

## **ADMINISTRATIVE PANEL DECISION**

1st Franklin Financial Corporation v. li houchang  
Case No. D2025-4328

### **1. The Parties**

The Complainant is 1st Franklin Financial Corporation, United States of America ("United States"), represented by Troutman Pepper Locke LLP, United States.

The Respondent is li houchang, China.

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

The disputed domain name <www1ffc.com> is registered with Sav.com, LLC (the "Registrar").

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 22, 2025. On October 22, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 22, 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 ("Registrant contact") and contact information in the Complaint. The Center sent an email communication to the Complainant on October 23, 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 October 23, 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 October 27, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 16, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on November 17, 2025.

The Center appointed Andrea Mondini as the sole panelist in this matter on November 19, 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 was founded in 1941 and is a consumer-finance company specializing in personal installment lending and retail sales financing services delivered through a network of 375 local branch offices and online.

The Complainant owns several trademark registrations, including:

TRADEMARK	JURISDICTION	REGISTRATION NUMBER	REGISTRATION DATE	INTERNATIONAL CLASS
1ST FRANKLIN FINANCIAL	United States	6,792,087	July 19, 2022	36
	United States	6,580,968	December 7, 2021	36
	United States	1,357,167	August 27, 1985	36

The Complainant holds the domain name <1ffc.com> which was registered in 1996 and hosts its main website.

Because the Respondent did not file a Response, not much is known about the Respondent.

The disputed domain name was registered on November 24, 2018.

According to the evidence submitted with the Complaint, the disputed domain name redirects to a website where the disputed domain name is offered for sale.

#### 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 name.

Notably, the Complainant contends as follows:

The Complainant owns a range of trademark registrations for its 1st Franklin Financial Corporation flagship marks. In its ordinary course of business, the Complainant prominently uses "1FFC" as the shorthand brand mark which stands for "1st Franklin Financial Corporation". This shorthand brand mark has been widely used since 1996, e.g. in the Complainant's domain name <1ffc.com> which resolves to the Complainant's official website, on the Complainant's social media accounts and marketing materials, and to identify the

Complainant in its banking licensing disclosures. As a result of its exclusive use and substantial advertising and promotion, the Complainant owns rights in the acronym “1FFC”.

The disputed domain name is confusingly similar to the 1FFC trademark in which the Complainant has rights, because it incorporates this mark in its entirety, and the addition of the false prefix “www” (not followed by a dot) constitutes typosquatting and is not sufficient to prevent a finding of confusing similarity.

The Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent has not been authorized by the Complainant to use this trademark, is not commonly known by the disputed domain name, and has no fair use or legitimate interest in the disputed domain name or in the Complainant’s mark.

The disputed domain name was registered in bad faith because it is obvious that the Respondent had knowledge of both the Complainant and its mark 1FFC at the time it registered the disputed domain name. Indeed, its use of the “www” typosquatting prefix is evidence of bad faith because it demonstrates that the Respondent knew about the Complainant’s 1FFC mark and its legitimate <1ffc.com> domain name. This further shows that the Respondent was attempting to free ride on the significant goodwill created by the Complainant in this mark by mimicking the Complainant or at least implying an affiliation with the Complainant and its products and services, which in fact does not exist.

## **B. Respondent**

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

## **6. Discussion and Findings**

According to paragraph 4(a) of the Policy, in order to succeed, a complainant must establish each of the following elements:

- (i) the disputed domain name is identical or confusingly similar to the 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**

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 Selected UDRP Questions, Third Edition, ([“WIPO Overview 3.0”](#)), section 1.7.

The term “trademark or service mark” as used in UDRP paragraph 4(a)(i) encompasses both registered and unregistered (sometimes referred to as common law) marks. To establish unregistered or common law trademark rights for purposes of the UDRP, a complainant must show that its mark has become a distinctive identifier which consumers associate with the complainant’s goods and/or services. [WIPO Overview 3.0](#), section 1.1.1. and 1.3. In comparable cases, panels have found unregistered trademark rights in common abbreviations of a complainant’s trademark. See *Equinor ASA v. ADAUCTO RODRIGUES P FILHO*, WIPO Case No. [D2024-4944](#), and *American Farm Bureau Federation v. Portfolio16 Management Ltd.*, WIPO Case No. [D2023-1310](#).

The Complainant has shown that it has extensively used the abbreviation “1FFC”, which stands for its corporate name “1st Franklin Financial Corporation”, for almost three decades in its domain name <1ffc.com> which resolves to the Complainant’s official website, on its social media accounts, in marketing materials and to identify the Complainant in its banking licensing disclosures. The Complainant has thus shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the entirety of the mark 1FFC is reproduced within the disputed domain name.

The addition of the letters “www” (without a dot) to the disputed domain name is considered as a case of typosquatting and does not prevent a finding of confusing similarity under the Policy. [WIPO Overview 3.0](#), sections 1.8 and 1.9

The addition of the generic Top-Level Domain (“gTLD”) “.com” in the disputed domain name is a standard registration requirement and as such may be disregarded under the confusing similarity test under the Policy, paragraph 4(a)(i). [WIPO Overview 3.0](#), section 1.11.1.

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 for a complainant to prove 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 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name.

The Respondent has not rebutted the 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.

Furthermore, the composition of the disputed domain name itself, so closely resembling the Complainant’s official website with the mere omission of the dot after the “www” prefix, suggests that the Respondent registered the disputed domain name with the intent to profit off the Complainant’s trademark and domain name, which prevents a finding of rights or legitimate interest.

Based on the available record, the Panel finds the second element of the Policy has been established.

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

The Panel notes that, for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

In the view of the Panel, noting that the Complainant's use of the mark 1FFC predates the registration of the disputed domain name and considering the "www" prefix typosquatting, it is very unlikely that the Respondent could have registered the disputed domain name without knowledge of the Complainant's mark as used in the Complainant's <1ffc.com> domain name which resolves to its official website. In the circumstances of this case, this is evidence of registration in bad faith.

The disputed domain name resolves to a website where the disputed domain name is offered for sale. Such use, in the circumstances of this case, is indicative of bad faith in the sense of Policy, paragraph 4(b)(i). Moreover, considering that the disputed domain name is an obvious typosquatting of the Complainant's official website "www.1ffc.com", a legitimate good faith use of the disputed domain name seems rather unlikely. The Panel's finding of bad faith here is further supported by the Respondent's lack of explanation for the registration and use of the disputed domain name.

Based on the available record, the Panel finds that the Complainant has established the third element of the Policy with regard to the disputed domain name.

## **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 <www1ffc.com> be transferred to the Complainant.

*/Andrea Mondini/*

**Andrea Mondini**

Sole Panelist

Date: December 2, 2025