ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
TGI Fridays Franchisor, LLC v. Arik Hen
Case No. D2025-2094

1. The Parties

The Complainant is TGI Fridays Franchisor, LLC, United States of America ("United States"), represented by Markmonitor, United States.

The Respondent is Arik Hen, Israel.

2. The Domain Name and Registrar

The disputed domain name <tglfriday.com> is registered with Wild West Domains, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 27, 2025. On May 28, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On May 29, 2025, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 3, 2025, 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 June 6, 2025.

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 June 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 2, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 7, 2025.

The Center appointed Emre Kerim Yardimci as the sole panelist in this matter on July 10, 2025. 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 an American casual dining restaurant chain focusing primarily on American cuisine operating more than 461 restaurants in more than 44 countries around the world - from the United States to Europe, Asia, and the Middle East. The Complainant is present on various social media platforms, such as Facebook, where it is followed by more than 6.2 million users

The Complainant is the owner of the following trademark registrations:

- United States Trademark No. 1417077 for T.G.I FRIDAY'S registered on November 18, 1986, duly renewed and covering goods in classes 1, 29, 30, and 32;
- United States Trademark No. 1778205 for T.G.I FRIDAY'S & LOGO registered on June 22, 1993, duly renewed and covering services in class 42;
- United States Trademark No. 2294717 for TGI FRIDAYS registered on November 23, 1999, duly renewed and covering goods in class 29;
- International Registration No. 1207015 for T.G.I FRIDAY'S & LOGO registered on September 16, 2013, covering goods and services in classes 9, 16, 25, 29, 30, 32, 33, 35, and 43.

In addition, the Complainant is the owner of several domain names including the domain name <tgifridays.com> registered on February 8, 1996, which is duly operated as of today.

The disputed domain name was registered on March 27, 2025. The Complainant provided evidence showing that the disputed domain name was used to send an email impersonating the Complainant's Senior Director. The Panel visited the disputed domain name on July 23, 2025, and observed that the disputed domain name does not resolve to an active website.

5. Parties' Contentions

A. Complainant

The disputed domain name is confusingly similar to the Complainant's TGI FRIDAY'S trademark in which it has rights.

The disputed domain name is composed of "tgl" and "friday" with hyphen between them. The Complainant asserts that the substitution of the capital letter "i" with the lower-case letter "l" is a case of typosquatting. Moreover, the fact that the letter "s" is missing at the end of the disputed domain name is also a clearcut typosquatting.

The Complainant claims that the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services and instead the Respondent has intentionally chosen the disputed domain name for phishing purposes. As a matter of fact, the Respondent activated a mail exchanger record ("MX record") and sent fraudulent email to the Complainant's partner in Peru by impersonating themselves as the Complainant's responsible person (Senior Director of Assets Management) where the signature of the email displaying the official Complainant's domain name <tgifridays.com>.

At the time the disputed domain name was registered, the Respondent targeted the Complainant's well-known trademark TGI FRIDAY'S. The registration of the disputed domain name with intentional misspelling of the Complainant's trademark and its website "www.tgifridays.com" is clear indication of bad faith registration.

Lastly, the Complainant's asserts that the use of an email address associated with the disputed domain name, to send a phishing email for fraudulent purposes is in itself evidence that the disputed domain name is being used in bad faith.

B. Respondent

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

6. Discussion and Findings

In accordance with paragraph 4(a) of the Policy, for this Complaint to succeed in relation to the disputed domain name, the Complainant must prove the followings:

(i) that the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;

(ii) that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and

(iii) that the disputed domain name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

A registered trademark provides a clear indication that the rights in the mark shown on the trademark certificate belong to its respective owner. As indicated above, the Complainant holds several trademark registrations.

The disputed domain name is confusingly similar to the Complainant's mark TGI FRIDAY'S where the capital letter "i" on TGI is replaced by the lowercase letter "l". Moreover, the letter "s" is missing on the disputed domain name. The Panel agrees that the disputed domain name is a clear case of typosquatting. See section 1.9 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.0").

As regards the generic Top-Level Domain ("gTLD") ".com", it is typically disregarded under the confusing similarity test.

Accordingly, the Panel holds that the disputed domain name is confusingly similar for the purposes of the Policy with a trademark in which the Complainant has rights. As such the Panel holds that paragraph 4(a)(i) of the Policy has been satisfied.

B. Rights or Legitimate Interests

The onus is on the Complainant to make out at least a prima facie case that the Respondent has no rights or legitimate interests in the disputed domain name, and it is then for the Respondent to rebut this case. See section 2.1 of the WIPO Overview 3.0.

The Panel accepts the Complainant's submissions that the Respondent does not appear to be commonly known by the disputed domain name, has not used, or made demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods or services, is not making a legitimate noncommercial or fair use of the disputed domain name.

The Respondent has not filed a Response.

The use of a domain name for illegal activity cannot confer rights or legitimate interests on the Respondent. Section 2.13 of the WIPO Overview 3.0.

The Complainant has made out its prima facie case under this element of the Policy and the Respondent has failed to rebut it.

Accordingly, the Complainant succeeds in relation to the second element of the Policy.

C. Registered and Used in Bad Faith

The Panel accepts the Complainant's assertions that the trademark TGI FRIDAY'S is a well-known trademark. The incorporation of a well-known trademark's typo into the disputed domain name by a registrant having no plausible explanation for doing so, in and of itself, creates a presumption of bad faith.

The Panel accepted the Complainant's evidence showing that their partner received a fraudulent email from an email address connected to the disputed domain name for phishing purposes. The fact that the Respondent is using the disputed domain name to mislead recipients into thinking that they are receiving the emails from the Complainant clearly shows the ill-intention of the Respondent and it is, therefore, without any doubt that this fraudulent email to Complaint's partner in Peru is blatant attempt to profit from the goodwill established by the Complainant and may cause great damage to the Complainant and its reputation.

Panels have held that the use of a domain name for illegitimate activity here, claimed as applicable to this case: phishing, impersonation/passing off, or other types of fraud, constitutes bad faith. WIPO Overview 3.0, section 3.4.

Therefore, the Panel is convinced that that the Respondent has registered and is using the disputed domain name in bad faith.

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 <tglfriday.com> be transferred to the Complainant.

/Emre Kerim Yardimci/
Emre Kerim Yardimci
Sole Panelist
Date: July 23, 2025