



தமிழ்நாடு TAMILNADU 09/12/25
Shirijha.M

ES 723375
தருமதி. N. புவனேஸ்வரி
முத்திரைத்தாள் விற்பனையாளர்
1/613-D, 16வது வீதி, பாலமுருகன் நகர்.
சோழவரம், திருவள்ளூர்-600 067
உரிமம் எண்: 1057-3/ஆ/7/2021

BEFORE TMT.M.SHIRIJHA, B.Sc.,M.L.

SOLE ARBITRATOR, AT CHENNAI

8th December 2025

COMPLAINT INDRP Case No. 2042

IN THE MATTER OF AN
ARBITRATION FOR A DISPUTE
RELATING TO THE DOMAIN
NAME 'www.jiocoin.in' UNDER
THE .IN DOMAIN NAME DISPUTE
RESOLUTION POLICY

Reliance Industries Limited,

3rd Floor, Maker Chambers - IV,

222, Nariman Point,

Mumbai 400021, India

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...Complainant



Versus

Manish

H No. 521, Jain Chowk
Bhiwani, Haryana 127021, India

... Respondent

AWARD PASSED UNDER THE INDRP RULES OF PROCEDURE
AND THE ARBITRATION AND CONCILIATION ACT, 1996

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I. PARTIES TO THE ARBITRATION

1. The Complainant is M/s. Reliance Industries Limited, 3rd Floor, Maker Chambers – IV, Nariman Point, Mumbai 400 021, India represented by their Power of Attorneys Ajay Sahni & Associates at 31/42 Punjabi Bagh, New Delhi 110026 with E-mail: postbox@asahni.co

2. The Respondent is Mr. Manish, H No. 521, Jain Chowk, Bhiwani, Haryana 127021, India .

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II. APPLICABLE LAW AND JURISDICTION

The .IN Domain Name Dispute Resolution Policy

The present arbitration proceeding is under and in accordance with the .IN Domain Name Dispute Resolution Policy (the Policy) which was adopted by the National Internet Exchange of India (NIXI) and sets out the legal framework for resolution of disputes between a domain name registrant and a Complainant arising out of the registration and use of an .IN Domain Name. By registering the domain name 'www.jiocoin.in' with the NIXI accredited Registrar, the Respondent has agreed to the resolution of disputes under the .IN Dispute Resolution Policy and Rules framed thereunder. The Policy and the .IN Domain Name Dispute Resolution Rules of Procedure posted 2020 (the Rules) were approved by NIXI in accordance with the Arbitration and Conciliation Act, 1996.

III. Filing of the Complaint and Constitution of the Arbitral Tribunal

1. The Complainant filed the Complaint under the .IN Domain Name Dispute Resolution Policy against the Respondents, seeking transfer of the Domain Name www.jiocoin.in to the Complainant. Following which, the .IN Registry sought the consent of **Tmt.M.SHIRIJHA** (the undersigned), who is a listed .IN Dispute Resolution Arbitrator under 5 (a) of the Rules, to act as Arbitrator in the said matter.
2. On 30th October 2025, the Arbitral Tribunal consisting of the said **Tmt.M.SHIRIJHA** as Sole Arbitrator was constituted under 5(b) of the Rules in respect of the Complaint filed by the Complainant herein.
3. On the very same day, the learned Arbitrator directed the Complainant to file the Annexures along with the Complaint as the same was not attached and it was complied by the Complainant on the same day but on perusal of the said documents, as the Authorisation document was not available, The Learned Arbitrator directed the Complainant to file the same immediately which was complied and on perusal of the same as it was found that the Authorised Signatory has limited time frame to sign on



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behalf of the Complainant and the Power of Attorney executed by him beyond the said time limit, clarification was sought for by the learned Arbitrator on 4th November 2025 and on 6th November 2025, the Complainant filed the Power of Attorney executed by the Complainant extending the time limit of the Authorised Signatory to act on behalf of the Complainant.

4. After perusal of the same, on 13th November 2025, the Arbitral Tribunal issued the Notice of Arbitration under 5(c) of the Rules. to the parties for commencement of Arbitral Proceedings.

5. The Arbitral Tribunal has been constituted properly and in accordance with the Arbitration and Conciliation Act 1996, the INDRP Policy and the Rules as amended from time to time. No party has objected to the constitution and jurisdiction of the Arbitral Tribunal and to the arbitrability of the dispute.

IV. THE DOMAIN NAME, REGISTRAR & REGISTRANT

The particulars of the registration of the domain name 'www.jiocoin.in' as found in the .IN Registry database are set out below: GoDaddy.com, LLC (the Registrar) at 100 S. Mill Ave Suite 1600 Tempe, AZ 85281, United States of America with Email india_grievanceofficer@godaddy.com

V. PROCEDURAL HISTORY

1. The Sole Arbitrator, Tmt.M.Shirijha was appointed On On 30th October 2025 for the INDRP case no. 2042 regarding the present Complaint filed under the INDRP.

2. Immediately thereafter, on 13th November 2025, the Arbitral Tribunal issued the Notice of Arbitration under 5(c) of the Rules , to the parties for commencement of Arbitral Proceedings and directed the Complainant to serve the said Notice to the Respondent both Online and Offline to the address mentioned therein. The Respondent was given an opportunity to file a response in writing in opposition to the Complaint, if any along with evidence in support of its stand or contention on or before seven

working days from the date of receipt of the said Notice.

3. On 18th November 2025, the Complainant's Power of Attorney informed the Arbitral Tribunal that they have served the copy of the Complaint along with the annexures to the Respondent's E mail address as well as dispatched the physical copy to the Respondent's address which has been duly served on 17th November 2025 and submitted the said delivery proofs.

4. Accordingly, on 3rd December 2025, This Arbitral Tribunal holds that the service on the Respondent was done in accordance with Rule 2(a) of the Rules. Further as the respondent has received the notice via email, quite a long time ago, and has chosen not to either appear before this Tribunal nor file any objections if any, inspite of the sufficient time granted, he was set exparte.

VI. COMPLAINANT'S CONTENTIONS

1. The Complainant is an Indian multinational conglomerate, headquartered in Mumbai, doing businesses including energy, petrochemicals, natural gas, retail, telecommunications, mass media, and textiles. It is the largest public company in India by market capitalization and revenue and largest exporter, accounting for more than 7% of India's total merchandise exports. The Complainant is currently ranked 86th on the Fortune Global 500 list, 49th on the Forbes Global 2000 list for 2024, and In the past five decades, it has expanded their business globally and has become one of the fastest growing companies in India thereby commands tremendous goodwill and reputation in domestic as well as international markets and their products and services are known for their unparalleled quality and innovation.

2. Further The Complainant is the owner of the globally well-known and famous trademark 'JIO' along with other 'JIO' formatives that are registered across several classes and in many jurisdictions and it through its licensee and/or affiliate operates India's leading telecom services business under the trademark 'JIO'. The Complainant, through its group companies and affiliates, has developed, launched, and currently operates a block chain-based digital asset project under the name Jio Coin, which is designed to function as a

proprietary reward token within the Complainant's digital ecosystem. Jio Coin is live and accessible to users through JioSphere, the Complainant's proprietary browser platform. Jio Coin is earned by users who engage with content and perform certain tasks within the JioSphere application, such as browsing, reading news articles, and watching videos. The tokens are issued on the Polygon blockchain and are credited daily to the user's integrated wallet, subject to their activity on the platform which serves as a closed-loop digital reward mechanism intended to incentivize digital engagement and foster deeper integration with the Complainant's services. Importantly, Jio Coin is an official, functional product of the Complainant and forms part of the Complainant's larger digital transformation and Web3 strategy. In January 2025, the Complainant publicly activated its loyalty program under the brand "Jio Coin" within the JioSphere ecosystem. JIO COIN is designated as a reward mechanism for users who browse internet using JioSphere. The Complainant has further announced that Jio Coin will be redeemable against specific services or offers within the Jio ecosystem, thereby creating an internally functional economic loop and extending the token's utility beyond mere browser activity. These developments underscore that Jio Coin is not a speculative cryptocurrency, but rather a controlled, brand-authenticated, reward-driven digital asset anchored in the Complainant's ecosystem. In support of its proprietary rights, the Complainant has secured multiple trademark registrations and applications over the term JioCoin and related variants. The Complainant has also secured protection over related marks such as JioCurrency, JioRupee, JioMoney, JioPayments, and JioPay, which collectively reinforce the Complainant's longstanding interest and legal rights in financial and digital payment services. The Complainant's Jio Coin services are accessible to the world at large through its website www.jiosphere.com. The Complainant through its various businesses under the mark JIO has established itself as a company of tremendous reputation and value across the world, including in India. The earliest registration of the Complainant's JIO mark date back to December 2011, in classes 9 and 38 under numbers 2247460 and 2247360 respectively which is valid and subsisting. The Complainant has been using the 'JIO' trademark continuously, consistently and extensively in respect of the abovementioned products and services that they provide to their customers globally, as a consequence of which the Complainant's 'JIO' trademark enjoys statutory protection and recognition across various jurisdictions. The Complainant also enjoys vast goodwill and reputation under 'JIO' along with other 'JIO' formative marks which have been registered


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under various classes. The Complainant has been extensively promoting its services under its said reputed and renowned trademark 'JIO' by way of advertisements / promotions, events, partnerships and CSR activities across various media, as a consequence of which the stellar goodwill and reputation of the Complainant's trademark 'JIO' is widely recognized throughout the world. The Complainant's website www.ril.com and www.jio.com lists the Complainant's profile and the full range of brands and services offered by the Complainant. the Complainant has acquired a unique reputation and goodwill in the eyes of the general public and trade, and services/products bearing the trademark 'JIO' are exclusively associated with the Complainant alone. The 'JIO' trademark of the Complainant has assumed the distinction of being a well-known and famous trademark and is considered synonymous with the highest quality of services that are offered by the Complainant. The presence of any other entity / individual that uses or incorporates 'JIO' as part of its trademark, trade name and / or domain name would inevitably result in the public and trade getting deceived and misled into assuming that all such services/products are emanating from the Complainant itself

3. The Complainant became aware of the Respondent and his registration of the impugned domain '**jiocoin.in**' recently, in the last week of July, 2025. The Respondent, being completely aware of the Complainant's famous and well-known brand 'JIO' procured the impugned domain name '**jiocoin.in**' in bad faith with the sole objective of squatting and preventing the Complainant from obtaining and/or using the said domain name for its services. The present complaint is being filed against the registration and usage of the impugned domain name '**jiocoin.in**' by the Respondent.

VII. DISCUSSIONS AND FINDINGS:

The Hon'ble Apex Court of India has repeatedly held that even in an uncontested matter the Plaintiff's case must stand on its own legs and it cannot derive any advantage by the absence of the defendants. Accordingly, A Complainant who alleges that the disputed domain name conflicts with its legitimate rights or interests must establish the following three elements required by Paragraph 4 of the INDRP Policy namely:



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- a) The Respondent's domain name is identical and confusingly similar to the trademark or service mark in which the Complainant has rights.
- b) The Respondent has no rights or legitimate interests in respect of the domain name
- c) The Respondent's domain name has been registered or is being used in bad faith.

Accordingly, the Arbitral Tribunal shall deal with each of the elements as under:

a) Whether the Respondent domain name is identical and/or deceptively similar to domain name and trademarks of the Complainant?

- i) The copy of the trademark registration certificate of Trademark 'JIOCOIN' and WHOIS records shows Complainant is the owner of the same in India. Further The Extensive Annexures shows that The Complainant owns numerous trade mark registrations for 'JIO' in various jurisdictions and because of the extensive use and promotion of the 'JIO' trademark, the brand has gained recognition.
- ii) The Complainant provided evidence with the Annexures, to establish that the Disputed Domain name www.jiocoin.in is identical or confusingly similar to the Complainant's registered and distinctive trademark. It is submitted that the word 'JIO' is an arbitrary word that was first adopted by the Complainant in 2011 for its products and services and the mark 'JIO' is inherently distinctive and exclusively associated with the Complainant. It is their contention that the Respondent can, by no stretch of imagination, bonafidely explain the purchase and/or use of the 'jiocoin.in' domain, especially since it is using the Complainant's registered trademarks and pleads that the Respondent illegally and maliciously exploited the circumstances at the time when the impugned domain 'jiocoin.in' was available for purchase and purchased it for the sole purpose of squatting / preventing the Complainant from legitimately obtaining and using the said domain for its 'Jio Coin' services. The Complainant submits that it has established rights in the trade mark 'JIO' for purposes of paragraph 4(a) of the .IN Policy and the dominant features of the Complainant's 'JIOCOIN' trade mark are recognizable in the Domain Name, such that the Domain Name is confusingly similar to the Complainant's mark.

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iii) It is evident that the subject domain name www.jiocoin.in is virtually identical to the trademark 'JIOCOIN' of the Complainant, as claimed by them. The Complainant took the attention of this Tribunal to the decision of the Bombay High Court which has held that the Complainant's trademark JIO as a well-known mark (*Reliance Industries Limited & Anr. vs Ashok Kumar, Commercial IP Suit (L) NO. 14473 of 2021*). It is the further contention of the Complainant that it is settled law that trademarks and domain names are not mutually exclusive and there is an overlap between trademarks and services rendered under domain names as held in *Satyam Infoway Ltd. v. Sifynet Solutions Pvt. Ltd. (2004(3) AWC 2366 SC)* and argues that the Respondent has wrongfully obtained the impugned domain name '**jiocoin.in**', which entirely incorporates the Complainant's registered trademark 'JIO', thereby infringing statutory trademark and common law rights of the Complainant.

iv) They further contend that It is also trite law that the mere addition of the ".in" domain name is insufficient to render the domain name dissimilar to the Complainant's well known and famous 'JIO' trademark, as well as the Complainant's 'jio.com' and other 'JIO' related domain names and cited the decision in *Morgan Stanley vs. Bharat Jain*. Further, it is their main contention that it is widely known that internet users are familiar with the practice of companies using domain names that incorporate their company name, trademark, and/or product or service name. In case of uncertainty, the general public attempts to use such identifying features followed by ".com" ".in", or other generic TLDs. In this context, they plead that the clients and consumers who intend to reach the Complainant's website may end up getting confused and/or deceived and get redirected to the impugned domain '**jiocoin.in**'. Such confusion and/or deception on the part of the public will amount to irreparable loss and damage to the Complainant's stellar reputation and goodwill. While drawing traffic meant for the Complainant's website to the Respondent's impugned domain name, the Respondent will also stand to gain illegal and unlawful revenue by way of selling the impugned domain name at a higher price.

v) The contentions of the Complainant seems to be convincing. Moreover, The

Arbital Tribunal took notice of the decision in *Fendi Sr.I. v. Ndiaye Therese*, WIPO Case No. D2018-0179; *Birdies, Inc. v. Registration Private, Domains By Proxy, LLC/Fu Li*, WIPO Case No. D2019-2134, which through a catena of Orders passed by this Panel and WIPO (under the UDRP), states that domain extensions such as ".com" and ".in" are to be ignored while assessing whether a domain name is identical or confusing similar to a trade mark, the disputed domain name is regarded confusingly similar to that mark for the purposes of UDRP standing. The Arbitral Tribunal also took note of the decisions of WIPO Panel's in *Whatsall12 Inc. v. Warrick Mulder*, JNDRP Case No. 1233, dated July 22, 2020; *Havells India Limited vs. Joio Alappat*, INDRP Case No. 1025, dated October 4, 2018; *Voltas Limited v. Sergi Avaliani*, INDRP Case No. 1257, dated September 22, 2020; and *be/N Media Group L.L.C v. Rima Muliawati* WIPO Case No. D2021-1076. Following the said dicta referred above, and upon the facts and circumstances of the present case and the evidence placed before it, The Tribunal finds that The subject domain name <www.jiocoin.in> is not only identical but deceptively similar to the trademark 'JIOCOIN' of the Complainant. Accordingly, the Arbitral Tribunal holds that the requirement of the first element in the INDRP Policy Paragraph 4(a) is satisfied.

b) Whether the Respondent has no rights or legitimate interests in respect of the domain name?

i) To pass muster under Paragraph 4(b) of the INDRP Policy, the Complainant has to show that the Respondent has no rights and legitimate interests in the disputed domain name under Paragraph 6 of the Policy.

ii) The Complainant asserts that The Respondent has no legitimate rights or interests in the impugned domain name '**jiocoin.in**'; The Respondent is neither known by the name 'JIO', nor does it have any authorization, license, or affiliation with the Complainant, who is the rightful proprietor of the well-known and registered 'JIO' trademarks; The Respondent has adopted the impugned domain name with the clear intent to misappropriate the Complainant's brand equity and unlawfully impersonate the Complainant's business, to commit cheating, theft and misappropriation of data, among other offences; Further, the Respondent has registered the impugned domain name in bad

faith to squat on a domain that rightfully belongs to the Complainant, thereby precluding the Complainant from using the said domain in connection with its legitimate business operations; The registration and usage of the impugned domain 'jiocoin.in' by the Respondent is an attempt to ride on the back of the massive reputation and goodwill that is enjoyed by the Complainant and to pass off the impugned domain name as that belonging to the Complainant; In fact, it is an established principle that a domain name adopted by a Complainant is entitled to equal protection against passing off as in the case of a trademark; In support of this submission, reliance is placed upon the judgments in *Yahoo! Inc. vs Akash Arora & Anr.* (78 (1999) DLT 285) and *Rediff Communication Ltd Vs. Cyberbooth and Anr* AIR 2000 AIR Bom. 27 and various awards in similar JIO based domain name disputes previously passed in favour of the Complainant

iii) The Complainant argues that the Respondent is not affiliated and/or connected in any manner whatsoever with the Complainant or its group entities and has never had any prior dealings with the Complainant or its affiliates and/or subsidiaries in connection with the JIO business of the Complainant and hence there cannot be any legitimate interest or justification made out by the Respondent in respect of claiming any right in the impugned domain name or otherwise. The Respondent has no authorization, leave, license and/or consent from the Complainant to use the impugned domain name in any manner. The Complainant submits that in light of the above factors, it has established a prima facie case that the Respondent lacks rights or legitimate interests in the Domain Name and Accordingly, the burden of production shifts to the Respondent to produce evidence to rebut the Complainant's case and In the absence of such evidence, the Complainant may be deemed to have satisfied the requirements of paragraph 4(b) of the Policy.

iv) A careful perusal of the above shows that the Respondent is not commonly known by the Disputed Domain Name or the name 'www.jiocoin.in' and nor does the Respondent operate a legitimate business or other organisation under the 'JIOCOIN' trademark. Additionally, the said 'JIO' trademark was registered years before the disputed domain name was registered and hence their contention that the Respondent domain name certainly impersonates the Complainant's and the same is



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not bonafide, seems to be convincing and acceptable.

v) When a Complainant makes out a prima facie case that a 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 and If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have proved their case. In the case in hand, the Complainant has made out a prima facie case that the Respondent has no rights and legitimate interests in respect of the disputed domain name www.jiocoin.in as Complainant has never assigned, granted, licensed, sold, transferred, or otherwise authorised Respondent to register or use the Disputed Domain Name or the 'JIO' Trademark and the same is also not used for making legitimate non-commercial use. But the Respondent has failed to appear before this Tribunal and prove if he has any right or interest over the said Trade Mark of the Complainant to use it in the Disputed Domain name. Hence it is held that the Complainant has satisfied the second element under Paragraph 4 (b) of the Policy.

c) Whether the Respondent domain name was registered or is being used in absolute bad faith?

i) The Complainant states that It is abundantly clear that the Respondent holds no rights or legitimate interests in the impugned domain name '**jiocoin.in**'. The registration and use of the impugned domain are therefore plainly in bad faith, with the objective of cheating and misleading the public, committing theft of money, phishing, and wrongfully misappropriating sensitive financial and personal data of consumers, besides squatting and preventing the Complainant from legitimately obtaining and using the said domain for its business.

ii) Based on the Whois report and commercial investigation conducted by the Complainant as well as the aforementioned facts and circumstances, it is submitted that the Respondent has acquired and registered the impugned domain name '**jiocoin.in**'

primarily for the unlawful purpose of diluting the reputation and goodwill of the Complainant mark 'JIO', to mislead and deceive its customers and to squat and prevent the Complainant from bona fide use of the said domain. The Respondent might try to sell, rent, or otherwise transfer the impugned domain name registration to the Complainant which is the owner of the trademark 'JIO' along with several 'JIO' based domain names, or to a competitor of the Complainant, for valuable consideration in excess of the documented out-of-pocket costs incurred by the Respondent in relation to the domain name. They claim that the impugned domain name '**jiocoin.in**' has been acquired by the Respondent with the sole objective of misappropriating and encashing the vast goodwill and reputation subsisting in favour of the Complainant, playing a fraud on innocent individuals and to prevent the Complainant as the owner of the well-known 'JIO' trademark to exercise its legal rights and conduct business using a corresponding domain name that reflects the trademark owned by it. They argue that the mischievous and mala fide conduct of the Respondent is evident from the fact that the Respondent deliberately chose to acquire the impugned domain name '**jiocoin.in**' whilst having no association with either the Complainant or any of its group companies, or with the word 'JIO'. The Respondent, 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 to its website accessible through the impugned domain '**jiocoin.in**', resulting in unjust enrichment of the Respondent on the back of the Complainant's hard-earned goodwill and reputation. In view of the above, the Complainant asserts that the Domain Name was registered and is being used in bad faith in accordance with Paragraph 4(c) of the .IN Policy.

iii) From the evidence placed before this Tribunal it is evident that

Firstly, the Respondent used the 'JIO' trademark without consent from the Complainant.

Secondly, Respondent was aware of Complainant's rights in its well-known trademark as a consequence of Complainant's substantial use of the trademark which predates before the Respondent acquired the domain name.

Thirdly, The domain name is only registered with no apparent legitimate

purpose and holding on to the same with absolute no justification except to make wrongful profit therefrom. Non-use, registration of domain soon after acquisition and passive holding are evidence of bad faith registration.

Fourthly, The Respondent impersonated the Complainant's Trademark 'JIO' which demonstrates its purpose to deceive users for commercial benefit and to harm Complainant's business by redirecting people to the infringing domain name and also making illegitimate commercial gains by banking on the hard-earned goodwill and reputation of the Complainant which is done in bad faith.

iv) In *HSBC Holdings [!_lc v. Hooman Esmail Zadeh*, INDRP Case no 032, dated March 20, 2007; *Visteon Corporation v. Prahlad S.*, INDRP Case No. 1535, dated May 6, 2022; *Solidium Oy v. Privacy Service Provided by Withheld for Privacy ehfl EstormH Etormhosting. Estorm Programming*, WIPO Case No. D2022-3139; *LPL Financial LLC v. Privacy Service Provided by Withheld for Privacy ehf I Steffen Hain*, WIPO Case No. D2022-0542 it was held that the mere registration of an identical domain name by an unaffiliated entity can by itself create a presumption of bad faith.

On careful consideration of the above findings, the Arbitral Tribunal accepts the contentions of the Complainant and holds that the Respondent domain name <JIOCOIN.IN> has been registered with an opportunistic intention and is being used in bad faith and Therefore, the third element in paragraph 4(c) of the Policy has been satisfied.

VIII. DISPOSITIONS

The Arbitral Tribunal holds that The three elements set out in paragraph 4 of the INDRP Policy that

i) The Respondent domain name <JIOCOIN.IN> is identical and confusingly similar to the name, trademark and brand name 'JIO' and 'JIOCOIN' by the Complainant.

ii) The Respondent has no rights or legitimate interests in the Complainant's

Trademark 'JIO' and 'JIOCOIN'

iii) the Disputed Domain name has been registered in bad faith.
have been established by the Complainant and hence It is entitled for the relief sought for.

For the foregoing reasons stated above, The Arbitral Tribunal directs that:
The Disputed Domain Name www.jiocoin.in be transferred to the Complainant as prayed for.

In the Result , Complaint Allowed. No Costs.

Place: Chennai

Dated: 8th December 2025

(**M.SHIRIJHA**)

Sole Arbitrator.



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