

BEFORE TELANGANA REAL ESTATE REGULATORY AUTHORITY
[Under the Real Estate (Regulation and Development) Act, 2016]

SUO MOTU CASE NO. D6/648/2025

Date: 23rd June 2026

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

M/s APR Group Corporate Capital,
D. No: 20-M/69 & 69A,
North Gate No.3,
Mathrusri Nagar,
Miyapur, Hyderabad - 500049.

... 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”), on the basis of the information and material placed before this Authority, which indicated that APR Group Corporate Capital / M/s APR Groups / M/s APR Projects, represented by its Managing Partner, Sri Avula Krishna Reddy (hereinafter referred to as “the Respondent”), had engaged in advertising, marketing, and inviting prospective purchasers in respect of multiple real estate projects through its official website <https://aprinfra.com>, without ensuring registration of certain projects in its name with this Authority, thereby prima facie contravening the provisions of the RE(R&D) Act, 2016.

2. Apart from the information and material placed before this Authority, even as per the data available on the official website of TG RERA, it has become clear that the Respondent had advertised and promoted the following projects, portraying them as part of its project portfolio and inviting prospective buyers to purchase plots/villas:

- i. APR Praveen's Hillside
- ii. APR Praveen's Eterno
- iii. APR Praveen's Golden Leaf
- iv. APR Praveen's Higheria
- v. APR Praveen's Hynora
- vi. APR Praveen's Crystal Avenue

3. While so this Authority, in exercise of powers conferred under Section 35(1) of the RE(R&D) Act, 2016, issued Show Cause Notice No. D6/648/2025 dated 01.03.2025 to the Respondent, directing it to submit an explanation within seven days from the date of receipt of the notice as to why this Authority should not initiate penal proceedings 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 advertising and marketing the above-mentioned projects without obtaining requisite registration.

4. In response to the said Show Cause Notice, the Respondent, vide reply dated 20.03.2025, submitted that the term “APR Group” was being used only as a tagline for the purpose of across all projects and that no transactions had been undertaken in the name of APR Groups. It was further submitted that all payments from customers were received only into the respective RERA-designated collection accounts of APR Projects. It has further stated that out of the six projects mentioned in the notice, four projects were duly registered with TG RERA under the name of APR Projects, while the remaining two projects were registered under the names of other promoters. The Respondent also furnished copies of RERA certificates and project details in support of its submissions. The project-wise details submitted by the Respondent are as follows:

<u>Sl.No.</u>	<u>Project Name</u>	<u>Particulars of TG RERA Registration of Projects as per the Reply submitted</u>
i.	APR Praveen’s Hillside	Registered with TG RERA in the name of APR Projects (Reg. No. T02200005506).
ii.	APR Praveen’s Eterno	Registered with TG RERA (Reg. No. P01100006126).
iii.	APR Praveen’s Golden Leaf	Registered with TG RERA (Reg. No. P02400006219).
iv.	APR Praveen’s Higheria	Registered with TG RERA (Reg. No. P01100003535).

v.	APR Praveen's Hynora	Registered as an open layout under the name of another promoter, M/s Varahi Builders and Developers (Reg. No. P01100003535 – Project: Vaarahi Vaahini Enclave). Respondent stated that development agreements were executed with individual plot owners and villas were being constructed based on permissions from competent authorities.
vi.	APR Praveen's Crystal Avenue	Registered under the name of different promoter M/s Crystal Avenue (Reg. No. P02400000631). Respondent submitted that construction activities were undertaken pursuant to development agreements with plot owners.

5. Upon examination of the reply, this Authority scheduled a personal hearing on 17.04.2025. During the hearing, Sri Avula Krishna Reddy, Managing Partner of M/s APR Projects, appeared before the Authority. After considering the submissions, the Authority observed that the projects, APR Praveen's Hynora and APR Crystal Avenue, were not registered in the name of APR Groups/ APR Projects, yet were being advertised as their own projects, thereby creating a misleading impression among prospective purchasers. The Authority directed the Respondent to immediately remove all such advertisements and refrain from further promotional activities.

6. Subsequently, the Respondent filed an additional reply dated 23.04.2025 submitting that the advertisements were issued inadvertently due to lack of awareness of specific regulatory provisions. It was submitted that all related advertisements had been removed from their website and other platforms, and an undertaking was given that no future promotions would be carried out unless full compliance to made with the provisions of the RE(R&D) Act, 2016. The Respondent further asserted that no allottees were deceived and that the rights and interests of purchasers remained protected.

7. In order to verify whether any transactions had been made/executed by the Respondent in the said projects, this Authority addressed letters dated 02.07.2025 to the Sub-Registrars of Qutubullapur and Hayathnagar seeking details of registered transactions wherein the Respondent had represented themselves as promoter in the projects Vaarahi Vaahini Enclave and Crystal Avenue.

8. In response, the Sub-Registrar, Hayathnagar, vide letter dated 25.07.2025, informed that no registered transactions had taken place in the Crystal Avenue project. The Sub-Registrar, Qutubullapur, vide letter dated 05.08.2025, reported that three documents were registered in respect of Vaarahi Vaahini Enclave, pertaining to sale transactions and Development Agreements executed between landowners and developers, and none indicated execution of sale deeds by the Respondent in favour of third-party purchasers.

Observations of the Authority:

9. At the outset, it is necessary to recall the object and purpose underlying the RE(R&D) Act, 2016. The Act constitutes a comprehensive regulatory framework designed to protect the interest of consumers, promote transparency in the sale of plots, apartments, buildings and real estate projects, and establish a mechanism for speedy adjudication of disputes. Central to this scheme is the mandatory prior registration of real estate projects and promoters under Sections 3 and 4, which ensures that no project is advertised, marketed or offered for sale to the public until this Authority has had an opportunity to verify compliance with the statutory requirements. Any advertisement or invitation to purchase issued in respect of an unregistered project, or by an entity not holding the status of a registered promoter for the specific development in question, strikes at the root of this regulatory design and exposes prospective purchasers to precisely the risk the Act seeks to eliminate. It is against this backdrop that the conduct of the Respondent falls to be examined.

10. This Authority has examined the Show Cause Notice dated 01.03.2025, the Respondent's replies dated 20.03.2025 and 23.04.2025, the submissions made during the personal hearing held on 17.04.2025, the registration particulars furnished by the Respondent, the promotional material hosted on the Respondent's website, the reports of the Sub-Registrars of Hayathnagar and Qutubullapur dated 25.07.2025 and 05.08.2025 respectively, and the entire material on record

11. On facts, it stands established that the Respondent, through its official website and other promotional platforms, advertised and marketed two projects, namely APR Praveen's Hynora and APR Crystal Avenue, as part of its own project portfolio, inviting prospective purchasers to acquire villa units therein. The advertisements were not incidental or descriptive references to third-party developments; they were commercial solicitations bearing all the attributes of an offer to the public, presented under the Respondent's own brand identity.

12. The Respondent's principal defence is that four of the six projects named in the Show Cause Notice stand registered in its name, and that the two projects in question Hynora and Crystal Avenue correspond to layouts registered in the names of other promoters (M/s Varahi Builders and Developers, in respect of Vaarahi Vaahini Enclave, and M/s Crystal Avenue, respectively), with development agreements executed between such promoters and individual plot owners, pursuant to which villa construction was undertaken.

13. This defence, however, does not meet the issue that arises for determination. The question is not whether registration exists in favour of a different promoter for the underlying layout, it is whether the Respondent itself held registration authorising it to advertise, market or invite bookings for the villa units it was, in fact, offering to the public under its own name and brand. On this decisive question, the Respondent has produced no registration certificate, application or approval in its own name. The registrations relied upon stand in the names of other promoters and do not, without more, extend to or authorise the Respondent's marketing of villa units in these two projects.

14. Section 2(zk) of the RE(R&D) Act, 2016 defines “promoter” as the person responsible for the development and sale of a real estate project, and the scheme of the Act requires that the public be able to identify, with certainty, the promoter responsible for a project through this Authority's records. Section 3(1) casts a mandatory and unconditional prohibition on advertising, marketing, booking, selling or inviting persons to purchase any plot, apartment or building without prior registration; Section 4(1) prescribes the manner in which such registration is to be obtained, and Section 11(2) requires that every advertisement or prospectus issued or published by a promoter shall prominently mention the website address of the Authority, where the details of the registered project have been entered, together with the registration number obtained from the Authority and such other matters incidental thereto the underlying object being to secure transparency and to enable a prospective purchaser to verify, from the advertisement itself, the registered project and promoter behind it.

15. Even if the Respondent's case is taken at its highest, namely, that APR Praveen's Hynora and APR Crystal Avenue were merely marketing names given to villa components proposed to be developed within the already-registered layouts of Vaarahi Vaahini Enclave and Crystal Avenue that explanation does not answer why the advertisements omitted the registration number and the Authority's website address that Section 11(2) mandates. Nothing in the Act prevents a promoter from marketing a registered project under a distinct brand or project name, provided the advertisement carries the registration particulars of the project actually registered, so that a prospective purchaser can verify the connection. The Respondent's advertisements, however, carried no such particulars whatsoever

16. This omission assumes considerable significance because it was never addressed by the Respondent at any stage. Neither the reply dated 20.03.2025 nor the additional reply dated 23.04.2025 both of which deal at some length with the registration status of the six projects named in the Show Cause Notice offers any explanation as to why the advertisements for Hynora and Crystal Avenue did not carry the registration number and website address of the layout under which they are now sought to be justified. Had genuine continuity existed between the brand name used for public marketing and the registered layout now relied upon, the ordinary and expected course for a promoter acting transparently would have been to display that registration number on the very advertisement carrying the brand name. Its complete absence, coupled with the Respondent's silence on this specific aspect despite being called upon to show cause, supports the inference that what was placed before the public was projected as a distinct, freshly-launched offering in the nature of a launch or pre-launch offer under its own project identity rather than as a transparent extension of an already-registered development. This Authority need not, and does not, return a definitive finding on the Respondent's subjective intent, it suffices to hold that, on either view, the consequence is the same prospective purchasers were deprived of the verification safeguard that Section 11(2) exists to secure, and the transparency objective underlying the provision stood defeated.

17. Tested against this framework, the Respondent's conduct falls squarely within the mischief Sections 3(1) and 11(2) seek to prevent. By projecting Hynora and Crystal Avenue as its own offerings without holding registration authorising it to do so, and without displaying any registration number of its own or of the layout now relied upon, the Respondent advertised and marketed villa units in contravention of Section 3(1), failed to obtain registration as required under Section 4(1), and failed to comply with the disclosure obligation under Section

11(2) in respect of these two projects. The conduct further bears the character of an “unfair practice” within the meaning of the Explanation to Section 7(1)(c) of the Act, in that the Respondent, by advertising these projects under its own brand without holding the corresponding registration, represented an approval or affiliation which it did not in fact have.

18. The verification undertaken by this Authority through the Sub-Registrars of Hayathnagar and Qutubullapur confirms that no sale deed was registered by the Respondent in favour of any third-party purchaser in either project, the only registered documents pertain to transactions and development agreements between landowners and developers. This is a relevant mitigating circumstance in assessing the consequences that ought to follow, but it does not answer the contravention already established the offence under Section 3(1) is complete upon advertisement and solicitation, irrespective of whether a concluded sale has followed.

19. The Respondent's explanation that the advertisements were issued inadvertently, owing to unfamiliarity with the specific regulatory requirement cannot be accepted as a defence, particularly in the face of its unexplained silence on the absence of registration particulars noted above. An entity engaged in the business of real estate development and marketing is expected to be conversant with the registration and disclosure obligations attaching to such activity, and ignorance of a statutory requirement central to the Act cannot excuse non-compliance.

20. This Authority does, however, take into account that upon the matter being brought to the Respondent's notice, the impugned advertisements were withdrawn, an undertaking was furnished against further promotion in contravention of the Act, and no registered conveyance in favour of third parties has come to light. These are mitigating factors bearing upon the quantum of consequential action, and do not displace the finding of contravention itself.

21. Having regard to the nature of the contravention which is not a case of mere inadvertent omission but one where the Respondent projected itself as promoter of a project without holding the corresponding registration and, when called upon to explain the absence of registration particulars in its advertisements, offered no explanation at all this Authority is of the view that the penalty under Section 59 of the Act ought to be fixed having due regard to this aggravating feature. Additionally, the failure to comply with the disclosure obligation under Section 11(2) constitutes a distinct contravention, independent of and in addition to the non-registration under Section 3(1), and accordingly attracts penalty under Section 61 of the Act, which governs contraventions of provisions of the Act other than Sections 3 and 4.

22. For the reasons recorded above, this Authority holds that the Respondent, by advertising and marketing APR Praveen's Hynora and APR Crystal Avenue as its own projects without holding the registration required therefor, and without complying with the disclosure obligation under Section 11(2), has contravened Sections 3(1), 4(1) and 11(2) of the RE(R&D) Act, 2016, and is liable for penalty under Section 59 and, additionally, under Section 61 of the Act, subject to the mitigating factors recorded in paragraph 20.

Directions of the Authority:

25. In light of the foregoing observations and findings, 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 the contravention of Sections 3(1) and 4(1) of the RE(R&D) Act, 2016, the Respondent is liable to penalty under Section 59 of the Act and, for the independent contravention of Section 11(2), is further liable to penalty under Section 61 of the Act. Accordingly, this Authority imposes a consolidated penalty of Rs. 1,10,57,658/- (Rupees One Crore Ten Lakh Fifty-Seven Thousand Six Hundred and Fifty-Eight Only) upon the Respondent, which shall be remitted within thirty (30) days from the date of receipt of this Order in favour of "TGRERA FUND" by way of Demand Draft or through online transfer to A/c No. 50100595798191, HDFC Bank, IFSC Code: HDFC0007036.
- b) The Respondent is hereby directed to forthwith cease and desist from advertising, marketing, or offering for sale any villa units or built-up structures in projects where it has not obtained promoter registration from this Authority. The Respondent shall ensure that no real estate project is promoted in its name unless the same is duly registered in accordance with the provisions of the RE(R&D) Act, 2016.
- c) The Respondent shall immediately remove, withdraw, or suitably modify any misleading advertisements, brochures, publicity material, or digital content published in respect of APR Praveen's Hynora and APR Crystal Avenue, whether online or offline, within seven (7) days from the date of this Order, and shall submit a compliance report before this Authority within ten (10) days thereafter.
- d) The Respondent is further directed not to undertake any form of advertisement, marketing, booking, selling, or inviting persons to purchase villa units in the aforesaid

projects unless the villa component is duly registered with this Authority under the RE(R&D) Act, 2016.

- e) The Respondent shall ensure strict compliance with Section 11(2) of the RE(R&D) Act, 2016, in all future advertisements by prominently displaying the RERA registration number and the website address of the Authority, so as to enable prospective purchasers to verify project details before making any investment.
- f) 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, in addition to any other action deemed fit under the provisions of the RE(R&D) Act, 2016, Rules, and Regulations made thereunder.

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

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

