

## **ADMINISTRATIVE PANEL DECISION**

Télévision Française 1 v. Jean loup Le loup  
Case No. D2025-4435

### **1. The Parties**

The Complainant is Télévision Française 1, France, represented by AARPI Scan Avocats, France.

The Respondent is Jean loup Le loup, France.

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

The disputed domain name <tf1-news.info> is registered with Hostinger Operations, UAB (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 28, 2025. On October 28, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 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 (No data) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 29, 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 November 3, 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 November 5, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 25, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on November 27, 2025.

The Center appointed Elise Dufour as the sole panelist in this matter on December 9, 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 Télévision Française 1, commonly known as TF1, a French company founded in 1974 and active in the production and broadcasting of television programs. It operates the first and oldest television channel in France and is one of the leading players in the European audiovisual sector.

In 1987, the Complainant integrated the TF1 Group, which includes several generalist and thematic television channels, including TF1, as well as production and distribution companies for the film and television industries. Since then, it has continuously expanded, both in France and internationally. It is today one of the most watched television channels in Europe.

In parallel with its broadcasting activities, the Complainant has developed a significant digital presence. In particular, it operates online platforms providing replay and video-on-demand services, including the service currently branded “TF1+”. The Complainant promotes its activities through its official websites, including those accessible at “www.tf1.fr” and “www.groupe-tf1.fr”.

The Complainant owns numerous trademarks consisting in all or in part of the acronym TF1, both in France and internationally, such as:

- International semi-figurative trademark  no. 556537 in classes 9, 16, 25, 28, 35, 38, and 41, registered on July 30, 1990;

- French semi-figurative trademark  no. 1489724 in all classes, registered on November 30, 1988.

The disputed domain name was registered on October 20, 2025.

At the time of the filing of the Complaint, the disputed domain name resolved to a website reproducing the appearance and content of the Complainant’s official news website, including use of the designation “TF1 INFO”. The website displayed purported news articles and content promoting financial services, presented as press publications, and prominently reproduced the Complainant’s trademarks and visual identity. The website further contained forms inviting users to provide personal data, including login credentials, in circumstances indicating phishing and fraudulent activity.

At the date of this Decision, the disputed domain name no longer resolves to such content and instead points to a page displaying the following notice:

“Website Takedown Notice

This website has been taken down by Lovable’s Trust & Safety team. If you see suspicious sites on the \*.lovable.app domain that attempt to steal data, impersonate others, or distribute malware, please report them immediately to [...]@lovable.dev.”

#### 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 that the disputed domain name is confusingly similar to its well-known trademark TF1.

The disputed domain name wholly incorporates the TF1 trademark, with the mere addition of the descriptive term “news” and the generic Top-Level Domain “.info”. According to the Complainant, these elements do not

dispel confusion; on the contrary, the term “news” directly refers to the Complainant’s core activity in television news broadcasting and reinforces the likelihood of confusion.

Second, the Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent is not commonly known by the disputed domain name and has no trademark or other rights in the designation “TF1”. The Complainant has never authorized, licensed, or otherwise permitted the Respondent to use its trademark. The Complainant further contends that the use of the disputed domain name in connection with a website impersonating the Complainant’s official news platform and promoting fraudulent financial services cannot constitute a bona fide offering of goods or services, nor a legitimate non-commercial or fair use.

Third, the Complainant asserts that the disputed domain name was registered and is being used in bad faith. Given the longstanding and strong reputation of the TF1 trademark, the Complainant maintains that the Respondent could not have been unaware of the Complainant’s rights at the time of registration. The Complainant argues that the Respondent intentionally registered the disputed domain name in order to create a false association with the Complainant and to attract Internet users for commercial gain through deception. The use of the disputed domain name to reproduce the Complainant’s visual identity, publish fake news articles, and collect personal data for fraudulent purposes is, according to the Complainant, clear evidence of bad faith registration and use within the meaning of paragraph 4(b) of the Policy.

## **B. Respondent**

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

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

The Complainant has 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 entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms (here, “news”) may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

The Panel observes that the disputed domain name <tf1-news.info> wholly incorporates the Complainant’s distinctive and well-known trademark TF1. The additional term “news” is a descriptive term that directly refers to the Complainant’s core activity in the field of television news and information broadcasting. The generic Top-Level Domain “.info” is disregarded for the purpose of the confusing similarity assessment, as it is a technical requirement of domain name registration. [WIPO Overview 3.0](#), section 1.11.1.

The Panel finds that 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 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.

The Panel notes that the Respondent is not affiliated with the Complainant in any way and has not been authorized or licensed to use the Complainant’s TF1 trademark, whether as a domain name or otherwise. There is no evidence that the Respondent has been commonly known by the disputed domain name or that it holds any trademark or other rights in the designation “TF1”.

Further, the use of the disputed domain name in connection with a website impersonating the Complainant’s official news platform, reproducing its trademarks and visual identity, and promoting fraudulent financial services cannot constitute a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy. Nor can such use be characterized as a legitimate non-commercial or fair use within the meaning of paragraph 4(c)(iii) of the Policy.

Panels have held that the use of a domain name for illegal activity, here phishing, impersonation/passing off, and fraud, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

The Panel therefore finds that the Respondent has no rights or legitimate interests in the disputed domain name.

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.

In the present case, the Panel notes that the Respondent has intentionally registered and used the disputed domain name in order to create a likelihood of confusion with the Complainant’s TF1 trademark, with a view to attracting Internet users for commercial gain. Such conduct falls squarely within the scope of paragraph 4(b)(iv) of the Policy.

The record shows that the disputed domain name wholly incorporates the Complainant’s well-known TF1 trademark together with the descriptive term “news”, which directly refers to the Complainant’s core activity. At the time of registration, the Complainant’s trademark enjoyed a strong reputation, and the Panel finds it

implausible that the Respondent was unaware of the Complainant or its rights when registering the disputed domain name.

The disputed domain name was resolving to a website impersonating the Complainant's official news platform, reproducing its trademarks and visual identity, and publishing purported news articles promoting fraudulent financial services. The website further included forms designed to collect users' personal data, indicating phishing and fraud. Such use demonstrates a clear intent to mislead Internet users into believing that the website was operated by, or affiliated with, the Complainant.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

Panels have held that the use of a domain name for illegal activity, here phishing, impersonation/passing off, and fraud, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

The Panel further notes that the fact that, at the time of this Decision, the disputed domain name no longer resolves to the fraudulent website but instead points to a takedown notice does not prevent a finding of bad faith. Panels have consistently held that the subsequent suspension or deactivation of a domain name does not cure prior bad faith registration and use.

In view of the foregoing, the Panel finds that the Respondent registered and used the disputed domain name in bad faith.

The Panel finds that the 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 <tf1-news.info> be transferred to the Complainant.

*/Elise Dufour/*

**Elise Dufour**

Sole Panelist

Date: December 26, 2025