

## ADMINISTRATIVE PANEL DECISION

Circus Belgium S.A. v. Dynadot Privacy Service, Dynadot, LLC, Yaroslav Kariakin, Accenture, Denis Krazok, Vitaliia Bolban, Sofiia Shkliaruk, Nazar Baila  
Case No. D2026-2277

### 1. The Parties

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

The Respondents are Dynadot Privacy Service, Dynadot, LLC, United States of America; Yaroslav Kariakin, Accenture, Vitaliia Bolban, Sofiia Shkliaruk, Nazar Baila, Ukraine, and Denis Krazok, Poland

### 2. The Domain Names and Registrars

The Disputed Domain Names <casino-circus-briancon.com>, <casino-circus-carnac.com>, <casinocircusfr.com>, and <casino-de-leucate.com> are registered with Hosting Concepts B.V. d/b/a Registrar.eu.

The Disputed Domain Names <mycircuscasinofrance.com>, <circuscasinofrance.com>, and <circuscasinofrance.net> are registered with Dynadot Inc (the “Registrars”).

### 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 27, 2026. On May 28, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On May 29 and 30, 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 and contact information in the Complaint.

The Center sent an email communication to the Complainant on June 4, 2026 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar(s), 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 June 8, 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 12, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 2, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on July 3, 2026.

The Center appointed Gabriela Kennedy as the sole panelist in this matter on July 10, 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 established operator in the gaming and casino sector, both through terrestrial casinos and online gaming activities. The Complainant operates an extensive network of casinos, particularly in France.

The Complainant owns various trademarks for CIRCUS, CIRCUS CASINO, MY CIRCUS, CIRCUS BET and location-specific marks. The relevant trademark registrations include, inter alia, the European Union Trademark Registration No. 011664547 for  in Classes 9, 28 and 41 registered on May 17, 2014, the European Union Trademark Registration No. 018025773  in Classes 9, 28 and 41 registered on October 20, 2020, the French Trademark Registration No. 4663999 for  in Classes 9, 28 and 41 registered on December 18, 2020, the French Trademark Registration No. 466398  in Classes 9, 28 and 41 registered on December 18, 2020, the French Trademark Registration No. 4663969 for  in Classes 9, 28 and 41 registered on December 18, 2020, the European Union Trademark Registration No. 018900523 for MY CIRCUS in Classes 9, 28, 35, 41, 42, 43, and 45 registered on November 6, 2024, the European Union Trademark Registration No. 006071914 for  in Classes 9, 37 and 41 registered on October 23, 2008, and the European Union Trademark Registration No. 019052360 for CIRCUS BET in Classes 9, 28, 41, and 42 registered on January 9, 2025 (collectively the “Complainant’s Trademarks”).

The Disputed Domain Names were registered as follows: <circuscasinofrance.com> on January 12, 2026; <mycircuscasinofrance.com> and <circuscasinofrance.net> on March 26, 2026; <casinocircusfr.com> on March 27, 2026; <casino-circus-carnac.com> on April 15, 2026; <casino-circus-briancon.com> on April 16, 2026; and <casino-de-leucate.com> on April 23, 2026. All the Disputed Domain Names were registered years after the Complainant registered the Complainant’s Trademarks.

According to the Complainant, at the time of filing of the Complaint:

- the Disputed Domain Names <casino-circus-briancon.com> and <casino-circus-carnac.com> resolved to websites which prominently reproduced the Complainant’s CIRCUS CASINO mark, presented themselves as local Circus casino websites for the respective French locations, and displayed calls to action such as “S’inscrire” (“Sign up”), “Jouer maintenant” (“Play now”), and “Réclamer le bonus” (“Claim the bonus”). The click through links redirected users to third-party gambling platforms;
- the Disputed Domain Name <casino-de-leucate.com> resolved to a website which reproduced and referred to the Complainant’s CIRCUS and CIRCUS CASINO marks and targeted the Complainant’s Leucate casino brand, also redirecting users to a third-party gambling platform;

- the Disputed Domain Names <mycircuscasinofrance.com>, <circuscasinofrance.com>, and <circuscasinofrance.net> resolved to websites that prominently displayed the Complainant's CIRCUS sign and presented themselves as "Circus Casino France", displayed online casino content including welcome bonuses, payment methods, licensing claims, and registration instructions. The website at <circuscasinofrance.com> even referenced the Belgian gambling authority and used an email address ending in "@circus.be". These websites redirected users to third-party gambling platforms;
- the Disputed Domain Name <casinocircusfr.com> used the CASINO + CIRCUS + FR combination in the Disputed Domain Name for French-facing casino targeting and redirected users to a third-party gambling registration page;
- the favicon used by the websites at <casino-circus-briancon.com>, <casino-circus-carnac.com>, and <casino-de-leucate.com> was identical to the favicon used on the Complainant's official website.

At the time of the rendering of this Decision:

- the Disputed Domain Names all resolved to active websites which displayed at least one of the Complainant's Trademarks and included click-through links that redirected to third-party websites (collectively, the "Respondent's Websites").

## **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 Names. Notably:

(a) The Disputed Domain Names are confusingly similar to the Complainant's Trademarks. They incorporate the Complainant's Trademarks (CIRCUS, CIRCUS CASINO, or MY CIRCUS) in their entirety. The addition of geographical or descriptive elements such as "France", "fr", "Briançon", "Carnac" or "Leucate", the inversion of the terms "casino" and "circus", the omission of hyphens, or the use of different generic Top-Level Domains, do not avoid confusing similarity. On the contrary, these elements reinforce the association with the Complainant, since they refer to the territory and sector in which the Complainant operates under the CIRCUS and CIRCUS CASINO brands.

(b) The Respondents have no rights or legitimate interests in the Disputed Domain Names. The Respondents are neither affiliated with nor authorized by the Complainant to use the Complainant's Trademarks. Nor is there any evidence that the Respondents have been commonly known by any of the Disputed Domain Names, or that it holds any trademark, trade name or other right corresponding to those Disputed Domain Names. Most of the Disputed Domain Names are used to impersonate the Complainant, to appropriate its distinctive signs and to create the false impression of official or affiliated casino platforms. All of the Respondent's Websites display at least one of the Complainant's Trademarks, and contain click through links that redirect to third-party gambling platforms that are not authorized by the Complainant and that are not official CIRCUS, CIRCUS CASINO or MY CIRCUS platforms. Two of the Respondent's Websites include a disclaimer stating that the website allegedly offers independent analyses and has no official link with Circus Casino or its operators. However, this disclaimer appears only after the website already reproduced the Complainant's CIRCUS CASINO signs, presented itself as "Circus Casino France", and offered services that are similar to that of the Complainant. The overall presentation of the website is plainly designed to attract Internet users by creating an association with the Complainant's Trademarks.

(c) The Disputed Domain Names were registered and are being used in bad faith. The registration dates of the Disputed Domain Names are clustered in early 2026, all post-dating the registration of the Complainant's Trademarks. The Respondents therefore could not reasonably have been unaware of the Complainant or its trademark portfolio at the time of registration of the Disputed Domain Names. The composition of the

Disputed Domain Names demonstrates actual targeting of the Complainant. The Respondents deliberately selected domain names reproducing or closely imitating the Complainant's Trademarks, including CIRCUS, CIRCUS CASINO and MY CIRCUS, combined with descriptive or geographical elements such as "casino", "France", "fr", "Briançon", "Carnac" and "Leucate". These additions reinforce the Respondents' bad faith as they directly refer to the Complainant's field of activity and to the French territory in which the Complainant operates and promotes its land-based casino establishments. Moreover, the fact that the Respondent's Websites displayed at least one of the Complainant's Trademarks confirms that the Respondents had actual knowledge of the Complainant and intentionally sought to create a false association with it. The websites reproduce or prominently refer to the Complainant's CIRCUS and CIRCUS CASINO signs, including in headers, footers, favicons, app mock-ups and promotional sections. The websites also use expressions such as "Circus Casino France", "My Circus Casino France En Ligne", "Circus Leucate App", "Casino Circus Carnac App", "Circus Briançon App", "Casino Circus Carnac", "Circus Casino — Créer Votre Compte Joueur Pas à Pas" and similar wording. The Respondents are using the Disputed Domain Names to 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 and of the gambling services promoted through them.

## **B. Respondents**

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

## **6. Discussion and Findings**

### **Procedural Issue: Location of some of the 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 also that the administrative proceedings take place with due expedition. The Panel notes that the disclosed registrant information for several of the Disputed Domain Names indicates addresses in Ukraine. Given the ongoing international conflict affecting Ukraine at the date of this Decision, the Panel has considered whether the proceedings should continue and whether the Respondents have been afforded a fair opportunity to present its case in accordance with paragraph 10 of the Rules.

Having considered all the circumstances of the case, the Panel is satisfied that the proceedings should continue, given that the Center has taken reasonable steps to notify the Respondents, and the Disputed Domain Names were all registered in early 2026, during the ongoing international conflict. This indicates that the Respondents have been able to access the Internet and maintain control of the Disputed Domain Names throughout this period. In these circumstances, the Panel concludes that the Respondents have been afforded a fair opportunity to present its case, and decides to proceed to a decision accordingly. See *SportPesa Holdings Ltd. v. Olena Obriekova*, WIPO Case No. [D2025-2973](#).

### **Consolidation: Multiple Respondents**

WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.1](#)"), section 4.11.2. provides that where a complaint is filed against multiple respondents, panels will take into account whether (i) the domain names or corresponding websites are subject to common control, and (ii) the consolidation would be fair and equitable to all parties.

The Panel notes that:

(i) The Disputed Domain Names were registered within a narrow time period (January to April 2026) using only two Registrars (Hosting Concepts B.V. d/b/a Registrar.eu and Dynadot Inc).

(ii) The websites associated with the Disputed Domain Names followed a common pattern: they all prominently displayed the Complainant's CIRCUS or CIRCUS CASINO marks and redirected users to third-party platforms.

(iii) The Disputed Domain Name registrants did not comment on the Complainant's request to consolidate the complaints against different registrants.

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.

### **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 Names. [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 Panel finds the Complainant's Trademarks are recognizable within each of the Disputed Domain Names. The Disputed Domain Names <casino-circus-briancon.com> and <casino-circus-carnac.com> incorporate the Complainant's CIRCUS mark combined with geographical terms referring to French casino locations and the Disputed Domain Name <casinocircusfr.com> incorporate the Complainant's CIRCUS mark combined with "casino" and "fr". The Disputed Domain Names <circuscasinofrance.com>, and <circuscasinofrance.net> incorporate the Complainant's CIRCUS CASINO mark combined with geographical references to France. The Disputed Domain Name <mycircuscasinofrance.com> incorporates the Complainant's MY CIRCUS mark combined with "casino" and "France".

The Disputed Domain Name <casino-de-leucate.com> incorporates certain features of the Complainant's CIRCUS CASINO LEUCATE mark. The Panel also notes that this Disputed Domain Name resolves to a website featuring the Complainant's CIRCUS mark and promoting casino and gaming business similar to that of the Complainant. The Panel therefore finds that the broader case context (in the present case, the website content) supports a finding of confusing similarity with the Complainant's Trademark. [WIPO Overview 3.1](#), sections 1.7 and 1.15.

Furthermore, it is well established that the generic Top-Level Domains ("gTLDs") ".com" and ".net" may be disregarded for the purposes of assessing confusing similarity under the first element. [WIPO Overview 3.1](#), section 1.11.1.

Although the addition of other terms such as "casino", "France", "fr", "briancon", "carnac", and "leucate", in the present case 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 Names and the Complainant's Trademarks 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.

The Panel notes that there is no evidence to show that the Respondent has trademark rights corresponding to the Disputed Domain Names, or that the Respondent has become commonly known by the Disputed Domain Names. The Panel further notes that the Complainant has provided no license or authorization of any kind to the Respondent to use the Complainant's Trademarks or to apply for or use any domain name incorporating the Complainant's Trademarks.

The Panel notes that all of the Respondent's Websites feature the Complainant's CIRCUS CASINO and/or MY CIRCUS marks and promote casino and gaming business similar to that of the Complainant, and in some cases using an email address ending in "@circus.be" (i.e. the Complainant's official domain name) all without the Complainant's authorization. The Disputed Domain Names were used to redirect Internet users to third-party gambling platforms (including Savaspin, Baxterbet, and Dragonia). The Respondent would likely not have adopted the Complainant's Trademarks if not for the purpose of creating an impression that these Disputed Domain Names are associated with, or originate from, the Complainant.

Panels have held that the use of a domain name for illegitimate activity, in this case passing off, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1. The Panel further notes that while two of the Respondent's Websites include disclaimers stating that the websites have no official link with the Complainant, these websites nevertheless contain links to various casino games and a "Play Now" and "Get Bonus" click-through buttons re-directing users to third party sites. Such disclaimers are insufficient to establish rights or legitimate interests where the overall presentation of the websites is designed to create an association with the Complainant's Trademarks and to commercially exploit the goodwill attached thereto.

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 Names. 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 Names such as those enumerated in the Policy or otherwise.

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.

The Respondent must have been aware of the Complainant and the Complainant's Trademarks when registering and using the Disputed Domain Names, given the reputation of the Complainant's Trademarks in the gaming and casino sector and the fact that the Complainant's Trademarks were registered and in use well before the Respondent registered the Disputed Domain Names. The Panel also finds the Respondent registered the Disputed Domain Names to attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant's Trademarks. All of the Respondent's Websites prominently display the Complainant's Trademarks, promote casino and gaming businesses similar to that of the Complainant, and contain click through links which redirect Internet users to third-party sites. Some of the Respondent's Websites even replicate the Complainant's favicon and provide an email address ending in the Complainant's official domain "@circus.be", clearly intended to create the false impression of being operated by or affiliated with the Complainant. The Panel further notes that while certain of the Respondent's Websites include disclaimers stating that the websites have no official relationship with the

Complainant, such disclaimers cannot cure the Respondent's bad faith where the overall circumstances of the case point to bad faith. [WIPO Overview 3.1](#), section 3.7. The Respondent has been using the Disputed Domain Names to mislead and divert Internet users to third-party platforms for commercial gain by creating a likelihood of confusion with the Complainant's Trademarks as to the source, sponsorship, affiliation, or endorsement of its websites.

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-briancon.com>, <casino-circus-carnac.com>, <casinocircusfr.com>, <casino-de-leucate.com>, <circuscasinofrance.com>, <circuscasinofrance.net>, and <mycircuscasinofrance.com> be transferred to the Complainant.

*/Gabriela Kennedy/*

**Gabriela Kennedy**

Sole Panelist

Date: July 24, 2026