

ADMINISTRATIVE PANEL DECISION

Sanofi v. Claude Henry

Case No. D2025-4959

1. The Parties

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

The Respondent is Claude Henry, Côte d'Ivoire.

2. The Domain Name and Registrar

The disputed domain name <sanofifrance.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 27, 2025. On November 28, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On November 28, 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 (Registration Private, 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 1, 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 December 4, 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 December 8, 2025. In accordance with the Rules, paragraph 5, the due date for the Response was December 28, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on December 29, 2025.

The Center appointed Zeynep Yasaman as the sole panelist in this matter on January 7, 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 French multinational pharmaceutical company headquartered in Paris, France, with a presence in more than 180 countries and employing over 90,000 people.

The Complainant is the owner of the trademark SANOFI, which has been registered in various jurisdictions, including:

- The French trademark SANOFI, No. 3831592, registered on May 16, 2011, in classes 1, 3, 5, 9, 10, 16, 35, 38, 40, 41, 42, and 44.
- The French trademark SANOFI, No. 1482708, registered on August 11, 1988, in classes 1, 3, 4, 5, 10, 16, 25, 28, and 31.
- The European Union trademark SANOFI, No. 010167351, registered on January 7, 2012, in classes 3 and 5.
- The European Union trademark SANOFI, No. 004182325, registered on February 9, 2006, in classes 1, 9, 10, 16, 38, 41, 42, and 44.
- The International trademark SANOFI, No. 1091805, registered on August 18, 2011, in classes 1, 3, 5, 9, 10, 16, 35, 38, 40, 41, 42, and 44.
- The United States of America trademark SANOFI, No. 85396658, registered on July 24, 2012, in class 5.

The Complainant owns domain names, including:

- <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 <sanofifrance.com> was registered on November 26, 2025, and does not resolve to any active website.

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, which reproduces the Complainant's highly distinctive and well-known trademark SANOFI is confusingly similar to the Complainant's trademarks. Furthermore, the Complainant argues that the Respondent does not have any legitimate interest regarding the disputed domain name. Regarding the bad faith registration and use of the disputed domain name, the Complainant asserts that, given the famous and distinctive nature of the trademark SANOFI, the Respondent acted with opportunistic bad faith in registering the disputed domain name in order to make an illegitimate use of it. The Complainant adds that even though the disputed domain name resolves to an inactive website, passive holding under the appropriate circumstances falls within the concept of the domain name being used in bad faith, and that the lack of use of the disputed domain name particularly close to those used by the Complainant is likely to cause irreparable prejudice to their general goodwill because Internet users could be led to believe that Complainant is not on the Internet or worse, that Complainant is out of business.

B. Respondent

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

6. Discussion and Findings

A. Identical or Confusingly Similar

Paragraph 4(a)(i) of the Policy requires the complainant to show that the disputed domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights.

Where the complainant holds a nationally or regionally registered trademark or service mark, this *prima facie* satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case (WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.2.1). In the present case, the Panel notes that the Complainant owns registered SANOFI trademarks. Accordingly, the Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy.

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 3.0](#), section 1.7).

The Panel notes that the entirety of the Complainant's SANOFI trademark 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 terms may bear on the assessment of the second and third elements, the Panel finds the addition of the term "france" and the generic Top-Level Domain ".com" 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](#), sections 1.8 and 1.11.1).

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. These are as follows:

(i) before any notice of the dispute, the respondent's use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

- (ii) the respondent (as an individual, business, or other organization) has been commonly known by the domain name, even if the respondent has acquired no trademark or service mark rights; or
- (iii) the respondent is making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

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 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 notes that there is no evidence indicating that the Respondent is commonly known by the disputed domain name. Furthermore, the Complainant has also established that the Respondent is neither affiliated with the Complainant nor authorized or licensed to use the SANOFI trademark or register the disputed domain name.

Where a domain name consists of a trademark plus an additional term (at the second- or top-level), UDRP panels have largely held that such a composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner. Certain geographic terms (e.g., <trademark-usa.com>, or <trademark.nyc>) are seen as tending to suggest sponsorship or endorsement by the trademark owner ([WIPO Overview 3.0](#), section 2.5.1). The Panel notes that SANOFI is a distinctive and well-known trademark, and there is no legitimate explanation on the record as to why the Respondent registered the disputed domain name, which combines the Complainant’s SANOFI trademark with the addition of the name of a country (France), where the Complainant is based. In this regard, the Panel finds that the combination of the Complainant’s SANOFI trademark with the geographical term “France” in the disputed domain name cannot constitute fair use, as it carries a risk of implied affiliation with the Complainant.

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:

- (i) circumstances indicating that the respondent has registered or has acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of its documented out of pocket costs directly related to the domain name; or

- (ii) that the respondent has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that the respondent has engaged in a pattern of such conduct; or
- (iii) that the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or
- (iv) that by using the domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to the respondent's website or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of the respondent's website or location or of a product or service on the respondent's website or location.

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 Complainant's trademarks predate the registration of the disputed domain name and have been recognized as well-known by previous UDRP panels. It has been established in previous UDRP decisions that the registration of a domain name incorporating a widely-recognized or well-known trademark by a third party who has no connection with the trademark is a clear indication of bad faith (see *Pepsico, Inc. v. Domain Admin*, WIPO Case No. [D2006-0435](#); *Veuve Clicquot Ponsardin, Maison Fondée en 1772 v. The Polygenix Group Co.*, WIPO Case No. [D2000-0163](#)). In this regard, the Panel concludes that the Respondent was aware of the Complainant's well-known trademark when registering the disputed domain name and that the disputed domain name has been registered in bad faith by the Respondent.

Although the disputed domain name does not resolve to an active website, panels applying the UDRP have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. Factors that have been considered relevant in applying the passive holding doctrine include: (i) the degree of distinctiveness or reputation of the complainant's mark, (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, (iii) the respondent's concealing its identity or use of false contact details (noted to be in breach of its registration agreement), and (iv) the implausibility of any good faith use to which the domain name may be put ([WIPO Overview 3.0](#), section 3.3.). In the present case, having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant's trademark, the composition of the disputed domain name, the Respondent's failure to submit a response, and the Respondent's concealing its identity through a proxy service and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

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 <sanofifrance.com> be cancelled.

/Zeynep Yasaman/
Zeynep Yasaman
Sole Panelist
Date: January 21, 2026