

BEFORE TELANGANA REAL ESTATE REGULATORY AUTHORITY

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

SUO MOTU CASE NO. 18/2026

Date: 23rd June 2026

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

M/s E Avenues Cyberabad LLP,
Rep. by Sri Sanapalli Saneeth Reddy,
Sy.No.161, Manchirevula
Rajendranagar, Ranga Reddy District,
Telangana – 500089.

...Promoter/Respondent

ORDER

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 referred to as "the RE(R&D) Act, 2016"), consequent upon verification of advertisements published in print media relating to the project styled as "ECO-NEST", promoted by M/s E Avenues Cyberabad LLP represented by its Authorised Signatory Sri Sanapalli Saneeth Reddy (hereinafter referred to as "the Respondent"), wherein the Respondent was found to have advertised and marketed the project in a manner allegedly inconsistent with the disclosure requirements prescribed under the RE(R&D) Act, 2016 and the directions issued by this Authority.

2. Upon verification of the advertisement material published in newspapers, it was observed that the Respondent had advertised the project as a "50 Acres Gated Community" comprising "635 Premium Villa Plots", together with a "6000 Sq.ft. Clubhouse" and "20+ Amenities", inviting members of the public to purchase plots in the said development. It was further noticed that the advertisement did not contain the statutory disclosures in the manner prescribed by this Authority vide Proceedings No.D6/2031/TGRERA/2025 dated 07.07.2025 governing advertisements issued by promoters of real estate projects. The omission of mandatory particulars prima facie disclosed non-compliance with the requirements prescribed under Section 11(2) of the RE(R&D) Act, 2016.

3. In view of the aforesaid material, this Authority issued Show Cause Notice dated 21.02.2026 calling upon the Respondent to show cause as to why action should not be initiated under the provisions of the RE(R&D) Act, 2016, for violation of Section 11(2) of the RE(R&D) Act, 2016, and for publication

of advertisements containing representations requiring examination under the provisions of the RE(R&D) Act, 2016.

4. In response to the Show Cause Notice, the Respondent, through its Authorised Signatory, submitted a reply dated 05.03.2026, submitting that the advertisement referred to in the Show Cause Notice had been inadvertently published by the newspaper agency in an incorrect and incomplete format without proper confirmation of the final advertisement content from the Respondent.

5. The Respondent further submitted that the project is duly registered with TG-RERA and that all project particulars, approvals and disclosures have been uploaded on the official TG-RERA portal. It was further contended that no allottee or prospective purchaser had suffered any loss or damage and that no complaint alleging misrepresentation or misleading advertisement had been received in relation to the project. The Respondent also submitted that the ingredients necessary for invoking action under Section 7 of the RE(R&D) Act, 2016, were not attracted in the facts of the present case and that the omission of certain particulars in the advertisement occurred due to inadvertent publication by the newspaper agency and not due to any deliberate act of suppression or concealment.

6. The Respondent further submitted that corrective measures had been undertaken to ensure future compliance and that instructions had been issued to all marketing agencies and media partners to ensure that future advertisements strictly comply with the provisions of the RE(R&D) Act, 2016 and the directions issued by this Authority.

7. Upon consideration of the reply submitted by the Respondent, this Authority deemed it appropriate to afford an opportunity of personal hearing and accordingly issued Hearing Notice dated 02.04.2026 directing the Respondent to appear before the Authority on 24.04.2026 along with all supporting documents and material in support of its contentions.

8. The matter was taken up for hearing on 24.04.2026. On the said date, the Respondent appeared through its authorised representative and reiterated the contents of the written explanation submitted earlier. The Respondent requested this Authority to consider the explanation furnished and to drop further proceedings initiated pursuant to the Show Cause Notice.

Observations of the Authority:

9. The Authority has considered the Show Cause Notice dated 21.02.2026, the reply dated 05.03.2026 submitted by M/s E Avenues Cyberabad LLP, the submissions advanced by the Respondent during the hearing conducted on 24.04.2026, the newspaper advertisement forming the basis of the

present proceedings, the records available on the TG-RERA portal, the sanctioned layout plans and approvals pertaining to the project, and all such other material available on record.

10. Upon careful scrutiny of the advertisement relied upon in the present proceedings, this Authority finds that the advertisement is not a mere informational communication intended to identify the existence of a registered project. The advertisement prominently projects the development as a "50 Acres Gated Community" comprising "635 Premium Villa Plots" together with a "6000 Sq.ft. Clubhouse" and "20+ Amenities". The nature, structure and content of the advertisement unmistakably establish that it was specifically designed to generate commercial interest, attract prospective purchasers and induce investment in the project.

11. The representations contained in the advertisement cannot be dismissed as ordinary marketing expressions. The project scale, amenities, facilities and lifestyle features have been prominently highlighted as core selling propositions. Such representations are deliberately intended to influence the purchasing decisions of members of the public and therefore carry with them a corresponding obligation of accuracy, completeness and truthfulness. The higher the degree of reliance sought to be generated amongst prospective purchasers, the greater the responsibility cast upon the promoter to ensure that the information disseminated is consistent with the records maintained before the Authority and the approvals granted by the competent authorities.

12. The Respondent has sought to contend that the omissions identified in the Show Cause Notice occurred due to inadvertent publication by the newspaper agency and that no deliberate suppression or misrepresentation was intended. This Authority is unable to accept the said contention. Beyond a bare assertion, the Respondent has failed to place on record any approved advertisement draft, communication exchanged with the newspaper agency, legal notice, email correspondence or any contemporaneous material demonstrating that the advertisement was published contrary to its instructions. A bare denial, unsupported by documentary evidence, cannot displace the contents of an advertisement admittedly issued for promoting the Respondent's project.

13. This Authority also notes that the obligations imposed under the RE(R&D) Act, 2016, are statutory in nature and cannot be delegated to or avoided through attribution of responsibility to a third-party advertising agency. A promoter who chooses to advertise a project remains responsible for every representation made to the public in relation thereto. Compliance with statutory disclosure requirements is a continuing obligation resting squarely upon the promoter and cannot be diluted by attributing omissions to an external agency.

14. This Authority further notes that vide Proceedings No.D6/2031/TGRERA/2025 dated 07.07.2025, detailed guidelines were issued governing publication of advertisements in print, electronic and social media. The said guidelines require promoters to prominently display the TG-RERA Registration Number, the permissions granted by the competent authorities, and the website address of the Authority. These disclosures are not procedural formalities but constitute an essential consumer protection mechanism enabling prospective purchasers to independently verify project particulars before making investment decisions.

15. Upon examination of the advertisement in question, this Authority finds that the mandatory disclosures were not made in the manner prescribed by this Authority. The advertisement therefore fails to satisfy the disclosure requirements contemplated under Section 11(2) of the RE(R&D) Act, 2016 and the directions issued by this Authority. Such omissions undermine the transparency obligations which constitute one of the foundational pillars of the regulatory framework established under the RE(R&D) Act, 2016.

16. However, the violations noticed in the present proceedings extend considerably beyond non-compliance with advertisement guidelines. During verification of the records maintained on the TG-RERA portal, this Authority observed that the development marketed by the Respondent is covered under two separate registrations granted by this Authority, namely Registration No. P02200002986 in respect of the project titled "ECO-NEST" and Registration No. P02200004072 in respect of the project titled "ECONEST". Although registered under slightly different nomenclatures, both registrations pertain to different phases/components of the same larger development being marketed by the Respondent. The existence of these two separate registrations is a material fact directly relevant to any person intending to purchase a plot in the project.

17. Notwithstanding the existence of two independent project registrations, the advertisement prominently disclosed only Registration No. P02200002986 pertaining to "ECO-NEST", while completely omitting any reference to Registration No. P02200004072 pertaining to "ECONEST". This omission is neither insignificant nor accidental in its effect. A prospective purchaser examining the advertisement would reasonably be led to believe that the entire development being advertised is covered under the single registration number displayed therein. Such selective disclosure conceals the existence of a separate registered phase of the development and creates an incomplete and potentially misleading understanding of the project's regulatory status, approvals and disclosures available on the TG-RERA portal.

18. The Authority is firmly of the view that a project registration number serves a critical statutory purpose. It enables purchasers to access project-specific information available on the Authority's portal, including approved plans, permissions, quarterly updates, development status and compliance disclosures. By selectively displaying only one registration number while suppressing another registration governing a substantial component of the development, the Respondent deprived prospective purchasers of complete information necessary for making an informed assessment of the project.

19. The Authority further observes that the advertisement prominently promotes the existence of "20+ Amenities" and specifically represents facilities including a Yoga and Meditation Centre, Banquet Hall and other lifestyle infrastructure. These representations were not peripheral statements but formed a central component of the marketing campaign and were clearly intended to enhance the attractiveness and perceived value of the project in the eyes of prospective purchasers.

20. Upon comparison of the advertisement material with the sanctioned layout plans and records available before this Authority, it is evident that certain amenities advertised by the Respondent do not form part of the sanctioned layout approved by the competent authorities. The Respondent has not produced any approval, revised sanction or documentary material demonstrating that the said facilities form part of the approved development. The representations made in the advertisement therefore travel beyond the sanctioned project particulars available on record.

21. This Authority cannot overlook the significance of such representations. Amenities and common facilities frequently constitute a decisive factor influencing investment decisions in plotted developments. Purchasers often evaluate projects on the basis of the infrastructure and facilities promised by the promoter. Advertising amenities which do not form part of the sanctioned layout is capable of creating an expectation regarding the nature and quality of the development that is not supported by the approved project records.

22. The Authority further notes that the Respondent has represented in its promotional material that occupancy-related approvals have been obtained and has circulated what is projected as the final layout plan of the development. However, corresponding approvals, occupancy-related documents and updated disclosures reflecting such status are not available on the TG-RERA portal. The Respondent has failed to place any material before this Authority reconciling the discrepancy between the representations made to the public and the disclosures maintained before the Authority.

23. At this juncture, it is appropriate to examine the statutory framework governing such representations. Section 12 of the RE(R&D) Act, 2016 embodies a substantive consumer protection safeguard and proceeds on the legislative recognition that prospective purchasers rely upon information disseminated through advertisements, brochures, prospectuses and promotional material while making investment decisions. The provision imposes accountability upon promoters for representations which are incorrect, false or misleading in material particulars.

24. The expression "incorrect or false statement" occurring in Section 12 cannot be construed narrowly so as to apply only to statements that are wholly fabricated. The provision extends equally to representations which are incomplete, misleading, capable of creating a false impression or likely to induce a purchaser to form an inaccurate understanding regarding the nature, approvals, amenities, status or characteristics of a project. Applying the aforesaid statutory framework to the facts established on record, this Authority finds that the Respondent, by selectively disclosing only one project registration number despite the existence of two registrations, by advertising amenities not reflected in the sanctioned layout plans and by making representations concerning occupancy-related approvals and final project status which are not supported by corresponding disclosures maintained before this Authority, has disseminated information that is incomplete, inaccurate and capable of misleading prospective purchasers in material respects.

25. The violations identified herein are not technical or procedural irregularities. They concern matters which directly influence the decision-making process of an intending allottee. The extent of project registration, the availability of promised amenities, the status of approvals and the nature of the approved development are matters of fundamental significance for any person contemplating investment in a real estate project. The integrity of the disclosure regime established under the RE(R&D) Act, 2016, depends upon the accuracy and reliability of such information.

26. For the reasons recorded hereinabove, this Authority holds that the Respondent has failed to comply with the mandatory disclosure requirements prescribed under Section 11(2) of the RE(R&D) Act, 2016 and has further disseminated promotional material containing representations which are inaccurate, incomplete and misleading in material particulars, thereby attracting the consequences contemplated under Section 12 of the RE(R&D) Act, 2016. The contraventions stand established on the basis of the material available on record. Accordingly, this Authority holds, upon due consideration of the entire evidence and submissions on record, that the Respondent has contravened the provisions of

Section 11(2) and Section 12 of the RE(R&D) Act, 2016, and is consequently liable for penal consequences under Section 61 of the RE(R&D) Act, 2016.

Directions of the Authority:

27. In light of the foregoing observations, findings and conclusions, and in exercise of the powers conferred under Sections 35, 37 and 38 of the RE(R&D) Act, 2016, this Authority hereby issues the following directions:

- a) For violation of Section 11(2) and Section 12 of the RE(R&D) Act, 2016, that is, for dissemination of advertisements and promotional material containing incomplete, inaccurate and misleading representations concerning the project registration particulars, approved amenities and project status, the Respondent is liable for penalty under Section 61 of the RE(R&D) Act, 2016. Accordingly, the Respondent is hereby directed to pay a penalty of ₹25,87,626/- (Rupees Twenty-Five Lakh Eighty-Seven Thousand Six Hundred and Twenty-Six Only) within a period of 30 (thirty) days from the date of receipt of this Order, in favour of TG-RERA, through Demand Draft or online payment to A/c No. 50100595798191, HDFC Bank, IFSC Code: HDFC0007036.
- b) The Respondent–Promoter is hereby directed to immediately cease and desist from publishing, circulating or disseminating any advertisement, brochure, prospectus, promotional material or digital content containing incomplete, inaccurate or misleading information relating to the said project or any other project undertaken by it.
- c) The Respondent shall, within 30 (thirty) days from the date of receipt of this Order, revise and rectify all advertisements, brochures, website content, social media publications and other promotional material relating to the project so as to ensure that the information contained therein is fully consistent with the records maintained before this Authority and the approvals granted by the competent authorities.
- d) The Respondent is specifically directed to prominently disclose all applicable TG-RERA Registration Numbers pertaining to the project in every future advertisement and promotional communication and shall not selectively disclose only a portion of the registration particulars in a manner capable of creating a misleading impression regarding the regulatory status of the project.

- e) The Respondent shall forthwith remove from all advertisements, brochures, promotional material and marketing communications any reference to amenities, facilities, infrastructure or project features which do not form part of the sanctioned layout plans and approved project documents submitted before the competent authorities and this Authority.
- f) The Respondent is further directed to ensure that all approvals, occupancy-related documents, project status updates, sanctioned plans and other statutory disclosures required under the RE(R&D) Act, 2016 are uploaded and maintained on the TG-RERA portal in a complete, accurate and updated manner.
- g) The Respondent shall submit a detailed compliance report before this Authority within 30 (thirty) days from the date of receipt of this Order, together with documentary evidence demonstrating compliance with the directions contained herein.

28. The Respondent is hereby informed that failure to comply with the directions issued herein shall attract further penal consequences under Section 63 of the Real Estate (Regulation and Development) Act, 2016.

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

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