

ADMINISTRATIVE PANEL DECISION

Reliance Industries Limited v. Navinkumar Mali, Henama International /
JioSh URL Private Limited
Case No. DSH2025-0002

1. The Parties

The Complainant is Reliance Industries Limited, India, represented by Ajay Sahni & Associates, India.

The Respondent is Navinkumar Mali, Henama International / JioSh URL Private Limited, India, represented by Amar Patil & Company, India.

2. The Domain Name and Registrar

The disputed domain name <jio.sh> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 1, 2025. On December 1, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 2, 2025, 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 and contact information in the Complaint. The Center sent an email communication to the Complainant on December 4, 2025, 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 December 5, 2025.

The Center verified that the Complaint together with the amendment to the Complaint and the amended Complaint satisfied the formal requirements of the .SH Domain Name Dispute Resolution Policy (the “Policy”), the Rules for .SH Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for .SH 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 December 9, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 29, 2025. The Response was filed with the Center on December 26, 2025.

The Center appointed Andrew D. S. Lothian as the sole panelist in this matter on January 14, 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

According to the Complaint (corroborated by its annexed annual report and corporate websites) the Complainant is an Indian multinational conglomerate operating (among others) under the JIO brand and trademark, headquartered in Mumbai, India. Its businesses include energy, petrochemicals, natural gas, retail, telecommunications, mass media, financial services and textiles. It is one of the largest public companies in India by market capitalization and revenue. It is also one of India's largest private tax payers and largest exporters, accounting for more than seven per cent of India's total merchandise exports. The Complainant along with its subsidiaries and affiliate companies constitute the Reliance Industries Limited Group, one of India's largest private sector conglomerates. The said Group's consolidated revenue for financial year 2023 to 2024 is approximately USD119.9 billion. The Complainant states that it is currently ranked at number 86 on the Fortune Global 500 list, is number 49 on the Forbes Global 2000 list for 2024, and has been named "Most Respected Company" in India by BW Businessworld. The Complainant was originally a textiles and polyester company but has evolved into an integrated player across energy, materials, retail, telecommunications, entertainment and digital services, whose products touch almost all Indians daily across economic and social spectrums.

The Complainant's JIO branded services constitute its digital offering. They span connectivity and cloud, media, digital commerce, financial services, gaming, education, healthcare, agriculture, Government to Citizen, smart cities and manufacturing, and include digital capabilities such as Infrastructure as a Service, Platform as a Service, Big Data, Augmented Reality/Virtual Reality, Internet of Things, Blockchain, Artificial Intelligence, Machine Learning, edge computing, speech/natural language, supercomputing, computer vision, robotics and drones. The Complainant has made investments in excess of USD 50 billion which has created the largest and most advanced digital and connectivity ecosystem in India, with a wide range of apps and platforms.

The Complainant first adopted the mark JIO for its telecom business in December 2011, and the JIO brand was announced to the public in January 2013 when the name of the Complainant's telecom services group entity was changed to Reliance Jio Infocomm Limited. On September 5, 2016, said entity launched its telecom services under said brand across India, and the Complainant claims the mark JIO became well known within a short span of time from its launch, whereby said entity achieved over 100 million subscribers within 120 days of launch, and as of September 2025 has achieved 500 million customers, making it one of the largest telecom companies in India based on the number of customers, carrying more than 55 per cent of data traffic in India. The Complainant's revenues in this area increased in the year 2023 to 2024 by 12.7 per cent from the previous year, and its digital services EBITDA (earnings before interest, taxes, depreciation, and amortization) for the year 2023 to 2024 stand at INR 566.97 billion (in excess of USD 6 billion).

The Complainant's JIO digital ecosystem carries more than 10 exabytes (10 million terabytes) of monthly data traffic. The Complainant's mobile network has over 99 per cent population coverage and its JIO branded fiber offering has reached 25 million homes. The Complainant's digital retail offering under the JIO brand features 9,000 digital stores, more than 1 million merchant partners and more than 3 million "Jio Associates". The Complainant offers "Jio Studios" and "Jio Cinema" in the media and content industry with the latter becoming India's top "over the Internet" video platform, which has also acquired the rights of marquee sports tournaments such as FIFA World Cup. The Complainant offers an Indian streaming music app named "JioSaavn" which has acquired the rights to over 80 million music tracks in 16 languages. The Complainant provides with partners an electric vehicle public charging and battery swapping network under the name "Jio-BP". The Complainant provides "JioMart", a cross-category digital commerce platform for grocery, electronics, fashion, home and kitchen, jewelry, beauty and other products. The Complainant offers AJIO, a digital commerce fashion destination featuring national and international brands, which operates

events such as the “Jio World Drive” launch event and “JioMart’s Crafts Mela”. The Complainant’s services are accessible via various websites including “www.jio.com”.

The Complainant owns over 1,400 JIO or JIO-formative trademarks, which are registered or under application. The earliest registered trademarks of the said mark are as follows:

Indian Registered Trademark Number 2247460 in respect of the word mark JIO, filed on and with effect from December 9, 2011, in Class 9 (data processing equipment and computers, among others); and

Indian Registered Trademark Number 2247360 in respect of the word mark JIO, filed on and with effect from December 9, 2011, in Class 38 (wireless broadband communications).

The disputed domain name was registered on June 3, 2021. An undated screenshot of the website associated with the disputed domain name shows that this promoted “an advanced URL shortener service helping you to promote and protect your brand online”. Beneath the introduction in prominent typeface is the phrase “What is JioSh URL?” in which the element “Jio” is in blue and the element “Sh” is in yellow/orange. The remainder of the website promotes link management and analytics solutions and QR codes. On said site, the capitalization of the Respondent’s brand is predominantly “JioSh” although it is occasionally referred to as “Jio.sh”.

The Response has been prepared on behalf of a company named JioSh URL Private Limited, which was incorporated in India on August 10, 2022. Prior to this, the said Company’s predecessor in interest appears to have been known as JioSh International, conforming to an invoice from an IT service provider to that entity dated July 31, 2021, in respect of logo design and content writing. The Respondent shows that said predecessor issued an invoice to a third party on August 8, 2021, in respect of a “starter” plan with seven trial days. Said invoice bears a logo consisting of the capitalized word JIO in blue with a dot in the middle of the “O” from which emanates a three-link chain. The first chain link is a blue oval and the second is an orange oval of equal size. The last link is an orange circle, forming an “o” or dot shape. Beside this last link in a slightly smaller typeface appear the lower case letters “sh”. The said company applied for an Indian registered trademark under application number 5569728 in respect of said logo on August 16, 2022, in Class 42 (providing services of URL activities, Software as a Service, short links, bio links, text message links and email links). The Respondent also applied for an Indian registered trademark under application number 5569100 for the word mark JIOSH on August 14, 2022, in Class 42 covering the same goods and services. Both of these applications were opposed by the Complainant on October 6, 2025.

The Complainant says that it first became aware of the Respondent in 2023, and initiated proceedings before the Regional Director, Ministry of Corporate Affairs, Government of India, seeking an order for the Respondent to change its corporate name (JioSh URL Private Limited) on the basis that it incorporated the Complainant’s JIO trademark in its entirety. A decision was rendered on June 26, 2025, that the Respondent’s corporate name cannot be considered as identical or too nearly resembling the Complainant’s JIO trademark for the purposes of the relevant Indian Companies’ legislation because it contains the additional letters “sh” and the word “URL” in addition to said mark. The Complainant says that it is appealing this decision at present.

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 through its various businesses under the mark JIO it has established goodwill and repute worldwide, including in India. The Complainant provides evidence demonstrating that the High Court of Judicature at Bombay judicially recognized the Complainant’s trademark JIO as a well-known mark in 2021, whereby the Court added that the Complainant “need[s] no introduction”. The Complainant notes that the disputed domain name incorporates the Complainant’s JIO

mark in its entirety, adding that the addition of ".sh" is insufficient to render the disputed domain name dissimilar from the Complainant's said mark.

The Complainant states that the Respondent is not making any legitimate or bona fide use of the disputed domain name, adding that the website associated with the disputed domain name has been designed to deceive and confuse the public at large into believing that it is associated with, affiliated with, a licensee of and/or otherwise operated by the Complainant, noting that it makes prominent use of a logo which deliberately highlights the Complainant's JIO mark in an attempt to ride on the back of the Complainant's substantial reputation and goodwill. The Complainant notes that the Respondent is not affiliated or connected in any manner whatsoever with the Complainant or its group entities, has never had any prior dealings with the Complainant or its affiliates or subsidiaries in connection with the Complainant's JIO business, and has no authorization, leave, license or consent from the Complainant to use the disputed domain name in any manner. The Complainant adds that the Respondent is not making any fair or legitimate use of the disputed domain name.

The Complainant asserts that the Respondent registered the disputed domain name primarily for the purpose of diluting the reputation and goodwill of the Complainant's mark, noting that the Respondent may try to sell, rent, or otherwise transfer the disputed domain name registration to the Complainant or to a competitor thereof, for valuable consideration in excess of the documented out-of-pocket costs incurred by the Respondent in relation to the disputed domain name. The Complainant adds that the Respondent has the objective of misappropriating the Complainant's goodwill and reputation, preventing the Complainant from exercising its legal right to conduct business using a corresponding domain name that reflects its trademark.

The Complainant submits that the Respondent's bad faith is evident from the fact that it deliberately chose to register the disputed domain name while having no association with the Complainant or its group companies, or with the term "jio" and that, by intentionally creating a likelihood of confusion and deception as to the source, affiliation, patronage and/or endorsement of its website, has attempted to attract unsuspecting visitors thereto, resulting in unjust enrichment of the Respondent on the back of the Complainant's hard-earned goodwill and reputation.

B. Respondent

The Respondent contends that the Complainant has failed to satisfy the mandatory requirements of the Policy. Notably, the Respondent submits that the disputed domain name is not identical or confusingly similar to the Complainant's mark in a side-by-side comparison because, according to established jurisprudence under the Policy and also the related UDRP, the disputed domain name must be read and assessed in its entirety (and not in accordance with an artificial dissection of the disputed domain name). In such assessment, the Respondent says that the letters "sh" are not a trivial or descriptive appendage but rather an inseparable and integral part of a new, distinct term with a different visual appearance, phonetic sound, and overall commercial impression.

The Respondent states that the term "jio" in common Indian usage is a dictionary and colloquial expression meaning "live" or "be alive" that is frequently used in non-proprietary, expressive, or descriptive contexts (evidence not provided). The Respondent notes that its company name has been considered dissimilar to the Complainant's trademark. The Respondent also argues that the Complainant's JIO trademark does not extend to an unrelated coined expression such as JIOSH, which constitutes a separate lexical and conceptual identity. The Respondent adds that the Complainant's arguments rely on the asserted fame of its marks and not on an objective comparison as required by the Policy.

The Respondent asserts that its adoption, registration, and use of the disputed domain name falls squarely within the circumstances recognized under Paragraph 4(c) of the Policy as establishing legitimate rights and interests, noting that the Registrar of Companies declined to take any action and effectively confirmed that the Respondent's adoption and use of the expression "JIOSH" was lawful, bona fide, and not misleading, which the Respondent says strongly corroborates its legitimate interest in the disputed domain name.

The Respondent notes that prior to receiving any notice of the present dispute, the Respondent had already registered and actively used the disputed domain name in connection with a bona fide offering of legitimate technology services, namely Software as a Service-based digital solutions including short URLs, bio links, QR codes, and related online visibility tools, adding that it has independently made substantial and demonstrable preparations for, and investments in, the development and operation of its platform under the name “JIOSH”, including domain registration, software development, infrastructure deployment, client onboarding, and marketing activities. The Respondent submits that it has been commonly known by the name “JIOSH” directly corresponding to the disputed domain name, even in the absence of registered trademark rights, adding that it operates under such name in the marketplace, in corporate records and in its dealings with customers and partners.

The Respondent asserts that it is not using the disputed domain name to misleadingly divert consumers, impersonate the Complainant, or tarnish the Complainant’s trademark, adding that the website associated with the disputed domain name makes no reference to the Complainant, its branding, or its business activities, and that its use thereof is legitimate, transparent, and fair, directed towards promoting its own independent services. The Respondent says that the Complainant’s assertions are based primarily on the assumption that any use of a domain name containing the letters “j i o” must necessarily infringe the Complainant’s rights, adding that this assumption is legally incorrect and unsupported by the Policy or precedent, and that the Policy does not prohibit legitimate third-party use of domain names that contain common letter sequences, particularly where such use is independent, bona fide, and unrelated to the complainant’s business.

The Respondent says that the Registrar of Companies’ decision demonstrates that the authorities found no evidence of dishonest intent by the Respondent, even when the Complainant raised similar allegations, adding that the outcome of said proceeding is inconsistent with any claim that the Respondent registered or used the disputed domain name in bad faith. The Respondent notes that at no point has it offered the disputed domain name for sale, solicited the Complainant, or engaged in negotiations relating to any transfer thereof but rather has made use of it for its own operational business. The Respondent submits that it has not engaged in any pattern of conduct designed to prevent the Complainant from reflecting its trademark in a corresponding domain name, and has not registered multiple domain names corresponding to the Complainant’s or any third party’s trademarks, adding that the registration of a single domain name does not constitute a pattern of abusive conduct within the meaning of the Policy. The Respondent adds that the website associated with the disputed domain name is on hold at present but that YouTube videos are available showing its conceptual framework and intended functionality, which demonstrate that there is no replication, imitation or copying of the Complainant’s business models.

The Respondent states that the Parties are not competitors as the Complainant operates in the fields of telecommunications, digital services, media, and retail, whereas the Respondent operates a Software as a Service-based digital platform providing URL shortening, bio links, and QR code services, and there is no overlap in services. The Respondent asserts that the disputed domain name is not being used to disrupt the Complainant’s business.

The Respondent states that it has not used the disputed domain name in an intentional attempt to attract Internet users for commercial gain by creating any likelihood of confusion with the Complainant’s trademark as to source, sponsorship, affiliation, or endorsement, adding that its website and services do not reference the Complainant, do not display the Complainant’s logos or branding, and do not suggest any association with the Complainant, but that users accessing the Respondent’s platform are presented solely with the Respondent’s own independent branding and services. The Respondent notes that panels under the Policy have consistently held that mere awareness of a complainant’s trademark at the time of registration does not, by itself, establish bad faith. There must be evidence of targeting of the complainant’s mark, which it contends is entirely absent in the present case.

The Respondent says that it has made substantial investments in developing its platform, infrastructure, and customer base under the “JIOSH” name, and that such long-term, bona fide commercial activity is fundamentally inconsistent with any allegation of cybersquatting or opportunistic bad faith but rather

demonstrates a legitimate intent to build and operate an independent business that does not exploit or free-ride on the Complainant's reputation. The Respondent states that the Complainant's asserted fame alone is insufficient to establish bad faith or use under the Policy, adding that the Policy addresses clear cases of abusive domain name registration, not the suppression of legitimate businesses by trademark owners.

6. Discussion and Findings

6.1. Preliminary issue: Identity of the Respondent

Paragraph 1 of the Rules defines the Respondent as "the holder of a domain-name registration against which a complaint is initiated". The Panel nevertheless has discretion to substitute or join another entity as a respondent by way of its general powers as set out in paragraph 10(a) of the Rules, and as discussed further below.

Here, the Panel notes that the holder of the disputed domain name is a private individual listed with an organization name of "Henama International", whereas the Response has been filed by a corporate entity named JioSh URL Private Limited. The Response however indicates that the same private individual is a director of the latter company. It should be noted that the Complainant originally chose to direct the Complaint against the said corporate entity rather than the holder of the disputed domain name based presumably upon the fact that the entity's name and address are likely to have been listed on the website associated with the disputed domain name, and the Complainant had also had prior dealings with said entity regarding the dispute over its corporate name.

As far as the Panel is concerned, the Parties appear to be content that JioSh URL Private Limited be joined as a party to this proceeding. The Response demonstrates that the entity has received notice of the Complaint.

Nevertheless, the name of the holder of the disputed domain name will be retained in the instance of this Decision for reasons of continuity and to allow the Registrar to implement the requested remedy in the event of the Complainant's success in the administrative proceeding.

Unless the context otherwise indicates, the Panel refers to the said entity as "the Respondent" throughout this Decision.

6.2. Substantive Issues

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 JIO trademark and the disputed domain name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("WIPO Overview 3.0"), section 1.7.¹

There is no dispute that the Complainant has rights in its JIO registered trademarks within the meaning of the Policy, and the Panel so finds.

¹ Given the similarity of the objectives of the Policy and the UDRP, as well as the similarity of the criteria to be examined under these policies, in this decision, the Panel considers it reasonable and appropriate to refer to previous decisions made by panels under the UDRP and the [WIPO Overview 3.0](#), where appropriate. See also, for example, *IT Product Development LLC v. Host Master, 1337 Services LLC*, WIPO Case No. [DSH2025-0001](#) which likewise adopted this approach.

The comparison is thus between JIO and the disputed domain name, <jio.sh>. The Respondent says that the disputed domain name must be read and assessed in its entirety and not in accordance with an artificial dissection, and that the letters “sh” are not a trivial or descriptive appendage but rather an inseparable and integral part of a new, distinct term.

The applicable Top Level Domain (“TLD”) in a domain name (in this case, “.sh”) is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1. The practice of disregarding the TLD in determining identity or confusing similarity is applied irrespective of the particular TLD; the ordinary meaning ascribed to a particular TLD would not necessarily impact assessment of the first element. The meaning of the TLD may however be relevant to the assessment under the second or third elements of the Policy. In cases where the combination of the mark and the TLD signals potential legitimate co-existence or fair use, and where the related website content supports such inference, as alleged by the Respondent here, panels would tend to focus their inquiry on the second element. [WIPO Overview 3.0](#), section 1.11.2.

In all of these circumstances, the appropriate comparison does not factor in the TLD “.sh”. The entirety of such trademark is reproduced within the Second-Level Domain of the disputed domain name, without alteration or addition. Consequently, the disputed domain name is identical to Complainant’s JIO trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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 whereby the Respondent may demonstrate rights or legitimate interests in a disputed domain name.

Although the overall burden of proof in .SH proceedings is on the complainant, panels have recognized that proving 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 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a *prima facie* case that Respondent lacks rights or legitimate interests in the disputed domain name based upon its submissions that the website associated with the disputed domain name has been designed to deceive and confuse the public at large into believing that it is associated with, affiliated with, a licensee of and/or otherwise operated by the Complainant, that said website makes prominent use of a logo which deliberately highlights the Complainant’s JIO mark, that the Respondent is not affiliated or connected with the Complainant, that it has never had any prior dealings with the Complainant or its affiliates or subsidiaries, that it has no authorization, leave, license or consent from the Complainant to use the disputed domain name in any manner, and that the Respondent is not making any fair or legitimate use of the disputed domain name.

The Panel therefore turns to the Respondent’s case in rebuttal.

The Respondent first claims that “jio” is in common Indian usage as a dictionary term but fails to provide any evidence to support this or any independently derived examples of such usage. The Panel asks itself why such a submission would be relevant if, as the Respondent otherwise asserts, it is coining a new term “Jiosh” with a separate lexical and conceptual identity. In any event, even if the alleged dictionary meaning were relevant, the undeniable and uncontradicted evidence demonstrating the substantial fame of the Complainant and the well-known nature of its JIO mark would tend in this particular case to supplant any

alleged dictionary meaning that might have been brought forward. Furthermore, the alleged "Jiosh" lexical identity does not sit well with the Respondent's logo which both emphasizes the Complainant's JIO mark in larger letters and a different color scheme from the remaining orange, and further maintains the "dot" in the disputed domain name which would more reasonably be de-emphasized in the alleged combined term, unless the Respondent wished to call to mind the Complainant's mark as it appears to do.

The Panel considers that consumers will see the disputed domain name with its "dot" acting as a separator, as most domain names are commonly viewed by the public. The Respondent's capitalization throughout its website does nothing to alter and arguably only reinforces that impression, as the repeated use of either Jio.sh or JioSh also places the focus firmly on the Complainant's mark. As far as the alleged conceptual identity is concerned, the Panel notes that the Respondent has not explained what, conceptually speaking, "Jiosh" might mean to the typical consumer.

There is no particular meaning in the ".sh" TLD here which would corroborate the Respondent's alleged bona fide use or demonstrable preparations to use the domain name (i.e., there is no indication that the Respondent has a legitimately obtained and used trademark covering goods or services connected to the meaning of the relevant TLD), whereby the selection of the TLD might support respondent rights or legitimate interests in the disputed domain name in accordance with [WIPO Overview 3.0](#), section 2.14.2.

The Respondent places much emphasis on the fact that its Company name has been found to be dissimilar to the Complainant's mark in accordance with the Order of the Regional Director, Ministry of Corporate Affairs, India. However, the Panel can place no weight on this Order. It is not a decision under the Policy, or a related policy such as the UDRP, nor does it deal with matters in the way that the Policy would do. Notably, the decision compares the entirety of the Respondent's corporate name, JioSh URL Private Limited, with the Complainant's mark in accordance with aspects of Indian Company legislation, in order to determine the Complainant's objection to the corporate name. Furthermore, and in any case, it cannot be overlooked that the said decision is not final and remains under appeal.

The Respondent asserts that it registered and actively used the disputed domain name, allegedly for a bona fide offering of goods and services, before notice of the dispute. However, to be bona fide, the offering of goods or services must not infringe upon the Complainant's JIO trademark, even if such infringement is unintentional (issues of intent and knowledge being relevant to the third element assessment) (see *Mitchell Kessler Holguin Fortunato v. Roberto ("Bobby") Baldor*, WIPO Case No. [D2025-4090](#) and *On Ag, On Clouds GmbH v. Nguyen Luu, Vuong Hoang, AN NGUYEN, NEO CORP, and Ngoc Tam Nguyen*, WIPO Case No. [D2021-1714](#)).

Here, any apparent use of the disputed domain name relates to digital services (noting that the Respondent specifies Software as a Service, which is a digital service), in direct conflict to the Complainant's provision of other digital services, in respect of which its JIO mark is well-known in India. What is more, only very limited evidence of the offering of goods or services under the disputed domain name has been put forward, in the form of an order in 2016 for a customized Modi Script (the Panel is not told how this is relevant to the disputed domain name which was registered in 2021), and a single invoice for services issued by the Respondent dated August 8, 2021. No evidence of any real import has been provided of the extent of the Respondent's alleged business including revenue, turnover, number of customers, geographic extent of services supplied or similar.

The Respondent claims that it has been commonly known by the disputed domain name in the marketplace, in corporate records, and in dealings with customers. As noted directly above, the evidence here of dealings with customers is extremely scant and does not predate the registration of the disputed domain name. As far as the Respondent's corporate name is concerned, the Panel notes that it was incorporated on August 10, 2022. Even when officially registered, a corporate name does not typically, on its own, lead to a finding of rights and legitimate interests under the Policy (*Royal Bank of Canada v. RBC Bank*, WIPO Case No. [D2002-0672](#)).

The Respondent notes that its website does not specifically refer to the Complainant. However, given (1) the notably prominent use of the Complainant's JIO mark in the Respondent's logo, and (2) the Respondent's chosen capitalization of the term "JioSh" or "Jio.Sh", the Panel finds that the reference is made. Importantly, the Respondent also uses the direct reverse of the logo's color scheme for its JIO element (the word in blue on a white background) to that of the Complainant (the word in white on a blue background). The Panel is satisfied that the Respondent is attempting to call the Complainant's JIO trademark to mind on the website associated with the disputed domain name in these several ways, and that such use cannot confer rights or legitimate interests upon it in terms of the Policy.

The Respondent states that the Policy does not prohibit the use of a common letter sequence in domain names. As a generality, this may be true, particularly in the case of three-character domain names but the problem for the Respondent is that it has not adduced any evidence that the letter sequence in the disputed domain name is such a common sequence, and, more importantly, the weight of the Complainant's evidence demonstrates that this particular three-character sequence represents its well-known mark JIO, particularly in the place where the Parties are based.

The Panel notes that the Respondent has applied for two trademarks corresponding to the disputed domain name, and that these applications are presently opposed by the Complainant. Panels have recognized that a respondent's prior registration of a trademark which corresponds to a domain name will ordinarily support a finding of rights or legitimate interests in that domain name for purposes of the second element.

[WIPO Overview 3.0](#), section 2.12.1. However, the existence of a respondent trademark does not automatically confer rights or legitimate interests on the respondent, and in this case, the fact that the said applications have not proceeded to grant (and are being opposed) means that the Respondent cannot derive rights or legitimate interests therefrom within the meaning of the Policy.

Having considered all of the Respondent's submissions and evidence, the Panel finds that 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 Panel finds the second element of the Policy has been established.

C. Registered or 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 or use of a domain name in bad faith.

As noted in the preceding section, the weight of evidence supporting the strength and well-known nature of the Complainant's JIO mark, particularly in India where the Parties are both based, means that the Respondent cannot deny prior knowledge thereof, neither does it attempt to do so. The remaining question for the Panel under the Policy therefore is whether the Respondent registered or used the disputed domain name in bad faith, that is, with an intent to target the Complainant's said mark unfairly.

The Respondent notes that it has not approached the Complainant to sell the disputed domain name to it, and that there is no evidence that the Respondent has registered multiple domain names in any infringing pattern. The Panel agrees that bad faith is not made out in respect of these topics. However, the Panel does not agree with the Respondent when it says that the Parties are not competitors in that the Respondent operates a Software as a Service digital platform (for URL shortening) while the Complainant is in the business of telecommunications, digital services, media and retail. The evidence shows that the Complainant's business is engaged in the provision of digital platforms and services which have a strong emphasis on the Internet, all under the well-known trademark JIO, whereby it strikes the Panel as unarguable and inevitable that a URL shortening platform branded as the disputed domain name, or as "JioSh" or "Jio.Sh", is likely to cause confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website conform to paragraph 4(b)(iv) of the Policy.

While the Respondent claims that it did not set out to attract Internet users for commercial gain by causing confusion, and that its website and services do not specifically mention the Complainant, the Panel considers that no express mention of the Complainant is necessary for paragraph 4(b)(iv) of the Policy to be made out, particularly, as here, where the Complainant's JIO mark is prominently used in the disputed domain name, and is called to mind both in the most prominent aspect of the design and reversed color scheme of the Respondent's logo, and in the Respondent's chosen capitalization of the term "JioSh" or "Jio.Sh" which contradicts its submissions regarding its alleged use of the term "Jiosh". The Panel observes that the Complainant typically renders its JIO mark as "Jio", whereas the Respondent's logo displays "JIO" in capital letters. This variation is insignificant and would, in the Panel's view, be overlooked by Internet users, especially in light of the Complainant's mark's prominence in the disputed domain name itself and in the logo.

The Respondent argues that it has committed significant resources to a long-term commercial enterprise connected with the disputed domain name. The Panel finds that only limited evidence has been supplied to support this, and notably, as mentioned above the Respondent chose to produce no evidence of turnover, profit, customer numbers, or geographic extent of its service provision. Nonetheless, the Panel considers that expenditure directed toward a bad-faith objective does not transform that objective into one undertaken in good faith.

The Respondent states that the fame of the Complainant's mark is insufficient on its own, given that the Policy addresses cybersquatting and not the suppression of legitimate businesses. As noted above, the well-known nature of the Complainant's mark is on the contrary an important factor in assessing both knowledge and intent to target under the Policy. In adopting in the disputed domain name containing an exact match for such mark, in emphasizing such mark in its chosen logo and (reversed) color scheme, and in using this for digital services in the same broad category as those provided by the Complainant in the same location as the Complainant, the Panel finds that the Respondent had the intention to ride on the back of the substantial reputation and goodwill possessed by the Complainant in its JIO mark. This constitutes cybersquatting under the Policy and, in the circumstances of the present case, both registration in bad faith and use in bad faith of the disputed domain name.

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 <jio.sh> be transferred to the Complainant.

/Andrew D. S. Lothian/
Andrew D. S. Lothian
Sole Panelist
Date: January 26, 2026