

ADMINISTRATIVE PANEL DECISION

Circus Belgium S.A. v. Andrew Smirnov, Salomoon, KARTASHOV
VLADYSLAV, Romualdo Ventura
Case No. D2026-2515

1. The Parties

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

The Respondents are Andrew Smirnov, Salomoon, United States of America; KARTASHOV VLADYSLAV, Ukraine; and Romualdo Ventura, Italy.

2. The Domain Names and Registrars

The disputed domain name <casino-circus-fr.com> is registered with Global Domain Group LLC.

The disputed domain names <circuscasino-fr.org> and <fr-circuscasino.com> are registered with URL Solutions, Inc.

The disputed domain name <en-circuscasino.com> is registered with Register SPA (the “Registrars”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 10, 2026.¹ On June 10, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On June 11, 2026 and June 12, 2026, the Registrars transmitted by email to the Center their verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Redacted; Redacted for Privacy) and contact information in the Complaint.

The Center sent an email communication to the Complainant on June 25, 2026 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints 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 disputed domain names are under common control. The Complainant filed an amended Complaint on June 26, 2026.

¹The Complaint was filed in relation to the disputed domain names and another domain name, which was removed from the proceeding on June 23, 2026 per the Complainant’s request.

On June 25, 2026, the Center informed the Parties in Italian and English that the language of the Registration Agreement for the disputed domain name <en-circuscasino.com> is Italian. On June 26, 2026, the Complainant submitted a request that English be the language of the proceeding. The Respondents did not submit any comment on the Complainant's submission.

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 in English and Italian of the Complaint, and the proceedings commenced on July 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 5, 2026. One of the Respondents sent email communications to the Center on June 13, 2026 and June 29, 2026, respectively in relation to the possible settle regarding the disputed domain names <circuscasino-fr.org> and <fr-circuscasino.com>. On June 26, 2026, the Complainant informed the Center that it would not suspend the proceedings. On August 9, 2026, the Center informed the Parties that it would proceed with panel appointment.

The Center appointed Tobias Malte Müller as the sole panelist in this matter on August 17, 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. Further Procedural Considerations

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 proceeding takes place with due expedition.

Since one of the Respondents' mailing address is stated to be in Ukraine, which is subject to an international conflict at the date of this Decision that 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 proceeding should continue.

Having considered all the circumstances of the case, the Panel is of the view that it should continue. The Panel has reached this conclusion in part because the Panel recognizes that the Center employed all reasonably available means calculated to achieve actual notice to this Respondent. In particular, the Center's Notification of the Complaint email was successfully delivered to the email address of this Respondent disclosed by the Registrar in its Registrar Verification Response. Furthermore, the Center also sent the Written Notice to the postal address of this Respondent disclosed by the Registrar in its Registrar Verification Response.

Furthermore, the Panel notes that the disputed domain names <circuscasino-fr.org> and <fr-circuscasino.com> were in May 2026, during the international conflict. Moreover, the Center received two email communications from this Respondent as described under section 3, which suggests that this Respondent was and is able to access the Internet.

Finally, for the reasons which are set out later in this Decision, the Panel has no serious doubt that this Respondent registered and has used the disputed domain names in bad faith.

The Panel therefore concludes that this Respondent has been given a fair opportunity to present its case, and so that the administrative proceeding takes place with due expedition the Panel will proceed to a Decision accordingly.

5. Factual Background

The Complainant's undisputed statements confirm that it is a Belgian company which provides licensed online gambling and terrestrial casino services in Belgium, the Netherlands (Kingdom of the) and other European countries. One of the Complainant's official websites is hosted under the domain names <circus-casino.be> and <circuscasino.fr>.

It further results from the Complainant's documented evidence, which remained undisputed, that it is the registered owner of trademark registrations worldwide incorporating the term "Circus", including European Union Trademark Registration No. 18025773 **Circus**, registered on October 20, 2020 for goods and services in classes 9, 28, and 41.

According to the WhoIs extracts before this Panel and the information provided by the Registrars, the disputed domain names were registered between April 4, 2026 and May 17, 2026 and the relevant data are the following:

Domain Name	Registration Date	Domain Holder Name
<casino-circus-fr.com>	April 4, 2026	Andrew Smirnov, Salomoon
<fr-circuscasino.com>	May 11, 2026	KARTASHOV VLADYSLAV
<circuscasino-fr.org>	May 11, 2026	KARTASHOV VLADYSLAV
<en-circuscasino.com>	May 17, 2026	Romualdo Ventura

The disputed domain names resolve to websites allegedly offering online gambling and casino services and prominently displaying without authorization the Complainant's mark CIRCUS.

6. 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, the Complainant contends that:

- (1) the Complaint for the disputed domain names should be consolidated. The totality of the evidence supports the conclusion that the disputed domain names or the corresponding websites are subject to common control and that consolidation is fair and equitable;
- (2) each of the four disputed domain names incorporates, in a clearly recognizable manner, the Complainant's CIRCUS trademark together with the term "casino". Taken together, these elements reproduce or closely imitate the distinctive combination used by the Complainant in connection with its casino and online gaming activities, including through its official website <circus-casino.be>. The Respondents merely introduce insignificant variations such as including or removing hyphens, adding geographical or language identifiers. These variations are non-distinctive;
- (3) the disputed domain names are being used as a traffic-capture or affiliate-style redirection mechanism to divert Internet users seeking the Complainant or its Circus / Circus Casino services towards an unauthorized third-party gambling operator. Such use is inherently misleading and cannot confer any rights or legitimate interests upon the Respondents. The disputed domain name <casino-circus-fr.com> resolves to a page headed "Casino Circus France Casino en Ligne 2026" with French-language calls to action ("S'inscrire", "Obtenir le bonus"), advertising "5 000+ jeux disponibles", a "2 200 € + 130 tours" welcome bonus, a €10 minimum deposit, average withdrawal time of "5 min", and references to "support francophone 24 h/24", and payment methods including Cashlib, Neosurf, bank cards and cryptocurrencies.

The disputed domain name <fr-circuscasino.com> displays French-language banners (“Profitez des meilleurs bonus Circus Casino en ligne”, “Jusqu’à 1500€ + 300 tours gratuits”), and circus/casino imagery.

The disputed domain name <circuscasino-fr.org> displays “Circus Casino”, with banners offering “1200€ + 250 Free Spins”, and uses French-language descriptions and instructions on how to register VIP tiers (“Bronze”, “Silver”, “Gold”).

The disputed domain name <en-circuscasino.com> displays a red “C” logo with the word “circus”, a “Welcome to Circus!” banner describing the site as an iGaming/sports-betting leader, navigation tabs (“Casino Games”, “Sports Betting”, “Dice Games”, “Promotions”), and offers including “Circus 1000% Boost” and “Crazy BetXtra”.

- (4) the disputed domain names were registered and are being used in bad faith. The disputed domain names all follow the same deliberate naming pattern. Such a pattern cannot be coincidental. It demonstrates that the Respondents had the Complainant and its casino-related activities specifically in mind when registering the disputed domain names. The content of the websites confirms that the Respondents were fully aware of the Complainant and intentionally sought to create a false association with it. The websites do not merely contain abstract or descriptive references to casino services. They present themselves as “Circus Casino”, “Casino Circus”, “Circus Casino France”, “Circusbet Casino”, or equivalent Circus/Casino platforms, and reproduce the Complainant’s distinctive signs, logos, favicon or visual identity.

B. Respondents

The Respondents did not formally reply to the Complainant’s contentions. The Respondent associated with the disputed domain names <fr-circuscasino.com> and <circuscasino-fr.org> sent an email communication to the Center on June 13, 2026, indicating a willingness to resolve the dispute amicably and requesting information regarding settlement. Following a communication from the Complainant concerning a possible voluntary transfer of those two disputed domain names, the Respondent sent a further email communication to the Center on June 29, 2026, indicating that it did not consent to the voluntary transfer of these disputed domain names and these disputed domain names had been registered in good faith for use as an independent informational blog concerning the casino and gambling industry in general, and not to target the Complainant or its business activities.

7. Discussion and Findings

Paragraph 15(a) of the Rules instructs this Panel to “decide a 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”. Paragraph 4(a) of the Policy requires a complainant to prove each of the following three elements in order to obtain an order that each disputed domain name be transferred or cancelled:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
- (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.

The Panel will therefore proceed to analyze whether the three elements of paragraph 4(a) of the Policy are satisfied.

6.1 Procedural Issues

A. Consolidation: 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 the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not specifically 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 set forth in section 4.11.2 of the [WIPO Overview 3.1](#): "Panels have considered a range of factors, typically present in some combination, as useful to determining whether such consolidation is appropriate, such as similarities in or relevant aspects of (i) the registrants' identity(ies) including pseudonyms, (ii) the registrants' contact information including email address(es), postal address(es), or phone number(s), including any pattern of irregularities, (iii) relevant IP addresses, name servers, or webhost(s), (iv) the content or layout of websites corresponding to the disputed domain names, (v) the nature of the marks at issue (e.g., where a registrant targets a specific sector), (vi) any naming patterns in the disputed domain names (e.g., <mark-country> or <mark-goods>), (vii) the relevant language/scripts of the disputed domain names particularly where they are the same as the mark(s) at issue, (viii) any changes by the respondent relating to any of the above items following communications regarding the disputed domain name(s), (ix) any evidence of respondent affiliation with respect to the ability to control the disputed domain name(s), (x) any (prior) pattern of similar respondent behavior, or (xi) other arguments made by the complainant and/or disclosures by the respondent(s)."

As regards common control, the Panel notes the following factors:

- (1) The disputed domain names reproduce a similar naming pattern, i.e., including the CIRCUS mark together with the term "casino" plus a non-distinctive geographical/language identifier ("en" or "fr").
- (2) Some of the Respondents' contact details appear to be inaccurate.
- (3) The disputed domain names were registered within a relatively short time period between April 4, 2026 and May 17, 2026.
- (4) The content or layout of websites corresponding to the disputed domain names consists in the presentation or promotion of online casino and gambling services using Circus/Circus Casino signs, with bonus offers, registration calls to action, and casino imagery, and redirect users to third-party gambling platforms.

On the balance of probabilities and taking into account the above circumstances of the present case, the Panel finds that the disputed domain names are under common control.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. The Respondents have been given the opportunity to comment on the foregoing and have elected not to file a formal response. In particular, the Respondents failed to come forward with any specific allegations or evidence to object the consolidation.

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.

B. Language of the Proceeding

The language of the Registration Agreement for one of the four disputed domain names <en-circuscasino.com> is Italian. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including:

- (1) The Respondent chose English for this disputed domain name: In fact, the disputed domain name begins with the prefix “en” which is commonly used as a language identifier for “English”;
- (2) The website associated with the disputed domain name <en-circuscasino.com> is in English. It prominently displays English-language gambling content, including the wording “Welcome to Circus!”;
- (3) The website includes English-language explanations and registration guidance;
- (4) The website under this disputed domain name redirects users to a third-party gambling platform, which is an online gambling platform presented in English; and
- (5) Requiring the Complainant to translate the entire Complaint and annexes into Italian for that reason alone would create disproportionate cost, delay and procedural complexity, while providing no real benefit or to the efficient administration of the case.

The Respondent did not make any specific submissions with respect to the language of the proceeding.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties’ ability to understand and use the proposed language, time and costs (see [WIPO Overview 3.1](#), section 4.5.1).

The Panel acknowledges that the Center notified both Parties in Italian and English regarding the language of the proceeding. The Complainant formally submitted a request that the proceeding be conducted in the English language.

The Panel notes that the disputed domain name <en-circuscasino.com> is composed of terms in the English language. Paragraph 10 of the UDRP Rules vests the Panel with authority to conduct the proceeding in a manner it considers appropriate while also ensuring that both Parties are treated with equality, and that each Party is given a fair opportunity to present its case. Against this background, the Panel also notes: (i) English is a neutral language for the Parties considering their reported locations; (ii) the Respondent appears to have the ability to understand and use the English language taking into account the content of the website available under this disputed domain name; (iii) the Panel has found that the disputed domain names are subject to the common control and the language of Registration Agreement for the other three disputed domain names is in English; and (iv) taking into consideration that translating the Complaint and would cause extra expenses and delay while the Respondent is not formally participating in this proceeding.

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

6.2 Substantive Issues

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 CIRCUS for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1. The Panel further notes that said trademark is a stylized figurative mark, consisting of the term “Circus” rendered in a bold sans-serif typeface, with a distinctive red “C” device and red letter “i”, followed by the remaining letters “rcus” in black. Panel assessment of identity or confusing similarity involves comparing the (alpha-numeric) domain name and the textual components of the relevant 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 Panel finds that the mark is recognizable in the disputed domain names, where it either appears at the beginning of the disputed domain name or, where it does not appear first, is separated by a hyphen from the first element of the Second-Level Domains. Although the addition of other terms here, “casino”, “fr” or “en”, 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 mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

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 names. The Respondent has not formally 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. In particular, the Respondent claims that the disputed domain names <fr-circuscasino.com> and <circuscasino-fr.org> have been registered for in good faith for use as an independent informational blog concerning the casino and gambling industry in general, and not to target the Complainant or its business activities. However, the Panel notes that the websites associated with these disputed domain names display the Complainant’s mark and promote casino services with links redirecting users to a third-party website which appears to offer casino services as well.

Moreover, regarding the composition of the disputed domain names, the Panel notes that the disputed domain names contain the Complainant’s registered trademark plus the addition of a descriptive term “casino” which is within the Complainant’s field of commerce and a geographic or language abbreviation (i.e., “fr” or “en”). The Panel finds that the composition of the disputed domain names carries a risk of implied affiliation with the Complainant. This is corroborated by the content of the websites to which the disputed domain names resolve, displaying the Complainant’s mark CIRCUS and allegedly offering services in the Complainant’s area of activity. [WIPO Overview 3.1](#), section 2.5.1.

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, the Panel notes that the disputed domain names resolve to websites displaying the Complainant's mark CIRCUS and allegedly offering casino services. For the Panel it is therefore evident that the Respondent knew the Complainant's mark and business. Consequently, and in absence of any evidence to the contrary, the Panel is convinced that the Respondent knew that the disputed domain names included the Complainant's trademark when it registered the disputed domain names.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.1](#), section 3.2.1. In this regard, the further circumstances surrounding the disputed domain names' registration and use confirm the findings that the Respondent has registered and is using the disputed domain names in bad faith, pursuant to paragraph 4(b)(iv) of the Policy:

- 1) The nature of the disputed domain names, incorporating the Complainant's mark plus the addition of the term "casino" in the Complainant's field of activity, plus a geographical or language abbreviation;
- 2) The content of the websites to which the disputed domain names resolve, i.e., displaying the Complainant's mark and allegedly offering casino services. In addition, there are links on the websites associated with the disputed domain names redirecting users to third-party websites purportedly offering online gambling/casino services as well.
- 3) A clear absence of rights or legitimate interests coupled with the Respondent's failure to provide any explanation for its choice of the disputed domain names.

The Panel finds that the Complainant has established the third element of the Policy.

8. 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-fr.com>, <circuscasino-fr.org>, <en-circuscasino.com>, and <fr-circuscasino.com> be transferred to the Complainant.

/Tobias Malte Müller/

Tobias Malte Müller

Sole Panelist

Date: August 31, 2026