

ADMINISTRATIVE PANEL DECISION

Sanofi v. PHAM VAN THAI, Domain Service
Case No. D2025-5256

1. The Parties

The Complainant is Sanofi, France, represented by Selarl Marchais & Associés, France.

The Respondent is PHAM VAN THAI, Domain Service, Viet Nam.

2. The Domain Name and Registrar

The disputed domain name <sanofimwork.com> is registered with Dominet (HK) Limited (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 16, 2025. On December 16, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 18, 2025, 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 (Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 18, 2025, 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 December 29, 2025.

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 December 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 19, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 20, 2026.

The Center appointed Christelle Vaval as the sole panelist in this matter on January 26, 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 is one of the world's leading pharmaceutical companies. It is present in more than 100 countries.

The Complainant owns the SANOFI trademark and has registered its rights in multiple jurisdictions including:

- The European Union, filing number 010167351, filed on August 2, 2011, and registered on January 7, 2012; and
- The United States of America, number 85396658, filed on August 12, 2011, and registered on July 24, 2012.

The Complainant owns multiple domain names that contain the SANOFI trademark, including <sanofi.com>, <sanofi.eu>, and <sanofi.fr>.

The disputed domain name was registered on December 10, 2025, by the Respondent. The disputed domain name website is inactive and resolves to an error page.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for a cancellation of the disputed domain name.

The Complainant contends notably that:

- The disputed domain name is identical or confusingly similar to the SANOFI trademark. The SANOFI trademark is reproduced and is the dominant aspect of the disputed domain name.
- The Respondent has no rights or legitimate interest in the SANOFI trademark. The Complainant has never authorized or licensed the Respondent to use its trademark. The Respondent is not using the disputed domain name in connection with a legitimate offering of goods or services. The disputed domain name's inactive status indicates that the Respondent has no genuine interest.
- The disputed domain name was registered and is being used in bad faith. The Respondent must have been aware of the SANOFI trademark at the time of registration due to its worldwide reputation and distinctive nature. The Respondent registered the domain name to create a likelihood of confusion or an impression of association with the Complainant.

B. Respondent

The Respondent did not reply to the Complainant's contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Panel must find the three conditions satisfied to cancel the disputed domain name:

- (i) The disputed domain name is identical or confusingly similar to the Complainant's trademark; and
- (ii) Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) The disputed domain name was 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. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), 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 Complainant's trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms here, "my" and "work", may bear on assessment of the second and third elements, the Panel finds the addition of such terms does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), 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 a 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 3.0](#), 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.

The Panel finds that the Respondent did not show any right or legitimate interest in the disputed domain name for the following reasons:

- The Respondent has not provided any evidence to suggest that the disputed domain name was registered for a legitimate business purpose or that it has been used in connection with a genuine offering of goods or services.
- Based on the records, the Respondent does not appear to be commonly known by the disputed domain name. Furthermore, the Respondent's name is unrelated to the SANOFI trademark, which is widely regarded as both distinctive and internationally recognized. The Complainant has neither granted a license nor otherwise authorized the Respondent to use its trademark or to register any domain name containing the SANOFI trademark.
- The Respondent has not demonstrated any legitimate noncommercial or fair use of the disputed domain name. The lack of use, combined with the absence of any Response, further supports the conclusion that the Respondent has no legitimate interest in the domain name.

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 following circumstances show that the disputed domain name was registered and is being used in bad faith:

- Given that the Complainant's trademark is widely known and distinctive, the Respondent's registration of the disputed domain name containing SANOFI with the terms "my" and "work" appears intended to leverage the Complainant's reputation and mislead Internet users.
- The Respondent's passive holding of the domain name, as evidenced by the inactive website, supports the finding of bad faith.
- The Respondent's use of a privacy protection service to hide its identity.
- The contact details provided appear to be false or incomplete, as the Center was unable to deliver the written notice to the address given by the Respondent.

Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case, the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

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 <sanofimywork.com> be cancelled.

/Christelle Vaval/

Christelle Vaval

Sole Panelist

Date: February 3, 2026