

ADMINISTRATIVE PANEL DECISION

Eli Lilly and Company v. Ghulam Mustafa, dmcnic.com, Hussnain Raza Sheikh, Hosting PK, Pharma Medical, Pharma Medical, and Joony Smith
Case No. D2025-3168

1. The Parties

The Complainant is Eli Lilly and Company, United States of America ("United States"), represented by Faegre Drinker Biddle & Reath, United States.

The Respondents are Ghulam Mustafa, dmcnic.com, Pakistan; Hussnain Raza Sheikh, Hosting PK, Pakistan; Pharma Medical, Pharma Medical, Pakistan; and Joony Smith, Pakistan.

2. The Domain Names and Registrar

The disputed domain names <buyzepboundonline.org>, <mounjaroabudhabi.org>, <mounjaroegyptpharmacy.org>, <mounjaroenmexico.org>, <mounjaroundubaipharmacy.org>, <mounjaroineurope.org>, <mounjarokwikpen.com>, <mounjarosaudi Arabia.com>, and <zepboundmedication.com> are registered with CloudFlare, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 7, 2025. On August 8, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On August 9, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondents (dmcnic.com et al.) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 12, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all disputed domain names are under common control. The Complainant filed an amendment to the Complaint on August 13, 2025.

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 Respondents of the Complaint, and the proceedings commenced on August 19, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 8, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on September 9, 2025. On September 15, 2025, the Center provided the Respondents a five-day period in which to indicate whether they wish to participate in the proceedings. As no such communication was received, the Center notified the Parties of the commencement of panel appointment process on September 25, 2025.

The Center appointed Mario Soerensen Garcia as the sole panelist in this matter on September 26, 2025. 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 American multinational pharmaceutical company from Indianapolis, Indiana, founded in 1876.

The Complainant owns trademarks for MONJAURO and ZEPBOUND, including but not limited to:

Jurisdiction	Reg No.	Trademark	Reg. Date	Classes
United States	6,809,369	MOUNJARO	August 2, 2022	5
United States	7,288,373	ZEPBOUND	January 23, 2024	5

The Complainant also owns the domain names <mounjaro.com>, registered on October 21, 2019, and <zepbound.com>, registered on April 13, 2022.

The disputed domain names were registered on:

<buyzepboundonline.org>: June 16, 2025,
 <mounjaroabudhabi.org>: February 14, 2025,
 <mounjaroegyptpharmacy.org>: May 5, 2025,
 <mounjaroenmexico.org>: May 5, 2025,
 <mounjaroindubaipharmacy.org>: February 14, 2025,
 <mounjaroineurope.org>: June 16, 2025,
 <mounjarokwikpen.com>: May 5, 2025,
 <mounjarosaudiarabia.com>: May 5, 2025, and
 <zepboundmedication.com>: January 21, 2025.

The Complainant provided evidence that prior to filing of the Complaint all disputed domain names resolved to websites offering the Complainant's pharmaceutical goods for sale without a prescription (evidenced by Annex 19 of the Complaint). At time of this Decision all the listed disputed domain names, except <mounjaroabudhabi.org>, are active and continue offering, as alleged by the Complainant and unrebutted by the Respondents, counterfeit pharmaceuticals without a prescription for sale.

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.

The Complainant argues that the disputed domain names are confusingly similar to the trademarks MOUNJARO and ZEPBOUND respectively.

There is no evidence that the Respondents have made demonstrable preparations to use the disputed domain names for legitimate purposes, nor is there any evidence that the Respondents are using the disputed domain names in connection with any noncommercial or fair use. The Complainant argues that the Respondents have no rights or legitimate interests in respect of the disputed domain names.

That being the case, the Complainant finds that the disputed domain names can certainly make Internet users assume that the disputed domain names offer goods supplied and authorized by the Complainant.

According to the Complainant, it has prior rights over the trademarks MOUNJARO and ZEPBOUND and has not authorized the Respondents' registration and use of the disputed domain names.

The Complainant's intellectual property rights for the MOUNJARO and ZEPBOUND trademarks predate the registration of the disputed domain names.

According to the Complainant, the registration and use of the disputed domain names have been made in bad faith.

The Complainant requests the transfer of the disputed domain names.

B. Respondents

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

6. Discussion and Findings

6.1. Preliminary Issues – Consolidation: Multiple Respondents

The amended Complaint was filed in relation to different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.11.2.

As regards common control, the Panel notes the following:

- (1) all the disputed domain names were registered in a short time frame, between January 21, 2025, and June 16, 2025;
- (2) The disputed domain names share a similar naming pattern, combining the Complainant's MOUNJARO or ZEPBOUND trademarks with additional terms that may be related to the Complainant's services or geographically descriptive terms, offering counterfeit medical products.
- (3) all the disputed domain names have registrants that are supposedly based in Pakistan and, except for <mounjaroundubaiphararmacy.org> and <mounjaroabudhabi.org>, all of them are located in the same city.

(4) The websites at the disputed domain names have identical/similar layouts and advertise gray market or counterfeit versions of the Complainant's products using overlapping language, text and images.

(5) Same Parties have been previously involved in a different UDRP proceeding - see *Eli Lilly and Company v. Hussnain Raza Sheikh, Hosting PK; Ghulam Mustafa, dmcnic.com; Pharma Medical, Pharma Medical; and Joony Smith*, WIPO Case No. [D2025-1505](#).

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

6.2. Substantive Issues

In accordance with paragraph 4(a) of the Policy, the Complainant must prove that each of the three following elements is satisfied:

- (i) the disputed domain names are identical or confusingly similar to the trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain names; and
- (iii) the disputed domain names have been registered and are 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 names. [WIPO Overview 3.0](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the marks are recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.0](#), 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 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 3.0](#), 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.

Furthermore, the nature of the disputed domain names carries a risk of implied affiliation, as they effectively reproduce the Complainant's trademarks with geographic terms or terms related to the Complainant's activity field. The disputed domain names are used to offer potentially counterfeit versions of the Complainant's prescription-only MOUNJARO and ZEPBOUND products without the required prescription in jurisdictions where the products are not authorized for distribution. Panels have held that the use of a domain name for illegal activity, here, claimed as applicable to this case: sale of counterfeit goods and impersonation/passing off, or other types of fraud, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), 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.

In the present case, the Panel finds that the Respondent was clearly aware of MOUNJARO and ZEPBOUND marks as the websites under the disputed domain names displayed the Complainant's trademarks, intentionally misleading users into believing that there is an association between the Complainant and the websites, attempting to attract Internet users to the disputed domain names for commercial gain in bad faith by creating a likelihood of confusion with the Complainant's marks and offering counterfeit products for sale.

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 3.0](#), section 3.2.1.

Panels have held that the use of a domain name for illegal activity, here, claimed as applicable to this case: sale of counterfeit goods or illegal pharmaceuticals, and impersonation/passing off, or other types of fraud, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names 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 names <buyzepboundonline.org>, <mounjaroabudhabi.org>, <mounjaroegyptpharmacy.org>, <mounjaroenmexico.org>, <mounjaroindubaipharmacy.org>, <mounjaroineurope.org>, <mounjarokwikpen.com>, <mounjarosaudiArabia.com>, and <zepboundmedication.com> be transferred to the Complainant.

/Mario Soerensen Garcia/

Mario Soerensen Garcia

Sole Panelist

Date: October 10, 2025