

ADMINISTRATIVE PANEL DECISION

CitiusTech Healthcare Technology Private Limited v. Ragini Patel
Case No. D2026-2778

1. The Parties

The Complainant is CitiusTech Healthcare Technology Private Limited, India, represented by Vutts & Associates LLP, India.

The Respondent is Ragini Patel, India.

2. The Domain Name and Registrar

The disputed domain name <citiushealth.com> is registered with Hostinger Operations, UAB (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 25, 2026. On June 25, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 26, 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 (Not Available) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 26, 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 30, 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 July 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 24, 2026.

The Center appointed Shwetasree Majumder as the sole panelist in this matter on July 28, 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 Indian company having its registered office in Mumbai, India. It is a provider of consulting and digital technology services to healthcare and life sciences companies, and operates in India, the United States of America, the United Kingdom, the United Arab Emirates, and Singapore. The Complainant was established in 2005 under the name Citius IT Solutions Private Limited and changed its name to CitiusTech Healthcare Technology Private Limited on October 10, 2015. Its subsidiary in the United States of America, CitiusTech, Inc., was established on July 11, 2005. The Complainant has used the mark CITIUSTECH as its brand name, corporate name, and umbrella trademark since 2005.

The Complainant owns trademark registrations for the CITIUSTECH mark in India and in the United States of America. The details of a few such registrations are as below:

- CITIUSTECH – Indian Trademark Registration No. 2690440 in class 9, dated March 3, 2014;
- CITIUSTECH – Indian Trademark Registration No. 2700671 in class 9, dated March 18, 2014; and
- CITIUSTECH – United States Trademark Registration No. 4628676, in the name of the Complainant's subsidiary, in classes 9 and 42, dated October 28, 2014

The Complainant also owns a number of CITIUSTECH-formative registrations, including for the marks CITIUS HEALTH, Indian Trademark Registration No. 6358579, CITIUS HEALTHCARE, Indian Trademark Registration No. 6358580, and CITIUS HEALTHTECH, Indian Trademark Registration No. 6358582, each registered in India in classes 9 and 42 on March 21, 2024.

The Complainant's official website is "www.citiustech.com". The domain name <citiustech.com> was registered on May 18, 2005.

The disputed domain name <citiustechhealth.com> was registered on March 17, 2026. The disputed domain name does not resolve to an active website; it resolves to a parked page maintained by the Registrar.

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.

The Complainant contends that it is a leading provider of consulting and digital technology to healthcare and life sciences companies, and that it has used the mark CITIUSTECH continuously and exclusively for approximately 21 years as its corporate name, brand name, and umbrella trademark. The Complainant asserts that CITIUSTECH is an invented word, that it is immediately associated with the Complainant. The Complainant further states that it has received numerous industry awards and recognition in the healthcare technology sector. The Complainant also submits that it has succeeded in a number of prior proceedings under the Policy concerning domain names incorporating the CITIUSTECH mark.

The Complainant further contends that the Respondent does not have rights or legitimate interests in the disputed domain name and registered and is using the disputed domain name in bad faith. The Complainant

submits that the disputed domain name was registered long after the Complainant's adoption, use, and registration of the CITIUSTECH mark, and that the Respondent registered it with actual or constructive knowledge of the Complainant's rights, a preliminary trademark search having been sufficient to reveal them. The Complainant asserts that the Respondent's purpose was to squat on the mark and to profit from an association with the Complainant, and that the Respondent's identity was concealed at the time of registration.

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 CITIUSTECH 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, "health", 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.

The Respondent is not affiliated with the Complainant and has not been authorized, licensed, or otherwise permitted to use the Complainant's CITIUSTECH trademark. There is no evidence in the record that the Respondent has been commonly known by the disputed domain name or has acquired any trademark rights in the term "citiustech". The disputed domain name does not resolve to an active website, and the Respondent has not used the disputed domain name in connection with any bona fide offering of goods or services, nor made any legitimate noncommercial or fair use of it. The Panel notes that the Complainant's mark CITIUSTECH is a coined and invented term with no dictionary meaning, and hence there is no plausible justification for the Respondent to register or use the disputed domain name wholly incorporating the mark CITIUSTECH. The Panel further notes that the disputed domain name combines the Complainant's mark with the term "health", which is related to the very sector in which the Complainant operates and which the Complainant has itself adopted in a family of registered marks including CITIUS HEALTH, CITIUS HEALTHCARE, and CITIUS HEALTHTECH. A domain name so composed carries a high risk of implied affiliation, effectively suggesting sponsorship or endorsement by the Complainant; such composition prevents a finding of rights or legitimate interests. [WIPO Overview 3.1](#), 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.

In the present case, the Panel notes that the Complainant has used the CITIUSTECH mark since 2005 and holds trademark registrations in India and the United States of America dating from 2014, all of which predate the registration of the disputed domain name on March 17, 2026. The Panel further notes that CITIUSTECH is a coined and invented term with no dictionary meaning, and that the Respondent is located in India, where the Complainant is headquartered and where its mark has been used for approximately two decades. The disputed domain name pairs that coined mark with the term "health", corresponding directly to the Complainant's field of business and echoing the Complainant's own CITIUSTECH formative marks. In these circumstances, the Panel finds it unlikely that the Respondent registered the disputed domain name without knowledge of the Complainant and its trademark rights at the time of registration. The Respondent has offered no explanation for its selection of the disputed domain name and chose not to respond to the present proceedings.

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.

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. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the reputation of the Complainant's trademark, 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. In reaching this conclusion, the Panel has had regard to the following: (i) the Complainant's CITIUSTECH mark has been used continuously for approximately two decades; (ii) the disputed domain name does not resolve to an active website and resolves only to a parked page maintained by the Registrar; (iii) the Respondent has failed to respond to the Complaint in these proceedings; and (iv) in these circumstances, it is not possible to conceive of any plausible legitimate use of the disputed domain name, which reproduces the Complainant's mark in its entirety together with a term relating to the Complainant's own field of activity.

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 <citustechhealth.com> be transferred to the Complainant.

/Shwetasree Majumder/

Shwetasree Majumder

Sole Panelist

Date: August 11, 2026