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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

\+ W.P.(C) 1479/2026 & CM APPL. 7152/2026

ADIDAS INDIA MARKETING PRIVATE LIMITED.....Petitioner

Through: Mr. Shivang Singh and Ms. Harshita Singh, Advs.

versus

UNION OF INDIA & ORS. .....Respondents

Through: Mr. Ramesh Babu & Ms. Tanya Chowdhary, Advs. for R-4.
Mr. Anmol Mehta, Adv. for R-2.
Mr. Nishant Gautam CGSC Mr. Amit Acharya GP Ms. Kavya Shukla Mr. Vineet Negi, Mr. Naman Sharma & Ms. Theresa, Advs.

CORAM:
HON'BLE MR. JUSTICE JASMEET SINGH

O R D E R

% 13.03.2026

1. This is a writ petition filed under Article 226 of the Constitution of India seeking the following prayers:-

> *"i. Order or direction directing the Respondent No. 1 along with the Police authorities to formulate, notify, and implement uniform guidelines/uniform Standard Operating Procedure (SOP) for issuance of bank account freeze orders, debit restrictions and lien marking in cybercrime cases nationwide;*
>
> *ii. Order or direction directing the Respondents to ensure that no bank account is frozen or subjected to lien without prior verification of the account holder's involvement in the alleged offence, recording of reasons for such actions, and*

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mandatory service of notice/intimation to the account holder within a reasonable time period;

iii. Order or direction directing the Respondents to establish nationwide coordination mechanism (digital or otherwise) to prevent multiple FIRs or complaints generating duplicate or overlapping issuance of multiple liens marking on the same amount by different police stations, and inconsistent or arbitrary actions;

iv. Order or direction directing the Respondent No. 2 and 3 to remove any such liens already created by it;

v. Order or direction restraining the Respondent No. 2 from creating any future lien on the amounts lying in the bank account of the Petitioner;

vi. Order or direction directing Issue appropriate guidelines for safeguards in freezing amounts lying in the bank accounts under cyber or frivolous complaints;

vii. Order or direction directing the Respondent No. 2 and 3 to develop and implement a transparent communication protocol mandating that every freeze/lien action be immediately communicated to the customer with details of the issuing police station, FIR number, amount and nature of restriction, and procedure for redressal and clarification;

viii. Order or direction directing the Respondent No. 2 and 3 to establish or strengthen a dedicated grievance-redressal mechanism for victims of cyber-fraud whose bank accounts are frozen and marked as lien, so that innocent citizens may

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seek timely relief without being forced into prolonged financial hardship;

ix. Order or direction directing the Respondents to undertake public awareness programmes regarding the cyber-crime reporting mechanism, the rights of account holders, and the safeguards available against arbitrary freezing of accounts..”

2. The brief facts of the case are that multiple lien have been marked on petitioner’s account based on the third party cyber crime complaints and various freeze orders have been passed.

3. Mr. Singh, learned counsel for the petitioner, states that the petitioner is a multinational company and there are no irregularities or violation of law committed by the petitioner. Additionally, the petitioner has chain retail outlets and only does transactions for buying and selling of sportswear. The petitioner has no involvement in any of the cyber complaints.

4. The prayers only seek that the petitioner must be entitled to make representations and get appropriate redressal of its complaints before the accounts are put on debit freeze and lien.

5. Mr. Gautam, learned CGSC appears for respondent no. 1 and states that the Standard Operating Procedure (“***SOP***”) is already placed and the same is operational.

6. Hence the petitioner’s first prayer stands satisfied and the petitioner is entitled to avail the remedies under the SOP. The other prayers of the petition are dependent on the prayer No. 1.

7. The operative paragraph of SOP dated 02.01.2026 reads as under:

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"10.1 In case of grievances related to the amount put on hold effected by NCRP-CFCFRMS, the following process will be followed:

a) A person affected by such an action will approach the Bank branch where her account exists or any other designated branch or office. The bank will undertake CDD as prescribed in relevant RBI circulars and Master Directions, updated from time to time and the justifications submitted by the person, exercise Enhanced Due Diligence (EDD) and if convinced about the bona fides of the transaction, submit the grievance to the Grievance Redressal Module of CFCFRMS with the necessary justifications submitted by the aggrieved person. Banks and FIs would be expected to submit such a grievance at the earliest and not beyond 07 calendar days from the day the aggrieved person complains.

b) The grievance will be assigned by the concerned SHO to the IO or Police officer under intimation to the concerned District Grievance Officer. If there are multiple holds, the grievance will be assigned by the concerned SHOs to the concerned IOs or Police officers under intimation to the District Grievance Officers.

c) The IO or Police Officer of the case shall verify the grievance. She shall issue a notice (physical or electronic) to the account holder in whose account the reported amount is put on hold to appear for verifications, preferably through a video conference. A representative of the aggrieved person's

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bank branch (preferably grievance redressal officer) may also be included in the videoconference or otherwise involved with the process of verifications. The account holder or the person raising the grievance on behalf of the account holder should not be called to appear in person before the IO or Police officer, unless deemed to be unavoidable during a course of the investigation, and an FIR or e- FIR is issued in the case. To the extent possible, videoconferencing should be opted.

d) For verifications, the IO or Police Officer may also take the assistance of the concerned Police Station of the area where the account holder resides. For this, the CIAR module of the Samanvaya Platform can be used. If satisfied with the verifications and the explanations submitted, he will direct the concerned banks to remove the hold on the reported amount within 15 calendar days of the receipt of the grievance. The Bank or FI concerned shall remove the hold on the reported amount and shall update the same on the Grievance Redressal Module.

e) If the IO or Police Officer is not satisfied with the explanation submitted by the aggrieved person, she shall submit her remarks on the Grievance Redressal Module within 15 calendar days of raising the grievance by the bank, duly recording the reasons and the same will be communicated to the account holder by SMS/email.

f) If the IO or Police Officer or the authorised Police Officer

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doesn't address the grievance raised within a period of 15 calendar days, then on the completion of 15 calendar days, the grievance will be automatically notified to the District Grievance Officer. If the account holder is not satisfied with the orders of the IO or Police Officer, she may file a review request within 15 calendar days of receiving intimation by visiting the designated bank branch, which will then be reviewed by the District Grievance Officer. The reviewing officer will go through the details submitted, reasons offered by the IO or Police Officer, may seek additional information from banks, pass appropriate instructions to the IO or Police Officer and update her decision on the Grievance Redressal Module within 15 calendar days of being notified. As instructed by the District Grievance Officer, the IO or Police Officer shall take appropriate action and update the portal within 2 calendar days. Banks and FIs should furnish the requested information at the earliest and not later than 2 calendar days to enable expeditious disposal of the grievance. In case no lawful directions regarding continuation or discontinuation of the hold (where money is held in the bank account against any LEA request or court order) are received within 90 calendar days of the grievance being submitted by the bank, then within 15 calendar days before the expiry of these 90 calendar days, the bank will intimate the concerned LEA for removal of the hold, in cases where the hold placed has been contested upon through this

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grievance redressal mechanism. Further, an SMS will be sent to the concerned SHO or the authorised Police Officer through NCRP. If the amount is not required to be retained in any other case or if there is no petition filed in any court for the release of that amount, and there is no request from the concerned LEA for an extension of the hold period, the bank shall remove the hold, after EDD, on a request made by the account holder and as per instructions of the concerned LEA. Before carrying out the discontinuation of the hold, intimation will be sent to the SHO at least 15 calendar days before the date of expiry of the 90 calendar days from the date of raising the grievance. The status of the removal of the hold will be updated on CFCFRMS by the Bank. In case the IOs or designated Police Officers find it necessary during the course of investigation that it's necessary to continue the hold, they may ask for an extension for continuation for up to 90 additional calendar days."

8. The petitioner shall be entitled to approach the bank and take further steps in terms of the SOP.

9. There are multiple liens already marked on the account of the petitioner. Since in terms of the SOP, the petitioner is challenging the said liens, it would be only fair that respondent No. 2 shall not release amounts to the investigating agencies. In case the amounts are released, the petitioner shall suffer irreparable loss and injury as the same will be taken out from the accounts of the petitioner based on transactions which the petitioner is disputing and is a subject matter of the present dispute. The

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balance of convenience also lies in favour of the petitioner as amounts are already in lien and in case the petitioner fails in the challenge, the amount can always be directed to be released, subsequently.

10. For the said reasons, till the grievance of the petitioner is adjudicated in terms of the SOP, the respondent no. 2 shall not release the amounts further to the investigating agency.

11. With these directions, the petition is disposed of.

JASMEET SINGH, J

MARCH 13, 2026/NG

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