



IN THE HIGH COURT OF KARNATAKA AT BENGALURU



DATED THIS THE 8TH DAY OF JULY, 2026

BEFORE

THE HON'BLE MR. JUSTICE SURAJ GOVINDARAJ

WRIT PETITION NO. 20256 OF 2026 (GM-RES)

BETWEEN:

1. NITHIN THIMMAIAH
AGED ABOUT 38 YEARS,
S/O M.N. PEMMAIAH,
VIJAYANAGAR 2ND STAGE,
VIRAJPET TOWN, VIRAJPET, KODAGU,
KARNATAKA - 571218.
2. AIYAPPA M B,
AGED ABOUT 37 YEARS
S/O M N BIDADAPPA
NALVATHOKULE VILLAGE AND POST
VIRAJPET TALUK
KODAGU, KARNATAKA-571236
3. MOHAMMED NAEEMUDDIN
AGED ABOUT 36 YEARS,
C/O MD. NASEERUDDIN
NO. 24, GROUND FLOOR,
2ND CROSS, DHANANJAYA LAYOUT,
KITHAGANUR, KRISHNARAJAPURAM,
BENGALURU NORTH,
BENGALURU, KARNATAKA 560036.
4. BOPAIAH K.J.
AGED ABOUT 37 YEARS,
S/O K.B. JOYAPPA,
NO. 14, CAUVERY COLONY, 2ND CROSS,
SRINIVAGILU EXTENSION,
VIVEKNAGAR, BANGALORE SOUTH,
BENGALURU, KARNATAKA 560047.
5. CHANGAPPA P.S.
AGED ABOUT 35 YEARS
C/O SHAMBU P.K.

Digitally signed
by SHWETHA
RAGHAVENDRA
Location: HIGH
COURT OF
KARNATAKA



PONNAMPET TALUK,
NALKERI VILLAGE, VIRAJPET TALUK,
KODAGU DISTRICT, KARNATAKA – 571217

6. APPACHU S K,
AGED ABOUT 37 YEARS,
S/O LATE KAVERIAPPA,
HATHUR HOBALI, VIRAJAPET TALUK,
K BYGODU, KODAGU,
KARNATAKA 571213
7. PRADEEP MARIA PRAKASH G.
AGED ABOUT 37 YEARS
S/O J. GNANA PRAGASM,
NO. 87, MARIA NILAYA, 1ST A CROSS,
NEAR JACK AND JILL SCHOOL,
GANGAPPA LAYOUT, SHAKTHI NAGAR,
DOORAVANI NAGAR, BENGALURU,
KARNATAKA 560016.

...PETITIONERS

(BY SRI. SOMANNA K P., ADVOCATE)

AND:

1. HOCKEY KARNATAKA
REPRESENTED BY ITS SECRETARY GENERAL,
FIELD MARSHAL K.M. CARIAPPA HOCKEY ARENA,
SHANTHI NAGAR, BENGALURU.
2. KARNATAKA OLYMPICS ASSOCIATION,
REPRESENTED BY ITS SECRETARY GENERAL,
KANTEERAVA STADIUM, SPORTS COMPLEX,
KASTURBA RD, NUNEGUNDLAPALLI,
AMBEDKAR VEEDHI, BENGALURU,
KARNATAKA 560001
3. HOCKEY INDIA,
REPRESENTED BY ITS SECRETARY GENERAL,
B1/E14, MOHAN CO-OP, INDUSTRIAL ESTATE,
MATHURA ROAD, NEW DELHI-110003

...RESPONDENTS

(BY SRI. D.R. RAVISHANKAR., SR. COUNSEL FOR
SRI. DARSHAN.R., ADVOCATE FOR R1;
SRI. UDITH DEDHIYA &
SRI. ADOORYA HARISH., ADVOCATES FOR R3)



THIS WRIT PETITION IS FILED UNDER ARTICLES 226 AND 227 OF THE CONSTITUTION OF INDIA PRAYING TO ISSUE AN APPROPRIATE WRIT, ORDER OR DIRECTION IN THE NATURE OF CERTIORARI QUASHING THE IMPUGNED LETTER DATED 18.06.2026 VIDE ANNEXURE-A ISSUED BY THE 1ST RESPONDENT ONLY ON SO FAR AS THE PETITIONERS ARE CONCERNED AND ETC.

THIS WRIT PETITION, COMING ON FOR PRELIMINARY HEARING, THIS DAY, ORDER WAS MADE THEREIN AS UNDER:

CORAM: HON'BLE MR. JUSTICE SURAJ GOVINDARAJ

ORAL ORDER

1. The petitioners are before this Court seeking for the following reliefs:

- i. *An appropriate writ, order or direction in the nature of certiorari quashing the impugned Letter dated 18.06.2026 vide ANNEXURE-A Issued by the 1st Respondent only on so far as the petitioners are concerned.*
- ii. *An appropriate writ, order or direction in the nature of Mandamus directing the Respondent No.1 to permit the Petitioners to participate in the 10th Hockey Karnataka League Championship 2026 and all consequential selection processes, by treating the Petitioners as eligible to participate, notwithstanding the letter dated 18.06.2026, vide ANNEXURE-A and pass such other or further orders as this Hon'ble Court deems fit in the facts and circumstances of the case, in the interest of justice and equity.*
- iii. *Such other writ or order or direction as this Hon'ble Court may deem fit in the facts and circumstances of the case, including the cost of this writ petition in the interest of justice.*

2. The petitioners are permanent employees of the Accounts and Audit General Office (AGORC),



Bengaluru, and are accomplished hockey players who have represented the organisation in various Inter-Departmental, State and National-level tournaments. Petitioners Nos.1 and 2 are stated to have represented India in several international hockey tournaments, while Petitioners Nos.3 to 7 have represented the State of Karnataka in numerous State and National-level hockey tournaments. The petitioners are aggrieved by the communication dated 18.06.2026 issued by the Secretary General, Hockey Karnataka, addressed to the Sports Welfare Officer, AGORC, Bengaluru, insofar as it states that the petitioners are ineligible to participate in the League Championship proposed to be organised by Hockey Karnataka.

3. The communication dated 18.06.2026 is, in substance, an invitation extended by the Secretary General, Hockey Karnataka, to the Sports Welfare Officer, AGORC, inviting the AGORC team to participate in the League Championship scheduled to be held at the Field Marshal K.M. Cariappa Hockey Arena, Shanthi Nagar, Bengaluru, from 06.07.2026 to 05.08.2026. The communication further indicates that the championship is intended to facilitate the selection of players for the forthcoming 97th All India MCC–Murugappa Gold Cup Hockey Tournament,



2026. However, while extending the invitation, Hockey Karnataka has specifically intimated that the petitioners are not eligible to participate in the said League Championship.

4. It is in the above factual backdrop, and being aggrieved by the declaration of their ineligibility contained in the communication dated 18.06.2026, that the petitioners have approached this Court seeking the reliefs prayed for in the present writ petition.

5. The submission of Sri.Somanna.K.P., learned counsel for the petitioners is that;

5.1. Learned counsel for the petitioners submits that the sole basis for declaring the petitioners ineligible, as reflected in the communication dated 18.06.2026, is the allegation that they had participated in an "unsanctioned tournament" organised by the Karnataka State Hockey Association ("KSHA"), which, according to Hockey Karnataka, is an unrecognised body in the State of Karnataka.

5.2. Learned counsel places reliance upon the Hockey India Regulations Relating to Sanctioned and Unsanctioned Events, published



in August 2019, particularly Clause B (1.1) thereof, which deals with participation in sanctioned and unsanctioned events, which is reproduced hereunder for easy reference;

B. Sanctioned and Unsanctioned Events

1. Prohibition on participating in Unsanctioned Events:

1.1 Organisations or individuals (including Athletes, technical officials, umpires, coaching or management staff) under HOCKEY INDIA jurisdiction may not participate in any manner in any Unsanctioned Event.

1.2 Any Athlete or other individual under HOCKEY INDIA jurisdiction who is found to have participated in an Unsanctioned Event:

1.2.1 is automatically ineligible for twelve months participate in any capacity in any International Event:

a. Such Athlete or other individual may apply to the FIH Disciplinary Commissioner for a waiver of all or part of this period of ineligibility for good cause shown, provided that the circumstances will have to be exceptional to justify such waiver. The FIH Disciplinary Commissioner's decision may be appealed by the Athlete/other individual or the FIH to the Judicial Commission;

b. During the period of ineligibility, the Athlete/other individual may not be selected to participate in any capacity in an International Event, and any selection made despite this prohibition may be declined by the FIH or other event organiser.

1.2.2. may have disciplinary consequences imposed upon him or her under the Hockey India Disputes and Grievance Redressal Committee for such breach of clause B.1.1, including (if seen fit) being ruled ineligible to participate in any capacity



in Sanctioned Events for a period of up to 12 months (first offence) or more (subsequent offences).

1.3 HOCKEY INDIA will recognise and give effect within its own jurisdiction to any restriction, exclusion or ineligibility imposed by another National Association on an organisation or individual under that National Association's jurisdiction for participating in an Unsanctioned Event.

1.4 It is a condition of eligibility for any organisation or individual from another National Association wishing to participate in any Event under HOCKEY INDIA jurisdiction that the organisation or individual in question has not participated in any Unsanctioned Event in the twelve months prior to the Event in question.

5.3. Referring to Clause B(1.1), learned counsel submits that although the said provision prohibits athletes, technical officials, umpires, coaching staff and management personnel falling under the jurisdiction of Hockey India from participating in any unsanctioned event, the provision does not, by itself, prescribe any automatic consequence of disqualification or ineligibility in respect of domestic competitions.

5.4. Inviting the attention of the Court to Clauses 1.2.1 and 1.2.2, learned counsel contends that the scheme of the Regulations clearly distinguishes between ineligibility to participate in international events and domestic events.



Clause 1.2.1 provides for automatic ineligibility for a period of twelve months only in relation to participation in an international event.

5.5. In contrast, Clause 1.2.2 contemplates disciplinary consequences only after proceedings are initiated before the Hockey India Disputes and Grievance Redressal Committee.

5.6. It is, therefore, submitted that the petitioners, merely because they are alleged to have participated in an unsanctioned event, cannot be automatically suspended or declared ineligible to participate in domestic or national tournaments. According to learned counsel, automatic ineligibility is confined to international events under Clause 1.2.1, whereas any restriction in respect of domestic or national events can be imposed only after disciplinary proceedings are initiated and concluded in accordance with Clause 1.2.2.

5.7. In this regard, he relies on the bye-laws of Hockey India, more particularly Article 20 thereof, which is reproduced hereunder for easy of reference;



Article 20: Dispute Resolution Committee

20.1 HI shall constitute a Dispute Resolution Committee in accordance with these bye-laws, rules and regulations framed for the purpose and applicable law.

20.2 The constitution, composition, tenure, powers, functions, operation and procedures of the Dispute Resolution Committee shall be governed by rules shall be chaired by a retired Judge of High Court or eminent personality or and regulations framed by HI and applicable law. Preferably the Committee legal practitioner.

20.3 The Dispute Resolution Committee shall function in a manner consistent with principles of natural justice and fairness, as prescribed in the applicable byelaws.

5.8. Learned counsel next relies upon Article 20 of the Bye-laws of Hockey India dealing with the constitution of the Dispute Resolution Committee. Referring to Articles 20.1 to 20.3, it is submitted that Hockey India is required to constitute a Dispute Resolution Committee whose constitution, powers and procedure are governed by the Bye-laws and applicable regulations, and that such Committee is required to function consistently with the principles of natural justice.

5.9. It is, therefore, contended that any dispute relating to the alleged breach of the Regulations is required to be considered by the Dispute Resolution Committee constituted under Article



20 and cannot be decided unilaterally by Hockey Karnataka.

5.10. Apart from the Dispute Resolution Committee, there is a Grievance Refusal Committee contemplated in Article 22 of Bye-laws of Hockey India. Article 22 is reproduced hereunder for easy reference.

Article 22: Grievance Redressal Committee

22.1 HI shall establish an internal grievance redressal mechanism, including the constitution of a Grievance Redressal Committee, in accordance with these bye-laws and applicable law.

22.2 The Grievance Redressal Committee shall address grievances raised by athletes, coaches and other persons associated with HI in a fair, timely and transparent manner, in accordance with the procedure prescribed under the applicable regulations.

22.3 The composition, tenure, powers, functions, jurisdiction and procedure of the Grievance Redressal Committee shall be governed by rules and regulations framed by HI in accordance with these bye-laws and applicable law. Preferably the Committee shall be chaired by a retired Judge of High Court or eminent personality or legal practitioner.

22.4 The grievance redressal mechanism shall operate without prejudice to any other remedy available under these bye-laws or applicable law.

5.11. By referring to Article 22, his submission is that whenever there is any grievance, the Grievance Committee shall address grievances raised by athletes, coaches and other persons associated with Hockey India in a fair, timely and



transparent manner in accordance to the procedure prescribed under the applicable regulations. The Grievance Redressal Committee in terms of Article 22.2 the word "fair" would include compliance with the principles of natural justice.

5.12. By referring to Article 22.3, he submits that the Grievance Redressal Committee shall have to be chaired by a retired Judge of the High Court or eminent personality or legal practitioner, which would require that the petitioners are heard by the Grievance Redressal Committee before any orders are passed.

5.13. He refers to the Hockey India Code of Ethics and Ethics Committee, which relates to Article 19 of Hockey India bye-laws and submits that even if there is any ethical violation on the part of the petitioners, the same would have to be enquired into by the Ethics Committee and in this regard, he relies on Article 4, which relates to complaints and references. Article 4 is reproduced hereunder for easy reference;

Article 4- Complaints and References

1. Any complaint alleging violation of the Hockey India Code of Ethics or related regulations may be filed before Hockey India in writing, physically or



electronically, in such form and manner as may be prescribed.

2 Every complaint shall contain:

a) the name and particulars of the complainant:

b) particulars of the respondent:

c) material facts and allegations:

d) supporting documents or evidence, where available: and

e) a declaration affirming the correctness of the contents.

3. Anonymous or pseudonymous complaints may be examined where the allegations disclose serious ethical violations or matters affecting the integrity of the sport.

4. The President of Hockey India, the Executive Committee or any competent authority may also refer any matter suo motu to the Ethics Committee for inquiry or consideration.

5. Hockey India may prescribe a reasonable complaint fee, procedural requirements or filing conditions, subject to waiver or exemption in appropriate cases.

5.14. By referring to Article 4, his submission is that if there is any complaint alleging violation of Hockey India Code of Ethics or related regulations, the said complaint would have to be filed before Hockey India in writing, physically or electronically, and the contents of the complaint are as described under Clause (2) thereof.



5.15. The President of Hockey India, the Executive Committee or any Competent Authority may also refer any matter *suo motu* to the Ethics Committee for enquiry or consideration. The procedure on a complaint being received or *suo motu* reference being made is that under Article 5 of the Ethics Committee, which is reproduced hereunder for easy reference;

Article 5 - Procedure and Inquiry

- 1. Upon receipt of a complaint or reference, the Ethics Committee shall undertake a preliminary examination to determine whether a prima facie case exists.*
- 2. If the Committee is satisfied that a prima facie case exists, notice shall be issued to the respondent along with relevant material and documents.*
- 3. The respondent shall ordinarily be granted a period of 2 (two) weeks from receipt of notice to file a written response or explanation. The Committee may extend such period for sufficient cause recorded in writing.*
- 4. The Ethics Committee shall ensure compliance with the principles of natural justice and provide reasonable opportunity of hearing to all concerned parties.*
- 5. During the course of inquiry, the Ethics Committee may:*
 - a) call for records, information, reports or documents;*
 - b) seek written statements or affidavits;*
 - c) summon and hear parties, witnesses or experts;*
 - d) permit representation through legal counsel where considered appropriate;*



e) conduct hearings physically or through video conferencing;

f) appoint Independent experts, investigators or advisors;

g) seek assistance from Hockey India officials or external agencies; and

h) take any other measure necessary for effective adjudication of the matter.

6. Proceedings before the Ethics Committee may be conducted in person, through virtual mode or by circulation of documents, as the Committee may deem appropriate.

7. The Committee may grant interim recommendations or directions where necessary to preserve integrity, fairness, safety, confidentiality or the proper administration of the proceedings.

5.16. By referring to of Article 5, his submission is that to preserve integrity, fairness, safety and confidentiality interim recommendations could be submitted and in terms of Sub-clause (1) of Article 5, on receipt of the complaint, a preliminary examination is required to be conducted and in terms of Clause (2), if the Committee is satisfied that a *prima facie* case exists, notice is to be issued to respondents along with relevant material. In terms of Clause (3), respondents are required to be granted two weeks' time to file a written response or explanation. Thereafter, the Committee, ensuring compliance with the principles of



natural justice and providing reasonable opportunity of hearing to all concerned, could pass such orders, including interim directions.

5.17. His submission is that even if there is a *suo motu* reference which has been made by Hockey Karnataka, there is no enquiry which has been held in terms of Article 5 without an enquiry being held and the principles of natural justice being satisfied, so-called ineligibility arrived at by Hockey Karnataka in respect to the petitioners, is not sustainable and is required to be set aside.

6. Sri.D.R.Ravishankar., learned Senior Counsel appearing for Hockey Karnataka, would submit that:

6.1. The bye-laws of Hockey India have been *mutatis mutandis* adopted by Hockey Karnataka, and all the bye-laws are equally applicable to Hockey Karnataka.

6.2. His submission is that the aspect of discipline is very important for any game and more so for the national game of hockey. There being various issues which had arisen on account of indiscipline, the Hockey India Regulations Relating to Sanctioned and Unsanctioned



Events published in August 2019 had been introduced. This was to ensure that the players participate only in sanctioned events and not in unsanctioned events, and that their schedule is regulated in a proper manner.

6.3. Apart therefrom, he submits that the classification of sanctioned and unsanctioned events is also in the interest of protecting the interests of the players so that they are not used or misused in other unsanctioned events.

6.4. His submission is that an event is being specifically adverted to in Clause 1.14 of Article 1 of the bye laws of Hockey India, which means any match, tournament, competition, league, trial, camp or programme which is organised, recognised, sanctioned or controlled by Hockey India or by any affiliated unit of Hockey India acting in accordance with the bye laws or conducted under aegis of Federation of International Hockey (FIH), Asian Hockey Federation (AHF) and Indian Olympic Association (IOA). Clause 1.14 is reproduced hereunder for easy reference:

1.14 "Event" means any match, tournament, competition, league, trial, camp or programme which is organized, recognised, sanctioned or controlled by



HI, or by any affiliated unit of HI acting in accordance with these bye-laws, or conducted under the aegis of the FIH, AHF or IOA.

- 6.5. His submission is that Hockey Karnataka, being registered in Karnataka, has a Memorandum of Association. The main objective is to affiliate Hockey Karnataka with Hockey India and the Karnataka Olympic Association, and to bring it within the purview of their rules, by-laws, and regulations, and to comply with them and be bound by them. Thus, he submits that there is no option but to incorporate the by-laws of Hockey India into Hockey Karnataka.
- 6.6. By referring to Clause (xvi) of the main objectives of Hockey Karnataka, his submission is that Hockey Karnataka is required to take disciplinary action against District Hockey Organisation/institutions/units indulging in anti-social activities, showing inappropriate acts, indulging in any act, bringing bad name/ignominy, defame to State and to the Hockey game.
- 6.7. His contention is that participation in unsanctioned events would come within the disciplinary powers of Hockey Karnataka.



6.8. By referring to the Rules and Regulations of Hockey Karnataka, more particularly Clause (v) of Rule 1, which defines 'player', he submits that any person participating in any activities or units accepted and controlled by Hockey India or its members would be a 'player'. Clause (v) of Rule 1 of Hockey Karnataka is reproduced hereunder for easy reference:

v. 'Player' its meaning: persons participating in any activities/units accepted and controlled by HOCKEY INDIA/its members.

6.9. Learned Senior Counsel for respondent No.2 submits that the regulatory framework governing the sport of hockey operates at three distinct levels, namely, the District/State level, the National level and the International level. According to him, insofar as domestic tournaments conducted within the country are concerned, Hockey Karnataka is the competent authority to regulate the conduct of players within the State, whereas Hockey India exercises jurisdiction in respect of international events.

6.10. Learned Senior Counsel submits that Hockey Karnataka is vested with the authority to regulate participation in domestic tournaments



conducted within the State and is equally empowered to initiate disciplinary proceedings against players who violate the applicable Rules and Regulations.

6.11. In support of the said contention, learned Senior Counsel places reliance upon Rule 5(1)(vi) of the Rules of Hockey Karnataka to contend that the Association is expressly empowered to impose fines or penalties and to initiate disciplinary action against any person committing a violation of the Act, the Rules or the Bye-laws. It is on the strength of the said power that the impugned action has been taken.

6.12. Learned Senior Counsel further relies upon Rule 5(2)(v) to submit that the Executive Committee is specifically empowered to take decisions relating to indiscipline, misconduct and allied matters and, therefore, the impugned decision falls squarely within its powers.

6.13. Referring to the Hockey India Regulations Relating to Sanctioned and Unsanctioned Events (August, 2019), learned Senior Counsel submits that the expression "Event" has been defined broadly to include any indoor or



outdoor hockey match, tournament, competition or other event at any level, whether international, continental, national or local, including age-group events. A "Sanctioned Event" is one organised or sanctioned by the relevant Continental Federation, National Association or the FIH in accordance with the Regulations, including events organised or sanctioned by Hockey India under Clause B.2 thereof.

6.14. It is his submission that every event which does not satisfy the above definition is necessarily an "Unsanctioned Event". Therefore, if a player participates in a tournament which has not been sanctioned by the competent authority, such participation constitutes a violation of the Regulations, warranting disciplinary action by Hockey Karnataka to maintain discipline and the integrity of the sport.

6.15. Learned Senior Counsel further places reliance upon the communication dated 24.02.2026 issued by Hockey Karnataka, wherein the tournaments recognised and sanctioned by Hockey Karnataka for the relevant season have been specifically enumerated. According to him,



any tournament not included in the said list is necessarily an unsanctioned tournament. Since the KSHA League in which the petitioners admittedly participated does not figure in the said list, the participation of the petitioners therein amounts to participation in an unsanctioned event.

6.16. Learned Senior Counsel fairly submits that no individual notice or show-cause notice was issued to the petitioners before the impugned communication was addressed. However, he contends that a communication was addressed to the Sports Welfare Officer of the Comptroller and Auditor General of India informing the employer that the petitioners had participated in the KSHA B Division, A Division and Super Division League matches representing various private clubs in tournaments which were not sanctioned by Hockey Karnataka and, consequently, they were not eligible to participate in the League Championship organised by Hockey Karnataka.

6.17. Learned Senior Counsel also places reliance upon the newspaper reports produced as Annexure-R11 to contend that there is no



dispute whatsoever regarding the participation of the petitioners in the KSHA tournaments. According to him, once the factual participation in an unsanctioned event is admitted or otherwise indisputable, no further enquiry into the factual aspect is warranted. The only consequence flowing from such admitted participation is the initiation of disciplinary action in terms of the governing Regulations.

6.18. Learned Senior Counsel submits that issuance of a prior notice to the petitioners would have been an empty formality, since there was no factual dispute regarding their participation in the unsanctioned tournaments. According to him, in the absence of any tenable defence available to the petitioners, non-issuance of notice has not caused any prejudice. It is on this basis that Hockey Karnataka declared the petitioners ineligible to participate in the League Championship.

6.19. Learned Senior Counsel therefore submits that, even assuming that there has been some deviation from the principles of natural justice, the same would not vitiate the impugned action, as the present case falls within the well-



recognised "empty formality" exception to the rule of audi alteram partem. Since the participation of the petitioners in the unsanctioned tournaments is undisputed, no useful purpose would have been served by issuing a prior notice or conducting an enquiry. On the aforesaid grounds, he submits that the writ petition is devoid of merit and is liable to be dismissed.

7. Sri.Udith Dedhiya, learned counsel appearing for Hockey India would also support the submission of Sri D.R. Ravishankar, learned Senior counsel.

7.1. He further submits that it is the responsibility of Hockey India to discipline its players in respect of the national and international events. The respective State units would have to maintain discipline in respect of their respective State events.

7.2. He also submits that players cannot participate in unsanctioned events and in that regard he submits that Hockey Karnataka has necessary powers to take action against any indiscipline by any particular player.



8. Heard Sri Somanna K.P., learned counsel for the petitioners, Sri D.R.Ravishankar, learned Senior Counsel for respondent No.1 and Sri Udith Dedhiya, learned counsel for respondent No.3.
9. The rival submissions advanced on behalf of the parties have been noticed in considerable detail for the sake of completeness. However, in the opinion of this Court, it is neither necessary nor appropriate to examine each of those contentions at this stage. The controversy involved in the present writ petition lies within a narrow compass and turns essentially upon the interpretation of the Hockey India Regulations Relating to Sanctioned and Unsanctioned Events, 2019 and the procedure prescribed therein.
10. The principal question that arises for determination by this Court is whether the mere participation of a player in an alleged unsanctioned domestic event automatically renders such player ineligible or disqualified from participating in domestic tournaments, or whether such ineligibility can be imposed only after following the disciplinary procedure contemplated under the governing Regulations.
11. The answer to the aforesaid question is found in Clause B of the Hockey India Regulations Relating to



Sanctioned and Unsanctioned Events, published in August, 2019. Clause B(1.2.1) provides that an athlete or other individual under the jurisdiction of Hockey India who is found to have participated in an unsanctioned event shall be automatically ineligible for a period of twelve months to participate in any capacity in any International Event. The language employed in the provision is plain, unambiguous and admits of only one interpretation. The consequence of automatic ineligibility is expressly confined to participation in international events. The Regulation does not provide that such automatic ineligibility extends to domestic, State, District or National-level tournaments. The Regulations contemplate automatic disqualification, restricted to international events. It is a settled principle of interpretation that where the language of a provision is clear, the Court cannot enlarge its scope by reading into it words which the rule-making authority has consciously omitted.

12. The scheme of the Regulations further fortifies the above interpretation. Clause B(1.2.2) specifically deals with disciplinary consequences arising out of participation in an unsanctioned event and provides that an athlete may have disciplinary consequences imposed upon him or her by the Hockey India Disputes and Grievance Redressal Committee for



breach of Clause B(1.1), including, where considered appropriate, being declared ineligible to participate in sanctioned events for the prescribed period. The use of the expression "may" and the specific reference to the competent Disputes and Grievance Redressal Committee clearly indicate that, insofar as domestic events are concerned, ineligibility is not automatic but is dependent upon an adjudicatory process undertaken by the competent authority. Thus, the Regulations themselves make a conscious distinction between international events, where the consequence follows automatically by operation of Clause B(1.2.1), and domestic events, where disciplinary action is contingent upon an enquiry contemplated under Clause B(1.2.2).

13. The Bye-laws and the Code governing the functioning of the Disputes and Grievance Redressal Committee, as extracted hereinabove, prescribe a comprehensive procedure to be followed before any disciplinary consequence is imposed. Upon receipt of a complaint or upon a suo motu reference, the competent Committee is required to undertake a preliminary examination to determine whether a prima facie case exists. If satisfied that a prima facie case is made out, notice is required to be issued to the concerned athlete together with the relevant material and



documents relied upon. The athlete is required to be afforded adequate time to submit a written explanation, following which the Committee is obliged to consider the matter after complying with the principles of natural justice and pass an appropriate reasoned order. Such a structured procedure is not an "empty formality". It constitutes the very foundation of the disciplinary mechanism envisaged under the Regulations.

14. In the present case, admittedly, no proceedings have been initiated before the competent Disputes and Grievance Redressal Committee. There is nothing placed on record to indicate that any complaint has been lodged before the Committee or that any suo motu reference has been made by the competent authority. There is equally no material to demonstrate that a preliminary examination has been undertaken, notice has been issued to the petitioners, an opportunity has been afforded to them to submit their explanation or that the competent Committee has rendered any finding regarding the alleged violation. In the absence of any such adjudication, the declaration made by the Secretary General of Hockey Karnataka that the petitioners are ineligible to participate in the League



Championship is dehors the procedure prescribed under the governing Regulations.

15. The submission urged on behalf of the respondents that no enquiry was necessary since the petitioners do not dispute their participation in the KSHA tournament also cannot be accepted. The disciplinary process contemplated under the Regulations is not intended merely to ascertain the factum of participation. The enquiry may extend to several aspects including whether the tournament in question answers the definition of an "unsanctioned event", whether the concerned players were in fact subject to the jurisdiction of the Regulations in the manner alleged, whether there existed any justification, exemption or mitigating circumstance, whether the alleged violation attracts disciplinary consequences, and if so, the nature and extent of such consequences. These are matters which the Regulations entrust to the specialised disciplinary forum constituted under the Bye-laws. Merely because one factual circumstance may not be disputed does not render the entire adjudicatory process redundant.
16. The further contention that issuance of notice would have been an empty formality is equally devoid of



merit. The "empty formality" theory constitutes a narrow exception to the rule of audi alteram partem and cannot be invoked to dispense with a statutory or regulatory procedure which expressly requires adjudication by a designated authority. Where the governing Regulations themselves prescribe the authority competent to determine the existence of a violation and the procedure to be followed before imposing disciplinary consequences, such procedure cannot be bypassed on the assumption that the outcome is a foregone conclusion. Acceptance of such a contention would amount to permitting an authority to substitute its subjective satisfaction for the adjudicatory mechanism consciously created by the rule-making authority, a course which is impermissible in law.

17. This Court is therefore of the considered opinion that the impugned communication dated 18.06.2026 proceeds on an assumption that participation in an alleged unsanctioned domestic event automatically results in ineligibility. Such an assumption is contrary to the plain language of Clause B of the 2019 Regulations. While automatic ineligibility is expressly provided only in relation to international events under Clause B(1.2.1), any disciplinary consequence affecting participation in domestic or national



tournaments can be imposed only after the procedure contemplated under Clause B(1.2.2) has been duly followed by the competent Disputes and Grievance Redressal Committee.

18. Whether the petitioners have, in fact, violated the Regulations, whether the KSHA tournament was an unsanctioned event within the meaning of the Regulations, whether Hockey Karnataka possesses the authority claimed by it, and whether any disciplinary consequence ultimately deserves to be imposed are all questions which this Court intentionally refrains from adjudicating. Those questions fall within the domain of the competent disciplinary authority and must first be considered by it in accordance with the procedure prescribed under the Regulations. Any opinion expressed by this Court on those issues at this stage would amount to prejudging matters which are yet to be examined by the authority vested with the jurisdiction to do so.
19. In the above circumstances, this Court is satisfied that the impugned communication dated 18.06.2026 cannot be sustained, not because this Court has expressed any opinion on the merits of the allegations against the petitioners, but because the declaration of ineligibility has been made by



bypassing the mandatory disciplinary mechanism prescribed under the governing Regulations and in violation of the principles of natural justice embedded therein. It is always open to the competent Disputes and Grievance Redressal Committee to initiate appropriate proceedings, if so advised, and to take a decision in accordance with law after affording the petitioners a reasonable opportunity of being heard. All rival contentions on merits are accordingly left open.

20. As such this Court passes the following:

ORDER

- i) Writ petition is ***partly allowed.***
- ii) A mandamus is issued directing respondent No.1 to permit the petitioners to participate in the 10th Hockey Karnataka League Championship 2026.
- iii) Liberty is reserved to respondent No.1 to initiate such disciplinary proceedings as may be permissible under the relevant rules and regulations.



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- iv) The respondents shall act on the printout of the operative portion of the order without insisting on the entire order.

Sd/-
(SURAJ GOVINDARAJ)
JUDGE

SR/KTY
List No.: 1 Sl No.: 28