

ADMINISTRATIVE PANEL DECISION

CIRCUS BELGIUM S.A. v. YURY ZANCHENKO, Krzysztof Sztrom, Volodymyr Oganessian, Oksana Homeniuk, and Nastia Sarachova
Case No. D2026-1999

1. The Parties

The Complainant is CIRCUS BELGIUM S.A., Belgium, represented by COGITUS SRL, Belgium.

The Respondents are YURY ZANCHENKO, Ukraine, Krzysztof Sztrom, Poland, Volodymyr Oganessian, Ukraine, Oksana Homeniuk, Ukraine, and Nastia Sarachova, Ukraine.

2. The Domain Names and Registrars

The disputed domain name <casino-circus.com> is registered with Name.com, Inc. The disputed domain names <casinocircus.net>, <circus-casino.net>, and <circus-casino.org> are registered with Dynadot Inc. The disputed domain name <circus-casinos.org> is registered with NameCheap, Inc. (collectively, the “Registrars”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 8, 2026. On May 8, 2026, the Center transmitted by email to the Registrars requests for registrar verification in connection with the disputed domain names. On May 8 and May 11, 2026, the Registrars transmitted by email to the Center their verification responses, disclosing registrant and contact information for the disputed domain names which differed from the named Respondents (Redacted for Privacy, Domain Protection Services, Inc.; Dynadot Privacy Service, Super Privacy Service LTD c/o Dynadot; and Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 18, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on May 20, 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 Respondents of the Complaint, and the proceedings commenced on June 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 22, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on July 9, 2026.

The Center appointed Peter Burgstaller as the sole panelist in this matter on July 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 a Belgium incorporated company; it owns numerous trademark registrations containing the mark CIRCUS, inter alia

- United Kingdom trademark registration for CIRCUS CASINO (figurative), Reg. No. UK00906071914, registered on October 23, 2008;
- United Kingdom trademark registration for CIRCUS (word), Reg. No. UK00003849721, registered on February 24, 2023;
- Swiss trademark registration for CIRCUS (word), Reg. No. 816298, registered on June 24, 2024;
- European Union trademark registration for CIRCUS (word), Reg. No. 018670434, registered on November 7, 2022 (Annexes 3 and 4 to the Complaint).

The Complainant has also protected its logos  and  in various versions and jurisdictions as figurative trademarks (for example, European Union registrations Nos. 018025773 and 018544938, registered on October 20, 2020 and March 10, 2022, respectively, Annex 3 to the Complaint).

The Complainant has licensed its trademarks to Gambling Management S.A., the holder of licenses for online gambling and casino services in Belgium; Gambling Management S.A. provides its business website under the domain name <circus-casino.be> which was registered on January 21, 2010 (Annex 6 to the Complaint).

Further, the Complainant owns the domain name <circus.nl> (Annex 8 to the Complaint).

The disputed domain names were registered on: November 7, 2025 for the disputed domain name <casino-circus.com>, on November 17, 2025 for the disputed domain name <casinocircus.net>, on July 30, 2025 for the disputed domain name <circus-casino.net>, on July 2, 2025 for the disputed domain name <circus-casino.org>, and on November 13, 2025 for the disputed domain name <circus-casinos.org> (Annex 1 to the Complaint).

At the time of filing of the Complaint the disputed domain names resolved to websites displaying the Complainant's logos  or  and/or the Complainant's trademarks CIRCUS and/or CIRCUS CASINO together with game icons very similar to those of the Complainant's website; at least four of the websites at the disputed domain names also used the Complainant's logo/figurative mark as the website's favicon; a user accessing or interacting with the websites under the disputed domain names was redirected to third-party gambling platforms (Annexes 10, 12, 17 – 25 to the Complaint).

5. Parties' Contentions

A. Complainant

The Complainant asks for consolidating the disputes against different disputed domain name registrants in a single proceeding since there is a set of indicators that suggest that the disputed domain names were registered by the same entity.

The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain names.

Notably, the Complainant contends that each of the disputed domain names incorporates, in a clearly recognizable manner, the Complainant's CIRCUS trademark together with the term "casino"; the Respondents merely introduce insignificant variations consisting of hyphens, the removal of hyphens, pluralization, and minor rearrangements of the terms, such as "casino-circus", "circus-casino", "casinocircus" and "circus-casinos". Hence, the disputed domain names are confusingly similar to the Complainant's trademarks.

The Complainant notes that the Respondents do not have any rights or legitimate interests in the disputed domain names. The Respondents are not linked to the Complainant in any way whatsoever and have never been authorized by the Complainant to register domain names that are similar to its trademark. The Respondents are moreover not commonly known by or associated with the disputed domain names and do not use them for any bona fide offering of goods or services. The Respondents are using the Complainant's CIRCUS mark and CIRCUS CASINO branding to falsely present the websites at the disputed domain names as licensed online casinos and misleadingly redirect users to an unauthorized third-party gambling platform for commercial gain.

The Complainant alleges that the disputed domain names were registered and are used in bad faith by the Respondents. The disputed domain names were registered after the Complainant has established rights in the CIRCUS and CIRCUS CASINO marks; hence, also noting the composition and use of the disputed domain names, the Respondents must have been aware of the Complainant and its rights when registering the disputed domain names.

Finally, the Complainant notes that the Respondents are using the disputed domain names to intentionally attract Internet users, for commercial gain, by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation or endorsement of the websites. Internet users are led to believe that they are accessing official, licensed or authorized CIRCUS casino platforms, whereas the disputed domain names are not operated by, affiliated with, or authorized by the Complainant. The websites at the disputed domain names redirect users to unauthorized third-party gambling platforms which further confirms the Respondents' bad faith use of the disputed domain names.

B. Respondents

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

6. Discussion and Findings

6.1. Preliminary Issues

A. Location of Respondents

Under paragraph 10 of the Rules, the Panel is required to ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case, and that the administrative proceedings take place with due expedition.

Mailing addresses of the Respondents YURY ZANCHENKO, Volodymyr Oganessian, Oksana Homeniuk, and Nastia Sarachova are stated to be in Ukraine, which is subject to an international conflict at the date of this Decision, which may impact case notification. It is appropriate for the Panel to consider, in accordance with its discretion under paragraph 10 of the Rules, whether the proceedings should continue. The Panel is of the view that they should.

Further to the Rules, the Center transmitted its written communications to the Respondents and sent an electronic Notification of the Complaint via the Respondents' Registrar-confirmed email addresses, which were successfully transmitted to the Respondents, as the Center did not receive any notice that the email addresses used were invalid and/or that the messages could not be delivered.

The Panel also notes that the disputed domain names were all registered in 2025, three years after the commencement of the conflict. The Respondents were able to set up active websites under the disputed domain names and therefore appear to have Internet access and capable of controlling both the disputed domain names and the related content.

It is moreover noted that, for the reasons which are set out later in this Decision, the Panel has no serious doubt (albeit in the absence of any Response) that the Respondents registered and have used the disputed domain names in bad faith and with the intention of unfairly targeting the Complainant's goodwill in its trademark.

The Panel will proceed to a Decision accordingly.

B. Consolidation of Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests consolidation of the disputes against multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.11.2.

As regards common control, the Panel notes that:

- all disputed domain names have a very similar naming pattern: all of them using the Complainant's marks CIRCUS and CIRCUS CASINO with minor modifications;
- all disputed domain names resolve to websites displaying the Complainant's logos or the Complainant's trademark CIRCUS and/or CIRCUS CASINO together with game icons very similar to those of the Complainant's website;
- all disputed domain names resolve to websites containing links redirecting to third-party gambling platforms;
- four registrants are reportedly located in Ukraine and the fifth registrant reportedly located in Poland has, as confirmed by the relevant registrar, a phone number with the international code for Ukraine; and
- finally, the Respondents did not react in any way to the proceedings – the Respondents neither objected to the Complainant's consolidation request nor filed any Response.

Therefore, as regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to below as "the Respondent") in a single proceeding.

6.2. Substantive Issues

According to paragraph 4(a) of the Policy, the Complainant must prove that:

- (i) the disputed domain names are 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 with respect to the disputed domain names; and
- (iii) the disputed domain names have been registered and are 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 trademarks and the disputed domain names. [WIPO Overview 3.1](#), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of the marks CIRCUS and CIRCUS CASINO for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

In the present case, the disputed domain names are confusingly similar to these marks in which the Complainant has rights since they incorporate the entirety of the marks CIRCUS or CIRCUS CASINO and only add minor variations to it (hyphens, pluralization, or reversal of word order).

It has long been established by UDRP panels that where the relevant trademark is recognizable within the disputed domain names, the mere addition of other terms does not prevent a finding of confusing similarity under the first element of the Policy. [WIPO Overview 3.1](#), section 1.8. This is the case at present – the CIRCUS and CIRCUS CASINO trademarks clearly remain recognizable in each of the disputed domain names.

Finally, it has also long been held that Top-level Domains are generally disregarded when evaluating the confusing similarity between a disputed domain name and a trademark. [WIPO Overview 3.1](#), section 1.11.1.

Based on the available record, 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.

While 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 often impossible 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. 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 record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names, since it has never assigned, granted, licensed, sold, transferred, or in any way authorized the Respondent to use the CIRCUS or CIRCUS CASINO marks in any manner.

There is further no evidence that the Respondent is commonly known by the disputed domain names or has used or made any preparations to use the disputed domain names in relation to a bona fide offering of goods or services.

Further, the composition of the disputed domain names coupled with the use of the disputed domain names to resolve to websites displaying the Complainant's logo and marks, offering same/competing services, using the Complainant's logo as a favicon and, in some cases, expressly pretending to be the Complainant as well as containing links redirecting Internet users to competing third party gambling platforms, affirms the Respondent's intention of taking unfair advantage of the likelihood of confusion between the disputed domain names and the Complainant as to the origin or affiliation of the websites under the disputed domain names.

The Respondent did not file a Response and hence has not rebutted the Complainant's contentions.

Based on the available record, the Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

As stated in many decisions rendered under the Policy (e.g. *Robert Ellenbogen v. Mike Pearson*, WIPO Case No. [D2000-0001](#)) both conditions, registration and use in bad faith, must be demonstrated; consequently, the Complainant must show that:

- the disputed domain names were registered by the Respondent in bad faith, and
- the disputed domain names are being used by the Respondent in bad faith.

(i) In the present case, the Complainant provided evidence which demonstrates that it has rights in the registered trademarks CIRCUS and CIRCUS CASINO, registered and used in many jurisdictions around the world before the disputed domains were registered.

Noting the use of the disputed domain names as discussed above, it is inconceivable for this Panel that the Respondent registered and used the disputed domain names for online gambling websites without knowledge of the Complainant's rights, which leads to the necessary inference of bad faith. [WIPO Overview 3.1](#), section 3.2.2.

This finding is supported by the fact that the disputed domain names not only incorporate the Complainant's trademarks CIRCUS and CIRCUS CASINO entirely but the websites also display the Complainant's logos  or  and the CIRCUS CASINO mark.

Therefore, the Panel is convinced that the disputed domain names were registered in bad faith by the Respondent.

(ii) The Complainant has put forward extensive evidence that the disputed domain names are used by the Respondent to resolve to websites featuring the Complainant's logo and CIRCUS CASINO mark, including as a favicon and, in some cases, using language clearly suggesting that they are operated by the Complainant. In doing so, the Respondent gives Internet users the impression that the sites are controlled or at least authorized by the Complainant, which is not the case. This clearly disrupts the Complainant's business and shows that the Respondent intentionally attempts to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark, which constitutes bad faith.

The evidence and documents produced and put forward by the Complainant together with the fact that the Respondent failed to file a Response and therefore failed to present any evidence of any good faith registration and use with regard to the disputed domain names prove that the disputed domain names were registered and used by the Respondent in bad faith under paragraph 4(a)(iii) of the Policy.

Based on the available record, 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 names <casino-circus.com>, <casinocircus.net>, <circus-casino.net>, <circus-casino.org>, and <circus-casinos.org> be transferred to the Complainant.

/Peter Burgstaller/

Peter Burgstaller

Sole Panelist

Date: July 30, 2026