

ADMINISTRATIVE PANEL DECISION

PlanMember Financial Corporation v. Host Master, Njalla Okta LLC
Case No. D2026-3214

1. The Parties

The Complainant is PlanMember Financial Corporation, United States of America ("United States"), internally represented.

The Respondent is Host Master, Njalla Okta LLC, Saint Kitts and Nevis.

2. The Domain Name and Registrar

The disputed domain name <my-planmember.com> is registered with Tucows Domains Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 22, 2026. On July 22, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 22, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 24, 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 amendments to the Complaint on July 28, 2026, and August 7, 2026.

The Center verified that the Complaint together with the amendments to the 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 August 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 1, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 3, 2026.

The Center appointed Estela Mariel de Luca as the sole panelist in this matter on September 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 one of the leading providers of retirement plan services, investment products, and annuity solutions, with more than 32 years of experience offering and promoting its goods and services under the PLANMEMBER trademark.

The Complainant is the owner of various trademark registrations including the following:

- United States trademark registration No. 6,318,746 PLANMEMBER, registered on April 13, 2021, in International classes 36 and 41;
- United States trademark registration No. 8,246,791 MYPLANMEMBER, registered on May 5, 2026, in International classes 9 and 42; and
- United States trademark registration No. 6,474,127 PLANMEMBER ONLINE, registered on September 7, 2021, in International class 36.

The Complainant owns the domain name <planmember.com>, registered on October 21, 1995, among others.

The disputed domain name was registered on June 20, 2026. The Complaint includes a screenshot showing that, upon entering the disputed domain name, the Complainant's PLANMEMBER circle design logo and the wording "PlanMember Services" appeared in the browser tab, while the webpage itself displayed a message stating that the site cannot be reached.

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 wholly incorporates the MYPLANMEMBER trademark, and that the addition of a hyphen between the terms "my" and "planmember" does not avoid a likelihood of confusion.

The Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name, as the Respondent: (i) does not own a trademark registration incorporating the disputed domain name; and (ii) is not making a legitimate or bona fide use of the disputed domain name, since it resolves to a website displaying the Complainant's registered PLANMEMBER mark and distinctive circle design logo.

The Complainant contends that the Respondent registered and is using the disputed domain name in bad faith. Specifically, the Complainant alleges that the Respondent's bad faith is evidenced by its impersonation of the Complainant's website, as well as by the webpage source, which references the Complainant's website content and login formats. According to the Complainant, these circumstances are likely to mislead Internet users into believing that the disputed domain name is an official webpage of the Complainant, creating a substantial risk given the Complainant's handling of personal and financial information.

Furthermore, the Complainant contends that such registration breaches the Registration Agreement, under which the Respondent represented that the registration of the disputed domain name would not infringe upon the legal rights of any third party.

Finally, the Complainant submits that the disputed domain name is a simple variation of the Complainant's mark, constituting typosquatting, and that the addition of a hyphen represents only a minor variation.

B. Respondent

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

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Complainant carries the burden of proving:

- (i) that the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) that the disputed domain name has been registered and is being used in bad faith.

The Respondent's default in the case at hand does not automatically result in a decision in favor of the Complainant, however, paragraph 5(f) of the Rules provides that if the Respondent does not submit a Response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the Complaint.

Further, according to paragraph 14(b) of the Rules, the Panel may draw such inferences from the Respondent's failure to submit a Response as it considers appropriate.

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 Panel finds that the MYPLANMEMBER trademark is recognizable within the disputed domain name, and the addition of the hyphen does not prevent a finding of confusing similarity. [WIPO Overview 3.1](#), sections 1.7 and 1.8.

Accordingly, the disputed domain name is confusingly similar to the mark 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.

There is no evidence that the Respondent has been commonly known by the disputed domain name, nor that the Respondent is affiliated with the Complainant or has been authorized or licensed to use the MYPLANMEMBER trademark or to register any domain name incorporating such mark. Furthermore, the record contains no indication that it has used the disputed domain name in connection with a bona fide offering of goods or services, or that it has made a legitimate noncommercial or fair use of the disputed domain name. The Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name within the meaning of paragraph 4(a)(ii) of the Policy.

The Panel notes the reputation of the Complainant’s trademark and that upon entering the disputed domain name, the Complainant’s PLANMEMBER circle design logo and the wording “PlanMember Services” appeared in the browser tab, indicating that the Respondent likely intended to use the disputed domain name to impersonate the Complainant. Panels have held that the use of a domain name for illegitimate activity, including impersonation, 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. [WIPO Overview 3.1](#), section 3.2.1.

The evidence demonstrates that the Complainant’s rights in the MYPLANMEMBER trademark predate the registration of the disputed domain name. The Panel further notes that the disputed domain name wholly incorporates the Complainant’s MYPLANMEMBER trademark and the mere addition of a hyphen does not prevent the finding of bad faith. In the circumstances of the present case, the composition of the disputed domain name, together with the use of the circle logo and the wording “PlanMember Services” in the browser tab, supports a finding that the Respondent was likely aware of the Complainant’s trademarks and commercial activities when registering the disputed domain name.

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 Panel further notes that, although the disputed domain name currently does not resolve to an active website, the webpage source expressly presents the website as a member login portal for “PlanMember Services” and contains multiple references to the Complainant’s name, services, and login functions. In particular, the webpage source identifies “PlanMember Financial Corporation” and invites users to “Sign in to your retirement plan account” with “secure two-step verification”. The Panel finds that such specific references to the Complainant and its services are consistent with an intent to impersonate the Complainant.

Panels have held that the use of a domain name for illegitimate activity, here, claimed impersonation, passing off, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. 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 <my-planmember.com> be transferred to the Complainant.

/Estela Mariel de Luca /

Estela Mariel de Luca

Sole Panelist

Date: September 16, 2026.