

ADMINISTRATIVE PANEL DECISION

Milliman, Inc. v. Zhichao Yang
Case No. D2026-2422

1. The Parties

The Complainant is Milliman, Inc., United States of America (“United States”), represented by Adams and Reese LLP, United States.

The Respondent is Zhichao Yang, China.

2. The Domain Names and Registrars

The disputed domain name <millimambenefits.com> is registered with GoDaddy.com, LLC.

The disputed domain name <mllimanbenefits.com> is registered with NameSilo, LLC.

Unless otherwise specified, the Registrars shall be collectively referred to herein as the “Registrar”.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 4, 2026, initially only in regard to the disputed domain name <mllimanbenefits.com>. On June 4, 2026, the Center transmitted by email to the Registrar NameSilo, LLC a request for registrar verification in connection with the disputed domain name. On June 4, 2026, the Registrar NameSilo, LLC 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 (User #ff33aa94 Privacy, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 5, 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 June 10, 2026, also requesting the addition of the disputed domain name <millimambenefits.com> to these proceedings. On June 12, 2026, the Center transmitted by email to the Registrar GoDaddy.com, LLC a request for registrar verification in connection with the additional disputed domain name. On June 13, 2026, the Registrar GoDaddy.com, LLC 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 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 June 15, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 5, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 6, 2026.

The Center appointed Alfred Meijboom as the sole panelist in this matter on July 7, 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 Complainant is an independent actuarial and consulting firm which has been operating in the areas of employee benefits, investment, property and casualty, healthcare, life and financial services, and insurance services since 1947. The Complainant operates in various markets throughout the world, and has seventy offices located in Africa, Asia Pacific, Europe, Latin America, North America, and the Middle East.

The Complainant owns registered trademarks for MILLIMAN, including:

- United States trademark MILLIMAN with registration number 3592193, registered on March 17, 2009 for goods and services in classes 9, 16, 35, 36, 41; and
- International trademark MILLIMAN and device with registration number 959067, registered on August 10, 2007, for goods and services in classes 9, 16, 35, 36, 41, designating, inter alia, China.

The Complainant also owns several domain names and operates its principal websites at <milliman.com> and <millimanbenefits.com>.

The disputed domain name <millimambenefits.com> was registered on February 25, 2013, and redirects to a webpage titled “Access Your Milliman Employee Benefits Online,” which features information regarding how to use the Complainant’s online portal. Between paragraphs of text, the webpage also displays pay-per-click advertising links to websites purportedly offering services identical to those offered by the Complainant. Certain hyperlinks on the webpage result in a download prompt which invites the user to “View PDF” and open a link, which the Complainant alleges to be likely for purposes of distributing malware.

The disputed domain name <mllimanbenefits.com> was registered on June 28, 2018, and resolves to a parking page showing pay-per-click advertising links to the Complainant’s website and other websites purportedly offering services identical to those offered by the Complainant.

According to the Complainant, it discovered the disputed domain names in May 2026, and its legal representative filed a takedown request on the website connected to the disputed domain name <mllimanbenefits.com> on May 29, 2026 and sent the Respondent a cease and desist letter in relation to the disputed domain name <millimambenefits.com> on June 1, 2026. The Respondent has not responded to these requests.

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 the disputed domain names are confusingly similar to the Complainant's MILLIMAN trademark, because the disputed domain names incorporate close typo-variants of the MILLIMAN trademark, followed by the generic word "benefits" which does not prevent the disputed domain names from being confusingly similar to the Complainant's MILLIMAN trademark. The disputed domain names each differ from the Complainant's MILLIMAN trademark and its domain name <millimanbenefits.com> only by one letter, which is insufficient to distinguish the disputed domain names from the Complainant's MILLIMAN trademark and constitutes a type of typosquatting which has long been condemned by UDRP panels.

The Complainant also contends that the Respondent has no rights or legitimate interests in respect of the disputed domain names because the Respondent is not, and has never been commonly known as "mlliman benefits" or "millimam benefits," and it has not and has never been a licensee or franchisee of the Complainant who has also never authorized the Respondent to register or use the Complainant's MILLIMAN trademark or to apply for or use any domain name incorporating this trademark. Further, the Complainant alleges that the Respondent is not using the disputed domain names in connection with a bona fide offering of goods or services, or in a legitimate non-commercial or fair manner because the disputed domain name <mllimanbenefits.com> directs to a parking page showing pay-per-click advertising links to the Complainant and other websites purportedly offering services identical or related to those of Complainant, and the webpage to which the disputed domain name <millimambenefits.com> redirects also displays pay-per-click advertising links to websites purportedly offering services identical to those offered by Complainant. The use of the disputed domain name <millimambenefits.com> to resolve to a webpage including a purported guide titled "Access Your Milliman Employee Benefits Online," discussion of Complainant's benefits portal, and references to services administered by the Complainant, is allegedly for the Respondent to pass itself off as a source of information authorized by or associated with the Complainant, which misleads Internet users, and in particular, the Complainant's client portal users, into believing that the Complainant operates such website under the disputed domain name <millimambenefits.com>. The Complainant also contends that the apparent use of the disputed domain name <millimambenefits.com> to distribute malware does not establish rights or legitimate interests in the disputed domain name.

According to the Complainant, because of its international reputation and the fact that MILLIMAN is a famous mark universally associated with the Complainant, it is not plausible that the Respondent could have been unaware of the Complainant at the time of the registration of the disputed domain names, which were therefore made in bad faith. The Complainant alleges that the Respondent's knowledge of the Complainant is confirmed by the inclusion of the word "benefits" in the disputed domain names, and the content of the website to which the disputed domain name <millimambenefits.com> resolves, which prominently references the Complainant and its services, including a purported guide titled "Access Your Milliman Employee Benefits Online," discussion of the Complainant's benefits portal, and references to services administered by the Complainant. The Complainant also alleges that the Respondent's knowledge of the Complainant is further confirmed by the fact that the Respondent is using the disputed domain names to display pay-per-click links to the Complainant's website and other websites purportedly offering services identical to those of the Complainant.

According to the Complainant, the Respondent is further using the disputed domain names in bad faith to divert Internet users, and particularly the Complainant's clients, to webpages with links advertising the Complainant's services and third parties' services that are identical and related to those offered by the Complainant, which generates unjustified revenues for each click-through of the sponsored links for the Respondent, thereby illegitimately capitalizing on the Complainant's name and reputation. Also, the Complainant considers the Respondent's apparent use of the disputed domain name <millimambenefits.com> to distribute malware as constituting additional evidence of the Respondent's bad faith. Finally, the Complainant notes that the Respondent has engaged in a pattern of cybersquatting, demonstrated by the Respondent's history in other UDRP proceedings in which it has been the named respondent in at least 155 other UDRP proceedings, including four domain names involving the Complainant.

B. Respondent

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

6. Discussion and Findings

The Respondent did not file a Response. However, as set out in WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.3, the consensus view of UDRP panels is that the respondent's default does not automatically result in a decision in favor of the Complainant. The Complainant must still establish each of the three elements required by paragraph 4(a) of the Policy. Although the Panel may draw appropriate inferences from the Respondent's default, paragraph 4 of the Policy requires the Complainant to support its assertions with actual evidence in order to succeed in this proceeding. Paragraph 14(b) of the Rules provides that, in the absence of exceptional circumstances, the panel shall draw such inferences as it considers appropriate from a failure of a party to comply with a provision or requirement of the Rules. The Panel finds that in this case there are no such exceptional circumstances.

Under the Policy, the Complainant must prove 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 has been 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 3.1](#), section 1.7.

The Panel finds that the MILLIMAN trademark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the Complainant's MILLIMAN trademarks for the purposes of the Policy ([WIPO Overview 3.1](#), section 1.7). The Panel is satisfied that each disputed domain name contains an intentional misspelling of the Complainant's MILLIMAN trademarks, as the "n" in "milliman" in the disputed domain name <millimambenefits.com> is replaced by an "m", and the "i" in "milliman" in the disputed domain name <mlimanbenefits.com> has been deleted.

Although the addition of other terms, in the disputed domain names the word "benefits", may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain names and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

Based on the available record, 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 names. 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 names such as those enumerated in the Policy or otherwise.

The use of the disputed domain names for pay-per-click links referring to the Complainant and services competing with those of the Complainant does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use, as such use capitalizes on the reputation and goodwill of the Complainant's MILLIMAN trademark and misleads Internet users. [WIPO Overview 3.1](#), section 2.9.

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 registration of the Complainant's MILLIMAN trademark in China, where the Respondent claims to be located, predates the Respondent's registration of the disputed domain name <millimambenefits.com> by more than five years and the disputed domain name <millimanbenefits.com> by more than a decade. Both disputed domain names consist of the Complainant's MILLIMAN trademark with a typographical error and the term "benefits", which term relates to the Complainant's activities in the field of employee benefits, whereas the disputed domain names are nearly identical to one of the Complainant's domain names <millimanbenefits.com>, which it uses to operate its principal website. Regardless of the fact that, at the time of their discovery by the Complainant in May 2026, the disputed domain names contained commercial links referring to the Complainant and to activities competing with those of the Complainant – which the Panel cannot take into account when assessing the Respondent's bad faith at the time of registration of the disputed domain names – the aforementioned facts are sufficient for the Panel to infer that the Respondent must have been aware of the Complainant and its MILLIMAN trademark at the time of registration of the disputed domain names. Consequently, the Panel is satisfied that the disputed domain names were registered in bad faith.

Further, the Panel is satisfied that the close similarity of the disputed domain names with the Complainant's MILLIMAN trademark, and the Respondent's use of the disputed domain names to direct to websites with pay-per-click links to the Complainant and competing services, and the use of the disputed domain name <millimambenefits.com> to redirect to a webpage titled "Access Your Milliman Employee Benefits Online," are all intentional attempts to attract, for commercial gain, Internet users to the Respondent's websites, by creating a likelihood of confusion with the Complainant's MILLIMAN trademark as to the source, sponsorship, affiliation, or endorsement of the Respondent's websites and of the products or services offered on the websites in connection with the disputed domain names (paragraph 4(b)(iv) of the Policy). The Panel is therefore satisfied that the Complainant showed that the Respondent used the disputed domain names in bad faith.

Consequently, the Panel finds that the third element of the Policy has also been established.

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 <millimambenefits.com> and <mllimanbenefits.com> be transferred to the Complainant.

/Alfred Meijboom/

Alfred Meijboom

Sole Panelist

Date: July 21, 2026