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IN THE HIGH COURT OF DELHI AT NEW DELHI

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Judgment reserved on: 18.11.2025

Judgment pronounced on: 23.12.2025

Judgment uploaded on: 23.12.2025

+ LPA 135/2025, CM APPL. 11108/2025, CM APPL. 11109/2025, CM APPL. 11112/2025, CM APPL. 40983/2025, CM APPL. 40984/2025, CM APPL. 58154/2025, CM APPL. 68006/2025, CM APPL. 71568/2025 & CM APPL. 72102/2025
CHANDIGARH HORSE RIDERS SOCIETY CHANDIGARH

.....Appellant

Through: Mr. Amit Sibal and Mr. Vivek Chib, Sr. Advs. along with Mr. T. Singhdev, Mr. Bhanu Gulati, Mr. Pratham Mehrotra, Mr. Tanishq Srivastava, Mr. Abhijit Chakravarty, Ms. Yamini Singh, Ms. Anum Hussain, Ms. Ramanpreet Kaur, Mr. Sourabh Kumar, Mr. Vedant Sood, Mr. Siddharth Sunil and Mr. Zeeshan Thomas, Advs.

versus

RAJASTHAN EQUESTRIAN ASSOCIATION & ORS.

.....Respondents

Through: Mr. Rajiv Dutta, Sr. Adv. along with Mr. Ashish Kothari, Mr. Pratha Pant and Mr. Pratyush Singh, Advocates for R-1. Mr. Sudhir Nandrajog, Sr. Adv. with Mr. Vinayak Bhandari, Mr. Ishaan Phukan, Ms. Ankita Singh, Mr. Asjad Hussain and Mr. Anunay Chowdhary, Advocates for R-3/EFI. Mr. Arti Bansal CGSC along with Mr. Rudra Paliwal, GP. Mr. Ishan Roy Chowdhury and

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Mr. Samar Bansal, Advocates
for Observer.
Mr. Satyajit Sarna and Mr.
Aman Goyal, Advocates for
applicant/intervenor.

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CM APPL. 57473/2025, CM APPL. 57474/2025, CM APPL.
68007/2025, CM APPL. 71567/2025 & CM APPL.
72101/2025 (For

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Mr. Pratham Mehrotra, Mr.
Tanishq Srivastava, Mr. Abhijit
Chakravarty, Ms. Yamini
Singh, Ms. Anum Hussain, Ms.
Ramanpreet Kaur, Mr. Sourabh
Kumar, Mr. Vedant Sood, Mr.
Siddharth Sunil and Mr.
Zeeshan Thomas, Advs.

versus

EQUESTRIAN FEDERATION OF INDIA & ORS.

.....Respondents

Through: Mr. Sudhir Nandrajog, Sr. Adv.
with Mr. Vinayak Bhandari,
Mr. Ishaan Phukan, Ms. Ankita
Singh, Mr. Asjad Hussain and
Mr. Anunay Chowdhary,
Advocates for R-1/EFI

Mr. Rajiv Dutta, Sr. Adv. along
with Mr. Ashish Kothari, Mr.
Pratha Pant and Mr. Pratyush

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Mr. Ishan Roy Chowdhury and
Mr. Samar Bansal, Advocates
for Observer.
Mr. Satyajit Sarna and Mr.
Aman Goyal, Advocates for
applicant/intervenor.

CORAM:
HON'BLE MR. JUSTICE ANIL KSHETARPAL
HON'BLE MR. JUSTICE HARISH VAIDYANATHAN
SHANKAR

J U D G M E N T

ANIL KSHETARPAL, J.

1. Through the present Letters Patent Appeals, the Appellant assails the correctness of the Judgment dated 07.01.2025 and Order dated 13.08.2025 [hereinafter referred to as “**Impugned Judgment/Order**”] passed by the learned Single Judge in W.P. (C) Nos.5989/2022 and 10342/2019, respectively.

2. *Vide* Impugned Judgment dated 07.01.2025, the learned Single Judge has *inter alia* held that the Relaxation Clause under the National Sports Development Code of India, 2011 [hereinafter referred to as “**Sports Code**”] is neither arbitrary nor unreasonable. The Court further held that the exemptions granted to the Equestrian Federation of India [hereinafter referred to as “**EFI**”] by the Ministry of Youth Affairs & Sports, Department of Sports, Government of India [hereinafter referred to as “**MYAS**”] are arbitrary and lack any substantive factual foundation. The Court also directed the appointment of a five-member Fact Finding Committee [hereinafter referred to as “**the Committee**”].

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3. Further, *vide* Impugned Order dated 13.08.2025, learned Single Judge stayed the notice bearing No.072/EFI/EOGA/2025 dated 02.08.2025, purported to convene the Extra-Ordinary General Meeting [hereinafter referred to as “**EOGM**”] on 17.08.2025 and directed that the Appellant is restrained from holding the said EOGM.

4. In these circumstances, the question that arises for determination is whether the exemptions granted to the EFI are in conformity with the principles and objectives underlying the Sports Code, and whether the learned Single Judge was justified in staying the convening of the EOGM.

5. With the consent of learned Senior counsel for the parties, both Appeals are heard together and are being disposed of by this common order.

6. In order to contextualize the present dispute, it is important to first chart out the description of the parties and the broad facts.

DESCRIPTION OF THE PARTIES:

7. The Appellant in both the Appeals is alleged to be a member of the EFI (which is disputed by the learned Counsel representing the EFI), arrayed as Respondent No.3 in LPA No.135/2025 and Respondent No.1 in LPA No.578/2025. The Appellant is also one of the requisitionists for convening the EOGM dated 17.08.2025.

8. The EFI, constituted in 1967, is the recognized National Sports Federation [hereinafter referred to as “**NSF**”] entrusted with the management and coordination of the sport of Equestrian in India.

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MYAS is arrayed as Respondent No.2 in both the appeals. The Sports Authority of India [hereinafter referred to as “SAI”] and the Indian Olympic Association are arrayed as Respondent No.3 and Respondent No.4 in LPA No.578/2025, respectively. The Rajasthan Equestrian Association [hereinafter referred to as “REA”], arrayed as Respondent No.1 in LPA No.135/2025 and Respondent No.5 in LPA No.578/2025, is the Petitioner in W.P.(C) No.10342/2019 and the Applicant in CM Appl. No.49192/2025, which stands allowed by the Impugned Order dated 13.08.2025. Mr. S.Y. Qureshi, arrayed as Respondent No.4 in LPA No.135/2025 and Respondent No.6 in LPA No.578/2025, is the Observer appointed by the learned Single Judge *vide* order dated 15.11.2019 in W.P.(C) No.10342/2019.

BRIEF FACTUAL MATRIX:

9. The MYAS, *vide* letter dated 04.08.2017, granted the EFI two years’ time to comply with the Sports Code. The EFI thereafter sought reconsideration of the requirement of compliance on account of the peculiar nature of the sport. On 15.07.2019, the EFI requested the MYAS to exempt it from such compliance, stating *inter alia* that:

- i. the sport has a peculiar nature;
- ii. the pyramidal structure requiring at least 50% District Associations [hereinafter referred to as “DAs”] at the grassroots level is unfeasible;
- iii. the sport requires substantial infrastructure, land availability, and year-round maintenance of equines; and

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iv. the State Associations [hereinafter referred to as “SAs”] and Union Territory Associations [hereinafter referred to as “UTAs”] do not possess the requisite capacity to conduct Equestrian activities.

10. In furtherance of the above, the REA filed W.P.(C) No.10342/2019 seeking, withdrawal of the recognition granted to the EFI as the NSF for the Equestrian Sport on account of its non-compliance with the Sports Code and for replacement of the then Executive Committee [hereinafter referred to as “EC”] with an *ad-hoc* committee to ensure compliance.

11. Thereafter, MYAS issued Notification/Communication No. 12-2/2021-SP-III by which the Sports Code was amended to incorporate a Relaxation Clause, empowering the Minister-in-charge, MYAS, to relax any provision of the Sports Code wherever considered necessary for the promotion of a sport or sportsperson, or for removing difficulties in giving true effect to the provisions of the Sports Code.

12. Thereafter, *vide* letter dated 09.11.2021, the MYAS granted temporary exemptions to the EFI from complying with the requirement of having affiliation to SAs / UTAs in 2/3rd States and their representative requirements in elections as per the Sports Code, noting special requirements of the Equestrian sport. Pertinently, the exemptions were granted only till such time the requisites of SAs/ UTAs in 2/3rd of States and UTs with 50% DAs come into existence.

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13. It is also pertinent that during the period from March 2022 to April 2022, similar exemptions were granted by the MYAS to other sporting associations, including the Indian Golf Union, Indian Polo Association, Rowing Federation of India, Squash Rackets Federation of India, and the Yachting Association of India.

14. The REA thereafter filed W.P.(C) No.5989/2022, seeking, *inter alia*, quashing of the MYAS decision dated 09.11.2021 granting relaxation to the EFI from key provisions of the Sports Code, as well as quashing of Notification No.12-2/2021-SP-III dated 01.02.2021 incorporating the Relaxation Clause into the Sports Code.

15. On 09.06.2023, the EFI issued a notice to conduct its Annual General Meeting [hereinafter referred to as “AGM”], which the REA challenged seeking restraint, however, this Court permitted the said AGM *vide* Order dated 07.07.2023, subject to directions. Thereafter, on 26.08.2023, the EFI issued a notice convening an EOGM based on requisitions from its members, which the REA again challenged. *Vide* Order dated 15.09.2023, this Court allowed the EOGM to proceed and appointed Hon’ble Mr. Justice Najmi Waziri (Retd.) to chair it.

16. This Court, *vide* Order dated 21.05.2024 in W.P.(C) No.10342/2019, having considered the issue pertaining to the aforesaid EOGM, arrived at a finding that, concededly there was no unanimous decision of the house in the EOGM to extend the office bearers elected in 2019 and thus, EFI is functioning without a legitimate official body. The Court then proceeded to appoint an *ad-hoc* Committee to supervise the administration of EFI.

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17. The Appellant and the EFI preferred LPA Nos.449/2024 and 453/2024, respectively, before this Court, seeking the setting aside of the Order dated 21.05.2024. This Court, *vide* Judgment dated 29.05.2024, modified the Order dated 21.05.2024 and reinstated the EC constituted pursuant to the elections held in December 2019.

18. It is stated that following the resignation of Lt. Gen. Gopal R., the President of the Reinstated EC, on 05.08.2024, the 62nd AGM nominated Col. Jagat Singh as President on 17.08.2024. However, on 18.08.2024, Mr. H.S. Khokkar was nominated as President of the EFI.

19. Thereafter, the learned Single Judge *vide* Impugned Judgment dated 07.01.2025, disposed of W.P.(C) No.5989/2022, thereby directing the following:

- i. The Relaxation Clause is neither arbitrary nor unreasonable;
- ii. The exemptions granted to the EFI are arbitrary and lack a substantive factual foundation;
- iii. Appointed a Committee to conduct a detailed investigation into the ground-level realities of the Equestrian Sport in India and furnish a report to that effect within 3 months; and
- iv. Pending the report of the Committee and review by the MYAS, the exemptions granted to EFI shall remain operational.

20. Aggrieved by the aforesaid Judgment, the Appellant on 06.02.2025 preferred LPA No.135/2025 against the same.

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21. Further, on 26.05.2025, the REA preferred C.M. No.35446/2025 in disposed of W.P.(C) No.5989/2022, seeking extension of time on behalf of the Committee to prepare the comprehensive and efficacious report as directed by this Court.

22. It is alleged by the Appellant that pursuant to the Observer's report dated 17.07.2025, several members of the EFI submitted requisitions to Col. Jaiveer Singh seeking an EOGM, with the Appellant's requisition dated 01.08.2025. It is further alleged that upon obtaining the Observer's consent to attend the meeting, Col. Jaiveer Singh accordingly issued a Notice dated 02.08.2025, convening the EOGM for 17.08.2025.

23. Thereafter, on 06.08.2025, the REA preferred CM No.49192/2025 in W.P.(C) No.10342/2019 seeking suspension of the EOGM Notice dated 02.08.2025. By the Impugned Order dated 13.08.2025, the learned Single Judge stayed the operation of the said EOGM Notice. Aggrieved thereby, the Appellant has preferred LPA No.578/2025.

CONTENTION OF THE PARTIES in LPA NO.135/2025:

24. Heard learned Senior Counsel for the parties at length and, with their able assistance, perused the paper book. Learned Senior Counsel have also filed their written submissions, which are on record.

25. Learned Senior Counsel for the Appellant has submitted that:

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i. the learned Single Judge exceeded the limits of judicial review by interfering with a purely executive policy decision. The Courts may interfere only when such decisions are shown to be *mala fide*, arbitrary, or unreasonable. Reliance is placed upon *Peerless General Finance and Investment Co Ltd. & Anr. v. Reserve Bank of India*¹; *Jacob Puliyel v. Union of India & Ors.*²; *Directorate of Film Festivals v. Gaurav Ashwin Jain*³; and *Parminder Singh v. Union of India*⁴.

ii. similar exemptions were also extended by the MYAS to other sports as well, for similar reasons.

iii. the Sports Code cannot be read in the manner of a statute. Reliance is placed upon the judgment of the Supreme Court in *All India Football Federation v. Rahul Mehra & Ors.*⁵.

iv the MYAS, in its Letter dated 09.11.2021, has recorded clear reasons for invoking the *Relaxation Clause*. Equestrian is a unique club-based sport requiring two athletes, specialised infrastructure, and quarantine facilities. It has a limited district-level presence.

v. the insistence on strict compliance with the Sports Code would enable the creation of shell DAs, thereby diverting governance away from the stakeholders who truly represent the sport.

¹ (1992) 2 SCC 343

² 2022 SCC OnLine SC 533

³ (2007) 4 SCC 737

⁴ (2023) 1 SCC (Del) 595

⁵ Special Leave to Appeal (C) Nps.30748-30749/2017



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vi. the re-instated EC and the Committee have been reduced to instruments in the hands of the REA to obstruct and delay the regular functioning of the EFI.

26. *Per contra*, learned Senior Counsel for the Respondent No.1 has submitted that:

i. the issues raised in the W.P.(C) 5989/2022 did not concern the Appellant and were confined solely to examining the legality and validity of the exemptions granted by the MYAS to the EFI and the insertion of the *Relaxation Clause* in the Sports Code.

ii. the Appellant has made a false claim that it is an existing member of the EFI.

iii. Clauses 3.9 and 3.10 of the Sports Code expressly stipulate that the right to vote shall vest exclusively in the SAs and UTAs that are members of the concerned NSF.

iv. the role of clubs has been duly considered, as evidenced by the direction to the Committee to assess their contributions to the sport's governance, and to examine their alignment with the representative framework of the Sports Code.

v. The Appeal is not maintainable as the EFI, being the Appellant's parent body, has been exclusively entrusted with the administration of the sport in India.



vi. The Appellant is obstructing the reform process by challenging the fact-finding exercise. Its conduct in filing this frivolous LPA instead of assisting the committee reflects clear *mala fides*.

vii. the inquiry ordered by the learned Single Judge must be completed to ensure transparency, inclusivity, and fairness in the administration of Equestrian Sport.

27. Learned Senior Counsel for the parties have not made any other submissions.

CONTENTION OF THE PARTIES in LPA NO.578/2025:

28. Learned Senior Counsel for the Appellant has submitted that:

i. the stay on convening the EOGM runs contrary to fundamental principles of democratic governance. Reliance is placed upon the judgments rendered in *Delhi Lawn Tennis Association v. Shyam Minotra*⁶; *Dr. Srinivasa Rao Kothapalli v. Dr. Appa Rao Mukkamala*⁷.

ii. the learned Single Judge overlooked the clear mandate in Article 12(2) of the EFI Statute requiring an EOGM to be convened within 21 days and erred in relying on Article 12(3) to impose a 30-day notice period.

iii. the learned Single Judge wrongly relied on the ongoing fact-finding exercise, ignoring that the Impugned Order

⁶ 1991 SCC OnLine Del 291

⁷ 2013 SCC OnLine AP 403



Judgment 07.01.2025 effectively maintained a status quo regarding the General Body's membership, powers, and composition to ensure that EFI's day-to-day functioning was not disrupted.

iv. the learned Single Judge erred in finding a controversy regarding the Secretary General's powers, disregarding the Observer's authority to summon the Governing Body and exercise of that power upon learning of the EC's decision to suspend the Secretary General.

29. *Per contra*, learned Senior Counsel for the Respondent No.5 has submitted that:

i. the EOGM was called upon by Col. Jaiveer Singh, who was admittedly suspended at the relevant time.

ii. An EOGM can be called upon after satisfying the conditions specified in Article 12 of the EFI Statute. Further, since the conduct of the EOGM has to be the same as that of an ordinary AGM. Thus, the Secretary General must place the requisitions received by him before the EC for discussion and deliberation.

iii. the conduct and the circumstances clearly show the collusion between Col. Jaiveer Singh and the alleged clubs that sent requisitions.

30. Learned Senior Counsel for the parties have not made any other submissions.



ANALYSIS AND FINDINGS:

I. In LPA No.135/2025

31. At the very outset, it is pertinent to note that W.P.(C) No.5989/2022 was instituted by the REA, against the Union of India and the EFI, with Dr. S.Y. Quraishi, the learned Observer appointed by this Court to oversee the functioning of the EFI, being arrayed as a *proforma* party. The issues raised in the said writ petition were confined solely to examining the legality and validity of the exemptions granted by the MYAS to the EFI and the insertion of the Relaxation Clause in the Sports Code, and *prima facie*, had no concern with the Appellant.

32. It is also pertinent to note that EFI is the parent body of the Appellant and is exclusively entrusted with the administration of Equestrian sports in India. Significantly, the EFI, against whom the Impugned Order dated 01.07.2025 has been passed, has itself welcomed the judgment.

33. However, the Appellant seeks to justify the filing of the present LPAs on the ground that, as a member of the EFI, he is entitled to question any decision which, according to him, may have a bearing on the functioning of the EFI or the development of the sport.

34. At the outset, it is necessary to observe that the very status of the Appellant's membership in the EFI has remained shrouded in doubt. Learned counsel representing EFI has stated that the Appellant was never inducted as a member of the EFI. In view thereof, the



foremost question that arises for consideration is whether the Appellant was a subsisting member of the EFI at the relevant time to maintain the present proceedings. The learned Senior Counsel appearing for the Respondent No.1 has submitted that the Appellant is not a member of the EFI and has wrongly projected himself as such.

35. In the backdrop of the above contention, the admitted factual position assumes significance. The record reveals that the Appellant's membership was initially approved by the EC of the EFI on 04.09.2004. However, it is also an admitted fact that in the 58th AGM held on 29.09.2019, the Appellant's membership came to be suspended on account of non-payment of subscription dues. Thereafter, on 23.09.2020, the Appellant applied to the EFI for restoration of its membership with an undertaking to fulfil dues within a week. The copy of the application dated 23.09.2020 is on record. These documents have not been disputed by the Respondents.

36. It is the case of the learned Senior Counsel for the Appellant that, on the perusal of the Minutes of Meeting dated 30.06.2021, it becomes evident that the Appellant was included in the list of the new members. It is further contended by the learned Senior Counsel that, on 27.03.2022, the General Assembly approved the membership of the Appellant in the 60th AGM, and it has consistently been paying subscription dues and the receipts of the same are on record.

37. On the contrary, learned Senior Counsel for the Respondent No.1 has contended that the documents relied upon by the Appellant are fudged, and it is evident from the fact that the name of the REA is



missing from the list of new members. Additionally, the case for the reinstatement of the Appellant was put before the AGM in the 61st AGM held on 09.06.2023. However, by an Order dated 07.07.2023 passed by a learned Single Judge of this Court in W.P.(C) No.10342/2019, the agenda regarding the grant of new memberships was not discussed and no memberships were granted.

38. In light of the rival submissions, this Court finds that the question of the Appellant's subsisting membership is not free from doubt. The matter gives rise to seriously disputed questions of fact, and it is well settled that a writ court ordinarily does not undertake an adjudication of such factual disputes.

39. In view thereof, this Court is of the opinion that the Appellant has demonstrated *sufficient prima facie locus* to maintain the present appeal. The long-standing association of the Appellant with the EFI, the nature of the suspension order, the steps undertaken towards restoration, and the absence of substantive proof impeaching the documents produced by the Appellant collectively justify the matter being examined on its merits. Accordingly, the objection to maintainability is rejected at this stage, and this Court will now continue to examine the matter on the merits.

40. At this juncture, it is pertinent to mention that, on analysis of the facts, the learned Single Judge has returned the following findings:

- i. Sports Code is a comprehensive set of guidelines issued by the Central Government to regulate and promote the



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development of sports, athletes and sports associations, which envisages a pyramidal structure of the recognised state sports federations. It is provided that there will be one NSF. Then there will be SAs, and thereafter DAs. Each SA will have one vote in the NSF.

ii. Over the years, the EFI has granted direct membership to several individuals, clubs, and units of the Indian Army, including dog units, supply depots, mechanised transport battalions, etc. Such inclusion appears to have been undertaken with a view to maintaining majority voting strength and effective control of the EFI. A substantial portion of the EFI's membership comprises officers or clubs affiliated with the Indian Army.

iii. Pursuant to the exemption granted *vide* notification dated 01.02.2021, the MYAS, by its letter dated 09.11.2021, extended certain exemptions to the EFI, which largely relate to the formulation of the electoral college for its elections.

iv. During the pendency of W.P.(C) 10342/2019, the appointed Observer submitted a report noting that clubs affiliated with various Indian Army Corps were exercising effective control over the EFI, without making any commensurate contribution towards the development and promotion of the sport.

v. Although 29 SAs/UTAs exist, the EFI, with a view to retaining and consolidating control, revoked the membership of



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several SAs, thereby consolidating control with the various units of the Indian Army.

41. After recording the aforesaid findings in the Impugned Judgment dated 07.01.2025, the order dated 09.11.2021 was quashed, being contrary to the vision of the Sports Code, which envisages a pyramidal structure of recognised SAs.

42. Now, *firstly*, it is a settled position that the administration of all sports and sports federations is governed by the Sports Code, hence, it is apposite to refer to Clauses 3.9 and 3.10 of Annexure II of the Sports Code. Upon a careful reading of the said provisions, it becomes abundantly clear that Clauses 3.9 and 3.10 of Annexure II to the Sports Code expressly reserve the right to cast a vote exclusively in favour of the SAs and UTAs that are recognised as members of the concerned NSF. The scheme embodied in the Sports Code thus delineates, in unequivocal terms, the category of entities that are empowered to participate in the decision-making process of an NSF.

43. In light of this explicit framework, it necessarily follows that a club does not possess any statutory or legal entitlement to interfere with, participate in, or seek to influence the governance and administration of the sport at the national level. The regulatory intent of the Sports Code is to ensure that the collective voice of the recognised SAs and UTAs, being representative bodies with defined responsibilities, is not diluted or undermined by entities that do not form part of the mandatory governance structure of an NSF.



44. Viewed in this context, the claims sought to be raised by the Appellant appear to be wholly misplaced. The Appellant, being associated merely as a club member, does not fall within the class of entities to whom the Sports Code accords participatory rights in the governance of an NSF.

45. Further, the reliance placed by the learned Senior Counsel for the Appellant on *All India Football Federation (supra)* is misplaced, as the observations therein regarding a holistic reading of the Sports Code and the participation of real stakeholders were made in a context where the concerned entities formed part of the recognised governance framework and were directly affected by the regulatory scheme. In contrast, the Appellant in the present case, being merely a club member, does not fall within the category of stakeholders to whom the Sports Code accords any participatory or voting rights, which are expressly reserved for SAs and UTAs under Clauses 3.9 and 3.10 of Annexure II of the Sports Code. Therefore, the principle relied upon cannot be extended to a situation where the governing statute itself excludes clubs from the decision-making structure, rendering the cited decision inapplicable to the facts at hand.

46. It is also pertinent to note in the abovementioned context, the role of clubs in the development of the sport was given due consideration by the learned Single Judge by entrusting the Committee to evaluate the contributions made by clubs to the governance, infrastructure, and development of Equestrian sports and their compatibility with the representative framework of the Sports Code.



47. Further, the contention of the learned Senior Counsel for the Appellant that the learned Single Judge has exceeded the scope of judicial review by examining the merits of the policy decision of the MYAS is wholly untenable. The record clearly reflects that the learned Single Judge did not embark upon an adjudication of the policy itself, but confined his scrutiny to assessing whether the process leading to the grant of exemptions to the EFI conformed to the requirements of fairness, transparency, and adherence to the governing framework of the Sports Code.

48. The learned Senior Counsel for the Appellant has further placed reliance upon the judgment rendered in *Peerless General Finance and Investment Co Ltd.* (*supra*); *Jacob Puliyl* (*supra*); *Directorate of Film Festivals* (*supra*); and *Parminder Singh* (*supra*). Upon a careful perusal of the said authorities, this Court notes that they merely reiterate the well-settled principle that policy decisions are amenable to judicial review only when they are shown to be contrary to statutory or constitutional provisions, or when they suffer from arbitrariness, irrationality, or an abuse of power.

49. Further, the Appellant submitted that Equestrian sport is distinct in nature due to its dual-athlete structure, gender-neutral format, and that it is highly capital-intensive, requiring specialised expertise and significant recurring expenditure; and that, owing to inadequate infrastructure such quarantine facilities across States, the formation of compliant SAs and DAs is impracticable, rendering the sport inherently club-based, akin to yachting and polo.



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50. This Court has considered these submissions and is of the view that the learned Single Judge has rightly held that these submissions have no merit. While the capital-intensive nature of the sport and the lack of equine infrastructure are not disputed, these factors bear no nexus to the limited exemptions granted, which pertain solely to the composition of the Electoral College and are matters of governance, not of sporting peculiarities. The assertion that horses constitute “athletes” stands negated by the Sports Code, which classifies horses as equipment.

51. The justifications advanced fail to address the central question—whether the exemptions conform to the principles of transparency, accountability, and representation embedded in the Sports Code. Although each sport has its own particularities, such differences do not warrant dilution of the uniform governance standards mandated by the Sports Code.

52. Further, this Court is also of the considered view that the fact-finding exercise must be carried to its logical culmination, as it forms an indispensable safeguard for ensuring transparency and fairness in the governance of Equestrian sport.

II. In LPA No.578/2025

53. At the very outset, it is clear that the provisions of Article 12 of the EFI Statute delineate the circumstances and procedure for convening an EOGM. Article 12(2) further stipulates that the power to convene such a meeting vests in the EC, either when it deems fit, or

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upon a requisition submitted by fifty members of the EFI. In the case of a requisitioned meeting, the EC is mandated to fix the meeting within twenty-one days from the date of receipt of such requisition, which must expressly state the object of the meeting, and the deliberations therein are confined strictly to the business so specified. The requisition is required to be addressed to the Secretary General, who alone is empowered to call the meeting, and this right is expressly excluded in relation to individual and life members. Pertinently, Article 12(3) also clarifies that the procedural conduct of an EOGM shall mirror that of an Ordinary General Assembly, save for the requirement of a minimum quorum of fifty members, excluding the Executive Committee, for its valid convening.

54. Therefore, it becomes evident that for holding an EOGM, Articles 10 and 11 of the EFI Statute must be complied with. Article 10 of the EFI statute mandates that the Secretary General must place the agendas/requisitions received by him before the EC for discussion and deliberation. Further, in terms of Article 11(2), an AGM is required to be convened only after issuance of a written notice of not less than thirty days, clearly specifying the date, place, time, and agenda of the proposed meeting. It further mandates that such notice must be dispatched to all members under postal certificate.

55. The Impugned Order dated 13.08.2025 records the finding of the learned Single Judge that the learned counsel appearing for the Observer conceded that no proactive steps were undertaken by the Observer for convening the EOGM. Upon examining the EOGM Notice dated 02.08.2025, it is revealed that the notice was issued by



Col. Jaiveer Singh, who, on the admitted position of facts, stood suspended on the date of its issuance. The material on record demonstrates that Col. Jaiveer Singh himself instituted CS No. 519/2025 before the Patiala House Courts on 13.10.2025 challenging his suspension, thereby reaffirming the subsistence of such suspension. The record further indicates that the EC, *vide* communication dated 11.04.2025, had suspended him for a period of eighty-nine days or until the conclusion of the investigation, whichever was earlier. Additionally, the Minutes of Meeting dated 21.08.2025 reveal that the EC extended the suspension of Col. Jaiveer Singh from the office of the Secretary General. Thus, it stands established that, on the date on which the EOGM Notice was issued, Col. Jaiveer Singh continued to remain under suspension and was consequently incompetent to issue the said EOGM notice.

56. It is further observed that the EOGM Notice dated 02.08.2025 is conspicuously silent regarding the number of requisitions received as well as the identity of the members who had purportedly submitted such requisitions. The material produced by Col. Jaiveer Singh comprises belated requisitions which, notably, were addressed not to the Secretary General, as mandated under the governing provisions, but to the learned Observer. Moreover, these requisitions were never placed before the EC for its deliberation or approval for convening the EOGM.

57. Additionally, upon perusal of the email addressed by the Uttar Pradesh Equestrian Association to the EFI, it becomes evident that no official communication or notification regarding the proposed EOGM



had been received by them. The EFI Statute mandates that all members must be given a minimum prior notice of fifteen days for convening an EOGM. The learned Single Judge has also noted the submission of the learned Senior Counsel for the EFI that a substantial number of members had not received any notice whatsoever concerning the convening of the EOGM.

58. These omissions, when considered in conjunction with the admitted fact that Col. Jaiveer Singh stood suspended on the date of issuance of the EOGM Notice, unequivocally demonstrate that the statutory preconditions prescribed under the EFI Statute for convening an EOGM were not satisfied. The non-compliance with the mandatory requirement of submitting requisitions to the Secretary General, the addressing of belated requisitions to the Observer instead of the competent authority, and the omission to place such requisitions before the EC for deliberation collectively reveal that the EOGM Notice was issued in gross violation of the procedural framework.

59. Learned Senior Counsel for the Appellant has placed reliance on the judgment of the Supreme Court in *Delhi Lawn Tennis Association (supra)* to contend that an EOGM may be convened by the members even in the absence of action by the Secretary General. However, such reliance is misplaced. In the said case, the rules of the association were silent regarding the procedure for moving a resolution of no-confidence against its office bearers and council members, and the issue before the Court was confined to whether such business could be transacted in an EOGM convened on the requisition of the requisite number of members. The present case stands on an



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entirely different footing. Here, the EFI Statute is not silent; rather, it provides a detailed and specific procedural framework governing the convening of an EOGM. Moreover, the factual circumstances in the present case do not justify the application of the principle relied upon by the Appellant.

60. Further, the reliance placed on the Single Bench decision of the High Court of Andhra Pradesh in *Dr. Srinivasa Rao (supra)* is also misplaced. In that case, the Single Bench held that a requisition for convening a meeting must emanate from the majority of the members of the society. In the present case, however, the requisitions have been submitted by only a few members, and that too under manifestly suspicious circumstances.

61. It has also been found that now only 12 SAs are registered with the EFI, as there has been a systematic effort of certain officers of the Indian Army and its units to take control over the affairs of the EFI. It is also noticed that the Karnataka Association sent an email on 13.08.2025 alleging that the then President of the EFI, Col. Jaiveer Singh, had shown 11 individuals (as listed below) as members in the attendance sheet for AGM convened on 18.08.2024, despite directions of the learned Single Judge restraining the EFI from approving any new membership.

“Major Sridhar S (LM-871)

Saurabh Chaudhary (LM-872)

Sumer Singh (LM-873)

Sunil Kumar Raghuanshi (LM-874)

Lt. Col. M. Pradeep Kumar (LM-875)

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Maj. Agnish Ghose (LM-876)

Jaswinder Singh (LM-877)

Lt. Gen Rajinder Dewan, AVSM, VSM (LM-878)

R. Rajaram Vijaypal (LM-879)

Lt. Col. Satinderpal Singh (LM-880)

Jangeet Singh Nathawat (LM-881)''

62. Further, as per Clause 3.4 of Annexure-II of the Sports Code, NSF at the time of applying for recognition should have affiliated units in at least 2/3rd of the total States/UTs of India. There shall be only one recognised SA/UTA from each State/UT. As per Clause 3.10, the SAs which are affiliated to NSF should, in turn, have a minimum number of affiliated DAs (50% of the districts in the State). Institutions, Associations and Sports Clubs can be members of DAs.

63. As per the composition of the Electoral College for the year 2022, there were 11 institutional members, predominantly comprising the Indian Army and its affiliated institutions, in addition to 153 club members and 12 SAs. The formulation of the Electoral College was thus skewed in favour of clubs and institutional members associated with Indian Army officers. All such members were conferred voting rights for the election of the office bearers of the EFI.

64. Further, it emerges that none of the e-mails containing the requisitions placed on record by Col. Jaiveer Singh through his affidavit dated 13.08.2025, including the requisition attributed to the Appellant, were sent prior to the uploading of the EOGM Notice on the EFI website. On the contrary, several of these requisitions were generated only after the filing of CM No.49192/2025 by REA, pursuant to which the Impugned Order came to be passed. This

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sequence of events, when viewed cumulatively, reasonably supports the inference that the clubs associated with Col. Jaiveer Singh issued these requisitions as an afterthought, evidently at his behest, with the objective of creating an impression that the statutory requirement for convening an EOGM had been duly satisfied.

65. It is evident that serious disputes persist in relation to almost every aspect of the functioning and the present state of affairs of the EFI, including discrepancies with respect to its membership. At a time when the fact-finding exercise entrusted to the Committee is still underway, the learned Single Judge has rightly concluded that there is no rationale in permitting steps that may further complicate the already unsettled situation within the EFI by convening an EOGM.

66. Further, it is pertinent to note that the Impugned Order dated 13.08.2025 has not been assailed by any party to W.P.(C) No.10342/2019, including the EFI whose EOGM stands stayed pursuant to the said Order. Furthermore, none of the clubs which had allegedly submitted requisitions for convening the EOGM have chosen to challenge the Impugned Order. This circumstance further reinforces the conclusion that no member of the EFI has expressed any grievance warranting interference with the directions issued therein.



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CONCLUSION:

67. Keeping in view the aforesaid discussion, it is evident that the present Appeals lack merit and accordingly, are dismissed.

68. All the pending applications shall stand closed.

ANIL KSHETARPAL, J.

HARISH VAIDYANATHAN SHANKAR, J.

DECEMBER 23, 2025

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