

**BEFORE TELANGANA REAL ESTATE REGULATORY AUTHORITY**

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

***SUO MOTU CASE NO. D6/274/2025***

***Date: 28<sup>th</sup> November 2025***

**Quorum:** **Dr. N. Satyanarayana, IAS (Retd.), Hon'ble Chairperson**  
**Sri K. Srinivasa Rao, Hon'ble Member**  
**Sri Laxmi Narayana Jannu, Hon'ble Member**

***M/s Aduri Infra Pvt. Ltd.***

*(Rep. by Aduri Ramanjaneyulu, Managing Director,  
Plot No. 14, 3<sup>rd</sup> floor, Phase-V, KPHB colony,  
Kukatpally, Medchal District, Telangana - 500072 )*

***... Respondent***

The present Suo motu proceedings have been initiated by the Telangana Real Estate Regulatory Authority (hereinafter referred to as "the Authority"), in exercise of powers conferred under Section 35(1) of the Real Estate (Regulation and Development) Act, 2016 (hereinafter "RE(R&D) Act, 2016") after information and material placed before this Authority indicated that M/s Aduri Groups (Aduri Infra Private Limited) had engaged in advertising and marketing of several real estate undertakings across various locations (Bengaluru, Mumbai, Warangal, Vijayawada Highways and Hyderabad) on its official platform [www.adurigroup.com](http://www.adurigroup.com) without registration of certain projects with this Authority.

2. On Scrutiny of the contents of the information and material placed before this Authority, and also as per the information available on the website of this TG RERA, it has come to light that M/s Aduri Infra Pvt. Ltd., represented by its Chairman and MD, Sri. Aduri Ramakrishana had engaged in advertising, marketing, selling, and inviting prospective buyers to purchase flats in the following projects through their official website.

- i. Aduri's Dream Valley 2-Shadnagar
- ii. Aduri's Dream Valley 3-Shadnagar
- iii. Aduri's Dynamic County, Phase - I
- iv. Aduri's Dynamic County, Phase-II
- v. Aduri's Abharana Enclave-Yadadri Bhongiri
- vi. Aduri's RK-Enclave-Ghatkesar
- vii. Aduri's Rayan Enclave-Bibinagar.
- viii. Aduri's Paradise-2
- ix. Aduri's Medha Country - Koheda and Shadnagar.

3. This Authority, in exercising of powers conferred under Section 35(1) of the RE(R&D) Act, 2016, issued Show Cause Notice No.274/2025 dated 20.02.2025 to Respondent, directing

them to submit an explanation within seven days from the date of receipt of the notice, as to why this Authority should not impose a penalty under Sections 59 and 60 of the RE(R&D) Act, 2016 for contravening Sections 3(1) and 4(1) of the RE(R&D) Act, 2016 by not registering the above said projects.

4. In response to the Show Cause Notice, the Respondent, M/s Aduri Infra Pvt. Ltd., submitted that all its projects have been duly registered with the Telangana Real Estate Regulatory Authority (TG-RERA) and that all necessary approvals and permissions have been obtained in compliance with the provisions of the RE(R&D) Act, 2016. It was also submitted that there has been no violation of Sections 3 and 4 of the RE(R&D) Act, 2016, on their part. The Respondent further submitted that to substantiate compliance, they have enclosed project-specific details of approvals granted by the respective authorities, along with supporting documents such as project-wise TLP approvals and project layout copies. The Respondent also sought an additional period of two weeks to submit the quarterly compliance report as mandated under the RE(R&D) Act, 2016. The Respondent submitted the project-wise details as detailed below:

Sl.No.	Project Name	Reply submitted
i.	Adhuri's Dream Valley 2, Shadnagar	Farm Land Projects and don't fall under the purview of the RE(R&D) Act, 2016.
ii.	Adhuri's Dream Valley 3, Shadnagar	Farm Land Projects and don't fall under the purview of the RE(R&D) Act, 2016.
iii.	Aduri's Dynamic County Phase-I	Aduri's Dynamic County Phase- I - DTCP approval No. TLP No.91/2022/H. The applicant's names are Sarvesh Somani and Monica Saomani. They discontinued all marketing operations related to the said project, and compliance-related matters are managed by the applicant/developer.
iv.	Aduri's Dynamic County Phase- I and II, Chinnakandurkur GP, Yadadri	Aduri's Dynamic County Phase- II - DTCP vide TLP No.99/2022/H. Name of the applicant: Sri. Srinivas Estates. They replied that they had discontinued all marketing operations related to the said project.
v.	Aduri's Abharana Saduvelle Yadadri Bhongiri	RERA project Reg. No. P02000007799. Name of the applicant: Hari Infra Project. They replied that they had discontinued all marketing operations related to the project.
vi.	Aduri's RK Enclave, Ghatkesar	RERA Reg No.P02200004192 Name of the applicant:K.Ramesh and K.Krupakar Reddy. They

		replied that they had discontinued all marketing operations related to the said project
vii.	Aduri's Rayan Enclave, Bibinagar, Yadadri	HMDA project approval No. vide LPNo.000177/LO/Plg/HMDA/2021. Name of the applicant : Bokka Jaipal Reddy & others. They replied that they had discontinued all marketing operations related to the said project.
viii.	Aduri's Paradise-2	RERA Reg No.P02400008200 Name of the applicant: Haritha Bhoomi Developers. They replied that they had discontinued all marketing operations related to the said project
ix.	Aduri's Medha County, Koheda and Shadnagar.	HMDA project approval No. vide LPNo.000177/LO/Plg/HMDA/2021. Name of the applicant: Arpan Realtors and Developers. They replied that they had discontinued all marketing operations related to the said project

5. Upon consideration of the reply submitted by M/s Aduri Infra Pvt. Ltd., this Authority has decided to hear the matter, and accordingly, a notice of hearing dated 15.04.2025 was issued, directing the Authorised Signatory of M/s Aduri Infra Pvt. Ltd. to appear before this Authority on 17.04.2025, along with all supporting documentary evidence. On 17.04.2025, Sri Krishna, Advocate, appeared for M/s Aduri Infra Pvt. Ltd. and submitted that the Respondent is engaged solely in marketing the projects of other developers and holds registration as a Real Estate Agent under TG-RERA.

6. Subsequently, on 22.04.2025, the Chairman of M/s Aduri Infra Pvt. Ltd. appeared and submitted a written response stating that the company is registered as a Real Estate Agent bearing Registration No. A02200001365, valid from 20.02.2021 to 22.02.2026, and also submitted that all digital media advertisements relating to the identified projects had been withdrawn. The Authority directed the Respondent to file an affidavit confirming withdrawal of all advertisements and adjourned the matter to 02.05.2025. On 02.05.2025, counsel for the Respondent appeared; however, no affidavit was submitted in respect of two farmland projects, namely Aduri Dream Valley 2 and Aduri Dream Valley 3, nor was an affidavit filed confirming cessation of all related advertisements. Upon request for additional time, the Authority adjourned the matter to 12.05.2025 for further compliance.

7. During the hearing on 12.05.2025, the counsel for M/s Aduri Infra Pvt. Ltd. appeared and filed an affidavit on behalf of the Respondent, wherein it was submitted that Mr. Aduri Ramanjaneyulu, Managing Director of the Company, is duly authorized to affirm and file the affidavit. The Respondent submitted that the affidavit is filed in connection with the ongoing real estate projects, namely Aduri's Dream Valley 2 & 3. It was affirmed that the Company holds the

regulatory framework and objectives of the RE(R&D) Act, 2016, in the highest regard and remains committed to full compliance. The affidavit also mentioned that all advertisements relating to the unregistered projects have been immediately discontinued across all platforms, and a comprehensive internal compliance audit has been undertaken to revise all promotional materials to clearly reflect the promoter's identity along with the valid RERA registration number.

8. The Respondent also submitted that its role in all future communications shall be solely as a marketing agent, identified with its valid RERA Agent Registration Number, and that any promotional references to agricultural land or clubhouse amenities have been withdrawn, as such content was based solely on representations made by the promoter, and no independent marketing or sale was conducted by the Company. The Respondent affirmed that these actions were undertaken in good faith, with a commitment to transparency, accountability, and lawful conduct, and submitted relevant documents related to Aduri's Dream Valley 2 & 3 agricultural land sale deeds.

**Observations of the Authority:**

9. The Authority has considered the show cause notice, the reply filed on behalf of M/s Aduri Infra Private Limited, the affidavit dated 12.05.2025, the sale deed dated 27.02.2024, the photos and printouts of the Respondent's website, submissions of the Respondent's counsel and such other material placed on record. The Respondent is admittedly registered with this Authority as a real estate agent bearing Registration No. A02200001365 valid from 20.02.2021 to 22.02.2026. It is also the Respondent's case that it has been engaged in marketing operations in relation to a number of projects which are described on its website under the style and brand "Aduri's ..."

10. A scrutiny of the promotional material published and exhibited by the Respondent unmistakably demonstrates that several projects are prominently and consistently presented under the "Aduri's ..." brand. The manner in which such projects are portrayed on the Respondent's own digital platform cannot be characterised as an incidental reference but represents a deliberate and sustained strategy to associate the projects with the Respondent's corporate identity. The branding is manifestly designed to create and perpetuate the impression that the projects are conceived, developed or owned by the Respondent.

11. The Respondent seeks to contend that two projects, namely “Aduri’s Dream Valley 2” and “Aduri’s Dream Valley 3” at Shadnagar, are merely agricultural or farm land transactions outside the purview of the Real Estate (Regulation and Development) Act. This contention is wholly unsustainable in light of the material on record. The website pages produced by the Respondent display plot-wise layout maps, an interactive booking tab for plots, statements of the total number of plots and their status (available, allotted, mortgaged and reserved), and descriptions of common amenities which include, inter alia, a club house and a swimming pool. For Dream Valley 2 the records disclose 575 plots of which 249 are shown as allotted and 154 as available; for Dream Valley 3 the records disclose 518 plots with 91 allotted and 326 available. Such features and conduct are quintessential indicia of a development of land into plotted layouts with amenities and systematic allotment to multiple purchasers.

12. Section 2(zn) of the RE(R&D) Act defines a “real estate project” to include the development of land into plots for the purpose of selling such plots and expressly encompasses the common areas, development works, improvements and structures thereon. Applying this statutory definition to the facts at hand, it is evident that “Dream Valley–2” and “Dream Valley–3” fall squarely within the ambit of a real estate project. The Respondent’s attempt to characterise these undertakings as mere agricultural land transactions is wholly contradicted by its own promotional material, the plot-wise layouts displayed on its website, and the allotment data showing systematic sale of plots. The Respondent’s conduct, in projecting the projects as agricultural land while simultaneously offering plotted layouts for sale, appears to be a deliberate attempt to circumvent the mandatory registration requirement under Section 3 of the RE(R&D) Act by disguising a plotted development as agricultural land.

13. Furthermore, the sale deed dated 27.02.2024 placed on record establishes that M/s Aduri Infra Private Limited is the landowner of an extent of 2.0900 acres forming part of these very projects, which has been developed and offered as plotted layouts. Once the Respondent is the landowner who is a person who develops land into a project for the purpose of selling, it clearly answers the statutory description of “promoter” under Section 2(zk) of the RE(R&D) Act. The Respondent’s plea that the advertisements and promotional features were introduced based on representations of some third-party promoter is, therefore, not only implausible but stands exposed as deceptive and legally untenable.

14. By advertising, marketing, inviting bookings and effecting allotments of plots in Dream Valley-2 and Dream Valley-3 in lieu of agricultural land, while simultaneously developing the

land into plotted layouts, the Respondent has engaged in a deliberate attempt to circumvent the mandate of Section 3 of the RE(R&D) Act. The Authority cannot remain oblivious to the fact that both projects squarely fall within the definition of a “real estate project” under Section 2(zn) of the Act, especially in view of the amenities proposed and showcased, such as a club house, swimming pool, guest house and related common facilities. The Respondent, being the landowner of 2.09 acres forming part of the project land, cannot escape the regulatory purview of this Authority by merely describing the land as agricultural or “farm land.” The nature, functionality, amenities and the manner in which the project has been marketed leave no doubt that the activity undertaken is that of a real estate project and not agricultural use. The plea of lack of jurisdiction is therefore unsustainable. The Authority is of the considered view that the Respondent has indulged in unfair trade practices with an intention to circumvent the statutory regime under the RE(R&D) Act. Even assuming the land was not converted from agricultural to non-agricultural use, such description appears to have been adopted only to mislead statutory authorities, while the actual project activity reflects all attributes of a real estate project mandatorily requiring registration. Accordingly, the Authority holds that the Respondent is in clear violation of Sections 3 and 4 of the RE(R&D) Act, and the said contraventions attract the punitive consequences stipulated under the said Act.

15. The Authority further observes that in relation to other projects which the Respondent admits are not registered specifically, Aduri’s Dynamic County Phase–I, Aduri’s Dynamic County Phase–II, Aduri’s Rayan Enclave and Aduri’s Medha County, the Respondent’s defence consists of the bare contention that it confined itself to marketing activities and has now discontinued marketing. Such an assertion does not exculpate the Respondent. Section 10(a) of the RE(R&D) Act casts a continuing duty on registered real estate agents to refrain from facilitating the sale or purchase of any plot, apartment or building in a project required to be registered but which is not so registered. The statutory obligation is not evaded by a real estate agent’s subsequent withdrawal of marketing activity. Earlier facilitation, advertising and solicitation of bookings in an unregistered project constitute actionable contraventions for which the real estate agent remains liable.

16. More troubling is the fact that the projects in question were uniformly marketed under the Respondent’s “Aduri’s ...” label, thereby creating the misleading impression that the projects belonged to or were promoted by M/s Aduri Infra Private Limited. Such re-branding and misrepresentation offend the statutory duties of a real estate agent and amount to an unfair trade practice. Section 10(c)(i)(B) and (C) of RE(R&D) Act proscribe wrongful statements and

representations that mislead the public as to the character, source or nature of the services or projects being promoted. The Respondent's conduct in this regard is a clear breach of those statutory proscriptions.

17. With respect to projects which are indisputably registered under the RE(R&D) Act in the names of other promoters namely Aduri Abharana Saduvelle (registered as P02000007799 in the name of Hari Infra Projects), Aduri's RK Enclave (registered as P02200004192 in the name of K. Ramesh & K. Krupakar Reddy) and Aduri's Paradise-2 (registered as P02400008200 in the name of Haritha Bhoomi Developers) the Respondent has nevertheless held out and marketed these projects under its own "Aduri's ..." banner. Such conduct obfuscates the true identity of the promoter and registrant and deprives prospective purchasers of critical information that the statute requires to be disclosed prominently, namely, the project registration number and the Authority's website address. The Respondent's re-branding of third-party registered projects is therefore a further instance of misrepresentation and amounts to conduct the RE(R&D) Act was designed to prevent.

18. The affidavit dated 12.05.2025 filed by the Respondent contains undertakings that the offending advertisements have been withdrawn and that future communications would clearly disclose the Respondent's role as a marketing agent along with the correct registration particulars. The Authority has, however, verified the Respondent's website subsequent to the filing of that affidavit and finds that the project listings and promotional content remain in place. This persistence of the offending material despite a solemn undertaking given to this Authority demonstrates non-compliance and a disregard of the Authority's processes. Such conduct undermines the confidence reposed by members of the public in the RERA regime and signals a cavalier approach to statutory obligations.

19. The scheme and legislative intent of the RE(R&D) Act mandates strict compliance by both promoters and agents with registration and disclosure obligations so that purchasers may make informed choices. Section 11(2) requires that any advertisement or prospectus issued by a promoter must prominently display the Authority's website and the project registration number. A registered real estate agent is expected to advance the purposes of the RE(R&D) Act and cannot, by subterfuge or re-branding, erode the safeguards the statute confers upon purchasers.

20. For the reasons recorded above, the Authority finds that the Respondent has, by its actions and omissions, committed material and persistent violations of the provisions of the RE(R&D) Act. The Respondent's conduct comprises:

- (a) conversion and development of land into plotted projects which have been offered for sale without obtaining registration under Sections 3 and 4;
- (b) facilitation, marketing and inviting bookings in projects which were not registered, thereby breaching Section 10(a) in its capacity as a registered real estate agent;
- (c) misrepresentation and re-branding of projects registered in the names of other promoters; and
- (d) breach of the undertaking given to the Authority by continuing to host and display the offending advertisements

21. Having regard to the material on record and the admitted conduct of the Respondent, the Authority holds that the violations committed are grave, wilful and deliberately calculated to circumvent the statutory framework. Such conduct attracts penal consequences under Sections 59 and 61 of the RE(R&D) Act.

22. The Respondent is directed forthwith to cease and desist from advertising, marketing, offering for sale, inviting bookings, facilitating allotments or undertaking any act of promotion in respect of Dream Valley–2 and Dream Valley–3 and any other project which has not been duly registered with this Authority. The Respondent is further directed to remove with immediate effect from all online and offline platforms any promotional material that brands third-party registered projects under the “Aduri’s ...” label and to forthwith publish and display on its website the correct registration particulars and the identity of the true promoters in respect of each project for which it is engaged in marketing activities.

23. The Authority places the Respondent on notice that any further instance of advertising or promotion of unregistered projects, any recurrence of misrepresentation as to promoter identity, any breach of the statutory disclosure requirements, or any continuance of the practice of re-branding projects under the Respondent’s label will be treated as contumacious conduct warranting declaration of the Respondent as a defaulter under the RE(R&D) Act;

**Directions of the Authority:**

24. In 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) This Authority, upon a comprehensive appraisal of the record, is satisfied that the Respondent has committed grave and deliberate violations of Sections 3, 4 and 10 of the RE(R&D) Act in a total of nine (9) projects. The Respondent has engaged in the development of land into plotted layouts and effected allotments without obtaining mandatory registration in respect of two (2) projects; has facilitated the sale and

marketing of four (4) unregistered projects despite holding registration as a real estate agent; has misrepresented the identity of three (3) registered projects by branding third-party registered projects under its own corporate title; and has continued to publish and maintain offending advertisements even after giving a solemn undertaking to this Authority. These actions constitute wilful contraventions and unfair trade practices which undermine the legislative objective of transparency, accountability, and consumer protection embodied under the RE(R&D) Act.

- b) The Respondent, in respect of the undertakings styled as “Dream Valley-2” and “Dream Valley-3”, is held to be a promoter within the meaning of Section 2(zk) of the RE(R&D) Act, and the said undertakings are categorically held to be “real estate projects” within the meaning of Section 2(zn) of the RE(R&D) Act. Although projected as agricultural land transactions, the material on record establishes that the Respondent has developed the land into plotted layouts, created amenities, and has advertised, marketed, invited bookings and effected allotments of plots. Such activities fall squarely within the statutory definition of a real estate project and reveal a deliberate attempt to circumvent the mandatory registration requirements under Section 3 of the RE(R&D) Act. Accordingly, if the Respondent intends to engage in any advertisement, marketing, booking, allotment, sale or invitation to purchase plots in these projects, it shall take steps for registration under Sections 3 and 4 of the RE(R&D) Act. Until such registration is duly granted there shall remain an absolute embargo on any form of advertisement, marketing, solicitation, booking or sale relating to these two projects
- c) The Respondent is further directed to immediately refrain from branding, renaming, projecting, advertising or marketing any registered project under the “Aduri’s ...” label or under any name other than the name in which such project stands registered with this Authority. The Respondent shall, within seven days from receipt of this order, restore the registered project names to their correct statutory titles across all online and offline media under its control and shall prominently display the correct RERA registration number and promoter name in every advertisement, communication or representation as mandated under Section 11(2) and Section 10 of the RE(R&D) Act.
- d) For the violations of Sections 3 and 4 committed in respect of “Dream Valley-2” and “Dream Valley-3”, the Respondent is held liable for penalty under Section 59 of the RE(R&D) Act. For the violations of Section 10, comprising the facilitation and marketing of four (4) unregistered projects, namely Aduri’s Dynamic County Phase-I, Aduri’s Dynamic County Phase-II, Aduri’s Rayan Enclave, and Aduri’s Medha County, and the

misrepresentation in respect of three (3) registered projects, namely Aduri's Abharana (Saduvelli GP), Aduri's RK Enclave, and Aduri's Paradise-2, the Respondent is further liable for penalty under Section 61 of the RE(R&D) Act. Having regard to the gravity, continuity, extent and nature of the breaches, and in order to maintain deterrence and uphold the integrity of the regulatory framework, this Authority hereby imposes a consolidated penalty of ₹53,32,733/- (Rupees fifty-three lakh thirty-two thousand seven hundred and thirty-three only) upon the Respondent, payable within thirty (30) days from the date of receipt of this order.

- e) The Respondent is placed on clear notice that any future act of misrepresentation, any marketing or facilitation of sale of unregistered projects, any rebranding or renaming of registered projects, or any departure from statutory disclosure requirements shall be treated as a wilful and aggravated violation of the RE(R&D) Act. In such circumstances, this Authority shall not hesitate to declare the Respondent a defaulter, initiate proceedings for suspension or cancellation of its real estate agent registration, and impose such further penal and regulatory consequences as are permissible under law.

25. 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 Laxminarayana Jannu,**  
Hon'ble Member,  
TG RERA

Sd/-  
**Dr. N. Satyanarayana, IAS** (Retd.),  
Hon'ble Chairperson,  
TG RERA