

ADMINISTRATIVE PANEL DECISION

Carvana, LLC v. Amol Pai, 3M Canada
Case No. D2026-1974

1. The Parties

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

The Respondent is Amol Pai, 3M Canada, Canada.

2. The Domain Name and Registrar

The disputed domain name <carvana-canada.com> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 7, 2026. On May 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 8, 2026, the Registrar transmitted by email to the Center its verification response, confirming that the Respondent is listed as the registrant and providing the contact details.

The Center verified that 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 Respondent of the Complaint, and the proceedings commenced on May 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 1, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on June 3, 2026.

The Center appointed Gustavo Patricio Gay as the sole panelist in this matter on June 11, 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 is a limited liability company incorporated in Arizona, United States. The Complainant operates an e-commerce platform for the purchase and sale of used automobiles, offering online vehicle dealership and financing services throughout the United States under the CARVANA mark. The Complainant conducts its core business operations through its primary website at <carvana.com>. According to the evidence on record, the Complainant is a Fortune 500 company and has expended substantial resources in promoting and building consumer recognition of its CARVANA brand.

The Complainant is the owner of several trademark registrations incorporating the CARVANA mark in the United States. For the purposes of these proceedings, the Panel notes in particular the following registrations: CARVANA, (i) Reg. No. 4328785, registered on April 30, 2013, for classes 35 and 36; (ii) Reg. No. 5022315, registered on August 16, 2016, for class 39; (iii) Reg. No. 6037292, registered on April 21, 2020, for classes 35, 36, and 39; and CARVANACARE, Reg. No. 4971997, registered on June 7, 2016, for class 36.

All of the above registrations substantially predate the registration of the disputed domain name.

The disputed domain name <carvana-canada.com> was registered on March 9, 2026, with the Registrar. As of the date of the Complaint and this Decision, the disputed domain name resolves to a website, built using the Registrar's website builder, which prominently displays the heading "Drive Your Dream Car Today", together with a contact form soliciting the name and email address of visitors. The website bears no disclaimer clarifying that it is unaffiliated with the Complainant.

The Respondent is identified as Amol Pai, associated with the organization name "3M Canada", reportedly located in Canada. The record does not indicate any relationship between the Complainant and the Respondent. The Respondent did not submit a Response.

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 its CARVANA trademark, in which it claims rights based on multiple United States registrations dating back to at least 2013. The Complainant asserts that the disputed domain name incorporates the CARVANA mark in its entirety, and that the addition of the geographic term "canada" does not distinguish the disputed domain name from the Complainant's mark but rather reinforces the association with it.

The Complainant further contends that the Respondent has no rights or legitimate interests in the disputed domain name, having never been authorized to use the CARVANA mark, not being commonly known by the disputed domain name, and having no plausible basis for its adoption given that CARVANA is an invented term with no independent meaning.

The Complainant additionally contends that the disputed domain name was registered and is being used in bad faith, submitting that the Respondent registered the disputed domain name with knowledge of the Complainant's well-known mark, and that the passive holding of the disputed domain name without any legitimate use further evidences bad faith.

The Complainant requests that the Panel order the transfer of the disputed domain name to the Complainant.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, for this Complaint to succeed in relation to the disputed domain name, the Complainant must prove each of the following, namely that:

- i. the disputed domain name is identical or confusingly similar to a 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 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 entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Disregarding the generic Top-Level Domain ("gTLD") ".com", the disputed domain name differs from the Complainant's CARVANA mark solely by the addition of a hyphen and the term "canada".

Although the addition of the term "canada" may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

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 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 Complainant asserts that it has not authorized, licensed, or otherwise permitted the Respondent to use the CARVANA mark or to register any domain name incorporating it, and that no relationship exists between the Parties. There is no evidence in the record suggesting that the Respondent has been commonly known by the disputed domain name or that the Respondent holds any trademark or other rights corresponding to it. The Registrar-disclosed information identifies the registrant as "Amol Pai", operating under the organization name "3M Canada", a name that bears no relation to the disputed domain name and provides no legitimate basis for the registration of a domain name incorporating the Complainant's CARVANA mark.

[WIPO Overview 3.1](#), section 2.3.

The record further shows that the disputed domain name currently resolves to a website displaying the heading "Drive Your Dream Car Today", together with "CARVANA CANADA", and a contact form soliciting the name and email address of visitors. The website bears no disclaimer clarifying its lack of affiliation with the Complainant. On the contrary, it bears a copyright notice in the footer in the name of "Carvana Canada". The use of a domain name that incorporates the Complainant's mark in its entirety, in connection with a website that collects personal data from Internet users without disclosing its true identity and presenting itself as affiliated with the mark's owner, does not constitute a bona fide offering of goods or services within the meaning of paragraph 4(c)(i) of the Policy, nor a legitimate noncommercial or fair use under paragraph 4(c)(iii). [WIPO Overview 3.1](#), section 2.2. The Panel further notes that the CARVANA mark is a coined term with no recognized meaning in the English language independent of the Complainant's brand, and the composition of the disputed domain name combining that trademark with a geographic term "canada", coupled with its use, could falsely suggest to Internet users the mistaken belief that they may find a Canada-based operator of the Complainant's services.

Panels have held that the use of a domain name for illegitimate activity, here passing off, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), 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 record shows that the Complainant's CARVANA trademark has been registered in the United States since April 30, 2013, and that the Complainant has continuously used the CARVANA mark in connection with its e-commerce platform for the purchase and sale of used automobiles since that date. The Complainant's trademark rights therefore substantially predate the registration of the disputed domain name on March 9, 2026, by a period of more than a decade. Given the long-standing and extensive use of the CARVANA mark, its recognition as a coined term, and its well-established reputation in connection with the Complainant's online automotive services, and the use to which the disputed domain name has been put, the Panel considers it inconceivable that the Respondent was unaware of the Complainant and its trademark at the time of registration of the disputed domain name.

As of the date of the Complaint and this Decision, the disputed domain name resolves to a website displaying the heading "Drive Your Dream Car Today" together with "CARVANA CANADA", and a contact form soliciting the name and email address of visitors. The website bears no disclaimer clarifying its lack of affiliation with the Complainant. On the contrary, it bears a copyright notice in the footer in the name of "Carvana Canada". The use of a domain name incorporating the Complainant's well-known mark in its

entirety, in connection with a website that collects personal data from Internet users who may reasonably believe they are interacting with the Complainant or an authorized affiliate, is apt to attract Internet users by creating a likelihood of confusion as to the source, sponsorship, or endorsement of the website. Such conduct falls squarely within paragraph 4(b)(iv) of the Policy.

Having reviewed the available record, the Panel notes the distinctiveness and well-known character of the Complainant's CARVANA trademark, the Respondent's adoption of that mark in its entirety together with a geographic term that could suggest an extension of the Complainant's business into Canada, the absence of any Response or credible explanation for the registration of the disputed domain name, and its use in connection with a website that impersonates the Complainant's automotive services brand and collects personal data from Internet users, and finds that such use is bad faith under the Policy.

Panels have held that the use of a domain name for illegitimate activity, here passing off, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name 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 name <carvana-canada.com> be transferred to the Complainant.

/Gustavo Patricio Giay/

Gustavo Patricio Giay

Sole Panelist

Date: June 25, 2026