

ADMINISTRATIVE PANEL DECISION

JFF Publications, LLC v. Ogandi Peraza
Case No. D2026-2620

1. The Parties

The Complainant is JFF Publications, LLC, United States of America ("US"), represented by ADSTO, France.

The Respondent is Ogandi Peraza, Estonia.

2. The Domain Name and Registrar

The disputed domain name <justforfans.app> is registered with CloudFlare, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 16, 2026. On June 17, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 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 (Unknown registrant / Privacy service Cloudflare Inc.) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 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 amendment to the Complaint on June 19, 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 June 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 13, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 27, 2026.

The Center appointed Rebecca Slater as the sole panelist in this matter on August 4, 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.

4. Factual Background

The Complainant is a Delaware limited liability company headquartered in Wilton Manors, Florida, US. The Complainant operates an online platform at the domain name <justfor.fans> (registered January 19, 2018). The platform provides subscription-based online services allowing creators to publish and monetize digital content. The platform has a large international user base, particularly in North America and Europe.

The Complainant contends it has used the unregistered trade mark JUSTFORFANS in connection with its online platform services since at least February 2018. The account name for Complainant's official account on X is "JustForFans". The account has been active since 2018 and is the Complainant's primary marketing channel.

The Complainant is the owner of several registrations for the JUSTFOR.FANS word mark in multiple jurisdictions, including: US Trade Mark Registration No. 8098250 (registered January 13, 2026, with a date of first use in commerce of February 14, 2018); France Trade Mark Registration No. 24 5105743 (registered June 27, 2025); United Kingdom Trade Mark Registration No. 00003978174 (registered February 16, 2024); and Canada Trade Mark Registration No. 2292544 (registered November 7, 2025) ("Trade Mark").

The disputed domain name was registered on July 7, 2021.

The Respondent is an individual apparently located in Estonia. The Respondent did not submit a response, and, consequently, little information is known about the Respondent.

The disputed domain name resolves to a website offering services that are identical or highly similar to those offered by the Complainant on its platform at the domain name <justfor.fans>.

The Complainant has identified an organization potentially connected to the Respondent as the owner of an Estonian trade mark registration for JUSTFORFANS (Registration No. M202200491, registered March 6, 2023).

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 the Trade Mark. The disputed domain name reproduces in its entirety the distinctive element of the Trade Mark. The omission of the dot between "for" and "fans" does not prevent a finding of confusing similarity, as domain names are generally perceived by Internet users as continuous strings of characters. The addition of the generic Top-Level Domain ".app" is insufficient to distinguish the disputed domain name and, on the contrary, reinforces the misleading impression by suggesting an official application associated with the Complainant's platform.
- 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 not been authorized, licensed, or otherwise permitted by the Complainant to use "justforfans" or any similar designation. The disputed domain

name is used to offer services that are identical or highly similar to those offered by the Complainant, which does not constitute a bona fide offering of goods or services. The Complainant has identified a third party as the owner of an Estonian trade mark registration for “justforfans” (registered March 6, 2023). To the extent that the Respondent seeks to rely on that Estonian trade mark, the trade mark was registered after the disputed domain name and several years after the Complainant began operating its platform. A corresponding European Union Trade Mark application was rejected on February 14, 2025.

- The disputed domain name was registered and is being used in bad faith. The disputed domain name was registered more than three years after the Complainant registered and began using its domain name <justfor.fans>. Given the highly specific composition of the disputed domain name and the Respondent's operation in the same field of activity and industry recognition, it is inconceivable that the disputed domain name was registered without knowledge of the Complainant and its platform. The Respondent has used the disputed domain name to offer competing services, resulting in actual confusion among Internet users. This amounts to intentional targeting of the Complainant's rights for commercial gain. The subsequent filing of the Estonian trade mark, if attributable to the Respondent, constitutes additional evidence of bad faith as an attempt to legitimise an earlier abusive registration.

B. Respondent

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

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all the elements enumerated in paragraph 4(a) of the Policy have been satisfied, namely:

- the disputed domain name is identical or confusingly similar to a trade mark or service mark in which the Complainant has rights;
- the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- the disputed domain name has been registered and is being used in bad faith.

The onus of proving these elements is on the Complainant.

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 trade mark and the disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 1.7.

The Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the Trade Mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the Trade Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7. The fact that the disputed domain name does not include the full-stop between “for” and “fans” does not hinder this finding, as the full-stop cannot be included in domain names at the second level for technical reasons.

The “.app” Top-Level Domain of the disputed domain name is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

For completeness, the Panel finds for purposes of the Policy that the Complainant has established unregistered trade mark rights in JUSTFORFANS that pre-date the registration of the disputed domain name and that the disputed domain name is identical to that unregistered mark. [WIPO Overview 3.1](#), sections 1.3, 1.7, and 1.8.

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 proving 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 3.1](#), 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 composition of the disputed domain name carries a high risk of implied affiliation. [WIPO Overview 3.1](#), section 2.5.1. The Complainant has not authorized the Respondent to use the Trade Mark and there is no evidence that the Respondent has ever been commonly known by the disputed domain name.

Panels have held that the use of a domain name for illegal activity (here, claimed passing off) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

While the Panel notes the above-referenced registered Estonian trade mark, the Panel finds that the mere existence of such mark is insufficient to support a finding of rights or legitimate interests in the present case. To begin, the Respondent has not come forward to claim rights in such mark, registered in the name of a distinct organization. More importantly, in the context of the Complainant’s documented prior, international success in the same sector, earlier use of a nearly identical mark, and user confusion, it appears likely that the Respondent has sought to unfairly take advantage of an association with the Complainant and its brand. Registration of a trademark in these circumstances tends to suggest an intent to mask or legitimize competitive activities taking unfair advantage of the Complainant’s brand, rather than the independent creation of a distinct brand without consideration of the Complainant. In these circumstances, the Panel finds that the Estonian trade mark appears obtained primarily to circumvent the Complainant’s assertion of its rights or otherwise prevent the Complainant’s exercise of its rights (even if only in Estonia). See [WIPO Overview 3.1](#), section 2.12.2.

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.

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 3.1](#), section 3.2.1.

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 finds it unlikely that the disputed domain name was registered without knowledge of the Complainant and its unregistered JUSTFORFANS mark, given the reputation of the Complainant and the composition of the disputed domain name. The Respondent's goal in registering and using the disputed domain name appears to have been to attract Internet users by taking unfair advantage of the Complainant's unregistered mark and reputation for potential gain. This finding is reinforced by the Respondent's use of the disputed domain name to provide a subscription service and platform which is very similar to the Complainant's offering. This amounts to "opportunistic bad faith" under the Policy. As discussed above, the Estonian trade mark is not determinative in this proceeding and tends to suggest an attempt to mask the bad faith targeting of the Complainant or otherwise circumvent or prevent the Complainant's exercise of its rights, rather than independent good faith adoption.

Panels have held that the use of a domain name for illegal activity (here, claimed passing off) constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

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 <justforfans.app> be transferred to the Complainant.

/Rebecca Slater/

Rebecca Slater

Sole Panelist

Date: August 12, 2026