

ADMINISTRATIVE PANEL DECISION

Sanofi v. Accounting Department
Case No. D2026-0299

1. The Parties

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

The Respondent is Accounting Department, United States of America (“United States”).

2. The Domain Name and Registrar

The disputed domain name <saanofi.com> is registered with Wild West Domains, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 26, 2026. On January 26, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 26, 2026, 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, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on January 28, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit 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 February 9, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 1, 2026. The Respondent sent email communications to the Center on February 20, 2026, and March 4, 2026.

The Center appointed Manuel Wegrostek as the sole panelist in this matter on March 9, 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

With consolidated net sales of 43 billion Euros in 2022, the Complainant is a French multinational pharmaceutical company headquartered in Paris and one of the world's largest companies in the sector by prescription sales. The Complainant is a full member of the European Federation of Pharmaceutical Industries as well as Associations (EFPIA) and is settled in more than 100 countries on five continents employing 100,000 people. With a Research and Development investment of 6,7 billion Euros in 2022, the Complainant's Research and Development portfolio includes 84 projects in clinical development, 26 of which are at advanced stages.

The Complainant is the owner of several trademarks for SANOFI ("SANOFI Trademark"), including:

- French Trademark Registration SANOFI No 1482708, registered on August 11, 1988;
- European Union Trademark Registration SANOFI No 004182325, registered on February 9, 2006;
and
- United States Trademark Registration SANOFI No 4178199, registered on July 24, 2012. .

The Complainant is also the owner of several domain names including the SANOFI Trademark, such as the domain name <sanofi.com>, registered on October 13, 1995.

The disputed domain name was registered on December 29, 2025. At the time of the Decision and when the Complaint was filed, the disputed domain name resolved to an inactive webpage.

The Respondent submitted a response to the Complaint via email correspondence, stating that (i) the disputed domain name was purchased by an unaffiliated, unauthorized person, (ii) the Respondent has no interest in retaining the disputed domain name and (iii) the Respondent has already initiated a cancellation request. However, there is no corresponding supporting evidence available to the Panel.

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.

On the first element of the Policy, the Complainant claims that the disputed domain name is confusingly similar to the SANOFI Trademark. The disputed domain name reproduces the SANOFI Trademark, which does not have any particular meaning and is therefore highly distinctive. The reproduction of the SANOFI Trademark as the dominant part of the disputed domain name is confusingly similar to the SANOFI Trademark, regardless of the adjunction of the letter "a", which does not eliminate the likelihood of confusion with the well-known SANOFI Trademark, and the generic Top-Level-Domain ("gTLD") extension <.com>. It is well established that the generic top-level designation used as part of a domain name should be disregarded as it does not serve to distinguish domain names. The relevant comparison to be made is with the second level portion of the disputed domain names. It is also well established that where a domain name wholly incorporates a Complainant's distinctive trademark in its entirety, it is confusingly similar to that mark despite the addition of a word or, in this case, a letter. Consequently, the adjunction of the letter "a" in the disputed domain name is undoubtedly insufficient to alleviate the likelihood of confusion between the SANOFI Trademark and the disputed domain name. Finally, it must be taken into account that the likelihood

of confusion is ascertained by the reputation of the Complainant's trade name, trademarks, domain names and more generally speaking goodwill. In this regard, previous panels have already considered that SANOFI Trademark is "well-known" in many jurisdictions.

On the second element of the Policy, the Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent does not have any legitimate interest in using the disputed domain name since the name of the Respondent "Registration Private" has no resemblance with the word "Sanofi". The Respondent has no prior rights and/or legitimate interest to justify the use of the SANOFI Trademark. Further, the Complainant has never licensed or otherwise authorized the Respondent to use its trademarks or to register any domain name including the SANOFI Trademark. Consequently, there is no relationship whatsoever between the parties and the Respondent has clearly modified the SANOFI Trademark for its own use and incorporated it into his domain name without the Complainant's authorization. The Respondent is not making a legitimate noncommercial or fair use of the disputed domain name nor is he 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 given that the disputed domain website is not used legitimately by the Respondent. Indeed, the disputed domain website simply refers to an inactive page. Under these circumstances, the absence of any authorization by the Complainant and the lack of legitimate reason in the use of the disputed domain name both prove that the Respondent has no rights or legitimate interest in respect of the disputed domain name.

On the third element of the Policy, the Complainant asserts that the Respondent has registered and used the disputed domain name in bad faith. It must be borne in mind that panel decisions regularly recognize opportunistic bad faith in cases in which a domain name appears confusingly similar to a Complainant's well-known trademark. Previous panels have already confirmed the famous and distinctive nature of the SANOFI Trademark. Further, there is substantial authority that the registration of a domain name that is confusingly similar to a famous trademark by any entity that has no relationship to that mark is itself sufficient evidence of bad faith registration and use. The Respondent registered in bad faith the disputed domain name corresponding to the trademarks and domain names owned by the Complainant, as this behavior can in no way be the result of a mere coincidence. The Registrant does not have any legitimate interest in using the disputed domain name since the name of the Respondent "Registration Private" has no resemblance with the word "sanofi". The Respondent has neither prior right nor legitimate interest to justify the use of the already well-known and worldwide trademarks and domain names of the Complainant. The disputed domain name has been registered for the purpose of creating a likelihood of confusion – or at least an impression of association – between the SANOFI Trademark and the disputed domain name. Indeed, it must be reminded that SANOFI is nowadays one of the world leaders among pharmaceutical companies. It can only be found that the Respondent must have been undoubtedly aware of the risk of deception and confusion that would inevitably arise from the registration of the disputed domain name since it could lead Internet users searching for official information or SANOFI pharmaceutical products to the website under the disputed domain name. This knowledge characterizes the Respondent's bad faith in registering the disputed domain name. This disputed domain name was not only registered in bad faith but is also being used by the Respondent in bad faith, this is why the website has been disabled. Given the reputed and distinctive nature of the SANOFI Trademark, the Respondent is likely to have had, at least, constructive, if not actual notice, as to the SANOFI 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 an illegitimate use of it. Moreover, the disputed domain name resolves to an inactive website. It has been established in many UDRP cases that passive holding under the appropriate circumstances falls within the concept of the domain name being used in bad faith. Finally, 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 the Complainant is not on the Internet or worse, that the Complainant is out of business.

B. Respondent

The Respondent did not officially submit a Response. The Respondent replied to the Complainant's contentions via email communication on February 20, 2026 and March 4, 2026, as follows:

“The disputed domain name (saanofi.com) was not purchased by us. It was purchased by an unaffiliated, unauthorized person via our Microsoft account. We have no interest in retaining the disputed domain name. We have already initiated a cancellation request with Microsoft on February 12, 2026.”

6. Discussion and Findings

Paragraph 15(a) of the Rules requires that the Panel’s decision be made “on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable”.

The Complainant must evidence each of the three elements required by paragraph 4(a) of the Policy in order to succeed on the Complaint with respect to each disputed domain name, namely that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed 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 Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The applicable Top-Level Domain in a domain name (e.g., “.com”, “.club”, “.nyc”) is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

The disputed domain name contains the SANOFI Trademark in its entirety, with the only difference of the additional letter “A” between the letters “A” and “N”. The Panel finds the mark is recognizable within the disputed domain name. [WIPO Overview 3.1](#), section 1.7. Further, a domain name which consists of a variation of a trademark (typically a common, obvious, or intentional misspelling, referred to as typosquatting) is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. [WIPO Overview 3.1](#), section 1.9.

Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy.

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 that 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 3.1](#), section 2.1.

The Respondent has not provided any evidence for having rights or legitimate interests in the disputed domain name. Rather, the Respondent stated in his emails that he was not responsible for purchasing or registering and has no interest in retaining the disputed domain name.

The Complainant has not authorized licensed or permitted the Respondent to register or use the disputed domain name or to use the SANOFI Trademark. The Panel finds that there are no indications on record that the Respondent is commonly known by the disputed domain name. Further, the disputed domain name is not used for a bona fide offering of goods or services.

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 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.

Panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4.

At the time of the Decision and when the Complaint was filed, the disputed domain name resolved to an inactive webpage. From the inception of the UDRP, panelists 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. While panelists will look at the totality of the circumstances in each case, 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 taking active steps to conceal its identity or (iv) the use of false contact details (noted to be in breach of its registration agreement). Taking the above factors into consideration, panels assess the overall plausibility of any (claimed) good faith use to which the domain name may be put in light of the composition of the domain name in relation to the relevant mark, such that, the more arbitrary or distinctive a mark the less plausible a claimed non-infringing good faith use is likely to be, and vice versa. [WIPO Overview 3.1](#), section 3.3.

Having reviewed the available record, the Panel notes the distinctiveness and reputation of the SANOFI Trademark, the composition of the disputed domain name, containing the SANOFI Trademark in its entirety, with the only difference of the additional letter "A" between the letters "A" and "N", which shows the Respondent's intention to target the SANOFI Trademark, the failure of the Respondent to submit a substantiated response, but rather a mere unsubstantiated allegation of not being responsible for the registration of the disputed domain name, 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 <saanofi.com> be transferred to the Complainant.

/Manuel Wegrostek/

Manuel Wegrostek

Sole Panelist

Date: March 27, 2026