

BEFORE TELANGANA REAL ESTATE REGULATORY AUTHORITY

[Under the Real Estate (Regulation and Development) Act, 2016]

SUO MOTU CASE NO. D6/939/2025

Date: 22nd June 2026

**Quorum: Sri Laxmi Narayana Jannu, Hon'ble Member
Sri K. Srinivasa Rao, Hon'ble Member**

M/s Indo Qatar Projects Pvt Ltd,
represented by its Managing Director, Mr Giri Polisetty,
Plot No.152, 3rd Floor, Mukta Elite, Kavuri Hills Phase 2 Road
Doctors Colony, Madhapur
Hyderabad- 500033

...Respondent

The matter was placed for hearing before the Authority on 06.08.2025, wherein Promoter-Respondent appeared in person. Upon hearing the submissions of the Promoter-Respondent, and upon consideration of the material available on record, this Authority proceeded to pass the following **ORDER**:

2. The present Suo motu proceedings have been initiated by the Telangana Real Estate Regulatory Authority (herein after called to as "the Authority") in exercise of powers conferred under Section 35(1) of the Real Estate (Regulation and Development) Act, 2016 (hereinafter referred to as "the RE(R&D) Act,2016"), based on the information received through representation dated 16.04.2025, received from Sri N. Ramu, resident of Burahanpura, Khammam District.

3. The representation disclosed that the Respondent "*M/s Indo Qatar Projects Pvt. Ltd*" (hereinafter referred to as "the Respondent"), had obtained layout approval for its project situated in Sy. Nos. 82/p, 83, 90/p, 91/p, 92, 107/p, 110, 111, 112/p at Ammapalem Village, Konijerla Mandal, Khammam District and had engaged in advertising, marketing, selling and inviting persons to purchase plots without registering the project with TG RERA under Section 3 of the RE(R&D) Act, 2016.

4. Pursuant to the above representation, this Authority conducted a preliminary verification of promotional materials, including brochures and advertisements published on the Respondent's official website (www.indoqatar.in). Based on prima facie evidence, which includes brochures and prospectuses on the Respondent's official website indicating advertisement and marketing of units in unregistered projects, this Authority issued Show Cause Notice No. D6/939/2025 dated 07.05.2025 to the Respondent, covering said fourteen

(14) projects, and called upon the Respondent to explain why proceedings under Sections 59 and 60 of the RE(R&D) Act, 2016, should not be initiated for contravention of Sections 3 and 4 of the RE(R&D) Act,2016.

5. In response to the Show Cause Notice, the Respondent submitted a written reply dated 04.06.2025, stating that they are in compliance with the RE(R&D) Act, 2016 and TG RE(R&D) Rules,2017 and submitted that they are holding valid registrations for multiple projects. However, the Respondent has not furnished details of the registration of each project, which are mentioned in the Show Cause Notice.

6. Upon perusal of the Respondent's reply, a personal hearing was scheduled on 04.07.2025, during which the Respondent submitted an additional written reply alleging that the petitioner is an RTI activist and routinely collects business-related data and files complaints as a means of coercion. The Respondent also submitted that the present complaint was part of a pattern of harassment and that all their projects were duly registered with TG RERA, and the relevant certificates are enclosed.

7. The Respondent also submitted an additional letter dated 26.09.2025, and has furnished comprehensive clarifications with respect to each of the projects referred to in the Show Cause Notice. It was submitted that the *Magadha, Kshetra, Dharmasthali, Pruthvi* and *Sloka Projects* have valid DTCP and RERA approvals. In respect of the *Dharani Project*, the Respondent submitted that DTCP approval has been duly secured and that the RERA application fee has been paid. The Respondent denied any connection with the *Indrasena Project*, asserting that it does not belong to them and that they have no knowledge of its ownership. With regard to the *Pranamam Project*, the Respondent clarified that it is owned by one Mr. Thummala Yugandhar, S/o Sri Thummala Nageswara Rao, and that the Respondent's role is limited to marketing activities, with all sale proceeds being directly credited to the owner's account. The Respondent submitted that their valid Real Estate Agent Registration Certificate has been submitted to substantiate the Respondent's position as a Real Estate Agent, in respect of the said project.

8. The Respondent further submitted that the *Indraprastha Project* is a DTCP-approved layout owned by Greenland Developers, Khammam, which commenced development in 2015, prior to the enactment of the RE(R&D) Act, 2016. It was submitted that due to disputes with the landowners in the Indraprastha Project, the development has been halted and the matter is presently sub judice before the Khammam District Court and the Commercial Court, Ranga Reddy District. As regards completed projects, namely *Rajahamsa* and *Vaikunthapuram*, the

Respondent clarified that these projects were undertaken by Greenland Developers, Khammam, and were completed in 2016, prior to the enactment of the RE(R&D) Act, 2016. The Respondent submitted that they had only purchased plots in these projects and subsequently resold them to customers.

9. The Respondent, with respect to upcoming projects, stated that lands for *Janmabhoomi*, *Manoharam*, *Hastina*, and *Dhruva* projects have been purchased and registered in the company's name, and that applications for SUDA layout approvals for the *Janmabhoomi* and *Dhruva* projects have already been submitted. The Respondent further submitted that no plot sales, brochures, or monetary collections have been undertaken for these upcoming projects, and that their names were only displayed on the company's website. Upon receipt of the notice from this Authority, the Respondent took immediate corrective measures by removing all such references to the upcoming projects from the website.

Observations of the Authority:

10. This Authority observes that the allegations concerning the personal conduct or motivations of the Complainant fall outside the scope of adjudication under the RE(R&D) Act, 2016. This Authority is not the appropriate forum to determine the veracity of such personal allegations or to adjudicate on the propriety of actions undertaken by individuals in their private or activist capacities.

11. Upon examination of the statutory approvals, RERA registration certificates, and submissions made by the Respondent, it is evident that the projects, namely Magadha (P02400008668), Kshetra (P00800009625), Kshetra 2(P00800009625), Dharmasthali (P00800005757), Dharmasthali Phase – II (P00800006190), Pruthvi (P00800005756), and Sloka (P00800008857), possess valid RERA registration. Hence, no liability arises for the above-said projects under the RE(R&D) Act, 2016.

12. It is also observed that the Respondent submitted that the Indrasena Project does not belong to the Respondent, and no material has been placed on record to indicate their involvement in its ownership or development. Hence, no liability arises for this also project under the RE(R&D) Act, 2016.

13. With respect to the *Pranamam Project*, it has been submitted that the said project belongs to Mr. Thummala Yugandhar. The Respondent has submitted that their role was limited to providing marketing services and has furnished Real Estate Agent Registration Certificate in support of their claim. However, it is noted that the said Certificate was issued on 25.06.2025,

whereas the *Pranamam Project* obtained its RERA registration on 22.06.2024. This indicates that the Respondent engaged in marketing activities prior to obtaining registration as a Real Estate Agent. This amounts to violation of Section 9 of the RE(R&D) Act, 2016. Section 9 of the RE(R&D) Act, 2016 read thus:

9. (1) No real estate agent shall facilitate the sale or purchase of or act on behalf of any person to facilitate the sale or purchase of any plot, apartment or building, as the case may be, in a real estate project or part of it, being the part of the real estate project registered under section 3, being sold by the promoter in any planning area, without obtaining registration under this section.

(2) Every real estate agent shall make an application to the Authority for registration in such form, manner, within such time and accompanied by such fee and documents as may be prescribed.

(3) The Authority shall, within such period, in such manner and upon satisfying itself of the fulfillment of such conditions, as may be prescribed—

(a) grant a single registration to the real estate agent for the entire State of Union territory, as the case may be;

(b) reject the application for reasons to be recorded in writing, if such application does not conform to the provisions of the Act or the rules or regulations made thereunder:

Provided that no application shall be rejected unless the applicant has been given an opportunity of being heard in the matter.

(4) Whereon the completion of the period specified under sub-section (3), if the applicant does not receive any communication about the deficiencies in his application or the rejection of his application, he shall be deemed to have been registered.

(5) Every real estate agent who is registered as per the provisions of this Act or the rules and regulations made thereunder, shall be granted a registration number by the Authority, which shall be quoted by the real estate agent in every sale facilitated by him under this Act.

(6) Every registration shall be valid for such period as may be prescribed, and shall be renewable for a period in such manner and on payment of such fee as may be prescribed.

(7) Where any real estate agent who has been granted registration under this Act commits breach of any of the conditions thereof or any other terms and conditions specified under this Act or any rules or regulations made thereunder, or where the Authority is satisfied that such registration has been secured by the real estate agent through misrepresentation or fraud, the Authority may, without prejudice to any other provisions under this Act, revoke the registration or suspend the same for such period as it thinks fit:

Provided that no such revocation or suspension shall be made by the Authority unless an opportunity of being heard has been given to the real estate agent

14. The Authority observes that the Respondent commenced marketing the *Pranamam Project* without being registered as a Real Estate Agent and notes that, under the statutory framework, registration is a mandatory prerequisite for undertaking any promotional or marketing activities. Accordingly, the Respondent is liable for failing to obtain Real Estate Agent registration before marketing the aforesaid project.

15. With respect to the Indraprastha, Rajahamsa, and Vaikunthapuram Projects, the Respondent has submitted that these projects were completed prior to the commencement of the RE(R&D) Act, 2016, and were developed by M/s Greenland Developers. However, upon examination of the documents furnished, it is evident that the Respondent had entered into a Development Agreement-cum-General Power of Attorney with M/s Greenland Developers for the Indraprastha Project on 20.05.2015. Beyond this, no other documentary evidence has been provided to establish the timeline, stage of development, or the manner in which the said projects were executed. With respect to the Rajahamsa Project, the Authority has observed that the Respondent has purchased a total of 78 plots admeasuring 17,315 sq. yards (approximately 14,478 sq. meters) in a lump sum on 29.12.2016, 10.03.2017 and 27.10.2017. It is noted that the said Project is unregistered and the Respondent is actively engaged in several Real Estate development projects. Considering the scale of the acquisition and his ongoing involvement in similar ventures, it is evident that the purchase was not intended for personal use but for commercial purposes, with the intention of selling or further developing the plots. Hence, the Authority finds that the Respondent's activities in relation to the Rajahamsa Project bear the characteristics of a promoter under the RE(R&D) Act, 2016. Hence, it is liable under Section 3 for selling plots that are unregistered with RERA.

16. With respect to the Vaikunthapuram Project, the Authority has observed that the Respondent has purchased the entire venture comprising 274 plots, admeasuring a total of 64,006 sq. yards (approximately 53,517 sq. meters). It is noted that the said project remains unregistered under the provisions of the RE(R&D) Act, 2016. The Authority further notes that the Respondent is actively engaged in multiple real estate development ventures, and it is evident that the purchase in lump sum was made for commercial purposes, with the intention to sell, market, or further develop the plots. The total area and number of plots clearly exceed the threshold limits prescribed under Section 3 of the RE(R&D) Act, 2016. Hence, in the above-mentioned projects, namely Indraprastha, Rajahamsa, and Vaikunthapuram, the Respondent is liable under Section 3 of the RE(R&D) Act, 2016.

17. With respect to the Dharani Project, the Respondent has submitted that DTCP approval has been obtained and that the RERA registration fee has been paid, however, it is evident from the records that the Respondent has been marketing the project without obtaining RERA registration, which is a prerequisite under the Section 3 of the RE(R&D) Act, 2016. Further, with respect to the upcoming projects, namely Janmabhoomi, Manoharam, Hastina, and Dhruva, the Respondent has submitted that the lands have been purchased and registered in the company's name and that applications for SUDA layout approval have been made; nonetheless,

RERA registration for these projects has not been obtained. Despite this, the Respondent has actively promoted and marketed these projects on their website. Considering these facts, it is clear that the Respondent has engaged in advertising and marketing of the Dharani, Janmabhoomi, Manoharam, Hastina, and Dhruva projects without securing the mandatory registration, which amounts to direct violation of Section 3 of the RE(R&D) Act, 2016, and is accordingly liable under the provisions of the RE(R&D) Act, 2016.

18. Section 3 of the RE(R&D) Act, 2016, constitutes the foundational provision of the statutory framework regulating real estate activities. The legislative mandate is explicit, no promoter is authorised to advertise, promote, solicit bookings, sell, or offer for sale any plot, apartment, or building within a real estate project, or any portion thereof, situated in a designated planning area, unless the project has been registered with the RE(R&D) Act, 2016. Section 3 of the RE(R&D) Act, 2016, imposes a non-derogable obligation on promoters, making registration a precondition for carrying out any commercial transactions or promotional activities in respect of a project. The provision ensures regulatory compliance, transparency in dealings, and protection of the interests of prospective allottees. Any act of marketing, sale, or offer made in the absence of registration is, therefore, ultra vires the statute and constitutes a breach of the promoter's statutory duties under the RE(R&D) Act, 2016. Section 3 of the RE(R&D) Act, 2016 read thus:

(1) No promoter shall advertise, market, book, sell or offer for sale, or invite persons to purchase in any manner any plot, apartment or building, as the case may be, in any real estate project or part of it, in any planning area, without registering the real estate project with the Real Estate Regulatory Authority established under this Act:

Provided that projects that are ongoing on the date of commencement of this Act and for which the completion certificate has not been issued, the promoter shall make an application to the Authority for registration of the said project within a period of three months from the date of commencement of this Act:

Provided further that if the Authority thinks necessary, in the interest of allottees, for projects which are developed beyond the planning area but with the requisite permission of the local authority, it may, by order, direct the promoter of such project to register with the Authority, and the provisions of this Act or the rules and regulations made thereunder, shall apply to such projects from that stage of registration.

(2) Notwithstanding anything contained in sub-section (1), no registration of the real estate project shall be required—

(a) where the area of land proposed to be developed does not exceed five hundred square meters or the number of apartments proposed to be developed does not exceed eight inclusive of all phases:

Provided that, if the appropriate Government considers it necessary, it may, reduce the threshold below five hundred square meters or eight apartments, as the case may be, inclusive of all phases, for exemption from registration under this Act;

(b) where the promoter has received completion certificate for a real estate project prior to commencement of this Act;

(c) for the purpose of renovation or repair or re-development which does not involve marketing, advertising selling or new allotment of any apartment, plot or building, as the case may be, under the real estate project.

Explanation.—For the purpose of this section, where the real estate project is to be developed in phases, every such phase shall be considered a stand alone real estate project, and the promoter shall obtain registration under this Act for each phase separately.

19. The Authority observes and notes that the Respondent has advertised, marketed, and offered for sale the projects Indraprastha, Rajahamsa, Vaikunthapuram, Dharani, Janmabhoomi, Manoharam, Hastina, and Dhruva without obtaining the requisite registration under the RE(R&D) Act, 2016. By undertaking promotional and sales activities without registration, the Respondent has acted in direct contravention of Section 3 of the RE(R&D) Act, 2016, thereby undermining the regulatory framework established to ensure transparency, accountability, and protection of the interests of homebuyers.

Directions of the Authority:

20. In the light of the foregoing observations and findings, and in exercise of the powers conferred under Sections 35, 37 and 38 of the Real Estate (Regulation and Development) Act, 2016, this Authority hereby issues the following directions:

- a) For violation of the provisions of Section 3 of the RE(R&D) Act, 2016, i.e., for failure to register the projects, namely Indraprastha, Rajahamsa, Vaikunthapuram, Dharani, Janmabhoomi, Manoharam, Hastina and Dhruva with the Authority, the Respondent is liable for imposition of penalty under Section 59 of the RE(R&D) Act, 2016. Accordingly, a penalty of Rs. 30,66,511/- (Rupees Thirty Lakhs Sixty Six Thousand Five Hundred and Eleven only) is hereby imposed upon the Respondent for the said violation. Further, for violation of Section 9 of the RE(R&D) Act, 2016, i.e., for facilitating the sale or purchase of a real estate project, namely “Pranamam Project”, without obtaining registration as a Real Estate Agent, the Respondent is liable for penalty under Section 61 of the RE(R&D) Act, 2016. Accordingly, a penalty of Rs. 7,96,757/- (Rupees Seven Lakhs Ninety-Six Thousand Seven Hundred and Fifty-Seven only) is hereby imposed upon the Respondent for the said violation. Thus, a consolidated penalty of Rs. 38,63,268/- (Rupees Thirty-Eight Lakhs Sixty - Three thousand Two Hundred and Sixty-Eight only) is imposed upon the Respondent. The Respondent is directed to remit the said penalty amount within a period of 30 days from the date of this Order in favour of the TGRERA FUND through a Demand Draft or by way of online payment to A/c No. 50100595798191, HDFC Bank, IFSC Code: HDFC0007036.
- b) The Respondent-promoter shall not advertise, market, book, sell or offer for sale, or invite persons to purchase in any manner any plot, apartment or building, as the case

may be, in any real estate project or part of it without registering the concerned project under Section 3 of the RE(R&D) Act, 2016.

- c) The Respondent is further directed to remove or discontinue any advertisements or promotional material already published, whether online or offline, in respect of unregistered real estate projects, within seven (7) days from the date of this order and to submit a compliance report before this Authority within ten (10) days thereafter.
- d) The Respondent shall not facilitate, assist, or participate in the sale of any real estate project that is not registered with this Authority. The Respondent is further restrained from engaging in any form of advertisement, marketing, selling, booking, or from inviting persons to purchase or invest in any such real estate project that falls within the ambit of Section 3 of the RE(R&D) Act, 2016, unless the said project has been duly registered under the RE(R&D) Act, 2016.
- e) The Respondent is hereby informed that failure to comply with the directions issued herein shall attract further penal consequences under Section 63 of the RE(R&D) Act, 2016.

**Sd/-**
Sri K. Srinivasa Rao,
Hon'ble Member,
TG RERA

**Sd/-**
Sri Laxmi Narayana Jannu,
Hon'ble Member,
TG RERA