



2026:DHC:8241-DB



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

% ***Judgment Reserved on: 22.09.2026***
Judgment Delivered on: 24.09.2026

CNR No. DLHC010452752026

+ **LPA 761/2026, CM APPL. 65152/2026 & CM APPL. 65153/2026**

**MASTER SHUBH CHOWDHARI
THROUGH HIS FATHER**

....Appellant

versus

EQUESTRIAN FEDERATION OF INDIA & ORS. ...Respondents

Advocates who appeared in this case

For the Appellant : Ms. Manini Brar with Mr. O.P. Harsh Singh
Munday and Mr. Siddhant Chhabra,
Advocates.

For the Respondents : Mr. Tanmaya Mehta, Ms. Niyati Kohli, Mr.
Rishabh Parikh, Mr. Pinank Mehra and Ms.
Isha Kakkar, Advocates for R-1&2.
Mr. Kartik Yadav, Ms. Sumedha Chadha,
Mr. Duvva Pawan Kumar, Mr. Sai Krishna
Kumar and Ms. Shradha Gupta, Advocates
for R-3.
Mr. Kapil Modi with Mr. Shiv Verma and
Mr. Shorya Goel, Advocates for R-4.

**CORAM:
HON'BLE THE CHIEF JUSTICE
HON'BLE MR. JUSTICE TEJAS KARIA**



JUDGMENT

TEJAS KARIA, J

1. The present Appeal has been preferred by the Appellant challenging the judgment dated 17.09.2026 (“**Impugned Judgment**”) rendered in W.P.(C) 12662/2026 (“**Writ Petition**”), whereby the Writ Petition preferred by the Appellant was dismissed.

FACTUAL MATRIX

2. Respondent No. 1, the *Ad Hoc* Committee has been entrusted with the governance of the Equestrian Federation of India (“**EFI**”), the National Federation responsible for conducting national-level selections for participation in international equestrian events, including Show Jumping at the Youth Olympic Games, Dakar, Senegal, 2026 (“**YOG 2026**”). Respondent No. 2, the Indian Olympic Association is responsible for selecting athletes to represent India at the Olympic Games, Asian Games and other international sports competitions, and managing Indian teams at these events.

3. On 08.05.2026, an information brochure was issued in respect of YOG 2026. The brochure stipulated that the selection process would commence with the notification of eligibility criteria by the Fédération Équestre Internationale (“**FEI**”), and that entries from National Olympic Committees were required to be received by 25.09.2026. Thereafter, the FEI issued eligibility criteria for Show Jumping, requiring a rider to incur not more than eight penalties in any one of the specified competitions to be issued a Certificate of Capability (“**COC**”), which constituted a precondition for participation in the national-level selection trials.



4. On 08.11.2025 and 10.11.2025, the Youth Olympics qualifying rounds, namely Competition 3, Category A of the FEI Jumping World Challenge, were conducted at Bengaluru, Karnataka, and Meerut, Uttar Pradesh, respectively, on courses laid out in accordance with the FEI Regulations, 2026 (“**Regulations**”). Six of the seven riders who obtained COCs, including the Appellant, qualified in these rounds based on a minimum jump height of 130 cm. The Appellant was issued a COC dated 20.05.2026 based on his result at Bengaluru, Karnataka, on 08.11.2025. The COC, bearing the signature of the President of EFI, was received by him on 10.06.2026.

5. On 08.05.2026, EFI uploaded on its website the selection criteria for YOG 2026 (“**Selection Criteria**”). Clause 5 thereof provided that, where more than one athlete obtained a valid COC within the FEI deadline, EFI would assess the athletes with reference to the technical difficulty and level of competitions completed, consistency of international performance, recency of results relative to YOG 2026, stability of the horse-rider combination, and championship readiness. On 20.05.2026, the FEI confirmed that seven Indian riders, including the Appellant, had obtained valid COCs for YOG 2026.

6. By e-mail dated 10.06.2026 (“**E-mail**”), EFI informed the seven riders holding valid COCs that they had been included in the long list of riders under consideration for YOG 2026. The riders were required to submit their latest competition results and performance records by 25.07.2026. The E-mail further stated that the final selection would be based on an objective assessment of recent performances, consistency of results, competitiveness at CSI1*/CSI2* events, and overall merit.



7. By e-mail dated 10.07.2026 (“**Clarification E-mail**”), EFI issued a clarification to the Selection Criteria, stating that only results obtained at CSI1*/CSI2* events at a minimum height of 130 cm would be considered for MER and performance consistency.
8. Between 12.07.2026 and 19.07.2026, the Appellant participated in the Portugal Summer Tour 2026 at Esposende, Portugal, in the Medium Class (130 cm) category and completed five rounds.
9. On 17.07.2026, EFI constituted a Show Jumping Selection Committee (“**Selection Committee**”). Prior to the cut-off date of 25.07.2026, the Appellant submitted the aforesaid results to the Selection Committee, together with a performance summary addressing recency, consistency, competitiveness at the CSI2* level, and overall merit, including his earlier shortlisting to represent India at the Asian Youth Games 2025, Bahrain.
10. On 06.08.2026, the Selection Committee rendered its decision (“**Selection Decision I**”), placing Respondent No. 3, Mr. Shresht Raju Mantena, at Rank No. 1; Respondent No. 4, Ms. Vaasvi Khaitan, at Rank No. 2; and the Appellant at Rank No. 3, by giving priority to results at 135 cm over those at 130 cm. On 10.08.2026, Selection Decision I and the announcement of selection were uploaded on EFI’s website. Aggrieved thereby, the Appellant instituted W.P.(C) No. 11935/2026 on 14.08.2026.
11. On 16.08.2026, EFI issued a notification (“**Addendum**”) titled “*Addendum to the Selection of One Show Jumping Rider to Represent India at the Youth Olympic Games*”, recording its intention to reconsider Selection Decision I.
12. *Vide* order dated 18.08.2026 passed in W.P.(C) No. 11935/2026, the learned Single Judge recorded the submission on behalf of EFI that the



Appellant's representation was pending, as well as the Appellant's contention that the Selection Committee had not been properly constituted. EFI was directed to decide the representation within two weeks and communicate the decision to the Appellant. It was further directed that, if the representation were decided against the Appellant, the names of the other applicants would be withheld for three days to enable him to institute a fresh writ petition. The said writ petition was disposed of in the aforesaid terms, with liberty reserved to the Appellant to approach the Court again in the event of any further grievance.

13. Following the order dated 18.08.2026, the strength of the Selection Committee was increased from three members to five. The Appellant thereafter submitted a representation dated 19.08.2026 ("**Representation**") to the Selection Committee, referring to the Selection Criteria and the e-mails dated 10.06.2026 and 10.07.2026. Between 21.08.2026 and 25.08.2026, correspondence was exchanged concerning the grant of a personal hearing to the Appellant before the Selection Committee.

14. As recorded in the Minutes dated 24.08.2026 ("**Minutes**"), the Selection Committee adopted the period from 08.05.2026 to 25.07.2026 for assessing the results of the eligible riders. On 24.08.2026, the window for EFI to notify India's selection to the FEI commenced; the said window closes on 25.09.2026.

15. On 24.08.2026, the Appellant's father, Mr. Kunal Chowdhari, appeared before the Selection Committee, relied upon the Representation, and requested that his son be selected as the principal rider on the basis of merit.



16. On 27.08.2026, EFI issued Selection Decision II (“**Selection Decision II**”), which was communicated to the Appellant and the other participating athletes. Thereunder, Respondent No. 3 was placed at Rank No. 1, the Appellant at Rank No. 2, and Respondent No. 4 at Rank No. 3. Selection Decision II accorded equal weightage to results at 130 cm and 135 cm.

17. Aggrieved by Selection Decision II, the Appellant instituted the Writ Petition on 29.08.2026, challenging the said decision. *Vide* the Impugned Judgment, the learned Single Judge dismissed the Writ Petition upon holding that Selection Decision II was neither *mala fide*, arbitrary, perverse, nor contrary to the notified criteria, and that no legal infirmity warranting interference had been established. Aggrieved by the Impugned Judgment, the Appellant preferred the present Appeal.

SUBMISSIONS ON BEHALF OF THE APPELLANT

18. Ms. Manini Brar, learned Counsel for the Appellant made the following submissions:

- 18.1. The Impugned Judgment failed to adjudicate the principal issue raised by the Appellant that whether Selection Decision II was rendered in conformity with the Selection Criteria notified by EFI. Once notified, the Selection Criteria were required to be applied strictly by assessing the consistency of each rider’s latest results with reference to the lowest number of penalties incurred. They could not be altered during the course of the selection process to substitute a criterion based solely on the number of rounds attempted, irrespective of the penalties incurred.
- 18.2. The Selection Criteria were notified in three stages. Clause 5 of the Selection Criteria uploaded on EFI’s website on 08.05.2026



provided that, where more than one athlete held a valid COC, EFI would assess the athletes based on technical difficulty, consistency of international performance, recency of results, stability of the horse-rider combination, and championship readiness. The E-mail informed the riders that the final selection would be based on an objective assessment of recent performances, consistency of results, competitiveness at CSI1*/CSI2* events, and overall merit. The Clarification E-mail further clarified that only results obtained at CSI1*/CSI2* events at a minimum height of 130 cm would be considered. None of these criteria refers to the number of rounds attempted.

- 18.3. The operative portion of Selection Decision II does not refer to the Selection Criteria. Paragraph 5 of the Minutes, titled *“Proceedings 3 – Review of submissions and results”*, contains only a general reference to *“overall merit”*, which constitutes merely one component of the notified criteria. No reasons have been recorded for placing Respondent No. 3 at Rank No. 1, the Appellant at Rank No. 2, or the remaining riders at their respective ranks.
- 18.4. In Selection Decision I, Respondent No. 3 was ranked first on the basis that results obtained at 135 cm were accorded precedence over those obtained at 130 cm, notwithstanding that the jump height at YOG 2026 is fixed. The Appellant challenged Selection Decision I in W.P.(C) 11935/2026, following which EFI reconsidered the selection. Although EFI accepted in Selection Decision II that priority could not be accorded based on jump



height, Respondent No. 3 was again placed at Rank No. 1 after excluding his results carrying penalties of 20 and 12 points.

- 18.5. Without recording any explanation, EFI excluded Respondent No. 3's result dated 21.06.2026 in the CSI1* Grand Prix at Cluny at 135 cm, in which he incurred 20 penalties, as well as his result dated 27.06.2026 in the CSI1* Gold Tour at Budapest, Hungary at 135 cm, in which he incurred 12 penalties (4+8). Both were completed rounds at the CSI1* level and above the prescribed minimum height of 130 cm. Completion of the 20-penalty round is further evident from the video of that round placed on record. In contrast, the Appellant did not incur more than eight penalties in any of the five results obtained by him at 130 cm in Esposende, Portugal, between 12.07.2026 and 19.07.2026.
- 18.6. The consistency of recent results could not be assessed without considering all results obtained during the period from 08.05.2026 to 25.07.2026, being the assessment period fixed by the Selection Committee itself. EFI could not selectively exclude the unfavourable results of Respondent No. 3 while relying upon his remaining results to place him above the Appellant.
- 18.7. The learned Single Judge erred in holding that the Selection Criteria contemplated only results involving not more than eight penalty points. No such limitation forms part of the Selection Criteria. The eight-penalty threshold applies exclusively at the eligibility stage for obtaining a COC. At the selection stage, all results were required to be considered, as only such a comprehensive assessment could determine a rider's consistency.



Selection Decision II could not rely upon the FEI eligibility standard, which serves a purpose distinct from that of the Selection Criteria.

- 18.8. The learned Single Judge further erred in holding that a rider securing the lowest average penalty points need not necessarily rank above a rider having a greater number of qualifying results. Under the Regulations, every rider negotiates a fixed course of the same height and length on a single occasion and is ranked first by penalties and thereafter by time. Since penalties determine the winner at the Games, the rider selected to represent India ought to be the rider with the lowest overall penalties, namely, the lowest average. Consistency could not be assessed by counting “*qualifying results*”, as no such concept appears in the Selection Criteria and each course at the Games may be attempted only once.
- 18.9. The number of rounds attempted could not have been accorded priority because: (i) the riders were neither required to submit, nor did they submit, a fixed number of results capable of enabling a “*best of*” comparison; (ii) the number of rounds was never notified as a selection criterion; and (iii) at YOG 2026, each rider is permitted only one attempt at the course in each competition, rendering the number of rounds irrelevant. Had the Appellant been informed that the number of rounds would be preferred over consistency measured by penalties and time, he could have submitted results from additional rounds, including those involving higher penalties, as Respondent Nos. 3 and 4 had done.



Instead, in accordance with the notified Selection Criteria, the Appellant submitted his latest results carrying low penalties to demonstrate consistency.

18.10. Even on the basis of the results considered in Selection Decision II, Respondent No. 3 incurred 22 penalties across five rounds (8, 4, 0, 6 and 4), resulting in an average of 4.4 penalties per round. The Appellant incurred 14 penalties across four rounds (4, 0, 6 and 4), resulting in an average of 3.5 penalties per round. The Appellant, therefore, incurred fewer penalties and demonstrated greater consistency and ought consequently to have been placed at Rank No. 1.

18.11. The explanations given by EFI neither formed part of Selection Decision II nor found support in the record. Selection Decision II was required to be assessed solely based on the reasons recorded therein and not on supplementary reasons subsequently advanced. In any event:

- i. It is incorrect that Respondent No. 3 competed at a higher technical level. Under the FEI Jumping Rules, technical difficulty is set by the CSI level, CSI5* being highest and CSI1* lowest. The Appellant's results were at CSI2*, while Respondent No. 3's were at CSI1*. 'Grand Prix' only describes the final-day event with higher prize money and has nothing to do with technical difficulty.
- ii. The contention that Respondent No. 3 competed more often at 135 cm is irrelevant, since priority to height was never a criterion. Selection Decision II itself records equal



weightage to 130cm and 135cm. Giving priority to height was the very reason the Appellant challenged Selection Decision I in W.P.(C) 11935/2026 and for which EFI reconsidered Selection Decision I.

- iii. The contention that Respondent No. 3 performed better in a common competition is also irrelevant, since this was never a criterion. Had it been, all riders would have had to compete in the same events. In fact, on 24.08.2026, a proposal that the top three riders compete in one common event was rejected, since some riders were based in India and some abroad.

18.12. Selection Decision II disregarded the criteria actually notified, namely, merit, competitiveness, technical difficulty, and consistency. The Appellant competed at a higher technical level and incurred fewer penalties than Respondent No. 3. In terms of overall merit, the Appellant was the only rider under consideration to have been shortlisted for the Asian Youth Games 2025, Bahrain, and was recommended to EFI by the Portugal Equestrian Federation following his performance at Esposende, Portugal.

18.13. Clause 33.3 of the Interim Constitution of EFI (**“Interim Constitution”**), relied upon by EFI its reply before the learned Single Judge, mandates that objective criteria be published in advance. In *Chirag Khandal v. Equestrian Federation of India & Ors.*, Neutral Citation: 2023:DHC:2254, this Court held that selection norms cannot be altered after the commencement of the selection process. The introduction, after the competitions had



concluded and the results had been submitted, of the number of rounds as a ranking criterion amounted to changing the rules of the game after the game had been played.

- 18.14. In ***Manjeet v. Indian Olympic Association & Ors.***, 2026 SCC OnLine Del 362, this Court held that a selecting body cannot assume the role of a “*Super Selector*” by devising criteria extraneous to the governing qualification system. By applying a criterion absent from both the Selection Criteria and the Regulations, EFI acted as a “*Super Selector*”.
- 18.15. The retrospective and undisclosed application of the number of rounds as the determinative criterion violated the principles of natural justice and resulted in unequal treatment of similarly situated riders, without any rational nexus to the object of the selection. Had the Appellant been informed, at any stage prior to the selection, that a criterion other than those notified would be treated as determinative, he could have submitted his results accordingly. The deprivation of that opportunity caused irreversible prejudice to the Appellant.
- 18.16. Following the institution of W.P.(C) No. 11935/2026 by the Appellant, the strength of the Selection Committee was increased from three members to five. Neither the reason for, nor the authority under which, such enlargement was effected is apparent, and the reconstituted Selection Committee was not constituted in accordance with the rules governing EFI.
- 18.17. Respondent No. 3, who was placed at Rank No. 1 in both Selection Decisions I and II, is associated with a major corporate



group that sponsors show jumping competitions and owns horses and stables. It was submitted that these circumstances indicate that Selection Decision II was directed towards securing the selection of Respondent No. 3, rather than identifying the most meritorious rider, and was therefore arbitrary and *mala fide*. Respondent Nos. 3 and 4 were impleaded only because the outcome of the proceedings affects them; no personal allegations were made against either of them.

- 18.18. The relief sought by the Appellant does not necessitate a fresh competition. The results of all riders were submitted before the cut-off date of 25.07.2026 and have already been verified against the FEI database. The exercise required is limited to assessing those results in accordance with the Selection Criteria and ranking the riders by reference to consistency of performance, measured based on penalties incurred in the latest competitions.
- 18.19. The window within which EFI is required to notify its selection to the FEI commenced on 24.08.2026 and closes on 25.09.2026. Once the selection is notified to the FEI, it cannot be altered save in the event of illness or injury of the selected rider. The impending deadline therefore warrants expeditious completion of the limited exercise sought by the Appellant and does not constitute a ground for declining relief.
- 18.20. Accordingly, the Impugned Judgment and Selection Decision II are liable to be set aside, and the Appellant ought to be declared first in the order of merit under the Selection Criteria.



SUBMISSIONS ON BEHALF OF EFI

19. Mr. Tanmaya Mehta, learned Counsel for EFI made the following submissions:

19.1. The selection of sportspersons to represent the country falls within the exclusive domain of the National Sports Federation and its duly constituted expert Selection Committee. In the exercise of its writ jurisdiction, this Court does not sit in appeal over the assessment of comparative sporting merit made by such experts, nor may it substitute its own evaluation for theirs. Judicial interference is warranted only where the selection process is shown to be *mala fide*, perverse, arbitrary, or contrary to binding criteria. None of these grounds is established in the present case. In support of the aforesaid proposition, reliance was placed upon the following decisions:

i. ***Dalpat Abasaheb Solunke v. B.S. Mahajan***, (1990) 1 SCC 305;

ii. ***Basavaiah v. H.L. Ramesh***, (2010) 8 SCC 372; and

iii. ***Sushil Kumar v. Union of India***, 2016 SCC OnLine Del 3660.

19.2. Selection Decision II was rendered following a fair reconsideration undertaken pursuant to the order dated 18.08.2026 in W.P.(C) No. 11935/2026, whereby EFI was directed to decide the Appellant's Representation within two weeks and, in the event of an adverse decision, to withhold disclosure of the names of the other riders for three days. Even prior to the said order, the *Ad Hoc* Committee had suspended Selection Decision I by issuing the Addendum and had invited representations from all riders.



- 19.3. On 24.08.2026, the Selection Committee heard the Appellant's father and the representatives of the other riders, considered the written representations, including that of the Appellant, verified each rider's results against the FEI database, and recorded its reasons in the Minutes of the same date. The *Ad Hoc* Committee accepted the recommendation by Resolution dated 27.08.2026, communicated the decision to all COC holders, and withheld its public disclosure for three days.
- 19.4. The contention that Selection Decision II is unreasoned is without merit. The Minutes record the assessment window, the heights and formats considered, the treatment accorded to two-phase competitions, and the order of merit, together with each rider's qualifying performances.
- 19.5. The Appellant does not dispute the Selection Criteria dated 08.05.2026, 10.06.2026, and 10.07.2026, and has himself relied upon them as the governing criteria. The Selection Committee applied those criteria on 24.08.2026. Having never challenged their validity, the Appellant cannot be permitted to do so at this stage.
- 19.6. Nothing in the Selection Criteria provides that riders are to be ranked by calculating the arithmetic average of their penalties. It is the Appellant, rather than EFI, who seeks to introduce an unnotified criterion derived from the competition format of the Games themselves.
- 19.7. The notified criterion is consistency, which necessarily connotes the repetition of a standard of performance across competitions. Consistency cannot be assessed based on a solitary result or by



employing an average that rewards a rider for competing on fewer occasions. The Appellant himself pleaded before the learned Single Judge that “*consistency of performance essentially means repeatedly low penalties, at or below 8 points*”. The Selection Committee applied precisely that standard, based on which Respondent No. 3 recorded a greater number of qualifying performances than the Appellant.

- 19.8. The Selection Committee adopted a clear methodology: (i) it fixed the assessment period from 08.05.2026, when the Selection Criteria were published, to 25.07.2026, the cut-off date, while also taking into account each rider’s COC result; (ii) it considered all results at CSI1*/CSI2* level and above, at heights of 130 cm and above, according equal weightage to results at 130 cm and 135 cm and thereby accepting the Appellant’s objection to Selection Decision I; (iii) it excluded two-phase competitions in which a rider completed only the first phase; (iv) it treated a completed round involving not more than eight penalties as a qualifying performance, consistently with the FEI standard for issuance of a COC and the standard relied upon by the Appellant himself; and (v) it verified every rider’s results against the FEI database. This methodology was applied uniformly to all seven COC holders. On that basis, Respondent No. 3 recorded five qualifying performances, the Appellant four, and Respondent No. 4 three. As a direct consequence of the reconsideration, the Appellant advanced from third position in Selection Decision I to second position in Selection Decision II.



- 19.9. The grievance concerning the exclusion of Respondent No. 3's 20-penalty result in the Grand Prix at Cluny is untenable, since a round carrying 20 penalties did not qualify under the standard applied to any rider. Similarly, the Appellant's own non-qualifying results, including two-phase rounds in which he completed only the first phase, were excluded. The Appellant cannot seek the exclusion of his own non-qualifying results while simultaneously insisting upon the inclusion of the non-qualifying results of Respondent No. 3.
- 19.10. The Appellant's computation of average penalties is self-serving. It considers only four rounds carrying an aggregate of 14 penalties, while omitting his own eight-penalty round. In his Representation, the Appellant had himself calculated five rounds carrying an aggregate of 22 penalties, yielding an average of 4.4 penalties per round, the very figure he now attributes to Respondent No. 3. The computation has thus varied across pleadings, and, in any event, the methodology of averaging penalties formed no part of the Selection Criteria.
- 19.11. The Appellant's contention that he would have submitted additional rounds is equally untenable. By the E-mail, all riders were required to submit their latest results by 25.07.2026. In any event, the Selection Committee did not confine itself to the results submitted but verified each rider's complete record against the FEI database, which records every start by every rider. The Appellant's international results within the assessment period were confined to a single tour at Esposende, Portugal. Respondent



No. 3, by contrast, competed in Italy, France, and Hungary, and secured qualifying results at both 130 cm and 135 cm, including in Grand Prix events. The Selection Committee was entitled to regard these circumstances as demonstrating greater consistency, competitiveness, and technical level, all of which formed part of the notified criteria.

19.12. The allegations of bias and *mala fides* are unsupported by the record. The *Ad Hoc* Committee functions under the supervision of this Court and has no interest in the selection of any particular rider. Although the Appellant's achievements are matters of record, they fall outside the relevant assessment period and are not material to the criteria governing the present selection. The averments concerning the family of Respondent No. 3 are irrelevant, and the draft e-mail attributed to the Portugal Equestrian Federation does not purport to recommend the Appellant in preference to any other rider.

19.13. The Selection Committee was constituted in the ordinary course by Resolution of the *Ad Hoc* Committee dated 17.07.2026. After the Appellant objected on 18.08.2026 that it had not been properly constituted, its strength was increased to five members, including experienced riders and officials, so that the reconsideration could be undertaken by a broader body. No rule requires the constitution of a Selection Committee to be notified to riders in advance or limits its membership to three persons. The Appellant participated, through his father, in the proceedings before the reconstituted Selection Committee without objecting to its



composition and cannot now assail that composition merely because the outcome was adverse to him.

- 19.14. The reconsideration was sought by the Appellant himself through W.P.(C) No. 11935/2026 and the Representation. He participated in that process, and his objection to the preference accorded to jump height was accepted. The purpose of the reconsideration was to ensure that the rider selected to represent the country was identified in accordance with the prescribed criteria and comparative merit. Selection Decision II cannot be invalidated merely because the ultimate outcome was not in the Appellant's favour.
- 19.15. The decision in *Manjeet* (*supra*) is distinguishable, since it concerned a selection contrary to a binding international qualification system. In the present case, FEI itself clarified, by the e-mail placed before the Selection Committee on 06.08.2026, that a COC only creates a long list, and selection among COC holders is for the country to decide. The Regulations for YOG 2026 govern the competition at the games, not the criteria for national selection.
- 19.16. The assertion that Selection Decision II was intended to exclude the Appellant is misconceived. The Appellant has been placed as Reserve No. 1 and, under Paragraph 5(vii) of the Minutes, the selected rider and both reserve riders are required to continue competing and submitting their results to EFI until the Games, thereby ensuring that the eventual representative remains in suitable form. The Appellant's prayer that he be declared the selected rider is, therefore, untenable.
- 19.17. Accordingly, the present Appeal is liable to be dismissed.



ANALYSIS AND FINDINGS

20. We have heard learned Counsel for the Parties and perused the material placed on record.

21. The principal grievance urged by the Appellant is that Selection Decision II ranked the riders by reference to the number of qualifying performances recorded by each of them, although that consideration finds no express mention in the Selection Criteria notified on 08.05.2026, 10.06.2026 and 10.07.2026. According to the Appellant, the riders ought instead to have been ranked based on the average penalties incurred across the results submitted by them.

22. At the outset, it is necessary to distinguish the notified Selection Criteria from the methodology adopted by the Selection Committee to operationalise those criteria. The Selection Criteria notified on 08.05.2026 required an assessment of the technical difficulty and level of competitions completed, consistency of international performance, recency of results relative to YOG 2026, stability of the horse-rider combination, and championship readiness. The E-mail informed riders holding valid COCs that the final selection would be based on an objective assessment of recent performances, consistency of results, competitiveness at CSI1*/CSI2* events, and overall merit, and required the submission of results by 25.07.2026. The Clarification E-mail confined eligible results to those obtained at CSI1*/CSI2* events at a minimum height of 130 cm. None of these communications prescribed the precise assessment window, the treatment of incomplete or two-phase rounds, or the penalty threshold by which consistency was to be evaluated. The absence of such particulars does not, however, render every subsequently adopted methodology impermissible.



23. The methodology actually adopted by the Selection Committee, as recorded in the Minutes, comprised four components: *first*, an assessment period extending from 08.05.2026 to 25.07.2026, together with the COC result; *second*, equal weightage to results obtained at 130 cm and 135 cm, thereby removing the earlier preference for greater height; *third*, exclusion of two-phase competitions in which only the first phase had been completed; and *fourth*, treatment of a completed round involving not more than eight penalties as a qualifying performance, being the FEI standard for issuance of a COC. This methodology was applied uniformly to all seven COC holders.

24. As regards the assessment period, the Appellant does not dispute the window from 08.05.2026 to 25.07.2026 and has himself relied upon it as the period fixed by the Selection Committee. The E-mail, which informed the riders of their inclusion in the long list and called for the submission of results by 25.07.2026, was itself referable to the criteria published on 08.05.2026. The Appellant participated in that very process, competed at Esposende, Portugal, between 12.07.2026 and 19.07.2026, and submitted those results, together with a performance summary, before the cut-off date. He cannot, therefore, now contend that the assessment period within which he submitted his results was either unknown to him or arbitrarily fixed.

25. As regards the threshold of eight penalties, the same was not introduced for the first time in Selection Decision II. It is the very standard upon which the Appellant relied, both in his Representation and in the submissions advanced before us, wherein it was pleaded that consistency of performance connotes repeatedly low penalties at or below eight points. Having invoked that standard to demonstrate his own consistency, it is not open to the Appellant to contend that its application for determining a



qualifying performance renders Selection Decision II arbitrary. The submission that the threshold pertains exclusively to the eligibility stage is equally unpersuasive, since the Selection Criteria do not preclude reliance upon an established, objective external benchmark for assessing consistency and championship readiness at the selection stage. More significantly, the threshold was applied uniformly to every rider, including the Appellant, whose own 12-penalty result dated 18.07.2026 was excluded on the same basis. A standard applied without exception to all riders cannot be characterised as one-sided.

26. The central contention of the Appellant is that the riders ought to have been ranked by average penalties rather than by the number of qualifying performances. We are unable to accept this contention. Consistency ordinarily denotes the repetition of a prescribed standard of performance across a body of results; it cannot be reduced to an arithmetical average derived from however few results a rider elects to submit. An average based on a limited sample may unduly favour a rider who competes less frequently. We also note that the Appellant's own computation has not remained consistent. In his Representation, he tabulated five results aggregating 22 penalties, yielding an average of 4.4 penalties, which is the very figure he now attributes to Respondent No. 3. Before us, however, he relies upon four results aggregating 14 penalties, yielding an average of 3.5 penalties, after excluding one of his own results. This variation reinforces our conclusion that the average urged by the Appellant is not an objective standard emanating from the Selection Criteria, but a construct advanced to support a particular outcome.



27. The reliance placed upon *Manjeet* (*supra*) and *Chirag Khandal* (*supra*) does not advance the Appellant's case. *Manjeet* (*supra*) concerned a selecting body that departed from a binding international qualification system and thereby assumed the role of a super selector. In the present case, it is undisputed that the FEI itself clarified before the Selection Committee on 06.08.2026 that COCs merely constitute a long list and that selection from amongst COC holders rests with the National Federation. EFI was, therefore, entitled to adopt a reasonable methodology within the framework of the criteria already notified. *Chirag Khandal* (*supra*) proscribes alteration of an existing criterion after commencement of the selection process. Here, the notified criteria of recency, consistency, competitiveness, and overall merit remained unchanged and were applied in Selection Decision II. The assessment period, treatment of jump height, and qualifying threshold were not new criteria superimposed upon the process, but constituted the manner in which the notified criteria were operationalised, uniformly, in respect of all seven riders.

28. The grievance that Selection Decision II was devoid of reasons is not borne out by the record. The Minutes specify the assessment period, the heights and competition formats considered, the treatment of two-phase competitions, and the order of merit, together with the number of qualifying performances recorded by each rider. These particulars constitute an adequate statement of reasons. To the extent that further explanations were advanced for the first time before the learned Single Judge, we agree that Selection Decision II must be tested on the basis of the reasons contemporaneously recorded and not upon reasons subsequently supplied.



Since the Minutes themselves disclose a sufficient basis for the ranking, this principle does not assist the Appellant.

29. As regards the enlargement of the Selection Committee from three members to five, no material has been placed before us to demonstrate that such enlargement contravened any provision of EFI's Interim Constitution. The Appellant has not relied upon any rule which either limits the strength of the Selection Committee or requires its composition to be notified in advance. The enlargement followed the Appellant's own objection in W.P.(C) No. 11935/2026 that the Selection Committee which rendered Selection Decision I had not been properly constituted. The Appellant thereafter participated, through his father, in the proceedings before the reconstituted Selection Committee without raising any objection to its composition. Having sought and participated in the reconsideration, he cannot assail the composition of the Selection Committee merely because the outcome was adverse to him.

30. The principles governing the scope of judicial review in matters of this nature are well settled. This Court in **Anush Agarwalla v. Ad-Hoc Committee for Governance of Equestrian Federation of India and Others**, 2026 SCC OnLine Del 4965, held that it does not sit in appeal over the assessment of an expert selection committee constituted to select sportspersons to represent the country, nor may it substitute its own evaluation of comparative sporting merit for that of the selectors. Interference is warranted only where the selection is shown to be *mala fide*, perverse, or contrary to criteria binding upon the selecting body. The relevant extract from the said decision is reproduced hereunder:



“32. It is well settled that Courts do not sit in appeal over the decisions of selection committees, nor do they reassess the relative merits of candidates. The determination as to who should represent the country in an international sporting event is ordinarily best left to experts in the field. In matters concerning selection for international competitive events, the Court would not ordinarily interfere with the selection criteria framed by the concerned expert body, or with the manner in which relative merit is evaluated, unless the decision is shown to be arbitrary, irrational, perverse or contrary to law.”

31. For the reasons recorded hereinabove, none of these grounds is established. The methodology adopted in Selection Decision II bears a rational nexus to the notified Selection Criteria, was applied uniformly to all seven COC holders, and is supported by reasons recorded contemporaneously.

32. We note that the Selection Criteria did not define the assessment period or the qualifying threshold with precision, and that this lack of specificity has occasioned repeated litigation between the Parties. That circumstance, however, does not alter our conclusion that the selection is not vitiated by any infirmity warranting judicial interference.

33. An athlete representing the country at an international sporting event must possess not only physical ability but also mental and emotional fortitude. It is, therefore, incumbent upon the selecting body to ensure that the selection process does not create avoidable uncertainty for the athletes concerned. Disputes arising from ambiguity in that process may themselves adversely affect an athlete’s preparation for the event. EFI shall, accordingly, ensure that future selection criteria and timelines are framed and implemented with sufficient clarity and precision to obviate disputes of this nature.



34. For the foregoing reasons, we find no merit in the challenge to the Impugned Judgment dated 17.09.2026. The learned Single Judge correctly held that Selection Decision II was neither *mala fide*, arbitrary, perverse, nor contrary to the notified criteria, and rightly declined to interfere therewith.

35. Accordingly, the present Appeal is dismissed. All pending Applications stand disposed of. There shall be no order as to costs.

TEJAS KARIA, J

DEVENDRA KUMAR UPADHYAYA, CJ

SEPTEMBER 24, 2026

N/Sz