ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

# ADMINISTRATIVE PANEL DECISION
Sanofi v. Name Redacted
Case No. D2026-3892

## 1. The Parties

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

The Respondent is Name Redacted. [1]

## 2. The Domain Name and Registrar

The disputed domain name <sanofi-accounting.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 August 31, 2026. On August 31, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 31, 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 (Domains By Proxy, LLC, Registration Private) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 2, 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 September 8, 2026.

[1] The Respondent appears to have used the name of an unrelated individual when registering the disputed domain name. In light of the potential identity theft, the Panel has redacted the Respondent's name from this Decision. However, the Panel has attached as Annex 1 to this Decision an instruction to the Registrar regarding transfer of the disputed domain name, which includes the name of the Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding, and has indicated Annex 1 to this Decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. D2009-1788.

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 September 15, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 9, 2026. The Respondent sent an email communication to the Center on September 28, and September 30, 2026, requesting an extension for filing of the Response under paragraph 5(b) of the Rules. The Center granted the requested automatic four-day extension on October 2, 2026. Therefore, the new due date for Response was October 9, 2026. The Respondent did not file any Response by the extended due date. Accordingly, the Center notified the Commencement of Panel Appointment process on October 13, 2026.

The Center appointed Luca Barbero as the sole panelist in this matter on October 26, 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 based in Paris, specialized in the research, development, manufacturing, and marketing of prescription and over-the-counter medications.

The Complainant is the owner of several trademark registrations for SANOFI, including the following:

- European Union trademark registration No. 004182325 for SANOFI (word mark), filed on December 8, 2004, and registered on February 9, 2006, in classes 1, 9, 10, 16, 38, 41, 42, and 44;

- European Union trademark registration No. 010167351 for SANOFI (word mark), filed on August 2, 2011, and registered on January 7, 2012, in classes 3 and 5;

- United Kingdom trademark registration No. UK00001483425 for SANOFI (word mark), filed on November 21, 1991, and registered on January 15, 1993, in class 5;

- United States trademark registration No. 4178199, for SANOFI (word mark), filed on August 12, 2011, and registered on July 24, 2012, in classes 5, 16, 41, 42, and 44.

The Complainant also owns domain names consisting of "sanofi" in several generic Top-Level Domains ("gTLDs") and country-code Top Level Domains ("ccTLDs"), including <sanofi.com>, registered on October 13, 1995, and used by the Complainant to promote its SANOFI brand and products.

The disputed domain name <sanofi-accounting.com> was registered on July 13, 2026, and does not resolve to an active 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 is confusingly similar to the trademark SANOFI in which the Complainant has rights as it reproduces the trademark in its entirety with the mere addition of the term "-accounting" and the gTLD ".com".

The Complainant submits that the Respondent does not have rights or legitimate interests in the disputed domain name because: i) the Complainant has never licensed or otherwise authorized the Respondent to use its SANOFI trademark in any way including to register any domain name; ii) the Respondent is not commonly known by the disputed domain name; and iii) the Respondent did not use or make demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services or a legitimate activity since the disputed domain name is not pointed to an active website.

With reference to the bad faith requirement, the Complainant contends that, given the famous and distinctive character of the SANOFI mark, the Respondent is likely to have had, at least, constructive, if not actual notice, as to the existence of the Complainant's mark at the time it registered the disputed domain name.

Moreover, the Complainant points out that the disputed domain name has most likely been registered for the purpose of creating a likelihood of confusion between the SANOFI trademark, the Complainant's domain names and the disputed domain name and submits that in doing so the Respondent has acted in opportunistic bad faith.

The Complainant further submits that the Respondent's passive holding of the disputed domain name falls within the concept of use in bad faith and that the lack of use of the disputed domain name, which is particularly similar to those used by the Complainant, is likely to cause irreparable prejudice to its 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**

As detailed in the Procedural History, the Respondent only sent informal email communications to the Center but did not submit any formal Response.

## 6. Discussion and Findings

According to paragraph 15(a) of the Rules: "[a] Panel shall decide a complaint 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". Paragraph 4(a) of the Policy directs that the Complainant must prove each of 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;

(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.

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. Indeed, the Complainant has provided evidence of ownership of several valid trademark registrations for SANOFI.

Although the addition of other terms, here, "-accounting" 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.

As to the gTLD ".com", it is a standard registration requirement and can be disregarded under the first element confusing similarity test. WIPO Overview 3.1, section 1.11.1.

Therefore, 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.

According to the evidence on record, there is no relationship between the Complainant and the Respondent, and the Complainant has not authorized the Respondent to register or use its trademark or the disputed domain name. Moreover, there is no element from which the Panel could infer the Respondent's rights over the disputed domain name, or that the Respondent might be commonly known by the disputed domain name.

In addition, there is no evidence showing that the Respondent ever used the disputed domain name - which does not resolve to an active website - in connection with a bona fide offering of goods or services or a legitimate noncommercial use without intention to misleadingly divert consumers or to tarnish the SANOFI trademark.

Furthermore, considering the composition of the disputed domain name, combining the Complainant's distinctive and well-known trademark SANOFI with the term "-accounting", the Panel finds that the disputed domain name is inherently misleading. Even where a domain name consists of a trademark plus an additional term, 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.

Therefore, the Panel finds the second element of the Policy has also 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 Panel finds that, in light of i) the prior registration and use of the trademark SANOFI by the Complainant; ii) the well-known character of the Complainant's trademark, as also recognized in prior decisions rendered under the Policy; iii) the Complainant's promotion of its brand and products under the SANOFI mark via the website "www.sanofi.com"; and iv) the wide media recognition of the Complainant and its mark, the Respondent knew or should have known the Complainant's trademark at the time of registration of the disputed domain name. WIPO Overview 3.1, section 3.2.2.

Moreover, the registration, in absence of any rights or legitimate interests and lacking any contrary evidence, of a domain name confusingly similar to the Complainant's well-known trademark SANOFI suggests that the Respondent was actually aware of the Complainant's mark and acted with opportunistic bad faith by registering the disputed domain name with the intent to confuse users and induce them to believe that the disputed domain name was held by the Complainant.

Lastly, 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 of the disputed domain name and the failure of the Respondent to submit a response 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.

Therefore, the Panel finds that the Complainant has established the third element of the Policy as well.

**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 <sanofi-accounting.com> be transferred to the Complainant.

*/Luca Barbero/*
**Luca Barbero**
Sole Panelist
Date: November 9, 2026