

## ADMINISTRATIVE PANEL DECISION

Carvana, LLC v. tou tou  
Case No. D2025-4045

### 1. The Parties

Complainant is Carvana, LLC, United States of America (the “United States”), represented internally.

Respondent is tou tou, United States.

### 2. The Domain Names and Registrar

The disputed domain names <carvanaaeo.com>, <carvanaeus.com>, <carvanafkw.com>, <carvanafw.com>, <carvanagoe.com>, <carvanagxh.com>, <carvanahet.com>, <carvanakga.com>, <carvanalaw.com>, <carvananve.com>, <carvanaorex.com>, <carvanaose.com>, <carvanaosg.com>, <carvanapso.com>, <carvanatja.com>, <carvanause.com>, <carvanne.com>, and <carvanremote.com> are registered with Gname.com Pte. Ltd. (the “Registrar”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 2, 2025. On October 3, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On October 6, 2025 and October 12, 2025, the Registrar transmitted by email to the Center its verification responses disclosing registrant and contact information for the disputed domain names that differed from the named Respondent (Redacted for Privacy) and contact information in the Complaint. The Center sent email communications to Complainant on October 8, 2025 and October 13, 2025, providing the registrant and contact information disclosed by the Registrar and inviting Complainant to submit an amendment to the Complaint. Complainant filed the first amended Complaint on October 9, 2025 and the second amended Complaint on October 13, 2025.

The Center verified that the Complaint together with the first amended Complaint and the second 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 Respondent of the Complaint, and the proceedings commenced on October 17, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 6, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on November 7, 2025.

The Center appointed Jeffrey D. Steinhardt as sole panelist in this matter on November 13, 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

Complainant operates a well-known online used car retailer. Complainant is listed on the New York Stock Exchange (since 2017) and was named to the *Fortune 500* in 2021. Complainant's operations are widespread across the United States and offer a variety of options and services through Complainant's public website at "www.carvana.com".

Complainant owns several registrations for its CARVANA trademarks including for example: United States Trademark Registration No. 4,328,785, registered in International Classes 35 and 36 on April 30, 2013; United States Trademark Registration No. 5,022,315, registered in International Class 39 on August 16, 2016; and the stylized CARVANA word mark, United States Trademark Registration No. 6,037,292 registered in International Classes 35, 36 and 39 on April 21, 2020.

Dates of registration for the disputed domain names are:

<carvanne.com>, October 26, 2023;  
<carvanaaeo.com>, <carvananve.com>, and <carvanaose.com>, July 14, 2025;  
<carvanapso.com> and <carvanremote.com>, August 9, 2025;  
<carvanagxh.com>, <carvanalaw.com>, and <carvanatja.com>, August 18, 2025;  
<carvanaeus.com>, September 1, 2025;  
<carvanakga.com> and <carvanause.com>, September 3, 2025;  
<carvanaosg.com>, September 10, 2025;  
<carvanagoe.com> and <carvanahet.com>, September 16, 2025;  
<carvanafkw.com>, September 18, 2025;  
<carvanafw.com>, September 24, 2025;  
<carvanaorex.com>, October 1, 2025.

The disputed domain names resolve or have resolved<sup>1</sup> as follows:

1. <carvanaaeo.com>, <carvananve.com>, <carvanaose.com> and <carvanne.com> redirected to websites that impersonated Complainant's main website at "www.carvana.com", using some of Complainant's images and the stylized CARVANA word mark. These websites, however, are now flagged by web browsers as "Dangerous Sites," allegedly found by the browser providers to have engaged in unlawful phishing.
2. <carvanaorex.com>, and <carvanaosg.com> currently host, and <carvanafw.com> used to host, homepage content mimicking Complainant's website; access to additional pages of these websites requires users to enter login credentials.
3. <carvanafkw.com>, <carvanagxh.com>, and <carvanalaw.com> previously hosted homepages that mimicked Complainant's homepage, but requiring login credentials to access additional pages on the site. These disputed domain names now resolve to inactive webpages.
4. <carvanahet.com>, <carvanapso.com>, <carvanatja.com>, <carvanause.com>, and <carvanremote.com> previously hosted homepages that mimicked Complainant's homepage, but now do not resolve to active webpages.
5. <carvanaeus.com>, <carvanagoe.com>, and <carvanakga.com> do not currently resolve to active webpages.

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<sup>1</sup> The Complaint annexes screenshots of some of the historical webpages to which the respective disputed domain names previously resolved before being transformed.

## **5. Parties' Contentions**

### **A. Complainant**

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain names.

Notably, Complainant contends that all of the disputed domain names either directly hosted or redirected to another URL that hosted a copycat Carvana website with content that infringed Complainant's intellectual property so as to appear as a legitimate website of Complainant. Complainant contends that Respondent is using the disputed domain names for phishing activities, attempting to collect personal data by requiring users to log into the websites presumably to obtain access to information and to Complainant's online business.

### **B. Respondent**

Respondent did not reply to 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 Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

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.

With the exception of the disputed domain names <carvanremote.com> and <carvanne.com>, the Panel finds that the CARVANA mark is fully included within the disputed domain names. With respect to <carvanremote.com> and <carvanne.com>, the Panel finds that the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms may bear on assessment of the second and third elements (here, a variety of brief letter strings nearly all having no apparent or obvious meaning), the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain names and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Panel finds that the first element of Policy paragraph 4(a) 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.

In the present case, Complainant has produced credible, unopposed evidence that all but three of the confusingly similar disputed domain names<sup>2</sup> have been used for websites impersonating Complainant's websites. The Panel agrees with Complainant that Respondent has made unauthorized use of Complainant's intellectual property, among other things, by prominently reproducing Complainant's United States-registered CARVANA logotype.

Complainant has also produced unopposed evidence supporting its allegations that several of the impersonating websites are being used in phishing schemes to harvest user credentials, email addresses, and possibly other personal data. The Panel also accepts Complainant's unopposed allegations that Respondent is not known by the disputed domain names and has no authorization to use Complainant's trademarks.

Having reviewed the available record, the Panel finds that Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain names. Respondent has not rebutted 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.

With respect to the disputed domain names <carvanaeus.com>, <carvanagoe.com>, and <carvanakga.com>, the three disputed domain names that have appear to have never resolved to active web pages, the Panel finds that Respondent's passive holding of those disputed domain names cannot be said to support rights or legitimate interests under these circumstances.

Panels have held that the use of a domain name for illegitimate activity (in this case, phishing, 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 that the second element of Policy paragraph 4(a) 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.

As elaborated below, the Panel concludes that Respondent intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with Complainant's mark in the sense of Policy paragraph 4(b)(iv) (examples of conduct supporting a finding of bad faith).

In the present case, the Panel notes that Respondent has since 2023 engaged in registration of a series of domain names that are confusingly similar to Complainant's well-known and long-established CARVANA trademarks; all but two of the disputed domain names wholly reproduce Complainant's trademark. The Panel finds that this series of eighteen domain name registrations strongly supports the conclusion that Respondent targeted Complainant's trademark and business.

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.

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<sup>2</sup> <carvanaeus.com>, <carvanagoe.com>, and <carvanakga.com>.

Panels have held that the use of a domain name for illegitimate activity (here, alleged phishing, 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 Respondent's registration and use of the fifteen disputed domain names that have resolved to websites that mimicked Complainant's website or infringed Complainant's intellectual property (listed in items 1 through 4 in the Factual Background above) constitutes bad faith under the Policy.

With respect to the remaining three disputed domain names (<carvanaeus.com>, <carvanagoe.com>, and <carvanakga.com>), panels have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of Complainant's trademark, and the composition of the disputed domain names, and finds that in the circumstances of this case the passive holding of the disputed domain names does not prevent a finding of bad faith under the Policy.

The Panel also finds, under the circumstances, that Respondent's failure to maintain accurate contact details in accordance with the registration agreement (e.g., the Center was unable to deliver notification of these proceedings by courier to Respondent's registrar-confirmed address) and Respondent's failure to respond to the Complaint are further evidence of bad faith.

The Panel finds that Complainant has established the third element of Policy paragraph 4(a).

## 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 <carvanaaeo.com>, <carvanaeus.com>, <carvanafkw.com>, <carvanafw.com>, <carvanagoe.com>, <carvanagxh.com>, <carvanahet.com>, <carvanakga.com>, <carvanalaw.com>, <carvananve.com>, <carvanaorex.com>, <carvanaose.com>, <carvanaosg.com>, <carvanapso.com>, <carvanatja.com>, <carvanause.com>, <carvanne.com>, and <carvanremote.com> be transferred to Complainant.

*/Jeffrey D. Steinhardt/*

**Jeffrey D. Steinhardt**

Sole Panelist

Date: November 18, 2025