

ADMINISTRATIVE PANEL DECISION

Sanofi v. Bryan Garrison
Case No. D2025-5287

1. The Parties

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

The Respondent is Bryan Garrison, United States of America (“United States”)

2. The Domain Name and Registrar

The disputed domain name <sanofiaventisus.com> is registered with Wild West Domains, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 18, 2025. On December 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 19, 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 (“Registration Private”) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 22, 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 January 7, 2026.

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 January 8, 2026. In accordance with the Rules, paragraph 5, the due date for Response was January 28, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on February 4, 2026.

The Center appointed Peter Burgstaller as the sole panelist in this matter on February 13, 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 worldwide leading multinational pharmaceutical companies headquartered in Paris. In 2004, the Complainant was formed from a merger between Aventis and Sanofi-Synthélabo to “Sanofi-Aventis” and changed its name to “Sanofi” in May 2011 (Annex 5 - 7 to the Complaint).

The Complainant put forward evidence that it has numerous trademark registrations consisting of the word SANOFI around the world, inter alia:

- French Trademark SANOFI (word), Registration No. 1482708, registered August 11, 1988 (Annex 8.4 to the Complaint);
- European Union Trademark SANOFI (word), Registration No. 010167351, registered January 7, 2012 (Annex 8.5. to the Complaint);
- European Union Trademark SANOFI (word), Registration No. 004182325, registered February 9, 2006 (Annex 8.6 to the Complaint); and
- International Trademark SANOFI (word), Registration No. 1092811, registered on August 11, 2011, designating among others Australia, Cuba, Georgia, Iceland, Japan, Republic of Korea, Russian Federation, and Ukraine (Annex 8.9 to the Complaint).

The Complainant has also put forward evidence that it is the owner of several domain name registrations containing the mark SANOFI, e.g. <sanofi.com>, <sanofi.eu>, <sanofi.us> <sanofi.fr>, <sanofi.net>, <sanofi.biz>, <sanofi.info> or <sanofi.ca>, all of them were registered long before the registration of the disputed domain name (Annex 9 to the Complaint); the Complainant uses the domain name <sanofi.com> to host its primary website (Annex 6 to the Complaint).

The disputed domain name was registered on December 15, 2025 (Annex 1 to the Complaint). At the time of filing the Complaint, the disputed domain name did not resolve to a website with material content (Annex 11 to the Complaint).

5. Parties' Contentions

A. Complainant

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

Notably, the Complainant contends that it is the rightful owner of the trademark SANOFI-AVENTIS, a highly distinctive, well known and famous mark around the world; it notes that the disputed domain name contains this SANOFI-AVENTIS trademark in its entirety and simply adding the letter “us” and omitting the hyphen between SANOFI and AVENTIS which cannot eliminate the confusing similarity between the Complainant’s trademark and the disputed domain name.

Moreover, the Complainant’s trademark registrations as well as domain name registrations which contain the SANOFI-AVENTIS mark are prior to the registration of the disputed domain name.

The Complainant submits that especially because of the fame of the Complainant and its trademark it is inconceivable that the Respondent would not have been aware of the Complainant’s trademark when registering the disputed domain name, or that there would be any legitimate use for the disputed domain

name. Further, the Complainant has never assigned, granted, licensed, sold, transferred or in any way authorized the Respondent to use the SANOFI-AVENITS or SANOFI trademark in any manner.

Finally, the Complainant notes that the disputed domain name does not resolve to an active website and is therefore not used for a bona fide offering of goods or services. Moreover, the passive holding of a domain name may amount to bad faith.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, the Complainant must prove that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests with respect to the disputed domain name; and
- (iii) the disputed domain name has been 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 ("[WIPO Overview 3.1](#)"), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of the mark SANOFI for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

While the Complainant does appear to have rights in the mark SANOFI-AVENTIS, the Panel wants to note at this point, that the Complainant has provided documented evidence of its rights in the mark SANOFI rather than SANOFI-AVENTIS, and evidence of its registration of domain names containing the term "sanofi" rather than "sanofi-aventis" (Annex 8.1 – 8.14 and 9.1 – 9.11 to the Complaint).

Nevertheless, it is the Panel's opinion that the disputed domain name is confusingly similar to the mark SANOFI in which the Complainant has rights since it incorporates the entirety of the mark and only adds the term "aventisus" to the SANOFI mark.

It has long been established under UDRP decisions that where the relevant trademark is recognizable within the disputed domain name, the mere addition of other terms does not prevent a finding of confusing similarity under the first element of the Policy. This is the case at present, since the distinctive and dominant feature of the mark is SANOFI which is clearly recognizable in the disputed domain name. [WIPO Overview 3.1](#), section 1.7.

Finally, it has also long been held that generic Top-Level Domains ("gTLDs") (in this case ".com") are generally disregarded when evaluating the confusing similarity of a disputed domain name. [WIPO Overview 3.1](#), section 1.11.1.

Based on the available record, 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 3.1](#), section 2.1.

Having reviewed the 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 Complainant focuses on the fact that its trademark is highly distinctive and famous and provides suitable evidence of its reputation, adding that it is inconceivable that the Respondent would not have been aware of this when registering the disputed domain name. The Complainant also notes that the disputed domain name is not being used for a bona fide offering of goods or services.

The nature of the disputed domain name, comprising the Complainant’s distinctive and famous mark together with the suffix “aventisus” cannot be considered fair use as these, in the Panel’s view, signal the Respondent’s intention to confuse users seeking or expecting the Complainant and its company.

The Respondent did not reply to the Complainant’s contentions and hence has not rebutted the Complainant’s prima facie showing.

Based on the available record, the Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

As stated in paragraph 4(a)(iii) of the Policy, the Complainant must show registration and use of the disputed domain name in bad faith. These are concurrent requirements.

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 Complainant has rights and is the owner of the distinctive and globally well-known mark SANOFI, which is registered and used in many jurisdictions around the world long before the registration of the disputed domain name. Moreover, the Complainant registered and is using numerous domain names containing the mark SANOFI, especially <sanofi.com> to host its company website.

It is inconceivable for this Panel that the Respondent registered the disputed domain name without knowledge of the Complainant’s rights, which leads to the necessary inference of bad faith. This finding is supported by the fact that the disputed domain name incorporates the Complainant’s distinctive trademark SANOFI in its entirety together with the suffix “aventisus” which even strengthens the impression that the Respondent must have been aware of the Complainant, its mark and company when registering the disputed domain name since “Sanofi-Aventis” was the company name of the Complainant until 2011.

Finally, a simple online search for “sanofi” would have shown the Complainant and its marks. [WIPO Overview 3.1](#), section 3.2.3.

Therefore, the Panel is convinced that the disputed domain name was registered in bad faith by the Respondent.

Although there is no evidence that the disputed domain name is being actively used or resolved to a website with substantive content, UDRP panels have found that the non-use of a domain name (including a blank or “coming soon” or “parking” page) would not prevent a finding of bad faith under the doctrine of passive holding.

Having reviewed the available record, the Panel finds the non-use of the disputed domain name does not prevent a finding of bad faith in the circumstances of these proceedings. Although panelists will look at the totality of the circumstances in each case, factors that have been considered relevant in applying the passive holding doctrine include: (i) the degree of distinctiveness or reputation of the complainant’s mark, and (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use. [WIPO Overview 3.1](#), section 3.3.

On the basis of the evidence and documents put forward in the Complaint the Complainant has a strong online presence worldwide, its trademark SANOFI is distinctive, famous and globally well known and the Respondent did not submit a Response; these factors support the finding 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.

Based on the available record, the Panel finds that the third element of the Policy has been established.

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 <sanofiaventisus.com> be cancelled.

/Peter Burgstaller/

Peter Burgstaller

Sole Panelist

Date: February 27, 2026