

ADMINISTRATIVE PANEL DECISION

ReflexAI, Inc. v. Alex Banks

Case No. DME2025-0018

1. The Parties

The Complainant is ReflexAI, Inc., United States of America (“United States”), internally represented.

The Respondent is Alex Banks, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <reflexai.me> is registered with NameSilo, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 11, 2025. On July 15, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 15, 2025, 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 (unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 30, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed amended Complaints on July 30, 2025.

The Center verified that the Complaint together with the amended Complaints 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 July 31, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 20, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 21, 2025. The Respondent sent an email communication to the Center on August 28, 2025.

The Center appointed Wilson Pinheiro Jabur as the sole panelist in this matter on August 28, 2025. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

According to the Complainant's website at "www.reflexai.com", the Complainant was created by Sam Dorison and John Callery-Coyne, two leaders at The Trevor Project, who "harnessing the power of large language models (LLMs) to automate and optimize training components", were able to empower "trainees to engage in highly realistic simulated conversations", having been "named to TIME's 100 Best Inventions of 2021".

The Complainant offers AI-powered simulation and quality assurance products since 2022 under the REFLEXAI brand.

In addition to the domain name <reflexai.com>, registered on April 5, 2017, which the Complainant uses as its official website, the Complainant is also the owner of the United States trademark application No. 99137435, for the word mark REFLEXAI, filed on April 15, 2025, claiming first use in commerce in September 2022 (Annex 3 to the Complaint).

The disputed domain name was registered on February 12, 2025, and presently does not resolve to an active webpage. The disputed domain name has been used in connection with a website that reproduced the Complainant's official website including the Complainant's mark and logo (Annex 2 to the Complaint).

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 trademark, creating a high risk of confusion, what is enhanced by the use made of the disputed domain name reproducing the Complainant's official website content, without any legitimate noncommercial or fair use basis.

The Complainant further asserts not to be affiliated with the Respondent in any way, not having authorized or licensed use of its mark, there also being no evidence that the Respondent is known by the disputed domain name or operates a bona fide business under that brand.

Lastly, the Complainant asserts that the Respondent has registered the disputed domain name in bad faith, likely with full awareness of the Complainant's existing trademark rights and established online presence; what is corroborated by the content hosted at the disputed domain name which mimics the Complainant's website in a manner that creates a strong likelihood of confusion, suggesting an intent to mislead users into believing the disputed domain name is affiliated with or endorsed by the Complainant, what is not true.

B. Respondent

The Respondent did not formally reply to the Complainant's contentions. On August 28, 2025, the Respondent sent an informal message to the Center stating that the "domain was already closed and no longer used. thank you."

6. Discussion and Findings

Paragraph 4(a) of the Policy sets forth three requirements, which have to be met for this Panel to order the transfer of the disputed domain name to the Complainant:

- (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 Complainant must prove in this administrative proceeding that each of the aforesaid three elements is present in order to obtain the transfer of the disputed domain name.

A. Identical or Confusingly Similar

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trademark and the disputed domain name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

The Panel finds the Complainant has established unregistered trademark or service mark rights for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.3.

The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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 a respondent lacks rights or legitimate interests in a domain name may result in the difficult task of "proving a negative", requiring information that is often primarily within the knowledge or control of the respondent. As such, where a complainant makes out a *prima facie* case that the respondent lacks rights or legitimate interests, the burden of production on this element shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name (although the burden of proof always remains on the complainant). If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

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.

In that sense, and according to the evidence submitted, the Complainant has made a *prima facie* case against the Respondent who has not been commonly known by the disputed domain name and is neither authorized or licensed, nor been allowed to use the Complainant's trademark, whether in the disputed domain name, or in any other way.

Also, the lack of evidence as to any trademarks registered by the Respondent corresponding to the disputed domain name, corroborates the indication of an absence of rights or legitimate interests in the disputed domain name.

Furthermore, according to the evidence submitted by the Complainant, the past use of the disputed domain name in connection with a website reproducing the contents of the Complainant's official website including the Complainant's mark and logo, does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use of the disputed domain name in these circumstances.

Under these circumstances and absent evidence to the contrary, the Panel finds that the Respondent does not have rights or legitimate interests with respect to the disputed domain name.

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.

This case presents the following circumstances which indicate under the balance of probabilities bad faith registration and use of the disputed domain name:

- a) the Complainant offers AI-powered simulation and quality assurance products since 2022 under the REFLEXAI brand, prior to the Respondent's registration of the disputed domain name;
- b) the Respondent has used the disputed domain name to reproduce the contents of the Complainant's official website including the Complainant's mark and logo;
- b) the disputed domain name is not only identical to the Complainant's trademark but is also very similar to the Complainant's domain name <reflexai.com>; and
- c) the Respondent has provided no evidence whatsoever of any actual or contemplated good faith use by it of the disputed domain name.

Although the disputed domain name is no longer active, the current non-use of the disputed domain name does not change the Panel's findings of the Respondent's bad faith.

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 <reflexai.me> be transferred to the Complainant.

*/Wilson Pinheiro Jabur/
Wilson Pinheiro Jabur
Sole Panelist
Date: September 3, 2025*