

BEFORE TELANGANA REAL ESTATE REGULATORY AUTHORITY

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

SUO MOTU CASE NO. D6/3034/2025

Date: 23rd June 2026

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

M/s. GNR Infra Developers,
Represented by Sri G. Naveen Reddy,
Reddy, R/o 114, Road No.6, Opp: Adithya School,
Vanasthali Hills, Vanasthalipuram, Hyderabad - 500074.

...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 RE(R&D) Act, 2016 (hereinafter referred to as “the RE(R&D) Act, 2016”), based on information available in the public domain including website content and promotional material which came to the notice of this Authority disclosing that M/s. GNR Infra Developers (hereinafter referred to as “the Respondent”) was advertising and offering for sale villas in a project styled as “Anvaya Villas” situated at Vanasthali Hills, Vanasthalipuram, Ranga Reddy District.

2. Upon verification of the information available on the official website of this Authority, it was observed that the project “Anvaya Villas” was not registered with TG-RERA and that no application seeking registration under Section 4 of the RE(R&D) Act, 2016, had been submitted by the Respondent in respect of the said project.

3. Further, this Authority, upon due verification of publicly accessible sources, including website content and project-related material, observed that the Respondent was promoting the said project by furnishing details such as villa configurations, pricing structure inclusive of land cost, and additional charges for location advantages such as east-facing, corner plots and park-facing units. A perusal of such material prima facie indicates promotional and marketing activity in respect of the proposed development attributable to M/s. GNR Infra Developers.

4. In view of the said prima facie material indicating engagement in advertisement and marketing of a project without registration, this Authority issued a Show Cause Notice bearing No. D6/3034/2025 dated 22.07.2025 under Sections 3 and 4 of the RE(R&D) Act, 2016, calling

upon the Respondent to explain as to why action should not be initiated for undertaking promotional and sales activities in a project that is not registered with TG-RERA.

5. In response to the Show Cause Notice issued by this Authority, the Respondent, through its Authorized Signatory Sri G. Naveen Reddy, submitted a reply dated 29.08.2025, wherein it denied the allegations and stated that each unit involved in the subject matter is an independent villa admeasuring approximately 200 square yards with individual building permissions allegedly granted by the Panchayat Raj Department. The Respondent further submitted that the villas are being constructed as standalone units under separate contracts and that the said development does not fall within the purview of the RE(R&D) Act, 2016.

6. The Respondent further submitted that no advertisement or marketing activity had been undertaken and that there were no plans to advertise the development. It was also contended that though the villas are under common ownership, there are no shared amenities or common areas and that each building is a standalone construction. The Respondent additionally claimed exemption under Section 3(2) of the RE(R&D) Act, 2016, stating that the development falls within the prescribed threshold limits and therefore does not require registration.

7. Thereafter, this Authority issued hearing notices, and the matter was listed for hearing. On one of the scheduled dates of hearing, the Respondent failed to appear and submitted a letter citing reasons for non-attendance. Subsequently, the matter was taken up for hearing, wherein the Respondent appeared before this Authority and reiterated the submissions made in the written reply and sought consideration of the same.

8. During the course of proceedings, this Authority also examined additional material placed on record, including permissions and communications obtained from planning authorities, which revealed that the Respondent had applied for regularisation and approval in respect of a substantially large extent of land admeasuring Ac. 86-39.99 guntas involving multiple plots. The Respondent, however, maintained that the development consists of independent units and denied any violation of the provisions of the RE(R&D) Act, 2016.

OBSERVATIONS OF THIS AUTHORITY:

9. The Authority has considered the Show Cause Notice, the replies filed by the Respondent, the material available on record, including the website content, brochure, pricing details, permissions obtained from planning authorities, and such other documents placed before it. Upon careful consideration of the same, the Authority proceeds to record the following observations.

10. A scrutiny of the promotional material published and exhibited by the Respondent, including content available on its website and other public platforms, clearly demonstrates that the project has been systematically presented and marketed under the name “Anvaya Villas.” The manner in which the project is portrayed, including depiction of layout, categorisation of villas, pricing structure, and location-based advantages, is not incidental but reflects a deliberate and sustained strategy to promote and offer the project for sale to the public. Such representation unmistakably establishes that the Respondent is engaged in the development and marketing of a real estate project within the meaning of the RE(R&D) Act, 2016.

11. This Authority further notes that upon verification of the records available with this Authority and the RERA registration number mentioned on the broacher, the project is registered under the name “Anvaya Icon City” bearing Registration No. P02400008311, valid from 03.06.2024 to 29.12.2026, for a total of 57 villas. However, upon subsequent verification of the Respondent’s own website and brochure, it is observed that the Respondent is consistently referring to and promoting the project under a different name, namely “Anvaya Villas.” Such deviation from the registered project name is not a mere nomenclature difference but results in misrepresentation of the identity of the registered project, thereby misleading prospective purchasers.

12. Further, a perusal of the brochure obtained from the Respondent’s website reveals that while the registration pertains only to 57 villas, the project is being advertised and marketed as comprising more than 300 villas spread across approximately 30 acres of land. This glaring discrepancy between the registered particulars and the promotional representation cannot be treated as inadvertent and clearly indicates that the Respondent is projecting a substantially larger project than what is registered with this Authority.

13. The Authority is constrained to observe that the Respondent, while holding a limited registration for 57 villas under the project “Anvaya Icon City,” has projected and marketed a much larger development of 300+ villas under the name “Anvaya Villas.” Such conduct amounts to advertisement and offering for sale of units which are not covered under the registered project, thereby constituting promotion of an unregistered real estate project / unregistered portion of a project in clear violation of Section 3 of the RE(R&D) Act, 2016.

14. The Respondent’s conduct in using a different project name in its brochures, website and promotional material, while simultaneously relying upon an existing registration under another name, is a clear act of misrepresentation and deception. The statutory mandate under the RE(R&D) Act, 2016 requires complete transparency, including correct disclosure of project

name, registration number and particulars. Any deviation therefrom has the effect of misleading the public regarding the authenticity and legal status of the project.

15. The Authority further observes that the representation of a 30-acre development comprising 300+ villas is not in conformity with the registration granted by this Authority or with the approvals of the planning authority. The Respondent has failed to place on record any material to establish that such expanded development forms part of the registered project. This indicates that the Respondent is marketing and offering for sale units in a development that is not duly registered under the RE(R&D) Act, 2016.

16. The Respondent's plea that the development consists of independent villas constructed under separate permissions is wholly contradicted by its own promotional material. The existence of a unified layout, large-scale development, and structured pricing clearly establishes that the project is an integrated real estate project and not a collection of independent units. Such contention appears to be a device adopted to circumvent the mandatory requirement of registration under Section 3 of the RE(R&D) Act, 2016.

17. Furthermore, the claim of exemption under Section 3(2) of the RE(R&D) Act, 2016 is wholly untenable. The scale of development as projected by the Respondent itself, i.e., 300+ villas over 30 acres, far exceeds the statutory thresholds prescribed under the said provision. The Respondent has also failed to produce any documentary evidence to substantiate such claim of exemption.

18. The Authority is of the considered view that the Respondent has indulged in a deliberate attempt to circumvent the provisions of the RE(R&D) Act, 2016 by (i) misrepresenting the project name, (ii) projecting a substantially larger unregistered development under the cover of a limited registration, and (iii) marketing and offering for sale units beyond the scope of the registered project. Such conduct amounts to unfair trade practice and undermines the very object of the regulatory framework.

19. In light of the foregoing, the Authority holds that the Respondent has engaged in misrepresentation of project identity, advertisement and marketing of unregistered units, and promotion of a project beyond the scope of its registration, thereby committing violations of Section 3 of the RE(R&D) Act, 2016, attracting penal consequences under Section 59 of the said Act.

Directions of the Authority:

20. 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) This Authority, upon a comprehensive appraisal of the record, is satisfied that the Respondent has committed grave and deliberate violations of Section 3 of the RE(R&D) Act, 2016, in respect of the project, Anvaya Icon City. The Respondent, while holding registration for a limited development comprising 57 villas under the project registered as “Anvaya Icon City” bearing Registration No. P02400008311, valid from 03.06.2024 to 29.12.2026, has engaged in advertisement, marketing and offering for sale of a substantially larger development comprising more than 300 villas spread across approximately 30 acres, which is not registered with this Authority. The Respondent has further misrepresented the identity of the registered project by branding and promoting it under a different name, namely “Anvaya Villas,” in its brochures, website, and other promotional material. 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, 2016.

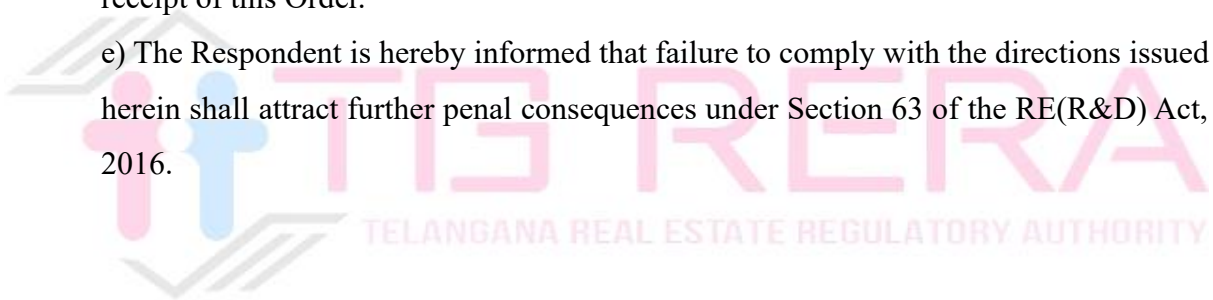
b) The Respondent, in respect of the development projected and marketed as “Anvaya Villas,” is held to have promoted and offered for sale an unregistered portion of a real estate project beyond the scope of the registered project “Anvaya Icon City.” The material on record clearly establishes that the Respondent has advertised, marketed, invited bookings and offered for sale villas far in excess of the registered 57 villas. 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, 2016. Accordingly, if the Respondent intends to engage in any advertisement, marketing, booking, allotment, sale or invitation to purchase any villas beyond the registered 57 villas, it shall take steps for registration of the project under the RE(R&D) Act, 2016. Until such registration is duly granted, there shall remain an absolute embargo on any form of advertisement, marketing, solicitation, booking or sale relating to the unregistered portion of the project.

c) The Respondent is further directed to immediately refrain from branding, renaming, projecting, advertising or marketing the registered project under the name “Anvaya

Villas” or under any name other than the name in which such project stands registered with this Authority. The Respondent shall, within seven (7) days from receipt of this Order, restore the registered project name “Anvaya Icon City” 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) of the RE(R&D) Act, 2016.

d) For the violations of Section 3 committed by the Respondent in respect of advertisement and marketing of unregistered villas beyond the registered scope, and for misrepresentation of the project identity, the Respondent is held liable for penalty under Section 59 of the RE(R&D) Act, 2016. 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 penalty of 2,14,51,440/- (Rupees Two Crore Fourteen Lakh Fifty-One Thousand Four Hundred Forty Only) upon the Respondent, payable within thirty (30) days from the date of receipt of this Order.

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