

ADMINISTRATIVE PANEL DECISION

Imelda Álvarez Estrada v. Stavrosa Fattas
Case No. D2026-2270

1. The Parties

The Complainant is Imelda Álvarez Estrada, United States of America, (“United States”) represented by Legarreta y Asociados SC, Mexico.

The Respondent is Stavrosa Fattas, Cyprus, represented by S.M. Parparinos & Partners LLC (Aliant Law Parparinos), Cyprus.

2. The Domain Name and Registrar

The disputed domain name <comply.academy> 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 27, 2026. On May 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 27, 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 (Registration Private/Domains By Proxy LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 28, 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 June 2, 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 June 3, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 23, 2026. The Response was filed with the Center on June 22, 2026.

The Center appointed Warwick A. Rothnie as the sole panelist in this matter on July 7, 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 the founder and Chief Executive Officer of Comply Academy. According to the Complaint the Complainant has more than 20 years of professional experience in the legal, integrity and compliance fields, providing consulting, training, and conference services internationally to a wide range of industries, business associations, chambers of commerce, and non-governmental organizations.

The Complainant was Legal Director and Compliance Officer at Sandoz Mexico, from 2007 to 2010. Then the Complainant was the Regional Compliance Officer at Novartis for Latin America and Canada from 2010 to 2018. The Complainant's qualifications include the iCECOM certification and the Internationally Certified Compliance Professional (ICCP) certification. The Complainant has completed specialized programs at the University of Miami. The Complainant is also a certified ISO 37001 auditor.

According to the Complaint, the Comply Academy operates in Mexico and the United States. In 2017, the Complainant registered the domain name <complyacademy.com>. Now, the Comply Academy promotes and provides its services from the website to which that domain name resolves. According to the website at the time this decision is being prepared, Comply Academy provides corporate integrity (ethics and compliance) training to transform organizational culture.

Some parts of the website are bilingual, being in both Spanish and English. The main parts of the website, including in particular those promoting the training programs on offer, are in Spanish only. While the link to the contact form is labelled in both Spanish and English ("Contacto/Contact"), the form itself is in Spanish. The telephone number is a Mexican listing and the office or academy address is in Mexico. The footer of the landing page states, "Comply Latam, S.C. Todos los derechos reservados Copyright © 2026." Similarly, the documents in Annex 7 to the Complaint, which are put forward as evidence of the Complainant's prior use of the Comply Academy mark in commerce, are also in Spanish. Not all the documents bear obvious dates, the oldest date being September 2020.

The website prominently features the logo:



This device is the subject of the Complainant's three registered trademarks:

- (1) Mexican Registered Trademark No 2396579 which was registered on May 17, 2022 in respect of a range of goods in International Class 16;
- (2) Mexican Registered Trademark No 2396580 which was also registered on May 17, 2022 in respect of a range of services in International Class 41; and
- (3) United States Registered Trademark No 8028018, which has been registered in the Principal Register since November 18, 2025 in respect of a range of consulting and educational services in International Classes 35 and 41.

The United States registration bears an endorsement that the colours red, white and black are claimed as a feature of the mark. There is also a second endorsement that "no claim is made to the exclusive right to use the following apart from the mark as shown: Comply Academy". The registration also claims that the class 35 services were first used in commerce in January 2024.

The details of the Mexican trademarks have been provided in Spanish and have not been translated into English.

According to the Whois report, the disputed domain name was registered on February 19, 2021.

The disputed domain name resolves to a website offering “leading industry training” in compliance. The website offers online courses leading to a number of certificates issued under the aegis of The Association of Governance Risk & Compliance such as a Certificate in Compliance through courses accredited by the London Institute of Banking and Finance (LIBF). Depending on the course, the price for enrolment is GBP350 or GBP750.

The landing page of the website bears a copyright notice “© Comply Academy Ltd” and amongst other things states that “Comply Academy is brand name of Comply Academy Ltd”.

Comply Academy Ltd is incorporated in the United Kingdom and has its offices in London. The Respondent incorporated Comply Academy Ltd in November 2022 and is the sole director and secretary.

The website bears alongside the logo of The Association of Governance Risk & Compliance a logo:



5. Discussion and Findings

Paragraph 4(a) of the Policy provides that in order to divest the Respondent of a disputed domain name, the Complainant must demonstrate each of the following:

- (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.

Paragraph 15(a) of the Rules directs the Panel to decide the Complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.

A. Identical or Confusingly Similar

The first element that the Complainant must establish is that the disputed domain name is identical with, or confusingly similar to, the Complainant's trademark rights.

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, ([“WIPO Overview 3.1”](#)), section 1.7.

The Complainant has proven ownership of the registered trademarks for the device set out above.

The comparison of the disputed domain name to the Complainant's trademark simply requires a visual and aural comparison of the disputed domain name to the proven trademarks. This test is narrower than and thus different to the question of “likelihood of confusion” under trademark law. Therefore, questions such as the scope of the trademark rights, the geographical location of the respective parties, the date they were acquired and other considerations that may be relevant to an assessment of infringement under trademark law are not relevant at this stage. Such matters, if relevant, may fall for consideration under the other elements of the Policy. See e.g. [WIPO Overview 3.1](#), section 1.7.

It is usual to disregard the design elements of a trademark under the first element as such elements are generally incapable of representation in a domain name. Where the textual elements have been disclaimed in the registration or cannot fairly be described as an essential or important element of the trademark, however, different considerations may arise. See for example, [WIPO Overview 3.1](#), section 1.10.

In the present case, exclusive rights over use of the words “Comply Academy” other than as part of the logo have been disclaimed in the United States registered trademark. The materials before the Panel do not indicate that a similar disclaimer was entered in the Mexican trademark registrations..

Given the absence of disclaimers from the Mexican registered trademarks and bearing in mind that the Complainant has apparently been using the domain name <complyacademy.com> for a number of years, the Panel is prepared to apply the usual rule.

Generally, it is permissible to disregard the Top Level Domain (TLD) component as a functional aspect of the domain name system. However, where the second level of the domain name and the TLD together comprise the relevant trademark, their combined effect may be taken into account when making the comparison. [WIPO Overview 3.1](#), section 1.11.

In this case, therefore, the disputed domain name consists of the relevant verbal component of the Complainant’s registered trademark.

Accordingly, the Panel finds that the Complainant has established that the disputed domain name is confusingly similar to the Complainant’s trademark and the requirement under the first limb of the Policy is satisfied.

B. Registered and Used in Bad Faith

In the circumstances of this case, it is appropriate next to consider the third requirement under the Policy.

Under the third requirement of the Policy, the Complainant must establish that the disputed domain name has been both registered and used in bad faith by the Respondent. These are conjunctive requirements; both must be satisfied for a successful complaint: see e.g. *Group One Holdings Pte Ltd v. Steven Hafto* WIPO Case No. [D2017-0183](#).

The Complainant contends that it is inconceivable that the Respondent was unaware of the Complainant’s trade mark when registering the disputed domain name because the combination of “Comply” and “Academy” is distinctive in the relevant industry and the Respondent is offering identical services to the Complainant. The Complainant further contends that, as the Respondent’s services are accessible in Mexico and the United States, there has been clear targeting of the markets in which the Complainant operates and enjoys protection. Further still, the Complainant contends that the Respondent has not provided a credible explanation for adopting the disputed domain name. Finally, the Complainant invokes the Respondent’s use of a privacy service as a further indicator of bad faith.

Panels do regularly infer knowledge of a prior trademark where the disputed domain name and the trademark are the same or confusingly similar. That is particularly so where the trademark is distinctive on the principle that the more distinctive the trademark the less likely the adoption of a confusingly similar domain name is a coincidence. In such a case, the resemblance usually calls for a convincing explanation of how the respondent came to adopt the domain name. The problem for the Complainant here, however, is that the words “comply” and “academy” are descriptive, or at least highly suggestive, of the relevant training services as shown by the disclaimer imposed on the United States registered trademark. Their combination may not be descriptive in Mexico where the Complainant’s business appears to be known as “Comply Latam” judging by materials included in Annex 7 to the Complaint. But the Respondent is providing a business based in London in the United Kingdom, where the composite expression is descriptive.

It is well-established that the global reach of the Internet means that the geographical separation of the Respondent from the Complainant's location does not provide an automatic defence to a claim of bad faith. [WIPO Overview 3.1](#), section 3.2.2. The relevance of geographical separation in a particular case requires consideration of a range of factors. These include the distinctiveness of the trademark, the nature of the services each party is offering, what if anything the Respondent has done such as offering the disputed domain name for sale at an inflated price or is carrying on what appears to be a genuine non-infringing business, whether or not there are other circumstances leading to an inference that the Respondent is seeking to trade on the reputation of the trademark and, no doubt, many other matters particular to the case in question.

It is possible that the Respondent was aware of the Complainant and her business in choosing the disputed domain name given the two businesses provide the same services. But the Complainant has not suggested that the Respondent has had any dealings with her or her business.

While the Complaint does claim that the expression has become closely associated with her services due to extensive and continuous use, international exposure and continuous use, the evidence supplied falls well short of what would be required to sustain that claim.

Further, as the Complaint itself states, the Complainant's Comply Academy operates in the United States and Mexico. The materials submitted in support of the Complaint relating to that business suggest it is essentially directed at professional audiences in Mexico and the Spanish speaking public in the United States. Those materials do not suggest that the Complainant is actively seeking custom in the United Kingdom or Cyprus in a way which would have lead compliance professionals in those jurisdictions, or those wishing to become compliance professionals there, would be aware of the Complainant's Compliance Academy. The Complaint does not include evidence that the Complainant advertised her Comply Academy in the United Kingdom or Cyprus for example.

The Respondent's website is accessible from the United States and Mexico. The Respondent's website does proclaim that the LIBF accreditation it offers is globally recognised. So, it is possible that someone from the United States or Mexico may choose to enrol in the Respondent's courses. The website on its face, however, does not appear to be directed at customers and potential customers in either the United States or Mexico. The pricing for example is in GBP. Of course, sophisticated members of the public in the United States or Mexico may well be prepared pay to enrol in courses being charged in GBP. Anecdotally, however, it is more usual for businesses targeting a market in the United States to specify prices in USD. Moreover, the Respondent's website does not include content in Spanish, which appears to be the language the Complainant expects her customers to be likely to use.

The Panel accepts that a privacy service can be used by the unscrupulous to conceal their identity. However, privacy services are offered by registrars almost as a matter of routine, often for no further charge. In this case, this particular allegation has even less force given there is an active website which clearly identifies the corporate entity claiming to offer the service and its association with relevant learned societies or professional organizations in the United Kingdom.

In these circumstances, the Panel does not consider it appropriate to infer that the Respondent was intending to take advantage of the Complainant's reputation in her trademark or the name "Comply Academy" when registering the disputed domain name.

Accordingly, the Complainant has not established that the disputed domain name was registered in bad faith.

As the Complainant has not established that requirement, it cannot establish the third requirement under the Policy and the Complaint must fail.

C. Rights or Legitimate Interests

As the Complaint must fail, no good purpose is served by addressing this requirement. The Panel notes, however, that the record contains evidence that the Respondent has operated a compliance-training business under the name “Comply Academy” and has used the disputed domain name in connection with that business.

D. Reverse Domain Name Hijacking

The Respondent invites the Panel to make a finding of reverse domain name hijacking as the Complaint “was brought in the face of a registered company name and visible legitimate business use of the domain, which the Respondent submits should have weighed heavily against filing.”

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 of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.1](#), section 4.16.

There is considerable force in the Respondent’s contention. On balance, however, the Panel does not consider a finding of reverse domain name hijacking is appropriate in this case. The Complainant owns trademark registrations for COMPLY ACADEMY, has used that designation in connection with compliance-training services, and was confronted with a domain name corresponding to that designation used in connection with similar services. Although the Complaint ultimately fails, the Panel is not persuaded that the Complaint was brought in bad faith or constituted an abuse of the administrative proceeding.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Warwick A. Rothnie/

Warwick A. Rothnie

Sole Panelist

Date: July 22, 2026