

Domain Name Dispute Resolution Center (DNDRC)

Arbitration and Mediation Center

COMPLAINT PANEL DECISION

Case No. 2026-0012

Also in PDF C2026-0012

1. The Complainant

The Complainant is Norton Creams Limited having its office at Unit 301, IDA Industrial Park, Cork Road, Waterford, Ireland. The complainant has initiated the complaint via their authorized representative, SILKA AB having their office at Strandvägen 7A, 114 56 Stockholm, Sweden.

2. The Domain Name and Respondent

The domain name upon which the Complaint is based is <sudocrem.pk>, hereinafter referred to as the Disputed Domain Name [“the DDN”].

PKNIC has informed DNDRC that the DDN is registered by Abdul Rehman Azeem, with their address being Street #2 House #32 Abu Zahbi Road Babar Colony and that the email address provided at the time of registration of the DDN is nov.itech09@gmail.com.

3. Procedural History

DNDRC was informed of the Complaint against the Respondent in accordance with the PKNIC - Internet Domain Registration Policy upon receiving notification from the Complainant, on 03 March 2026. DNDRC completed an administrative review of the Complaint and communicated the same to the Complainant on 16 March 2026.

Upon the Complainant’s fulfillment of the procedural obligations on 25 March 2026, DNDRC formally requested the Respondent’s registration details from PKNIC on 06 April 2026. PKNIC provided the requested details on 07 April 2026.

DNDRC issued a formal notification of the dispute to the Respondent on 09 April 2026, enclosing a copy of the Complaint and a Response Form, informing the Respondent that failure to submit a Response within 10 days would result in the dispute proceeding ex parte.

The Complaint, along with all relevant material, was referred to the appointed arbitrator for review and decision on 24 April 2026.

Applying Paragraph 4(a) of the Rules for Uniform Domain Name Dispute Resolution Policy (the Rules), DNDRC appointed Mr. Muhammad Amaan Latif as the sole Arbitrator who has verified that the Complaint satisfies the formal requirements of the Policy and the Rules.

4. Factual Background

(a) Complainant

The Complainant's brief contentions are reproduced below:

The Complainant

- *The Complainant, Norton Creams Limited, is the owner of the SUDOCREM brand. The product's origins trace back to 1931, when Dublin-based pharmacist Thomas Smith developed a unique healing cream. Since 1950, the product has been marketed under the SUDOCREM name and has become widely known for soothing and protecting skin, including for conditions such as nappy rash, eczema and acne (among other minor skin conditions). The SUDOCREM brand has been commercially available for decades and has expanded internationally; it is now available in over 50 countries worldwide. **Annex 4.***
- *The Complainant maintains an extensive official online presence for the SUDOCREM brand through www.sudocrem.com and multiple country-specific websites. A number of these operate under country-code domain names (e.g.,) and provide product information and details of authorised distributors. **Annex 5.***
- *As noted in the previous section, the Complainant holds a large portfolio of SUDOCREM-formative trademark registrations which cover numerous jurisdictions. Copies of these registrations are attached as **Annex 3.***

- *Prior decisions under the UDRP and other domain name dispute resolution policies have recognised the widespread reputation of the SUDOCREM brand. See, for instance, Norton Creams Limited v. Muhammad Saeed, CAC-UDRP-107861 (2025) (), Norton Creams Limited v. Richard Bergeron, CAC-UDRP-107454 (2025) (), Tosara Pharma Ltd. v. Liu Fen, WIPO Case No. DCO2023-0011 (), Tosara Pharma Ltd. v. Carolina Rodrigues, Fundacion Comercio Electronico, WIPO Case No. D2022-5036 () and Forest Tosara Limited v. 王晓文 (Wang Xiao Wen), WIPO Case No. DCN2019-0008 (et al.). Copies of these decisions are attached as **Annex 6**.*
- *The Complainant further notes that SUDOCREM products are available for purchase by consumers located in Pakistan through various online retail platforms operating under the '.pk' domain space. Annex 7 includes screenshots of such availability, together with Pakistan-focused references to SUDOCREM, including an Urdu-language article, a review on a Pakistani website, a YouTube review by a local content creator, and commentary by a Pakistan-based medical practitioner. These materials demonstrate an established consumer market for, and public recognition of, the SUDOCREM brand in Pakistan, consistent with the decisions in **Annex 6**.*

Therefore, the Complainant seeks the following remedy:

Transfer of the domain name to the Complainant, Norton Creams Limited.

(b) Respondent

The Respondent has not submitted any response.

5. Jurisdiction

The Panel's jurisdiction over this dispute between the Complainant and the Respondent is established by virtue of the Internet Domain Registration Policy version 4.4 (2019-08-19) and the Rules.

The Respondent applied for and was granted registration of the DDN on the basis of these regulations, and has submitted to, the PKNIC - Internet Domain Registration Policy version 4.4 (2019-08-19) and the Rules and correspondingly to the arbitral jurisdiction of the DNDRC and its arbitration decisions.

6. Discussion and Findings

The decision of the dispute shall be addressed with respect to the following aspects:

- I. Identical or confusing similarity with a trademark or service in which the Complainant has rights (a UDRP criteria).
- II. Legitimate interest in the domain name (a UDRP criteria).
- III. Registration and use of the domain name in bad faith (a UDRP criteria).

I. Identical or confusing similarity to a trademark or service mark in which the Complainant has rights

The Complainant has made the following submissions:

The domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights

- *As set out in the Factual Grounds, the Complainant owns multiple SUDOCREM trademark registrations (both word and device marks) across numerous jurisdictions, including International Trademark No. 1573223 for SUDOCREM (device), which has subsequently designated Pakistan (Annex 3). The holding of a nationally registered trademark prima facie satisfies the requirement of having trademark rights for purposes of standing under the UDRP (see section 1.2.1 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions ('WIPO Overview 3.1')).¹ In addition, through decades of continuous use, the SUDOCREM mark has acquired substantial goodwill and recognition, and serves as a distinctive identifier of the Complainant's products.*
- *The Complainant submits that the Domain Name is identical/confusingly similar to the SUDOCREM mark. The Domain Name encompasses the SUDOCREM mark at the second level in full, without alteration or addition, which is sufficient to establish identity/confusing similarity (see the WIPO Overview 3.1, section 1.7). The '.pk' country-code extension forms a standard technical registration requirement and can be disregarded for the purposes of this element (see the WIPO Overview 3.1, section 1.11.1).*
- *Also see, for example, DNDRC Case No. C2022-0009 (<cerave.pk>): 'It is an established principle that the incorporation of a Complainant's trademark in full within a disputed domain name may be sufficient to establish confusing similarity between the mark and the disputed domain name. [/] The Complainant has provided sufficient information, including*

annexing evidence of the same, that the Complainant has rights in the trademark “CERAVE”. The addition of the ccTLD “.pk” would also not prevent the finding of confusing similarity.’

- *In view of the above, the Complainant requests that the Panel finds the Domain Name identical/confusingly similar to the SUDOCREM mark, in which the Complainant has rights, for the purposes of paragraph 4(a)(i) of the Policy.*

The Respondent has not submitted any response.

The Complainant contends, as the first ground of its contentions, that the DDN is identical or confusingly similar to its SUDOCREM trademark. For the purposes of paragraph 4(a)(i) of the Policy, the Panel undertakes a straightforward comparison between the Complainant’s trademark and the DDN to determine whether the mark is recognizable within the domain name.

The Panel notes that the Complainant owns multiple registered trademarks for SUDOCREM, including International Trademark No. 1573223 (device), which also designates Pakistan, thereby establishing trademark rights for the purposes of the Policy. The Panel further observes that such registered rights, supported by longstanding and continuous use, are sufficient to demonstrate the Complainant’s standing under paragraph 4(a)(i), in line with section 1.2.1 of the WIPO Overview 3.0. *See (VKR Holding A/S v. Li Pinglong, WIPO Case No. D2016-2269)*

The DDN incorporates the Complainant’s SUDOCREM trademark in its entirety at the second level, without any alteration or addition, under the country-code top-level domain “.pk.” As set out in section 1.7 of the WIPO Overview 3.0, where a domain name wholly incorporates a complainant’s trademark, such incorporation is generally sufficient to establish confusing similarity, and in cases such as the present, may even amount to identity.

The Panel also takes note of prior decisions of the DNDRC, including DNDRC Case No. C2022-0009 (<cerave.pk>), where it has been held that the full incorporation of a complainant’s trademark within a DDN is sufficient to establish confusing similarity.

Finally, the Panel observes that the country-code top-level domain “.pk” is a standard registration requirement and does not impact the assessment of confusing similarity, as per section 1.11.1 of the WIPO Overview 3.0.

Accordingly, the Panel finds that the DDN is identical to the Complainant’s SUDOCREM trademark and that the Complainant has satisfied paragraph 4(a)(i) of the Policy.

II. Legitimate interests in a domain name

As per paragraph 4(c), the UDRP requires the Respondent's claim to be of legitimate interest and shall be:

"proved based on all evidence presented" that "shall demonstrate" the Respondent's "rights or legitimate interests to the domain name for purposes of Paragraph 4(a)(ii). "

Paragraph 4(c) states that:

"(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

(ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or

(iii) you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue. "

The Complainant has made the following submissions:

The Respondent has no rights or legitimate interests in respect of the domain name

- *The Complainant submits that the Respondent lacks rights or legitimate interests in the Domain Name. Under paragraph 4(c) of the Policy, a respondent may demonstrate rights or legitimate interests in certain circumstances; however, none of those circumstances apply in this case. While the overall burden rests with the Complainant, panels recognise that proving a lack of rights may involve proving a negative. Accordingly, once a prima facie case is established, the burden shifts to the Respondent (see the WIPO Overview 3.1, section 2.1). The Complainant has established such a prima facie case here.*
 - *before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services;*

- *you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights;*
 - *you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.*
- *To the best of the Complainant's knowledge, the Respondent does not have trademark rights for, nor is it commonly known by, 'sudocrem' or any similar term. The Respondent is not connected to nor affiliated with the Complainant and has not received license or consent to use the SUDOCREM mark in any way.*
- *The Complainant submits that the Respondent has not used, nor prepared to use, the Domain Name in connection with a bona fide offering of goods or services, nor a legitimate non-commercial or fair use. The Domain Name resolves to a website that impersonates the Complainant by falsely presenting itself as an official SUDOCREM online store (**Annex 8**). The site prominently displays the Complainant's SUDOCREM logo and images of SUDOCREM-branded items offered at discounted prices. Indeed, the very first image presented to users can be found, among other places, on the official United States SUDOCREM site (compare page 1, **Annex 8** with page 8, **Annex 5**). Visitors are invited to select products, add them to a shopping cart, and proceed to checkout, which requires the submission of personal and contact information, including full name, address, phone and email (see page 10, **Annex 8**) – information capable of misuse if obtained under false pretences. This presentation and functionality are plainly designed to mislead internet users into believing that the website is operated by, or affiliated with, the Complainant, thereby inducing them to disclose such sensitive information. Such impersonation and passing-off conduct, amounting to copycat activity and phishing or fraud, can never confer rights or legitimate interests under the Policy (see the WIPO Overview 3.1, section 2.13.1: 'Panels have categorically held that the use of a domain name for illegal activity (e.g., the sale of counterfeit goods or (unlicensed) pharmaceuticals, phishing/identity theft, distributing malware, unauthorized account access/hacking, copycat sites, passing off, or other types of fraud) can never confer rights or legitimate interests on a respondent.').*
- *Even if the Respondent contends that it is acting as a reseller, such use fails to satisfy the cumulative Oki Data criteria (see the WIPO Overview 3.1, section 2.8.1). In particular, the Respondent has not accurately and prominently disclosed its lack of relationship with the Complainant (criterion 3). On the contrary, the repeated use of the SUDOCREM mark and product imagery, together with the footer statement '© Sudocrem 2026 [/] Built with love by*

Sudocrem’ (see circled at the bottom of page 6, Annex 8), reinforces the false impression that the website is operated by, or officially affiliated with, the Complainant. Accordingly, the Respondent cannot rely on any purported reseller defence to establish rights or legitimate interests. Any subsequent modification of the website content, including the addition of a disclaimer or removal of certain indicia of association, would not cure the Respondent’s prior impersonation nor retroactively confer rights or legitimate interests in the Domain Name.

- *Further, the composition of the Domain Name itself reinforces the absence of rights or legitimate interests. The Domain Name consists exclusively of the Complainant’s distinctive SUDOCREM mark under the ‘.pk’ country-code extension. Panels have recognised that domain names identical to a complainant’s trademark carry a high risk of implied affiliation (see the WIPO Overview 3.1, section 2.5.1). In the present case, internet users encountering <udocrem.pk> would naturally assume that it designates the Complainant’s official presence in Pakistan, particularly given that the Complainant uses domain names following the ‘SUDOCREM + ccTLD’ structure (e.g., <udocrem.co.uk> and <udocrem.com.au>) to establish its official online presence in countries of commercial interest (Annex 5). Such inherent risk of implied affiliation is incompatible with any claim to legitimate or fair use.*
- *The Complainant has presented a prima facie case that the Respondent lacks rights or legitimate interests in the Domain Name for the purposes of paragraph 4(a)(ii) of the Policy.*

The Respondent has not submitted any response.

The Complainant asserts that the Respondent has no rights or legitimate interests in the DDN, submitting that the Respondent is neither authorized to use the SUDOCREM trademark nor engaged in any bona fide or legitimate activity in connection with the DDN. The Respondent is not affiliated with the Complainant in any manner and has not been granted any license or consent, whether express or implied, to use the Complainant’s mark.

Under established UDRP practice, panels recognize that requiring a complainant to prove the absence of a respondent’s rights or legitimate interests would effectively amount to proving a negative. Accordingly, once a complainant establishes a prima facie case, the burden of production shifts to the respondent to demonstrate rights or legitimate interests under paragraph 4(c) of the Policy. In the present case, the Panel is satisfied that the Complainant has established such a prima facie case.

Firstly, the Panel finds that the Respondent’s use of the DDN does not constitute a bona fide offering of goods or services. Based on the information provided by complainant, the DDN

resolves to a website that impersonates the Complainant by presenting itself as an official SUDOCREM online store. The website prominently features the Complainant's SUDOCREM logo, product images, and branding, and invites users to purchase products and provide personal information, including contact and address details. Such conduct is clearly designed to mislead Internet users into believing that the website is operated by, or affiliated with the Complainant. (see WIPO Overview 3.0, section 2.13.1). See (*WIPO Case No. D2016-0581*, *WIPO Case No. D2025-0340*).

Secondly, there is no evidence that the Respondent is commonly known by the DDN within the meaning of paragraph 4(c)(ii) of the Policy. There is no indication that the Respondent holds any trademark rights in "sudocrem" or any similar term. The Respondent's use of the DDN does not establish any independent reputation separate from that of the Complainant.

Moreover, the composition of the DDN itself being identical to the Complainant's distinctive SUDOCREM mark under the ".pk" ccTLD carries a high risk of implied affiliation. As noted in section 2.5.1 of the WIPO Overview 3.0, such domain names inherently suggest a connection with the trademark owner see *WIPO Case No. D2016-2290*. In the present case, this risk is further heightened by the Complainant's established practice of using domain names in the format "SUDOCREM + ccTLD" for its official country-specific websites.

In light of the above, the burden of production has shifted to the Respondent to demonstrate any rights or legitimate interests in the DDN. The Respondent has failed to submit any response or evidence to rebut the Complainant's case.

Accordingly, the Panel finds that the Respondent lacks rights or legitimate interests in the DDN, and the Complainant has satisfied paragraph 4(a)(ii) of the Policy.

III. Registration and use in bad faith

The Complainant has made the following submissions:

The domain name was registered and is being used in bad faith

- *Under the Policy, bad faith is understood to occur where a respondent 'takes unfair advantage of or otherwise abuses a complainant's mark' (see the WIPO Overview 3.1, section 3.1). The Complainant submits that the Respondent has both registered and is using the Domain Name in bad faith, in accordance with paragraph 4(a)(iii).*

- *As set out in the Factual Grounds, the SUDOCREM mark has been used since 1950, is sold in more than 50 countries, and is supported by longstanding trademark registrations. Prior panels have acknowledged the reputation of the SUDOCREM mark. See, for example, Forest Tosara Limited v. 王晓文 (Wang Xiao Wen), WIPO Case No. DCN2019-0008 (<**sudocrem.cn**> **et al.**) ('The Panel finds that the Complainant has a widespread reputation in the SUDOCREM marks with regard to its products and services.');* and *Tosara Pharma Ltd. v. Liu Fen, WIPO Case No. DCO2023-0011 (<**sudocrem.co**>) ('The Panel notes the alleged continuous and extensive use of the SUDOCREM mark for over 70 years (since 1950), and its extensive presence over the Internet, as well as the reputation of this trademark recognized by previous decisions.').*
- *The Complainant further highlights that its SUDOCREM mark is readily identifiable in publicly accessible trademark databases (e.g., WIPO's Global Brand Database – Annex 9). Additionally, basic Google searches for 'sudocrem' – both prior to the Domain Name's registration on 2 January 2026 and as of 23 February 2026 – return results clearly associated with the Complainant and its SUDOCREM offerings (Annex 10). It is therefore evident that a basic trademark or internet search would have otherwise revealed the Complainant's rights in the SUDOCREM mark.*
- *The composition of the Domain Name itself reflects clear bad-faith targeting. The Domain Name consists exclusively of the Complainant's distinctive SUDOCREM mark under the '.pk' country-code extension, without any additional term or distinguishing element. The deliberate selection of the Complainant's mark in its entirety, combined with the country-code corresponding to Pakistan, demonstrates an intention to create the impression of an official national presence of the Complainant, consistent with the Complainant's established 'SUDOCREM + ccTLD' naming structure for a number of its official country websites (Annex 5). There is no plausible explanation for the Respondent's choice of this exact string other than to capitalise on the goodwill associated with the SUDOCREM mark.*
- *Further, as noted in the Factual Grounds, SUDOCREM products are available for purchase by consumers located in Pakistan through various online retail platforms (Annex 7). This confirms the existence of an established market for SUDOCREM goods in Pakistan and reinforces that the Respondent's registration of <**sudocrem.pk**> was not coincidental. The selection of the '.pk' extension in conjunction with the Complainant's mark strongly reinforces that the Respondent intentionally targeted internet users in Pakistan seeking the Complainant's products.*
- *The Respondent's conduct after the Domain Name's hosting services were suspended further reinforces the inference of bad faith targeting at the time of registration. On 23 January*

2026, the Complainant requested suspension of the infringing content. The hosting provider then associated with the Domain Name suspended the services (see pages 5-8, Annex 11), which was reflected in the Domain Name's inactivity as of 25 January 2026. Thereafter, the Respondent migrated the Domain Name to a different hosting provider (see page 9, Annex 11) and restored materially identical website content to that which had previously been suspended (see Annex 8). The deliberate re-establishment of the same impersonating website, without any attempt to remedy the infringing presentation or include a clear and prominent disclaimer, underscores that the Respondent's original registration was undertaken with knowledge of, and intent to exploit, the Complainant's mark.

- The pattern of conduct is additionally evidenced by the contemporaneous registration of <**sudocrem.shop**> on 2 January 2026. That domain name incorporates the Complainant's SUDOCREM mark in its entirety and resolved to materially identical impersonating e-commerce content, being also hosted by the same provider of <**sudocrem.pk**> (both reflected the host 'HOSTINGER-HOSTING') (Annex 12). The <**sudocrem.shop**> domain was subject to the same takedown effort; it has since been suspended and remains inactive. The simultaneous registration of two domain names incorporating the Complainant's mark, coupled with identical website deployment, strongly indicates coordinated activity under common control and forms part of a broader scheme targeting the Complainant's goodwill. This conduct provides further corroborative evidence of bad faith registration of the Domain Name.
- Having established the matter of bad faith registration, the Complainant further asserts that the Respondent has used the Domain Name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy:
 - by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location.
- The Respondent's conduct falls squarely within the scope of paragraph 4(b)(iv) of the UDRP. As evidenced in Annex 8, the website to which the Domain Name resolves is clearly designed to impersonate the Complainant by presenting itself as an official SUDOCREM online store. The site prominently displays the Complainant's SUDOCREM logo, reproduces official product imagery (including images copied from the Complainant's own websites), and offers purported SUDOCREM products at discounted prices. It incorporates standard e-commerce

functionality, inviting users to select products, add them to a shopping cart, and proceed to checkout, prompting the submission of personal details.

- *This presentation is plainly intended to mislead internet users into believing that they are engaging with a website operated or authorised by the Complainant, and thus to create a likelihood of confusion as to source, sponsorship, affiliation, or endorsement for commercial gain. The absence of any disclaimer, together with the footer statement ‘© Sudocrem 2026 [/] Built with love by Sudocrem’, further reinforces the false impression of official status. Panels have consistently recognised that such impersonation, copycat activity, and phishing-style conduct constitute per se illegitimate activity and are manifestly recognised as evidence of bad faith under the Policy (see the WIPO Overview 3.1, section 3.1.4).*
- *Also see, for instance, DNDRC Case No. C2025-0019 (<ceravepakistan.pk>): ‘The Complainant also invokes paragraph 4(b)(iv) of the Policy, asserting that the Respondent’s use of a confusingly similar domain name directs users to a fraudulent website mimicking the Complainant. The Panel agrees that the DDN is confusingly similar to the “CERAVE” trademark and that such similarity is likely to mislead users. As held in MasterCard International Incorporated v. Wavepass AS, WIPO Case No. D2012-1765, and Edmunds.com, Inc. v. Triple E Holdings Limited, WIPO Case No. D2006-1095, such use may result in traffic diversion for commercial gain, particularly in the Pakistani market. [/] The Respondent’s use of the Complainant’s trademarked goods without disclosure reinforces the conclusion that the DDN was intended to impersonate the Complainant and disrupt its business for commercial benefit. Such conduct constitutes bad faith under the Policy (see GEA Group Aktiengesellschaft v. J.D., WIPO Case No. D2014-0357). Moreover, the absence of any legitimate interest further supports a finding of bad faith under paragraph 3.1.4 of the WIPO Overview.’*
- *In view of the foregoing, the Complainant requests that the Panel makes a finding of bad faith registration and use under paragraph 4(a)(iii) of the Policy.*

The Respondent has not submitted any response.

Under paragraph 4(b)(iv) of the UDRP Policy, a respondent is deemed to have registered and used a DDN in bad faith where it has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the complainant’s trademark as to the source, sponsorship, affiliation, or endorsement of the website or of the products or services offered thereon. The Panel finds this provision to be directly applicable in the present case, without prejudice to other indicia of bad faith apparent on the record.

As regards registration in bad faith, the Panel notes that the Complainant's SUDOCREM trademark is inherently distinctive and has acquired substantial reputation through continuous use since 1950 across numerous jurisdictions. The mark has been recognized in prior decisions as enjoying widespread goodwill and recognition. In light of such widespread recognition, the Panel finds it implausible that the Respondent registered the DDN without prior knowledge of the Complainant's trademark rights. (*See WIPO Overview 3.0 Section 3.2.2*) and (*WIPO Case No. D2016-1973*).

The Respondent's targeting of the Complainant is further evident from the composition of the DDN itself, which consists solely of the Complainant's SUDOCREM mark under the ".pk" country-code extension. The deliberate selection of the Complainant's mark in its entirety, combined with a country-code corresponding to Pakistan, reflects an intention to create the impression of an official presence of the Complainant in that jurisdiction. This is particularly persuasive given the Complainant's established practice of operating official websites under the "SUDOCREM + ccTLD" format. The Panel therefore finds no plausible explanation for the Respondent's choice of DDN other than to capitalize on the Complainant's goodwill.

The Panel also takes into account the Respondent's subsequent conduct, including the migration of the DDN to an alternative hosting provider following suspension and the reinstatement of materially identical website content. Such actions demonstrate a continued and deliberate effort to exploit the Complainant's mark and reinforce the inference that the DDN was registered with knowledge of, and intent to target the customers of the Complainant. Further, the contemporaneous registration of an additional domain name incorporating the Complainant's mark and resolving to similar content supports a finding of a broader pattern of abusive domain name registrations. See *WIPO Case No. D2025-0321*.

Turning to use in bad faith, the evidence shows that the Respondent has used the DDN to resolve to a website impersonating the Complainant by presenting itself as an official SUDOCREM online store. The website prominently displays the Complainant's trademark, reproduces official product imagery, and incorporates e-commerce functionality inviting users to purchase products and submit personal information, including contact and address details. The Panel finds that such conduct is clearly intended to mislead Internet users into believing that they are interacting with a legitimate website operated or authorized by the Complainant.

Such use falls squarely within paragraph 4(b)(iv) of the Policy, as it demonstrates an intentional attempt to attract Internet users for commercial gain by creating a likelihood of confusion as to source, sponsorship, affiliation, or endorsement. The Panel further notes that "commercial gain" under the Policy is not limited to direct monetary benefit but may include the collection of user

data, traffic diversion, or other indirect advantages, as reflected in WIPO Overview 3.0, section 2.5.3.

Moreover, the impersonation of the Complainant and the operation of a copycat website capable of collecting sensitive user information constitutes inherently illegitimate activity, which panels have consistently recognized as strong evidence of bad faith. The absence of any clear or prominent disclaimer, coupled with statements suggesting official affiliation, further reinforces the misleading nature of the Respondent's conduct. Even if a disclaimer were present, it would not be sufficient to cure the overall impression of association created by the Respondent's website.

The Panel also accepts that the Respondent's activities are likely to disrupt the Complainant's business by diverting consumers seeking genuine SUDOCREM products to an unauthorized platform, thereby undermining the Complainant's commercial operations and goodwill.

In the absence of any response or rebuttal from the Respondent, and having regard to the totality of the circumstances, the Panel concludes that the DDN was registered and is being used in bad faith. Accordingly, the Complainant has satisfied the third element of paragraph 4(a) of the Policy.

7. Decision

Upon reviewing the contentions and supporting evidence submitted by both Parties, the Panel finds that the Complainant has successfully established all elements required under the PKNIC - Internet Domain Registration Policy and the UDRP. The Panel recognizes that the "SUDOCREM" and "sudocrem.pk" mark is registered to the Complainant and the Respondent has no legitimate rights over it. Therefore, the continuous use of the DDN pertaining to the Complainant's registered trademark could result in hinderance in exercise of the rights of the Complainant in the trademark and could also jeopardize the reputation of the Complainant by amounting to confusion regarding the ownership of the DDN.

Taking all the discussion above into consideration, the Panel concludes and decides that:

1. The DDN is identical to the registered trademark of the Complainant;
2. The Respondent has no legitimate interest in the DDN;
3. The DDN was registered and is being used in bad faith by the Respondent.

Pursuant to Section 4 of the Policy, the Panel therefore directs that the registration of the DDN <sudocrem.pk> be transferred to the Complainant, as requested, within forty-eight (48) hours of receipt of this decision, either by email or through its publication on the official website

www.dndrc.com/cases_resolved/, whichever is earlier. The Complainant shall also remain entitled to approach PKNIC directly for enforcement of this decision.

Arbitrator: Muhammad Amaan Latif

Sole Panelist

Date: 29 April 2026