

ADMINISTRATIVE PANEL DECISION

Sanofi v. Becky Adam, Name Redacted
Case No. D2025-4819

1. The Parties

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

The Respondent is Becky Adam, Name Redacted¹, United States of America. (“USA”)

2. The Domain Name and Registrar

The disputed domain name <jobs-sanofi.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 20, 2025. On November 20, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 20, 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, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 11, 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 December 18, 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”).

¹ The Respondent appears to have used the name of the Complainant’s name when registering the disputed domain name. In light of the potential identity theft, the Panel has partially redacted the Respondent’s name from this decision. However, the Panel has attached as Annex 1 to this decision an instruction to the Registrar regarding transfer of the disputed domain name, which includes the name of the Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding, and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on December 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 19, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on January 20, 2026.

The Center appointed Erica Aoki as the sole panelist in this matter on January 23, 2026. 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 global pharmaceutical company headquartered in France and operating in more than 180 countries worldwide. The Complainant is engaged in the research, development, manufacture, and commercialization of pharmaceutical products and healthcare solutions. The Complainant was formed in 2004 following the merger of Aventis and Sanofi-Synthelabo and adopted the name Sanofi in 2011.

Through decades of operation and substantial investment in research, development, and marketing, the Complainant has established significant worldwide goodwill and reputation in the pharmaceutical sector.

The Complainant is the owner of numerous trademark registrations for the trademark SANOFI, which it uses in connection with pharmaceutical products, healthcare services, and related goods and services. These trademark registrations predate the registration of the disputed domain name.

The Complainant owns, among others, the following trademark registrations:

- International Trademark Registration No. 674936, SANOFI, registered on June 11, 1997, covering goods and services including pharmaceutical and medical-related products (notably Class 5 and related classes).
- European Union Trademark No. 000596023, SANOFI, registered on February 1, 1999, covering goods and services including pharmaceutical products and healthcare-related services.
- United States Trademark Registration No. 4178199, SANOFI, registered on July 24, 2012, covering pharmaceutical preparations and related healthcare goods and services.

The Complainant operates several official domain names incorporating its SANOFI trademark, including, among others, <sanofi.com>, which is used to provide information regarding the Complainant's corporate activities, pharmaceutical products, research activities, and investor and patient information.

The disputed domain name was registered on September 9, 2025. According to the available record, the disputed domain name has not been actively used for a bona fide offering of goods or services and has, at relevant times, failed to resolve to an active website. The record further indicates unsuccessful attempts to communicate using email addresses associated with the disputed domain name.

The Complainant asserts that the disputed domain name incorporates its SANOFI trademark in its entirety, together with the descriptive term "jobs," and that such composition suggests an association with the Complainant's employment or recruitment activities.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied all three elements required under paragraph 4(a) of the Policy for the cancellation of the disputed domain name.

First, the Complainant asserts that the disputed domain name is confusingly similar to its well-known SANOFI trademark.

The disputed domain name wholly incorporates the Complainant's SANOFI trademark and merely adds the descriptive term "jobs," which directly relates to employment or recruitment activities.

According to the Complainant, such addition does not prevent the finding of confusing similarity and instead reinforces the false impression that the disputed domain name is associated with the Complainant's recruitment or employment services.

Second, the Complainant submits that the Respondent has no rights or legitimate interests in the disputed domain name.

The Respondent is not affiliated with the Complainant and has never been authorized or licensed to use the Complainant's SANOFI trademark.

The Complainant contends that there is no evidence that the Respondent is commonly known by the disputed domain name.

According to the Complainant, the composition of the disputed domain name creates a misleading impression of affiliation with or endorsement by the Complainant and does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use.

Third, the Complainant argues that the disputed domain name was registered and is being used in bad faith.

The Complainant states that, given the worldwide reputation and longstanding use of the SANOFI trademark, the Respondent must have been aware of the Complainant's rights at the time of registration of the disputed domain name.

The Complainant further submits that the Respondent registered and used the disputed domain name to intentionally attract Internet users by creating a likelihood of confusion with the Complainant's trademark as to source, sponsorship, affiliation, or endorsement, for commercial or other illegitimate purposes, which constitutes bad faith under paragraph 4(b)(iv) of the Policy.

Accordingly, the Complainant requests that the disputed domain name to be cancelled. .

B. Respondent

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

6. Discussion and Findings

Under paragraph 4(a) of the Policy, the Complainant must prove:

- (i) the disputed domain name is identical or confusingly similar to a mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in the disputed domain name; and
- (iii) the disputed domain name was 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 Panel finds that the Complainant has demonstrated rights in respect of the SANOFI trademark for the purposes of the Policy through its multiple registered trademark rights worldwide, which long predate the registration of the disputed domain name.

The disputed domain name incorporates the Complainant's SANOFI trademark in its entirety as its dominant and clearly recognizable element.

The addition of the term "jobs" and the hyphen do not prevent the Complainant's trademark from being clearly recognizable within the disputed domain name. Panels have consistently held that the addition of a descriptive or dictionary term to a complainant's trademark does not prevent the finding of confusing similarity where the trademark remains recognizable ([WIPO Overview 3.0](#), section 1.8).

In the present case, the term "jobs" is descriptive and may refer to an official recruitment or employment-related service associated with the Complainant.

The generic Top-Level Domain ("gTLD") ".com" is a standard registration requirement and is disregarded for the purposes of assessing confusing similarity ([WIPO Overview 3.0](#), section 1.11.1).

Accordingly, the Panel finds that the disputed domain name is confusingly similar to the Complainant's trademark. The first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy sets out a non-exhaustive list of circumstances by which a respondent may demonstrate rights or legitimate interests in a disputed domain name.

While the overall burden of proof in UDRP proceedings rests with the complainant, panels have consistently recognized that proving a respondent's lack of rights or legitimate interests may involve the difficult task of proving a negative, as the relevant information is often within the respondent's knowledge or control.

Accordingly, where a complainant establishes a prima facie case that the respondent lacks rights or legitimate interests, the burden of production shifts to the respondent to come forward with evidence demonstrating such rights or legitimate interests. If the respondent fails to do so, the complainant is deemed to have satisfied the second element of the Policy ([WIPO Overview 3.0](#), section 2.1).

In the present case, 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 is not affiliated with the Complainant and has not been authorized or licensed to use the Complainant's SANOFI trademark in any manner.

There is no evidence that the Respondent has been commonly known by the disputed domain name or by any name corresponding to it.

According to the available record, the disputed domain name has not been actively used for a bona fide offering of goods or services and has, at relevant times, failed to resolve to an active website.

In the absence of evidence of use (or demonstrable preparations to use) the disputed domain name in connection with a bona fide offering of goods or services, such circumstances do not support the finding of rights or legitimate interests under paragraph 4(c)(i) of the Policy. Nor is there evidence of legitimate noncommercial or fair use under paragraph 4(c)(iii).

The Respondent has not submitted any Response or evidence to rebut the Complainant's prima facie showing or to demonstrate any of the circumstances contemplated by paragraph 4(c) of the Policy.

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name.

The second element of the Policy has been established.

C. Registered and Used in Bad Faith

For the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances which, if found to be present, shall be evidence of the registration and use of a domain name in bad faith.

The Panel finds that the evidence in the record establishes that the disputed domain name was registered and is being used in bad faith.

The Complainant's SANOFI trademark is distinctive, well known worldwide, and significantly predates the registration of the disputed domain name. The Complainant has established longstanding international trademark rights and global reputation in the pharmaceutical and healthcare sectors.

Given the longstanding and widespread use of the Complainant's trademark, as well as its global reputation, the Panel finds it implausible that the Respondent was unaware of the Complainant and its trademark at the time of registration.

The disputed domain name incorporates the Complainant's trademark in its entirety together with the term "jobs", which is directly associated with employment and recruitment activities. In the circumstances of this case, this composition suggests targeting of the Complainant and creates a risk of implied affiliation, particularly in the context of potential recruitment-related communications or fraudulent job offers. The Respondent's use of the disputed domain name further supports the finding of bad faith. According to the available record, the disputed domain name has not been actively used for a bona fide offering of goods or services and has, at relevant times, failed to resolve to an active website.

The Panel agrees that the passive holding of a domain name does not necessarily circumvent a finding that the disputed domain name is being used in bad faith within the requirements of paragraph 4(a)(iii) of the Policy. See *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#).

The Respondent has not submitted any Response to explain its registration or use of the disputed domain name, nor to rebut the Complainant's assertions. In the circumstances of this case, the Respondent's failure to participate in the proceedings further supports an inference of bad faith.

In light of the above, the Panel finds that the disputed domain name was registered and is being used in bad faith.

The third element of the Policy has been established.

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 <jobs-sanofi.com> be cancelled.

/Erica Aoki/

Erica Aoki

Sole Panelist

Date: March 6, 2026