

## **ADMINISTRATIVE PANEL DECISION**

Meta Platforms, Inc. v. Vladyslav Naumov  
Case No. D2025-3211

### **1. The Parties**

The Complainant is Meta Platforms, Inc., United States of America ("United States"), represented by Hogan Lovells (Paris) LLP, France.

The Respondent is Vladyslav Naumov, Ukraine.

### **2. The Domain Name and Registrar**

The disputed domain name <comprarlikesenfacebook.com> is registered with Dynadot Inc (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 11, 2025. On August 12, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 13, 2025, 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 (Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 14, 2025, 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 August 19, 2025.

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 August 20, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 9, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September, 10, 2025.

The Center appointed Reyes Campello Estebaran as the sole panelist in this matter on September 16, 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, formerly known as “Facebook, Inc.”, is a United States-based social technology company and a leading provider of online social networking services. The Complainant operates, inter alia, several social media platforms under the trademarks FACEBOOK, INSTAGRAM, META QUEST (formerly OCULUS), and WHATSAPP.

Founded in 2004, the Facebook platform is accessible online via its primary website, [www.facebook.com](http://www.facebook.com), as well as through a mobile application (the “App”), both of which are available worldwide in more than 70 languages. The Facebook website (“[www.facebook.com](http://www.facebook.com)”) and the App rank among the most visited websites and most frequently downloaded applications globally. As of December 31, 2023, the Facebook platform had approximately 3.07 billion monthly active users and 2.11 billion average daily active users worldwide.

The Complainant owns multiple trademark registrations for its FACEBOOK brand in numerous jurisdictions, including the following:

- United States Trademark Registration No. 4339123, FACEBOOK, word mark, registered on May 21, 2013, in Class 42;
- European Union Trade Mark Registration No. 005585518, FACEBOOK, word mark, registered on May 25, 2011, in Classes 35, 41, 42, and 45; and
- United States Trademark Registration No. 5,189,225 for the figurative, registered on April 25, 2017, in Classes 38, 41, 42, and 45, with the following graphic representation:



- European Union Trade Mark Registration No. 014997878 for the figurative, registered on April 20, 2020, in Classes 9, 16, 18, 20, 21, 25, 35, 38, 41, 42, 43, and 45, with the following graphic representation:



(hereinafter collectively referred to as the “FACEBOOK mark” and the “Thumb-up mark”, respectively).

Prior decisions under the Policy have recognized the worldwide renowned and famous character of the FACEBOOK mark. <sup>1</sup>

The Complainant further owns various domain names comprising its FACEBOOK mark, including <facebook.com> (registered on March 29, 1997), which resolves to its social media platform.

The disputed domain name was registered on November 7, 2024, and it resolves to a Spanish-language website that allegedly offers for sale likes, followers or fans for the Complainant’s Facebook and the Instagram platforms, as well as for other third parties’ social media platforms, such as TikTok, or Twitter. The website displays the heading “Más Likes y Fans para tu Facebook”, which translates as “more likes and fans for your Facebook”, and, in particular for Facebook, it purportedly offers various packages of “me gusta”

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<sup>1</sup>See, e.g., *Facebook Inc. v. te5gfh gtfghbfh*, WIPO Case No. [D2018-2433](#), (“the Complainant’s trademark FACEBOOK enjoys worldwide renown”); *Facebook, Inc. v. Naresh Bali*, WIPO Case No. [D2017-2510](#). (“Given the fame and worldwide recognition of the Complainant’s FACEBOOK trademark”); or *Facebook Inc. v. te5gfh gtfghbfh*, WIPO Case No. [D2018-2433](#), (“the Complainant’s trademark FACEBOOK enjoys worldwide renown, i.e., it is an internationally famous trademark”).

(likes) of different volume (1,000; 2,000; 3,000; 4,000; 5,000), for different prices (EUR 15, 25, 30, 34, 37, respectively). The website displays at its left margin “¡WEB DE ESPAÑA!” (Web of Spain), suggesting that it is operated from Spain, and its section “Qué hacemos” (“What do we do”) indicates that the business has already sold over one million fans for Facebook. The section “¿Cuál es el objetivo?” (“What is the objective?”) explains that the site is based on Facebook Marketing principles, with the goal of digitally capturing a large number of fans on Facebook to strengthen the brand image and improve the brand’s SEO ranking in online searches. The website provides no information regarding its owner or the owner of the disputed domain name. At the bottom of the page, in small font, there is a notice stating: “Esta página web no tiene ningún vínculo con la marca comercial Facebook. Es un portal totalmente independiente de esa marca.”, which translates as “This website has no affiliation with the Facebook brand. It is a completely independent portal.” The copyright notice reads: “© 2011-13 Más Likes y Fans para tu Facebook”, which translates as “© 2011-13 More Likes and Fans for your Facebook.”

According to the evidence submitted by the Complainant, the website associated with the disputed domain name displayed multiple images of a thumb-up logo resembling the Complainant’s registered figurative trademark, using a blue-and-white color scheme similar to that employed in the Complainant’s figurative marks and on the Facebook platform. At the time of this Decision, these thumb-up logos are no longer visible and appear to have been removed. A grey alert triangle is displayed in place of the removed images.

On June 23, 2025, the Complainant submitted a notice of trademark infringement through the Registrar’s registrant contact form. The Respondent did not respond.

## 5. Parties’ Contentions

### A. Complainant

The Complainant asserts that it has satisfied each of the elements required under the Policy for the transfer of the disputed domain name.

Specifically, the Complainant asserts that the disputed domain name incorporates the FACEBOOK mark and is therefore confusingly similar thereto. The addition of the terms “comprar” (“buy”), “likes”, and “en” (“on”) does not preclude a finding of confusing similarity, as the FACEBOOK mark remains clearly recognizable within the disputed domain name. Furthermore, the generic top-level domain (“gTLD”) “.com” is a standard registration requirement and may be disregarded when assessing confusing similarity.

The Complainant further asserts that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is not affiliated with the Complainant, has no authorization to use its trademarks, and there is no evidence suggesting that the Respondent is commonly known by the disputed domain name. The Respondent is not making a legitimate noncommercial or fair use of the disputed domain name, nor is it using the domain in connection with a bona fide offering of goods or services. The *Oki Data* criteria (as set out in *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#)) are not satisfied in this case. Specifically, (i) the website associated with the disputed domain name purports to offer for sale packages of fans on the Complainant’s social media platforms, which interferes with the proper functioning of these platforms and artificially inflates content popularity, in violation of the Meta Developer Policies and the Facebook Community Standards; (ii) the website contains numerous references to the Facebook platform, as well as depictions similar to the Complainant’s figurative marks, and employs a blue-and-white color scheme resembling that of the Facebook platform, thereby suggesting a false affiliation; and (iii) the disclaimer on the website is not prominently displayed and appears in small font in the footer. Prior UDRP panels have held that using a domain name to sell likes, followers, or shares constitutes an unauthorized and potentially prejudicial activity toward the social media platform owner and Internet users, and does not amount to a bona fide offering of goods or services.<sup>2</sup>

<sup>2</sup>The Complainant cites two UDRP prior decisions: *Meta Platforms, Inc. v. Dave Anothu, Influenceurs LTD*, WIPO Case No. [D2023-0338](#); and *Instagram, LLC v. 赵坤 (Zhao Kun)*, WIPO Case No. [D2022-0454](#).

Finally, the Complainant asserts that the disputed domain name was registered and is being used in bad faith. The highly distinctive and famous character of the FACEBOOK mark, the composition of the disputed domain name, and the content of the Respondent's website demonstrate prior knowledge of, and intent to target the Complainant, its trademarks, and its social media platforms. The use of a proxy service to conceal the Respondent's identity, coupled with the failure to respond to the cease-and-desist communication, constitutes further evidence of bad faith. The use of the disputed domain name and the content of the Respondent's website further corroborate this targeting. The Respondent has attempted to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant and its trademarks. Under these circumstances, the non-prominent disclaimer in the footer of the Respondent's website—even if it had been prominently displayed—does not prevent confusion and constitutes additional evidence of the Respondent's bad faith.

## **B. Respondent**

The Respondent did not file a response to the Complainant's contentions.

## **6. Discussion and Findings**

The Complainant has made the relevant assertions required under the Policy, and the dispute properly falls within its scope. The Panel has the authority to decide the dispute by examining the three elements set forth in paragraph 4(a) of the Policy, taking into account all relevant evidence, annexed materials, and allegations, and may conduct limited independent research pursuant to the general powers of the Panel, as articulated, *inter alia*, in paragraph 10 of the Rules.

### **6.1 Preliminary Matters**

The Panel notes that no communication has been received from the Respondent.

The Respondent's postal address is listed in Ukraine, which, at the date of this Decision, is subject to an international conflict that could affect case notifications. In accordance with its discretion under paragraph 10 of the Rules, the Panel has considered whether the proceedings should continue (see *Wilshire Refrigeration & Appliance, Inc. v. Oleksandr Kliuiev, Henrystlist.com*, WIPO Case No. [D2024-0962](#)). Having reviewed all circumstances, the Panel concludes that the proceedings should continue. The Panel notes that the Center used both the Registrar contact form and the Respondent's email address, as registered with the Registrar to notify the Complaint. There is no evidence that the notification emails were not successfully delivered.

Furthermore, the Respondent registered the disputed domain name on November 7, 2024, more than two years after the onset of the international conflict, and thus appears capable of controlling both the disputed domain name and its content. Having apparently received notification of the Complaint by email, the Respondent would have been able to prepare and submit a Response if it had wished to do so. The Panel also notes that the website hosted at the disputed domain name is in Spanish and displays the statement “¡WEB DE ESPAÑA!” (Web of Spain), suggesting its location in Spain, and claims that the business has sold over one million Facebook fans. This may support the inference that the Respondent is not actually located in Ukraine and is capable of controlling the site and receiving all email communications related to the disputed domain name.

Moreover, for the reasons analyzed later in this Decision, the Panel considers—despite the absence of a Response—that the Respondent registered and has used the disputed domain name in bad faith, with the intent to unfairly target the Complainant's goodwill in its trademarks.

Accordingly, the Panel finds that it may proceed to decide this case and draw inferences from the Respondent's failure to submit any Response. While the Respondent's failure to submit a Response does not automatically result in a decision in favor of the Complainant, the Panel may draw appropriate inferences from the Respondent's default. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”), section 4.3; see also *Verner Panton Design v. Fontana di Luce Corp.*, WIPO Case No. [D2012-1909](#).

## 6.2 Substantive Matters

### A. Identical or Confusingly Similar

It is well established that the first element primarily serves as a standing requirement. The standing (or threshold) test for confusing similarity entails a reasoned but relatively straightforward comparison between the Complainant's trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

The Complainant has demonstrated rights in respect of a trademark or service mark for the purposes of the Policy, namely the FACEBOOK mark and the Thumb-up mark. [WIPO Overview 3.0](#), section 1.2.1.

The entire FACEBOOK mark is reproduced and remains recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms—the Spanish terms “comprar” (“buy”), “en” (“on”), and the term “likes”—may be relevant to the assessment of the second and third elements, the Panel finds that such additions do not preclude a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

Further, the relevant Top-Level-Domain (“TLD”) in a domain name is considered a standard registration requirement and is therefore disregarded for the purposes of the first element of the confusing similarity test. [WIPO Overview 3.0](#), section 1.11.

Accordingly, 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 non-exhaustive 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 rests with the complainant, panels have recognized that establishing 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. Consequently, 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 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 Panel notes that the Respondent's name, as provided in the Registrar verification, does not resemble the terms included in the disputed domain name containing the FACEBOOK mark, and there is no evidence on record that the Respondent is commonly known by the disputed domain name. Furthermore, a search of WIPO's Global Brand Database confirms that the Respondent holds no trademark registrations for any of these terms.<sup>3</sup>

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<sup>3</sup>Noting in particular the general powers of a panel articulated inter alia in paragraphs 10 and 12 of the UDRP Rules, it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision. [WIPO Overview 3.0](#), section 4.8.

The Panel further observes that the website associated with the disputed domain name purports to offer for sale likes or followers for the Complainant's social media platforms, as well as for other third-party platforms, including TikTok and Twitter. The site provides no information regarding its owner or the owner of the disputed domain name, and contains various expressions suggesting affiliation with the Complainant's platform, such as references to Facebook Marketing principles. According to the evidence provided by the Complainant, the site prominently displayed, alongside references to the FACEBOOK mark, several depictions similar to the Thumb-up mark, as well as references to other third parties' registered and well-known trademarks, although the images of the Complainant's figurative trademarks appear to have been removed. Under these circumstances, the Respondent's website cannot be considered a bona fide offering of goods or services under the Policy, as it intentionally creates confusion or association with the Complainant, its trademarks, and social media platforms, and leverages the reputation of the FACEBOOK mark to drive traffic to the Respondent's website. To the extent that the Respondent may be considered as a service provider of the type addressed in [WIPO Overview 3.0](#), section 2.8, the Panel considers that virtually none of the so-called Oki Data criteria (set forth in *Oki Data Americas, Inc. v. ASD, Inc.*, *supra*) for a bona fide offering of goods or services using a domain name containing a third-party trademark as a reseller, distributor, or service provider are satisfied (arguably only the first criterion). See [WIPO Overview 3.0](#), section 2.8.

Additionally, the Panel finds that the sale of fake likes or followers for social media platforms—mostly generated automatically or artificially through technical means or via fake accounts—although common, is not entirely legitimate, as it may be misleading. Such artificially generated popularity may mislead users, creating an unfounded sense of confidence that could adversely affect their decision-making, including economic or commercial decisions. As correctly noted by the Complainant, prior decisions under the Policy have addressed this issue, concluding that such activities are likely or potentially prejudicial both to Internet users and to social media platform owners, and therefore may not be considered a bona fide offering of goods or services. See, e.g., *Meta Platforms, Inc. v. Dave Anothu, Influenceurs LTD*, *supra*; *Instagram, LLC v. 赵坤 (Zhao Kun)*, *supra*; or *Meta Platforms, Inc. v. Whols Protected*, WIPO Case No. [D2022-4370](#).

The Panel notes that the Respondent's website includes a non-prominent disclaimer in the footer, and that the Respondent's apparent reaction to the Complainant's cease-and-desist communication or to the Complaint was to remove the images that reproduced versions of the Complainant's figurative marks in similar colors, replacing them with grey alert images. The Panel finds that these actions do not assist the Respondent.

A non-prominent disclaimer in small font at the bottom of the page is easily overlooked by Internet users and is insufficient to prevent misleading impressions. See, e.g., *Instagram, LLC v. Vu Ha*, WIPO Case No. [DIO2025-0010](#).

The Respondent's apparent reaction to the cease-and-desist communication and to the Complaint—failing to file a Response and merely deleting part of the website content—further corroborates the absence of any rights or legitimate interests in the disputed domain name.

Consequently, the Panel finds that the Respondent has not rebutted the Complainant's prima facie case, and 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.

Paragraph 4(b) of the Policy enumerates non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith; other circumstances may also be relevant in assessing whether a Respondent's registration and use of a domain name constitutes bad faith. [WIPO Overview 3.0](#), section 3.2.1.

In the present case, the Panel notes that the Complainant's trademarks are highly distinctive and globally renowned. The Panel further finds that both the composition of the disputed domain name, which incorporates the FACEBOOK mark, and the content of the Respondent's website, which intentionally generates confusion and targets the Complainant and its trademarks for commercial gain, together with all other circumstances of this case, indicate the registration and use in bad faith of the disputed domain name.

The Respondent's dubious activities on the website—purportedly selling unauthorized and artificially generated likes or followers for various social media platforms—as well as the apparent impersonation or passing off of the Complainant through the use of similar versions of the Complainant's figurative marks, references to its famous trademarks, and other indications of false affiliation (e.g., references to Facebook Marketing principles), corroborate the Respondent's bad faith under the Policy.

The Panel finds that the inclusion of content on the Respondent's website and the use of similar versions of the Complainant's figurative marks as part of an impersonation scheme cannot be justified by a disclaimer at the bottom of the site, which may easily go unnoticed by Internet users. Therefore, the Panel concludes that the disclaimer is insufficient to cure the Respondent's bad faith. See *Bayerische Motoren Werke AG v. Ralfs Liepins, Birojs 2B SIA*, WIPO Case No. [D2025-0067](#).

Furthermore, where the overall circumstances indicate the respondent's bad faith, the mere existence of a disclaimer cannot remedy such bad faith; in such cases, UDRP panels may interpret the use of a disclaimer as an acknowledgment that users may be confused. See, e.g., *CBOCS Properties, Inc. v. Kas Is*, WIPO Case No. [D2025-1419](#); *Instagram, LLC v. Protection of Private Person / Yuri Shemetilo / Olha Shostak*, WIPO Case No. [D2022-2832](#).

Therefore, having reviewed the record, the Panel finds that the Respondent's registration and use of the disputed domain name constitute bad faith under the Policy.

Therefore, on the balance of probabilities, taking into account all cumulative circumstances of this case, the Panel finds that the disputed domain name was registered with the intent to target the Complainant's famous trademark, seeking to create a false affiliation with the FACEBOOK mark to drive traffic for commercial gain.

Accordingly, having reviewed the record, the Panel finds that the Respondent's registration and use of the disputed domain name constitute bad faith under the Policy. The Complainant has therefore 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 <comprarlikesenfacebook.com> be transferred to the Complainant.

/Reyes Campello Estebarez/

**Reyes Campello Estebarez**

Sole Panelist

Date: September 30, 2025