

ADMINISTRATIVE PANEL DECISION

Sanofi v. Domain Privacy, Domain Name Privacy Inc.
Case No. D2026-2463

1. The Parties

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

The Respondent is Domain Privacy, Domain Name Privacy Inc., Cyprus.

2. The Domain Name and Registrar

The disputed domain name <sanofisampling-us.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 June 6, 2026. On June 8, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same date, 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 0178419370) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 12, 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 June 18, 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 June 19, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 9, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 10, 2026.

The Center appointed Ik-Hyun Seo as the sole panelist in this matter on July 15, 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 pharmaceutical company that develops and manufactures both over-the-counter and prescription medicines in the fields of cardiovascular disease, thrombosis, metabolic disorders, oncology, central nervous system disorders, internal medicine, and vaccines. The Complainant was formed in 2004 as Sanofi-Aventis through the merger of Aventis and Sanofi-Synthélabo, and changed its name to Sanofi in May 2011. The Complainant operates in more than 100 countries and employs approximately 100,000 people. In 2025, it reported consolidated net sales of EUR 43.63 billion. In 2022, the Complainant invested EUR 6.7 billion in research and development. Its current research and development portfolio includes 84 projects in clinical development, 26 of which are at advanced stages. The Complainant owns registrations for the SANOFI trademark in numerous jurisdictions, including French Trademark Registration No. 1482708, registered on August 11, 1988; European Union Trademark Registration No. 010167351, registered on January 7, 2012; and International Trademark Registration No. 1094854, registered on August 11, 2011.

Based on the information provided by the Registrar, the Respondent is identified as “Domain Privacy”, with an address in Cyprus.

The disputed domain name was registered on May 25, 2026. At the time the Complaint was filed, it resolved to a webpage displaying only the phrase “Acheter ce domaine” (French for “Buy this domain”).

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.

Notably, the Complainant contends that the disputed domain name is confusingly similar to the mark in which the Complainant has rights since the disputed domain name incorporates the Complainant’s SANOFI mark, and the descriptive terms “sampling” and “-us”.

The Complainant also contends that the Respondent has no rights or legitimate interests in the disputed domain name and confirms that it has not authorized or licensed rights to the Respondent in any respect. The Complainant further contends that there is no evidence of the Respondent’s use of, or demonstrable preparations to use, the disputed domain name in providing any bona fide offering of goods or services.

Finally, the Complainant contends that the disputed domain name was registered and is used in bad faith. The Complainant contends that SANOFI is a coined term and based on its distinctiveness and fame, the Respondent surely knew of the Complainant and its mark when registering the disputed domain name. For this reason, the Complainant contends that the disputed domain name was registered with opportunistic bad faith in order to create a likelihood of confusion with the famous SANOFI mark, and that lack of actual use of the disputed domain name does not prevent a finding of use in bad faith.

B. Respondent

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

6. Discussion and Findings

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 entirety of the mark 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 3.1](#), section 1.7.

Although the addition of other terms – here, “sampling” and “us” as well as a hyphen – may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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.

Moreover, “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 composition cannot constitute fair use if it effectively impersonates or suggests sponsorship or endorsement by the trademark owner.” [WIPO Overview 3.1](#), section 2.5.1. Here, the disputed domain name incorporates the term “sampling” which is associated with the Complainant's pharmaceutical research business and the geographic term “us” (a country code for United States of America (“United States”)). As a result, the disputed domain name creates the misleading impression that the disputed domain name is associated or affiliated with the Complainant's research business in the United States.

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.

First, panels have found that the mere registration of a domain name that is confusingly similar to a well-known trademark can by itself create a presumption of bad faith. [WIPO Overview 3.1](#), section 3.1.4. Here, the disputed domain name is confusingly similar to the Complainant's trademark SANOFI which is world-famous as the name and mark of the Complainant.

Further, panels have found that the non-use of a domain name 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 trademark, the composition and the for sale nature of the disputed domain name, the lack of any response by the Respondent, and the Respondent's use of an additional "Russian doll" privacy service to hide its identify, 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 <sanofisampling-us.com> be cancelled.

/Ik-Hyun Seo/

Ik-Hyun Seo

Sole Panelist

Date: July 29, 2026