

BEFORE THE HON'BLE JUSTICE MR. JASPAL SINGH (RETD.),
THE OMBUDSMAN-CUM-ETHICS OFFICER, PUNJAB CRICKET
ASSOCIATION, I.S. BINDRA STADIUM, SECTOR-63, SAS
NAGAR (MOHALI), PUNJAB.

e-mail: ombusdman@cricketpunjab.in

Complaint No. _____ of 2026

MEMO OF PARTIES

Rakesh Saini s/o Sh.Didar Singh Saini, Vice President, Ludhiana District Cricket Association (LDCA) and Life Member of the Punjab Cricket Association (PCA), House No. 10061, Ward No. 28, Joshi Nagar, Haibowal Kalan, Ludhiana, Punjab.

Complainant

Versus

Punjab Cricket Association (PCA), Through its President/Secretary, IS Bindra Stadium, Sector-63, SAS Nagar, Mohali, Punjab.

Respondent

**COMPLAINT AGAINST RESPONDENT REGARDING
FAILURE TO CONDUCT ELECTIONS OF LUDHIANA
DISTRICT CRICKET ASSOCIATION (LDCA),
CONTINUATION OF AD-HOC ADMINISTRATION AND
FOR DE-AFFILIATION OF LDCA EXECUTIVE BODY.**

MOST RESPECTFULLY SHOWETH:

That the complainant is Vice President, Ludhiana District Cricket Association (LDCA) and is Life Member of the Punjab Cricket Association (PCA). The complainant seek immediate intervention regarding the continued failure to conduct elections of LDCA, resulting in a prolonged ad-hoc administration without any democratic mandate and arbitrarily de-affiliating LDCA and its Executive Body.

1. Brief Background:

- The Ludhiana District Cricket Association is a constituent district association affiliated to the Punjab Cricket Association and is required

to be governed by a duly elected body, in consonance with democratic principles and accepted norms of sports governance.

- The last valid elections of LDCA were conducted in the year 2020 under the supervision and directions of the Hon'ble Punjab & Haryana High Court in CWP-11735 of 2018
- Hon'ble Mr. Justice Permod Kohli, Former Chief Justice of the Sikkim High Court, was appointed as the Observer.
- The election process was conducted under the chairmanship of the Deputy Commissioner, Ludhiana, with Senior PCS officers appointed as Election Officer and Additional Election Officer.
- The entire election process was completed within a court-mandated timeline, demonstrating that free and fair elections are practical and feasible.
- The complete record of the elections continues to be hosted on the Government of Punjab -District Ludhiana website.

2. PCA's Own Acknowledgment and Interim Arrangement:

- The PCA Apex Council recorded that elections were due and constituted an interim/advisory arrangement for Ludhiana District
- The arrangement was expressly temporary in nature as a stop-gap measure. Despite considerable time having passed, no election programme has been notified or conducted, and the interim arrangement continues indefinitely.

3. Grievance

- Denial of democratic representation to members,
- Continuation of an unelected structure lacking accountability:
- Erosion of faith among players and stakeholders,
- Departure from governance standards earlier followed under judicial supervision.

4. Grounds for Intervention

- Violation of democratic sports governance principles.

- Failure to act in accordance with PCA's own recorded decisions.
- Indefinite continuation of ad-hoc arrangements,
- Discrimination between districts.
- Damage to transparency and institutional integrity due to political interference,

5. Reliefs Sought

- Take cognizance of the prolonged non-conduct of LDCA elections,
- Direct PCA to notify and conduct LDCA elections within a fixed time-bound schedule,
- Declare that interim arrangements cannot replace a democratically elected body indefinitely
- Order regarding de-affiliation be revoked,
- Pass such other directions as deemed just and necessary.

PRAYER:

In view of the foregoing, it is most humbly prayed that this Hon'ble Ombudsman-cum-Ethics Officer may be pleased to:

- Allow the present complaint;
- Pass orders as per reliefs sought above;
- Grant any other relief deemed just and proper in the facts and circumstances of the case.

AND FOR THIS ACT OF KINDNESS, THE COMPLAINANT AS IN DUTY BOUND SHALL EVER PRAY.

ANNEXURES:

The Complainant relies upon the following documents in support of this complaint.

Annexure A: Copy of Complaint moved before The Ombudsman-cum-Ethics Officer, Punjab Cricket Association (PCA), PCA Stadium, Phase-IX, S.A.S. Nagar, Mohali.

Annexure B: Copy of Supplementary Submission – LDCA Matter:

Annexure C: Copy of News Publication,

Annexure D: Copy of Mater File, Ludhiana District Cricket Association (LDCA), Official Election Records -2020,

Annexure E : Copy of Mater File, Punjab Cricket Association (PCA), Apex Council Minutes – LDCA Status,

Annexure F : Copy of Final Master Filing Copy, CWP-11735 of 2018 (Punjab & Haryana High Court),

Annexure G : Professional Legal Brief, High court Litigation Concerning District Cricket Associations (Nagaur & Sri Ganganagar) Versus Rajasthan Cricket Association (RCA).

Annexure H : Copy of Public Notice, Punjab Cricket Association (PCA) dated 23/02/2026.

Verification:

It is verified that the contents of applicant are correct, true and best to my personal knowledge and belief and nothing has been concealed therein.


Rakesh Saini

Complainant

Verified at Ludhiana
On

BEFORE THE HON'BLE JUSTICE MR. JASPAL SINGH (RETD.),
THE OMBUDSMAN-CUM-ETHICS OFFICER, PUNJAB CRICKET
ASSOCIATION, I.S. BINDRA STADIUM, SECTOR-63, SAS
NAGAR (MOHALI), PUNJAB.

e-mail: ombusdman@cricketpunjab.in

Complaint No. _____ of 2026

MEMO OF PARTIES

Rakesh Saini s/o Sh.Didar Singh Saini, Vice President, Ludhiana District Cricket Association (LDCA) and Life Member of the Punjab Cricket Association (PCA), House No. 10061, Ward No. 28, Joshi Nagar, Haibowal Kalan, Ludhiana, Punjab.

Complainant

Versus

Punjab Cricket Association (PCA), Through its President/Secretary, IS Bindra Stadium, Sector-63, SAS Nagar, Mohali, Punjab.

Respondent

AFFIDAVIT

Certificate No.: IN-PB29083844614934Y dated 11/03/2026



Affidavit of Rakesh Saini s/o Sh.Didar Singh Saini, Vice President, Ludhiana District Cricket Association (LDCA) and Life Member of the Punjab Cricket Association (PCA), House No. 10061, Ward No. 28, Joshi Nagar, Haibowal Kalan, Ludhiana, Punjab, do hereby solemnly affirm and declare as under:

1. That I am the complainant in the accompanying Memorandum of Complaint filed before the Hon'ble Ombudsman-cum-Ethics Officer, Punjab Cricket Association, and as such I am fully conversant with the facts and circumstances of the case.

2. That the statements made in paragraphs 1 to 5 of the said Complaint are true and correct to the best of my knowledge and belief.
3. That the statements made in paragraphs 1 to 5 are based on information received from reliable sources and records and I believe them to be true.
4. That the Annexures annexed with the Complaint, marked as Annexure-A to Annexure-H are true copies of their respective originals.
5. That I have not suppressed any material fact relevant to the adjudication of this complaint.

Certified that the affidavit has SPA/GPA has been read over & explained to the deponent executant who seemed directly to understand the same at time making thereof


Deponent
(Signature of Rakesh Saini)

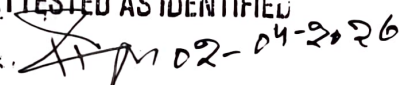
VERIFICATION:

I, the above named deponent, do hereby verify that the contents of this Affidavit are true and correct to the best of my knowledge and belief, no part of it is false, and nothing material has been concealed therein.

Verified at Ludhiana
On 02 APR 2026


Deponent
(Signature of Rakesh Saini)



ATTESTED AS IDENTIFIED

NOTARY PUBLIC
LUDHIANA (PB.)
02 APR 2026

Know the Deponent/Executants personally and he/she has Signed/Thumb impression in my presence

MASTER FILE

LUDHIANA DISTRICT CRICKET ASSOCIATION
(LDCA)

OFFICIAL ELECTION RECORDS – 2020

This Master File consolidates all officially published documents relating to the Ludhiana District Cricket Association (LDCA) elections conducted in the year 2020 under judicial and administrative supervision. All documents referenced herein are hosted on the official Government of Punjab District Ludhiana website.

Official Source:

<https://ludhiana.nic.in/event/ludhiana-district-cricket-association-ldca/>

TABLE OF CONTENTS

1	1. Election Order
2	2. Draft Voter List
3	3. Amended Draft Voter List
4	4. Nomination Form
5	5. Affidavit
6	6. Code of Conduct for Election
7	7. Public Notice
8	8. Annexures
9	9. Order dated 03.11.2020
10	10. Disposal of Objections to Voter List
11	11. Final Voter List
12	12. List of Validly Nominated Candidates

DOCUMENT REFERENCES & ACCESS LINKS

1. Election Order

Available at official Government of Ludhiana website under the LDCA Elections 2020 event page:
<https://ludhiana.nic.in/event/ludhiana-district-cricket-association-ldca/>

2. Draft Voter List

Available at official Government of Ludhiana website under the LDCA Elections 2020 event page:
<https://ludhiana.nic.in/event/ludhiana-district-cricket-association-ldca/>

3. Amended Draft Voter List

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7. Public Notice

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8. Annexures

Available at official Government of Ludhiana website under the LDCA Elections 2020 event page:
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9. Order dated 03.11.2020

Available at official Government of Ludhiana website under the LDCA Elections 2020 event page:
<https://ludhiana.nic.in/event/ludhiana-district-cricket-association-ldca/>

10. Disposal of Objections to Voter List

Available at official Government of Ludhiana website under the LDCA Elections 2020 event page:
<https://ludhiana.nic.in/event/ludhiana-district-cricket-association-ldca/>

11. Final Voter List

Available at official Government of Ludhiana website under the LDCA Elections 2020 event page:
<https://ludhiana.nic.in/event/ludhiana-district-cricket-association-ldca/>

12. List of Validly Nominated Candidates

Available at official Government of Ludhiana website under the LDCA Elections 2020 event page:
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CERTIFICATION

This Master File has been compiled for record, reference, and legal purposes. The documents referenced herein are official government publications and remain available in the public domain on the Government of Punjab, District Ludhiana website. This compilation does not alter the content of any original document.

Compiled for official and legal use.

MASTER FILE

PUNJAB CRICKET ASSOCIATION (PCA)

APEX COUNCIL MINUTES – LDCA STATUS

This Master File consolidates PCA Apex Council minutes, official decisions, implementation records, office orders, and supporting visual exhibits relating to the Ludhiana District Cricket Association (LDCA).

INDEX

- Record 1 – Apex Council Minutes (Item No. 7: LDCA Status & Financial Irregularities)
- Record 2 – Official Decision: Direction for Investigation
- Record 3 – Apex Council Agenda Item No. 3: Advisory Committee
- Record 4 – Implementation / Tabular Extract (Advisory Committee – LDCA)
- Record 5 – PCA Office Order dated 27.03.2025 (Organizing Sub-Committee)
- Record 6 – Media / Public Context (For Reference Only)
- Record 7 onwards – Serial-wise Image Exhibits (Official Documents)

TEXTUAL RECORD SUMMARY

The following pages reproduce serial-wise visual exhibits of PCA Apex Council records and related official communications concerning LDCA, placed in chronological and logical order.

Exhibit 1: PCA Apex Council Minutes – Item No. 7 (LDCA Status & Investigation Order)

Punjab Cricket Association (PCA) - Apex Council Minutes Extract

Item No. 7: Status of District Cricket Associations - Ludhiana (LDCA)

Extracted points regarding Ludhiana District Cricket Association (LDCA):

- The Honorary Treasurer brought to the notice of the Council that certain issues are ongoing in the Ludhiana District Cricket Association (LDCA), potentially involving financial irregularities.
- The President proposed that, as there are financial irregularities involved in this matter, the Deputy CEO, PCA under the supervision of the Honorary Treasurer may look into the matter.
- The Apex Council members agreed with the proposal and directed the Deputy CEO, PCA to investigate and submit a detailed report on the Ludhiana District Cricket Association (LDCA) to the Honorary Treasurer for further review and appropriate action.

Official decision (as recorded):

- Investigate alleged financial irregularities in LDCA and prepare a detailed report (Deputy CEO to investigate under supervision of Honorary Treasurer).

Reference: Extracted and summarized from PCA Emergent Apex Council Minutes (Meeting held on 02 August 2025)

Prepared on: 11 September 2025, 11:26:17

Exhibit 2: Apex Council Agenda Item No. 3 – Decision to Constitute Advisory Committee

regard.

Item No. 3: To consider and to appoint an Advisory Committee to assess the working of Ludhiana District Cricket Association and to take appropriate decisions for transparent and smooth running of the Cricket activities in the Ludhiana district.

The Honorary Secretary informed the members that there are grave allegations/complaints as per communications received by PCA against the Ludhiana District Cricket Association's (LDCA) and its administrators regarding malpractices/misconduct and spending of funds. He further shared with members that the Deputy CEO, PCA was asked to collect the documents and conduct an audit of the association. However, LDCA has not cooperated with PCA for the same.

The Honorary Secretary shared with members that the elections of present Office Bearers and Executive Committee of LDCA is due in November 2025. Therefore, in the meantime, it is recommended to constitute an Advisory Committee to help PCA in conducting cricketing activities, host matches and look after the welfare of the cricketers of the district. The committee would also co-opt one person from the finance department of the PCA for all financial disbursements and accounting purposes and the recommendation of the Honorary Treasurer, PCA would be taken for the same.

The President agreed with the proposal of the Honorary Secretary and requested the Apex Council members to approve to form a five-member Advisory Committee.

The Apex Council, after discussions, unanimously approved the proposal of the Honorary Secretary and authorized the Honorary Secretary to form a five-member Advisory Committee and to do the needful in this regard.

Exhibit 3: Apex Council Implementation / Tabular Record (LDCA Advisory Committee)

3	To consider and to appoint an Advisory Committee to assess the working of Ludhiana District Cricket Association and to take appropriate decisions for transparent and smooth running of the Cricket activities in the Ludhiana district.	- The Honorary Secretary shared with members that the elections of present Office Bearers and Executive Committee of LDCA is due in November 2025. Therefore, in the meantime, it is recommended to constitute an Advisory Committee to help PCA in conducting cricketing activities, host matches and look after the welfare of the cricketers of the district. - The Apex Council, after discussions, unanimously approved the proposal of the Honorary Secretary and authorized the Honorary Secretary to form a five-member Advisory Committee and to do the needful in this regard	-Honorary Secretary	The Sub Committee has been constituted to oversee the arrangements for selection of teams and hosting/participation of Ludhiana District Teams in the PCA Inter District Tournaments for the year 2025-26
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Exhibit 4: PCA Office Order dated 27.03.2025 – Organizing Sub-Committee, LDCA

Date: 27.03.2025

Mr. Sunny Khosla,
Ludhiana

Subject: Nomination as Chairman, Organizing Sub-committee, Ludhiana District

Dear Sir,

The PCA has constituted the following sub-committee to oversee, observe and assist the Ludhiana District in the cricketing affairs of Ludhiana District for the 2025-2026 season:-

Mr. Sunny Khosla	Chairman
Mr. Daksh Prem Azad	Co-Chairman
PCA Selector	For selection trials/practice matches

All may kindly note and coordinate with Ludhiana District.

Thanking you,

Yours sincerely,

Manager Cricket Operations
Punjab Cricket Association

Exhibit 5: Public / Media Reference (Contextual – Not an Official Record)



Jh
JAN HETAISHI
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**एलडीसी को मिली नई सब
कमेटी खिलाड़ियों को राहत**

DATE
Aug 26
09PM

**PCA प्रधान अमरजीत द्वारा
LDCA लुधियाना सब कमेटी
की नई कमेटी घोषित शविंदर
संधू, अभिषेक अरोड़ा, चिंतन
सहगल, अमित बजाज और
राणा रंजीत सिंह शामिल !**



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CERTIFICATION

This Master File with serial-wise visual exhibits is prepared for legal record, ombudsman review, and governance scrutiny. All images are true reproductions of documents supplied by the complainant.