ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Rikshiram Aghria v. Name Redacted
Case No. D2026-4111

1. The Parties

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

The Respondents are Name Redacted, India, self-represented.[1]

2. The Domain Names and Registrars

The disputed domain name <sattamatka.email> is registered with Spaceship, Inc.

The disputed domain name <sattamatka.sale> is registered with GoDaddy.com, LLC (collectively, the "Registrars").

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 Registrars a request for registrar verification in connection with the disputed domain names. On September 14, 2026, and September 15, 2026, the Registrars transmitted by email to the Center their respective verification response disclosing the registrant and contact information for the disputed domain names 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 17, 2026, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on September 18, 2026.

[1] The Respondents have requested that their names be redacted from the published decision because it does not wish those names to appear in connection with the Complainant's allegations of illegal activity. Considering this request and the circumstances of this case, including that the Panel does not determine the allegations of illegal activity, the Panel has redacted the names of the Respondents from this decision. 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Annex 1 to the Registrar as part of the order in this proceeding and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case.

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 Respondents 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 October 1, 2026. The Respondents sent an email communication confirming the response to the Center on October 4, 2026.

The Center appointed Harini Narayanswamy as the sole panelist in this matter on October 8, 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.

The Panel sent Administrative Procedural Order No. 1 to the parties on October 12, 2026, seeking clarification from the Complainant whether transfer or cancellation was sought for the disputed domain name <sattamatka.sale>, which was omitted in the remedy section of the Complaint and the amended Complaint. On October 13, 2026 the Complainant responded stating that transfer of the disputed domain name <sattamatka.sale> was also sought.

The Respondents sent a reply to the Complainant's communication on October 16, 2026, requesting leave to file a supplemental submission concerning the disputed domain name <sattamatka.sale>. The Panel through Administrative Procedural Order No. 2 dated October 22, 2026, allowed the Respondents to file a supplemental submission for the disputed domain name <sattamatka.sale>. The Respondents sent a supplemental submission on October 25, 2026. The Complainant replied to the Respondents' supplemental filing on October 30, 2026.

4. Factual Background

The Complainant is an individual named Rikshiram Aghria who is located in the state of Odisha in India. He owns Indian registered trademarks for SATTA and SATTA MATKA device marks, details of a few are:

SATTA device mark Indian trademark registration number 6016487, date July 13, 2023, class 28.
SATTA MATKA device mark Indian trademark registration number 6000632, date June 30, 2023, class 35.
SATTA MATKA device mark Indian trademark registration number 6022790, date July 15, 2023, class 41.

The Respondents are named as two separate individuals, but acknowledged that they have common control over both the disputed domain names. The disputed domain name <sattamatka.email> was registered on September 25, 2020, and the disputed domain name <sattamatka.sale> was registered on July 12, 2023.

The disputed domain names are composed of common terms. The word "satta" in the Hindi language refers to gambling or betting and the word "matka" refers to an earthen pot. The composite term "Satta Matka" refers to a lottery like numbers game which is a traditional form of gambling.

The Respondents are using the disputed domain names in connection with websites that display results, information, analytics and charts pertaining to "Satta Matka". A disclaimer at the bottom of the <sattamatka.sale> web page states "The information provided on SattaMatka.sale is based purely on numerical calculations and astrology for informational purposes. All data is gathered from public domains on the internet. We are not associated with any illegal gaming, betting or gambling businesses".

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for the transfer of the disputed domain names.

The Complainant contends that the trademark registrations that he owns under class 28 cover games, toys, playthings and gaming apparatus and equipment. The Complainant argues that the Respondents' use of the disputed domain names with his trademarks is in the area of gaming.

The Complainant contends that the Respondents lack rights or legitimate interest in the disputed domain names and it is unlikely that the Respondents have any business identifier under the name. The Complainant further states that the Respondents are using or intending to use the disputed domain names in connection with the gambling game "satta matka", which is prohibited under Indian law, under Section 5 of The Promotion and Regulation of Online Gaming Act, 2025.

The Complainant states that he has no association with the Respondents and has not permitted or licensed the use of the mark. The Complainant states that his trademarks are distinctive and coined and the disputed domain names are registered with a view to profit from the confusion arising with his registered trademarks.

The Complainant argues that the Respondents have registered and used the disputed domain names in bad faith to trade on the goodwill associated with his marks. Arguing further that the Respondents' use of the exact term "satta matka" indicates the Respondents' intention is to attract Internet traffic from "legitimate sources" to the Respondent's online location. Further arguing that the Respondents' intention is to use the disputed domain names for online gambling, which is prohibited under Indian law and indicates bad faith.

B. Respondent

The Respondents have submitted a single response and confirmed that both the disputed domain names have common control. The Panel shall treat the Response as filed on behalf of both the Respondents, and shall hereinafter refer to the Respondents as "the Respondent".

The Respondent contends that the Complainant has not satisfied the three elements required under the Policy for the transfer of the disputed domain names. The Respondent states the disputed domain name <sattamatka.email> was registered on September 25, 2020, which is substantially before the present dispute, and well before the filing and registration of the Complainant's trademarks. The Respondent has filed evidence showing use of the disputed domain name and has filed a record of its website usage. The Respondent has also filed evidence of a communication with Google Adsense, dated April 8, 2021 pertaining to the disputed domain name and historical third party search records for the period 2021 – 2023.

The Respondent submits that the expression "satta matka" has historical public usage independent of use by either party and even before the Respondent registered <sattamatka.email>. In support of this, the Respondent has filed as evidence a write up regarding the historical origin of the term "satta matka".

The Respondent argues that the trademark certificate relied on by the Complainant were filed during June 2023 and July 2023 therefore the Complainant's trademarks did not exist when the Respondent registered the disputed domain name <sattamatka.email> in 2020. The Respondent further argues that there is a disclaimer displayed on the trademark registration certificates which states that:

"This certificate is not for use in legal proceedings or for obtaining Registration abroad."

The Respondent asserts that the cumulative requirements under the Policy have not been met by the Complainant and request denial of the Complaint.

Respondent's Supplemental Submission

Having obtained leave to file filed a supplemental submission regarding the disputed domain name <sattamatka.sale>, the Respondent filed it on October 25, 2026. The Respondent states that he had initially purchased the disputed domain name on March 15, 2022, provided details of the purchase and the customer number provided by Registrar GoDaddy. Other evidence filed by the Respondent include emails dated June 27, 2022, with […] regarding the <sattamatka.sale> "Working Report" and an email of June 28 2022, where Cloudflare had confirmed the activation of the disputed domain name <sattamatka.sale>.

The Respondent states that having missed renewal, he re-registered the disputed domain name <sattamatka.sale> on July 12, 2023, under the same customer account number to continue his earlier project. The Respondent states that he was unaware of Complainant's trademark and he opted for the term "satta matka" based on its common usage in India. The Respondent argues that the term "satta matka" has been used for decades in India, and it is used by numerous other websites and in many domain names.

The Respondent states that the Complainant filed his trademark applications numbers 6000631 and 6000632 on June 30, 2023, just twelve days before the re-registration of the disputed domain name <sattamatka.sale>, and the applications were filed on a proposed to be used basis and published on July 17, 2023, which is five days after re-registration of the disputed domain name <sattamatka.sale>. The Respondent denies that the re-registration of the disputed domain name <sattamatka.sale> was to target the Complainant's mark.

The Respondent disputes that the website material filed by the Complainant establishes activities that targets the Complainant's trademarks and states that it displays numerical results, charts and related information. The Respondent states that no betting deposits, wagers or stakes are accepted through the disputed domain name or any winning amounts paid through it.

The Respondent refers the case *Rikshiram Aghria v. Ankit Khatri*, WIPO Case No. D2026-4110, and states that it involves the same Complainant with substantially the same trademarks, and the complaint was denied with a finding of Reverse Domain Name Hijacking. The Respondent maintains that the Complaint be denied.

Complainant's Reply to the Respondent's Supplemental Submission

The Complainant replied to the Respondent's supplemental submission on October 30, 2026, stating that "due to a genuine difficulty" it was not filed within the stipulated time. The Panel allows the delayed reply.

The Complainant argues that the disputed domain name <sattamatka.sale> was re-registered on July 12, 2023, which is a fresh registration after a previous registration had lapsed. Arguing that when a domain is re-registered, the date of new registration is the one to be considered and not the previous registration. The Complainant adds that he does not challenge the Respondent's earlier registration of 2022.

The Complainant has submitted that the Respondent's document Exhibit S1 shows only a Google Sheet sharing email dated June 27, 2022, and does not show who owned or controlled the domain name. Exhibit S2, Cloudflare activation notice was sent to different email address and was not sent to the Respondent's email address as provided in the domain name registration record and argues that the Respondent's has given no explanation regarding this.

The Complainant argues that Respondent has acknowledged the Complainant's trademarks 6000631 and 6000632 were filed on June 30, 2023, which is 12 days before the Respondent re-registered the disputed domain name on July 12, 2023. The Complainant counters that the Respondent's argument that the trademark applications are filed as "proposed to be used", stating that it is "the normal way of applying in India", and argues that it does not make the Complainant's rights weaker. The Complainant states that the date of filing is what counts and not date of publication and the trademarks are valid till June 30, 2033.

The Complainant rebuts the Respondent's statement that many other domain names and websites use the term "satta matka", stating that it does not prove the Respondent's good faith, rights or legitimate interests. The Respondent's contention that no bets or wagers are accepted, but only shows charts and information, the Complainant argues that it still targets its mark and the Respondent is liable under the Promotion and Regulation of Online Gaming Act 2025 and the Advisory of the Online Gaming Authority of India of July 29, 2026, for indirect inducement and does not confer rights. The Complainant argues that the case cited by the Respondent is not binding precedent and that the Respondent has accepted this. The Complainant requests for transfer of the disputed domain names stating the requirements under the Policy are met.

6. Discussion and Findings

Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("WIPO Overview 3.1"), section 4.11.2.

The Panel finds the Respondents have acknowledged that both the disputed domain names are under common control. The Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants in a single proceeding.

The Policy under paragraph 4 (a) requires the complainant to establish three elements to obtain the remedy of transfer of the disputed domain name under the Policy, these are:

(i) The disputed domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
(ii) The respondent lacks rights or legitimate interests in the disputed domain name; and
(iii) The disputed domain name was registered and is being used in bad faith by the respondent.

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.

It is well established that the Complainant's rights are to be considered at the time the Complainant files the Complaint. The Complainant has shown that it owns registered trademark rights in respect of trademarks or service marks for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

Under the circumstances, although it is not necessary to determine whether the Complainant has unregistered common law rights for the first element, the question of unregistered rights and the timing of accrual of the rights is relevant to other issues arising in this matter. It is therefore expedient to discuss the Complainant's common law rights or the lack of it in the following sections.

The Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the marks for the purposes of the first element of the Policy. WIPO Overview 3.1, section 1.7.

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.

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 Panel finds that the material on record shows that before notice of the dispute to the Respondent, the disputed domain names were used by the Respondent in connection with publishing information, numbers, results and analytical charts for the "satta matka" game. The Respondent has provided evidence of such use of the disputed domain name <sattamatka.email> for few years prior to the filing of the Complainant's trademark applications. The evidence on record shows that the Respondent's use of the disputed domain names corresponds to the meaning of the term "satta matka" and is not being used to exploit or target the Complainant's trademark.

The Panel notes the Complainant's contentions that the use of the disputed domain names by the Respondent in connection with "satta matka" gambling is prohibited under the Indian law, and has cited section 5 of The Promotion and Regulation of Online Gaming Act, 2025. The Respondent has denied that the websites linked to the disputed domain name are being used to place bets, wagers or to pay for any winnings. These contentions raised by the parties pertaining to the Promotion and Regulation of Online Gaming Act, 2025, India are not issues that can be decided by the present forum, but is left for determination by a court of competent jurisdiction. Disputes under the Policy are limited in scope to address abusive registration and use of disputed domain names. Any issues that are not within the scope of the Policy, are more appropriately dealt with 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 by the Complainant.

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 Panel finds that evidence in the case, does not indicate that the Respondent's aim in registering the disputed domain names was to profit or exploit the Complainant's trademarks. The record shows the Complainant's trademarks were filed during June 2023 and July 2023. The disputed domain name <sattamatka.email> was registered in the year 2020 and the Respondent had initially registered <sattamatka.sale> in 2022 and re-registered it in 2023 under the same customer number. It is therefore not plausible that the Respondent registered and used the disputed domain names to target the Complainant.

The Panel further notes, the trademark registrations are not word marks but are stylized device marks filed as "proposed to be used" marks. The evidence on record shows that the Complainant has not used the trademarks prior to the trademark filings in June and July 2023. The Complainant has not offered any evidence showing use of the mark or any common law rights in the mark prior to the trademark filings.

The Complainant's marks are inherently descriptive and are not coined or unique as claimed by the Complainant. As the disputed domain name <sattamatka.email> was acquired by the Respondent prior to the Complainant's trademark filing, the Complainant needed to submit evidence demonstrating existence of rights before the domain name registration to make a valid case that its trademark rights are targeted due to the registration of the disputed domain name.

The Complainant would ordinarily need to file evidence that the trademarks have been used by the Complainant for not an insignificant period, but evidence showing that the marks have been used extensively showing extensive media coverage and evidence of sales turnover figures under the trademarks showing that the marks are recognised by the public as indication the source of goods or services of the Complainant. No such evidence has been filed by the Complainant showing the said trademarks were used prior to 2023 to demonstrate unregistered rights in the trademarks SATTA and SATTA MATKA as an identifier of source.

The disputed domain name <sattamatka.sale> was re-registered by the Respondent on July 12, 2023, and the Complainant has argued that twelve days after the filing of the Complainant trademarks 6000631 and 6000632 which were filed on June 30, 2023. To make a case of the Respondent targeting its mark, evidence of twelve days of significant use of the trademarks before the disputed domain name was acquired by the Respondent needed to be established by the Complainant. No such evidence has been filed by the Complainant. Moreover, the Respondent's earlier registration of <sattamatka.email> in 2020 supports the conclusion that the re-registration of <sattamatka.sale> was consistent with its pre-existing interest in the term "satta matka", rather than prompted by the Complainant's trademark applications or otherwise intended to target the Complainant's marks. In the absence of such evidence, the Panel finds that the Respondent's registration of the disputed domain name on July 12, 2023, does not show that the Respondent targeted the trademark.

Given the generic and descriptive nature of the terms "satta" and "satta matka", the marks are non-distinctive. The burden of proving prior rights in descriptive marks as a source identifier on the Complainant is much higher than for a unique or a coined mark. Under the circumstances, the Complainant ought to have filed evidence showing significant reputation to establish that its marks were targeted, but failed to do so.

The Panel finds for all the reasons discussed, that the Respondent did not register the disputed domain names in bad faith to target the Complainant's trademarks. On the balance of probabilities, the record shows that the Respondent did not register the disputed domain names to impersonate or copy the trademarks.

The Panel finds the Complainant has failed to establish the disputed domain names were registered in bad faith by the Respondent . 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 Panel finds that the present Complaint is not a case of abusive registration of the disputed domain names, but constitutes abuse of the administrative proceeding. The Complainant had knowledge that the Respondent's registration of the disputed domain name <sattamatka.email> preceded the trademark filings by the Complainant and the disputed domain names comprised of common words, yet filed the present Complaint without any supporting evidence that the trademarks had acquired secondary meaning and merely made unsupported allegations and statements in the Complaint.

Under the described circumstances, the Respondent's registration and use of the disputed domain names establishes that the Respondent has not tried to impersonate, copy or exploit the Complainant's trademarks. The Panel finds for these reasons, 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 Respondent shall retain control over the disputed domain names <sattamatka.email> and <sattamatka.sale>.

/Harini Narayanswamy/
Harini Narayanswamy
Sole Panelist
Date: November 4, 2026