

ADMINISTRATIVE PANEL DECISION

Sanofi v. Muhammad Waqas Baig
Case No. D2025-1575

1. The Parties

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

The Respondent is Muhammad Waqas Baig, Pakistan.

2. The Domain Name and Registrar

The disputed domain name <sanofi-empowering-life.com> is registered with Dynadot Inc (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 17, 2025. On April 22, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 23, 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, Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 27, 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 6, 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 sent email communications to the Center on May 6, 2025. The Center sent the possible settlement email to the Parties on the same day. The proceeding was suspended on May 6, 2025, following the Complainant’s suspension request. On June 10, 2025, the proceeding was reinstated as per the Complainant’s request, with a new Response due date of June 30, 2025. The Center informed the Parties that it would proceed to panel appointment on July 9, 2025.

On July 17, 2025, the Respondent sent email communications to the Center.

The Center appointed Kathryn Lee as the sole panelist in this matter on July 17, 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 is a French multinational pharmaceutical company with offices in more than 100 countries and 100,000 employees worldwide. The Complainant was formed as Sanofi-Aventis in 2004 by the merger of companies Aventis and Sanofi-Synthelabo, and changed its name to Sanofi in May 2011. The Complainant is engaged in research and development, manufacturing, and marketing of pharmaceutical products for sale. The Complainant had consolidated net sales of EUR 43 billion in 2022 and EUR 37.7 billion in 2021. The Complainant owns a number of trademark registrations for the SANOFI mark including French Trademark Registration Number 96655339 registered on December 11, 1996; European Union Trademark Registration Number 010167351 registered on January 7, 2012; and International Trademark Registration Number 1092811 registered on August 11, 2011. The Complainant also owns a number of trademark registrations for the mark SANOFI EMPOWERING LIFE including European Union Trademark Registration Number 016123581 registered on May 4, 2017; and International Trademark Registration Number 1349899 registered on January 27, 2017.

The Respondent appears to be an individual with an address in Pakistan.

The disputed domain name was registered on April 2, 2025 and as of the date of the filing of the Complaint, resolved to a website displaying pay-per-click (PPC) links to a chiropractor's business, a car service business, and a website showing pornographic content.

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.

Notably, the Complainant contends that the disputed domain name is confusingly similar to the SANOFI and SANOFI EMPOWERING LIFE marks in which it has registrations.

The Complainant also contends that the Respondent has no rights or legitimate interests in the disputed domain name and confirms that it has not authorized or licensed rights to the Respondent in any respect. The Complainant further contends that there is no evidence of the Respondent's use of, or demonstrable preparations to use the disputed domain name in providing any bona fide offering of goods or services, nor any evidence that the Respondent has been commonly known by the disputed domain name, or a legitimate noncommercial or fair use of the disputed domain name by the Respondent. The Complainant also contends that the disputed domain name is being used as a parking page with PPC links which is used to obtain commercial gain by misleadingly diverting consumers. One link directs to a website with pornographic content which the Complainant contends is disparaging the Complainant's reputation.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith. With respect to registration, the Complainant contends that the Respondent had opportunistic bad faith in registering the disputed domain name given the strong reputation of the SANOFI and SANOFI family of marks. With respect to use, the Complainant contends that the Respondent is using the disputed domain name to obtain indirect commercial gain by misleading the consumers and leading them to alternative websites which disparage the Complainant's reputation.

B. Respondent

The Respondent contends that the Complainant has not satisfied the bad faith element required under the Policy for a cancellation of the disputed domain name. The Respondent contends that he purchased the disputed domain name for the purpose of building generic backlinks and that he did not have any intention of using the disputed domain name to profit from the Complainant's reputation or mislead Internet users.

In response to the Complaint, the Respondent offered to cancel or transfer the disputed domain name to the Complainant in exchange for USD 10 in out of pocket costs in connection with the registration of the disputed domain name.

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 entirety of the mark SANOFI EMPOWERING LIFE is reproduced within the disputed domain name, with only the addition of hyphens and the generic Top-Level Domain ".com". Accordingly, the disputed domain name is confusing 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. 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.

Moreover, UDRP panels have found that domain names identical to a complainant's trademark carry a high risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1. Here, the disputed domain name is composed entirely of the Complainant's trademark SANOFI EMPOWERING LIFE and therefore is likely to mislead

Internet users into believing that the website at the disputed domain name is related to and/or operated by the Complainant, contrary to the fact.

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.

First, panels have found that the mere registration of a domain name that is confusingly similar to a widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4. Here, the disputed domain name is confusingly similar to the Complainant's trademark SANOFI EMPOWERING LIFE which is a widely used slogan of the Complainant, and the SANOFI mark is world-famous as the name and mark of the Complainant.

Next, considering the fame of the Complainant's mark, the Panel finds that the Respondent no doubt knew of the Complainant and the Complainant's mark when registering the disputed domain name. The Respondent does not refute that he knew of the Complainant and its mark when registering the disputed domain name.

The Respondent linked the disputed domain name to a parking page displaying PPC links to other businesses which means that the Respondent created a likelihood of confusion and likely benefited commercially from the confusion of Internet users that visited the site by mistake as per paragraph 4(b)(iv) of the Policy. Further, one of the links directed to a website showing pornographic content which is not likely to only mislead Internet users but also tarnish the reputation of the Complainant and the Complainant's mark.

The record shows that in connection with a possible settlement, the Respondent appeared willing to cancel or transfer the disputed domain name to the Complainant at little cost. However, this does not absolve the Respondent of its bad faith registration and use of the disputed domain name as detailed above.

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-empowering-life.com> be cancelled.

/Kathryn Lee/

Kathryn Lee

Sole Panelist

Date: July 31, 2025