Decision for dispute CAC-UDRP-108502

Case number	CAC-UDRP-108502
Time of filing	2026-03-23 09:40:39
Domain names	tf1-lnfo.com

Case administrator

Organization	Iveta Špiclová (Czech Arbitration Court) (Case admin)

Complainant

Organization	TELEVISION FRANCAISE 1

Complainant representative

Organization	IN CONCRETO

Respondent

Name	John Greenly

OTHER LEGAL PROCEEDINGS

The Panel is not aware of any other legal proceedings which are pending or decided and which relate to the disputed domain name.

IDENTIFICATION OF RIGHTS

The Complainant is the owner, amongst others, of the following trademark registrations:

- French trademark registration No. 1290436 TF1 filed on November 22, 1984 and duly renewed in classes 1; 2; 3; 4; 5; 6; 7; 8; 9; 10; 11; 12; 13; 14; 15; 16; 17; 18; 19; 20; 21; 22; 23; 24; 25; 26; 27; 28; 29; 30; 31; 32; 33; 34; 35; 36; 37; 38; 39; 40; 41 and 42.

- International trademark registration No. 556537 TF1 (device) registered on July 30, 1990 and duly renewed in classes 9; 16; 25; 28; 35; 38 and 41.

- French trademark registration No. 99812962 TF1 Online filed on September 20, 1999 and duly renewed in classes 5; 9; 16; 25; 28; 35; 38; 40; 41; 42 and 45.

- International trademark registration No. 761279 TF1 DIGITAL registered on November 27, 2000 and duly renewed in classes 9; 16; 35; 38; 41 and 42.

- French trademark registration No. 3680851 TFI NEWS (device) filed on October 2, 2009 and duly renewed in classes 9; 16; 35; 38; 41 and 42.

- International trademark registration No. 1676495 TF1 INFO registered on April 22, 2022 in classes 9; 35; 38; 41 and 42.

FACTUAL BACKGROUND

The Complainant, founded in 1974, is part of the TF1 Group, a leading French media company, present in linear television, streaming, and audiovisual production.

The Group made 2,297 million euros in revenue in 2025 and includes more than 3.000 employees in 12 countries. The Complainant is a well-known company; since privatization in 1987, TF1 has remained the most watched television channel in France and its 8 p.m. news is the most watched daily program on French television.

Through financial, material, and human substantial investments, TF1 developed a large customers base through TF1 brands, which have achieved a reputation and notoriety in its field of activity and beyond. The public is able today to know and recognize that TF1 is a key player for checked and confirmed information. TF1 is indeed widely known and respected for its news coverage. As the French leading television channels, it has built a strong reputation for delivering reliable and comprehensive information to the public.

The Complainant has demonstrated to be the owner of different registrations which consist of or include TF1, including TF1 INFO.

The Complainant trademark registrations predate the registration of the disputed domain name <tf1-lnfo.com> which was registered on February 24, 2026.

The Complainant contends that the disputed domain name <tf1-lnfo.com> is composed of a typo of “INFO” by the replacement of the letter I by l which are visually very close and can easily mislead the Internet user. Thus, in the Complainant's view, the disputed domain name is highly similar to the trademarks in which the Complainant has rights.

Furthermore, according to the Complainant, the Respondent, who has never been authorised to use trademarks containing TF1 or to register domain names containing TF1, is not making a bona fide offering of goods or services since the disputed domain name is inactive. In addition, the Complainant notes that the Respondent is not commonly known by the disputed domain names and that he is not engaged in any legitimate noncommercial or fair use of the disputed domain name.

In addition, the Complainant observes that prior decisions have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. Furthermore, according to the Complainant, the use of the privacy shield constitutes further evidence of bad faith, as the Respondent sought to conceal their identity; this is reinforced by the fact that, as alleged by the Complainant, the personal data provided when registering the domain name is false

PARTIES CONTENTIONS

The Complainant´s contentions are summarized above.

No administratively compliant Response has been filed.

RIGHTS

The Complainant has, to the satisfaction of the Panel, shown the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy).

NO RIGHTS OR LEGITIMATE INTERESTS

The Complainant has, to the satisfaction of the Panel, shown the Respondent to have no rights or legitimate interests in respect of the disputed domain name (within the meaning of paragraph 4(a)(ii) of the Policy).

BAD FAITH

The Complainant has, to the satisfaction of the Panel, shown the disputed domain name has been registered and is being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy).

PROCEDURAL FACTORS

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The Panel is satisfied that all procedural requirements under UDRP were met and there is no other reason why it would be inappropriate to provide a decision.

PRINCIPAL REASONS FOR THE DECISION

Paragraph 4(a) of the Policy provides that to obtain the transfer of the disputed domain name; the Complainant must prove that each of the following elements is present:

(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 respect of the disputed domain name; and

(iii) the disputed domain name has been registered and is being used in bad faith.

1) The Panel considers that the disputed domain name is confusingly similar to the Complainant trademarks. In particular, the disputed domain name <tf1-lnfo.com> is identical to the Complainant's mark TF1, except for the hyphen and for the replacement of the letter "i" in the mark with the letter "l". This single one-letter difference shall not prevent a finding of confusing similarity under the first element, considering users may not perceive the difference between the Complainant's mark and the disputed domain name. This is a typical typosquatting case (see, among many others, Chiesi Farmaceutici S.p.A. v. allegra harrison, Tire Service Center Company (TSCCO), WIPO Case No. D2026-0550). As to the gTLD ".com", it is merely instrumental to the use in Internet and shall be disregarded under the first element confusing similarity test. The Complainant, therefore, succeeds on the first element of the Policy.

2) The Complainant provided prima facie evidence that the Respondent does not have rights or legitimate interests in respect of the disputed domain name as it is not commonly known under the disputed domain name and was never authorized to use it by the Complainant. The Respondent, in the absence of any substantial response, has not shown any facts or element to justify prior rights or legitimate interests in the disputed domain name. The Complainant therefore succeeds also on the second element of the Policy.

3) The Complainant trademarks TF1 and TF1 INFO are distinctive and well-known. It is uncontroverted that Complainant's worldwide use and registration of its trademarks largely precede the registration date of the disputed domain name. The fact that the Respondent has registered the disputed domain name that is almost identical to them clearly indicates that the Respondent had knowledge of the Complainant's trademarks at the time of registration of the disputed domain name. This is clear evidence of registration of the domain name in bad faith. The disputed domain name is merely directed to an error page, and therefore it is clear that the disputed domain name is not used for any bona fide offerings since it is not connected to any active website. The fact that the Respondent effectively passively holds the disputed domain name cannot prevent a finding of use in bad faith (see Telstra Corporation Limited v. Nuclear Marshmallows, WIPO Case No. D2000-0003). The Panel wishes to stress that the disputed domain name holds no Internet content and it is connected to an error page; it means that customers searching for information on the Complainant and the Complainant's service may come to the conclusion that there are problems at the Complainant's site, that the Complainant's web information and services are no longer in active use. Such 'non-use' by the Respondent can have the same negative result on the Complainant as active use of a disputed domain name and amounts to bad faith use" (FIL Limited v. George Dyle, WIPO Case No. D2014-1418). The fact, as the Complainant has rightly pointed out, that the Respondent has engaged in conduct that typically constitutes typosquatting and the use of the privacy shield, certainly constitutes further evidence of bad faith in the case at hand. The Complainant, therefore succeeds also on the third element of the Policy.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

AND THE DISPUTED DOMAIN NAME(S) IS (ARE) TO BE

1. **tf1-lnfo.com**: Transferred

PANELLISTS

Name	**Guido Maffei**

DATE OF PANEL DECISION 2026-04-20

Publish the Decision