

ADMINISTRATIVE PANEL DECISION

Sanofi v. Oscar Zhou, Oscar Information Technology Consulting Service Studio

Case No. D2025-2848

1. The Parties

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

The Respondent is Oscar Zhou, Oscar Information Technology Consulting Service Studio, China.

2. The Domain Name and Registrar

The disputed domain name <sanofi-bj.com> is registered with NameSilo, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 18, 2025. On July 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 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 (Domain Administrator, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 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 July 30, 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 July 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 19, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 21, 2025.

The Center appointed Anton Polikarpov as the sole panelist in this matter on August 28, 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 science-driven biopharmaceutical group with global operations. Established in 1973, and operating under the name “Sanofi” since 2011 (following the merger of Sanofi-Synthelabo and Aventis), the Complainant focuses on the research, development, manufacturing, and distribution of pharmaceutical products, vaccines, and consumer healthcare solutions.

The SANOFI brand has been in continuous global use for over 40 years. The Complainant owns hundreds of trademark registrations for SANOFI and related marks in virtually all jurisdictions, notably:

- French trademark No. 1482708 for SANOFI, registered on August 11, 1988, covering goods in Classes: 1, 3, 4, 5, 10, 16, 25, 28, 31;
- International trademark No. 591490 for device mark ,  registered on September 25, 1992, covering goods in Class 5;
- International trademark No. 674936 for SANOFI, registered on June 11, 1997, covering goods in Classes: 3, 5;
- International trademark No. 1094854 for SANOFI, registered on August 11, 2011, covering goods in Classes: 3, 5;
- International trademark No. 1092811 for SANOFI, registered on August 11, 2011, covering goods and services in Classes: 1, 9, 10, 16, 38, 41, 42 and 44;
- International trademark No. 1091805 for device mark,  registered on August 18, 2011, covering goods and services in Classes: 1, 3, 5, 9, 10, 16, 35, 38, 40, 41, 42 and 44.

Numerous WIPO decisions have also recognized SANOFI as a well-known and highly distinctive trademark (see, e.g., *Sanofi v. Domain Admin, Whoisprotection.cc / Jose Flora, Waeco mart ltd*, WIPO Case No. [D2021-1857](#); *Sanofi v. HUANG GUANGJIN aka HUANGGUANGJIN*, WIPO Case No. [D2020-0814](#); *Sanofi v. Svetlana Guseva*, WIPO Case No. [D2019-2815](#)).

Additionally, the Complainant owns and operates a number of domain names incorporating the SANOFI mark under various country-code and generic Top-Level Domains (“ccTLD” and “gTLD”), including the following:

- <sanofi.com> registered on October 13, 1995;
- <sanofi.eu> registered on March 12, 2006;
- <sanofi.fr> registered on October 10, 2006;
- <sanofi.us> registered on May 16, 2002;
- <sanofi.net> registered on May 16, 2003;
- <sanofi.ca> registered on January 05, 2004;
- <sanofi.biz> registered on November 19, 2001;
- <sanofi.info> registered on August 24, 2001;
- <sanofi.org> registered on July 12, 2001;
- <sanofi.mobi> registered on June 20, 2006;
- <sanofi.tel> registered on March 17, 2011.

The disputed domain name was created on June 13, 2025 and currently resolves to inactive website, and is not in use.

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.

First, the disputed domain name is confusingly similar to the SANOFI trademarks in which the Complainant has rights.

Second, the Complainant has not authorized the Respondent to use its mark, and there is no evidence of any legitimate use of the disputed domain name by the Respondent. Accordingly, the Respondent has no rights or legitimate interests in respect of the disputed domain name.

Third, the disputed domain name has been both registered and used intentionally in bad faith without any rights or legitimate interest by the Respondent.

B. Respondent

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

6. Discussion and Findings

Paragraph 4(a) of the Policy sets that the Complainant must prove each of the following three elements to obtain an order for the transfer of the disputed domain name:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and (iii) the disputed domain name has been registered and is being used in bad faith.

The Respondent is expected to address the allegations in the Complaint and to provide any arguments supporting its right to retain the disputed domain name.

It is well established that the burden of proof rests with the Complainant, even where the Respondent does not file a response (see *Stanworth Development Limited v. E Net Marketing Ltd.*, WIPO Case No. [D2007-1228](#)).

Pursuant to paragraph 5(f) of the Rules, "if a Respondent does not submit a response, in the absence of exceptional circumstances, the Panel shall decide the dispute based upon the complaint". Furthermore, paragraph 14(b) of the Rules provides that "if a Party, in the absence of exceptional circumstances, does not comply with any provision of, or requirement under, these Rules or any request from the Panel, the Panel shall draw such inferences therefrom as it considers appropriate".

Accordingly, the Panel rules as follows.

A. Identical or Confusingly Similar

The Complainant has demonstrated rights in the SANOFI mark through numerous national, regional, and international registrations for the purposes of the Policy (see the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 1.2.1).

The disputed domain name incorporates the Complainant's SANOFI trademark in its entirety and adds the geographic acronym "bj," commonly understood as referring to "Beijing" or "Benin".

It is well established that the addition of other terms, descriptive elements, or the lack thereof does not prevent a finding of confusing similarity under the first element. The nature of such additional term(s) may however bear on assessment of the second and third elements (see [WIPO Overview 3.0](#), section 1.8).

Likewise, the inclusion of a generic Top-Level Domain (".com") is a standard registration requirement and is generally disregarded when comparing a domain name with a trademark (see [WIPO Overview 3.0](#), section 1.11.1).

The Panel therefore finds the disputed domain name to be confusingly similar to the SANOFI mark, and the first element of the Policy is satisfied.

B. Rights or Legitimate Interests

While the overall burden of proof rests with the Complainant, establishing that the Respondent lacks rights or legitimate interests may involve the difficult task of 'proving a negative', since the relevant information is primarily within the Respondent's knowledge or control (see [WIPO Overview 3.0](#), section 2.1).

In this case, according to the evidence submitted, the Complainant has made a prima facie case against the Respondent, who has not been commonly known by the disputed domain name and has neither received consent nor authorization to register or use a domain name incorporating the Complainant's coined and highly distinctive SANOFI mark.

Although the Respondent's default does not by itself establish a lack of rights or legitimate interests, it significantly strengthens the Complainant's position, as there are no apparent circumstances under which the Respondent could claim such rights or interests.

The Panel also notes that the disputed domain name currently resolves to an inactive website. This does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use, particularly in light of the substantial reputation and goodwill of the Complainant's SANOFI mark and the potential to mislead Internet users.

Finally, past UDRP panels have consistently held that impersonation and fraudulent misrepresentation in WHOIS details can never confer rights or legitimate interests (see *Lotus Bakeries N.V. v. van boone, lotusbakeries*, WIPO Case No. [D2025-2857](#)).

Accordingly, the Panel finds that the Complainant has established the second element of the Policy.

C. Registered and Used 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 (see [WIPO Overview 3.0](#), section 3.2.1).

Based on the undisputed information and the evidence provided by the Complainant, the Panel finds it highly unlikely that the Respondent was unaware of the Complainant's trademarks when registering the disputed domain name, since:

- the disputed domain name was created thirty-seven years after the registration of the earliest SANOFI mark;
- the Complainant is one of the leading companies in its field with global reputation and long-standing online presence, including the operation of <sanofi.com> as of 1995;
- the trademarks have been repeatedly recognized as well-known and highly distinctive throughout the world;
- the non-dictionary nature of the term SANOFI incorporated in the disputed domain name implies that the Respondent cannot claim to have accidentally registered a domain name that happens to correspond to the trademarks;

- a simple trademark register search, or even an Internet search, prior to registration of the disputed domain name would have informed the Respondent of the existence of the SANOFI marks;
- past UDRP panels have agreed that SANOFI is one of the most cyber-squatted trademarks (see *Sanofi v. Whois Privacy, Private by Design, LLC / Pramod Mohan*, WIPO Case No. [D2020-2972](#); *Sanofi v. Domain is for Sale at www.dan.com --- c/o Dynadot / Domain Administrator, Domain is for Sale at www.dan.com ---*, WIPO Case No. [D2021-2542](#)).

Accordingly, the Panel concludes that this is not a mere coincidence, but rather is evidence that the Respondent has registered the disputed domain name in bad faith to unfairly capitalize on the Complainant's trademark rights.

Similarly, in the circumstances of this case, the passive holding of the disputed domain name does not prevent a finding of bad faith use under the Policy.

The Panel finds such factors relevant, applying the passive holding doctrine:

- the SANOFI marks are highly distinctive and globally renowned;
- the Respondent has failed to file a response and has provided no explanation or evidence of any actual or contemplated good-faith use of the disputed domain name;
- it is implausible that the Respondent could ever use the disputed domain name in connection with a legitimate offering of goods or services without causing consumer confusion or unfairly exploiting the Complainant's goodwill.

Taken together, these factors lead the Panel to find that the Respondent's passive holding of the disputed domain name constitutes bad faith use under paragraph 4(a)(iii) of the Policy.

Accordingly, the Panel concludes that the Complainant has met its burden of establishing the third element of the Policy.

7. Decision

For the foregoing reasons, in accordance with paragraph 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain name, <sanofi-bj.com>, be cancelled.

/Anton Polikarpov /

Anton Polikarpov

Sole Panelist

Date: September 9, 2025