

SPORTS LAW: ANALYSIS, EVOLUTION AND THE INDIAN PERSPECTIVE

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ABSTRACT

This Article talks about Sports and discusses the legal aspects involved in the sports field. Sports law is an evolving concept throughout the world and it requires the law to develop and to be protected from illegal malpractices in several fields. This article delves into various aspects of sports law including its history, how it evolved with time, how it has been established in different countries, and about various non-governmental organizations. It also talks vividly about the issues involved in the sports law scene, and how they affect sportspersons and the sports community as a whole as well as the Indian perspective of the law, its origins, and the agencies and policies that regulate it throughout the country. At last, the article provides certain suggestions for the development and growth of this particular field in India.

Keywords: Sports, Sports Law, Issues, Authorities, Precedents.

INTRODUCTION

If you do not believe you can do it then you have no chance at all.~ Arsene Wenger.

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Sports have become an intrinsic part of the lives of human civilization. These can be recreational and entertaining but are very essential for the well-being of a person as with regular involvement in sports, one can stay healthy, mentally and physically fit as well as develop as a human being in a healthy but competitive environment.

Sports is a very old concept that was first introduced as a source of entertainment. Games were primarily devised to build social interactions to show others their skills and abilities and to entertain.¹

As stated in the New Encyclopedia Britannica, Sports and games are recreational or competitive activities that involve some amount of physical strength or skill. At one time,

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¹ Dr. Anil Kumar Thakur et al., 'Sports Law in India: Present status and Future Road map', (May 2018) Volume XV (Issue no 3) Journal of Advances and Scholarly Researches in Allied Education
<https://scholar.google.com/scholar?hl=en&as_sdt=0%2C5&q=sports+law+in+India+Present+status+and+future+&btnG=#d=gs_qabs&t=1718950018409&u=%23p%3DGDkSygHyOakJ> accessed June 20, 2024

sports were commonly considered to include only outdoor recreational pastimes, such as fishing, shooting, and hunting as opposed to games, which were regarded as organized athletic contests played by teams or individuals according to prescribed rules.²

SPORTS LAW: EXPLORING THE LEGAL CONCEPT

Sports have been prevalent for a time long past. Several games had existed from that period during the early ages. The laws were considered to be a set of rules. However, it was not predictable that the rules of the game would become such an important part, which would ultimately lead to a different field of law altogether, which is known as sports law today.

There are abundant principles of law that can apply to the field of sports. The law of sports has adopted different legal principles and provisions such as contract law, taxation law, competition law, trademark law, tort law, human rights law, public law, property law, and other statutory provisions. These provide a support system to the sports personnel to have a better understanding of their legal rights and duties. The legal system furthers its assistance to the general public and protects the rights of individuals by punishing or penalizing the wrongdoers. Likewise, there are several offences in the field of sports, that put the rights of individuals in jeopardy, and therefore the legal system is set up to provide relief.³

According to Gardiner,⁴ "The extent of the relationship between sport and law has led some academics to extend their legal analysis beyond the confines of sport and the law by identifying a distinct body of sports law". Distinct doctrines are gradually becoming tangible in the field of sports.

However, there is a different array of thought processes that condemn this separate branch of law. For example, Grayson⁵ argues that 'no subject exists which jurisprudentially can be called sports law. As a sound-bite headline, shorthand description, it has no juridical foundation; for common law and equity create no concept of law exclusively relating to sport. Each area of

² The New Encyclopedia Britannica (first published 1768, 15th edition, 1997) 11

³ Marc Edelman, 'Regulating fantasy sports: A practical guide to state Gambling laws, and a proposed framework for future state legislation', (2017) Volume 92 (Issue no.2) Indiana Law Journal
<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.repository.law.indiana.edu/cgi/viewcontent.cgi?article%3D11245%26context%3Dilj&ved=2ahUKEwiD4tCs5OyGAXR3jgGHbGJA3oQFnoECBgQAQ&usq=AOvVaw15mg6qhsF5-HKpkqZtJu_H> accessed June 21, 2024

⁴ Simon Gardiner, *Sports Law* (2nd edition, Routledge Cavendish, October 24, 2001)

⁵ Edward Grayson, *Sports and the Law* (2nd edition, London: Butterworth, 1994)

law applicable to sport does not differ from how it is found in any other social or jurisprudential category ...’

Sports law has been a matter of concern for various countries for years. The United Kingdom and India do not have any particular legislation or any specific law relating to sports law. In the United States sports law overlaps to a huge extent with contract law, competition law, labor law, and tort law. The government agency responsible for sports in China is the General Administration of Sports of China. All-China Sports Federation and the Chinese Olympic Committee are also established and administered by the council.⁶

The United Nations General Assembly adopted and approved the International Convention against Apartheid in Sports to end racial discrimination against South Africa on December 14th, 1977. This convention vividly disregards and condemns the practice of apartheid by the undersigned state parties and prohibits them from contracting with any country practising apartheid. The convention speaks about establishing a commission against Apartheid in sports.⁷

The International Convention against Doping was adopted by UNESCO on 19th October 2005. This convention shows that the governments of various countries around the world have consented to confer forces of international law upon anti-doping policies.⁸

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The international non-governmental sports organizations namely The International Olympic Committee (IOC), The World Anti-Doping Agency (WADA), and the International Sports Federations play a vital role in this regulatory framework. The International Sports Federations are the bodies that handle the organization of sports events and activities at the international level. These are established in compliance with private domestic laws whose active members are the national sporting associations those which have been admitted into membership. They organize and manage their international competitions.⁹

⁶ Dr. Anil Kumar Thakur et al., ‘Sports Law in India: Present status and Future Road map’, (May 2018) Volume XV (Issue no 3) Journal of Advances and Scholarly Researches in Allied Education
https://scholar.google.com/scholar?hl=en&as_sdt=0%2C5&q=sports+law+in+India+Present+status+and+future+&btnG=#d=gs_qabs&t=1718950018409&u=%23p%3DGDKsygHyOakJ accessed June 20, 2024

⁷ International Convention against Apartheid in Sports, 10th of December, 1985

⁸ International Convention against Doping in Sports, 19th October, 2005

⁹ Carmen Pérez González, ‘International Sports Law’, (*Oxford Bibliographies*, March 22nd, 2018)
<<http://www.oxfordbibliographies.com/view/document/obo-9780199796953/obo-9780199796953-0073.xml>>
accessed June 22, 2024

INESCAPABLE ISSUES INVOLVED

There are various issues involved in the field of sports law. These issues occur often because of corruption, anti-trust, contract cancellation, gambling, betting, and other reasons. These arising issues pose a huge threat to the solidarity and integrity of the sports industry and that is why the preservation of the regulations along with the integrity remains crucial.¹⁰ A few of these issues are stated in the following

Match Fixing

Match-fixing in today's sports and games is a taboo and a huge setback for any particular sport whichever faces it. A game or sport can only be enjoyable for the onlookers or the audience as long as it is unpredictable, whereas this issue of match-fixing ruins the sentiment of the spectators and tarnishes the solidarity of the sport. As seen in the case of "Worcestershire v Somerset, 1979",¹¹ in which the match was fixed and the aim was to influence the tie-breaker. This hugely outraged the audience and the media personnel leading to Somerset being expelled from the tournament.

Doping

The performance enhancement of the players using drugs is erroneous, so as a consequence, these drug users get indicted and punished strictly. After the creation of the World Anti-Doping Agency (WADA) in 1999, lots of different malpractices concerning Doping were identified but they are still prevailing in the sporting field. There are a few punishments that aim to sanction the wrongdoers which involve a maximum punishment of 4 years of jail, but this could be reduced if the wrongdoers submit the information of the supply chain or source.¹²

Contractual Issues

Nowadays contracts and agreements have become more and more common in the sports perspective. Many sports authorities and associations contract with coaches and players for their employment, very often the athletes sign sponsorship agreements and various other forms of contracts that cover major factors such as discipline, money issues, image rights, etc. But

¹⁰ Mark James, *Sports Law*, (3rd edition, Hart Publishing, April 26, 2017)

¹¹ *Worcestershire v Somerset*; [1979]

¹² Subhrajit Chanda, *Handbook: Developing Sports Law in India: A Challenge Ahead*, (1st edition, INSC International Publishers, 2021)

there also are a few issues relating to affirmative injunctions in which an athlete is prohibited from playing with any other club except the one they have contracted with.¹³

Organizational Issues

In the Sports Leagues, the biggest issue is to appease the interest of competition among the franchises or clubs as well as maintaining the sportsmanship spirit. There are also issues regarding league format and design to abstain from the anti-trust laws.¹⁴

IP Law Issues

There are a lot of cases about the violation of copyrights and trademarks or overall, the Intellectual property rights. For instance, in the case of ESPN Software India Private Ltd v Tudu Enterprise and Ors,¹⁵ the defendant injured the plaintiff's copyright by displaying the broadcast of an event through the plaintiff's transmitting channels without having any legitimate contract with the plaintiff. Also, in the case of Sourav Ganguly v Tata Tea Ltd,¹⁶ Sourav Ganguly, the manager of a popular tea brand, sued that tea brand for cashing in by using his name when he didn't even associate with them and successfully settled the dispute.

Illegal Betting and Gambling

In India Sports Betting is illegal and mostly banned except for betting on horse races. All other sports betting is governed by the laws of individual state governments which when violated is considered a criminal offence. The advent of gambling on online platforms has increased the probability of match-fixing for financial gain.¹⁷ and many other issues such as harassment, player rights, Broadcasting rights, etc.

¹³ Geoffrey Christopher Rapp, 'Affirmative Injunctions in Athletic Employment Contracts: Rethinking the Place of the Lumley Rule in American Sports Law', Volume 16 (Issue no 2), Marquette Sports Law Review, <<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://core.ac.uk/download/pdf/148695024.pdf&ved=2ahUKEwjov8WN8e6GAxVTyjGHcChBj8QFnoECA0QAQ&usg=AOvVaw1SfCzLtT2w0DKAYGxsP5ZM>> accessed June 22, 2024

¹⁴ Stephen F. Ross et al., 'The Law and Economics of Optimal Sports League design', (working paper no 03, September 30, 2003) Illinois Public Law and Legal Theory Research Papers Series, <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://papers.ssrn.com/sol3/paper.s.c.m%3Fabstract_id%3D452861&ved=2ahUKEwi9ub_gPGGAXYnmMGHQvbAwYQFnoECA4QAQ&usg=AOvVaw34hcfRgKhmNC4j_IUL_wt> accessed June 23, 2024

¹⁵ Ipleaders, *Software India Private Ltd v Tudu Enterprise and Ors*; CS(OS)no 384 (2011)

¹⁶ Ipleaders, *Sourav Ganguly v Tata Tea Ltd*; CS no 361 (1997)

¹⁷ Shreya, 'Sports Betting and laws relating to it', (*Legal Services India E-Journal*)

<<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.legalserviceindia.com/legal/article-3111-sports-betting-and-laws-relating-to->

INDIA AND SPORTS LAW

Sports law in India is almost non-existent. It is an assemblage of some legal precedents along with some policy decisions under the government of India.¹⁸ It is an evolving subject. The promotion and development of sports law depends upon the administration which consists of clubs at the grassroots level. The district sports federations altogether form the state sports federations and these sports federations of different sports fields form the national sports federation.¹⁹ The Ministry of Youth Affairs and Sports was established by the Indian government to design the infrastructure and to promote capacity building for broad-basing sports along with gaining excellence in several competitive events at the national as well as international stages. The Ministry occasionally issues notifications and guidelines with the intent to regulate the functions of National Sports Federations (NSFs).²⁰ The sports activities are regulated by the following:

Sports Authority of India (SAI)

The Sports Authority of India was established by the government of India on 16th March 1984. It was set up to implement the existing schemes, the promotion, and the development of sports events and activities, for sponsoring and encouraging people to conduct numerous kinds of research work to bring development in the field of games and sports. These projects are carried out through the various regional centres and training centres of SAI spread throughout the country.²¹

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¹⁸ Dr. Anil Kumar Thakur et al., 'Sports Law in India: Present status and Future Road map', (May 2018) Volume XV (Issue no.3) Journal of Advances and Scholarly Researches in Allied Education

https://scholar.google.com/scholar?hl=en&as_sdt=0%2C5&q=sports+law+in+India+Present+status+and+future+&btnG=#d=gs_qabs&t=1718950018409&u=%23p%3DGDKsygHyOakJ accessed June 20, 2024

¹⁹ Lavanya Verma, 'All you need to know about sports league in India', (*Ipleaders*, May 15th, 2017)

<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://blog.ipleaders.in/how-are-sports-leagues-regulated-in-india/&ved=2ahUKEWjp162ZrvGGAXX74TgGHei-CwQQFnoECA8QAQ&usg=AOvVaw28fFePFPsTWpbV-oF_Ly9L> accessed June 23, 2024

²⁰ Gaurang Kanth, 'Emergence of sports in India', (*Indian Law Journal*, 2017)

<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.indialawjournal.org/archives/volume3/issue_2/article_by_Gaurang.html&ved=2ahUKEWjJ-Y_2h_KGAXVQ1jgGHSgiAAQQFnoECBMQAQ&usg=AOvVaw1-sWGOLzqs-IHMD-VyFugA> accessed June 23, 2024

²¹ Sports Authority of India, Ministry of Youth affairs and sports, Government of India

National Sports Policies

The national sports policies were first constructed in India in 1984. Its objective was to improve the quality of nationwide sports performance at the national and international stages. The key objectives of the policy were to improve the country's status in international competitions, to bring sports within reach of various sections of society, develop the sports infrastructure throughout India, Assist the sports personnel with the best possible infrastructure, coaches, equipment, and sports science data, promote participation in various sports, refine the employment prospects for sports personnel and curb doping and other malpractices in sports. These policies were designed to, go hand in hand with other sports law organizations such as the Sports Authority of India (SAI), the Indian Olympic Organization (IOA), and the National Sports Federations (NSFs).²²

Sports Law and Welfare Associations of India (SLAWIN)

The Sports Law and Welfare Association of India is a non-profit, national, professional organization whose common objective is the understanding, advancement, and ethical practices of sports law in the country for the promotion, and development of sports law by providing consultation on various legal matters. It aims to bring the legal and sports personnel to work hand in hand.²³

Sports Broadcasting Signals (Mandatory Sharing with Prasar Bharati) Act, 2007

The Sports Broadcasting (Mandatory Sharing with Prasar Bharati) Act was passed in 2007, with the aim of providing a large number of listeners access to sports events of national importance by mandatory sharing of sports broadcasting signals with Prasar Bharati. According to the act, no content right owner, television holder, or radio broadcaster shall carry a radio

²² Vijay Pal Dalmia, 'Sports Law in India', (*Mondaq*, 12th November 2023)

<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.mondaq.com/india/sport/1386912/sports-law-in-india%23~:text%3DThe%2520National%2520Sports%2520Policy%2520was,to%2520expand%2520the%2520overall%2520objectives.&ved=2ahUKewj9rZfDhfOGAxVgxjgGHUgsB3QQFnoECBAQBA&usg=AOvVaw2BZV-H78GEuy6A_CvJ-D6D> accessed June 24, 2024

²³ Ashuti Panjwani et al., 'The prevention of sports Fraud Bill, 2013: A Messiah to Indian Sports?', Volume 1 (Issue no.3) International Journal for legal development and allied issues, <<http://wp.thelawbrigade.com/wp-content/uploads/2019/05/5.pdf>> accessed June 24, 2024

commentary broadcast or live television broadcast on any cable or Direct-to-Home network in India for any sports event of national importance.²⁴

LANDMARK PRECEDENTS

Zee Telefilms and Ors v Union of India and Ors

This case is called the ‘Magna Carta’ of the Indian Sports Law. The BCCI had an agreement with Zee Telefilms for the broadcasting of test matches, which it cancelled arbitrarily. Zee Telefilms sued BCCI for violation of its rights under Article 32 of the constitution. The question of law arising was whether BCCI comes under the ambit of “state” under Article 12 of the constitution. The majority of the judges thought that it is not a state but a minority of them were of the opinion that it performs state-like similar functions. Judges have applied this case law as a precedent in various cases. In 2005, when the question of law arose about the maintainability of the petition under article 226, the court opined that BCCI may not be a “state” but it performs the functions of the state and therefore it is answerable to the court. Hence any sports organization can be answerable to the court even if it doesn’t come under the ambit of “State”.²⁵

Lodha Committee Report

Journal of Legal Research and Juridical Sciences

The Cricket Association of Bihar filed an appeal before the Supreme Court regarding the amendments made by BCCI in the rules of a T20 cricket tournament where the prima facie beneficiary was ‘Mr. N Srinivasan’ the then president of BCCI. The court held that BCCI is bound to follow “fairness” and “good faith” in all the activities it performs. In deciding fairness, it set up the “Lodha Committee” for the investigation of this matter. The Supreme Court after examining the report from “The Lodha Committee” was of the opinion that the amendment legally violated the principles of natural justice and held it to be unfair and unreasonable.²⁶

²⁴ Gaurang Kanth, ‘Emergence of sports in India’, (*Indian Law Journal*, 2017)

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²⁵ Ipleaders, *Zee telefilms and Ors v Union of India and Ors*; 4 SCC 649 (2005)

²⁶ Naman Sherstra, ‘Ten cases that shaped sports law in India’, (*Ipleaders*, December 21st, 2020)

<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://blog.ipleaders.in/ten-cases-shaped-sports-law-india/&ved=2ahUKewjJtLn9ufOGAxVtyqACHR6GD4gQFnoECBIQAQ&usq=AOvVaw0Scr6e7hLq-GujAD-mdPac> accessed June 24, 2024

CONCLUSION WITH SUGGESTIONS

In India, the sports industry has been growing very rapidly with time. Whereas there is no definite law of sports or any specific legislation concerning sports law. With the changing pace of our society and the world, we need to grow faster as a nation.

Nations such as “Croatia” or “Morocco” even having less than one-fourth of the Indian population have been representing their countries in the “FIFA World Cup” whereas our country gets battered by “Afghanistan” in the 2nd round of “World Cup Qualifiers”, and still nobody gives any attention. Hence the People along with the media need to be more attentive in the coverage of every other sport in our country.

No other sport is termed equal to “Cricket” in India, and cricket is followed as a religion in India. It's not the fault of the sport, but it is the audience or the people of India only who are at fault. Therefore, we need to have a straight mindset while supporting a sport and every sport should be given equal importance.

The people of India only follow and have minimum know-how about those sportspersons who have achieved success at a sky-high level. For example, nobody in India had any clue about the Javelin throw athletes of India but when Neeraj Chopra became the first athlete to win a gold medal at the Olympic games, everybody was on the edge of their seat supporting him. But here everybody needs to learn it's not the individuals or the teams or the sport we are supporting but it is the country for which we have the patriotic feeling and every sport or sportsperson is to be supported only by us and no one else.

The government needs to look after the sports field too because there is no specific legislation in this sports aspect in India. For which the best it can do is the formation of a “Sports Committee” which looks after sports throughout the country. It shall perform distinctive functions such as advising the Ministry of Youth Affairs and Sports, providing assistance in scouting talents, ensuring the adequate allocations of funds to different sports organizations at the state as well as the national level, and overlooking the policy implementation at various levels. It shall also have the power to settle disputes over sports-related topics and issues.²⁷

²⁷Gaurang Kanth, ‘Emergence of Sports in India’, (*Indian Law Journal*, 2017)

https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.indialawjournal.org/archives/volume3/issue_2/article_by_Gaurang.html&ved=2ahUKewjJ-

India needs changes and it requires some definite legislation in the aspect of sports for the overall development and advancement in this domain.



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REFERENCES

Dr. Anil Kumar Thakur et al., 'Sports Law in India: Present Status and Future Road map', (May 2018) Volume XV (Issue no 3) Journal of Advances and Scholarly Researches in Allied Education <https://scholar.google.com/scholar?hl=en&as_sdt=0%2C5&q=sports+law+in+India+Present+status+and+future+&btnG=#d=gs_qabs&t=1718950018409&u=%23p%3DGDKsygHyOakJ> accessed June 20, 2024

The New Encyclopedia Britannica (first published 1768, 15th edition, 1997) 112

Marc Edelman, 'Regulating fantasy sports: A practical guide to state Gambling laws, and a proposed framework for future state legislation', (2017) Volume 92 (Issue no.2) Indiana Law Journal <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.repository.law.indiana.edu/cgi/viewcontent.cgi%3Farticle%3D11245%26context%3Dilj&ved=2ahUKEwiD4tCs5OyGAXR3jgGHbGJA3oQFnoECBgQAQ&usq=AOvVaw15mg6qhsF5-HKpkqZtJu_H> accessed June 21, 2024

Simon Gardiner, Sports Law (2nd edition, Routledge Cavendish, October 24, 2001)

Edward Grayson, Sports and the Law (2nd edition, London: Butterworth, 1994)

International Convention against Apartheid in Sports, 10th of December, 1985

International Convention against Doping in Sports, 19th October, 2005

Carmen Pérez González, 'International Sports Law', (Oxford Bibliographies, March 22nd, 2018) <<http://www.oxfordbibliographies.com/view/document/obo-9780199796953/obo-9780199796953-0073.xml>> accessed June 22, 2024

Mark James, Sports Law, (3rd edition, Hart Publishing, April 26, 2017)

Worcestershire v Somerset [1979]

Subhrajit Chanda, Handbook: Developing Sports Law in India: A Challenge Ahead, (1st edition, INSC International Publishers, 2021)

Geoffrey Christopher Rapp, 'Affirmative Injunctions in Athletic Employment Contracts: Rethinking the Place of the Lumley Rule in American Sports Law', Volume 16 (Issue no.2),

Marquette Sports Law Review,

<<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://core.ac.uk/download/pdf/148695024.pdf&ved=2ahUKEwjov8WN8e6GAXVTyGjGHcChBj8QFnoECA0QAQ&usg=AOvVaw1SfCzLt2w0DKAYGxsP5ZM>> accessed June 22, 2024

Stephen F. Ross et al., 'The Law and Economics of Optimal Sports League design', (working paper no 03, September 30, 2003) Illinois Public Law and Legal Theory Research Papers Series, <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3D452861&ved=2ahUKEwi9ub_gPGGAXX YnmMGHQvbAwYQFnoECA4QAQ&usg=AOvVaw34hcfRgKhmNC4j_IUL_wt> accessed June 23, 2024

Ipleaders, Software India Private Ltd v Tudu Enterprise and Ors; CS(OS)no 384 (2011)

Ipleaders, Sourav Ganguly v Tata Tea Ltd; CS no 361 (1997)

Shreya, 'Sports Betting and laws relating to it', (Legal Services India E-Journal) <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.legalserviceindia.com/legal/article-3111-sports-betting-and-laws-relating-to-it.html&ved=2ahUKEwjJgv2Nl_GGAXUKxzgGHWCLC_sQFnoECCcQAQ&usg=AOvVaw1KPC5YGMGA0f7yuf8i_HF> accessed June 23, 2024

Lavanya Verma, 'All you need to know about sports league in India', (Ipleaders, May 15th, 2017) <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://blog.ipleaders.in/how-are-sports-leagues-regulated-in-india/&ved=2ahUKEwjpl62ZrvGGAXX74TgGHei-CwQQFnoECA8QAQ&usg=AOvVaw28fFePFPsTWpbV-oF_Ly9L> accessed June 23, 2024

Gaurang Kanth, 'Emergence of sports in India', (Indian Law Journal, 2017) <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.indialawjournal.org/archives/volume3/issue_2/article_by_Gaurang.html&ved=2ahUKEwjJ-Y_2h_KGAXVQ1jgGHSgiAAQQFnoECBMQAQ&usg=AOvVaw1-sWGOLzqs-IHMD-VyFugA> accessed June 23, 2024

Sports Authority of India, Ministry of Youth affairs and sports, Government of India

Vijay Pal Dalmia, 'Sports Law in India', (Monday, 12th November 2023)

<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.mondaq.com/india/sport/1386912/sports-law-in-india%23:-:text%3DThe%2520National%2520Sports%2520Policy%2520was,to%2520expand%2520the%2520overall%2520objectives.&ved=2ahUKEwj9rZfDhfOGAxVgxjgGHUgsB3QQFnoECBAQBA&usg=AOvVaw2BZV-H78GEuy6A_CvJ-D6D> accessed June 24, 2024

Ashuti Panjwani et al., 'The prevention of sports Fraud Bill, 2013: A Messiah to Indian Sports?', Volume 1 (Issue no.3) International Journal for legal development and allied issues,<<http://wp.thelawbrigade.com/wp-content/uploads/2019/05/5.pdf>> accessed June 24, 2024

Ipleaders, Zee telefilms and Ors v Union of India and Ors; 4 SCC 649 (2005)

Naman Sherstra, 'Ten cases that shaped sports law in India', (Ipleaders, December 21st, 2020)

<<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://blog.ipleaders.in/ten-cases-shaped-sports-law-india/&ved=2ahUKEwjJtLn9ufOGAxVtyqACHR6GD4gQFnoECBIQAQ&usg=AOvVaw0Scr6e7hLq-GujAD-mdPac>> accessed June 24, 2024

