

ADMINISTRATIVE PANEL DECISION

Luke Littler Darts Limited v. Max Merritt
Case No. D2026-3627

1. The Parties

The Complainant is Luke Littler Darts Limited, United Kingdom, represented by Sheridans Solicitors, United Kingdom.

The Respondent is Max Merritt, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <lukethenukelittler.com> is registered with IONOS SE (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 13, 2026. On August 14, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 17, 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 18, 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 amended Complaint on August 20, 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 Respondent of the Complaint, and the proceedings commenced on August 24, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 13, 2026. The Response was filed with the Center on September 15, 2026, the Respondent having requested an automatic four-day extension of time for submitting his Response in accordance with paragraph 5(b) of the Rules.

The Center appointed Steven A. Maier as the sole panelist in this matter on September 23, 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 Complainant submitted an unsolicited supplemental filing on September 28, 2026.

4. Factual Background

The Complainant is a service company operated on behalf of Mr. Luke Littler. Luke Littler is a professional darts player, who is ranked as the world's number one by the Professional Darts Corporation (the "PDC") at the date of this Decision. Mr. Littler's established nickname within the darts community is "Luke the Nuke Littler".

The Complainant is the owner of registrations for the trademarks LUKE LITTLER and LUKE THE NUKE LITTLER. Those registrations include United Kingdom trademark registration number UK00004079465 for the word mark LUKE THE NUKE LITTLER, registered on October 18, 2024 in numerous International Classes.

The Complainant operates a website at "www.lukelittler.co.uk".

The disputed domain name was registered on January 2, 2026.

The Complainant produces evidence that, on May 12, 2026, the disputed domain name resolved to a website headed "Luke the Nuke Littler" with a dartboard logo. The homepage of the website appeared to include contemporaneous professional darts news stories (although not concerning Mr. Littler). The website offered the navigation links: "Darts News", "Player Profiles", "Tournaments", "History & Trivia", "Rules & Scoring", "Tips & Techniques", "Equipment & Gear", and "Shop". The "Shop" section included what appeared to be links to 135 priced products, including darts, dartboards and accessories from a variety of manufacturers.

The Respondent's website appears to have been suspended by the Registrar on or about June 29, 2026, following a complaint from the Complainant.

5. Parties' Contentions

A. Complainant

The Complainant states that Luke Littler is highly internationally renowned, having won titles including the PDC World Championship in 2025 and 2026, and having obtained the latest such accolade aged only 18.

The Complainant submits that the nickname and mark LUKE THE NUKE LITTLER is of significant importance in the darts world, as establishing the player's brand and identity, maintaining individuality, increasing showmanship, and providing commercial opportunities.

The Complainant submits that, in addition to the official website referred to above, it maintains social media accounts as follows:

- an Instagram account named "@lukethenukelittler" with over two million followers;
- a TikTok account named "@lukethenukelittler" with over one million followers;
- a Facebook account named "LukeTheNuke180" with over 420,000 followers; and

- an X account named "LukeTheNuke180" with almost 300,000 followers.

The Complainant states that Mr. Littler is represented by Target Sports Limited (trading as Target Darts), which is a manufacturer and professional darts agency. The Complainant produces evidence of a range of merchandise, including darts, dartboards, clothing and accessories, supplied by Target Darts and endorsed by Mr. Littler.

The Complainant refers to other sponsorships and commercial arrangements into which Mr. Littler has entered, including a partnership with Xbox.

The Complainant contends that, as a result of the above matters, the trademarks LUKE LITTLER and LUKE THE NUKE LITTLER have become highly distinctive of the Complainant and Mr. Littler worldwide.

The Complainant contends that it 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 or confusingly similar to a trademark in which it has rights. It states that the disputed domain name represents an identical reproduction of the LUKE THE NUKE LITTLER trademark, together with the Top-Level Domain ("TLD") ".com". It contends that the disputed domain name includes no additional descriptive or distinguishing features that might differentiate it from the trademark in question.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It states that it has never authorized the Respondent to use the LUKE THE NUKE LITTLER trademark, and that the Respondent has not been known by any name corresponding to the disputed domain name. The Complainant asserts that the Respondent has no connection with professional darts, and produces evidence by way of a trade press article - "He Turned Window Cleaning Into a Local Success Story! The Max Merritt Interview" - that the Respondent is in fact known for his window cleaning business.

The Complainant anticipates that the Respondent may claim to be using the disputed domain name to operate a genuine fan site. It submits that any such claim is contradicted by the disputed domain name being identical to the Complainant's trademark, which creates a high risk of implied affiliation with the Complainant. The Complainant submits that the Respondent does not adopt any term such as "fan", "fan club" or "unofficial" which might identify his website as a fan site. Nor does the Respondent operate any related social media fan accounts, any online forum, or provide any contact details for information sharing or discussion between Internet users.

The Complainant further contends that the Respondent's website has imitated the Complainant, not only by using the LUKE THE NUKE LITTLER mark, but also by adopting a yellow and purple colourway which is associated with Mr. Littler's brand. The Complainant submits that these matters evidence deliberate targeting of the Complainant, by attempting to create a false association between the Respondent's website and Mr. Littler.

The Complainant submits that the Respondent's website is intended in reality for commercial gain. It contends that, despite the disputed domain name, the website is not related to Mr. Littler specifically, but to darts generally. Furthermore, the website offers third-party darts-related products for sale, via Amazon affiliate links, which compete with the merchandise endorsed by the Complainant. The Complainant contends that the commercial activity carried on by the website cannot be regarded as "incidental" to any noncommercial activity, in view of the high volume of affiliate links included. It submits that, insofar as the Respondent includes any darts-related "news" on the website, this may have been included as a pretext, and does not in any event indicate a fan site.

The Complainant submits that the disputed domain name was registered and is being used in bad faith.

The Complainant contends that the Respondent was obviously aware of the Complainant and Mr. Littler when he registered the disputed domain name. It points to the use by the Respondent of Mr. Littler's yellow and purple colourway, and adds that the disputed domain name was registered on January 2, 2026, at the height of the World Darts Championship and when Mr. Littler was on course for an historic win. The Complainant states that the disputed domain name has no meaning other than to refer to Mr. Littler, and asserts that the Respondent's only purpose in registering the disputed domain name can have been to impersonate the Complainant for commercial gain.

The Complainant reiterates that the Respondent has used the disputed domain name for the purpose of a website selling competitor products via Amazon affiliate links. It contends that such activity diverts sales away from the Complainant and disrupts its business.

The Complainant repeats that the disputed domain name cannot credibly have been chosen for the purposes of a fan or news site, since it lacks any additional element such as "unofficial" or "news" and, moreover, adopts the TLD ".com", which is apt to confuse Internet users into believing it must be operated by the Complainant's legitimate United States affiliate. It adds that the Respondent's website omits any disclaimer or other information to make clear that it is not related to or associated with the Complainant.

The Complainant requests the transfer of the disputed domain name.

B. Respondent

The Respondent submits that he operates a window cleaning business, and that the website linked to the disputed domain name represented a personal side project rather than his principal commercial activity. He accepts that the disputed domain name was selected during the World Darts Championship, and submits that the idea of a website was devised while watching the darts with his young daughter, who particularly enjoyed watching Luke Littler. He states that he conceived of the website as a genuine fan/news project that he could develop over time with family involvement.

The Respondent exhibits evidence which he claims to support his intention of developing a genuine fan or news site. This evidence includes:

- a Fiverr message from the Respondent to a web developer dated January 1, 2026, stating: "I'm looking to start a darts blog initially, going for the basic package on rss feed", and identifying BBC Sport, Sky Sports, and DartsNews as potential news sources;
- order details from the web developer, headed "Full AutoNews Website Design with 7 Categories and Daily Posts";
- a further Fiverr message from the web developer, referring to "Completely AI News Autoblog Website", and containing a reference to "The Shop Page (Posts Products Daily)";
- Instagram account details referring to the disputed domain name (although including no other account information); and
- a Facebook page entitled "Luke Littler Darts Fans – the Nuke Nation".

The Respondent states that the Instagram account referred to above was named "lukethenukelittlerfans" and was created on the same day as he registered the disputed domain name. He submits that this, and the documents referred to above, are reliable evidence of his true intentions in registering the disputed domain name, namely for use as a "darts blog". He states that the Facebook page linked on January 7, 2026, to an article entitled "Who Are The Best Female Darts Players", which confirms his intentions of publishing "general darts editorial content", and contradicts the Complainant's claim that he operated no social media accounts related to the disputed domain name.

The Respondent states that, while he accepts responsibility for material appearing on his website, he relied heavily on the web developer for the website build, as he did not have the relevant technical expertise. He submits that the Complainant is seeking to infer bad faith from what was an unfinished website, including automated features, and that the preliminary website never became an established online operation. He provides a Google Analytics report showing approximately 1,100 new users (before the website was suspended), an average engagement time of approximately 8 seconds, and zero purchase revenue. The Respondent comments that developer testing will have accounted for some of the visits in question. He also exhibits an Amazon Associates communication dated July 2, 2026, notifying him that his Amazon Associates account has been closed owing to lack of activity.

The Respondent accepts that the disputed domain name is an exact match for the Complainant's LUKE THE NUKE LITTLER trademark, and that these circumstances may imply sponsorship or endorsement. He contends, however, that credible evidence of an investment in website development, a genuine plan, and other relevant circumstances may point away from cybersquatting. The Respondent submits that the evidence of the web developer's instructions, together with the operation of related social media accounts, support this approach.

The Respondent accepts that the preliminary build of his website should have been clearer, and should in particular have included a prominent statement that it was not affiliated with Luke Littler or the Complainant. He contends, however, that these matters do not establish cybersquatting, particularly where the website navigation included broad informational categories such as darts news, player profiles and tournaments. He also indicates his willingness to address these matters in any future iteration of the website.

While the Respondent concedes that the product links appearing on the website cannot be ignored, he states that the "Shop Page" functionality was an automated feature that formed part of the package supplied by the third-party web developer. The Respondent adds that, as recognized in section 2.5.3 of WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), fair use need not always be categorically noncommercial in nature, and that a case-specific assessment needs to be made in every instance. He also relies on the decision in *Samsung Electronics Co., Ltd. v. Kunal Gangar*, WIPO Case No. [D2013-0578](#), as authority for the proposition that limited commercial advertising on an enthusiast/community website does not automatically establish bad faith.

The Respondent expressly denies having registered or used the disputed domain name in bad faith. He states that he has never approached the Complainant or anyone associated with Luke Littler seeking payment for the disputed domain name, but has on the contrary invested in a web development project. He contends that his communications with the web developer date from six months prior to any notice of the present dispute, and were not therefore subsequently devised as a self-serving explanation.

The Respondent cites the decision in *Giochi Preziosi S.P.A. v. VGMD NetWeb S.L.*, WIPO Case No. [D2009-0542](#), as authority for the proposition that, even where a disputed domain name is identical to the complainant's trademark, the circumstances may still indicate that the respondent's purpose was genuinely noncommercial in nature.

The Respondent contends that the product link feature on his website was only one element within a much broader package, and that the Complainant is wrong to suggest that this, or the diversion of the Complainant's customers, was the primary purpose of the website. He points to having received zero affiliate commissions from the website and the minimal public engagement with it. He adds that he did not manually curate a campaign of competing products, and that while the automatically generated material does remain his responsibility, it does not establish commercial targeting of the Complainant's trademark.

The Respondent denies that the inclusion of the ".com" TLD in the disputed domain name was intended to give the impression of an official United States website of the Complainant.

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. Preliminary Issue – Complainant’s Supplemental Filing

The submission of unsolicited supplemental filings is generally discouraged under the UDRP. While the Complainant contends that it should be permitted to address various matters arising from the Response, the Panel does not consider it necessary or appropriate in this case to have regard to the Complainant’s supplemental filing noting, inter alia, the Complaint anticipated and addressed the same matters prior to the Response. In any event, the Panel notes that the supplemental filing, if accepted, would not alter the findings in this case.

B. 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 3.1](#), section 1.7.

The disputed domain name is identical to the Complainant’s LUKE THE NUKE LITTLER trademark, and the first element under the Policy is therefore established.

C. Rights or Legitimate Interests

As set out in paragraph 4(c)(iii) of the Policy, a respondent may be able to establish rights or legitimate interests in respect of a disputed domain name where: “you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.”

While the above circumstances most commonly apply to fan sites or criticism sites related to a complainant, it is well established in prior decisions under the UDRP that such use of a disputed domain name will not be fair if it falsely suggests an affiliation with the trademark owner.

As stated in section 2.5 of [WIPO Overview 3.1](#):

“Fundamentally, a respondent’s use of a domain name will not be considered ‘fair’ if it falsely suggests affiliation with the trademark owner; the correlation between a domain name and the complainant’s mark is often the central starting point to this inquiry.”

Moreover, as further stated in section 2.5.1 of [WIPO Overview 3.1](#):

“Generally speaking, UDRP panels have found that domain names identical to a complainant’s trademark carry a high risk of implied affiliation.”

With regard to the question of commercial activity in connection with a submission of fair use, section 2.5.3 of [WIPO Overview 3.1](#) states:

“In the broadest terms, although panels will weigh a range of case-specific factors [...], judging whether a respondent’s use of a domain name constitutes a legitimate fair use will often hinge on whether the corresponding website content prima facie supports the claimed purpose (e.g., for referential use, commentary, criticism, praise, or parody), is not misleading as to source or sponsorship, and is not a pretext for tarnishment or commercial gain.

[...]

Although specific case factors have led panels to find that fair use need not always be categorically noncommercial in nature, unambiguous evidence that the site is not primarily intended for commercial gain, e.g., the absence of commercial or pay-per-click (PPC) links or references to a respondent’s business, would support a finding of lack of intent to unfairly profit from the complainant’s reputation.”

The Respondent contends that he has rights or legitimate interests in respect of the disputed domain name, despite it being identical to the Complainant’s LUKE THE NUKE LITTLER trademark, and notwithstanding that his website included commercial affiliate links to merchandise competitive with that endorsed by Mr. Littler. The Respondent submits that, despite these matters, the disputed domain name was intended and used primarily for a “darts blog”, being used to distribute “general darts editorial content”.

The Panel does not however find that the evidence of the Respondent’s intentions, or his actual use of the disputed domain name, supports any claim of fair use that overrides the obvious likelihood of implied affiliation arising from the Respondent’s choice of the disputed domain name, being identical to the Complainant’s LUKE THE NUKE LITTLER trademark. Nor does the Panel find that the Respondent’s use of his website for the purpose of commercial affiliate sales links was incidental, as opposed to being a significant purpose of the website. For those reasons, which are discussed in further detail in connection with the third element under the Policy below, the Panel does not accept that the requirements of paragraph 4(c)(iii) of the Policy are met, or that the Respondent has otherwise demonstrated rights or legitimate interests in respect of the disputed domain name for the purposes of the Policy.

Concerning the two prior UDRP cases relied upon by the Respondent, both can be distinguished from the present circumstances. In the *Samsung Electronics* case, the disputed domain name was <samsunghub.com>, and not therefore identical to the complainant’s SAMSUNG trademark. Furthermore, the respondent’s evidence of noncommercial or fair use of the disputed domain name in that case was sufficient to render the website’s inclusion of limited Google AdSense advertising as incidental. In the *Giochi Preziosi* case, while the disputed domain name <gormiti.mobi> was identical to the complainant’s GORMITI trademark, the respondent was already operating an established fan site by reference to that trademark, and there was no commercial use of the disputed domain name.

The second element under the Policy is therefore established.

D. Registered and Used in Bad Faith

The disputed domain name is identical to the Complainant’s LUKE THE NUKE LITTLER trademark, which the Panel finds to be established and widely known as designating Luke Littler and his commercial activities as a professional darts player. The Respondent does not deny his knowledge of Mr. Littler, or that the Complainant enjoyed relevant trademark rights, on the date the disputed domain name was registered. In these circumstances, the Respondent faces significant difficulties in demonstrating that he registered and has used the disputed domain name without the intention of benefitting from an implied affiliation with Mr. Littler and the Complainant.

While the Respondent seeks to displace the inference of bad faith by referring to his plans to develop a “darts blog” website, the Panel does not find the Respondent’s submissions to be persuasive.

First, the Respondent makes no substantial argument that his website was intended to be a fan site dedicated specifically to Luke Littler. Insofar as he claims it was intended to be a “darts blog”, being used to distribute “general darts editorial content”, there is no cogent explanation of why Mr. Littler’s name and the Complainant’s trademark should have been chosen for that website.

Secondly, if and insofar as the Respondent’s website may have been intended to be a fan site dedicated to Luke Littler, the disputed domain name contains no additional or qualifying term, such as “fans” or “unofficial”, that would make its status, and its independence from Mr. Littler and the Complainant, clear. Instead, the disputed domain name directly replicates the Complainant’s LUKE THE NUKE LITTLER trademark without adornment.

Thirdly, the Panel does not find the Respondent’s evidence of his communications with the web developer to be persuasive of an intention to develop a noncommercial website with no significant commercial element. The Respondent purchased a web development package, which certainly included news and blog functionality, but also included “The Shop Page (Posts Products Daily)”, and the web package details provided by the designer also included guidance on how to monetize the website in question.

Fourthly, the Respondent’s published website (whether “preliminary” in nature or not) included no disclaimer or information to make clear that it was independent of, and in no manner affiliated with, Mr. Littler or the Complainant. On the contrary, the website made prominent use of the Complainant’s LUKE THE NUKE LITTLER trademark, together with a logo, and also adopted a yellow and purple colour scheme that was associated with Mr. Littler. In the view of the Panel, these factors can only have been intended to amplify, as opposed to disavow, the impression of a legitimate affiliation with Mr. Littler.

Fifthly, the Respondent’s website offered Amazon affiliate links to a significant range of over 100 darts-related products for sale, many of which appear to have competed with products endorsed by Mr. Littler and his partner, Target Darts. The Panel is not persuaded by the Respondent’s submission that this commercial content was merely a by-product of the developer’s web package, or that the Respondent in fact earned no affiliate commissions from the venture. The fact that the Respondent may have been unsuccessful in the commercial venture in question does not detract from his intentions in embarking on it.

In summary, therefore, the Panel concludes that the Respondent registered the disputed domain name with the intention of targeting the Complainant’s LUKE THE NUKE LITTLER trademark for commercial gain, as opposed to making the claimed noncommercial or fair use of the disputed domain name. The Panel finds in particular that, by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to his website by creating a likelihood of confusion with the Complainant’s trademarks as to the source, sponsorship, affiliation, or endorsement of his website or of a product or service on his website (paragraph 4(b)(iv) of the Policy).

The third element under the Policy is therefore 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 <lukethenukelittler.com> be transferred to the Complainant.

/Steven A. Maier/

Steven A. Maier

Sole Panelist

Date: October 6, 2026