ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Circus Belgium S.A. v. Jose Ruben Sanchez Hidalgo, Igor Bakalov, Wojciech Aleksiuk, Maikls Janbergs, Iryna Potseiko, Pavlo Boreiko, ANDRII FEDECHKO, IHOR YEMTSOV, Ihor Neroda, Viktoriya Byelashova, YURY ZANCHENKO, Nikita Chornobryvets
Case No. D2026-2793

1. The Parties

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

The Respondents are Jose Ruben Sanchez Hidalgo, Spain; Igor Bakalov, Russian Federation; Wojciech Aleksiuk, Poland; Maikls Janbergs, Latvia; Iryna Potseiko, Ukraine; Pavlo Boreiko, Ukraine; ANDRII FEDECHKO, Ukraine; IHOR YEMTSOV, Ukraine; Ihor Neroda, Ukraine; Viktoriya Byelashova, Ukraine; YURY ZANCHENKO, Ukraine; and Nikita Chornobryvets, Ukraine.

2. The Domain Names and Registrars

The disputed domain names <circusbet.net> and <circusnl.com> are registered with NameSilo, LLC.

The disputed domain name <circus-es.com> is registered with NameCheap, Inc.

The disputed domain name <circus-fr.com> is registered with Name.com, Inc.

The disputed domain name <circus-nl.com> is registered with Devexpanse Ltd d/b/a Regery.com.

The disputed domain names <circus-casino-be-be.com>, <circuscasinobe-be.com>, <circuscasino-de.com>, <circuscasino-hu.com>, <circuscasinoonline-be.com>, <circus-de.com>, <circus-hu.com>, <circus-uk.com>, and <nl-circuscasino.com> are registered with Dynadot Inc.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 26, 2026. On June 26, 2026, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. On June 26 and 29, 2026, the Registrars transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (N/A) and contact information in the Complaint.

The Center sent an email communication to the Complainant on July 10, 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 July 13, 2026.

On July 12, 2026, the Complainant made a request for the partial withdrawal of a disputed domain name and the addition of the disputed domain name <circus-hu.com>. On August 3, 2026, the Center notified the relevant parties of the requested partial withdrawal. Further to the request of the addition of the disputed domain name <circus-hu.com> to the Complaint, the Center sent a new email communication to the Complainant on August 6, 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 amendment to the Complaint on August 6, 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 August 18, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 7, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 10, 2026.

Due to an administrative oversight, the Center contacted the Respondent of the disputed domain name <circusbet.net> on September 25, 2026. In light of this, the Respondent was granted a five-day period (e.g., through September 30, 2026) in which to indicate whether it wishes to participate in this proceeding. The Respondent did not submit any response.

The Center appointed Torsten Bettinger as the sole panelist in this matter on October 2, 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 Belgian company active in casino, betting, gaming, and online gambling services under the CIRCUS and CIRCUS CASINO brands. The record shows that the Complainant operates official CIRCUS-branded gambling services, including through the website at the domain name <circus-casino.be>, and has used the CIRCUS sign in connection with its gaming activities for many years.

The Complainant owns numerous trademark registrations incorporating the CIRCUS mark. The evidence includes, among others,

- European Union Trade Mark No. 018025773 for the figurative CIRCUS mark, registered on October 20, 2020, in classes 9, 28, and 41;
- European Union Trade Mark No. 019052360 for CIRCUS BET, registered on January 9, 2025, in classes 9, 28, 41, and 42;
- European Union Trade Mark No. 006071914 for the figurative CIRCUS CASINO mark, registered on October 23, 2008.

The Complainant also owns further CIRCUS-formative registrations in several jurisdictions.

The disputed domain names were registered between September 5, 2025, and June 9, 2026.

The evidence submitted by the Complainant shows that the disputed domain names have been used for websites displaying CIRCUS or CIRCUS CASINO branding and presenting themselves as localized casino or betting websites. The websites contain casino and betting content, registration and login prompts, bonus offers, payment information, responsible-gaming language, and country-specific references. The evidence further shows that users are redirected from the CIRCUS-branded websites to unrelated third-party gambling platforms.

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.

The Complainant submits that the disputed domain names are confusingly similar to its CIRCUS trademark because each reproduces the mark in recognizable form and merely adds descriptive gambling-related terms and/or geographic terms.

The Complainant further submits that the Respondents have no rights or legitimate interests in the disputed domain names. The Complainant has not authorized the Respondents to use its marks, the Respondents are not commonly known by the disputed domain names, and the use of the disputed domain names for websites imitating localized CIRCUS casino services and redirecting users to unrelated gambling platforms is not a bona fide offering of goods or services or a legitimate noncommercial or fair use.

The Complainant contends that the disputed domain names were registered and are being used in bad faith.

According to the Complainant, the composition of the disputed domain names, the reproduction of its CIRCUS and CIRCUS CASINO branding and visual identity, the country-specific presentation, and the redirection of users to third-party gambling platforms demonstrate deliberate targeting of the Complainant for commercial gain.

The Complainant also requests consolidation of the proceedings against the nominally different registrants, asserting that the disputed domain names and corresponding websites are under common control.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy states that the Complainant must prove each of the following three elements: (i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; (ii) the Respondents have no rights or legitimate interests in respect of the disputed domain names; and (iii) the disputed domain names have been registered and are being used in bad faith.

First Preliminary Issue: Location of the Respondent

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 location of some of the Respondents disclosed by the Registrars appears to be in Ukraine, which is subject to an international conflict at the date of this Decision that may impact case notification. It is therefore appropriate for the Panel to consider, in accordance with its discretion under paragraph 10 of the Rules, whether the proceedings should continue.

The Panel notes that the Center notified the Respondents of the Complaint using all available means, including the Respondents' physical addresses and email addresses as disclosed by the Registrars. The record shows that in accordance with the Rules, the Notification of Complaint email was sent both to the postmaster email addresses for the disputed domain names and to Respondents' email addresses disclosed by the Registrars. While the postmaster email correspondence failed, there are no indications that transmission failed in respect of the Respondents' own email addresses. Further the Panel also notes that the Center successfully sent the Written Notice of the Complaint to the Respondents' physical addresses in Ukraine, however the notification could not be delivered for some of them due to the absence of the recipient. The Center has therefore fulfilled its notice obligations under the Rules.

Furthermore, the Panel notes that the disputed domain names were registered between September 5, 2025, and June 9, 2026, during the international conflict, suggesting that the concerned Respondents were able to access Internet, maintain control of the disputed domain names, and thus should have received at least electronic notice of this proceeding.

The Panel also points out that, for the reasons which are set out later in this Decision, the Panel has no serious doubt that the Respondents have registered and has used the disputed domain names in bad faith and with the intention of unfairly targeting the Complainant's trademark and its services.

Having considered all the circumstances of the case, the Panel is of the view that the proceedings should continue.

Second Preliminary Issue: Consolidation of Multiple Respondents

The amended Complaint concerns fourteen disputed domain names registered in the names of twelve nominally different registrants. The Complainant requests consolidation pursuant to paragraph 10(e) of the Rules.

Paragraph 3(c) of the Rules provides 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 assessing a request for consolidation involving nominally different registrants, panels consider whether (i) the disputed domain names or corresponding websites are subject to common control, and (ii) consolidation would be fair and equitable to all parties. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 4.11.2.

The record contains substantial indicia of common control. Two pairs of disputed domain names are registered to identical registrants using the same contact details. More broadly, the disputed websites reproduce the same CIRCUS figurative branding and favicon, follow the same localized casino-site architecture and commercial presentation, and employ the same overall method of attracting users through a CIRCUS-branded website and redirecting them to unrelated third-party gambling platforms.

The evidence also shows that identical redirection endpoints recur across some of the disputed domain names registered in different names: for example, <circusbet.net> and <nl-circuscasino.com> redirect to SpinAura, while <circus-fr.com>, <circus-uk.com>, <circuscasinobe-be.com>, and <circus-hu.com> redirect to the same Cowboy Spin endpoint. Several disputed websites also reproduce the same country-specific regulatory or licensing content. The disputed domain names were registered within a relatively concentrated period and commonly use Cloudflare-managed DNS.

Viewed cumulatively, these circumstances are unlikely to be coincidental and support the conclusion that the disputed domain names and corresponding websites are subject to common control. The Respondents have not come forward to rebut the Complainant's evidence or to oppose consolidation.

The Panel also sees no reason why consolidation would be unfair or inequitable. The disputed domain names target the same Complainant and the same trademark, involve the same substantive issues under the Policy, and display a highly similar pattern of use. Consolidation therefore promotes procedural efficiency without prejudicing the Respondents.

Accordingly, the Panel grants the Complainant's request to consolidate the disputes concerning the 14 disputed domain names. The nominally different registrants are referred to collectively below as the "Respondent".

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 the CIRCUS, CIRCUS BET, and CIRCUS CASINO trademarks for purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

Each of the disputed domain names incorporates the CIRCUS, CIRCUS BET or CIRCUS CASINO mark in its entirety or in clearly recognizable form. The additions of terms such as "online", and of geographic terms such as "de", "es", "fr", "hu", "nl", "uk", and "be", do not prevent a finding of confusing similarity. WIPO Overview 3.1, sections 1.7 and 1.8.

The applicable Top-Level Domains ".com" and ".net" are viewed as standard registration requirements and are disregarded under the first-element comparison.

Accordingly, the Panel finds that the disputed domain names are confusingly similar to the Complainant's CIRCUS, CIRCUS BET or CIRCUS CASINO trademark. 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 a 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 may result in the difficult task of proving a negative, requiring information that is often primarily within the knowledge or control of the respondent. Where a complainant makes out a prima facie case, the burden of production shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests, while the burden of proof remains on the complainant. WIPO Overview 3.1, section 2.1.

The Complainant has not authorized, licensed, or otherwise permitted the Respondent to use the CIRCUS mark. There is no evidence before the Panel that the Respondent is affiliated with the Complainant or has been commonly known by any of the disputed domain names.

The disputed domain names have been used for websites prominently using the Complainant's CIRCUS branding and presenting themselves as localized casino or betting services, while directing users to unrelated third-party gambling platforms. Such use does not amount to a bona fide offering of goods or services. Nor does it constitute legitimate noncommercial or fair use. Rather, the overall presentation is apt to create the false impression that the websites are operated, sponsored, endorsed, or authorized by the Complainant.

The Respondent has not submitted any response and has not come forward with evidence demonstrating rights or legitimate interests in the disputed domain names.

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain names within the meaning of paragraph 4(a)(ii) of the Policy. The second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel notes that paragraph 4(b) of the Policy sets out circumstances, in particular but without limitation, that shall be evidence of the registration and use of a domain name in bad faith.

The Complainant's CIRCUS, CIRCUS BET and CIRCUS CASINO trademark rights predate the registration of all of the disputed domain names. The disputed domain names were registered between September 2025 and June 2026, and each combines the CIRCUS, CIRCUS BET or CIRCUS CASINO mark with gambling-related and/or geographic terms closely connected with the Complainant's business.

More significantly, the websites to which the disputed domain names resolve reproduce the Complainant's CIRCUS or CIRCUS CASINO branding and present themselves as localized gambling services. The use of the Complainant's branding, together with country-specific casino and betting content and, in several instances, regulatory or licensing references, leaves no plausible doubt that the Respondent was aware of the Complainant and its trademark when the disputed domain names were registered.

The evidence further shows that the Respondent uses the disputed domain names to attract Internet users to CIRCUS-branded websites and then redirect them to unrelated third-party gambling platforms. The Panel finds that this conduct intentionally seeks to capitalize on confusion with the Complainant's trademarks for commercial gain and falls within paragraph 4(b)(iv) of the Policy.

In these circumstances, it is unnecessary for the Panel to determine whether any of the third-party gambling platforms to which users were redirected held local or foreign gambling licences. The deliberate use of the Complainant's CIRCUS, CIRCUS BET or CIRCUS CASINO mark and branding to attract users and divert them to unrelated commercial gambling services is sufficient to establish bad-faith registration and use.

Accordingly, the Panel finds that the disputed domain names have been registered and are being used in bad faith within the meaning of paragraph 4(a)(iii) of the Policy. The third element of the Policy has been established.

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 <circusbet.net>, <circus-casino-be-be.com>, <circuscasinobe-be.com>, <circuscasino-de.com>, <circuscasino-hu.com>, <circuscasinoonline-be.com>, <circus-de.com>, <circus-es.com>, <circus-fr.com>, <circus-hu.com>, <circus-nl.com>, <circusnl.com>, <circus-uk.com>, and <nl-circuscasino.com> be transferred to the Complainant.

/Torsten Bettinger/
Torsten Bettinger
Sole Panelist
Date: October 16, 2026