

ADMINISTRATIVE PANEL DECISION

Sanofi v. Franny Cornista
Case No. D2026-2532

1. The Parties

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

The Respondent is Franny Cornista, United States of America.

2. The Domain Name and Registrar

The disputed domain name <sanofifoundation-nortamerica.org> is registered with Spaceship, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on June 11, 2026. On June 11, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 12, 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 (Privacy service provided by Withheld for Privacy) 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 amended Complaint on June 19, 2026.

The Center verified that the Complaint together with the amended 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 13, 2026.

The Center appointed Eric Macramalla as the sole panelist in this matter on July 27, 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 headquartered in Paris, France, ranking among the world's ten largest multinational pharmaceutical companies by prescription sales. The Complainant engages in research and development, manufacturing and marketing of pharmaceutical products for sale, principally in the prescription market.

The Complainant is established in more than 100 countries and employs over 100,000 people. It has recorded consolidated net sales of EUR 43.63 billion in 2025, EUR 41.1 billion in 2024, EUR 43.07 billion in 2023, EUR 43 billion in 2022, EUR 37.7 billion in 2021, EUR 36.04 billion in 2020, EUR 34.46 billion in 2018, and EUR 35.05 billion in 2017.

The Complainant is the owner of numerous trademark registrations comprised of, or containing, SANOFI (the "SANOFI Trademarks"), including the following:

(a) SANOFI, European Union Trademark Registration No. 004182325, filed for use in association with Classes 1, 9, 10, 16, 38, 41, 42, and 44, and issued to registration on February 9, 2006.

(b) SANOFI, European Union Trademark Registration No. 010167351, filed for use in association with Classes 3 and 5, and issued to registration on January 7, 2012.

(c) SANOFI, France Trademark Registration No. 96655339, filed for use in association with Classes 1, 3, 5, 9, 10, 35, 40, and 42, and issued to registration on December 11, 1996.

The Complainant is the owner of numerous domain names, including <sanofi.com>. This domain name was registered on October 13, 1995.

The disputed domain name was registered on June 1, 2026. The disputed domain name has been made to resolve to a website featuring the SANOFI trademark in the website header and the statement "Sanofi Cares North America strives to reduce inequalities in access to medicine, primarily in the US, through strategic product donations aimed at improving access to our products for patients facing barriers related to healthcare insurance coverage or who have been impacted by natural disasters". The website actively solicits donations for people affected by natural disasters.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the three elements required under paragraph 4(a) of the Policy for the transfer of the disputed domain name.

The Complainant has alleged that the disputed domain name is confusingly similar with SANOFI Trademarks in which it has rights. The Respondent has incorporated the whole of the SANOFI trademark in the disputed domain name. Furthermore, the addition of the words "foundation-nortamerica" to the disputed domain name does not diminish confusion.

The Respondent has no rights or legitimate interests in the disputed domain name as contemplated by paragraph 4(c) of the Policy. The Complainant has not authorized the Respondent to use SANOFI Trademarks and is not otherwise connected to the Respondent. The disputed domain name was registered

long after the Complainant established rights in its marks and is being used to operate a website that is designed to mislead end users as to source or sponsorship. The Respondent's activities do not constitute a bona fide offering of goods or services, the Respondent is not commonly known by the disputed domain name, and that the Respondent is not making any legitimate noncommercial or fair use of the domain name. Rather, the Respondent is using the domain name to mislead consumers and divert them for commercial gain.

The disputed domain name was registered and is used in bad faith as per paragraph 4(b)(iv). The Respondent is intentionally attempting to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademarks as to the source or sponsorship.

B. Respondent

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

6. Discussion and Findings

As per paragraph 4(a) of the Policy, to succeed a complainant must establish the following:

- (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 was registered and is being used in bad faith.

These elements are discussed in turn below. In considering these elements, paragraph 15(a) of the Rules provides that the Panel shall decide the Complaint on the basis of statements and documents submitted and in accordance with the Policy, the Rules and any other rules or principles of law that the Panel deems applicable.

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 generic Top-Level Domain is typically disregarded in determining the issue of confusing similarity. [WIPO Overview 3.1](#), section 1.11.1.

The Complainant has established rights in respect of a trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1. The Complainant has established longstanding rights in the SANOFI Trademarks in numerous jurisdictions worldwide.

Furthermore, the Panel finds the mark is recognizable within the disputed domain name. The disputed domain name contains the SANOFI trademark. Under the circumstances, the Panel finds confusing similarity.

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, on a balance of probabilities, that 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 Complainant has not authorized, licensed, or otherwise permitted, the Respondent to use the SANOFI Trademarks in any manner, including as part of a domain name. There is also no evidence that the Respondent is commonly known by the disputed domain name. There is also no basis to conclude that the Respondent is making legitimate noncommercial or fair use of the disputed domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

There is also no evidence that the Respondent has used, or made demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services.

The Panel finds that the Respondent is using the disputed domain name to pass itself off as the Complainant having engaged in the extensive misappropriation of its intellectual property, including its trademark rights. The Respondent is actively seeking to create a false association with the Complainant.

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.

While 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, other circumstances may also 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.

Panels have held that passing off constitutes bad faith ([WIPO Overview 3.1](#), section 3.4). Panels have also consistently found that typosquatting may constitute evidence of bad faith. [WIPO Overview 3.1](#), section 3.1.4.

In the present case, the Respondent has misappropriated the Complainant's trademark rights and trade name with a view to misleading and deceiving potential consumers as to source or sponsorship. The Respondent is using the SANOFI Trademarks and the trade name Sanofi Cares North America in association with a website that appears to falsely solicit donations from members of the public on the pretext of assisting individuals impacted by natural disasters.

Under the circumstances, the Panel finds that the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of its website or location or of a product or service on its website or location (paragraph 4(b)(iv) of the Policy). This constitutes evidence of the registration and use of a disputed domain name in bad faith.

The Panel also concludes that the Respondent had actual knowledge of the Complainant's trademark rights at the time of registering the disputed domain name. The Respondent's conduct also bears the hallmarks of passing off.

The disputed domain name also includes an intentional misspelling of 'northamerica' as the "h" has been omitted. The Panel finds the Respondent's typosquatting activities further support a finding of bad faith. The Panel therefore finds that the Complainant has established the third element of the Policy.

7. Decision

For the foregoing reasons, in accordance with paragraph 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain name <sanofifoundation-nortamerica.org> be cancelled.

/Eric Macramalla/

Eric Macramalla

Sole Panelist

Date: August 10, 2026