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

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**Date of Decision: 24.04.2026**

% LPA 104/2026

**PRESIDENT, INDIAN OLYMPIC ASSOCIATION & ANR.**

.....Appellants

Through: Ms. Aashita Khanna and Ms. Aanya  
Agarwal, Adv

versus

**SKI AND SNOWBOARD INDIA & ANR.**

.....Respondents

Through: Ms. Neha Singh, Adv. for R-1.  
Mr.Udi Dedhiya, SPC with  
Ms.Apurva Sachdev, Mr.Preyansh  
Gupta, Adv. and Mr.Amit Rana, GP  
for R-2.**CORAM:****HON'BLE THE CHIEF JUSTICE****HON'BLE MR. JUSTICE TEJAS KARIA****DEVENDRA KUMAR UPADHYAYA, CJ. (ORAL)****REVIEW PET. 189/2026 & CM APPL. 26660/2026**

1. Heard learned counsel for the review applicant/petitioner.
2. By instant review petition, the review petitioner has sought review of the final judgment and order dated 23.03.2026 whereby LPA No. 104/2026 filed by the President, Indian Olympic Association against the order dated 10.02.2026 passed by the learned Single Judge, has been disposed of with a minor modification of the order passed by the learned Single Judge.



3. The W.P.(C.) No. 3418/2025 was instituted by the review petitioner primarily challenging the order dated 13.10.2023 whereby a Four-Member Ad Hoc Committee was formed by the Indian Olympic Association to look after the affairs of the review petitioner.
4. The writ petition was allowed by the learned Single Judge by means of the order dated 10.02.2026 whereby the order impugned therein, dated 13.10.2023, was set aside and it was observed by the learned Single Judge that the Ad Hoc Committee stood dissolved with immediate effect. The learned Single Judge also appointed a retired Judge of this Court as Returning Officer to draw up the list of eligible members of the review petitioner and conduct its elections. The learned Single Judge also determined Rs. 5 Lakhs per month to be paid to the Returning Officer as her fee.
5. While upholding the order passed by the learned Single Judge to the extent it had quashed the order dated 13.10.2023, we only set aside the direction issued to the Indian Olympic Association to bear the fee to be paid to the Returning Officer and directed that the fee shall be paid by the review petitioner. The reason for absolving the Indian Olympic Association of the charge of payment of fee to the Returning Officer was that the review petitioner is an independent society, elections of which is the responsibility of the association or its office bearers themselves and, therefore, for conducting the election, no third party, in this case the Indian Olympic Association, can be saddled with the burden of bearing the fee to be paid to the Returning Officer for conducting the elections of the review petitioner.
6. Learned counsel for the review petitioner has stated that the judgment



and order under review records a wrong finding that the review petitioner is not a recognised national sports federation. Such finding, according to the learned counsel for the review petitioner is not sustainable for the reason that the review petitioner is an affiliated body of the Indian Olympic Association and, therefore, it is a National Sports Federation.

7. The said submission is absolutely untenable for the reason that prior to enforcement of National Sports Governance Act, 2025, the entire regime of recognising a body or association as National Sports Federation was governed by the National Sports Development Code of India issued in the year 2011. Clause 8 of the National Sports Code, 2011 (hereinafter referred as “**Sports Code, 2011**”) explicitly provides that for the purpose of ensuring that National Sports Federations maintain certain basic standards, norms and procedures in respect of their internal functioning which conforms to the principles and objectives laid down by international federation and which are also in consonance with the principles laid down in the Olympic Charter, the National Sports Federations seeking recognition will have to apply as per the guidelines appended as annexure-2 to the Sports Code, 2011. The Sports Code, 2011 also provides conditions of eligibility as a recognized National Sports Federation and the procedure for such recognition. There is no other instrument or provision which provides for recognition of any sports body as a National Sports Federation which function is now governed by the provisions of 2025 Act. Prior to enforcement of 2025 Act, the only provision for recognition of any body or association as National Sports Federation was the Sports Code, 2011.

8. Learned counsel for the review petitioner has, however, stated that



prior to enforcement of 2025 Act, there were two types of National Sports Federations, the one recognised by the Ministry of Sports and Youth Affairs, Government of India under the Sports Code, 2011 and the other by the Indian Olympic Association under its memorandum and rules and regulations.

9. Our attention has been drawn to Clause 3 of the Memorandum and Rules and Regulations of Indian Olympic Association which provides for membership of Indian Olympic Association. According to Clause 3, membership of association shall be open to certain category of organisations which include the National Sports Federations affiliated to International Sports Federations which adhere to the International and National Sports Code in respect of sports included in the Summer and Winter Olympic Games, National Sports Federations affiliated to International Sports Federations which adhere to International and National Sports Code in respect to sports not included in the Summer and Winter Games but included in Asian or Commonwealth Games, National Sports Federations affiliated to International Sports Federation which adhere to International and National Sports Code in respect of sports not included either in Summer or Winter Games or Asian or Commonwealth Games and National Sports Federations of indigenous games. Certain other category of individuals are also eligible to become member of Indian Olympic Association.

10. Thus, submission of the learned counsel for the review petitioner that Clause 3 of Memorandum and Rules and Regulations of Indian Olympic Association also provides for registration or recognition as National Sports Federation is absolutely misconceived and incorrect for the reason that what



Clause 3 of Memorandum and Rules and Regulations of Indian Olympic Association prescribes is the eligibility for its membership. Attaining of eligibility of membership of Indian Olympic Association does not mean recognition as National Sports Federation which is permissible only under the provisions of the National Sports Code, 2011.

11. For the aforesaid reasons, we are of the view that the review petition is absolutely misconceived. Learned counsel for the review petitioner completely fails to point out any error apparent on the face of record of our judgment and order dated 23.03.2026.

12. The review petition is, thus, dismissed with a cost of Rs.10,000/- to be deposited by the review petitioner in the account of Delhi High Court Bar Clerk's Association (A/c. No. 15530100006282, IFSC – UCBA0001553, UCO Bank, Delhi High Court Branch, New Delhi) within a month, failing which, it shall be lawful for the Registrar General of this Court to get the amount of costs recovered as arrears of land revenue.

**DEVENDRA KUMAR UPADHYAYA, CJ**

**TEJAS KARIA, J**

**APRIL 24, 2026**

*N.Khanna*