

Decision for dispute CAC-UDRP-108845

Case number	CAC-UDRP-108845
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Time of filing	2026-07-22 09:09:07
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Domain names	tf1-sante.com
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Case administrator

Name	Olga Dvořáková (Case admin)
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Complainant

Organization	TELEVISION FRANCAISE 1
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Complainant representative

Organization	IN CONCRETO
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Respondent

Organization	Loki
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OTHER LEGAL PROCEEDINGS

The Panel is aware of a previous UDRP matter (CAC-UDRP-108712) involving the Complainant and concerning the domain name <tf1info-sante.com>. According to the Complainant, that proceeding was filed on 8 June 2026 and an amended complaint was filed on 12 June 2026. The present disputed domain name <tf1-sante.com> was registered on 13 June 2026. According to the Complainant, both domain names have been registered by the same registrant.

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 holder of numerous registered trademarks containing or consisting of TF1, including French word mark TF1 No. 1290436, filed on 22 November 1984 and covering classes 1 to 42, and International figurative mark TF1 No. 556537, registered on 30 July 1990 and covering classes 9, 16, 25, 28, 35, 38 and 41.

FACTUAL BACKGROUND

The Complainant, TELEVISION FRANCAISE 1 (TF1), is a French media company active in television broadcasting, streaming and audiovisual production. It was incorporated in 1974 and forms part of the TF1 Group.

The Complainant owns a portfolio of trademarks containing or consisting of TF1. It also operates online services, including through the domain names <tf1.fr> and <tf1info.fr>. The latter includes a section dedicated to health-related information.

The disputed domain name <tf1-sante.com> was registered on 13 June 2026 and does not resolve to an active website.

The Complainant states that, on 8 June 2026, it filed another UDRP complaint with the CAC concerning <tf1info-sante.com>, and that an amended complaint in that proceeding was notified to the registrant on 12 June 2026. The case is known under No. 108712. The Registrar's verification in the present proceeding disclosed an email address which, according to the Complainant, is identical to the email address associated with the registrant in CAC-UDRP-108712.

PARTIES CONTENTIONS

The Complainant contends that the requirements of the Policy have been met and that the disputed domain name should be transferred to it.
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

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 15 of the Rules provides that the Panel is to decide the complaint on the basis of the statements and documents submitted in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

The onus is on the Complainant to make out its case and it is apparent, both from the terms of the Policy and the decisions of past UDRP panels, that the Complainant must show that all three elements set out in Paragraph 4(a) of the Policy have been established before any order can be made to transfer a domain name. As the proceedings are administrative, the standard of proof is the balance of probabilities.

Thus, for the Complainant to succeed it must prove, within the meaning of Paragraph 4(a) of the Policy and on the balance of probabilities that:

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

The Panel has therefore dealt with each of these requirements in turn.

- 1. Identity or confusing similarity**

The Complainant must first establish that there is a trademark or service mark in which it has rights. Since the Complainant is the holder of registered TF1 trademarks, it is established that there is a trademark in which the Complainant has rights.

The disputed domain name <tf1-sante.com> incorporates the Complainant's TF1 trademark in its entirety, followed by a hyphen and the term "sante". In the Panel's view, the addition of this term does not prevent the Complainant's trademark from being recognizable within the disputed domain name (see section 1.8 WIPO Overview 3.1).

It is well established that the Top Level Domain ("TLD") ".com" may be disregarded when considering whether the disputed domain name is identical or confusingly similar to the trademark in which the Complainant has rights (see section 1.11 WIPO Overview 3.1).

Therefore, the Panel finds that the disputed domain name is confusingly similar to the Complainant's trademark. Accordingly, the Complainant has made out the first of the three elements that it must establish.

2. No rights or legitimate interests

Under paragraph 4(a)(ii) of the Policy, the Complainant has the burden of establishing that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It is established case law that it is sufficient for the Complainant to make a prima facie showing that the Respondent has no right or legitimate interest in the disputed domain name in order to shift the burden of production to the Respondent (see section 2.1 WIPO Overview 3.1).

The Panel notes that there is no evidence that the Respondent has been commonly known by the disputed domain name or has acquired trademark or service mark rights corresponding to it. The Respondent's use and registration of the disputed domain name was not authorized by the Complainant, and there are no indications of any connection between the Parties. According to the information provided by the Registrar, the Respondent is known as "Gerald Darnet / Loki".

A respondent's use of a domain name will not be considered "fair" if it falsely suggests affiliation with the trademark owner. The correlation between a domain name and the complainant's mark is often central to this inquiry. Generally speaking, UDRP panels have found that where a domain name consists of a trademark plus an additional term, such composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner (see section 2.5.1 WIPO Overview 3.1). The disputed domain name combines the Complainant's TF1 trademark with the French term "sante", meaning "health". The Complainant provides health-related news and information through its online services. In these circumstances, the Panel finds that the composition of the disputed domain name carries a risk of implied affiliation with the Complainant and does not support a claim to fair use.

The Panel further observes that the disputed domain name does not resolve to an active website. There is no evidence of use in connection with a bona fide offering of goods or services or of a legitimate noncommercial or fair use.

The Respondent had the opportunity to demonstrate rights or legitimate interests but did not do so. In the absence of a Response, the prima facie case established by the Complainant has not been rebutted.

Therefore, the Panel finds that the Complainant has established that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant succeeds on the second element of the Policy.

3. Bad faith

The Complainant must prove on the balance of probabilities that the disputed domain name was registered in bad faith and that it is being used in bad faith (see section 4.2 WIPO Overview 3.1 and *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. D2000-0003).

A respondent's awareness of the complainant and/or the complainant's trademark rights at the time of registration may support a finding of bad faith.

In the present case, the Panel finds, on the balance of probabilities, that the Respondent was aware of the Complainant and its TF1 trademark when registering the disputed domain name. The TF1 trademark substantially predates the registration of the disputed domain name, and the Complainant shows that its mark enjoys a significant reputation. The disputed domain name reproduces that mark in its entirety and combines it with the French term "sante". The evidence shows that the Complainant provides health-related information through its media services.

The timing and surrounding circumstances provide further support for this conclusion. The Complainant had filed CAC-UDRP-108712 concerning a similar domain name <tf1info-sante.com> on 8 June 2026; the amended complaint was notified to the registrant on 12 June 2026; and the present disputed domain name was registered on 13 June 2026. According to the Complainant, the Registrar verification in the present proceeding disclosed the same email address as that associated with the registrant in the earlier proceeding. The Complainant does not provide evidence supporting this, but it has not been contested. In the absence of any contrary explanation from the Respondent, these circumstances strongly indicate that the disputed domain name was registered with knowledge of the Complainant and its rights and in response to the earlier proceeding.

The fact that the disputed domain name is currently inactive does not prevent a finding of bad faith. Taking into account the circumstances described above, including the composition of the disputed domain name, the timing of its registration and the absence of any explanation or evidence of contemplated good-faith use, the Panel finds that the passive holding of the disputed domain name constitutes use in bad faith in the circumstances of this case (see section 3.3 WIPO Overview 3.1; *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. D2000-0003).

Therefore, the Panel finds that, on the balance of probabilities, the disputed domain name was registered and is being used in bad faith. The Complainant succeeds 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-sante.com**: Transferred

PANELLISTS

Name	Flip Petillion
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DATE OF PANEL DECISION 2026-08-27

Publish the Decision