

**IN THE HIGH COURT OF MANIPUR
AT IMPHAL**

**WP(C) No. 205 of 2026 with MC(WP(C)) No. 214 of 2026 with
WP(C) No. 160 of 2026 with MC(WP(C)) No. 158 of 2026 with
MC(WP(C)) No. 169 of 2026 with WP(C) No. 149 of 2026**

Rajkumar Charzal Singh and 13 Ors.

... Petitioners

- Versus -

State of Manipur and 3 Ors.

... Respondents

**B E F O R E
HON'BLE MR. JUSTICE A. GUNESHWAR SHARMA**

ORDER
Oral

17.03.2026

[1] Present Mr. N. Kumarjit, learned sr. counsel assisted by Mr. P. Tamphamani, learned counsel for the petitioners; Mr. S. Nepolean, learned sr. counsel & GA assisted by Mrs. RK. Emily, learned Dy. GA on behalf of the State respondents and Mr. N. Ibotombi, learned sr. counsel assisted by Ms. Y. Jinita, learned counsel for the Manipur Rifle Association (respondent no. 3 -MRA in short, in this batch of writ petitions).

[2] WP(C) No. 160 of 2026 & WP(C) No. 149 of 2026 are filed by some of the Life Members of the Association praying for holding Annual General Body meeting of the Manipur Rifle Association (MRA), for holding of the election of the new Managing Committee and allowing all the petitioners (Life Members) to participate in the Annual General Body Meeting for election of new Managing Committee to be conducted on or before 30.03.2026. The aforesaid 2(two) writ petitions have been filed on the basis of Office Memorandum dated 19.12.2025 issued by the Registrar of Societies, Manipur directing all the societies registered under Manipur Societies Registration Act, 1989 (in short MSRA, 1989) to strictly comply the provisions of the Act and rules framed therein and to make the

association functional latest by 30.03.2026. OM mentions that most of the 50% of the registered Associations/NGOs/Organizations in the State are inactive thereby, violating provisions of the MSRA, 1989. OM further directed all NGOs/Associations/Organizations, whose tenures of the Managing Committee have already expired, to initiate process for holding election of the new Managing Committee.

[3] Mr. N. Kumarjit, learned sr. counsel for the petitioners submits that 14(fourteen) Life members (including some of the petitioners in WP(C) No. 160 of 2026 & WP(C) No. 149 of 2026) have filed the present writ petition being WP(C) No. 205 of 2026 challenging the notice dated 03.03.2026 issued by Ex-Secretary, MRA for holding a Special General Body Meeting of the Manipur Rifle Association, Imphal to be held on 18.03.2026 for fixing date for conducting election of the new Managing Committee of MRA. The notice also requested all the registered Life members of the Association with the office of the Registrar Societies to attend the meeting on time.

[4] The main ground for challenging the notice dated 03.03.2026 for holding a Special General Body Meeting for fixing date of the election of the new Managing Committee is that the same is in contravention of the direction in letter dated 27.02.2026 issued by the Assistant Registrar of Societies, Manipur to the Ex-President/Ex-Secretary of MRA for revival of the MRA. In letter dated 27.02.2026, it was directed to MRA to publish the tentative and final electoral rolls and notice for election in leading and widely circulated daily newspaper without fail. It is also submitted that in the notice dated 03.03.2026 published in newspapers, the list of tentative and final members of the Association are not provided.

[5] This Court issued notice in WP(C) No. 205 of 2026 yesterday i.e. 16.03.2026 and today, the matter is listed for consideration of interim prayer for stay of the Special General Body Meeting of the MRA to be held on 18.03.2026. It is the case of the petitioners that the Annual General Body Meeting is contemplated to be held once in a year under Rule 12 bye-law of the MRA as well as Section 16 of the MSRA, 1989 and the said meeting has not been conducted since the year, 2016. It is also highlighted that the proceeding of the

last election for the period from July, 2019 to July, 2023 was not approved by the Annual General Body Meeting. Vide letter dated 05.07.2019 issued by Registrar of Societies, Manipur to the President/Secretary, MRA, the 23(twenty three) members of the Managing Committee and Office Bearers of the MRA for the years July, 2019 to July, 2023 was duly approved. However, the petitioners have not challenged the election of the earlier Managing Committee for the period from July, 2019 to July, 2023. It is inter-alia prayed - (i) to quash the Meeting notice dated 03.03.2026; (ii) for updating life members enrolled from 2014 till date; (iii) for allowing petitioners/life members to participate in Special General Body Meeting for holding election & (iv) directing respondent no. 2 to conduct enquiry as per Act & Rules.

[6] Mr. S. Nepolean, learned GA appearing on behalf of the State respondents submits that till now, State respondents have not filed any counter affidavit. However, he has referred to the provisions of MSRA, 1989 and bye-law of the MRA. It is also submitted that since most of the registered Associations in Manipur under MSRA, 1989 are inactive and in order to revive the same in compliance of the provisions of the MSRA, 1989 & Rules framed therein and under bye-law of the individual society, the OM dated 19.12.2025 was issued as a General Instruction to all Societies whose tenure of the Managing Committee have already expired and are inactive, to do the needful including holding of the election on or before 30.03.2026. In the present case, Assistant Registrar of Societies, Manipur sent a letter dated 27.02.2026 to the Ex-President/ Ex-Secretary, MRA to do the needful for revival of the Association by holding a Special General Body Meeting for the purpose of holding election of new Managing Committee and this instruction was issued on the basis of the 2(two) separate representations submitted by the members of the Association including some of the petitioners herein.

[7] Mr. S. Nepolean, learned GA has pointed out that the instruction in letter dated 27.02.2026 is issued to MRA in continuation of the earlier OM dated 19.12.2025 issued by the Registrar of Societies, Manipur directing all the defunct registered Associations to do the needful for revival by conducting the election of the new Managing Committee. The learned GA further submits that

the substantive prayer in WP(C) No. 160 of 2026 & WP(C) No. 149 of 2026 is to conduct election of the MRA in terms of the direction in OM dated 19.12.2025. Accordingly, the Ex-Managing Committee issued notice dated 03.03.2026 for holding a Special General Body Meeting on 18.03.2026 for fixing date for conducting election of the new Managing Committee. This notice dated 03.03.2026 is in compliance of the OM dated 19.12.2025 as well as specific instruction dated 27.02.2026. This is also in terms of the prayer of the writ petitions in WP(C) No. 160 of 2026 and WP(C) No. 149 of 2026 praying for holding election. However, some of the life members are challenging the notice dated 03.03.2026 for fixing a date for Special General Body Meeting on 18.03.2026 in WP(C) No. 205 of 2025 on the ground that the same is not strictly in terms of the instruction issued by the Assistant Registrar of Societies in its letter dated 27.02.2026.

[8] Mr. S. Nepolean, learned GA has also clarified that the plea of the writ petitioners in WP(C) No. 205 of 2026 to the fact that election is fixed on 18.03.2026 without publishing the list of tentative and final voter list of the members of the Association, is not correct and the meeting scheduled on 18.03.2026 is for fixing a date for holding election of the new Managing Committee. With respect to the status of the life members of the writ petitioners, Mr. S. Nepolean, learned GA draws the attention of this Court to the provisions of MSRA, 1989 and bye-laws of the MRA. Rule 5(b) of bye-law of MRA defines Life Members as person who pay Rs. 5000/- to the Association and nominated by the Managing Committee as members. Rules 5(c) and 5(d) define Annual Members and Affiliated Members. Rule 10 of the bye-law of the MRA stipulates that the General Body of the Association shall consist of the members mentioned in the Rules 5(b), (c) and (d), i.e., Life Members, Annual Members and Affiliated Members. The learned GA also refers to the provision of Rule 6(c) which provides that the Secretary of the Association shall place the application before the Managing Committee for admission of members. In case of Annual Members, the decision of the Managing Committee is final and in case of Life Members and Affiliated Members, the provisional approval of the Managing Committee shall be subject to the approval of the General Body. The learned GA further submits that Rules 17(g) & (h) fix the tenure of the Managing Committee as 4(four) years and

after expiry of the term, the Managing Committee will have no right to function except arranging election for the new Managing Committee. It is the admitted case of the parties that the Annual General Body Meeting of the MRA has not been held since the year 2016.

[9] Mr. S. Nepolean, learned GA submits that the status of life membership of the petitioners and other persons who have submitted applications and paid necessary fee for Life Members, are yet to be confirmed by the General Body of the Association and as such, the petitioners cannot be considered as full Life Members who are entitled to participate in the election of the new Managing Committee. It is submitted that the writ petitions are not maintainable on this ground alone.

[10] Mr. N. Ibotombi, learned sr. counsel appearing on behalf of the MRA adopts the submission of Mr. S. Nepolean, learned GA and he further submits that MRA has filed a common counter affidavit in WP(C) No. 160 of 2026 thereby, enclosing the application forms for life member of MRA submitted by some of the petitioners and others. It is also submitted that on perusal of these applications, some of the applications are incomplete and all the applications for new Life Members are yet to be placed before the General Body Meeting and the General Body Meeting has not been conducted since the year 2016. In all these connected writ petitions, respondent no. 4 (National Rifle Association of India) is yet to be served. However, all the learned sr. counsel appearing for the parties submit in one voice that these writ petitions can be disposed of on the basis of the submissions and pleadings of the petitioners and respondent nos. 1, 2 & 3.

[11] This Court has perused the materials on record and submissions made at bar. It is admitted by all the parties that (i) the last Managing Committee of MRA was for the years from July, 2019 to July, 2023 and after that, election for the new Managing Committee has not been conducted; (ii) the Annual General Body Meeting of the MRA is not held since the year, 2016; (iii) the Registrar of Societies, Manipur issued an OM dated 19.12.2025 directing all the defunct registered Associations under MSRA, 1989 to make necessary step for revival of such Association by holding election for the new Managing Committee on or before 30.03.2026; (iv) Office of the Registrar of Societies also issued a

specific direction to the Ex-Managing Committee of the MRA vide letter dated 27.02.2026 to make effort for revival of the Association in terms of the OM dated 19.12.2025; & (v) in the circumstances, the Ex-Managing Committee of MRA issued a notice dated 03.03.2026. The prayer in WP(C) No. 160 of 2026 and WP(C) No. 149 of 2026 is for holding election in terms of the OM dated 19.12.2025 and also to allow the petitioners herein to participate in the election. The prayer in WP(C) No. 205 of 2026 is somewhat different and is questioning the notice dated 03.03.2026.

[12] This Court has minutely examined the provisions of MSRA, 1989 and bye-laws of the MRA updated as on 13.12.2024. Section 16 of the Act mandates annual general meeting of the society every year and Rule 12 of the bye-law of MRA requires to hold annual meeting of the General Body within 1(one) month from the close of the financial year inter-alia to transact business brought up by the Managing Committee. The writ petitioners have annexed identity cards issued by respondent no. 3 (MRA) as Life Members. In terms of the provisions and Rules 5(b) & 6(c), the applications for Life Members have to be approved by the General Body of the Association. It is also admitted fact that the applications are yet to be placed before the General Body of the Association for approval in terms of Rule 6(c). In the circumstances, this Court proposes to dispose of the pending writ petitions by allowing the Ex-Managing Committee of the MRA to hold election strictly in terms of OM dated 19.12.2025 and letter dated 27.02.2026 issued by the Office of the Registrar of Societies, Manipur. The respondent no. 3 after election of the new Managing Committee shall place the pending applications for life membership in terms of the provision of the MSRA, 1989 & bye-laws of the MRA before the General Body of MRA.

[13] Mr. N. Ibotombi, learned sr. counsel for the respondent no. 3 (MRA), on instruction, undertakes that the new Managing Committee will place the pending applications of the Life Members before the General Body and the applications will be considered in terms of the applicable rules.

[14] Mr. N. Kumarjit, learned sr. counsel for the petitioners submits that the disposal of the writ petitions shall not affect the right of the petitioners

for moving appropriate forum for their grievance including under Section 22 of the MSRA, 1989 and the same may be reserved.

[15] Since the election are to be held in pursuance of the OM dated 19.12.2025 and instruction in letter dated 27.02.2026, this Court is of the view that the main prayer in WP(C) No. 160 of 2026 and WP(C) No. 149 of 2026 has been substantively complied. With respect to the prayer in WP(C) No. 205 of 2026, this Court clarifies that the proposed election in terms of the OM dated 19.12.2025 and instruction dated 27.02.2026 can be proceeded as per applicable rules. However, the new Managing Committee shall place the pending applications of Life Members for approval by the General Body. If there are discrepancies/defects in the applications for Life Members, the applicants shall be given an opportunity to rectify the same. In the pending applications, the respondent no. 3 shall give an opportunity to the petitioners and other applicants to rectify discrepancies as pointed out earlier. In the circumstances, WP(C) No. 205 of 2026, WP(C) No. 160 of 2026 & WP(C) No. 149 of 2026 are disposed of in terms of the above observations.

[16] It is clarified that the petitioners reserve the right for approaching appropriate forum for their grievances in terms of the provisions of the MSRA, 1989, Rules and bye-laws of the MRA.

[17] It is made clear that this Court does not express any opinion on the merit of the case except for the observations made herein for disposal of the present batch of writ petitions.

[18] Interim order, if any, is merged with the final order.

[19] Accordingly, the MC(WP(C)) No. 214 of 2026, MC(WP(C)) No. 158 of 2026 & MC(WP(C)) No. 169 of 2026 are also disposed of.

JUDGE

Thoiba