

ADMINISTRATIVE PANEL DECISION

Sanofi v. Yogatraining 2025, sanofiind
Case No. D2025-5151

1. The Parties

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

The Respondent is Yogatraining 2025, sanofiind, United States of America.

2. The Domain Name and Registrar

The disputed domain name <sanofisupport-sanofi.com> is registered with Tucows Domains Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on December 10, 2025. On December 11, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 16, 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 (Contact Privacy Inc. Customer 0176727013) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 16, 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 23, 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 24, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 13, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on January 14, 2026.

The Center appointed Dilek Zeybel as the sole panelist in this matter on January 20, 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 Sanofi, a French multinational pharmaceutical company headquartered in Paris, engaged globally in the research and development, manufacture, and marketing of pharmaceutical products, primarily for the prescription market, as well as over-the-counter medicines. It operates in more than 180 countries and reported consolidated net sales of EUR 43 billion in 2022 and EUR 37.7 billion in 2021.

The Complainant's trademark SANOFI is protected by numerous trademark registrations in multiple jurisdictions worldwide, including, but not limited to, the following:

- French trademark SANOFI, no. 1482708, registered on August 11, 1988.
- European Union trademark SANOFI, no. 000596023, registered on February 1, 1999.
- International trademark SANOFI, no. 674936, registered on June 11, 1997.

The Complainant also owns a portfolio of domain names incorporating its SANOFI trademark, including <sanofi.com>, <sanofi.eu>, <sanofi.fr>, <sanofi.us>, <sanofi.net>, <sanofi.ca>, <sanofi.biz>, <sanofi.info>, <sanofi.org>, <sanofi.mobi>, and <sanofi.tel>.

The Respondent registered the disputed domain name on November 21, 2025.

At the time of the Complaint and as of the date of this Decision, the disputed domain name resolves to an inactive webpage.

There is no evidence of any relationship between the Complainant and the Respondent.

5. Parties' Contentions

A. Complainant

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

In particular, the Complainant contends that the disputed domain name is confusingly similar to its earlier registered SANOFI trademark and is liable to suggest an affiliation with the Complainant, thereby taking unfair advantage of the reputation of its well-known marks.

Further, the Complainant submits that the disputed domain name reproduces the SANOFI trademark twice and that the addition of the descriptive term "support" does not prevent a finding of confusing similarity, as the SANOFI trademark has no particular meaning and is therefore highly distinctive.

The Complainant also states that the Respondent is not authorized to register or use the Complainant's marks, has no rights or legitimate interests in the disputed domain name, and is not related to the Complainant in any way.

The Complainant further contends that the registration and holding of the disputed domain name adversely affect the Complainant and its well-known marks.

Finally, the Complainant submits that the disputed domain name resolves to an inactive website and that such passive holding, in light of the distinctiveness and reputation of the SANOFI trademark, constitutes evidence of registration and use in bad faith.

The Complainant further relies on the Respondent's use of a privacy protection service as an additional indicator of bad faith.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules directs the Panel as to the principles to be applied in determining the dispute: "A Panel shall decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable."

The Policy provides, at paragraph 4(a), that each of the three elements must be made for a complaint to prevail:

- (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;
- (iii) the disputed domain name has been registered and is being used in bad faith.

Pursuant to paragraph 14(b) of the Rules, where a party does not comply with any provision of the Rules, the Panel may draw such inferences as it considers appropriate.

Considering the Parties' submissions, the Policy, the Rules, the Supplemental Rules, and applicable law, the Panel's findings with respect to each of the above elements are set out below.

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 a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the mark is recognizable 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 the descriptive term "support" may bear on the assessment of the second and third elements, the Panel finds that the disputed domain name, which reproduces the Complainant's SANOFI trademark twice, remains confusingly similar to that 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.

Furthermore, the Respondent registered the disputed domain name without the Complainant’s authorization and is neither a distributor, partner, nor a licensee of the Complainant.

Finally, the Panel notes that the disputed domain name reproduces the Complainant’s SANOFI trademark in its entirety, repeated twice, together with the additional term “support”. This composition of the disputed domain name carries a risk of implied affiliation, which cannot constitute fair use. Such use does not constitute a bona fide offering of goods or services, nor a legitimate noncommercial or fair use, and therefore supports the Panel’s conclusion that the Respondent lacks rights or legitimate interests in the disputed domain name.

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.

By registering the disputed domain name, which incorporates the Complainant’s well-known SANOFI trademark together with the term “support”, and by passively holding the disputed domain name without any active use, the Respondent has failed to demonstrate any plausible good faith use. In this case, such passive holding constitutes evidence of registration and use 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.

Panels have also found that the mere registration of a domain name confusingly similar to a famous or widely-known trademark by an unaffiliated entity may support an inference of bad faith, particularly where combined with other circumstances. The Panel shares this view. [WIPO Overview 3.0](#), section 3.1.4.

Panels 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. [WIPO Overview 3.0](#), section 3.3.

In the present case, the Panel notes that the disputed domain name does not resolve to an active website.

However, under the doctrine of passive holding, the lack of active use does not, as such, prevent a finding of bad faith. In the circumstances of this case, including the reputation of the Complainant’s SANOFI trademark and the absence of any plausible good faith registration and use by the Respondent, the Panel finds that the disputed domain name has been registered and is being used in bad faith.

Further, the Panel notes that the disputed domain name reproduces the Complainant's SANOFI trademark twice, combined with the descriptive term "support" and separated by a hyphen. The Panel finds it implausible that the Respondent arrived at such a specific composition by mere coincidence. Given the well-known status of the SANOFI trademark, the Panel concludes that the Respondent knew or should have known of the Complainant's trademark rights and deliberately targeted the Complainant when registering the disputed domain name.

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 <sanofisupport-sanofi.com> be cancelled.

*/Dilek Zeybel/
Dilek Zeybel
Sole Panelist
Date: February 3, 2026*