



2026:DHC:837



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* IN THE HIGH COURT OF DELHI AT NEW DELHI

% Judgment pronounced on: 02.02.2026+ CONT.CAS(C) 685/2025

SATYA PRAKASH RAVIDAS

.....Petitioner

versus

ALAKH NIRANJAN PRASAD SINGHNA & ORS.Respondents

+ W.P.(C) 13723/2025

SATYA PRAKASH RAVIDAS

.....Petitioner

versus

THE ADM DISTRICT SOUTH & ORS.

.....Respondents

+ W.P.(C) 15987/2025

SATYA PRAKASH RAVIDAS

.....Petitioner

versus

THE REGISTRAR OF SOCIETIES & ANR.

.....Respondents

+ W.P.(C) 16305/2025, CM APPL. 66703/2025, CM APPL. 68682/2025 & CM APPL. 70557/2025

SATYA PRAKASH RAVIDAS

.....Petitioner

versus

UNION OF INDIA & ORS.

.....Respondents

+ W.P.(C) 2902/2025, CM APPL. 19993/2025, CM APPL. 27880/2025, CM APPL. 34624/2025 & CM APPL. 38858/2025

SATYA PRAKASH RAVIDAS

.....Petitioner

versus

SDM HQ REGISTRAR OF SOCIETIES & ANR.

.....Respondents

Presence: Mr. Satya Prakash Ravidas, Petitioner in person in
CONT.CAS(C) 685/2025, W.P.(C) 13723/2025, W.P.(C)
15987/2025, W.P.(C) 16305/2025 & W.P.(C) 2902/2025.



Mr. Jayant Bhushan, Sr. Advocate along with Mr. Anil Dutt, Mr. Yogit Mehra, Mr. Paras Choudhary, Mr. Amartya Bhushan, Ms. Lavi Agarwal, Advocates for Raj Vidya Kender in CONT.CAS(C) 685/2025, W.P.(C) 13723/2025, W.P.(C) 15987/2025, W.P.(C) 16305/2025 & W.P.(C) 2902/2025.

Mr. Ashish K. Dixit, CGSC along with Mr. Umar Hashmi, Mr. Harshit Chitransh and Ms. Iqra Sheikh, Advocates for R-1 to R-5.

Mr. Dhruv Rohatgi, Panel Counsel (GNCTD) along with Mrs. Chandrika Sachdev and Mr. Dhruv Kumar, Advocates for GNCTD in W.P.(C) 16305/2025.

Mr. Dhananjaya Mishra, Mr. Navneet Dogra and Mr. Amritesh Mohanty, Advocates for R-1 in W.P.(C) 2902/2025.

CORAM:

HON'BLE MR. JUSTICE SACHIN DATTA

JUDGMENT

W.P.(C) 13723/2025, W.P.(C) 15987/2025, W.P.(C) 16305/2025 and W.P.(C) 2902/2025

1. Multiple writ petitions have been filed by the petitioner concerning the same society, i.e., Raj Vidya Kender (RVK). Having regard to the overlapping nature of the causes of action and the commonality of issues raised, it is considered appropriate to adjudicate all these petitions together.
2. The petitioner has approached this Court asserting his association with the affairs of RVK, a society registered under the Societies Registration Act, 1860, and formerly known as the Divine United Organisation (DUO). The petitioner has invoked the writ jurisdiction of this Court aggrieved with the current management and functioning of the society. According to the petitioner, there exists an alleged error in the bylaws of RVK, whereby the



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name of a fictitious individual, “Param Hans Sad Guru Dev Sri Sant Ji Maharaj,” has been inserted in place of the real and living individual, Mr. Prem Rawat.

3. It is further submitted that paragraph 3(a) of the bylaws of RVK describes the principal objective of the society as the propagation of the knowledge of “Param Hans Sadgurudev Shri Sant Ji Maharaj,” who, according to the petitioner, is a non-existent person. This alleged error has, in the petitioner’s view, enabled unelected individuals to seize control of the society and exploit it for their personal benefit.

4. The petitioner additionally contends that sub-paragraph 4(d) has been misused to suppress dissent and to insulate alleged offenders from accountability. He claims that key positions within RVK have been usurped by shareholders and employees of certain private entities, including those associated with one Mr. Deepak Raj Bhandari. It is contended that Mr. Deepak Raj Bhandari, a Nepalese national, who exercises unlawful control over RVK has committed a financial fraud of ₹550.30 crores in relation to RVK.

5. It is also the petitioner’s allegation that the purported unelected governing body of RVK fabricated an authorization letter dated 16.04.2019 to initiate false litigation (CS (OS) 470/2019) against him. He further highlights that no balance sheets, election records, or statutory filings of RVK have been submitted before the Registrar of Societies since 2003.

6. The case of the petitioner is that RVK has remained a defunct society since 2003, with no lawful elections to its governing body for more than twenty-two years. The petitioner seeks to fasten admission/s by the Registrar of Societies, on the basis of certain communications, dated 20.11.2023,



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27.09.2023, and 27.05.2024. It is emphasised that the Registrar has the authority to directly intervene and conduct an election for a society if the existing election process is deemed invalid or improperly conducted. It is submitted that the Registrar is vested with powers under Sections 12, 12A, 13, 14, and 19 of the Act to regulate, call for information, and conduct enquiries into the affairs of societies.

7. It is submitted that the prolonged absence of elections and functioning governance renders all subsequent activities of RVK void and illegal. It is pointed that the unelected and unauthorized persons of RVK, have unlawfully sold the Ashram “Prem Bhawan Raj Vidya Kendra, Near Gaya Gumti, Patna. It is pointed that from 1987 onwards, the respondents, in collusion with private individuals are transferring and vesting DUO’s immovable and movable properties into various private companies, trusts, and entities without the sanction of the General Body or compliance with statutory provisions.

8. Another grievance of the petitioner is that the present managing body of RVK is conducting public events, collecting donations, and issuing communications in the name of Shri Prem Rawat, who is not recognized anywhere in the registered Memorandum of Association or bylaws of RVK. It is also emphasised that under the guise of a charitable society unelected and unauthorized persons of RVK are collecting funds without authorization.

9. In W.P. (C) No. 13723 of 2025 the petitioner has also challenged a notice dated 30.07.2025 issued by the First Appellate Authority, intimating that a hearing was scheduled on 21.08.2025. Notice dated 30.07.2025 is reproduced as under –



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OFFICE OF THE ADM / FIRST APPELLATE AUTHORITY
DISTRICT – SOUTH: REVENUE DEPARTMENT
GOVERNMENT OF N.C.T OF DELHI
M. B. ROAD, SAKET, NEW DELHI- 110068

Appeal No. 2405 / FAA/South/2025/1020 - 1021 Dated: 30.07.2025

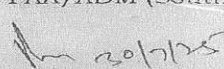
IN THE MATTER OF **SATYA PRAKASH RAVIDASH**
V/s
SPIO / SDM (HQ)

NOTICE

Whereas, the above detailed RTI appeal has been filed in this office by Sh.Satya Prakash Ravidash R/o Flat No.202,Ramratna Niwas Apartment Defence Colony Sainikpuri, Secundrabad, Telanagana -500094 u/s 19 (1) of the Right to Information Act, 2005.

Now, the appeal shall be taken up for hearing on **21/08/2025 at 03:00 P.M.**

The SPIO /SDM (HQ) is hereby required to file a reply to the present appeal within 03 days of the issue of this notice, or, in the alternative, attend the proceedings on the above mentioned date and time, in person or through an authorized representative.

By order's of FAA/ADM (South)

A to FAA/ADM (South)

To,

1. Sh.Satya Prakash Ravidash R/o Flat No.202,Ramratna Niwas Apartment Defence Colony Sainikpuri Secundrabad, Telanagana-500094
2. The SPIO / SDM (H Q), along with a copy of appeal.

10. However, it is submitted that the said notice was dispatched only at 17:01 hours on 21.08.2025, i.e., after the date and time fixed for the petitioner's appearance, and was delivered to him only on 26.08.2025, as reflected in the India Post tracking records (ED5356781671N). It is submitted that this sequence of events clearly evidences mala fides, deliberate administrative delay, and denial of a reasonable opportunity of hearing, thereby vitiating the entire proceedings.

11. It is submitted that prior to this, on 26.04.2025, the Petitioner had filed an RTI application (ID No. 175-TRTI/2025) seeking information regarding one "Udayanand," who is purportedly shown as the Vice-



President of RVK. It is submitted that the said individual, however, is a fictitious person with no known identity, parentage, or existence. It is submitted that to the said RTI application the petitioner received vague and evasive replies dated 02.05.2025 and 18.06.2025, failing to address the core issue of the fictitious nature of “Udayanand,” which raises grave concerns of fraud and manipulation within RVK’s governance structure.

12. Feeling aggrieved with the aforesaid, the petitioner has filed the present batch of petitions.

13. In W.P. (C) no. 2902 of 2025, the petitioner has prayed as under –

*“a) Direct the Respondent No.1 to perform his statutory duty by recording the Petitioner's name as *Caretaker* of *Respondent No.2.* to safeguard its assets and interests. I further request that this arrangement remain in place until a General Body meeting is convened to submit the balance sheet for the last 10 years.*

b) Cancel the sale deed of the Ashram Prem Bhawan Patna executed on 30.11.2024 with immediate effect.”

14. In W.P. (C) no. 2902 of 2025, the petitioner has also filed an amended writ petition, wherein the petitioner has prayed as under –

a) Direct the 1st Respondent to declare the 2nd Respondent as a defunct society based on records available with the 1st Respondent. It is being filed based on the order dated 07.04.2025 in W.P.(C) 2844/2025 passed by this Hon’ble court.

15. In W.P. (C) no. 16304 of 2025, the petitioner has made the following prayers –

“(a) Issue a Writ of Mandamus directing the Respondent authorities, namely the Registrar of Societies (NCT of Delhi) and Station House Officers of P.S. Maidan Garhi (New Delhi) and P.S. Genome Valley (Telangana), to verify the legal status, governing body, and authenticity of the society "Raj Vidya Kender" (formerly "Divine United Organization") before granting or permitting any public events in its name.



(b) Issue a Writ of Prohibition or interim stay on the public events announced as the "125th Anniversary of Hans Jayanti" scheduled on 08-09.11.2025 at Raj Vidya Kender, Shahurpur, New Delhi, and 26.11.2025 at Raj Vidya Kender (South), Turkapally, Telangana, until:

a valid General Body Meeting is duly convened, and

lawful amendment is made replacing the fictitious name "Param Hans Sadgurudev Shri Sant Ji Maharaj" with "Shri Prem Rawat" in the Memorandum of Association.

(c) Direct the Registrar of Societies to conduct an inquiry under Sections 12 and 12A of the Societies Registration Act, 1860, into the legality of the 2003 amendments and the alleged unauthorized collection of funds in the name of Shri Prem Rawat."

16. In W.P. (C) NO. 15987 of 2025, the following prayers have been made –

"(a) Issue a writ, order, or direction in the nature of mandamus directing the Respondents to produce before this Hon'ble Court the resolution(s) passed in the Governing Body meetings of Raj Vidya Kender (RVK), together with all records relating to the erstwhile society Divine United Organisation (DUO) and its subsequent change of name to RVK on 07.07.2003, including full particulars of all immovable and movable properties of DUO that were allegedly transferred, vested, or otherwise dealt with under RVK.

(b). In the alternative, if the Respondents fail, neglect, or refuse to produce such records, this Hon'ble Court may be pleased to direct Respondent No. 1 (Registrar of Societies, NCT of Delhi) to conduct a statutory enquiry under the Societies Registration Act, 1860 into the affairs of Respondent No. 2 (RVK), and to take consequential action, including cancellation of registration, if violations of the Act are established."

17. In W.P. (C) NO. 13723 of 2025, the petitioner has prayed as under –

"a. Issue a writ of 'Mandamus', or any other appropriate writ, order, or direction, commanding Respondent No.3 to convene an urgent General Body Meeting in the presence of the owner of the intellectual property, o Mr. Prem Rawat" which has not been held for the past 22 years, for considering pending court cases and appointment of legal counsel to represent and engagement of advocate to represent Respondent Nop.3.



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b. Issue a writ of 'Certiorari', or any other appropriate writ, order, or direction, quashing the notice dated 30.07.2025 issued by Respondent No.1 along with all consequential proceedings.”

18. Further the petitioner has filed a common synopsis in the present petitions wherein the following submissions have been made by the petitioner –

- i. There exists a complete breakdown of legal governance in the Divine Light Universal Organisation (DUO), now projected as Raj Vidya Kender (RVK). It is submitted that based on the official records produced by the Registrar of Societies on 12.11.2025, it is conclusively established that the original bylaws of DUO unequivocally designate Shri Prem Rawat as the Patron for life. Under the bylaws, only the Patron is empowered to appoint an ad-hoc committee, authorize the Governing Body, or approve any amendment. No person or body is competent to remove or supersede the Patron. It is averred that this single admitted fact fundamentally invalidates the claims of the private individuals who have unlawfully taken over DUO/RVK and have acted as “office bearers” without any lawful authority.
- ii. The Registrar of Societies file, produced before this Court for inspection, demonstrates that DUO has not held a single General Body Meeting for decades and that no resolutions, elections, audited accounts, or filings exist on record. The file does not contain (i) any General Body resolution authorizing an election; (ii) any record of lawful proceedings under the Societies Registration Act; or (iii) any approval of amendments or name



change by the Patron. Consequently, every action undertaken in the name of DUO or RVK, including the purported name change, constitution of any governing body, dealing with society assets, and transactions relating to Patna Ashram, is void ab initio, non est in law, and constitutes fraud upon the statute.

- iii. It is emphasised that the alleged change of name from DUO to “Raj Vidya Kender” on 04.07.2023 is a glaring instance of illegality. It is submitted that the mandatory conditions under the Societies Registration Act and the DUO bylaws, requiring a properly convened General Body Meeting and Patron’s approval, have never been satisfied. Accordingly, the purported name change is absolutely void, confers no legal validity, and cannot vest any authority in those claiming to represent RVK.
- iv. It is pointed that after the unauthorized takeover, the private individuals unlawfully removed the Patron from his rightful position and embarked upon a systematic process of diverting DUO’s charitable assets. They created private companies, transferred DUO properties into such entities, and misappropriated substantial funds.
- v. It is further submitted that the purported sale of the Patna Ashram is void ab initio. DUO/RVK never had a validly constituted Governing Body, nor was there any resolution, authorization, power of attorney, or approval from the Patron permitting sale of any charitable property. The alleged transfer is wholly illegal, ultra



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vires the bylaws, contrary to statute, and incapable of conferring rights upon any purchaser irrespective of the alleged consideration.

vi. The petitioner further submitted that DUO's charitable properties, including the Patna Ashram and other assets across India, were created from public donations for religious, spiritual, educational, and public-benefit purposes. These assets cannot be treated as the private property of individuals. Misappropriation or alienation of such property is a matter of public trust, and this Court, in exercise of its jurisdiction under Article 226, is empowered and obligated to preserve the status quo ante to prevent irreversible harm to charitable property.

19. In the said common synopsis, the petitioner has further prayed as under –

IV. PRAYER BEFORE THIS HON'BLE COURT

In view of the ROS record and illegal actions of the respondent individuals, the Petitioner respectfully prays that this Hon'ble Court may be pleased to:

1. Declare that DUO continues to exist strictly as per its original bylaws with Shri Prem Rawat as the lawful Patron for life.
2. Declare that the name-change to "Raj Vidya Kender" (04.07.2023) is void ab initio, having no legal basis.
3. Restore the Patna Ashram property to its original position (status quo ante), as the sale/transfer was executed without authority or any valid resolution.
4. Stay all further alienation, mutation, transfer, construction, demolition, or encumbrance of any property claimed through the illegally constituted "RVK".
5. Take judicial notice that the society has remained defunct for decades and is in continuous violation of statutory requirements.
6. Direct a full inquiry into the misuse of a defunct society's name for property transactions, private gain, and misleading this Hon'ble Court. The Petitioner submits that he seeks no personal benefit but only protection of charitable property and enforcement of law.

20. On the other hand, while controverting to the aforesaid contentions of the petitioner RVK has submitted as under -



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- i. In 1977, a society named Divine United Organisation (DUO), applied for registration under the Societies Registration Act, 1860. The application, submitted on 20.05.1977, enclosed the proposed Memorandum of Association (MOA) and Rules and Regulations.
- ii. Under the original Rules and Regulations, Param Hans Sadguru Dev Shri Sant Ji Maharaj @ Balyogeshwar @ Shri Prem Pal Singh Rawat (popularly known as Shri Guru Maharaj Ji) was designated as 'Patron' and was to hold the position for life. The society recognized three categories of membership, Patron, Life Member, and Ordinary Member.
- iii. Upon objections by the Registrar of Societies, DUO submitted an amended MOA and Rules on 26.09.1977. The amendments removed the 'Patron' category, limited membership to Life and Ordinary Members, and altered the registered office. DUO was thereafter registered on 31.10.1977, with its aims and objects remaining substantially unchanged.
- iv. In 2003, pursuant to majority approval of the Governing Body, DUO amended its MOA and changed its name to Raj Vidya Kender (RVK). It is submitted that the amendments followed four special general body meetings held on 02.08.2002, 08.09.2002, 04.10.2002 and 10.12.2002.
- v. It also emphasised that the Registrar of Societies has acknowledged that RVK regularly filed its Annual Governing Body lists under Section 4 of the Act at least until 2019. It is submitted that filings



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have continued up to 2025 and that elections are conducted every five years, the latest having taken place in 2024.

- vi. The principal objective of RVK remains the propagation of the teachings of Mr. Prem Rawat, an internationally known speaker and author. References to “Param Hans Sadguru Dev Shri Sant Ji Maharaj” in the Rules and Regulations pertain to Mr. Prem Rawat.
- vii. It is also pointed that a separate entity, Raj Vidya Kender (South), is a registered trust in Chennai. It is distinct from RVK (Delhi) and has no overlapping trustees or governing body members.
- viii. It is further submitted that due to the petitioner’s involvement in illegal and anti-social activities, the Petitioner was blacklisted from entering RVK premises from 14.01.2014. The case of the RVK is that the petitioner has no locus to file petitions concerning RVK, as he is neither a member nor affiliated with the society.
- ix. It is submitted that RVK has filed a defamation suit (CS(OS) 470/2019) against the petitioner. An interim stay order was passed on 19.07.2023 and subsequently made absolute on 10.04.2024. The suit remains pending.
- x. The petitioner has thereafter filed multiple writ petitions and applications against RVK on overlapping grounds. It is submitted that a recent habeas corpus petition (W.P.(Crl.) 2399/2025) was dismissed by the Division Bench on 09.09.2025.



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- xi. It is averred that Courts have repeatedly noted that the petitioner files frivolous and repetitive petitions without disclosure of prior proceedings.
- xii. It is further submitted that Section 13 of the Societies Registration Act, 1860 bars the writ jurisdiction of this Court over private disputes concerning management of a registered society, for which civil remedy is prescribed.
- xiii. It is contended that the petitioner has alleged that Mr. Udayanand is a fictitious person. It is submitted that this is factually incorrect. Mr. Udayanand is currently the Vice-President of the Society. It is further submitted that the petitioner has not disclosed the fact that a similar plea has been dismissed by a Coordinate Bench of this Court in W.P.(Crl.) 2714/2025 *vide* order dated 28.08.2025.
- xiv. It is also submitted that the petitioner alleges that Mr. Deepak Raj Bhandari has siphoned crores of money from the Society. It is submitted that an identical plea was raised in IA no. 7752 of 2025 filed in CS (OS) 470/2019 which was dismissed *vide* order dated 25.03.2025 and the petitioner was warned from filing such frivolous application. This fact not been disclosed
- xv. Lastly it is the case of RVK that the Petitioner is a habitual litigant who repeatedly abuses judicial process, as recognized in several orders. In order to substantiate its case reliance has been placed on the judgment of the Supreme Court in ***Pandurang Vithal Kevne v. BSNL & Anr.***, 2024 SCC OnLine SC 4108.



21. During the course of arguments, the Registrar of society has submitted as under -

- i. It is submitted that the reliefs sought pertain to the internal management and private disputes concerning a society registered under the Societies Registration Act, 1860 (“the Act”). Matters relating to the governance, control, and administration of a registered society are essentially private law disputes, for which appropriate civil remedies are available.
- ii. It is submitted that the statutory framework under the Act is narrow and circumscribed. Under Section 3 of the Act, the Registrar has a function of registering a society upon filing of a memorandum of association referable to Sections 1, 2, and 20 of the Act. Under Section 4, the limited role of the Registrar is to receive the annual list of the managing body of a registered society. Under Section 12A (as applicable to Delhi), when there is any change in name of the Society after following the procedure prescribed in Section 12 of the Act, the proposition of change in name is required to be filed with the Registrar for change in name. In terms of Section 12 (2), the Registrar has to apply its mind as to whether the proposed name is identical or similar to any other existing society.
- iii. It is further emphasised that the facts relevant to the present case indicate that the society in question was registered under the name “Devine United Organisation” on 31.10.1977 under Section 3 of the Act, and subsequently changed its name to “Raj Vidya



Kender” on 07.07.2003 in accordance with Sections 12 and 12A. The last annual list of the governing body was filed on 30.01.2019.

iv. It is submitted that this Court has consistently held that the Registrar of Societies does not possess supervisory, disciplinary, or regulatory powers over the internal affairs of societies registered under the Act. Reliance has been placed on order dated 12.04.2012 passed in ***Supreme Court Bar Association (Regd.) v. Registrar of Societies & Ors.***, W.P.(C) 3260/2010, ***Dinesh Kumar v. Registrar of Societies***, 2011 SCC OnLine Del 2814, and ***Hua Seng Chew v. Registrar of Societies and Firms***, W.P.(C) 8604/2020.

v. It is submitted that registrar of societies is merely a registering authority and has no jurisdiction to interfere in the management, functioning, or internal affairs of a registered society. Any grievance relating to administration, membership, meetings, elections, or property of the society is required to be adjudicated before the competent civil court.

ANALYSIS AND CONCLUSION

22. Having heard both the parties, this Court is of the view that the grievance/s of the petitioner cannot be adjudicated in exercise of jurisdiction under Article 226 of the Constitution of India.

23. It is a well-settled position of law that disputes relating to the internal management of a society must be adjudicated before a competent civil court and cannot be adjudicated in writ jurisdiction. In ***Dinesh Kumar & Anr. v. The Registrar of Societies & Ors***, 2011 SCC OnLine Del 2814, the Court



has categorically held as under –

“4. The counsel for the respondent No. 1 Registrar of Societies appearing on advance notice states that the Registrar under the Societies Registration Act has no power in the matter and is not in a position to decide the inter se disputes between the Members and the Management of the Society. It is stated that the Registrar is only a registering authority and is not empowered to approve or disapprove any amendment or to take any action with respect to any irregularities.

5. The counsel for the petitioner has also not been able to show any duty or obligation under the law upon the Registrar of Societies to take any action and which it may be failing to perform or take. Without the petitioners showing that there is any denial to perform the obligation or duty required to be performed in law, no mandamus can be claimed.

*6. Besides the aspect of delay, which has not been satisfactorily explained, **I am also of the view that the writ petition qua the inter se disputes of Members and the Management of the Society does not lie.** The earlier writ petition preferred for the same relief though by others was also withdrawn with liberty to seek appropriate relief. The rejection of the plaint in the suit preferred thereafter was as barred by limitation. If the plaintiffs in the suit are aggrieved from the said finding, they are to seek remedies against the said judgment and cannot again maintain a writ petition. I may also notice that the challenge to the amendment is inter alia on the ground that the notice preceding the meeting in which the amendments were carried out was defective. **The said plea raises a disputed question of fact which in any case cannot be adjudicated in writ jurisdiction.**”*

24. The petitioner has also raised objections concerning the functioning of the Registrar of Societies and has asserted that the Registrar is vested with authority under Sections 12, 12A, 13, 14, and 19 of the Societies Registration Act, 1860 to regulate and conduct inquiries into the affairs of registered societies.

25. At this juncture, it is relevant to note that in an earlier order dated 19.05.2025 passed in CM APPL.22817/2025 in W.P.(C) 2902/2025, the



submissions made on behalf of the Registrar of Societies were duly recorded, wherein the Registrar categorically stated that there was nothing amiss in the affairs of the concerned society. In view thereof, the interim order dated 07.03.2025 was vacated. The relevant portion reads as under:

“9. Considering the aforesaid circumstances, particularly the submission of learned counsel for the respondent no. 1 that there is nothing amiss about the state of affairs of the concerned society, the interim order dated 07.03.2025 is vacated.”

26. Further, the Registrar of Societies has taken a stand that it lacks jurisdiction over the society’s internal functioning and that its statutory role is confined to registration and maintaining basic records.

27. In order to deal with the contentions raised by the petitioner regarding the scope and extent of powers of the Registrar of Societies, particularly the assertion that the Registrar is empowered under Sections 12, 12A, 13, 14, and 19 of the Societies Registration Act, 1860 to regulate and inquire into the internal affairs of societies, this Court deems it appropriate to first examine the relevant statutory provisions. The said provisions are reproduced as under -

“12. Societies enabled to alter, extend, or abridge their purposes.—
Whenever it shall appear to the governing body of any society registered under this Act, which has been established for any particular purpose or purposes, that it is advisable to alter, extend, or abridge such purpose to or for other purposes within the meaning of this Act, or to amalgamate such society either wholly or partially with any other society, such governing body may submit the proposition to the members of the society in a written or printed report, and may convene a special meeting for the consideration thereof according to the regulations of the society;

but no such proposition shall be carried into effect unless such report shall have been delivered or sent by post to every member of the society ten days previous to the special meeting convened by the governing body for the consideration thereof, nor unless such proposition shall have been agreed to by the votes of three-fifths of the members delivered in person or by proxy, and confirmed by the votes of three-fifths of the members



present at a second special meeting convened by the governing body at an interval of one month after the former meeting.

12-A. Registration of change of name.—(1) Where a proposition for change of name has been agreed to and confirmed in the manner prescribed by Section 12, a copy of the proposition so agreed to and confirmed shall be forwarded to the Registrar for registering the change of name. If the proposed name is identical with that by which any other existing society has been registered, or in the opinion of the Registrar so nearly resembles such name as to be likely to deceive the public or the members of the either society, the Registrar shall refuse to register the change of name.

(2) Save as provided in sub-section (1), the Registrar shall, if he is satisfied that the provisions of this Act in respect of change of name have been complied with, register the change of name and issue a certificate of registration altered to meet the circumstances of the case. On the issue of such a certificate the change of name shall be complete.

(3) The Registrar shall charge for any copy of a certificate issued under sub-section (2), a fee of rupee one or such large fee and exceeding rupees five as the State Government may from time to time, direct; and all fees so paid shall form part of the Consolidated Fund of India.

13. Provision for dissolution of societies and adjustment of their affairs.—Any number not less than three-fifths of the members of any society may determine that it shall be dissolved, and thereupon it shall be dissolved forthwith, or at the time then agreed upon, and all necessary steps shall be taken for the disposal and settlement of the property of the society, its claims and liabilities, according to the rules of the said society applicable thereto, if any, and, if not, then as the governing body shall find expedient, provided that, in the event of any dispute arising among the said governing body or the members of the society, the adjustment of its affairs shall be referred to the principal Court of original civil jurisdiction of the district in which the chief building of the society is situate; and the Court shall make such order in the matter as it shall deem requisite:

Provided that no society shall be dissolved unless three-fifths of the members shall have expressed a wish for such dissolution by their votes delivered in person, or by proxy, at a general meeting convened for the purpose:

Provided that [whenever any Government] is a member of, or a contributor to, or otherwise interested, in any society registered under



this Act, such society shall not be dissolved [without the consent of the Government of the State of registration].

14. Upon a dissolution no member to receive profit.—If upon the dissolution of any society registered under this Act there shall remain after the satisfaction of all its debts and liabilities any property whatsoever, the same shall not be paid to or distributed among the members of the said society or any of them, but shall be given to some other society, to be determined by the votes of not less than three-fifths of the members present personally or by proxy at the time of the dissolution, or, in default thereof, by such Court as aforesaid:

Clause not to apply to Joint-stock Companies.—Provided, however, that this clause shall not apply to any society which shall have been founded or established by the contributions of shareholders in the nature of a Joint-stock Company.

19. Inspection of documents. Certified copies.—Any person may inspect all documents filed with the Registrar under this Act on payment of a fee of one rupee for each inspection; and any person may require a copy or extract of any document or any part of any document, to be certified by the Registrar, on payment of two annas for every hundred words of such copy or extract; and such certified copy shall be prima facie evidence of the matters therein contained in all legal proceedings whatever.”

28. It is also relevant to advert to Sections 3 and 4 of the Societies Registration Act, 1860, which are as under:-

“3. Registration and fees.—Upon such memorandum and certified copy being filed, the Registrar shall certify under his hand that the society is registered under this Act. There shall be paid to the Registrar for every such registration a fee of fifty rupees, or such smaller fee as [the State Government] may, from time to time, direct; and all fees so paid shall be accounted for to [the State Government].

4. Annual list of managing body to be filed.—Once in every year, on or before the fourteenth day succeeding the day on which, according to the rules of the society, the annual general meeting of the society is held, or, if the rules do not provide for an annual general meeting, in the month of January, a list shall be filed with the Registrar of Joint-stock Companies, of the names, addresses and occupations of the governors, council, directors, committee, or other governing body then entrusted with the management of the affairs of the society.”

29. A perusal of the above mentioned provisions makes it abundantly



clear that the Societies Registration Act, 1860 does not confer upon the Registrar of Societies any supervisory, adjudicatory, or disciplinary authority over the internal affairs of registered societies.

30. Under Section 3 of the Act, the limited function of the Registrar as that of registering a society upon submission of its Memorandum of Association, while Section 4 merely casts a statutory obligation upon the concerned office-bearers to file an annual return before the Registrar of Societies, setting out the names, addresses, and occupations of the governors, council, directors, committee, or other governing body then entrusted with the management of the affairs of the society.

31. In **Supreme Court Bar Association (Regd.) v. Registrar of Societies & Ors.**, 2012:DHC:2422, this Court has categorically observed as under -

*“12. Section 4 of the Act casts a duty on the persons concerned to file an annual return before the ROS containing the names, addresses and occupation of the members of the Executive Committee. But the law does not provide for any contingency- much less for the suspension or dissolution of the society because of failure to comply with Section 4. The conclusion drawn by the ROS, that if a return is not filed in terms of Section 4 of the Act, the society is liable to be suspended or dissolved, or that its existence becomes illegal is, to say the least, outrageous and unfounded. **The Act does not vest any control or supervisory or disciplinary power or jurisdiction in the ROS to take action against a society registered under the Act. The disputes in relation to a society registered under the Act would, necessarily, have to be taken before, and resolved by the Civil Court. This is also evident from Sections 13 and 14 of the Act, which provide for resolution of issues dealt with therein by the Court.**”*

32. Further, the scope of interference by the Registrar under Sections 12 and 12A of the Act has also been conclusively settled. In **Sunil Agarwal and Ors. v. Govt. of NCT Of Delhi And Ors.**, 2024:DHC:6515, this Court has made the following observation -



“13.....At the same time, the Registrar of Societies in their Counter Affidavit have also explicitly acknowledged that it does not have jurisdiction over internal affairs of a registered society and their role is limited up to registration of a society. They have also categorically confirmed that they can neither decide, doubt or dispute regarding the election of a society nor interfere in the dispute between the members of the society.

14. Thus, in light of the explicit stand taken by Registrar of Societies, relating to its jurisdiction, we have to examine whether the Registrar’s reliance on Section 12 of the Act to reject the amendments to the MoA has a legal foundation. Section 12 of the Act reads as follows:

12. Societies enabled to alter, extend or abridge their purposes.— Whenever it shall appear to the governing body of any society registered under this Act, which has been established for any particular purpose or purposes, that it is advisable to alter, extend, or abridge such purpose to or for other purposes within the meaning of this Act, or to amalgamate such society either wholly or partially with any other society, such governing body may submit the proposition to the members of the society in a written or printed report, and may convene a special meeting for the consideration thereof according to the regulations of the society; but no such proposition shall be carried into effect unless such report shall have been delivered or sent by post to every member of the society ten days previous to the special meeting convened by the governing body for the consideration thereof, nor unless such proposition shall have been agreed to by the votes of three-fifths of the members delivered in person or by proxy, and confirmed by the votes of three-fifths of the members present at a second special meeting convened by the governing body at an interval of one month after the former meeting.”

[Emphasis Supplied]

15. Elucidating on the scope of Section 12 of the Act, the Division Bench of this Court in Dushyant Sharma v. Haryana Wrestling Association & Ors, has observed that Section 12 of the Act enables a society to alter or amend its objects and purpose and does not extend to registering any amendment in Rules and Regulations of the society. Additionally, in Supreme Court Bar Association v. B.D. Kaushik, 5 the Supreme Court observed that rules relating to the exercise of the right to vote and contest elections do not amount to altering, amending, or



changing the aims and objects of the society and can be implemented without the consent of the Registrar, as provided in the Act.

16. In light of the above, it is clear that the Registrar of Societies does not have supervisory powers over the affairs of the society and we must now consider whether the Petitioner's prayer can be granted.

17. In the opinion of the Court, Registrars' reliance on Section 12 of the Act is misplaced. The provision specifically addresses situations where the governing body of a society seeks to alter, extend, or abridge the society's 'purposes'—essentially a change in the objectives or mission of the society. It is intended to regulate changes that would affect the very character and goals of the society, requiring a higher threshold of approval from the members to ensure that such changes are genuinely in the society's best interests. In contrast, the matter before the Court pertains merely to a change in the composition of the governing body members, amendment of MoA and by-laws and not a change in the society's core purposes. Respondent No. 3 society was established with the purpose of establishing educational institutions, and this purpose has remained the same. Therefore, any amendments in the constitution of the governing body would not trigger Section 12 of the Act.

18. Furthermore, the Registrar of Societies does not have the authority under Section 12, or any other provision of the Act, to intervene in the internal affairs of the society, such as the election or appointment of governing body members, unless it involves a statutory violation. The communication dated 02nd November, 2020, issued by the Registrar, indicates that the Registrar has assumed the role of an adjudicatory body and questioned the changes in the governing body, which is beyond the scope of powers conferred on them by the Act. Furthermore, a society is entitled to have its own rules and regulations, which constitute a contract among its members. Although these rules must be registered under the Act, they do not acquire a statutory character, and the authority to amend, vary, or rescind such rules rests with the general body of the society's members. The society's internal governance, including changes in the governing body, is governed by its own rules, subject to compliance with the Act, but not under the purview of Section 12, which strictly pertains to changes in the society's purposes.

19. That apart, the contention of the Registrar of Societies that the relevant documents pertaining to the amendment in the MoA and by-laws were not provided, and therefore the communication dated 13th June, 2018 could not be taken on record under Section 12 of the Act, is thus not sustainable. There is no provision of law cited by the



Registrar to substantiate this contention. The Societies Registration Act does not empower the Registrar to impose additional procedural requirements beyond those prescribed by the Act itself. The Registrar's demand for such documentation appears to be an overreach of authority, as there is no statutory basis for requiring these specific documents to validate an amendment in the rules and regulations of a society already registered under the Act. Therefore, the Registrar's insistence on such documentation is without legal foundation and cannot sustain.

20. In light of the foregoing, the Registrar's impugned actions are ultra vires the Act. The controversy arising from the communication dated 28th July, 2023, issued in response to an RTI application filed by Mr. Sanjay Kumar Khemka, needs to be addressed. In this communication, the Registrar of Societies disregarded the earlier communication dated 13th June, 2018 and instead relied on previous records to assert that the composition of the society's governing body remains unchanged. Given this inconsistency, the communication dated 28th July, 2023 must be disregarded.

21. That said, it must be clarified that the observations made by this court are only for the purpose of creating an interim arrangement, till such time, the Civil Court in Civil Suit No. CS SCJ No. 313/24, 6 takes a final view in the matter relating to the legality of the meeting dated 13th June, 2018. As can be noted from the prayers sought in the Civil Suit preferred by the intervenors, the minutes dated 13th June, 2018 and the resolutions passed therein, have been impugned as void ab initio and non est in law. The resolution of these issues falls squarely within the jurisdiction of the Civil Court, which must adjudicate the validity of the meeting and the decisions taken therein. The final decision of the Civil Court will be binding on the Registrar of Societies/Respondent No.2 and will determine the legitimacy of the governing body's composition as recognized on 13th June, 2018. Therefore, it is reiterated that the observations made by this Court are limited to assessing the jurisdiction and actions of the Registrar of Societies and should not be construed as reflecting any opinion on the validity of the minutes of the meeting dated 13th June, 2018. These issues remain within the purview of the civil court."

33. In **Employees Welfare Forum & Ors. v. Registrar Of Societies Central & Ors.**, 2024:DHC:8242, this Court has observed as under -

"6. The stand taken by the Registrar of Societies is in consonance with the view taken by this Court in several decisions. In Maheshwari Mandal (Delhi) v. The State of Delhi & Ors. after examining the



scheme of the Societies Registration Act, the Court conclusively held that on a plain reading of Sections 12, 12A, 12B and 12C of the Societies Registration (Delhi Amendment) Act, 1954, 7 in conjunction with Section 3 of the Societies Registration Act, does not empower the Registrar of Societies to adjudicate any issues with regard to the amendment of any purpose or object of the society. The relevant portion of the said judgment is as follows:

“7. It is apparent from the plain reading of the sections 12, 12A, 12B and 12C of the Act read with section 3 of the Act that the Registrar does not have any power to adjudicate any issues with regard to the amendment of any purpose or object of the society. However, in terms of Section 12A of the Act, the Registrar has the power to review registration of the change in name of a society if in its opinion the same resembles or is identical to the name of any existing society.

8. At this stage it is also relevant to mention that a Division Bench of this Court in *Dushyant Sharma v. Haryana Wrestling Association & Ors*: LPA No. 18/2012, decided on 10.01.2012 had observed that section 12 of the Act enabled a society to alter or amend its objects and purpose and did not extend to registering any amendment in Rules and Regulations of the society.

9. The learned counsel appearing for the respondent was also unable to point out any provision in the Act which empowers the Registrar to perform any adjudicatory function in respect of the disputes raised by the petitioner.

10. Mr Abhinav Vasisht, learned Senior Advocate appearing for the petitioner also pointed out that where ever the State Legislatures intended the Registrar to perform any adjudicatory function, the State Legislatures had enacted express provisions in that regard. He referred to the provisions of Section 12D of the Act as applicable in the State of Uttar Pradesh. The said section reads as under:-

“12D. Registrar's power to cancel registration in certain circumstances.-(1) Notwithstanding anything contained in this Act, the Registrar may, by order in writing, cancel the registration of any society on any of the following grounds:-
(a) that the registration of the society or of its name or change of name is contrary to the provisions of this Act or of any other law for the time being in force; (b) that its activities or proposed activities have been or are or will be subversive or the objects of the society or opposed to public policy; (c) that the registration or the certificate of renewal



has been obtained by misrepresentation of fraud.”

11. This Court finds much merit in the aforesaid contentions advanced on behalf of the petitioner. Plainly, the Act as applicable to Delhi does not include any provision which entitles the Registrar to cancel a registration once the same has been granted. As stated above, there is also no provision which empowers the Registrar to examine and adjudicate any dispute with regard to any alleged irregularity in the procedure adopted by the society to amend its Rules and Regulations.”

7. Having regard to the scheme of the Societies Registration Act, this Court concurs with the legal position set out in the afore-noted decision. Significantly, this pertinent issue was not brought to the notice of the Court at the first instance. No doubt, the impugned order was passed in compliance with the directions issued by this Court, nonetheless, it still suffers a jurisdictional error. Further, though the present petition does not specifically challenge the order dated 15th February, 2016, it is evident that the said order also delves into the issue of the validity of amendments—an adjudication that falls beyond the jurisdictional competence of the Registrar. Therefore, both the impugned order and the previous order dated 15th February, 2016, are vitiated by a jurisdictional error and are consequently liable to be set aside.

8. In light of the foregoing, this Court is of the considered view that the appropriate remedy for the two factions of the governing body of JNNYC, who are vying for control of its management, by questioning the amendments to MoA, lies with the Civil Court of competent jurisdiction. The Registrar of Societies could not have rendered any opinion as he lacked jurisdiction.”

34. The legal position therefore stands crystallized as under :-

- i. The Registrar of Societies is not vested with authority under Section 12 or any other provision of the Act to intervene in the internal affairs of a registered society, except in cases involving a clear statutory violation. Even under Section 12A of the Act, the Registrar’s jurisdiction is narrowly circumscribed and is confined solely to examining the registration of a proposed change of name, and that too



only where such name is identical with or deceptively similar to the name of an existing society.

ii. Disputes concerning the affairs of a society registered under the Act must necessarily be instituted before and adjudicated by a competent civil court, as reinforced by Sections 13 and 14 of the Act and the consistent judicial precedents on the issue.

iii. Writ jurisdiction cannot be invoked to resolve such disputes, nor can mandamus be issued in absence of a statutory duty owed by the Registrar.

35. In view of the aforesaid settled position of law, the reliefs sought by the petitioner, which squarely impinge upon the internal affairs of the concerned society, are not maintainable under Article 226 of the Constitution of India. Issues as regards the petitioner's claim to be named as caretaker of RVK; challenges to the sale deed of Patna ashram property; alleged irregularities in alienation, mutation, transfer, construction or demolition of properties; allegations of fictitious membership, or claims that the society has become defunct, are all matters concerning the internal affairs of the society. Any grievance in respect thereof can only be examined by a competent civil court having jurisdiction.

36. Thus this Court has no jurisdiction to adjudicate upon the said issues. The petitioner is, however, at liberty to avail appropriate civil remedies in accordance with law for redressal of the grievances raised.

37. As regards prayer (b) of W.P.(C) 13723/2025, which pertains to the impugned notice dated 30.07.2025 issued by the First Appellate Authority, this Court has considered the petitioner's grievance that the said notice was



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dispatched only at 17:01 hours on 21.08.2025, after the date and time fixed for his appearance, and was in fact delivered to him only on 26.08.2025. In these circumstances, this Court considers it appropriate to direct the concerned authorities to reconsider the matter, after affording him a proper opportunity of being heard.

38. Further, with regard to prayer (a) in W.P.(C) No. 15987 of 2025, wherein the petitioner seeks directions to the registrar of societies to place before this Court the resolutions purportedly passed in the Governing Body meetings of Raj Vidya Kender (RVK), along with all records pertaining to the erstwhile society, Divine United Organisation (DUO), and its subsequent change of name to RVK, including complete particulars of all movable and immovable properties of DUO allegedly transferred, vested, or otherwise dealt with under RVK, this Court notes that Section 19 of the Societies Registration Act, 1860 expressly entitles any person to inspect documents filed with the Registrar under the Act and to obtain certified copies or extracts thereof.

39. It is, therefore, open to the petitioner to seek inspection and certified copies of such documents as are available on record with the Registrar of Societies. However, this Court cannot issue directions to the Registrar of Societies, NCT of Delhi, to conduct an inquiry into the affairs of RVK or to take consequential actions such as cancellation of registration (prayer b in W.P.(C) No. 15987 of 2025).

40. The present petitions are disposed of in the aforesaid terms. It is clarified that nothing stated herein shall be construed as an expression of opinion on the merits of the petitioner's allegations. The Registrar of Societies shall, however, continue to ensure regulatory oversight and



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compliance with the Societies Registration Act, 1860 strictly within the statutory framework.

41. All the other applications filed by the petitioner including CM APPL.38858/2025 in W.P.(C) 2902/2025 also stand disposed of.

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42. The present petition has been filed by the petitioner seeking the following reliefs.

PRAYER :

In view of above facts and circumstances it is most respectfully prayed that this Hon'ble court may graciously may be pleased to :

- a) initiate Contempt Proceeding against Respondents/ Contemnors for violation order dated 07.03.2025 in WP (c) No. 2902/2025 passed by this Hon'ble court.
- b) Pass any other or further order/direction which this Hon'ble Court deems fit and proper to meet the ends of justice.

43. *Vide* order dated 07.03.2025 passed in W.P. (C) 2902 of 2025, this Court had issued the following directions –

1. Issue notice to the respondents, on necessary steps being taken by the petitioner, through all permissible modes, including electronically. Dasti in addition.
2. Let the notice indicate that reply be filed by the respondents within a period of three weeks from the receipt of notice. Rejoinder thereto, if any, be filed within a period of one week thereafter.
3. List on 21.04.2025.
4. In the meantime, status quo shall be maintained as regards the immoveable properties of the respondent no.1.

44. Subsequently, CM APPL. 22817/2025 was filed by Raj Vidya Kender seeking vacation of the *ex parte ad-interim status quo* order granted on



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07.03.2025. After hearing the parties, the said application was allowed, and the *status quo* order operating in favour of the petitioner was vacated vide order dated 19.05.2025. The order dated 19.05.2025 is reproduced as under

—

1. This is an application seeking vacation of directions contained in the order dated 07.03.2025, wherein, it has been, *inter alia*, directed that the respondent no.1 shall maintain status quo as regards the immoveable properties of the respondent no.1.

2. Learned counsel for the respondent no.2/ Raj Vidaya Kender society (Red. No. 8845/1977) submits that the petitioner is guilty of concealment of the material facts in the present petition and the concerned society has been existing for a long period of time and is quite reputed.

3. He submits that affairs of the respondent no.2 have been conducted in a manner which is perfectly consistent with law and in compliance with the requirements of the Societies Registration Act, 1860.

4. He draws attention to other previously instituted litigations between the petitioner and the respondent no.2, wherein, strong observations have made by this Court as regards the conduct of the present petitioner. In particular, attention is drawn to the judgment dated 17.04.2025 in W.P.(CRL) 3931/2024 passed by a co-ordinate Bench of this Court, in which, it has been found that the petitioner has made reckless allegations against the Advocate who appeared against him on behalf of the respondent no.2. Findings have been rendered as regards the conduct of the petitioner and as regards suppression of material facts.

5. Importantly, attention is drawn to a communication dated 19.03.2025 addressed by the petitioner in the aftermath of the aforesaid order dated 07.03.2025 passed by this Court wherein it has been stated as under:-

“NOTICE TO ALL CONCERNED MEMBERS OF RVK SOCIETY

*To: All Concerned Members of RVK Society
Date-19.03.2025*

*Re: Maintenance of Status Quo regarding Immovable
Property of RVK Society*



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This is to inform you that the Hon'ble Delhi High Court has passed an order dated 7.3.2025, in W.P. (c) No. 2902/2025 directing that the status quo be maintained with regards to the immovable property of RVK Society.

In accordance with the Court's order, it is hereby notified that:

- The immovable property of RVK Society shall remain in its current state, and changes or alterations shall be made thereto.*
- No transfer, sale, or alienation of the immovable property shall be permitted until further orders from the Court.*
- All members of the Society are directed to comply with the Court's order and maintain the status quo.*

Please take note of this important development and ensure compliance with the Court's directives.

Sd/-

Sincerely,

Satya Prakash Ravidas

*Through Petitioner in Person W.P.(c) No.2902/2025
Pursuant to the dated 7.3.2025 in W.P. (c) No.2902/2025 of
the Hon'ble Court, I am hereby deemed to be the caretaker of
RVK."*

6. As such, the petitioner has sought to project the interim order to imply that he has been appointed as the caretaker of the respondent no.2. The same clearly amounts to a mischievous misrepresentation thereof.

7. Learned counsel for the Registrar of Societies/respondent no.1 also points out that the petitioner has filed multiple petitions with regard to the respondent no.2 making vague and frivolous allegations having no merit at all. He points out that the Registrar has duly disposed of the representation/s of the petitioner in terms of the previously instituted petition filed by the petitioner before the Telangana High Court being Writ Petition No.: 8685 of 2024.

8. Learned senior counsel for the respondent no.2 also draws attention to a communication addressed by the respondent no.2 to the respondent no.1 on 02.01.2025, wherein, it is recorded that the elections of the respondent no.2 were duly held on 10.12.2024 and the concerned office-bearers were duly elected.



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9. *Considering the aforesaid circumstances, particularly the submission of learned counsel for the respondent no. 1 that there is nothing amiss about the state of affairs of the concerned society, the interim order dated 07.03.2025 is vacated.*

10. *However, while vacating the interim order, it is made clear that all rights and contentions of the petitioner are left open to be considered at the time of final disposal of the writ petition, on the next date of hearing.*

11. *The application stands disposed of.”*

45. In view of the above, once the very order that forms the foundation of the present contempt petition stands vacated, and in view of dismissal of W.P.(C) 2902/2025, no cause for contempt survives. Consequently, the petition is dismissed.

SACHIN DATTA, J

FEBRUARY 2, 2026/sv