

## **ADMINISTRATIVE Panel DECISION**

Conn Iggulden v. Boss Boss  
Case No. D2026-3337

### **1. The Parties**

Complainant is Conn Iggulden, United Kingdom ("UK"), represented by Platform Law, Canada.

Respondent is Boss Boss, Cambodia.

### **2. The Domain Name and Registrar**

The Disputed Domain Name <conniggulden.com> (hereinafter "Disputed Domain Name") is registered with Gname.com Pte. Ltd. (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 28, 2026. On July 29, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On July 30, 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 (Name Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to Complainant on August 5, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on August 6, 2026.

The Center verified that the Complaint together with the amendment to the 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 Respondent of the Complaint, and the proceedings commenced on August 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 31, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on September 3, 2026.

The Center appointed Lawrence K. Nodine as the sole panelist in this matter on September 14, 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

Complainant has written and published more than thirty books under his name CONN IGGULDEN (hereinafter sometimes the “Mark”). Over more than two decades, he has sold many millions of copies worldwide. Beginning with *The Gates of Rome* (2003), Complainant has authored several multi-book historical fiction series, including the *Emperor* series (on Julius Caesar), the *Conqueror* series (on Genghis Khan), and the *Wars of the Roses* series.

The front covers of many of Complainant’s books share a consistent format that emphasizes Complainant’s name and often include the statement: “#1 NEW YORK TIMES BEST SELLING AUTHOR”:



In 2007 Complainant topped both the United Kingdom fiction and non-fiction bestseller charts when he published the No. 1 fiction hardback (*Wolf of the Plains / Birth of an Empire*) and the No. 1 non-fiction title (*The Dangerous Book for Boys*).

Complainant has received media attention, including on the BBC One programme *Pointless Celebrities* (2010), and the 2018 Amazon Prime Video adaptation of his book *The Dangerous Book for Boys*. Complainant’s works have also attracted press coverage, including articles in *The Times* and *The Guardian*.

From 2008 to 2016, Complainant was the registrant of the Disputed Domain Name.

The Disputed Domain Name, which was registered February 4, 2025, directs to an online gambling site with Indonesian language text.

#### 5. Parties’ Contentions

##### A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Disputed Domain Name.

Notably, Complainant contends that he has established unregistered common law rights in the Mark.

##### B. Respondent

Respondent did not respond to the Complaint

## 6. Discussion and Findings

### 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 Panel finds Complainant has established unregistered trademark or service mark rights for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.3.

There is ample evidence that Complainant is a bestselling author whose name has been used as an indication of the source of Complainant's books, and that his name has become distinctive of that source. The front covers of many of Complainant's books display Complainant's name as a trademark, in large typeface prominently at the top of the page above the book title along with the statement: "#1 NEW YORK TIMES BEST SELLING AUTHOR". The format of the covers conveys the message that, because the book was written by Complainant, readers can expect a predictable style and quality of the writing. The evidence shows that Complainant's name has been used commercially as a source identifier for his literary works. This is the function of a trademark.

Decisions under the Policy have recognized that unregistered trademark rights may be established in a personal name by a successful author who has published a series of books. *Malala Yousafzai v. syed haider*, WIPO Case No. [D2024-1157](#); *Dr. Michael Crichton v. In Stealth Mode*, WIPO Case No. [D2002-0874](#); *Monsieur le Président de la République française, Emmanuel Macron v. Samy Thellier*, WIPO Case No. [D2022-0036](#).<sup>1</sup>

The entirety of the Mark is reproduced within the Disputed Domain Name. Accordingly, the Disputed Domain Name is identical to the Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

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.

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<sup>1</sup> See also *Raphaëlle Giordano v. Veline Go, Alexis Group*, WIPO Case No. [D2024-4270](#); *James Patrick Duffy v. Nie Nie*, WIPO Case No. [D2021-0713](#); *HarperCollins Publishers Limited v. Brandon Rowe*, WIPO Case No. [D2013-0390](#).

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Disputed Domain Name. Respondent has not rebutted 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 use of the Disputed Domain Name to direct users to a gambling site does not support a finding of rights or legitimate interests nor amount to a fair use of the domain name. *H. Lundbeck A/S v. asianslot88 id*, WIPO Case No. [D2025-1484](#). [WIPO Overview 3.1](#), section 2.5.3.

The Panel finds the second element of the Policy has been established.

### **C. Registered and Used in Bad Faith**

Panels have consistently found that the mere registration of a domain name that is identical to a well-known trademark can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4.

Directing a disputed domain name to a third-party gambling site has been found to be bad faith registration and use. See, e.g., *BODUM Intercompany AG and Pi-Design AG v. huai jun zhang, zhanghuai jun*, WIPO Case No. [D2024-2051](#) (disputed domain name identical to the complainant's kitchenware trademark; redirecting to gambling site is bad faith); *AXA SA v. US8 Gacor*, WIPO Case No. [D2026-0898](#) (redirecting to gambling site "reflects an intent to capitalize on the goodwill associated with the complainant's mark for commercial gain.").

The Panel finds that 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 <conniggulden.com> be transferred to Complainant.

*/Lawrence K. Nodine/*

**Lawrence K. Nodine**

Sole Panelist

Date: September 28, 2026