

ADMINISTRATIVE PANEL DECISION

Flatiron Health, Inc. v. Steve Lavin
Case No. D2026-0981

1. The Parties

The Complainant is Flatiron Health, Inc., United States of America ("United States"), represented by The Moskowitz Firm, United States.

The Respondent is Steve Lavin, United States.

2. The Domain Name and Registrar

The disputed domain name <flatironhealthcare.com> is registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on March 6, 2026. On March 6, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 9, 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 (Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 9, 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 March 9, 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 March 10, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 30, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 9, 2026.

The Center appointed W. Scott Blackmer as the sole panelist in this matter on April 16, 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.

The Panel issued Administrative Procedural Order Number 1 on April 17, 2026, requesting that the Complainant amend the Complaint to waive claims against the Internet Corporation for Assigned Names and Numbers (ICANN), as required by Rule 3(b)(xiii). The Complainant did so in its Second Amended Complaint filed on April 17, 2027.

4. Factual Background

The Complainant is a “healthtech” corporation organized under the laws of the State of Delaware, United States, and headquartered in New York, New York, United States. The Complainant provides technology and services to support patient care in hundreds of cancer centers, more than 20 global oncology therapeutics developers, and cancer researchers and medical regulatory bodies worldwide. The Complainant was founded in 2012, became an affiliate of the Roche Group in 2018, and has subsidiaries in Japan, Germany, and the United Kingdom.

The Complainant operates a website at “www.flatiron.com”, to which its domain name <flatironhealth.com> also redirects. The Complainant’s website cites over 2000 publications by the Complainant, reprints its press releases, and details its participation in industry events and recognition in media stories in the United States and other countries. The Panel notes that these materials routinely refer to the Complainant and its services or publications using the name FLATIRON HEALTH or the abbreviated name FLATIRON.

The Complainant holds relevant United States trademark registrations, including Registration Number 4408549 (registered on September 24, 2013) for the word mark FLATIRON and Registration Number 4530467 (registered on May 13, 2014) for the word mark FLATIRON HEALTH, both in international classes 35 and 42. The Complainant also holds United States Trademark Registration Number 5449942 (registered on April 17, 2018) in the same international classes for a figurative FLATIRON mark consisting of that word in stylized lower-case letters beside two diamonds. This is the logo that appears in color on the Complainant’s website.

The disputed domain name was created on August 7, 2025, and is registered to the Respondent Steve Lavin, listing a postal address in the State of Pennsylvania, United States, and a Gmail contact email address.

The Complaint attaches screenshots of the website to which the disputed domain name resolved in March 2026 (the “Respondent’s website”). Access to the home page has been blocked at the time of this proceeding, although the Complainant demonstrates that internal pages can still be accessed. The Respondent’s website displayed a logo different from the Complainant’s featuring the words “FLATIRON HEALTHCARE” in capital letters following an arrow-shaped figure, advertising “Healthcare Solutions” with “Comprehensive technology solutions designed specifically for healthcare organization to improve patient care, streamline operations, and ensure compliance”. The multi-page website claimed that Flatiron Healthcare was founded in Charleston, West Virginia, United States in 2017 and operates in Canada, the United Kingdom, and Australia, serving more than 500 healthcare organizations “across 15+ countries”. The Panel notes that the online database of the West Virginia Secretary of State has no listing for a registered business entity with a name corresponding to “Flatiron Healthcare”.¹

¹ Noting the general powers of a panel articulated in paragraphs 10 and 12 of the Rules, it is commonly accepted that a panel may undertake limited factual research into matters of public record, as the Panel has done in these proceedings. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.8.

A contact form on the Respondent's website solicited site visitors' contact details and furnished an email address and telephone number. The Complainant reports that the telephone number is non-functional but is a vanity number spelling the word "flatiron", suggesting an affiliation with the Complainant. The site included a "Portal Login" button, which redirected users to a login interface. The Complainant suggests that this was an attempt to phish for the login credentials of healthcare professionals who believed that they were accessing the Complainant's systems.

The Respondent's website displayed the names, photographs, and short biographical information about its "Leadership Team", but these are dubious. For example, the Panel notes that the photograph and much of the text in the biography of the CEO appear to be copied from the LinkedIn profile of a man with the same name, but the LinkedIn profile makes no mention of any involvement in a company called "Flatiron Healthcare". There is also no company listing on LinkedIn for "Flatiron Healthcare", and the other supposed officers seem to have no LinkedIn profiles, including the ostensible former chief medical information officer of the prestigious Mayo Clinic, who might be expected to have a professional social media presence.

The Respondent's website also claimed that Flatiron Healthcare holds 23 patents, yet there is no record of this in the online database of the United States Patent and Trademark Office. The website further claimed "13 industry awards", but these were not named or cited. The site displayed blocks of anodyne or meaningless text and even negative "metrics" (such as an unconvincing "\$0 Average Annual Cost Savings" and a less than praiseworthy "11% Client Satisfaction Rate") suggestive of AI slop rather than human drafting.

In short, the Respondent's website was replete with multiple indications that it was a fictitious site not associated with a genuine business enterprise.

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 confusingly similar to its FLATIRON and FLATIRON HEALTH marks. The Complainant asserts that the Respondent has no permission to use the marks, which were registered and in use for many years before the disputed domain name was registered, and contends that the record indicates that the Respondent has not used the disputed domain name for a legitimate commercial offering but rather for an imitative and fraudulent website, evidently as part of a phishing scheme. The fact that the website pretends to offer specific services similar to the Complainant's in medical technology, clinical research, electronic healthcare records, healthcare analytics, medication management, and healthcare cybersecurity, shows awareness of the Complainant and targeting of the Complainant's mark. The Complainant argues that this demonstrates bad faith as well as a lack of legitimate interests and infers that the Respondent's purpose was to phish for personal information from site visitors, possibly including login credentials from those who mistakenly believed that they were in contact with the Complainant.

B. Respondent

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

6. Discussion and Findings

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 (the registered FLATIRON and FLATIRON HEALTH marks) for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the marks is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the marks 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. As noted above, the Respondent's website bears many indicia of an imitative and fictitious site that does not represent a genuine business concern with a corresponding name, and the Panel finds no evidence of such an enterprise in the relevant public records.

Panels also have held that the use of a domain name for illegitimate or illegal activity, here claimed as impersonation and phishing, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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.

In the present case, the Panel notes that the Respondent was likely aware of the Complainant's long-established business and marks, as the Respondent's website advertised specific, specialized services in the healthcare technology industry similar to those for which the Complainant is known. Intentionally using a domain name confusingly similar to a trademark to attract Internet users for commercial gain is one of the examples of bad faith given in the Policy (paragraph 4(b)(iv)).

Panels also have held that the use of a domain name illegitimate or illegal activity, here claimed as impersonation and phishing, as described above, constitutes bad faith. [WIPO Overview 3.1v](#), section 3.4. This is commonly the purpose of publishing such an imitative website with a contact page and login portal, although in some cases such sites are also used to distribute malware.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes 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 <flatironhealthcare.com> be transferred to the Complainant.

/W. Scott Blackmer/

W. Scott Blackmer

Sole Panelist

Date: April 21, 2026