

## **ADMINISTRATIVE PANEL DECISION**

Sanofi v. Rana Hossen  
Case No. D2026-1187

### **1. The Parties**

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

The Respondent is Rana Hossen, Bangladesh.

### **2. The Domain Name and Registrar**

The disputed domain name <sanofius.org> (the “Disputed Domain Name”) is registered with CloudFlare, Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 19, 2026. On March 19, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On March 19, 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 (Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 20, 2026, 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 March 31, 2026.

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 March 31, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 20, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 23, 2026.

The Center appointed Nicholas Weston as the sole panelist in this matter on April 28, 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 that operates a life sciences business in more than 100 countries with consolidated net sales in 2025 of more than EUR 43 billion. The Complainant owns numerous registrations for the SANOFI trademark in multiple jurisdictions, including French trademark Registration No. 1482708 for SANOFI registered on August 11, 1988; European Union Trade mark Registration No. 000596023 for SANOFI registered on February 1, 1999; and International trademark Registration No. 1092811 for SANOFI registered on August 11, 2011.

The Complainant is also the owner of, inter alia, the domain name <sanofi.com> registered on October 13, 1995, which resolves to the company's main website.

The Disputed Domain Name was registered on February 18, 2026, and is inactive.

#### **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 cites numerous trademark registrations for the mark SANOFI, and variations of it, in numerous jurisdictions as prima facie evidence of ownership.

The Complainant submits that its rights in the mark SANOFI predate the Respondent's registration of the Disputed Domain Name and submits that the Disputed Domain Name is confusingly similar to its trademark, for the reason that its well-known trademark is recognizable in the Disputed Domain Name "despite the addition of a word or, in this case, of descriptive terms", namely "the adjunction of the descriptive acronym "us", which stands for "United States"".

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name because it "has never licensed or otherwise authorized the Respondent to use its trademarks or to register any domain name including the above-mentioned trademarks" and infers that none of the circumstances set out in paragraph 4(c) of the Policy apply.

Finally, the Complainant alleges that the registration and use of the Disputed Domain Name was, and currently is, in bad faith. On the issue of bad faith registration, the Complainant submits that "given the famous and distinctive nature of the mark SANOFI, the Respondent is likely to have had, at least, constructive notice, if not actual notice, as to the existence of the Complainant's marks at the time he registered the disputed domain name". On the issue of bad faith use, the Complainant submits that "passive holding under the appropriate circumstances falls within the concept of the domain name being used in bad faith".

##### **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 has the burden of proving the following:

- (i) that the Disputed Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) that the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and
- (iii) that 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.

Based on the available record, the Panel finds 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 Complainant has produced sufficient evidence to demonstrate that it has registered trademark rights in the mark SANOFI in numerous jurisdictions.

Turning to whether the Disputed Domain Name is identical or confusingly similar to the SANOFI trademark, the Panel observes that the Disputed Domain Name is comprised of: (a) the Complainant's trademark SANOFI; (b) followed by the geographic term "us" which is a common abbreviation for the "United States"; (c) followed by the generic Top-Level Domain ("gTLD") ".org".

It is well established that the gTLD used as part of a domain name is generally disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1. The relevant comparison to be made is with the second-level portion of the Disputed Domain Name, specifically: "sanofius".

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 3.1](#), section 1.7.

Although the addition of the geographical term "us" may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the Disputed Domain Name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), 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 Disputed 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 Disputed 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 Panel finds that there is no indication that the Respondent was commonly known by the term “sanofius” prior to registration of the Disputed Domain Name. The Complainant has not licensed, permitted, or authorized the Respondent to use the trademark SANOFI. The Panel also notes that the addition of the term “us” fails to create any legitimate interest in the resulting composite term as it is a geographic term, and the composition of the Disputed Domain Name carries a risk of implied affiliation. [WIPO Overview 3.1](#), section 2.5.1.

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.

The Panel notes the evidence that the Disputed Domain Name resolves to an inactive webpage, which supports the Complainant’s evidence, and finds that this does not represent a bona fide offering of goods or services, or a legitimate noncommercial or fair use, given the substantial reputation and goodwill of the Complainant’s mark or capacity to otherwise mislead Internet users.

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.

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 3.1](#), section 3.2.1.

In the present case, the Panel finds that the evidence in the case shows the Respondent registered and has used the Disputed Domain Name in bad faith.

On the issue of registration, this Panel finds that there is no reason for the Respondent to have registered the Disputed Domain Name other than to trade off the reputation and goodwill of the Complainant’s well-known trademark. [WIPO Overview 3.1](#), section 3.1.4.

Further, a gap of several years between registration of a complainant’s trademark and respondent’s registration of a disputed domain name (containing the trademark) may indicate bad faith registration. In this case, the Respondent registered the Disputed Domain Name some 38 years after the Complainant established registered trademark rights in the SANOFI mark. The Respondent has not come forward to rebut the Complainant’s allegations or to offer an alternative explanation.

On the issue of use, the Disputed Domain Name does not currently resolve to an active website.

Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. Although 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 or inaccurate contact details (noted to be in breach of the respondent’s registration agreement). [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the Complainant’s well-known trademark, the composition of the Disputed Domain Name, and the Respondent’s failure to provide any evidence of actual or contemplated good-faith use, 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 <sanofius.org> be cancelled.

*/Nicholas Weston/*

**Nicholas Weston**

Sole Panelist

Date: May 5, 2026