

ADMINISTRATIVE PANEL DECISION

Anshul Singhal v. Katie Kelly
Case No. D2026-1415

1. The Parties

The Complainant is Anshul Singhal, India, represented by Luthra & Luthra Law Offices, India.

The Respondent is Katie Kelly, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <ceoathlete.com> is registered with Bluehost Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 2, 2026. On April 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 2, 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 (“Perfect Privacy, LLC”) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 7, 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 the same date.

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 14, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 4, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 5, 2026.

The Center appointed David Taylor as the sole panelist in this matter on May 15, 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 an entrepreneur, fund manager, and business leader based in India. According to the Complainant, his combination of business acumen, entrepreneurial achievement, and leadership development forms the foundation of the “CEO Athlete” leadership development platform. The Complainant created the CEO Athlete leadership development platform to help emerging leaders and aspiring entrepreneurs, delivered through podcasts, guidebooks, e-books, newsletters, digital tools, practical frameworks, and downloadable resources.

The Complaint is based on various trademark applications for CEO ATHLETE filed before the Registrar of Trade Marks in India. The Panel has verified the status of each of the Complainant’s applications listed in the Complaint, all of which are pending save for the following, which has matured to registration:¹

- Indian Trademark No. 6883907,  ceo.athlete, filed February 28, 2025, and registered December 15, 2025.

The Complainant owns the domain names <ceoathlete.com>, <ceo-athlete.com>, and <ceoathlete.ai>. Each of these domain names resolves to a parking page.

The disputed domain name was registered on March 23, 2016. The disputed domain name currently resolves to a webpage displaying “Account Suspended”.

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.

The Complainant asserts rights in the trademark CEO ATHLETE. The Complainant submits that the disputed domain name is identical to the Complainant’s trademark.

The Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Complainant asserts that the Respondent has no credible or legitimate reason for adopting a domain name identical to the Complainant’s trademark. The Complainant claims that the Respondent is not commonly known by the disputed domain name and has not developed any website at the disputed domain name to date, suggesting a lack of legitimate interest in the disputed domain name. The Complainant asserts that the Respondent is not the owner of any right relating to the Complainant’s mark.

The Complainant submits that the disputed domain name was registered and is being used in bad faith. The Complainant observes that the Respondent has not created any website at the disputed domain name and submits that this can deceive the public and create confusion as to its association with the Complainant. The Complainant submits that the non-use of the disputed domain name does not prevent a finding of bad faith. The Complainant argues that the Respondent’s registration of the disputed domain name is a deliberate act of infringement and misrepresentation, intended for unlawful monetary gain and to mislead consumers.

¹ Noting in particular the general powers of a panel articulated inter alia in paragraphs 10 and 12 of the UDRP Rules, it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision, in particular to affirm or corroborate a party’s contention. This may include accessing trademark registration databases. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.8.

The Complainant further asserts that the Respondent's adoption of the disputed domain name is prejudicial to the interests of the Complainant and the public at large.

The Complainant requests transfer of the disputed domain name.

B. Respondent

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

6. Discussion and Findings

In order to prevail, the Complainant must demonstrate on the balance of probabilities that it has satisfied the requirements of paragraph 4(a)(i) of the Policy:

- (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 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 3.1](#), section 1.7.

While the Complainant's trademark applications would not by themselves establish trademark rights within the meaning of paragraph 4(a)(i) of the Policy, as noted above, one of the trademark applications relied on by the Complainant has matured to registration. [WIPO Overview 3.1](#), section 1.1.4. The Panel finds that the Complainant has established rights in the trademark CEO ATHLETE. See *Pepper Group Limited v. Domain Administrator, 1075 First Global Associates, LLC*, WIPO Case No. [D2016-0469](#):

"[...] the Complainant filed trade mark applications for PEPPER MONEY in August 2015 in Australia and the United States, and in November 2015 in the European Union, and subsequent to the filing of these proceedings its trade mark application for PEPPER MONEY in the European Union matured into a registration on March 28, 2016. While this occurred after the registration of the Disputed Domain Name, there is virtual unanimity among UDRP panels that the date when the Complainant acquires its rights is not relevant for the panel's consideration of this element. For purposes of this element, therefore, this Panel accepts that the Complainant has rights in the PEPPER MONEY mark."

To the extent that design (or figurative/stylized) elements would be incapable of representation in domain names, these elements are largely disregarded for purposes of assessing identity or confusing similarity under the first element. [WIPO Overview 3.1](#), section 1.10. The disputed domain name comprises the textual elements of the Complainant's trademark in their entirety, with no additional textual elements. The Panel finds that the Complainant's trademark is recognizable in the disputed domain name. Accordingly, the disputed domain name is identical or confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

In view of the Panel's findings under the third element below, the Panel does not consider it necessary to enter findings in respect of the second element of the Policy.

C. Registered and Used in Bad Faith

The Policy requires the Complainant to establish that the disputed domain name was both registered and has been used in bad faith. While a complainant may, for the limited purpose of the standing requirement under the first element, rely upon rights arising subsequent to the registration of the domain name, it is well settled that, aside from in certain limited circumstances where the facts of the case establish that the respondent's intent in registering the domain name was to unfairly capitalize on the complainant's nascent (typically as yet unregistered) trademark rights, a complainant will not succeed where the domain name predates any trademark rights upon which the complaint relies. [WIPO Overview 3.1](#), section 3.8.

In the present case, the disputed domain name was registered on March 23, 2016. The Complainant's case is based on Indian trademark applications for CEO ATHLETE, one of which has only recently matured to registration in 2025, nearly nine years after the disputed domain name was registered. No earlier registered rights are shown. The Complainant has not asserted nor demonstrated reputation in "CEO Athlete" at the relevant date. There is no indication of first use in commerce of the CEO ATHLETE mark, no material as to publicity, reach, or market presence, and no documentation from which awareness of the Complainant on the part of the Respondent might reasonably be inferred. The only evidence submitted by the Complainant regarding the Complainant's reputation focuses on the Complainant's role as managing director of a company that is not the subject of the present dispute. Against that background, the Complainant's assertion that the Respondent registered the disputed domain name in bad faith cannot be upheld and the Complaint must therefore fail. See *Philip Savino v. Cykon Technology Limited*, WIPO Case No. [D2020-1156](#):

"In the present case, however, the Respondent registered the disputed domain name more than 10 years before the Complainant registered the Trademark and at least seven years before the date of first use in commerce claimed in the United States Patents and Trademarks Office.

That gulf of time between the registration of the disputed domain name and the Complainant commencing use of the Trademark does not lend itself to those exceptional situations where Panels have been prepared to find registration in bad faith. [...]

Such scenarios include registration of a domain name: (i) shortly before or after announcement of a corporate merger, (ii) further to the respondent's insider knowledge (e.g., a former employee), (iii) further to significant media attention (e.g., in connection with a product launch or prominent event), or (iv) following the complainant's filing of a trademark application.'

The record in this proceeding does not suggest anything like those scenarios or other basis to depart from the usual rule.

Accordingly, the Complainant has failed to establish this requirement under the Policy and the Complaint must fail."

For completeness, the Panel finds that the absence of a website at the disputed domain name does not alter the analysis. Passive holding may, in appropriate cases, support an inference of bad faith where other indicia point clearly to targeting; however, no such indicia are present here. [WIPO Overview 3.1](#), section 3.3. The Panel further finds that the Complainant has failed to demonstrate that the disputed domain name is being used in bad faith.

The Panel finds the third element of the Policy has not been established.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

The mere lack of success in the complaint is not, on its own, sufficient to constitute Reverse Domain Name Hijacking. [WIPO Overview 3.1](#), section 4.16.

As noted above, the disputed domain name was registered on March 23, 2016, whereas the Complainant has sought to rely upon Indian trademark applications for CEO ATHLETE, one of which matured to registration only in 2025, nearly nine years after the Respondent registered the disputed domain name. No evidence of any earlier relevant rights, registered or unregistered, has been produced. On a plain reading of the Policy and well-established UDRP principles, the Complaint as filed lacked a reasonable prospect of success. The Complainant was represented by counsel and referred in its submissions to views as expressed in WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.1](#)") and prior decisions, which underscores that the determinative timing issue under the third element of the Policy should have been apparent. See *Philip Savino v. Cykon Technology Limited*, supra:

"[...] the long period of several years between the registration of the disputed domain name and subsequent commencement of use of the trademark by the Complainant (and even longer period before registration of the Trademark) should have made it very clear that the Complaint could not succeed. On the record in this case, the Complaint should never have been filed."

In these circumstances, the Panel finds that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The Panel therefore finds that the Complaint amounts to an attempt at Reverse Domain Name Hijacking.

7. Decision

For the foregoing reasons, the Complaint is denied.

/David Taylor/

David Taylor

Sole Panelist

Date: May 29, 2026