

ADMINISTRATIVE PANEL DECISION

FNF Intellectual Property Holdings, Inc. v. Vu Ngoc Tuan, Vu Ngoc Tuan
Case No. D2026-3898

1. The Parties

The Complainant is FNF Intellectual Property Holdings, Inc., United States of America ("United States"), represented by Lewis Rice, LLC, United States.

The Respondent is Vu Ngoc Tuan, Vu Ngoc Tuan, Viet Nam.

2. The Domain Name and Registrar

The disputed domain name <lawyerstitle-company.com> (the "Disputed Domain Name") is registered with GMO Internet, Inc. d/b/a Onamae.com (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 31, 2026. On September 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On September 2, 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 (C/O GMO-Z.com RUNSYSTEM GMO-Z.com RUNSYSTEM JSC) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 7, 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 September 13, 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 September 15, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 5, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 12, 2026.

The Center appointed Marilena Comanescu as the sole panelist in this matter on October 15, 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, a Delaware corporation, is affiliated with Lawyers Title, a prominent United States provider of title insurance and escrow services. The Complainant has been using the mark LAWYERS TITLE since 1925.

The Complainant is promoting its services on its website at "www.ltic.com", and various social media platforms such as Instagram or LinkedIn.

The Complainant holds trademark rights for LAWYERS TITLE, such as the following:

- the United States Trademark Registration number 3904502 for LAWYERS TITLE (word), filed on July 29, 2010, registered on January 11, 2011, covering services in International Class 36; and
- the United States Trademark Registration number 4360886 for LAWYERS TITLE (word), filed on November 1, 2012, registered on July 2, 2013, covering services in International Class 36.

The Disputed Domain Name was registered on March 17, 2026, and, at the time of filing the Complaint, it was used in relation to a commercial website, titled "Lawyers Title Company", prominently displaying the LAWYERS TITLE trademark, promoting services related to, inter alia, title insurance services, claiming copyright protection, without listing a disclaimer, or identifying the website operator and its relationship (or lack of) with the Complainant. The website under the Disputed Domain Name lists at the "contact us" section a phone number that corresponds to be based in California, United States and purports to offer professional guidance to secure the financial and legal aspects of the United States immigration process.

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:

- it has made continued and uninterrupted use of the LAWYERS TITLE mark since 1925, and, in addition to its registered rights, the Complainant enjoys additional common law rights in LAWYERS TITLE mark;
- the Disputed Domain Name is confusingly similar to the Complainant's well-known name and trademark. The addition of descriptive word "company" does nothing to meaningfully distinguish the Disputed Domain Name from the Complainant's mark;
- the Respondent has no rights or legitimate interests in the Disputed Domain Name since: (i) the Complainant has not licensed, authorized, or otherwise permitted the Respondent to use the LAWYERS

TITLE name, mark, or any other mark similar thereto, or the Disputed Domain Name, in any capacity; (ii) the Respondent has no rights or legitimate interests with respect to the Disputed Domain Name, the Respondent has never been commonly known by LAWYERS TITLE mark or any variation thereof, nor does the Respondent possess any trademark, service mark, or other proprietary rights in that term or any other name, mark, or term similar to LAWYERS TITLE; and (iii) the Respondent has not used the Disputed Domain Name in connection with a good faith business or activity, instead the Respondent uses the Disputed Domain Name for the purpose of intentionally confusing or misleading users for the Respondent's financial gain; and

- the Respondent registered and is using the Disputed Domain Name in bad faith mainly because: (i) the Respondent registered the Disputed Domain Name more than a decade after the Complainant obtained trademark registrations and a century after the Complainant's claimed first use of the LAWYERS TITLE mark. And thus the Respondent registered the Disputed Domain Name with actual knowledge of the Complainant's well-known trademark and associated business, or, at a minimum, the Respondent had constructive notice of the LAWYERS TITLE mark, due to Complainant's multiple trademark registrations, national reputation, extensive presence, and use of the mark for more than a century; (ii) the website under the Disputed Domain Name is branded "Lawyers Title Company", promotes "Title Insurance and Escrow Services", in addition to immigration-related services throughout the United States, thereby targeting the same industry and geography as the Complainant's LAWYERS TITLE mark and business. This evidences knowledge of the Complainant's rights and intent to create confusion for commercial gain. The Respondent's website mirrors those services and adopts a confusingly similar name, indicating deliberate impersonation and diversion; (iii) the use of the Disputed Domain Name is seemingly calculated to attract persons of means and assets in connection with a fraudulent scheme, such as collecting personal information for identity theft, or seeking wire transfers of retainer fees; and (iv) the Respondent's concealment of its real identity.

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, in order to decide on the remedy sought by the Complainant, each of the following three elements will be examined:

- (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 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. See 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 trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the mark is recognizable within the Disputed Domain Name. Accordingly, the Disputed Domain Name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

While the addition of other terms, here a hyphen and the word “company”, may bear on assessment of the second and third elements, the Panel finds the addition of such elements does not prevent a finding of confusing similarity between the Disputed Domain Name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 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 the 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 3.1](#), 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.

According to the evidence, the Respondent has used the Disputed Domain Name in connection with a website promoting services identical to those of the Complainant and in the same geographical area (the United States), displaying the Complainant’s trademark, presenting itself as being “Lawyers Title Company”, without providing any disclaimer regarding the relationship (in fact the lack thereof) between the Respondent and the Complainant. UDRP panels have held that the use of a domain name for illegitimate activity (such as claimed impersonation/passing off, or other types of fraud) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

The Panel also notes that the composition of the Disputed Domain Name itself carries a risk of implied affiliation given that the Complainant’s trademark has been reproduced in the Disputed Domain Name with an additional word “company”, which falsely may suggest that the respective website is the Complainant’s official company web address.

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 Disputed Domain Name was registered in bad faith, with knowledge of the Complainant and its trademark, name and services, because it fully incorporates the

LAWYERS TITLE mark with a term related to the Complainant's business. Also, the Disputed Domain Name was registered more than 15 years after the Complainant's LAWYERS TITLE trademark registration and a century after the Complainant's first use of such mark. Further, the use of the Disputed Domain Name reinforces such finding.

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.

Paragraph 4(b)(iv) of the Policy provides that the use of a domain name to intentionally attempt "to attract, for commercial gain, Internet users to [the respondent's] website or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of [the respondent's] website or location or of a product or service on [the respondent's] website or location" is evidence of registration and use in bad faith.

By creating a website using the Complainant's mark, displaying the LAWYERS TITLE trademark, offering identical and similar services to those offered by the Complainant in the same geographical area, presenting itself as "Lawyers Title Company", in this Panel's view, the Respondent intentionally sought to attract Internet users accessing the websites at the Disputed Domain Name who may be confused and believe that the website is held, controlled by, or somehow affiliated or related to the Complainant, for its commercial gain.

The use of a domain name for illegal activity such as claimed impersonation/passing off, fraud, can never confer rights or legitimate interests on a respondent and it is considered evidence of bad faith. [WIPO Overview 3.1](#), section 3.4.

The Panel finds the third element of the Policy has been 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, <lawyertitle-company.com>, be transferred to the Complainant.

/Marilena Comanescu/

Marilena Comanescu

Sole Panelist

Date: October 27, 2026