

ADMINISTRATIVE PANEL DECISION

UnitedHealth Group Incorporated v. Domain Administrator,
Fundacion Privacy Services LTD
Case No. D2025-2411

1. The Parties

The Complainant is UnitedHealth Group Incorporated, United States of America (“United States”), represented by Seyfarth Shaw LLP, United States.

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

2. The Domain Name and Registrar

The disputed domain name <myhuc.com> 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 18, 2025. On June 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 19, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details.

The Center verified that 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 June 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 13, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 14, 2025.

The Center appointed Wilson Pinheiro Jabur as the sole panelist in this matter on July 16, 2025. 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 provider of health and benefits related products and services, offering health insurance plans, member services, and management plans under the MYUHC.COM and UHC marks, among others, having generated, in 2024, more than USD 400 billion in revenue (Annexes 3, 4 and 12 to the Complaint).

The Complainant has been ranked fourth on the Fortune 500 list, eighth on the Fortune Global 500 list, first on the Fortune Sector Leaders: Health Care, and for the sixteenth consecutive year, first in the insurance and managed care sector on Fortune's 2025 "World's Most Admired Companies" list. (Annexes 5-8 to the Complaint).

The Complainant registered on July 4, 1999, the <myuhc.com> domain name to serve as an online portal for its consumers to securely access their health care and benefit information online, as well as the Complainant is the owner of the United States Trademark Registration No. 2,645,558 for the word mark MYUHC.COM, registered on November 5, 2002, in classes 35, 36, 38, and 42.

The disputed domain name was registered on August 14, 2007, and presently dynamically redirects Internet users to various websites including those apparently associated with distribution of malware (Annex 15 to the Complaint).

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 asserts to have been providing, for decades, a diverse range of health-related products and services to both individual consumers and benefit sponsors around the world under the trademarks MYUHC.COM, UHG, UNITEDHEALTHCARE, and UNITEDHEALTHCARE & Design, among others, which have become valuable source identifiers and carry significant goodwill.

In the United States, the Complainant asserts to contract directly with more than 1.7 million physicians and care professionals, and 7,000 hospitals and other care facilities nationwide to provide goods and services, serving more than 45 million people globally in providing health insurance and related products and services delivered in connection with the Complainant's trademarks (Annexes 3 and 4 to the Complaint), thus having the Complainant's trademarks become extremely well-known to a wide swath of consumers across the globe and representing a strong source-identifier for the Complainant's health insurance benefits and related services.

The Complainant states to have learned about the Respondent's use of the disputed domain name from a customer who was infected with malicious software after visiting the website located at the disputed domain name.

The Complainant submits that the disputed domain name consists of a common, obvious, or intentional misspelling of the Complainant's trademark and is therefore confusingly similar to the relevant mark for purposes of the first element.

Regarding the absence of the Respondent's rights or legitimate interests, the Complainant argues that:

- i. the Complainant has not authorized the Respondent to use its trademark, nor does it have any type of business relationship with the Respondent;
- ii. the Respondent has not been commonly known by the disputed domain name;

iii. the Respondent's illegal activity distributing malicious software (e.g., malware) or, at other occasions, the redirection of the disputed domain name to websites offering competing services to the Complainant, can never confer rights or legitimate interests on Respondent.

Lastly, the Complainant submits that the disputed domain name consists of a blatant, egregious typosquatting, what is *per se* bad faith; having the Respondent chosen to register the disputed domain name under the cloak of a privacy service further showing that the Respondent acted in bad faith when registering the disputed domain name. Furthermore, the Respondent's use of typosquatting to disseminate malicious software is clear bad faith use under the Policy.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy sets forth three requirements, which have to be met for this Panel to order the transfer of the disputed domain name to the Complainant:

- (i) the disputed domain name 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 disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

The Complainants must prove in this administrative proceeding that each of the aforesaid three elements is present in order to obtain the transfer of the disputed domain name.

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 Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), 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 3.0](#), sections 1.7 and 1.9.

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 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 3.0](#), section 2.1.

In that sense, and according to the evidence submitted, the Complainant has made a prima facie case against the Respondent who has not been commonly known by the disputed domain name and is neither authorized, licensed, or been allowed to use the Complainant's trademark, whether in the disputed domain name, or in any other way.

Also, the lack of evidence as to any trademarks registered by the Respondent corresponding to the disputed domain name, corroborates the indication of an absence of rights or legitimate interests in the disputed domain name.

Furthermore, according to the evidence submitted by the Complainant, the use of the disputed domain name in connection with third party websites that allegedly spread malware, in conjunction with, at other times, the redirection of the disputed domain name to competitors of the Complainant does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use of the disputed domain name in these circumstances.

Under these circumstances and absent evidence to the contrary, the Panel finds that the Respondent does not have rights or legitimate interests with respect to the disputed domain name.

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 3.0](#), section 3.2.1.

This case presents the following circumstances which indicate under the balance of probabilities bad faith registration and use of the disputed domain name:

- a) the composition of the disputed domain name consisting of a clear misspelling of the Complainant's well-known trademark (previous UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. See [WIPO Overview 3.0](#), section 3.1.4;
- b) the Respondent has provided no evidence whatsoever of any actual or contemplated good faith use by it of the disputed domain name;
- c) the indication of what appears to be false contact details by the Respondent, not having the Center been able to deliver the Written Notice to it;
- d) the Respondent's choice to retain a privacy protection service in an attempt to conceal its identity;
- e) the Respondent has used the disputed domain name in connection with various third-party websites allegedly spreading malware; and
- f) the Respondent has also been a named respondent in many other UDRP cases in which the Respondent was found in bad faith by registering domain names incorporating third parties' trademarks.

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 <myhuc.com> be transferred to the Complainant.

/Wilson Pinheiro Jabur/

Wilson Pinheiro Jabur

Sole Panelist

Date: July 24, 2025