

ADMINISTRATIVE PANEL DECISION

The Trustees of Indiana University v. Adam Gatz, Indiana University Health
Case No. D2026-2578

1. The Parties

The Complainant is The Trustees of Indiana University, United States of America ("United States"), represented by Hall, Render, Killian, Heath & Lyman, P.C., United States.

The Respondent is Adam Gatz, Indiana University Health, United States.

2. The Domain Name and Registrar

The disputed domain name <indianauniversityhealths.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 June 12, 2026. On June 15, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 15, 2026, 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 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 25, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 15, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 23, 2026.

The Center appointed Kathryn Lee as the sole panelist in this matter on July 30, 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 the official corporate body and owner of the intellectual property of Indiana University. Among others, the Complainant owns a trademark registration for INDIANA UNIVERSITY HEALTH in the United States: Trademark Registration Number 4179917, registered on July 24, 2012. Indiana University Health is the name of a healthcare system in the state of Indiana with 16 hospitals and over 38,000 employees and has a partnership with the Indiana University School of Medicine. The Complainant also owns the domain name <indianauniversityhealth.com> which was registered on April 28, 2010, and is used for the Complainant's Indiana University Health system.

Based on the information provided by the Registrar, the Respondent is an individual with an address in the United States. The registrant information identifies the Respondent as "Adam Gatz, Indiana University Health" and lists one of the addresses of the Complainant.

The disputed domain name was registered on January 18, 2026, and does not resolve to any website with active content.

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 the mark in which the Complainant has rights since the disputed domain name incorporates the Complainant's INDIANA UNIVERSITY HEALTH mark, with only an extra letter "s" at the end.

The Complainant also contends that the Respondent has no rights or legitimate interests in the disputed domain name and confirms that it has not authorized or licensed rights to the Respondent in any respect. The Complainant further contends that there is no evidence of the Respondent's use of, or demonstrable preparations to use, the disputed domain name in providing any bona fide offering of goods or services. The Complainant also states that the Respondent's address is that of the Complainant but that the Respondent is not a former or current employee of the Complainant.

Finally, the Complainant contends that the disputed domain name was registered and is used in bad faith and contends that it received an alert regarding the disputed domain name from an internal brand intelligence team.

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 of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms – here, the letter “s” – 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 name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), 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 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.

Moreover, UDRP panels have found that domain names identical to a complainant’s trademark carry a high risk of implied affiliation. [WIPO Overview 3.1](#), section 2.5.1. Here, the disputed domain name is essentially identical to the Complainant’s trademark since the only difference is an additional letter “s” at the end of the name. Therefore, the disputed domain name is likely to mislead Internet users into believing that the website at the disputed domain name is related to and/or operated by the Complainant, contrary to the fact.

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.

First, panels have found that the mere registration of a domain name that is confusingly similar to a well-known trademark can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4. Here, the disputed domain name is confusingly similar to the Complainant’s trademark INDIANA UNIVERSITY HEALTH, which is well-known as a mark of the Complainant.

Further, panels have found that the non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for

purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, and attempted to visit the inactive website at the disputed domain name, the Panel notes the distinctiveness and reputation of the Complainant's trademark, the lack of any response from the Respondent, and the composition of the disputed domain name, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Moreover, the Respondent identified itself as "Adam Gatz, Indiana University Health" at the same address as the Complainant in the registration records. The Complainant has asserted that the Respondent is not affiliated with Indiana University Health, and the Respondent has not come forward to contest that assertion. The inclusion of "Indiana University Health" and the Complainant's address in the registrant information appears calculated to falsely suggest a connection with that institution and to lend legitimacy to the registration. As such, the Panel finds that this apparent misrepresentation of affiliation is a further circumstance supporting a finding of bad faith.

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 <indianauniversityhealths.com> be transferred to the Complainant.

/Kathryn Lee/

Kathryn Lee

Sole Panelist

Date: August 13, 2026