

ADMINISTRATIVE PANEL DECISION

Sanofi v. Shi Lei
Case No. D2025-4745

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 <sanofipatientconect.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 November 16, 2025. On November 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 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 (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 November 18, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant did not file an amendment to the Complaint.

The Center verified that 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 November 24, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 14, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on December 15, 2025.

The Center appointed Keiji Kondo as the sole panelist in this matter on December 18, 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 (France). Its consolidated net sales was EUR 43 billion in 2022. Historically, the company was formed as Sanofi-Aventis in 2004 by the merger of Aventis and Sanofi-Synthélabo, and changed its name to Sanofi in May 2011. The Complainant's Research and Development portfolio includes 84 projects in clinical development, 26 of which are at advanced stages. The Complainant's worldwide recognition has been shown in an annual worldwide brand survey issued on April 18, 2011.

The Complainant is the owner of many trademarks, and among the Complainant's trademark portfolio is the following trademark registration:

– French trademark SANOFI number 1482708, registered on August 11, 1988 in classes 01; 03; 04; 05; 10; 16; 25; 28; 31, among which class 05 covers pharmaceutical products.

The disputed domain name was registered on October 11, 2025. The disputed domain name resolves to a website displaying links the captions of which contain words relating to pharmaceutical business, such as "prescription", "medication", and "patient".

5. Parties' Contentions

A. Complainant

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

Notably, the Complainant contends that:

The disputed domain name reproduces the Complainant's trademark in its entirety. The Complainant is a multinational company in the pharmaceutical field. The reproduction of the Complainant's trademark as a whole is confusingly similar to the Complainant's trademark.

The disputed domain name comprises: (a) an exact reproduction of the Complainant's trademark, (b) combined with descriptive terms, and (c) followed by a Top-Level Domain suffix ".com". It is well established that the generic Top-Level Domain used as part of a domain name should be disregarded as it does not serve to distinguish domain names. It is also well established that where a domain name wholly incorporates a Complainant's trademark in its entirety, it is confusingly similar to the trademark despite the addition of descriptive terms, in this case, the words "patient" and "conect".

The Respondent does not have any legitimate interest regarding the disputed domain name.

The name of the Respondent has no resemblance with the Complainant's trademark. The word "SANOFI" has no particular meaning and is therefore highly distinctive. The Respondent has neither prior right nor legitimate interest to justify the use of the already well-known and worldwide trademark of the Complainant.

"Redacted for Privacy", indicated on the Whois Database as registrant of the disputed domain name, is not the real registrant; it is the result of a service provided by the Registrar to registrants which offers clients to register domain names in its name and on behalf of third party in order to keep the true identity of the

registrant secret. Consequently, the Respondent has no prior rights and/or legitimate interest to justify the use of the Complainant's trademark.

The Complainant has never licensed or otherwise authorized the Respondent to use its trademark or to register any domain name including it. Consequently, there is no relationship whatsoever between the Complainant and the Respondent. The Respondent has clearly modified the Complainant's trademark for its own use and incorporated it into the disputed domain name without the Complainant's authorization.

The Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services, so as to confer a right or legitimate interest in it in accordance with paragraph 4(c)(i) of the Policy. The disputed domain name is leading to a parking website and has been registered only for the purpose of unfairly attracting Complainant's consumers, as it is clearly revealed on the Respondent's webpage. This demonstrates that the disputed domain name was registered for the sole purpose of misleadingly diverting consumers into thinking that the Respondent is, in some way or another, connected to, sponsored by or affiliated with the Complainant and its business or that the Respondent's activities are approved or endorsed by the Complainant.

Generally speaking, it must be borne in mind that Panel decisions regularly recognize opportunistic bad faith in cases in which the disputed domain name appears confusingly similar to a complainant's well-known trademarks. Moreover, it should be considered that, given the famous and distinctive nature of the Complainant's trademark, the Respondent is likely to have had, at least, constructive notice, if not actual notice, as to the existence of the Complainant's trademark at the time he registered the disputed domain name. This suggests that the Respondent acted with opportunistic bad faith in registering the disputed domain name in order to make illegitimate use of it.

It is obvious that the Respondent registered in bad faith the disputed domain name corresponding to the Complainant's trademark. The Respondent's behavior can in no way be the result of a mere coincidence.

The disputed domain name has obviously been registered for the purpose of creating a likelihood of confusion – or at least an impression of association – between the Complainant's trademark and the disputed domain name. It must be reminded that the Complainant is nowadays one of the world leaders among pharmaceutical companies, ranking first in Europe and ranked fourth in the world in the pharmaceutical industry. Under these circumstances, it is inconceivable that the Respondent registered the disputed domain name without knowledge of the Complainant or its trademark. The Respondent should have registered the disputed domain name for making unfair benefit freeriding the reputation of the Complainant's trademark.

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

B. Respondent

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

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 is the owner of the French trademark registration for SANOFI, and the Complainant's trademark is reproduced in the disputed domain name in its entirety. Addition of "patient" and "conect" would not prevent a finding of confusing similarity. [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.

The Panel finds no similarity between the Respondent's name and the disputed domain name. It is inconceivable that the Respondent has been known by the disputed domain name. In addition, the disputed domain name resolves to a website showing links bearing the terms relating to pharmaceutical business. However, the Complainant has no relationship with the Respondent, and the Complainant has granted the Respondent no license to use the Complainant's trademark as part of a domain name. The Respondent could in no way use the disputed domain name either in connection with a bona fide offering of goods or services, or as legitimate noncommercial or fair use.

Having reviewed the available record, the Panel finds that 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 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.

In the present case, the Panel notes that the Respondent registered the disputed domain name more than thirty-seven years after the Complainant's French trademark registration. Considering the worldwide business of the Complainant, it is inconceivable that the Respondent registered the disputed domain name without intention to cause confusion between the Complainant's trademark and the disputed domain name. In addition, the Panel notes the composition of the disputed domain name, reproducing SANOFI with the term "patient", likely because it is well-known that the Complainant is in the pharmaceutical business. The term "conect" could be regarded as misspelling of "connect", and thus, the disputed domain name as a whole would be interpreted as providing patients with a way of connection with the Complainant.

Accordingly, the Panel finds that the disputed domain name has been registered in bad faith.

The disputed domain name is used to direct Internet users to a website having links showing such terms as "prescription", "medication", and "patient", all of which relate to pharmaceutical business. Although no exact way for commercial gain by the Respondent is known, the type of links are likely conceived to generate a commercial gain (in a broad sense) even if not directly benefitting the Respondent, so it is obvious that the Respondent intentionally attempts to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement of its website.

Accordingly, the Panel finds that the disputed domain name has been 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 <sanofipatientconect.com> be cancelled.

/Keiji Kondo/
Keiji Kondo
Sole Panelist
Date: January 1, 2026