



**HIGH COURT OF JUDICATURE FOR RAJASTHAN AT
JODHPUR**

2023:RJ-JD:29586-DB

D.B. Civil Writ Petition No. 6867/2023

1. Choudhary Parmaram Godara Agriculture College, Bhadra, Nohar Hisar Bypass Road, Godara Farm Houser, Bhadra, District Hanumangarh (Rajasthan), Through Its President, Shri Vikas Choudhary S/o Shri Ram Singh Godara, Aged About 26 Years, R/o Godara Farm House, Near Choudhary Parmanand Godara T.t. Collage, Bhadra, Hanumangarh (Raj.).
2. Mahaveer International Agriculture Institution, Through Its Parent Body Mahaveer Educational And Social Welfare Trust, Nai Mandi, Gharsana, District Sriganganagar, Through Its Secretary Sh. Satpal S/o Omprakash, Aged About 52 Years, R/o Ward No. 16 Nai Mandi Gharsana District Sriganganagar (Raj.).

-----Petitioners

Versus

1. Union Of India, Through The Secretary, Ministry Of Finance, Department Of Revenue, North Block, New Delhi 110001.
2. State Of Rajasthan, Through The Joint Secretary (Tax), Finance Department, 1St Floor, Main Building, Government Secretariat, Jaipur - 302005, Rajasthan.
3. Principal Chief Commissioner, Central Goods And Services Tax, Ncr Building, Statue Circle, C-Scheme, Jaipur 302005 (Rajasthan).
4. Swami Keshwanand Rajasthan Agricultural University, Through The Vice - Chancellor, National Highway No. 15, Sriganganagar Road, Beechwal, Bikaner 334006 (Rajasthan).
5. Goods And Service Tax Council, Through The Secretary, 5Th Floor, Tower Ii, Jeevan Bharti Building, Janpath Road, Connaught Place, New Delhi - 110001

-----Respondents

For Petitioner(s) : Mr. Sharad Kothari
Mr. Kalpit Shishodia
Mr. Dinesh Kumar Bishnoi
Mr. Chirag Soni



Mr. Abhimanyu Yadhuvanshi
Mr. Bhuwaneshwar Singh Sisodia
Mr. C.S. Kotwani with
Mr. Avdesh Parashar
Mr. Ankur Mathur
Mr. Divik Mathur
Mr. Rahul Lakhwani
Ms. Adwaita Sharma
Mr. Chayan Bothra

For Respondent(s) : Mr. Mahaveer Bishnoi, AAG with
Mr. Harshwardhan Singh
Mr. Mrigraj Singh Rathore
Mr. Rajvendra Saraswat with
Mr. Jitesh Kumar Suthar
Mr. Rajeev Purohit
Ms. Akshiti Singhvi

HON'BLE MR. JUSTICE ARUN MONGA
HON'BLE MR. JUSTICE YOGENDRA KUMAR PUROHIT

Order

Judgment Reserved on:- 15/01/2026

Pronounced on :- 23/02/2026

By the Court (Per, Arun Monga, J):-

1. At the time of hearing, learned counsel appearing for both sides agreed that the controversy involved in the instant petition is identical to the one in case titled Rajasthan Technical University vs. Union of India & Ors.; D.B. Civil Writ Petition No. 9556/2024, i.e. whether affiliation fees charged by a university from colleges constitute a "service" liable to tax under the provisions of the CGST Act, 2017.

2. In the judgment of even date rendered in Rajasthan Technical University *ibid*, it has been held that affiliation fee does not amount to consideration for a taxable service and, therefore, is not liable to service tax. For detailed reasons, reference may be made to the judgment dated 23.02.2026 passed in D.B. Civil Writ



Petition No. 9556/2024 and the discussion and reasoning recorded therein shall be read as part and parcel hereof and are not being repeated for the sake of brevity.

3. In view of the above, the instant petition is also allowed. It is held that affiliation fee levied by universities from college does not fall within the scope of taxable services, and accordingly, the impugned demands are unsustainable.

4. Pending application(s), if any, shall stand disposed of.

(YOGENDRA KUMAR PUROHIT),J

(ARUN MONGA),J

92-DhananjayS/-