

ADMINISTRATIVE PANEL DECISION

Gambling Management S.A. v. Alexander Alexandrov
Case No. D2026-0922

1. The Parties

The Complainant is Gambling Management S.A., Belgium, represented by COGITUS SRL, Belgium.

The Respondent is Alexander Alexandrov, Kazakhstan.

2. The Domain Name and Registrar

The disputed domain name <circuscasinoeu.com> is registered with Hosting Concepts B.V. d/b/a Registrar.eu. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on March 4, 2026. On March 4, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 4, 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 and contact information in the Complaint. The Center sent an email communication to the Complainant on March 9, 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 amended Complaints on March 9, 2026, and March 16, 2026.

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 March 17, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 6, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 9, 2026.

The Center appointed Iris Quadrio as the sole panelist in this matter on April 16, 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 Gambling Management S.A., a Belgian company with its registered office in Liège, Belgium. The Complainant operates as a licensed online gambling and sports betting operator, providing its services primarily to Belgian consumers through the official website at the domain name <circus-casino.be>. The Complainant holds a Class A+ license issued by the Belgian Gaming Commission (License No. 20635) for online casino games in Belgium as an online extension of the land-based Casino de Namur, one of its establishment units.

The Complainant is the licensee of the CIRCUS and CIRCUS CASINO trademarks owned by Circus Belgium S.A., a related entity with its statutory office in Liège, Belgium. Circus Belgium S.A. has expressly authorized the Complainant to bring infringement proceedings on the basis of its trademark rights, including in the context of this proceeding. Circus Belgium S.A. is the owner of trademark registrations incorporating the CIRCUS and CIRCUS CASINO signs in multiple jurisdictions worldwide, including the European Union (“EU”), Benelux, the United Kingdom, France, Switzerland, Canada, Brazil, Colombia, Peru, Serbia, and Uruguay.

For the purposes of this proceeding, the Panel notes in particular the following EU figurative trademark registrations licensed to the Complainant: (i) EUIPO Registration No. 018025773, registered on October 20, 2020, for classes 9, 28 and 41; and (ii) EUIPO Registration No. 018544938, registered on March 10, 2022, for classes 9, 28 and 41. Both registrations substantially predate the registration of the disputed domain name.

The CIRCUS mark has been in continuous and extensive use in Belgium in connection with online gambling and casino services. Independent market research submitted in the record identifies CIRCUS as one of the leading online casino brands in Belgium, with approximately 745,000 monthly visits to its platform. An Ipsos Brand Health Tracking study conducted in early 2024 confirms that the CIRCUS mark is highly recognized among Belgian gamblers and is ranked among the top brands in terms of brand equity across all age groups surveyed. The mark has also been described by industry sources as the leading brand in the gambling sector in the Benelux countries.

In addition to the domain name <circus-casino.be>, Circus Belgium S.A. operates or authorizes the operation of other domain names incorporating the CIRCUS mark, including <circus.be>, <circuscasino.fr>, and <circus.nl>. The disputed domain name <circuscasinoeu.com> was registered on October 20, 2025.

According to the evidence on record, at the time the Complaint was filed, the disputed domain name resolved to an active website presenting itself as “Circus Online Casino” and reproducing the Complainant’s figurative CIRCUS trademark in a source-identifying position in the header of the page. The website was written entirely in French and explicitly targeted Belgian consumers. User interaction with the website’s core functional elements (including the registration button and game icons) did not lead to any genuine Circus-branded service. Instead, users were redirected to third-party gambling platforms through affiliate tracking URLs, including “koko.bet” and “vulkanspiele1.com”, via commission-based referral parameters. The Panel notes that at the time of this decision, the disputed domain name resolves to an active website that, although no longer displays the figurative mark, uses the CIRCUS and CIRCUS CASINO denominations in French, targeting Belgian consumers.

The Respondent is identified as Alexander Alexandrov, located in Kazakhstan. The record does not indicate any relationship between the Complainant and the Respondent, nor does it indicate that the Complainant or Circus Belgium S.A. have authorized the Respondent to register or use any domain name incorporating the CIRCUS mark.

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 CIRCUS and CIRCUS CASINO trademarks, in which it claims rights as licensee. The Complainant asserts that the disputed domain name reproduces the CIRCUS mark in its entirety, and that the addition of the terms "casino" and "eu" does not prevent a finding of confusing similarity but rather reinforces the association with the Complainant's online casino activities in the European Union.

The Complainant further contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name and that the Respondent is not related in any way to the Complainant. The Complainant states that it has not authorized, licensed, or otherwise permitted the Respondent to use its trademarks or to register any domain name incorporating them.

Moreover, the Complainant contends that the disputed domain name was registered and is being used in bad faith. In particular, the Complainant asserts that the website associated with the disputed domain name reproduced the figurative CIRCUS trademark and purported to offer Belgian online gambling services, including false claims of regulatory approval by the Belgian Gaming Commission and a fictitious partnership with a competitor. The Complainant further submits that users interacting with the website were redirected to unrelated third-party gambling platforms through affiliate tracking links, constituting a scheme of traffic diversion for commercial gain.

Finally, the Complainant requests that the Administrative 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 with a trademark or service mark in which the Complainant has rights; and
- ii) the Respondent has no rights or legitimate interest 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 record shows that the Complainant acts as licensee of the trademarks owned by Circus Belgium S.A., owner of registrations in multiple jurisdictions, including the European Union, all substantially predating the registration of the disputed domain name. As noted in [WIPO Overview 3.1](#), section 1.4.1, a trademark owner's licensee is considered to have rights in a trademark under the Policy for purposes of standing to file a complaint, provided that the existence of authorization to file is established. The record in this case includes an express authorization by Circus Belgium S.A. empowering the Complainant to bring infringement proceedings on the basis of the licensed marks.

The Panel finds the mark is recognizable 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 <circuscasinoeu.com> reproduces the CIRCUS trademark in its entirety. The disputed domain name further incorporates the term "casino", which directly corresponds to the Complainant's core business activity, and the geographical abbreviation "eu", which refers to the European Union, the territory in which the Complainant's licensed services are primarily offered.

Although the addition of other terms "casino" and "eu" may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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 neither it nor Circus Belgium S.A. has authorized, licensed, or otherwise permitted the Respondent to use the CIRCUS or CIRCUS CASINO marks or to register any domain name incorporating them. 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 available registrar information identifies the registrant as Alexander Alexandrov, a name that bears no correspondence to the disputed domain name. [WIPO Overview 3.1](#), section 2.3.

Furthermore, the evidence on record establishes that the disputed domain name resolved to a website that presented itself as "Circus Casino", reproduced the figurative CIRCUS trademark in a source-identifying

position, and was written entirely in French targeting Belgian consumers. The website falsely claimed to operate under a license granted by the Belgian Gaming Commission and to act in partnership with Golden Palace, a competitor of the Complainant in the Belgian gambling market. Neither representation was accurate. Such conduct cannot constitute a bona fide offering of goods or services within the meaning of paragraph 4(c)(i) of the Policy. [WIPO Overview 3.1](#), section 2.2.

The website is clearly commercial in nature and there is no evidence of any disclaimer, commentary, criticism, or other indication of legitimate noncommercial or fair use under paragraph 4(c)(iii) of the Policy.

Furthermore, as panels have consistently noted, where additional terms in a domain name directly evoke the complainant's field of activity or reinforce the geographic association with its operations, such additions are more likely to increase than to dispel confusion among Internet users. The Panel further notes that the combination of "circus", "casino", and "eu" in a single domain name is apt to create the impression that the disputed domain name refers to an official European Union extension or affiliate of the Complainant's well-known CIRCUS casino platform.

Panels have held that the use of a domain name for illegitimate activity or illegal activity, here, claimed impersonation, passing off, or other types of fraud 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, and according to the record, the Panel notes that the CIRCUS trademark portfolio of Circus Belgium S.A. substantially predates the registration of the disputed domain name, with registrations dating back to at least 1997 and continuous, extensive use in the Belgian online gambling sector thereafter. The disputed domain name was registered on October 20, 2025. Given the well-established reputation of the CIRCUS brand in Belgium at that time, the Panel considers it more likely than not that the Respondent was aware of the Complainant and its licensed CIRCUS-branded services at the time of registration. Independent evidence on the record confirms that CIRCUS ranks among the leading online casino brands in Belgium, with approximately 745,000 monthly visits, and enjoys very high brand awareness across Belgian gamblers as confirmed by an Ipsos Brand Health Tracking study conducted in early 2024. It is, in the Panel's view, wholly implausible that the Respondent selected the combination of "circus", "casino", and "eu" for an online gambling domain name by coincidence.

In addition, the manner in which the disputed domain name was used further reinforces this conclusion. The website at the disputed domain name reproduced the figurative CIRCUS trademark in a source-identifying position at the top of the homepage, adopted a look and feel calculated to evoke the Complainant's official platforms, and presented itself as a licensed Belgian online casino operating under authorization from the Belgian Gaming Commission. These representations were objectively false: no license of any kind has been granted to the Respondent by the Belgian Gaming Commission, and the Respondent has no connection to the Complainant or its licensor. The website also falsely claimed a partnership with Golden Palace, a direct competitor of the Complainant in the Belgian market. These false regulatory and commercial representations appear to have been plainly designed to mislead Belgian consumers into believing they were accessing an official CIRCUS-branded platform.

The Respondent's commercial purpose is confirmed by the monetization architecture of the website. User interaction with core functional elements (including the registration button and game icons) did not lead to any genuine Circus-branded service. Instead, users were redirected to unrelated third-party gambling platforms, including "koko.bet" and "vulkanspiele1.com", through affiliate tracking URLs embedding referral

and commission-tracking parameters. The disputed domain name thus functioned as a deceptive traffic-capture gateway, leveraging the Complainant's mark and goodwill to attract Belgian Internet users and divert them to third-party operators for commercial gain.

Such conduct falls squarely within paragraph 4(b)(iv) of the Policy, in that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the website and the services offered thereon.

Panels have held that the use of a domain name for illegitimate activity, including impersonation, passing off, and fraudulent diversion of Internet traffic, 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 further notes that, at the time of this decision, the disputed domain name no longer reproduces the figurative trademark but still continues to display the CIRCUS and CIRCUS CASINO denominations in French, targeting Belgian consumers without any authorization to do so. This continued use, absent any plausible legitimate explanation, reinforces the Panel's finding of 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 <circuscasinoeu.com> be transferred to the Complainant.

/Iris Quadrio/

Iris Quadrio

Sole Panelist

Date: April 30, 2026