Respondent's business, but in places it merely repeats the same language used in the Response, and often raises more questions than it answers.

6.10 For example, reference is made to that individual's qualification in linguistics and neo-Latin languages. But even if this is correct (and no further evidence of this is provided), why that is relevant to a choice of a combination of a Chinese (which is obviously not a neo-Latin language) word and an English abbreviation is far from obvious.

6.11 It is also claimed that the Respondent had undertaken work for its client Rye, which provides a gifting platform. However, again why this is significant is not really explained, particularly when according to pages

from the Respondent's own website that are appended to the Declaration, the work done for Rye did not relate to gifting, but instead to assist Rye in "becoming the checkout engine powering the agentic commerce revolution".

6.12 Similarly, it is claimed that the Domain Name is one of a number of different domain names registered in respect of the Respondent's claimed project, but these other domain names are not identified and there is no attempt to explain the relevance of this contention.

6.13 Further, the declaration claims that the Respondent "consulted with a[n unnamed] Polish influencer living in China for cultural consideration about the 'geico' name". If that were so, the Panel would expect there to be at least some sort of record of that consultation, but none is provided.

6.14 Last but not least, the Domain Name was registered in May 2025, and therefore one would expect there at least to be some evidence of preparations to use the Domain Name for the claimed purpose. This has been provided by the Respondent in the form of a website mock-up. This material is undated, but the Panel accepts that the mock-up does contain a logo that includes the text "Gei&Co". However, this mock-up does not contain any content linked to gifting. Instead, the content appears to relate to the provision of "personalized advice on supplementation and wellness issues" and the offering for sale of various dietary supplements. In other words, this material does not constitute demonstrable preparations to use the Domain Name in the bona fide way that the Respondent claims it intends to use it. It is also material that positively undermines, rather than supports, the Respondent's contentions as to why the Domain Name was registered.

6.15 Under the Policy, a Panel must reach a conclusion as to whether the Complainant has shown each of the elements of the Policy on the "balance of probabilities" or on the "preponderance of the evidence". In this case and notwithstanding the Panel's reservations about the way in which the Complaint is formulated, the Panel nevertheless concludes on the material before it that the Complainant has demonstrated on the balance of probabilities that the Domain Name was registered and is being held to take unfair advantage of the Complainant's GEICO mark. It follows that the Complainant has similarly demonstrated that the Respondent has no right or legitimate interest in the Domain Name and that the Domain Name was registered and is being held in bad faith.

7. Decision

7.1 For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the Domain Name <geico.ai> be transferred to the Complainant.

/Matthew Harris/
Matthew Harris
Presiding Panelist

/Rachel Tan/
Rachel Tan
Panelist

/Assen Alexiev/
Assen Alexiev
Panelist
Date: January 19, 2026