

## **ADMINISTRATIVE PANEL DECISION**

Craig Anthony Astill v. Host Master, Njalla Okta LLC  
Case No. D2026-3360

### **1. The Parties**

The Complainant is Craig Anthony Astill, Australia.

The Respondent is Host Master, Njalla Okta LLC, Saint Kitts and Nevis.

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

The disputed domain name <craigastill.com> is registered with Tucows Domains Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 29, 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 (Unknown Registrant of craigastill.com / registration data redacted) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 4, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amendment to the Complaint on August 5, 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 the Respondent of the Complaint, and the proceedings commenced on August 5, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 25, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 26, 2026.

The Complainant sent email communications to the Center on July 31, August 4, 5, 6, 7, 8, 10, 19, 20, 26 and 28, and September 5 and 7, 2026.

The Center appointed Steven A. Maier as the sole panelist in this matter on September 1, 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.

The Panel has reviewed the Complainant's various emails to the Center, which largely contain allegations as to the Respondent's continuing conduct after the date of the Complaint. The Panel does not consider it necessary for the content of those emails to be taken into account in reaching a decision in this case.

#### **4. Factual Background**

The Complainant is an Australian inventor, entrepreneur, and investor. He is the founder and Chief Executive of Caason Group, which operates across environmental technologies, energy systems, and digital infrastructure platforms.

The Complainant operates a website at "www.craigastill.com.au".

The disputed domain name was registered on July 15, 2026.

The Complainant provides evidence of the use of the disputed domain name for the purpose of emails, including those emanating from "craigastill@craigastill.com". One such email, dated July 21, 2026, is addressed to "Creditors, liquidators, trustees, regulators, former associates, professional contacts, and [a named individual]". The email purports to be sent by the Complainant, and states that the Complainant is transitioning away from Caason group owing to "administrative and legal developments". The email goes on to catalogue a series of supposedly illicit and criminal activities in which the Complainant and certain associates have allegedly been involved.

#### **5. Parties' Contentions**

##### **A. Complainant**

The Complainant submits that he has unregistered or common law trademark rights in the name CRAIG ASTILL. He refers to his website at "www.craigastill.com.au", which provides details of various businesses with which he is involved, including those in agribusiness, energy, mining, fintech and venture capital. The website also describes the Complainant as a frequent speaker and advisor on a range of topics that have been shared with audiences across Australia and on the global stage. The website includes the facility to contact the Complainant to discuss business partnerships, consulting and public appearances.

The Complainant provides Google Console records to the effect that his above website obtained 4.31K impressions and 128 clicks in a three month period between April and June 2026.

The Complainant also refers to the Caason Group website at "www.caason.com.au". That website states: "Craig Astill, founder of Caason Group, regularly participates in industry events, strategic forums, and specialised discussions addressing structural shifts in environmental systems, energy markets, and technology-driven industries. Through invited presentations, panel engagements, and private briefings, these sessions centre on long-term strategic thinking, applied innovation, and real-world commercial dynamics shaping evolving global markets."

The Complainant provides evidence of a LinkedIn page in his personal name with 8,364 followers, and a Facebook page in his personal name with 1.8K followers.

The Complainant also submits evidence of media coverage of his business activities, e.g. an article in Business Insider dated June 26, 2026, stating: “Australian entrepreneur Craig Astill has launched IQ Pitch, an AI powered platform developed by HelpMarket IP that delivers institutional-style investment readiness analysis in seconds.”

The Complainant contends that, as a cumulative effect of the matters referred to above, the name CRAIG ASTILL has become a distinctive identifier that consumers associate with the Complainant’s business activities.

The Complainant relies additionally on section 1.3 of WIPO Overview of WIPO Panel Views on Select UDRP Questions, (“[WIPO Overview 3.1](#)”), which indicates that: “The fact that a respondent is shown to have been targeting the complainant’s mark (e.g., based on the manner in which the mark is used on the related website or impersonating documents or other instruments) may also support the complainant’s assertion and evidence that its mark has achieved significance as a source identifier.”

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

The Complainant submits that the disputed domain name is identical to his CRAIG ASTILL trademark.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. He submits that the Respondent has never been authorized to register the CRAIG ASTILL mark as a domain name, has not been commonly known by that name, and is making neither bona fide commercial use nor legitimate noncommercial or fair use of the disputed domain name. The Complainant asserts that, on the contrary, the Respondent has used the disputed domain name to impersonate the Complainant and to attribute damaging statements to him.

The Complainant contends that the disputed domain name has been registered and is being used in bad faith. He points to the fact that the disputed domain name was used for the purpose of misleading emails only six days after the disputed domain name was registered. He states that the Respondent’s communications were designed to create a false impression that they were authored by the Complainant, and deceptively to interfere with his professional reputation and relationships.

The Complainant further submits that there is no credible explanation for the registration of the disputed domain name, and no plausible good faith use to which it could be put by the Respondent in any event.

The Complainant requests the transfer of the disputed domain name.

## **B. Respondent**

The Respondent did not reply to the Complainant’s contentions.

## **6. Discussion and Findings**

In order to succeed in the Complaint, the Complainant is required to show that all three of the elements set out under paragraph 4(a) of the Policy are present. Those elements are that:

- (i) the disputed domain name is 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 in respect of the disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

## A. Identical or Confusingly Similar

The Complainant does not claim any registered trademark rights in this case, but asserts that he has obtained unregistered or common law trademark rights in his personal name, CRAIG ASTILL, by virtue of the matters referred to above.

This is an area which presents a substantial difficulty for the Complainant.

As observed in section 1.5.2 of [WIPO Overview 3.1](#):

“The UDRP does not explicitly provide standing for personal names that are not registered or otherwise protected as trademarks. Where a personal name is being used as a trademark (i.e., as a source-identifier in trade or commerce), the complainant may be able to establish unregistered or common law rights in the name for purposes of standing to file a UDRP case where the name is used in commerce as a distinctive identifier of the complainant’s goods or services.

Merely having a famous name (such as a businessperson or cultural/political leader who has not demonstrated use of their personal name in a trademark/source-identifying sense), or authoring an article or giving a speech, or making broad unsupported assertions regarding the use of such name in trade or commerce, would not likely demonstrate unregistered or common law rights for purposes of standing to file a UDRP complaint.

Even in cases where the domain name and website content clearly target the personal name, this may not be enough to overcome a lack of specific evidence of use of the name as a distinctive source identifier [...].”

A review of prior UDRP decisions on this issue may be found in *Ryusaku Abe (Name Redacted) v. FlokiNET Ltd WhoisProtection FlokiNET Ltd WhoisProtection, FlokiNET Ltd*, WIPO Case No. [D2026-1145](#). As observed in that case, individuals such as authors, actors, and professional sports personalities may successfully claim to have obtained unregistered trademark rights in circumstances where the commercial activities in which they participate are directly linked to, and recognizable by, their personal name. However, the position is different where an individual claims unregistered rights by virtue only of their position in connection with a reputed business. For example:

- the businesswoman Vanisha Mittal was found not to have unregistered trademark rights in respect of her personal name, despite being a director of a prominent international steel corporation, and also having achieved a degree of celebrity status; the panel observing that “celebrity status, on its own, does not provide a complainant with rights in a trademark or service mark”, and that a personality right was not the same as the use of a trademark in commerce (*Vanisha Mittal v. info@setrillonario.com*, WIPO Case No. [D2010-0810](#)); and

- in *Margaret C. Whitman v. Domains For Sale*, WIPO Case No. [D2008-1534](#), the panel observed that “merely having a ‘famous’ name is not sufficient to establish common law trademark or service mark rights in the name”, and that the complainant had not established unregistered trademark rights in respect of her personal name, despite the international recognition and wide publicizing of her fame and achievement as President and CEO of eBay between 1998 and 2008.

In the present case, the Complainant is assisted by the fact that he maintains a website, LinkedIn page, and Facebook page in his own name, and that he offers services as a consultant and a speaker, under his own name, on a variety of topics. The Panel notes, however, that much of the Complainant’s evidence in this regard comprises self-promotion, and that evidence of, e.g. specific consultancy or speaking engagements has not been produced. It also appears that the Complainant’s primary business activity in connection with the Caason Group is the management of a private family wealth office, although his website does invite contact in connection with potential business partnerships in addition to speaking or advisory engagements.

On balance, however, the Complainant has satisfied the Panel, albeit by a narrow margin, that he has obtained unregistered or common law rights in respect of that trademark.

The Panel takes into account the significant web and social media presence which the Complainant has evidenced, and also that the Complainant's submissions in this regard are unchallenged by the Respondent, which has failed to participate in the proceeding.

The Panel considers, in particular, that the Complainant is not merely known as an individual, but offers consultancy, advisory, speaking, and other business-related services under his personal name via inter alia the <craigastill.com.au> domain name, thereby using CRAIG ASTILL in a commercial source-identifying manner.

Furthermore, in connection with section 3.1 of [WIPO Overview 3.1](#), while targeting alone cannot give rise to trademark rights where none exist, the Respondent's deliberate impersonation of the Complainant (see below) supports the inference that the name CRAIG ASTILL had sufficient commercial significance to function as an identifier associated with the Complainant. In particular, the Respondent's impersonation of the Complainant demonstrates that the Respondent believed recipients would recognise the CRAIG ASTILL name as identifying the Complainant's services and business activities

The disputed domain name is identical to the Complainant's unregistered CRAIG ASTILL trademark, and the Panel therefore finds the first element under the Policy to have been established.

## **B. Rights or Legitimate Interests**

As is established by the evidence available to the Panel, the disputed domain name has been used by the Respondent, from a date shortly following its registration, for the purpose of email communications falsely purporting to emanate from the Complainant himself, and calculated to damage his professional standing and relationships.

Such conduct on the part of the Respondent constitutes impersonation of the Complainant, which cannot give rise to rights or legitimate interests in the disputed domain name for the purposes of the Policy. The Respondent's use of the disputed domain name is deceptive and not merely nominative, and is therefore incapable of constituting either bona fide commercial use, or legitimate noncommercial or fair use, of the disputed domain name.

The Panel therefore finds the second element under the Policy to have been established.

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

It is clear, furthermore, that the disputed domain name was both registered and has been used in bad faith, namely,

The Respondent plainly knew of the Complainant when registering the disputed domain name, and registered it for the purpose of passing itself off as the Complainant through deceptive email communications.

The Respondent has, moreover, used the disputed domain name for the purpose of misleading email recipients into believing that emails received from the Respondent, by way of mail servers configured upon the disputed domain name, had in fact emanated from the Complainant.

The Panel therefore finds that third element under the Policy has also 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 name <craigastill.com> be transferred to the Complainant.

*/Steven A. Maier/*

**Steven A. Maier**

Sole Panelist

Date: September 9, 2026