ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
VS Media, Inc. v. Antonin Stoeckel
Case No. D2026-4498

1. The Parties

The Complainant is VS Media, Inc., United States of America ("United States"), represented by Safenames Ltd, United Kingdom.

The Respondent is Antonin Stoeckel, France.

2. The Domain Name and Registrar

The disputed domain name <flirt4-free.com> is registered with Spaceship, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 5, 2026. On October 5, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 6, 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 (Privacy service provided by WITHHELD FOR PRIVACY LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 6, 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 amended Complaint on October 7, 2026.

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 8, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 28, 2026. The Respondent did not file a Response, but indicated willingness to enter a settlement. In light of this, the Center informed the Parties that a settlement would be possible and that the proceedings could be suspended. Once the deadline for filing a Response had passed and the Parties had not responded regarding the settlement, the Center informed the Parties that it would proceed to panel appointment on October 29, 2026.

The Center appointed Willem J. H. Leppink as the sole panelist in this matter on November 5, 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 following facts are undisputed.

The Complainant is an American digital media company specializing in live-web communications. The Complainant was founded in 1996 in Stoughton, Massachusetts by a small group of entrepreneurs. The Complainant owns a network of live-streaming sites and provides online platforms for interactive contact, such as video and chat services.

In December 2008, the Complainant introduced the FLIRT4FREE white-labeling service, enabling affiliates to generate commission by adding the Complainant's technology and live chat features to their websites.

The Complainant's main service is offered under the FLIRT4FREE trademark, which the Complainant has used to identify its adult entertainment website since the company was first launched. The Complainant owns and operates the website "www.flirt4free.com". The domain name <flirt4free.com> was registered on February 10, 1999. The website allows users to browse and interact with thousands of male, female, and transgender models in free chat rooms or via live webcam video and offers a premium "VIP" membership as a paid service, enabling access to Cam2Cam features and private shows. As of August 2026, the website received approximately 3.6 million visits per month. The Complainant has established a social media presence and promotes its services under the FLIRT4FREE name on X (formerly Twitter), Facebook, Instagram, and YouTube.

The Complainant's trademark portfolio covers numerous jurisdictions and includes the United States trademark registration for the word mark FLIRT4FREE, with registration number 2684274 and a registration date of February 4, 2003, registered for services in class 41; and the European Union trademark registration for the word mark FLIRT4FREE, with registration number 014028997 and a registration date of September 9, 2015, registered for services in class 41.

The disputed domain name was registered on June 26, 2026, and previously resolved to a website which uses the FLIRT4FREE name (without hyphenation), a similar logo and similar background colors, as well as offering identical services, including chat services with male, female and transgender models. At the time of rendering this Decision the disputed domain name resolves to an "Index of/" directory listing containing a cgi-bin folder.

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 the following:

The disputed domain name is confusingly similar to the Complainant's FLIRT4FREE Trademark. The disputed domain name encompasses the entirety of the Complainant's FLIRT4FREE mark, separated only by a hyphen.

The Respondent has no rights or legitimate interests in respect of the disputed domain name. To the best of the Complainant's knowledge, the Respondent does not have any trademark rights to the term "flirt4free". There is also no evidence that the Respondent retains unregistered trademark rights to the term "flirt4free", or any other term used in the disputed domain name. Neither has the Respondent received any license from the Complainant to use a domain name featuring the FLIRT4FREE Trademark.

The Respondent has not used, nor prepared to use, the disputed domain name in connection with a bona fide offering of goods or services.

The disputed domain name is registered and used in bad faith. The Respondent has intentionally attempted to attract, for commercial gain, online users by creating a likelihood of confusion with the Complainant's FLIRT4FREE mark and offerings. The use of the disputed domain name, which almost entirely replicates the FLIRT4FREE mark, to host an impersonation site, gives Internet users a false impression that the site is controlled or authorized by the Complainant.

B. Respondent

The Respondent replied to the Center by email on October 8, 2026, stating that the website associated with the disputed domain name was taken offline some time ago and had remained inactive since. The Respondent confirmed having no intention of restarting the website or using the disputed domain name in a manner that could infringe upon any third-party rights, and expressed willingness to discuss an amicable resolution. The Complainant then expressed openness to settle the dispute only if the Respondent agreed to transfer the disputed domain name by signing, dating, and returning the Standard Settlement Form.

The Respondent subsequently informed the Complainant that, while willing to transfer the disputed domain name voluntarily, the Respondent requested a reasonable contribution towards documented expenses incurred in connection with the registration and maintenance of the disputed domain name.

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 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 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 3.1, section 1.7.

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.

To the contrary, the Respondent has clearly attempted to impersonate the Complainant. Panels have held that the use of a domain name for such illegitimate activity can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1.

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.

The Panel notes that the Respondent has intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's mark as the disputed domain name resolved to a website which clearly impersonated the Complainant's website. Panels have consistently held that the use of a domain name for such illegitimate activity constitutes bad faith. WIPO Overview 3.1, section 3.4.

In addition, the Respondent indicated that it did not have any intention of using the disputed domain name and being willing to transfer it with a reasonable contribution toward documented domain-related expenses. While the Panel does not consider the Respondent's request for reimbursement, in itself, to establish bad faith, the Respondent's stated lack of any intention to use the disputed domain name is consistent with the absence of any contemplated good-faith use. In the circumstances of this case, and particularly in light of the Respondent's prior use of the disputed domain name to impersonate the Complainant and offer services corresponding to those of the Complainant, these circumstances further support the Panel's finding of 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 <flirt4-free.com> be transferred to the Complainant.

/Willem J. H. Leppink/
Willem J. H. Leppink
Sole Panelist
Date: November 10, 2026