

ADMINISTRATIVE PANEL DECISION

Sanofi v. Brandon Seppelt
Case No. D2025-1535

1. The Parties

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

The Respondent is Brandon Seppelt, United States of America (“U.S.”).

2. The Domain Name and Registrar

The disputed domain name <sanofi-us.com> is registered with Hosting Concepts B.V. d/b/a Registrar.eu. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 15, 2025. On April 16, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 16, 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 April 28, 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 May 5, 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 May 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was May 26, 2025. The Respondent did not submit any response. On May 15, 2025, a third party email communication was received by the Center. On May 27, 2025, the Center informed the Parties of the commencement of panel appointment.

The Center appointed Beatrice Onica Jarka as the sole panelist in this matter on June 4, 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

The Complainant in these proceedings is Sanofi ranking 4th world's largest multinational pharmaceutical company by prescription sales. The Complainant engages in research and development (R&D), manufacturing and marketing of pharmaceutical products for sale, principally in the prescription market, but the Complainant also develops over-the-counter medication. With an R&D investment of EUR 6.7 billion in 2022, the Complainant's R&D portfolio includes 84 projects in clinical development, 26 of which are at advanced stages. The Complainant appears to be worldwide recognized.

The Complainant is the owner of the following SANOFI trademarks, among others:

- French trademark SANOFI number 96655339, registered on January 17, 1997 in classes 1, 3, 5, 9, 10, 35, 40, and 42;
- European Union trademark SANOFI number 010167351, filed on August 2, 2011 and registered on January 7, 2012 in classes 3 and 5; and
- International trademark SANOFI number 1091805, registered on August 18, 2011, in classes 1, 3, 5, 9, 10, 16, 35, 38, 40, 41, 42, and 44 designating among others Georgia, Russian Federation, Ukraine.

The Complainant is also the owner of the following domain names among others:

- <sanofi.com> registered on October 13, 1995;
- <sanofi.eu> registered on March 12, 2006; and
- <sanofi.fr> registered on October 10, 2006;

The Respondent in these proceedings is reportedly located in the U.S.

The disputed domain name was registered on March 30, 2025, and redirects to the Complainant's official U.S. website.

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.

Notably, the Complainant contends that:

- the disputed domain name comprises of an exact reproduction of the Complainant's trademark SANOFI, which is a highly distinctive trademark combined with a geographic acronym – "US" – followed by a Top-Level Domain suffix.
- the Respondent has no prior rights and/or legitimate interests to justify the use of SANOFI trademarks in the disputed domain name and no relationship whatsoever exists between the Complainant and the Respondent.
- the disputed domain name redirects to the Complainant's official website without authorization and is therefore being used as a phishing domain name to send emails using the SANOFI trademarks in the email address, namely "@sanofi-us.com".

- the Respondent registered the disputed domain name in bad faith corresponding to the trademarks and domain names owned by the Complainant, as this behavior can in no way be the result of a mere coincidence, given the famous and distinctive nature of the SANOFI trademark.
- the Respondent has registered and used the disputed domain name only for the purpose of unfairly attracting Internet users to the Respondent's website which further redirects to the Complainant's official U.S. website, being used as a phishing domain name to send emails using the SANOFI trademarks in the email address, namely "@sanofi-us.com".
- the lack of apparent genuine use of the disputed domain name particularly close to those used by the Complainant is likely to cause irreparable prejudice to the Complainant's general goodwill because Internet users could be led to believe that the Complainant is not on the Internet or worse that the Complainant is out of business.

B. Respondent

Although being properly notified of the Complaint, the Respondent did not reply to the Complainant's contentions.

On May 15, 2025, a third party contacted the Center indicating that they received the Written Notice addressed to the Respondent, however, there is no one by that name at their organization.

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 the SANOFI trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel considers, as other panels, that SANOFI is a highly distinctive trademark. The Panel further notes that the entirety of the SANOFI mark is reproduced within the disputed domain name. It is the disputed domain name which comprises of an exact reproduction of the Complainant's worldwide recognized trademark SANOFI combined with a geographic acronym – "US" - followed by a Top-Level Domain suffix.

The element (here, "US") added to the SANOFI trademark 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.

Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy ([WIPO Overview 3.0](#), section 1.7), and 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. Although being properly notified of the Complaint, 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 notes that the composition of the disputed domain name is inherently misleading, together with the use of the disputed domain name redirecting to the Complainant's official website, which creates a risk that Internet users may think that the disputed domain name belongs to the Complainant.

Accordingly, 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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

In the present case, the Panel notes that the Respondent:

- the Respondent registered the disputed domain name in bad faith corresponding to the trademarks and domain names owned by the Complainant, while targeting the Complainant, given the famous and distinctive nature of the SANOFI trademark.
- the Respondent has registered and used the disputed domain name only for the purpose of unfairly attracting Internet users to the Respondent's website which further redirects to the Complainant's official U.S. website. Panels have found that a respondent redirecting a domain name to the complainant's website can establish bad faith insofar as the respondent retains control over the redirection thus creating a real or implied ongoing threat to the complainant. [WIPO Overview 3.0](#), section 3.1.4.

Moreover, the bad faith behavior of the Respondent is further documented by the indication of the email from a third party to the Center dated May 15, 2025, regarding the apparent use of this third party's physical address when registering the disputed domain name.

Accordingly, 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 <sanofi-us.com> be transferred to the Complainant.

/Dr. Beatrice Onica Jarka/

Dr. Beatrice Onica Jarka

Sole Panelist

Date: June 18, 2025