

ADMINISTRATIVE PANEL DECISION

Sanofi v. Shi Lei

Case No. D2025-3918

1. The Parties

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

The Respondent is Shi Lei, China.

2. The Domain Name and Registrar

The disputed domain name <sanofiglobalconect.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 September 25, 2025. On September 26, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 30, 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 September 30, 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 October 6, 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 October 8, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 28, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 29, 2025.


The Center appointed Anita Gerewal as the sole panelist in this matter on November 3, 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 headquartered in Paris. According to the Complainant, it is the world's fourth-largest pharmaceutical group by prescription sales. The Complainant is involved in the research, development, manufacturing, and marketing of pharmaceutical products, focusing primarily on prescription medicines, while also offering a range of over-the-counter treatments.

Operating in more than 100 countries across all five continents, the Complainant employs around 100,000 people. The Complainant provides a broad portfolio of patented prescription drugs for patients with serious health conditions and holds leading positions in seven major therapeutic areas: cardiovascular diseases, thrombosis, metabolic disorders, oncology, central nervous system disorders, internal medicine, and vaccines.

The Complainant is the owner of numerous SANOFI trademark registrations internationally, including the following:

- United Kingdom Trademark Registration No. UK00001483425 for "SANOFI", in international class 5, and registered on January 15, 1993.
- French Trademark Registration No. 1482708 for "SANOFI", in international classes 1, 3, 4, 5, 10, 16, 25, 28 and 31, and registered on August 11, 1988.
- European Union Trademark Registration No. 000596023 for "SANOFI", in international classes 3 and 5, and registered on February 1, 1999.
- International Trademark Registration No. 591490 , in class 5, registered on September 25, 1992 and designating among others Switzerland, China, Cuba, Romania, the Russian Federation.

The Complainant is also the registrant of numerous domain names consisting of or including the SANOFI trademark under a wide range of generic Top-Level Domains (gTLDs) and country code Top-Level Domains (ccTLDs).

The disputed domain name was registered on July 5, 2025 and currently resolves to a website displaying pay-per-click ("PPC") links.

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 is confusingly similar to its highly distinctive SANOFI trademark, which has no inherent meaning and is instantly associated with the Complainant. The domain incorporates the SANOFI mark in its entirety, with only the addition of the descriptive terms "global" and "connect," which do not dispel confusion and instead suggest an official platform for communication with the Complainant. Neither these descriptive additions nor the ".com" extension alter the overall impression that the disputed domain name is connected to the Complainant.

The Complainant further contends that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant has not authorized or licensed the Respondent to use the SANOFI trademark in any manner, nor is the Respondent affiliated with it. The Respondent is not making a bona fide offering of goods or services; instead, the disputed domain name resolves to a parking page used to divert

Internet users seeking the Complainant. Such use suggests an intent to profit from the SANOFI mark through misleading associations and click-through revenue, which does not qualify as legitimate non-commercial or fair use. Accordingly, the Respondent cannot claim any rights or legitimate interests in the disputed domain name.

The Complainant contends that the disputed domain name was both registered and used in bad faith. Given the worldwide reputation and distinctive character of the SANOFI trademark, the Respondent must have had constructive or actual knowledge of the Complainant's rights, evidencing opportunistic bad faith at registration. The Respondent's use of the domain to host a parking page containing commercial links, designed to mislead users into believing in a connection or endorsement by the Complainant, further demonstrates bad-faith intent to generate revenue by exploiting the Complainant's goodwill.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, in order to succeed, the Complainant must establish each of the following elements:

- (i) The disputed domain name is identical or confusingly similar to the trademark or service mark in which the Complainant has rights;
- (ii) The Respondent has no rights or legitimate interest in respect of the disputed domain name; and
- (iii) The 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, 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 entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other descriptive terms here "global" and "conect" (a misspelling of "connect") may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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.

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.

The Panel observes that the Complainant has no relationship in any way with the Respondent and did not authorize the Respondent’s use of the SANOFI trademark. The Panel also notes that there is no evidence showing that the Respondent might be commonly known by the disputed domain names in the sense of paragraph 4(c)(ii) of the Policy. The Panel notes that the Respondent has “parked” the disputed domain name, and the parking page contains a number of PPC links. Such activity does not provide a legitimate interest in that domain name under the Policy.

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 has deliberately created a domain name that begins with the Complainant’s SANOFI trademark, followed by descriptive terms such as “global” and “connect.” The composition of the disputed domain name clearly indicates that the Respondent had the Complainant’s trademark in mind when registering it. Moreover, the fact that the disputed domain name resolves to a parking page containing PPC links is a further indication of bad-faith use. Accordingly, the Panel concludes that the disputed domain name was registered and is being used in bad faith.

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 <sanofiglobalconect.com> be cancelled.

/Anita Gerewal/

Anita Gerewal

Sole Panelist

Date: November 17, 2025