

ADMINISTRATIVE PANEL DECISION

Sanofi v. Eugenio Chavez Hernandez, Raam Laboratorios
Case No. D2026-1188

1. The Parties

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

The Respondent is Eugenio Chavez Hernandez, Raam Laboratorios, Mexico.

2. The Domain Name and Registrar

The disputed domain name <legalsanofi.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 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 (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 27, 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 April 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 27, 2026.

The Center appointed Alfred Meijboom as the sole panelist in this matter on May 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 pharmaceutical company, with an annual turnover of EUR 43.63 billion in 2025 and operating in more than 100 countries and employing about 100,000 people. The Complainant was formed in 2004 as “Sanofi-Aventis” through a merger and changed its name to “Sanofi” in May 2011.

The Complainant owns a portfolio of SANOFI trademark registrations worldwide, including:

- French trademark SANOFI with registration number 1482708, which was registered on August 11, 1988, for goods in classes 1, 3, 4, 5, 10, 16, 25, 28, and 31;
- European Union trademark SANOFI with registration number 000596023, which was registered on February 1, 1999, for goods in classes 3 and 5; and
- International registration SANOFI with registration number 1092811, which was registered on August 11, 2011, for goods and services in classes 1, 9, 10, 16, 38, 41, and 44.

The Complainant also owns a number of domain names, including <sanofi.com> which was registered on October 13, 1995.

The disputed domain name was registered on February 9, 2026, and resolves to an inactive 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 reproduces the SANOFI trademarks, which, by themselves, have no particular meaning and are therefore highly distinctive, as well as well-known in many jurisdictions, and the reproduction of the Complainant's SANOFI trademarks as the dominant part of the disputed domain name are confusingly similar notwithstanding the addition of the descriptive term “legal,” which is insufficient to prevent any likelihood of confusion.

The Complainant further contends that the Respondent has neither prior rights nor legitimate interests in justifying the use of the already well-known SANOFI trademarks of the Complainant, because the Respondent's name has no resemblance with the disputed domain name, and the Complainant has never licensed or otherwise authorized the Respondent to use the SANOFI trademarks or to register any domain name including such trademarks. According to the Complainant, the Respondent is also not making a legitimate non-commercial or fair use of the disputed domain name, nor is it 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 as the disputed domain name simply resolves to an inactive page.

The Complainant alleges that the Respondent has not registered the disputed domain name in good faith because the absence of legitimate interest somewhat induces the absence of good faith, and the Complainant's SANOFI trademarks are well-known and highly distinctive so that the Respondent is likely to have had, at least, constructive, if not actual notice, as to the existence of the Complainant's SANOFI trademarks at the time of registration of the disputed domain name. According to the Complainant, 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.

The Complainant also contends that the disputed domain name is being used in bad faith because the SANOFI trademarks are well-known and the Respondent acted with opportunistic bad faith in registering the disputed domain name in order to make an illegitimate use of it. The Complainant further contends that it has been established in many cases under the Policy that passive holding under the appropriate

circumstances falls within the concept of the disputed domain name being used in bad faith. According to the Complainant, the lack of use of the disputed domain name, which is 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 present on the Internet or even has ceased operations.

B. Respondent

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

6. Discussion and Findings

The Respondent did not file a Response. However, as set out in section 4.3 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), the consensus view of UDRP panels is that the respondent's default does not automatically result in a decision in favor of the Complainant. The Complainant must still establish each of the three elements required by paragraph 4(a) of the Policy. Although the Panel may draw appropriate inferences from the Respondent's default, paragraph 4 of the Policy requires the Complainant to support its assertions with actual evidence in order to succeed in this proceeding. Paragraph 14(b) of the Rules provides that, in the absence of exceptional circumstances, the panel shall draw such inferences as it considers appropriate from a failure of a party to comply with a provision or requirement of the Rules. The Panel finds that in this case there are no such exceptional circumstances.

Under the Policy, the Complainant must prove that:

- (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; 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 3.1](#), section 1.7.

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

The entirety of the Complainant's SANOFI trademarks is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the Complainant's trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms, here the word "legal", 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 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.

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.

In the present case, the SANOFI trademarks had been registered for decades before the Respondent registered the disputed domain name. The Panel finds that the SANOFI trademark is distinctive and devoid of intrinsic meaning, and has been intensively used in many jurisdictions and is therefore well-known, as confirmed by many previous UDRP panels, including the decisions referred to in the Complaint. 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 well-known trademark, and particularly in the case of coined or fanciful marks, can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4. The Panel is therefore satisfied that the Respondent registered the disputed domain name in bad faith.

Although the disputed domain name does not resolve to an active website, panels have found that the non-use of a domain name (including a blank or “coming soon” page) would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness and reputation of the Complainant’s SANOFI trademark, the composition of the disputed domain name, and the failure of the respondent to submit a response, 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 Complainant contends that the Respondent acted with opportunistic bad faith in registering the disputed domain name in order to make illegitimate use of it, which the Respondent has not refuted. In this case, the Panel considers that the composition of disputed domain name, which consists of the term “legal” in combination with the well-known SANOFI trademark effectively impersonates or suggests sponsorship or endorsement by the trademark owner. In any event, the Panel considers it, on balance, improbable that the disputed domain name could be used for legitimate purposes under the circumstances outlined above.

Consequently, the Panel finds the Respondent’s registration and use of the disputed domain name constitutes bad faith under the Policy, and the Panel finds that the Complainant has also 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 <legalsanofi.com> be cancelled.

/Alfred Meijboom/

Alfred Meijboom

Sole Panelist

Date: May 21, 2026