



2026:DHC:1804



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

+ **W.P.(C) 10342/2019, CM APPL. 42732/2019, CM APPL. 54682/2019, CM APPL. 16483/2020, CM APPL. 32960/2020, CM APPL. 43562/2021, CM APPL. 31560/2022, CM APPL. 33330/2022, CM APPL. 42691/2022, CM APPL. 54682/2022, CM APPL. 33552/2023, CM APPL. 36897/2024, CM APPL. 48218/2025, CM APPL. 48967/2025, CM APPL. 49192/2025, CM APPL. 55618/2025, CM APPL. 64262/2025 & CM APPL. 11168/2026**

Date of Decision: **18.02.2026**

**IN THE MATTER OF:**

**RAJASTHAN EQUESTRAIN ASSOCIATION** .....Petitioner

Through: Mr. Rajiv Dutta, Senior Advocate  
with Mr. Ashish Kothari, Ms. Pratha  
Pant and Mr. Pratyush Singh,  
Advocates.

versus

**EQUESTRIAN FEDERATION OF INDIA AND ORS.**

.....Respondents

Through: Mr. Vinayak Bhandari and Mr. Ishaan  
Phukan, Advs. for R-1.  
Mr. Chetan Sharma, ASG with Ms.  
Arti Bansal, CGSC with Mr. Udit  
Dedhiya, SPC, Mr. Amit Gupta, Mr.  
R. V. Prabhat Shubham Sharma, Mr.  
Yash Wardhan Sharma, Mr. Naman,  
Ms. Apurva Sachdev, Ms. Shruti Goel  
and Mr. Preyansh Gupta, Advocates  
for R-2  
Mr. T. Singhdev, Mr. Bhanu Gulati,  
Mr. Pratham Mehrotra, Mr. Abhijit



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Chakravarty, Mr. Tanishq Srivastava and Ms. Yamini Singh, Advocates for Manipur Equestrian Association. Mr. Ujjwal Chaudhary & Mr. Vikash Singh, Advocates for R-4. Mr Samar Bansal , Mr Ishan Roy Chowdhury and Ms. Muskan Khatana, for Observer.

**CORAM:**

**HON'BLE MR. JUSTICE PURUSHAINDR KUMAR KAURAV**

### **JUDGEMENT**

#### **PURUSHAINDR KUMAR KAURAV, J. (ORAL)**

The present writ petition has been filed by the Rajasthan Equestrian Association challenging the actions and exemptions granted to the Equestrian Federation of India ('**EFI**') in relation to its governance structure and electoral framework.

2. The petitioner contends that exemptions granted to EFI permitting direct membership and voting rights to clubs, individuals, and other units are arbitrary and contrary to the prescribed governance structure for National Sports Federations, and that such actions distort the electoral college and undermine democratic functioning.

3. For clarity, the reliefs sought in the writ petition are extracted as under:

*"a) Issue a writ of Mandamus or any other writ, order or direction directing the Respondent No. 2 to implement its decision taken vide letter ref. no. 9-12/2017-SP-I dated 01-02-2019 and withdraw the recognition granted to Respondent No. 1 as the National Sport Federation for equestrian sports in India with immediate effect.*

*b) Issue a writ of Mandamus or any other writ, order or direction*



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*directing the Respondent No. 2 to expunge the present executive committee and general assembly of the Respondent No. 1 with immediate effect and appoint an independent ad-hoc committee along with Respondent No. 4, to take over the management and functioning of Respondent no. 1 with the aim to ensure compliance of the National Sports Development Code, 2011 by the Respondent no. 1.*

*c) Issue a writ of Certiorari or any other writ, order or direction to suspend/set aside the notice for annual general meeting issued by the Respondent No. 1, whereby the Respondent No. 1 is seeking to conduct elections of its executive committee illegally, arbitrarily and in violation of the National Sports Development Code, 2011 and in blatant disregard of the directions issued by the Respondent No. 2 vide its letter Ref. No. 9- 12/2017-SP-I dated 01-02-2019 and by Respondent No. 4 vide its letter Ref. No. IOA/Equestrian-8/2019/3168 dated 16-09-2019.*

*d) Pass any other order or direction that this Hon'ble Court deems fit in the facts and circumstances of the case."*

4. Mr. Rajiv Dutta, learned Senior Counsel appearing for the petitioner, seek directions for re-conduct of elections strictly in accordance with the governing sports regulations.

5. Learned Senior Counsel has drawn the attention of this Court to the statutory framework introduced under the National Sports Governance Act, 2025 ("NSG Act"). It is submitted that the said Act establishes a mandatory and comprehensive framework governing the administration, recognition, and election processes of National Sports Federations ("NSFs").

6. It is further pointed out that *vide* notification dated 28.01.2026, the Government of India notified the National Sports Governance (National Sports Body) Rules, 2026 with effect from 01.01.2026. The NSG Act and the Rules framed, thereunder, lay down a statutory regime governing governance standards, compliance requirements, recognition norms, ethical conduct, and institutional accountability within the sports ecosystem.

7. *Vide* notification dated 31.12.2025, certain provisions of the NSG



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Act, including Section 4(1), (2) and (4) relating to the election of executive bodies of NSFs, were brought into force with effect from 01.01.2026. The notification issued by the Ministry of Youth Affairs and Sports clarifies that the specified provisions shall come into force from the said date, thereby operationalising the statutory election framework. The relevant extract of the aforesaid notification reads as under-

*“S.O. 6152(E). In exercise of the powers conferred by sub-section (2) of section 1 of the National Sports Governance Act, 2025 (25 of 2025), the Central Government hereby appoints the 1st January, 2026, as the date on which the provisions of sections 1 to 3, sub-sections (1), (2) and (4) of section 4, sub-sections (1) and (2) of section 5, sub-section (5) of section 8, sub-section (1) of section 11, section 14, section 15, sub-sections (1) to (7) and (10) of section 17, section 30, section 31, sections 33 to 38 of the said Act, shall come into force.”*

8. The Government of India has further directed all NSFs to ensure strict adherence to the notified provisions of the NSG Act and the Rules framed thereunder, and to align their constitutions, by-laws, and institutional processes with the statutory framework within the stipulated period. Uniform compliance has been emphasised to ensure an orderly transition to the governance structure contemplated under the Act.

9. It is also noted that vide order dated 22.12.2025, the Government of India directed every NSF to undertake restructuring of its General Body and to ensure that voting members and affiliate units are aligned with the provisions of the NSG Act.

10. During the course of hearing, it is not in dispute that elections of the EFI ought to be conducted expeditiously. All parties are *ad idem* on this aspect.

11. It is an admitted and undisputed position that the Executive



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Committee of the EFI was elected on 29.09.2019. The said Committee had a fixed tenure which expired in September 2023. Upon expiry of its tenure, the Committee ceased to have any independent statutory or electoral mandate to continue.

12. However, disputes having arisen in relation to the 2019 elections, multiple writ petitions came to be filed before this Court, *inter alia*, W.P.(C) 10342/2019 and W.P.(C) 5989/2022, along with connected matters. During the pendency of these proceedings, interim orders were passed from time to time permitting the Executive Committee elected in 2019 to continue functioning.

13. Subsequently, by order dated 29.05.2024 passed by the Division Bench in LPA 449/2024, the Executive Committee as constituted pursuant to the November 2019 elections and as it existed on 18.12.2019, was reinstated with certain modifications. The Division Bench recorded that Ms. Vanita Malhotra and Lt. Col. Raj Sangram Singh had earlier been co-opted as ex-officio members without voting rights owing to their positions in the Athletes Commission, and that upon their demitting office, Lt. Col. Ashish Malik (Chairperson) and Maj. Ritika Dahiya (Vice Chairperson) of the Athletes Commission were to be co-opted in their place.

14. Accordingly, the Division Bench directed that the Executive Committee constituted pursuant to the November 2019 elections be reinstated with the aforesaid substitution. The impugned order dated 21.05.2024 was suspended till disposal of the pending writ petitions by the learned Single Judge. The material part of the aforesaid order reads as under:-

*“4. Learned senior counsel for the appellant states that Ms. Vanita*



*Malhotra and Lt . Col . Raj Sangram Singh were then co-opted in the Executive Committee of the EFI, as ex-officio members without any right to vote due to the positions then held , by them, in the Athletes Commission. He states however, they have since demitted offices and currently Lt. Col. Ashish Malik is the Chairperson and Maj. Ritika Dahiya is the Vice Chairperson, of the Athletes Commission. He states that it may therefore be directed that Lt . Col. Ashish Malik and Maj. Ritika Dahiya will be part of the Executive Committee in place of Ms. Vanita Malhotra and Lt. Col. Raj Sangram Singh.*

*5. Accordingly, the Executive Committee constituted pursuant to EFI elections held in November, 2019 , and as it existed on 18<sup>th</sup> December, 2019, is reinstated with the modification that Lt. Col . Ashish Malik and Maj. Ritika Dahiya are co-opted in place of Ms. Vanita Malhotra and Lt. Col. Raj Sangram Singh respectively. And, the impugned order dated 21<sup>st</sup> May, 2024 is suspended till the learned Single Judge disposes of the writ petitions being W.P.(C) 10342/ 2019 and W. P.(C) 5989/2022. This Court once again clarifies that the aforesaid interim arrangement has been made in view of the impending Paris Olympics, 2024.*

*6. Since the matter has been pending before the learned Single Judge for some time and the matter requires expeditious disposal, the Registry is directed to list the aforesaid two writ petitions alongwith W.P.(C ) 10783/ 2022 and W. P.(C ) 2036/2022 before Hon'ble Mr. Justice Sanjeev Narula . For this purpose, list the matter before Hon'ble Mr . Justice Sanjeev Narula on 2<sup>nd</sup> July, 2024 . This Court clarifies that the rights and contentions of all the parties are left open. With the aforesaid directions, the present appeals and applications are disposed of.”*

15. Thus, it is seen that the functioning of the Executive Committee subsequent to its expiration has been solely by virtue of interim arrangements passed by this Court, pending final adjudication of the writ petitions

16. At this stage, Mr. Chetan Sharma, learned ASG appearing for the Union of India, submits that with the conclusion of the Paris Olympics, 2024, the very basis for continuation of the erstwhile Executive Committee no longer subsists. It is contended that EFI is presently functioning without a duly elected body, contrary to the National Sports Development Code, 2011 and the settled principles of democratic governance. He therefore, has filed



IA No. 64262/2025 for the following reliefs:

*“a) Allow the present CM Application and allow Respondent No. 2 to direct IOA to constitute an Ad-Hoc Administrative Committee for EFI, in consultation with FEI for administration of EFI, preparation and participation of athletes in international events, and conduct of fresh elections in strict compliance with the National Sports Development Code, 2011, extant guideline and applicable laws; and  
b) Pass such further order(s) as this Hon’ble Court may deem fit and proper in the interest of justice.”*

17. The Court also notes that under similar circumstances in respect of the Judo Federation Of India, this Court in ***Karnataka Judo Association And Anr V. Judo Federation Of India And Ors.***<sup>1</sup>, has directed for expeditious conduct of elections with appropriate interim arrangements under the supervision of a Court-appointed Administrator.

18. Thus, in the aforesaid factual backdrop, this Court is of the considered view that conduct of fresh elections to the Executive Committee of the EFI is the need of the hour.

19. As already noted hereinabove, the tenure of the elected body expired in September 2023, and its continuation thereafter has been solely on the strength of interim arrangements made by this Court in view of the exigencies then prevailing on account of the impending Paris Olympics. With the conclusion of the said event, there no longer subsists any justifiable basis for perpetuation of an unelected body, governing the day-to-day affairs of EFI.

20. Pertinent to also observe that the coming into force of the NSG Act and the notified Rules has steered a binding statutory regime mandating

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transparency, democratic representation, and institutional accountability within NSFs. In such circumstances, permitting EFI to continue without a duly elected body would be inconsistent with both the statutory framework and the principles of democratic representative governance.

21. In view of the above circumstances, and having regard to the statutory regime now in force under the NSG Act, this Court deems it appropriate to issue the following directions:

- i. The Indian Olympic Association shall forthwith appoint an Ad-Hoc Committee to take over the administration of EFI. The present Executive Committee of EFI shall hand over charge to the Ad-Hoc Committee within seven days from the date of its appointment.
- ii. The Ad-Hoc Committee shall, within a period of 2 months from the date of its appointment, finalise the Constitution and By-laws of EFI in conformity with NSG Act, and the Rules framed thereunder.
- iii. Upon finalisation of the Constitution and By-laws, the Ad-Hoc Committee shall notify elections within thirty days. Upon completion of the electoral process, the newly elected body shall assume charge of the administration of EFI.
- iv. The elected body shall, as its first measure, ratify and adopt the Constitution of EFI in strict compliance with the mandate of the NSG Act and the applicable Rules.

22. With the aforesaid directions, the writ petition along with all pending applications, stands disposed of.

**PURUSHAINDR KUMAR KAURAV, J**  
**FEBRUARY 18, 2026/JYH/mj**