

ADMINISTRATIVE PANEL DECISION

Onesto Labs Private Limited v. Alex Harrison
Case No. D2026-1369

1. The Parties

The Complainant is Onesto Labs Private Limited, India, represented by Saikrishna & Associates, India.

The Respondent is Alex Harrison, Ireland.

2. The Domain Name and Registrar

The disputed domain name <thebareanatomy.com> (the “Disputed Domain Name”) is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 31, 2026. On March 31, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On April 1, 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 (Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 2, 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 amended Complaint on April 7, 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 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 April 9, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 29, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on May 4, 2026.

The Center appointed Mariia Koval as the sole panelist in this matter on May 6, 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 2018, is an Indian private limited company engaged in the development, marketing, distribution, and sale of personal care and cosmetic products, including skincare, haircare, and allied consumer goods. The Complainant was initially engaged in a personalization-focused business model, wherein products and offerings were tailored to individual customer preferences, however in 2022, the Complainant strategically transitioned its business model and adopted a “House of Brands” model. Under this model, the Complainant owns, develops, and operates multiple distinct brands, each with its own identity, positioning, and target market.

The Complainant, under the brand BARE ANATOMY (the “BARE ANATOMY Trademark”) is committed to provide personalized and clean beauty solutions through data-driven tech and advanced scientific research. The BARE ANATOMY brand reached 20,000 customers organically within months of its launch. Currently, the Complainant’s products under the BARE ANATOMY Trademark are amongst the top five hair care brands in India.

The Complainant is the owner of a number of the BARE ANATOMY Trademark registrations throughout the world, among which are:

- Indian Trademark Registration No. 3974301, registered on October 15, 2018, in class 3;
- United Kingdom Trademark Registration No. UK00004099126, registered on December 6, 2024, in class 3;
- European Union Trade Mark No. 019104670, registered on May 17, 2025, in class 3.

The Complainant has built up a considerable online presence and is operating several domain names <bareanatomy.com>, <bareanatomy.co.uk>, <bareanatomy.in>, <bareanatomy.us>, containing the BARE ANATOMY Trademark. The Complainant has also made substantial investments to develop a strong presence online by being active on various social-media platforms, including Facebook, Instagram, YouTube and LinkedIn.

The Disputed Domain Name was registered on September 2, 2025. As at the date of issuing this Decision, the Disputed Domain Name resolves to the active website in Indonesian, hosting an online slot website. However, in accordance with evidence presented by the Complainant (Annex 11 to the Complaint) as at the date of filing the Complaint the Disputed Domain Name resolved to a website where the Respondent listed the Complainant’s products and includes an Affiliate disclosure referring to Amazon services.

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.

Notably, the Complainant contends that the Disputed Domain Name is confusingly similar to the Complainant’s BARE ANATOMY Trademark since the Disputed Domain Name reproduces the Complainant’s BARE ANATOMY Trademark in its entirety with the addition of the definite article “the” that does not alter any visual or phonetic or structural character of the Disputed Domain Name.

The Complainant further asserts that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name in view of the following:

- the Respondent has no proprietary or contractual rights in the Complainant's BARE ANATOMY Trademark in whole or in part;
- the Respondent is not commonly known by the Disputed Domain Name, nor does the Respondent engage in any business or commerce under the BARE ANATOMY Trademark;
- the Respondent listed the Complainant's products on the website under the Disputed Domain Name. The website's footer discloses participation in the Amazon Services LLC Associates program, which indicates that the Respondent stood to earn advertising fees from referrals;
- the Respondent was attempting to mimic the Complainant, which is likely to mislead Internet users into believing that there is an association between the Respondent's website and the Complainant.

The Complainant further claims that the Respondent registered and is using the Disputed Domain Name in bad faith based on the following.

The Complainant claims that the Respondent listed the Complainant's actual products on the website under the Disputed Domain Name and subsequently redirected the users to the e-commerce platform Amazon via affiliate links. It is, therefore, evident that the Respondent has registered the Disputed Domain Name with the *mala fide* intention to disrupt the Complainant's business by diverting the potential consumers who might be searching for the Complainant's products, to the Disputed Domain Name. The presence of the "Affiliate Disclosure" on the Respondent's website is insufficient to cure the Respondent's bad faith registration and use of the Disputed Domain Name. The Disputed Domain Name is confusingly similar to the Complainant's BARE ANATOMY Trademark and therefore creates initial interest confusion, attracting Internet traffic by falsely suggesting an official association with, or authorization from, the Complainant. As is evident, the Respondent is misappropriating the Complainant's goodwill to confuse the Internet users and generate unlawful commercial gains.

B. Respondent

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

6. Discussion and Findings

Under paragraph 4(a) of the Policy, a complainant to succeed must satisfy the panel that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which 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 was registered and is being 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 name. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Disputed Domain Name reproduces the Complainant's BARE ANATOMY Trademark in its entirety with addition of the article "the" and the generic Top-Level Domain ("gTLD") ".com". According to [WIPO Overview 3.1](#), section 1.8, where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element. Here, the addition of the article "the" to the BARE ANATOMY Trademark does not prevent a finding of confusing similarity.

Also, in accordance with [WIPO Overview 3.1](#), section 1.11.1, the applicable gTLD in a domain name (such as, ".com", ".club", ".nyc") is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test.

Accordingly, the Panel finds that the Disputed Domain Name is confusingly similar to the Complainant's BARE ANATOMY Trademark pursuant to paragraph 4(a)(i) of the Policy.

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 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. 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 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 concludes that there is no relation, disclosed to the Panel or otherwise apparent from the record, between the Respondent and the Complainant. The Respondent is not a licensee of the Complainant, nor has the Respondent otherwise obtained an authorization to use the Complainant's BARE ANATOMY Trademark. Moreover, there is no element from which the Panel could infer the Respondent's right over the Disputed Domain Name, or that the Respondent might be commonly known by the Disputed Domain Name.

The Panel is of the opinion that there is no evidence that the Respondent is using the Disputed Domain Name to offer bona fide goods or services or making a legitimate non-commercial or fair use. On the contrary, as at the date of this Decision, when accessed by the Panel, the Disputed Domain Name resolves to an active website in Indonesian hosting an online slot website.

Also, as at the date of filing of the Complaint the Disputed Domain Name resolved to the website which offered different hair care products under the BARE ANATOMY Trademark (Annex 11 to the Complaint). According to the [WIPO Overview 3.1](#), section 2.8.1, UDRP panels have recognized that 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" in *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#), the following cumulative requirements will be applied to 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.

As is seen from the circumstances of this case, the website under the Disputed Domain Name did not disclose any relationship between the Complainant and the Respondent. The whole design of the Respondent's website created a false impression that this website was one of the Complainant's official websites or related to the Complainant. Thus, the Respondent does not satisfy the conditions of the *Oki Data* test.

Moreover, in accordance with the [WIPO Overview 3.1](#), section 2.5.1, where a domain name consists of a trademark plus an additional term (at the second or top-level), UDRP panels have largely held that such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. The fact that the Respondent has incorporated the Complainant's BARE ANATOMY Trademark in its entirety in the Disputed Domain Name with the addition of the article "the" to the Complainant's BARE ANATOMY Trademark in the Disputed Domain Name, is further evidence, that the Respondent was well aware of the Complainant's BARE ANATOMY Trademark and business at the time of registration of the Disputed Domain Name and has done so for the only purpose of creating an impression that the Disputed Domain Name is connected with the Complainant's BARE ANATOMY Trademark.

The Respondent did not file any response to the Complaint and did not participate in these proceedings, as such, the Respondent did not present any evidence supporting any rights or legitimate interests in the Disputed Domain Name.

In light of the above, the Panel finds that the Respondent has no rights or legitimate interests in the Disputed Domain Name. Therefore, the second element of the paragraph 4(a) of the Policy has been met by the Complainant.

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 concludes that the Disputed Domain Name was registered and is being used in bad faith in view of the following. The Complainant obtained the registration of the BARE ANATOMY Trademark more than six years earlier than the Respondent registered the Disputed Domain Name in 2025. Taking into account all circumstances of this case, the Panel finds that the Respondent was very well aware of the Complainant's business and its BARE ANATOMY Trademark when registering the confusingly similar Disputed Domain Name that completely incorporates the Complainant's BARE ANATOMY Trademark.

Previous resolving of the Disputed Domain Name to a commercial website which offered the Complainant's products under the BARE ANATOMY Trademark without any indication of connection to the Complainant is a clear indication that the Respondent intentionally attempted to attract, for commercial gain, Internet users to its own website by creating a likelihood of confusion with the Complainant's BARE ANATOMY Trademark as to the source, sponsorship, affiliation or endorsement of this website. The presence of the "Affiliate Disclosure" on the Respondent's website was insufficient to cure the Respondent's bad faith registration and use of the Disputed Domain Name. Such circumstances are evidence of registration and use of the Disputed Domain Name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

The current use of the Disputed Domain Name, particularly its resolving to an online slot website, further evidences the Respondent's bad faith. By using the Disputed Domain Name that incorporates the Complainant's BARE ANATOMY Trademark to redirect Internet users to an unrelated gambling platform, the Respondent is intentionally seeking to capitalize on the Complainant's reputation and goodwill, likely creating a false impression of association, sponsorship, or endorsement for commercial gain.

Furthermore, the underlying beneficial registrant's use of a proxy service to obscure its true identity further evidences bad faith registration and use of the Disputed Domain Name. In accordance with section 3.6 of the [WIPO Overview 3.1](#), there are recognized legitimate uses of privacy and proxy registration services; the circumstances in which such services are used, including whether the respondent is operating a commercial and trademark-abusive website, can however impact a panel's assessment of bad faith. The Panel considers that, taking into account all circumstances of this case, the Respondent's use of privacy service also constitutes further evidence of bad faith registration and use of the Disputed Domain Name.

In light of the above, the Panel finds the third element 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 Name <thebareanatomy.com> be transferred to the Complainant.

/Mariia Koval/

Mariia Koval

Sole Panelist

Date: May 20, 2026