

ADMINISTRATIVE PANEL DECISION

UnitedHealth Group Incorporated v. DeAndre Moore
Case No. D2026-3779

1. The Parties

The Complainant is UnitedHealth Group Incorporated, United States of America (“United States”), represented by The GigaLaw Firm, United States.

The Respondent is DeAndre Moore, United States.

2. The Domain Name and Registrar

The disputed domain name <unitedhearing.org> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 24, 2026. On August 25, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 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 (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 27, 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 amendment to the Complaint on August 27, 2026.

The Center verified that the Complaint together with the amendment 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 28, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 17, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 18, 2026.

The Center appointed Evan D. Brown as the sole panelist in this matter on September 23, 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 a healthcare and well-being company whose businesses include UnitedHealthcare, through which it provides health benefits and related services. The Complainant owns numerous trademark registrations incorporating the term “UNITED,” including United States Trademark Registration No. 4,195,540 for UNITEDHEALTHCARE, registered on August 21, 2012, and European Union Trademark Registration No. 1,156,058 for UNITEDHEALTH GROUP, registered on November 27, 2000.

The Complainant also offers a service known as “UnitedHealthcare Hearing,” which provides access to hearing providers and hearing aids. The Complainant operates a website for that service using the domain name <uhchearing.com>, which was registered on January 29, 2019.

The disputed domain name was registered on July 20, 2025. It resolves to a website that purports to provide “Expert Hearing Health Resources” and contains hearing-related articles and advertisements for hearing aids that link to a third-party commercial website.

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 the disputed domain name is confusingly similar to its trademarks because it combines the term “united,” a prominent element of the Complainant’s marks, with the descriptive term “hearing,” which directly relates to the Complainant’s UnitedHealthcare Hearing service.

The Complainant further contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant asserts that the Respondent is not commonly known by the disputed domain name and has not been authorized to use the Complainant’s marks. Although the website associated with the disputed domain name purports to provide “Expert Hearing Health Resources,” the Complainant contends that the website is not a bona fide informational or hearing-health enterprise, but instead is a pretext for generating advertising revenue.

In support of this contention, the Complainant points to numerous features of the website. Among other things, the website displays “Vexon” branding associated with a commercially available blog template; identifies “Dr. Emily Chen” as its Chief Audiologist, who, the Complainant asserts, does not appear to be a real person; contains nonfunctioning “Contact”, “Subscribe”, “Privacy Policy”, and “Terms & Conditions” pages; provides social-media links that either contain no content, lead to an unavailable page, or lead only to a social-media platform’s home page; and displays the placeholder telephone number “123-456-7890.” The Complainant further notes that the website contains advertisements for hearing aids that direct users to a third-party commercial website.

The Complainant contends that these circumstances also demonstrate that the disputed domain name was registered and is being used in bad faith. According to the Complainant, the Respondent could not have been unaware of the Complainant and its UNITED-formative trademarks and domain names, including <uhchearing.com>, when it registered the disputed domain name. The Complainant further contends that the Respondent used the disputed domain name for a website concerning the same subject matter in order to attract Internet users for commercial gain.

The Complainant also relies on a VirusTotal report in which one security vendor characterized activity associated with the disputed domain name as “suspicious.” Finally, the Complainant submits an email dated May 22, 2026, from an attorney for a company operating in the hearing-aid industry, reporting that his client, while viewing Facebook, discovered a listing under the name “United Hearing” and thought it was the Complainant’s “hearing” branch or an initiative of the Complainant concerning hearing health. The Complainant characterizes this as evidence of actual confusion that further demonstrates the Respondent’s targeting of the Complainant and bad faith under paragraph 4(b)(iv) of the Policy.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy requires the Complainant to prove each of the following:

- (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.

The Respondent’s failure to submit a response does not relieve the Complainant of its burden of establishing each of these elements. Where a respondent defaults, however, the Panel may draw such inferences from the default as it considers appropriate, while still independently assessing the record. Rules, paragraphs 5(f) and 14(b); WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.3.

A. Identical or Confusingly Similar

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 established rights in the UNITEDHEALTHCARE and UNITEDHEALTH GROUP marks through its trademark registrations. The disputed domain name does not reproduce either mark in its entirety. Where, however, at least a dominant feature of the relevant mark is recognizable in the domain name, the domain name will normally be considered confusingly similar to that mark. [WIPO Overview 3.1](#), section 1.7. Both of the Complainant’s marks begin with the term “united,” followed by the descriptive terms “health,” “healthcare,” or “group,” and “united” is the lead element of each mark. The disputed domain name begins with that same term. The Panel finds that “united” is a dominant and recognizable feature of the Complainant’s marks and that the marks are recognizable in the disputed domain name. This conclusion is further supported by the case context, including the Respondent’s use of the disputed domain name for a website concerning hearing health and hearing aids, which tends to confirm that the disputed domain name was selected with the Complainant and its hearing-related services in mind. [WIPO Overview 3.1](#), section 1.15.

The additional term “hearing” does not prevent a finding of confusing similarity. [WIPO Overview 3.1](#), section 1.8. The term is descriptive and refers to a field in which the Complainant offers services. In addition, the generic Top-Level Domain “.org” is disregarded under the first element. [WIPO Overview 3.1](#), section 1.11.1.

Accordingly, the Panel finds that the disputed domain name is confusingly similar to trademarks in which the Complainant has rights, and that the Complainant has established the first element of the Policy.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which a 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. Accordingly, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name, although the burden of proof remains on the complainant. [WIPO Overview 3.1](#), section 2.1.

The Complainant has not authorized the Respondent to use its trademarks, and the record contains no evidence that the Respondent has been commonly known by the disputed domain name.

Nor does the Respondent's use of the disputed domain name establish a bona fide offering of goods or services or a legitimate noncommercial or fair use. Although the website purports to provide “Expert Hearing Health Resources,” the record contains numerous indications that it does not represent a genuine independent hearing-health organization. The website retains “Vexon” branding associated with a commercially available blog template; identifies a purported Chief Audiologist whose identity and qualifications are not substantiated in the record; contains nonfunctioning “Contact”, “Subscribe”, “Privacy Policy”, and “Terms & Conditions” pages; provides social-media links that lead to an empty or unavailable page or merely to a social-media platform's home page; and displays the placeholder telephone number “123-456-7890.”

At the same time, the website contains advertisements for hearing aids that link to a third-party commercial website. Viewed together, these circumstances undermine any suggestion that the disputed domain name is being used for a bona fide independent hearing-health enterprise or for a legitimate noncommercial or fair use. Rather, the record supports the Complainant's contention that the website's apparent informational character serves as a pretext for commercial advertising.

The Complainant has therefore established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name. The Respondent has not rebutted that showing or come forward with any evidence demonstrating rights or legitimate interests in the disputed domain name.

Accordingly, the Panel finds that the Complainant has established the second element of the Policy.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances that may be evidence of the registration and use of a domain name in bad faith. Among them is a respondent's use of the domain name to intentionally attempt to attract, for commercial gain, Internet users to its website or other online location by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website or of a product or service on it. Policy, paragraph 4(b)(iv).

The Panel finds that the Respondent more likely than not registered the disputed domain name with knowledge of the Complainant and its trademark rights. The Complainant's UNITEDHEALTH GROUP and UNITEDHEALTHCARE registrations date from 2000 and 2012, long before the disputed domain name was registered on July 20, 2025. The Complainant is a large healthcare company. The disputed domain name combines “united,” the lead element of the Complainant's marks, with “hearing,” a term that corresponds to the Complainant's hearing services, and the Respondent used it for a website offering hearing-health content and advertisements for hearing aids. In the Panel's view, this combination, together with the circumstances discussed below, supports a finding that the Respondent targeted the Complainant. [WIPO Overview 3.1](#), section 3.2.2.

The nature of the website provides further support. Although the website presents itself as an informational hearing-health resource, the circumstances discussed in section B of this Decision above cast substantial doubt on whether it represents a genuine independent hearing-health organization. It also carries advertisements for hearing aids that link to a third-party commercial website. The Panel infers that the Respondent obtains, or expects to obtain, a commercial benefit from this traffic.

The Respondent's website does not refer to the Complainant. The likelihood of confusion here arises from the disputed domain name itself, which combines the lead element of the Complainant's marks with a term describing the Complainant's hearing services and so suggests to Internet users interested in hearing services an affiliation with the Complainant. The Complainant also submitted an email dated May 22, 2026, from an attorney for a hearing-aid company reporting that his client encountered a listing under the name "United Hearing" and believed it to be the Complainant's hearing branch or an initiative of the Complainant. While the record does not establish the precise circumstances surrounding that incident, the report is consistent with the likelihood of association created by the disputed domain name.

The Panel therefore finds that, by registering and using the disputed domain name in these circumstances, the Respondent intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's marks as to the source, sponsorship, affiliation, or endorsement of the website, within the meaning of paragraph 4(b)(iv) of the Policy.

Accordingly, 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 <unitedhearing.org> be transferred to the Complainant.

/Evan D. Brown/

Evan D. Brown

Sole Panelist

Date: October 7, 2026