

ADMINISTRATIVE PANEL DECISION

Rikshiram Aghria v. Ankit Khatri

Case No. D2026-4110

1. The Parties

The Complainant is Rikshiram Aghria, India, self-represented.

The Respondent is Ankit Khatri, India, self-represented.

2. The Domain Name and Registrar

The disputed domain name <sattamatkajico.com> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 12, 2026. On September 14, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 15, 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 (Registration Private, Domains by Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 16, 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 September 17, 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 September 21, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 11, 2026. The Response was filed with the Center on September 21, 2026. The Respondent sent an email communication to the Center on September 23, 2026, confirming his response.

The Center appointed Shwetasree Majumder as the sole panelist in this matter on September 30, 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 an individual based in Odisha, India.

The Complainant is the proprietor of 12 Indian trademark registrations for marks SATTA and SATTA MATKA in stylized form, in Classes 9, 28, 35, 38, 41, 42, and 45. The details of certain of these registrations are set out below:

- Registration No. 6016487 for SATTA (device mark), registered on July 13, 2023, in Class 28;
- Registration No. 6016488 for SATTA (device mark), registered on July 13, 2023, in Class 35; and
- Registration No. 6000631 for SATTA MATKA (device mark), registered on June 30, 2023, in Class 28.

The Complainant has not filed evidence of the use of any of these marks. Further, the Complainant has made no assertions as to the business he carries on, or the goods or services in connection with which he uses, or intends to use, the SATTA or SATTA MATKA marks.

The disputed domain name <sattamatkajico.com> was registered on August 2, 2023. At the time of this decision, the disputed domain name redirected to the website “www.madhurresult.live”. This website is titled “Madhur Bazar | Madhur Satta Matka | Kalyan Matka | Madhur Matka”, which publishes results, charts, and “fix” numbers for various Satta Matka markets, together with a disclaimer stating that the website is for entertainment and information purposes only and is not associated with any “Illegal Matka Business or Gamblers”. The registrant details were held by a privacy service, Domains by Proxy, LLC, and were disclosed by the Registrar in the course of these proceedings.

The Respondent is an individual based in Andaman and Nicobar Islands, India.

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 he is the registered proprietor of the marks SATTA and SATTA MATKA in India, that the disputed domain name reproduces the mark SATTA MATKA in full, and that the addition of “jico” does not dispel confusing similarity. The Complainant submits that he has never authorized the Respondent to use his marks and that, on the basis of the composition of the disputed domain name, the Respondent is operating an online betting platform, which is prohibited in India under section 5 of the Promotion and Regulation of Online Gaming Act, 2025, and cannot be a bona fide offering of goods or services. The Complainant asserts that SATTA MATKA is distinctive and coined, that the Respondent registered the disputed domain name to trade on the Complainant’s goodwill, that his use for unlawful gambling activity tarnishes the Complainant’s marks, and that the concealment of the Respondent’s identity supports a finding of bad faith.

B. Respondent

The Respondent contends that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name.

The Respondent contends that “satta” and “satta matka” are generic Hindi terms that have been in use since the 1960s and are used in more than one hundred domain names and that “jico” is a coined term. He further asserts that the Complainant’s marks are registered for toys in Class 28. The Respondent submits that he has operated an information portal at the disputed domain name since August 2, 2023, which carries a disclaimer and an age verification requirement and accepts no deposits or stakes. The Respondent further asserts that the Promotion and Regulation of Online Gaming Act, 2025, was enacted two years after the disputed domain name was registered, that whether his website offers an online money game is a matter for the authority constituted under that Act and not for a UDRP panel, and requests a finding of Reverse Domain Name Hijacking.

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 SATTA MATKA 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 the term “jico” 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.

The Respondent has used the disputed domain name for a website that publishes results and charts for Satta Matka markets. Satta matka is a generic term colloquially used in India for a number-based

betting game; “satta” means wagering and “matka” means an earthen pot – where the player has to speculate the number which would be taken out from the pot. The Complainant itself uses the term in that sense. The Respondent’s website uses “satta matka” to name the game it covers, and nothing on the record shows that it targets the Complainant’s marks. The Panel finds that the Respondent has used the disputed domain name in its ordinary, descriptive sense and not to target the Complainant’s marks, which is consistent with rights or legitimate interests. [WIPO Overview 3.1](#), section 2.10.1.

The Complainant contends that the Respondent’s website offers an online money game prohibited by section 5 of the Promotion and Regulation of Online Gaming Act, 2025, and that illegal activity cannot confer rights or legitimate interests. [WIPO Overview 3.1](#), section 2.13. The Respondent denies that his website offers any money game. In the Panel’s view, whether the Respondent’s website is unlawful under the Promotion and Regulation of Online Gaming Act, 2025 is a question best dealt with by a court of competent jurisdiction, and this UDRP Panel is not the appropriate forum to decide it. It is a settled principle that where a dispute between the parties exceeds the relatively limited “cybersquatting” scope of the UDRP, it is more appropriately addressed by a court of competent jurisdiction. [WIPO Overview 3.1](#), section 4.14.6.

The Panel finds the second element of the Policy has not 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.

The evidence in the case file as presented does not indicate that the Respondent’s aim in registering the disputed domain name was to profit from or exploit the Complainant’s trademark.

The Complainant’s applications were filed on June 30 and July 13, 2023, between three and five weeks before the disputed domain name was registered on August 2, 2023, and the Complainant has filed no evidence of use for his marks. The Complainant’s assertions that SATTA MATKA is “distinctive and coined” and that its goodwill “took years to build” are unsupported. Apart from a bare assertion of goodwill built over years, the Complaint gives no details of any trading activity under the marks, such as a website, products, services, customers or sales, and no evidence of use has been filed. Notably, the distinctiveness plea is contradicted by the Complainant’s own use of the term as the name of the game. There is no basis to infer that the Respondent was aware of the Complainant or his applications when registering the disputed domain name, or that he chose the disputed domain name for any reason other than the ordinary meaning of “Satta Matka”. The record indicates that the Respondent chose the colloquially used generic term for his website, and nothing suggests that he had prior knowledge of the Complainant’s applications. The Panel finds that the Respondent did not register the disputed domain name in bad faith, as nothing in the record shows that he targeted the Complainant or his marks, which had been applied for only weeks earlier and for which no reputation has been shown. [WIPO Overview 3.1](#), section 3.8.

The Panel finds the third element of the Policy has not been established.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.1](#), section 4.16.

The Complainant brought this Complaint on the strength of applications filed weeks before the disputed domain name was registered, for a term which the Complainant itself uses as the name of a betting game, while describing that term as coined and asserting goodwill built over years without filing any evidence of use. As stated earlier, “Satta Matka” is a generic term used colloquially in India for a number-based betting game; “satta” means wagering and “matka” means an earthen pot, from which the winning number is drawn and on which players bet. The Complainant knew, or ought to have known, that it could not show that the Respondent had targeted it.

The Panel finds that the Complaint has been brought in bad faith and constitutes an attempt at Reverse Domain Name Hijacking.

7. Decision

For the foregoing reasons, the Complaint is denied. The Panel declares that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

/Shwetasree Majumder/

Shwetasree Majumder

Sole Panelist

Date: October 13, 2026