

ADMINISTRATIVE PANEL DECISION

L'Oréal v. Asia GUL, ceravepakistan, Naeem Waqas
Case No. D2025-5452

1. The Parties

The Complainant is L'Oréal, France, represented by Dreyfus & associés, France.

The Respondents are Asia GUL, ceravepakistan, Pakistan, and Naeem Waqas, Pakistan, self-represented.

2. The Domain Names and Registrars

The disputed domain name <cerave-official.com> is registered with Tucows Domains Inc.

The disputed domain name <ceravepakistan.com> is registered with PDR Ltd. d/b/a PublicDomainRegistry.com.

The disputed domain name <ceravepakistan.online> is registered with GoDaddy.com, LLC (the "Registrars").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on December 31, 2025. On January 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names and one additional domain name. ¹ February 2 and 3, 2026, 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 Respondent (Privacy service provided by Withheld for Privacy ehf and Naeem Waqas) and contact information in the Complaint.

The Center sent an email communication to the Complainant on January 5, 2026 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar(s), 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 domain names are under common control. The Complainant filed an amended Complaint January 6, 2026.

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

¹The parties reached an agreement regarding the additional disputed domain name, after the proceedings were suspended from January 20, 2026 to February 16, 2026.

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 January 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was January 27, 2026.

The proceedings were suspended from January 20, 2026, to February 16, 2026. Afterwards, with the reinstatement of the proceedings, the new Response due date was February 23, 2026. One of the Respondent, the Response was filed with the Center on February 23, 2026.

On January 16, 2026 and February 11, 2026, the Complainant submitted a request for the addition of the domain name <ceravepakistan.online> to the current proceedings. On March 9, 2026, the Panel has decided to allow the additional domain name to the current proceedings.

The Center appointed Ganna Prokhorova as the sole panelist in this matter on March 2, 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, founded in 1909, is a French industrial group specialized in the field of cosmetics and beauty and is the first cosmetics group worldwide. The Complainant is today one of the world’s largest groups in the cosmetics business. It has a portfolio of 36 brands, employs 86,000 employees, and is present in 150 countries. The Complainant acquired the skincare brand CeraVe, which was founded in 2005 and offers a range of advanced skincare products.

The Complainant holds rights to the CERAVE trademark registrations worldwide, including, but not limited to, the following:

- International Trademark Registration No. 1365989, registered on June 15, 2017, in respect of goods in class 3;
- European Trademark Registration No. 016162752, registered on June 21, 2017, in respect of goods in class 3;
- Pakistani Trademark Registration No. 600258, filed on January 22, 2021, registration certificate dated April 10, 2023, covering goods in class 3.

The Complainant operates the domain names <cerave.fr> registered on July 19, 2017 and <cerave.com> registered on November 18, 2004.

The disputed domain names are: <ceravepakistan.com>, registered on April 22, 2025, <cerave-official.com>, registered on August 27, 2025, and <ceravepakistan.online>, registered on December 19, 2025.

As of the date of this Decision, the disputed domain names currently resolve to online stores that reproduce the Complainant’s CERAVE trademark and its visuals, offering cosmetic products under the Complainant’s trademark for sale with a discount. Additionally, all three websites, to which the disputed domain name resolve, feature customer reviews and copyright notice © 2026, CeraVe Pakistan or just © CeraVe Pakistan.

The Respondent, Naeem Waqas, Pakistan, alleges that it operates a business under the name THEORDINARYS (SMC-PRIVATE) LIMITED. The Respondent has also provided evidence of an alleged

Pakistan trademark application for designation,  No. 796579, allegedly filed on February 10, 2025, in respect of goods in class 3.

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.

Notably, the Complainant contends that:

(1) The disputed domain names are confusingly similar to the Complainant's trademark, since they incorporate the CERAVE mark in its entirety, and the addition of the geographical term "pakistan", or the generic and descriptive term "official" intersected by a hyphen, does not prevent a finding of confusing similarity with the Complainant's CERAVE trademark, which remains clearly recognizable. The addition of the terms ".com" and ".online" may also be disregarded for purposes of assessing confusing similarity, as they are viewed as standard registration requirements.

(2) The Respondent has no rights or legitimate interests in respect of the disputed domain names. The Respondent registered the disputed domain names years after the Complainant established and widely used the CERAVE trademark. The Respondent is not affiliated with the Complainant, has no license or authorization to use the CERAVE mark, and is not commonly known by "CERAVE". The disputed domain names resolve to a website that reproduces the Complainant's trademark and visuals of the official website, offering alleged CERAVE products for sale, which is not a bona fide offering of goods or services. In the communication between Parties, the Respondent stated his intention to "work with" the Complainant and explicitly requested the Complainant's permission and guidance on how to lawfully sell CERAVE products in Pakistan. Such correspondence constitutes a clear admission that the Respondent himself recognized that he did not possess any independent right, authorization, or entitlement to use the CERAVE trademark, including in domain names. Such conduct negates any claim of legitimate interest.

(3) The disputed domain names are registered and being used in bad faith. Registering the disputed domain name so obviously connected to a well-known CERAVE mark without authorization is itself evidence of bad faith. The disputed domain names resolve to nearly identical online stores offering cosmetic products and purporting to be affiliated with the Complainant. The websites systematically reproduce, without any authorization, the distinctive trademark CERAVE, together with the Complainant's official logo and an overall visual presentation closely mirroring that of the Complainant's legitimate websites. This deliberate imitation extends to the layout, branding elements, and commercial presentation, leaving Internet users with the false impression that the websites are official platforms operated, endorsed, or otherwise authorized by the Complainant, and constitutes bad faith under the Policy. This misleading scheme is further reinforced by the presence, at the bottom of the landing pages, of copyright notices. In addition, the websites prominently display customer reviews and marketing claims such as "Shop Authentic CeraVe Skincare in Pakistan", which explicitly assert the authenticity of the products and the supposed official status of the platform. This creates the illusion of legitimacy to reassure consumers that they are dealing with an authorized source. Additionally, the Respondent has relied on documentary evidence that is manifestly unreliable and appears to have been falsified, namely an alleged business registration certificate and a fake trademark certificate purportedly supporting his claimed rights in the disputed domain names.

The Complainant asks the disputed domain names be transferred.

B. Respondent

The Respondent, Naeem Waqas, contends that the Complaint is unfounded and that the requirements of paragraph 4(a) of the Policy have not been satisfied. The Response relates to <ceravepakistan.com> only.

In particular, the Respondent submits that:

(1) the disputed domain name <ceravepakistan.com> does not infringe the Complainant's trademark rights nor create a likelihood of confusion. The inclusion of the geographic term "Pakistan" in the disputed domain name serves to distinguish it and indicates a regional focus, thereby avoiding any implication of affiliation with the Complainant;

(2) the Respondent has rights and legitimate interests in the disputed domain name <ceravepakistan.com>, which is used in connection with a bona fide business offering skincare products legally sourced and marketed to consumers in Pakistan. The Respondent states that such use is consistent with standard commercial practices and does not seek to mislead consumers or unfairly capitalize on the Complainant's reputation. The Respondent emphasizes that it has applied for registration of the trademark "CeraVe Pakistan" in Pakistan. The Respondent argues that, under applicable national rules, it is entitled to use the mark pending registration, which demonstrates a legitimate interest and good faith use of the disputed domain name;

(3) the Respondent denies that the disputed domain name <ceravepakistan.com> was registered or used in bad faith. It submits that it was registered for a legitimate business operated under THEORDINARYS (SMC-PRIVATE) LIMITED, not to profit from the Complainant's mark or prevent its use. The Respondent asserts that the disputed domain name is used for bona fide commercial activities targeting Pakistan, that the term "Pakistan" distinguishes it from the Complainant, and that its pending trademark application for "CeraVe Pakistan" supports good faith. The Respondent further denies any intent to mislead consumers or exploit the Complainant's reputation.

Consequently, the Respondent asks that the Complaint should be dismissed in full with respect to <ceravepakistan.com>.

No arguments were raised by the Respondent with regard to the disputed domain names <cerave-official.com> and <ceravepakistan.online>.

6. Discussion and Findings

6.1.1 Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally 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 Select UDRP Questions Edition 3.1 ("[WIPO Overview 3.1](#)"), section 4.11.2.

As regards common control, the Panel notes that the disputed domain names:

(a) follow a similar naming structure incorporating the Complainant's CERAVE trademark with geographical or generic terms ("pakistan", "official");

(b) resolve to very similar websites displaying the Complainant's trademark and purportedly offering for sale the Complainant's products; and

(c) target the same market (Pakistan).

The Center has discharged its duties to notify the persons listed as registrants of the disputed domain names of the present Complaint, which have not objected to the consolidation request of the Complainant or to its arguments in support of the request.

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.

6.1.2. Consolidation: Addition of the disputed domain name

The Complaint was originally submitted regarding the disputed domain names <cerave-official.com> and <ceravepakistan.com>. On January 16, 2026 and February 11, 2026, the Complainant submitted a request to add the domain name <ceravepakistan.online> to the current proceedings.

It is up to the Panel to determine whether or not to accept the Complainant's request to add the domain name to the Complaint after the Respondent had been notified of the Complaint and the proceedings had formally commenced. See [WIPO Overview 3.1](#), section 4.12.2.

The Panel considers that it is reasonable to accept the addition of the additional disputed domain name to the Complaint as all disputed domain names involve the Complainants' trademarks and have been registered by the same Respondent within a short period.

While the Complainant submitted an amended Complaint including an additional disputed domain name, the Respondent did not provide any communication in response to such amendment, despite having had a reasonable opportunity to do so.

The Panel finds that the inclusion of the additional disputed domain name in the present proceedings is fair and equitable to all parties. Considerations of procedural efficiency also support, and in this case favour, such inclusion.

Therefore, the Panel accepts the consolidation of the disputed domain names to the present proceeding.

6.2. Substantive Issues

Paragraph 15(a) of the Rules provides that the Panel is to decide the Complaint on the basis of the statements and documents submitted in accordance with the Policy, the Rules, and any rules and principles of law that it deems applicable.

The onus is on the Complainant to make out its case and it is apparent, both from the terms of the Policy and the decisions of past UDRP panels, that the Complainant must show that all three elements set out in paragraph 4(a) of the Policy have been established before any order can be made to transfer the disputed domain name. In UDRP cases, the standard of proof is the balance of probabilities.

To succeed in a UDRP complaint, the Complainant has to demonstrate that all the elements listed in paragraph 4(a) of the Policy have been satisfied, namely:

(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 Panel has reviewed the entire case file and the evidence provided. The Panel is also guided, where pertinent, by the WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), which reflects consensus positions of UDRP panels on many common issues. The Panel will make reference to these consensus views in the analysis below as applicable.

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 mark and the disputed domain name. [WIPO Overview 3.1](#), section 1.7.

Based on the evidence submitted by the Complainant, the Panel finds that the Complainant has shown rights in respect of its CERAVE mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds that the Complainant’s mark is recognizable within the disputed domain names. The disputed domain names incorporate the Complainant’s CERAVE mark in its entirety, with the only differences being the addition of the geographical term “pakistan” and the generic and descriptive term “official” intersected by a hyphen. In accordance with [WIPO Overview 3.1](#), section 1.8, the addition of other terms, whether descriptive, geographical, pejorative, meaningless, or otherwise, would not prevent a finding of confusing similarity under the first element, as the Complainant’s mark remains clearly recognizable within the disputed domain names.

The Panel further notes that the generic Top-Level Domain (“gTLD”) “.com” and new gTLD “.online” are generally ignored for the purposes of comparison of the Complainant’s mark to the disputed domain names. [WIPO Overview 3.1](#), sections 1.11.1 and 1.11.2.

Accordingly, the Panel concludes that the disputed domain names are confusingly similar to the Complainant’s mark and that the first element of paragraph 4(a) of the Policy is satisfied.

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 3.1](#), section 2.1.

Having reviewed the record, the Panel finds that the Complainant has made a prima facie showing that the Respondent lacks rights or legitimate interests in the disputed domain names.

The Complainant has established rights in the CERAVE trademark and confirms that it has no business or other relationship with the Respondent. The Complainant has not authorized, licensed, or otherwise permitted the Respondent to use its mark. Furthermore, there is nothing in the record to suggest that the Respondent is commonly known by the disputed domain names or any corresponding name under

paragraph 4(c)(ii) of the Policy. The Respondent's earlier communication to the Complainant, in which he apologized and sought permission to sell CERAVE products, further indicates that he did not believe he possessed any independent rights to use the mark.

The Respondent has submitted an alleged business registration certificate regarding THEORDINARYS (SMC-PRIVATE) LIMITED. Even assuming that the Respondent holds a valid business registration, it does not demonstrate that the Respondent was commonly known by the disputed domain names.

The Respondent has submitted an alleged Pakistani trademark application as evidence of its rights. However, the document contains a number of inconsistencies which call into question its reliability. While the designation is presented in a certain form, the description of the mark does not clearly correspond to it, creating ambiguity as to the scope of the claimed sign. In addition, the reference to the applicant is unusual, as it identifies an individual "trading as" a designation, remarkably also in all of its design elements including capitalization and color, identical to a well-known brand, rather than a clearly established legal entity holding independent rights. This further raises concerns as to the bona fide nature of the filing. Accordingly, the Panel does not consider that this supports the Respondent's claims.

The evidence before the Panel shows that the disputed domain names wholly incorporate the Complainant's CERAVE trademark and are used to impersonate the Complainant. The Respondent's websites reproduce the Complainant's trademark, logo, and the overall presentation of the Complainant's official website, offering alleged CERAVE products for sale. At the time of this Decision, the disputed domain names resolve to websites presenting the Complainant's products while prominently displaying the Complainant's branding, thereby creating a false impression of affiliation or endorsement. In particular given the composition of the disputed domain names, such use cannot constitute a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy, nor does it qualify as legitimate noncommercial or fair use without intent for commercial gain under paragraph 4(c)(iii). The manner in which the Respondent uses the disputed domain names – and indeed their very composition, giving an inaccurate air of authenticity – indicates an intent to mislead consumers and to take unfair advantage of the Complainant's reputation rather than to pursue any legitimate business purpose even if the Complainant's products sold on the website to which the disputed domain name is directing Internet users would be genuine products.

According to the current state of UDRP decisions in relation to the issue of resellers as summarized in the [WIPO Overview 3.1](#), section 2.8.1, resellers, distributors, or service providers using a domain name containing the complainant's trademark to undertake sales or repairs related to the complainant's goods or services may be making a bona fide offering of goods and services and thus have a legitimate interest in such domain name. Outlined in the "Oki Data test", the following cumulative requirements will be applied in the specific conditions of a UDRP case: (i) the respondent must actually be offering the goods or services at issue; (ii) the respondent must use the site to sell only the trademarked goods or services; (iii) the site must accurately and prominently disclose the registrant's relationship with the trademark holder; and (iv) the respondent must not try to "corner the market" in domain names that reflect the trademark.

Even if the Respondent were offering the Complainant's genuine products, the Panel finds that the manner in which the Complainant's trademark and logo are used on the websites, combined with the absence of any clear and prominent disclaimer, creates a misleading impression of affiliation. Such use is likely to lead Internet users to believe that the websites are operated by, or at least affiliated with, the Complainant.

In view of the above, the Panel concludes that the the Complainant has satisfied the requirement of paragraph 4(a)(ii) of the Policy.

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 notes that the Respondent registered and is using the disputed domain names in bad faith under paragraph 4(b) of the Policy.

The Complainant is well known for being specialized in the field of cosmetics and beauty and is the first cosmetics group worldwide since 1909. The Complainant is best known for being one of the world's largest groups in the cosmetics business. The Complainant has also operated the domain name <cerave.fr> and <cerave.com>.

Given the Complainant's international reputation and the distinctive nature of its CERAVE mark, the Panel finds it implausible that the Respondent was unaware of the Complainant's rights. The websites associated with the disputed domain names display the Complainant's products and logo, while the disputed domain names themselves reproduce the CERAVE trademark in its entirety, merely adding geographical and generic terms, even in one case the word "official". This clearly demonstrates targeting of the Complainant's well-known brand. In accordance with section 3.2.1(i) of the [WIPO Overview 3.1](#), such composition strongly supports a finding of deliberate targeting.

By using the disputed domain names to operate websites that prominently display the Complainant's CERAVE trademark, logo, and product imagery, the Respondent has created a clear likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of those websites. Such conduct is inherently misleading and constitutes an intentional attempt to trade on the reputation and goodwill of the Complainant's well-known trademark. Under paragraph 4(b)(iv) of the Policy, intentionally attracting Internet users for commercial gain by creating such confusion is a classic indicator of bad faith use.

The Complainant further submits that the Respondent has been involved in prior proceedings. This supports a finding that the Respondent has engaged in a pattern of abusive domain name registrations targeting the Complainant's mark. In line with section 3.2.1 of the [WIPO Overview 3.1](#), such conduct is indicative of bad faith.

Considering the totality of circumstances, the Panel concludes that the disputed domain names were registered and are being used in bad faith under paragraph 4(a)(iii) of the Policy. Accordingly, the third element of paragraph 4(a) of the Policy has been established.

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 <cerave-official.com>, <ceravepakistan.com>, and <ceravepakistan.online> be transferred to the Complainant.

/Ganna Prokhorova/

Ganna Prokhorova

Sole Panelist

Date: April 3, 2026