

## **ADMINISTRATIVE PANEL DECISION**

Moelis & Company v. xianfeng hu  
Case No. D2025-4065

### **1. The Parties**

The Complainant is Moelis & Company, United States of America (“United States”), represented by Soteria LLC, United States.

The Respondent is xianfeng hu, China.

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

The disputed domain names <moelisai.com> and <moelisglobal.com> are registered with Dynadot Inc (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 4, 2025. On October 6, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On October 12, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 14, 2025, 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 October 16, 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”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on October 22, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 11, 2025. The Response was filed with the Center on November 10, 2025. The Center sent Commencement of Panel Appointment Process to the Parties on November 13, 2025.

The Center appointed Deanna Wong Wai Man as the sole panelist in this matter on November 24, 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 an investment bank based in the United States, and provides financial advisory services to corporations, governments, and financial sponsors. The Complainant engages in direct dialogue with a wide range of institutional investors, including private equity, venture and growth capital, mutual funds, hedge funds, alternative asset managers, bank and non-bank lenders, sovereign wealth, insurance, pension funds and family offices. The Complainant states that it is known mainly as “Moelis”, and its main website is located at the domain name <moelis.com>.

The Complainant provides evidence that it owns a trademark portfolio for the trademarks MOELIS and MOELIS & COMPANY, including but not limited to the following registered marks: United States Trademark Registration No. 7575518 for MOELIS, registered on November 26, 2024 for International Classes 35 and 36; and United States Trademark Registration No. 4904062 for MOELIS & COMPANY, registered on February 23, 2016 for International Classes 35 and 36.

The disputed domain names were both registered on October 2, 2025 and direct to inactive pages, without any relevant content.

The Respondent is a self-represented individual from China.

#### **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 names.

Notably, the Complainant contends that it holds registered trademark rights in “MOELI” and MOELIS & COMPANY, which identify its global financial advisory services. The Complainant argues that the disputed domain names wholly incorporate the distinctive and non-dictionary term “Moelis”, and that the additional terms such as “global” and “ai” do not avoid confusing similarity.

Additionally, the Complainant contends that the Respondent has no rights or legitimate interests in the disputed domain names. It argues that the Respondent is neither affiliated with nor authorized by the Complainant to use the MOELIS mark, and the Whois information shows that the Respondent is not commonly known by the disputed domain names. The Complainant essentially submits that the Respondent has not used the disputed domain names for any bona fide offering of goods or services, has never been known by the names, and cannot demonstrate any prior rights in the Complainant's trademark.

Finally, the Complainant contends that the Respondent registered and is using the disputed domain names in bad faith. The Complainant argues that the Respondent's incorporation of the entire “Moelis” mark, together with relevant business descriptors, shows clear awareness of the Complainant and its well-known financial services brand, making coincidence implausible. The Complainant submits that the Respondent's registration of domain names that are confusingly similar to the Complainant's official domain name, without any legitimate interest, constitutes opportunistic bad faith and poses a security risk to the Complainant.

## **B. Respondent**

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain names.

In its Response, the Respondent contends particularly that the disputed domain names are not confusingly similar to the Complainant's marks. The Respondent argues that the term "Moelis" is not exclusively associated with the Complainant and is also used as a personal or company name by others. The Respondent submits that the additional terms "global" and "ai" materially alter the meaning of the disputed domain names, pointing instead to concepts such as global information services or artificial intelligence, and therefore would not lead Internet users to assume any association with the Complainant. Moreover, the Respondent also claimed that "Moe" is a word originating from Japan, often used to describe things or people with cute, innocent, and lively qualities, especially in anime and manga culture. "Moelisai" can be understood as "萌妹李赛" ("cute girl Li Sai" or "萌妹 Lisa+i" ("cute girl Lisa+i").

Further, the Respondent contends that he has rights or legitimate interests in the disputed domain names. The Respondent argues that, before learning of the dispute, he had made demonstrable preparations to use the domain names for bona fide projects, including a global information platform under the disputed domain name <moelisglobal.com > and Artificial Intelligence ("AI")-related applications or services under the disputed domain name <moelisai.com>, and submits a lengthy business plan for each of the disputed domain names. The Respondent submits that these planned uses satisfy the criteria for bona fide use under paragraph 4(c) of the Policy and that temporary parking of the disputed domain names does not negate his legitimate interests.

Additionally, the Respondent contends that he neither registered nor used the disputed domain names in bad faith. He argues that the registrations were based on independent business concepts, that he has not attempted to sell the disputed domain names to the Complainant, and that no misleading use has occurred. The Respondent submits that simply listing a domain name for sale does not necessarily constitute bad faith; it must be judged in conjunction with the registration intent and actual impact. Without infringing on the trademark rights of others, the domain name holder has the right to park, display, develop, use, or sell/transfer their legally owned domain names. The Respondent notes his intention to add a clear disclaimer if the disputed domain names are developed. The Respondent also asserts that the Complainant is improperly attempting to broaden its trademark rights and requests that the Panel deny the Complaint.

## **6. Discussion and Findings**

### **6.1. Preliminary Issue: Language of the Proceeding**

The language of the Registration Agreement for the disputed domain names is English. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Registrar has confirmed that the language of the Registration Agreements for the disputed domain names is English. The Complaint and amended Complainant were filed in English. Therefore, according to paragraph 11(a) of the Rules, the default language of the proceeding shall be English.

The Complainant notes that the Registrar is headquartered in California, United States and asserts the language of the proceeding shall be English, arguing essentially that its trademarks are registered under the United States Patent and Trademark Office, and are being used by a United States-based company, where English is the official language and that the disputed domain names derive from the English pronunciation.

In its Response, the Respondent requests the language of the proceeding to be Chinese, stating that the language of the Registration Agreements was Chinese, which, the Panel notes, is contradictory with the Registrar's confirmation. The Respondent also supplemented this request by arguing that the Respondent is Chinese and that the Registrar provided a Chinese interface when registering the disputed domain names.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs (see WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.5.1).

Having considered all the matters above, also noting the Respondent has already filed a formal Response with the assistance of the machine translation and Panel is proficient in both Chinese and English, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English. Nevertheless, the Panel has reviewed and assessed all of the Respondent's submissions and evidence in this procedure, as filed in Chinese, and does not require a translation thereof.

## **6.2. Findings on the Merits**

### **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 names. [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 entirety of the Complainant's mark MOELIS is reproduced within both disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms here, "ai" and "global", 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 names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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.

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 names.

The Respondent has attempted to rebut the Complainant's prima facie showing by arguing essentially that the MOELIS mark is not unique to the Complainant and that the Respondent has made preparations to use the disputed domain names in the context of a bona fide offering of goods and services. To this end, the Respondent submits two extensive and lengthy business plans which are claimed to support prospective use of the disputed domain names, thereby asserting ambitious objectives such as developing an AI-driven global business information platform targeting Fortune 500 companies and covering notably more than 200 countries and regions etc. The Panel notes that the Respondent provides no other supporting evidence, such as evidence of initial development and preparations which should underly such advanced software platform or any other type of financing, marketing, expenses or other credible signs of pursuit of the alleged business plans. The Panel additionally observes, based on its review using publicly available online analytics tools, that it is highly likely that these business plans were for substantially and substantially generated by AI software.

The Panel does not agree with these arguments presented by the Respondent. First, the Panel considers that the Respondent has not established, demonstrated, or made plausible any explanation of using the alleged term "moelis" other than as a reference to the MOELIS trademarks. The Respondent is not commonly known by the disputed domain names or the term "Moelis" and has provided no credible alternative explanation for the inclusion of this term in the disputed domain names. Additionally, the Panel finds that the Respondent's asserted "preparations" do not establish rights or legitimate interests under paragraph 4(c) of the Policy. Aside from the two apparently self-produced business plan documents, the Respondent provides no corroborating evidence of any genuine preparatory steps, which could include technical development, financing, marketing activities, incurred expenses, or any other credible indicia of a real commercial undertaking, which would be likely given the vast scope of the alleged intended business. Given the absence of such supporting material and the Panel's assessment that the submitted business plans were likely generated largely by AI software, the Panel is not persuaded that the Respondent's claimed preparations reflect a bona fide intention to use the disputed domain names. Accordingly, the Respondent has failed to demonstrate rights or legitimate interests in the disputed domain names.

Finally, the Panel finds that the nature of the disputed domain names, being confusingly similar to the MOELIS trademarks and solely consisting of the MOELIS mark combined with the descriptive words "ai" and "global", thereby suggesting that the websites at the disputed domain names are designated websites for the global operations or AI services under the MOELIS mark, carries a risk of implied affiliation (see [WIPO Overview 3.0](#), section 2.5.1).

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 Panel notes that the Respondent has registered the disputed domain names which are confusingly similar to the Complainant's MOELIS & COMPANY and MOELIS trademarks, which were registered or used years before the registration date of the disputed domain names. Furthermore, the Panel notes that even a cursory Internet search at the time of registration of the disputed domain names would have made it clear to the Respondent that the prior existing trademark for MOELIS and the domain name <moelis.com>. The Respondent suggests Moelis is an English surname, however, the Respondent's name has nothing to do with this. In addition, according to the Respondent's business plans, the Respondent seems to assert that "MoelisGlobal" represents "魔力石环球" which may be translated as "Magic Stone Global" while MoelisAI represents "魔力石 AI", which may be translated as "Magic Stone AI". The Panel does not see any apparent connection between Moelis and 魔力石 ("Magic Stone"). Moreover, the Panel suspects that the

Respondent's business plans were largely generated by AI software; while this is not an indicia of bad faith by itself, in the context of this case, it gives the impression of being fabricated to put up a defense that is not supported by the facts. In the absence of any credible explanation from the Respondent regarding the choice of "moelis" in the disputed domain names, in the Panel's view, it is more likely than not that the Respondent has registered the disputed domain names in bad faith.

As to use in bad faith, panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record and particularly the absence of any credible evidence of good faith use or preparations of good faith use of the disputed domain names as discussed under the second element, as well as the reputation of the MOELIS trademarks and the composition of the disputed domain names, the Panel finds on balance that in the circumstances of this case the passive holding of the disputed domain names does not prevent a finding of 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 names <moelisai.com> and <moelisglobal.com> be transferred to the Complainant.

*/Deanna Wong Wai Man/*

**Deanna Wong Wai Man**

Sole Panelist

Date: December 8, 2025