

ADMINISTRATIVE PANEL DECISION

Sanofi v. Hamed Amrani
Case No. D2025-0889

1. The Parties

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

The Respondent is Hamed Amrani, France.

2. The Domain Name and Registrar

The disputed domain name <sanofie.com> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 4, 2025. On March 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 5, 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, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 6, 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 amended Complaint on March 13, 2025.

The Center verified that the Complaint together with the amended 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 March 14, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 3, 2025. The Respondent sent email communications to the Center on March 11, 12, 13, 14, and April 6, 2025.

The Center appointed Elise Dufour as the sole panelist in this matter on April 10, 2025. 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

With consolidated net sales of EUR 43 billion in 2022, SANOFI is a French multinational pharmaceutical company headquartered in Paris, France, ranking 4th world's largest multinational pharmaceutical company by prescription sales, operating in over 100 countries, across all five continents, employing 100,000 people.

SANOFI engages in research and development, manufacturing and marketing of pharmaceutical products for sale, principally in the prescription market, but the firm also develops over-the-counter medication.

The Complainant owns numerous trademarks, including the following ones:

- French trademark SANOFI, registered on No. 1482708 on August 11, 1988;
- French trademark SANOFI, registered under No. 96655339 on January 17, 1997;
- European Union trademark SANOFI, registered under No. 000596023 on February 1, 1999;
- European Union trademark SANOFI, registered under No. 004182325 on February 9, 2006.

In addition, the Complainant owns various domain names that contain the trademark SANOFI and notably the domain names:

- <sanofi.com> registered on October 13, 1995;
- <sanofi.eu> registered on March 12, 2006 (Annex 9.2 to the Complaint);
- <sanofi.fr> registered on October 10, 2006.

The disputed domain name was registered on March 2, 2025.

At the time of filing of the Complaint, it was used to resolve to a Registrar's parking page with the message "Ce domaine est enregistré, mais il est peut-être encore disponible" meaning in English : "This domain is registered, but may still be available".

5. Parties' Contentions

A. Complainant

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

The Complainant claims that the disputed domain name is (i) identical or confusingly similar to its earlier trademarks, (ii) that the Respondent has no rights or legitimate interests in the disputed domain name, and (iii) that the disputed domain name has been registered and is being used in bad faith.

(i) The Complainant asserts that the disputed domain name is confusingly similar to its well-known trademarks, arguing that the disputed domain name wholly incorporates the SANOFI mark. According to the Complainant, the mere addition of the letter "e" at the end of SANOFI is insufficient to eliminate the phonetic and visual similarity between the disputed domain name and the Complainant's trademarks. The Complainant further emphasizes that its SANOFI trademarks have been recognized as well-known in multiple jurisdictions and in several prior UDRP decisions.

(ii) The Complainant states that the Respondent has no rights or legitimate interests in respect of the disputed domain name and the Complainant has not licensed or otherwise permitted the Respondent to use

its trademark SANOFI. The Complainant stresses the fact that the word “sanofi” has no particular meaning and is therefore highly distinctive. In addition, the Complainant stresses that the Respondent used the “Registration Private Domains By Proxy, LLC” in order to keep his true identity secret. Furthermore, the Complainant contends that the disputed domain name is not used in connection with a bona fide offering of goods or services, as the disputed domain is used as a bait and switch. The Complainant has further argued that the Respondent seeks to derive commercial benefit by exploiting the reputation and goodwill associated with the Complainant’s SANOFI mark.

(iii) Due to the strong reputation and well-known character of the Complainant and its trademarks, the Complainant considers that the Respondent must have had the SANOFI trademarks in mind when registering the disputed domain name. For the Complainant, the Respondent has neither prior right nor legitimate interest to justify the use of the already well-known and worldwide trademarks and domain names of the Complainant. For the Complainant, the disputed domain name has been registered for the purpose of attracting Internet users to the Respondent’s website by creating a likelihood of confusion – or at least an impression of association – between SANOFI trademarks and the disputed domain name. The Complainant also claims that the Respondent’s use of the disputed domain name is made in bad faith, as it leads to a parking website and has been registered only for the purpose unfairly attracting the Complainant’s consumers, as it is clearly revealed on the Respondent’s webpage. Finally, the lack of genuine use of the disputed domain name particularly close to those used by the Complainant is likely to cause irreparable prejudice to their general goodwill.

The Complainant requests the transfer of the disputed domain name.

B. Respondent

The Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name. The Respondent has provided multiple written communications to the Center on March 11, 12, 13, 14, and April 6, 2025, in response to the Complaint filed by the Complainant.

Across these communications, the Respondent consistently emphasizes acting in good faith, the absence of any intent to create confusion, and proposes an amicable resolution under fair terms.

Regarding the legitimate acquisition and use of the disputed domain name, the Respondent asserts that it was acquired legitimately, with no intention to infringe on the Complainant’s rights and pretends that the disputed domain name was registered for a mirror sales project, unrelated to the pharmaceutical industry. per the Respondents’ email communications dated March 11, 12, 13, 14, and 15, 2025.

The Respondent further contends that he never activated a website nor used the disputed domain name for misleading or commercial gain. The Respondent denies any bad faith registration or use, emphasizing no link between the disputed domain name and the Complainant’s core business and no exploitation of the Complainant’s trademark recognition.

The Respondent, however, acknowledges a material error (a typo) when listing the disputed domain name for sale and states that upon realizing the potential issue, the Respondent promptly withdrew the disputed domain name from sale, demonstrating reactive good faith and the absence of malicious intent.

The Respondent further argues that the Complainant failed to protect variant domain names proactively, thus neglecting its own trademark defense strategy.

Finally, the Respondent offered to transfer the disputed domain name to the Complainant in exchange for USD 5,000, arguing that this is a reasonable settlement.

6. Discussion and Findings

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 Panel finds the mark is recognizable within the disputed domain name. The disputed domain name reproduces the Complainant's trademark in its entirety with the addition of a single letter "e" which does not prevent a finding of confusing similarity under the Policy. This amounts to "typosquatting". [WIPO Overview 3.0](#), section 1.9. Accordingly, the Disputed Domain Name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. 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. Based upon the Complainant's uncontested submissions that the Respondent is not affiliated to the Complainant, that the Complainant has neither licensed nor authorized the Respondent to use its SANOFI trademark, nor to register or use the disputed domain name incorporating such mark, that the Complainant has not endorsed or sponsored the Respondent or the Respondent's activities, and that there is no evidence that the Respondent is commonly known by the disputed domain name or owns any corresponding registered trademarks.

The Panel therefore turns to the Respondent's case in rebuttal. The Panel notes that the Respondent asserts that it has rights and legitimate interests in the disputed domain name and that he registered it for an allegedly legitimate (for a mirror sales project) business purpose and did so independently and without targeting the Complainant's rights in its SANOFI trademark, by adding a letter "e" to the well-known trademark.

The Respondent neither substantiated nor provided evidence of its alleged intended use of the disputed domain name for a mirror sales project.

In this regard, the Respondent merely asserted — without providing any supporting evidence — that the listing of the disputed domain name for sale was the result of an error.

Paragraph 4(c)(i) of the Policy requires the respondent, if it relies upon it, to demonstrate rights and legitimate interests by showing either its use of, or demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods and services before notice of the dispute. The phrase “demonstrable preparations” here means that a respondent that is not able to show any current use of the disputed domain name must nevertheless demonstrate what preparations it has undertaken for such use, which will inevitably require some disclosure to the panel of its plans. If the respondent does not provide such evidence, it cannot expect the panel to accept a mere assurance or a conclusory allegation that its planned use of the disputed domain name could only be in connection with a bona fide offering of goods and services.

In addition, the Respondent offered to settle the dispute by asking USD 5,000 to the Complainant. The Panel finds that such use of the disputed domain name does not amount to a bona fide offering of goods or services or a legitimate noncommercial or fair use without intent for commercial gain to misleadingly divert consumers or to tarnish the Complainant’s trademark, and undermines the claim to wish to use it for a future business.

Furthermore, given that the disputed domain name is nearly identical to the Complainant’s well-known SANOFI trademark and corresponding domain name, it is inherently misleading. UDRP panels have consistently held that domain names identical or confusingly similar to a complainant’s trademark carry a high risk of implied affiliation. This principle is well established in the [WIPO Overview 3.0](#), section 2.5.1.

Finally, the Respondent has misinterpreted Article 2 of the Policy, which imposes obligations on the domain name registrant, not on the trademark owner. Article 2 provides that: “By applying to register a domain name, or by asking us to maintain or renew a domain name registration, you hereby represent and warrant to us that (a) the statements that you made in your Registration Agreement are complete and accurate; (b) to your knowledge, the registration of the domain name will not infringe upon or otherwise violate the rights of any third party; (c) you are not registering the domain name for an unlawful purpose; and (d) you will not knowingly use the domain name in violation of any applicable laws or regulations. It is your responsibility to determine whether your domain name registration infringes or violates someone else’s rights.”

Therefore, the Panel finds the second element of the Policy has also 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 Respondent has registered an almost exact match for the Complainant’s SANOFI registered trademark. Based upon the Parties’ correspondence, in which the Respondent refers to the Complainant’s renown, there can be no doubt that the Respondent registered the disputed domain name in the knowledge and awareness of the Complainant’s rights. Such renown is, in any event, established independently on the record before the Panel, including in particular on the basis of the Complainant’s ranking 4th world’s largest multinational pharmaceutical company by prescription sales.

The question then arises as to whether the Respondent had the intent to target the Complainant’s rights, and what the Respondent’s true intent was in registering and using the disputed domain name. As noted in the analysis in the preceding section, neither in the Response nor in the Parties’ correspondence does the Respondent indicate any clear purpose that might be regarded as being in good faith. Although in one email, the Respondent suggests that it might consider using the disputed domain name for a mirror sales project, without, however, providing any supporting evidence of such alleged intended use; this is expressed only as forming part of the Respondent’s considerations rather than being its original purpose when registering the disputed domain name. On the contrary, the only use of the disputed domain name demonstrated tends to demonstrate bad faith, as the disputed domain name initially directed to a parking page indicating : “Ce

domaine est enregistré, mais il est peut-être encore disponible” meaning in English : “This domain is registered, but may still be available”.

In addition, the Respondent offered to settle this matter by selling the disputed domain name for USD 5,000 to the Complainant. This reinforces the fact, despite the Respondent’s denial, that its primary purpose in registering the disputed domain name was to sell it at an uplifted value to the Complainant.

In any case, the Panel has reached the conclusion that given the composition of the disputed domain name and the renown of the Complainant, there is no immediately obvious conceivable good faith use to which the disputed domain name could have been put, and that the Respondent was likely to have known of the Complainant’s rights when it registered the disputed domain name and thus, targeted the Complainant.

Consequently, and in all of the above circumstances, the Panel finds that the disputed domain name was registered and has been used in bad faith.

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 <sanofie.com> be transferred to the Complainant.

/Elise Dufour/

Elise Dufour

Sole Panelist

Date: April 27, 2025