

FOCUS IP

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FRENCH LCEN LAW: THE BLOCKING OF A WEBSITE ORDERED BY A COURT THROUGH DYNAMIC INJUNCTIONS



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[Paris Judicial Court, 18 December 2025, No. 25/57898](#)

IMPACT: *The President of the Paris Judicial Court, acting after a request from ARCOM, ordered internet service providers (ISPs) to block the website WatchPeopleDie.tv, which is exclusively dedicated to broadcasting violent content that is offensive to human dignity.*

On this occasion, the judge set out the criteria for addressing ISPs directly rather than the hosting providers and editors of the disputed website and specified the procedures for blocking the said website.

➤ **The facts**

Having become aware of the *WatchPeopleDie.tv* website, the French Regulatory Authority for Audiovisual and Digital Communication (**ARCOM**) referred the matter to the President of the Paris Judicial Court to seek an order requiring ISPs (Orange, Free, SFR and Bouygues Télécom) to block access to the disputed website, as part of an expedited urgent on the merits.

The sole purpose of this website is to broadcast videos showing people dying in a violent manner, which may constitute offences against personal integrity through complicity and the dissemination to minors of violent messages contrary to human dignity, in breach of Articles 222-33-3 and 227-24 of the Criminal Code.

➤ **Identification of the damage resulting from the content of the disputed website**

Firstly, the President of the Judicial Court points out that Article 6-3 of the LCEN Law authorises him to take “*any measures necessary to prevent or put an end to harm caused by the content of an online public communication service.*”

He then sets about verifying that the disputed site does indeed cause harm due to its content and notes that:

- it is “*exclusively dedicated to the dissemination of videos which its publishers describe as horrific and which no one should see*”, which breaches Article 222-33-3 of the Criminal Code prohibiting the broadcast of images relating to the commission of offences;

- it is “freely accessible to the public, subject only to a sworn declaration by the user that they are of legal age, without any verification being carried out”, which breaches Article 227-24 of the Criminal Code prohibiting the dissemination of violent messages to minors;
- it contains numerous other offences “in view of the content of the videos described above and the accompanying comments” (public glorification of a terrorist act, incitement to suicide where the incitement was followed by suicide or an attempted suicide, public insult, etc.).

The numerous videos on the site therefore constitute “a harm that must be stopped”.

➤ **The request targeting ISPs deemed “necessary and proportionate to the legitimate aim pursued”**

The judge first points out that Article 6-3 of the LCEN Law provides that it is his responsibility to determine the persons to whom a request may be addressed by ARCOM (ISPs, website publishers, hosting providers, etc.).

He then notes that ARCOM addressed its request to the ISPs, which have a duty to participate in the fight against attacks on human dignity as provided for in Article 6-4-A of the LCEN, even though ISPs are “governed by a principle of neutrality”.

In this regard, he emphasises that ISPs “are indeed in a position, insofar as they offer their subscribers access to online public communication services [...] to contribute to the cessation of the harm caused by the website”.

Finally, the judge upheld ARCOM’s decision to address the ISPs directly, which proved to be “necessary and proportionate to the legitimate aim pursued” given:

- the absence of legal notices on the disputed website, making it impossible to identify the administrator or the person responsible for publication;

- the lack of a response from the website’s editor to the French authorities’ requests for removal;
- the lack of a response from the US hosting provider CLOUDFLARE to the requests from the French judicial authorities.

The “foreseeable difficulty for the claimant to obtain, within a timeframe commensurate with the seriousness of the harm described above, a court order against the editor of this website or the company hosting it” therefore justifies approaching the ISPs.

➤ **The nature of the blocking measure as “appropriate, necessary and proportionate to the objective pursued”**

The judge then goes on to assess the proportionality of the blocking measure.

The judge notes that the site “not only contains no information, opinion or idea (...) but is, on the contrary, entirely dedicated to the dissemination of extremely violent images, which are an affront to human dignity and likely to affect and shock a young audience and have a harmful influence on them”.

The blocking order sought is therefore deemed “appropriate, necessary and proportionate to the objective pursued, namely the cessation of this particularly serious harm.”

➤ **Blocking the site at the ISPs’ expense “for as long as the harm persists”**

ISPs remain free to choose the blocking measure they deem “the most appropriate and effective”, according to the judge. However, the cost of implementing it remains their responsibility, as the economic consequences are not excessive for them, given that they are required to participate in the fight against the offences referred to above, pursuant to Article 6-4-A of the LCEN Law.

The blocking measure must be maintained “*for as long as the harm persists*”, that is to say, for as long as the site continues to disseminate the unlawful content.

It may be lifted by ISPs “*at the request of ARCOM or with its consent, in the event of the cessation of the harm, the disappearance of the website or the deactivation of the domain name*”.

The court, however, ruled out any obligation on ARCOM to inform ISPs “*without delay*” in the event that the blocking measure becomes unnecessary, despite their request.

➤ ***The use of a “dynamic” injunction to ensure the effectiveness of the blocking measure***

To prevent the content of the disputed website from being “replicated” on another website as soon as it is blocked (a practice known as “mirror sites”), the

judge invoked the provisions of Article 6-4 of the LCEN Law.

This allows ARCOM to request that hosting providers and ISPs prevent access to any website that reproduces, in whole or in part, the content of a site whose blocking has been ordered by an enforceable judgment.

This option is available for the offences specifically listed in Article 6-4-A of the LCEN Law, including the dissemination of images relating to the commission of offences and the dissemination of violent messages to minors.

The judge then states in his judgment that he designates Orange, Free, SFR and Bouygues Telecom as entities that may receive a request from ARCOM to block any “mirror sites” of the *WatchPeopleDie.tv* website.

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