

BEFORE TELANGANA REAL ESTATE REGULATORY AUTHORITY

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

SUO MOTU CASE NO. D6/886/2025

Date: 24th June 2026

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

M/s SLN Infra Projects,
Represented by Sri Gowri Sridhar Goud
Plot No.41, Huda Enclave, Road No. 70,
Journalist Colony, Near Andhrajiyothi Office,
Shaikpet, Hyderabad

....Promoter/Respondent

SLN Sundaram Palm Villas

... Project Name

The matter came up for hearing before the Authority on various dates, wherein the Respondent appeared through counsel. Upon hearing the submissions of the counsel for the Respondent and upon consideration of the material available on record in this, this Authority proceeds to pass the following **ORDER:**

2. 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"), basing on the information brought to the notice of this Authority through representation dated 11.04.2025 submitted by the Petitioner Gudapati Venkateswara Rao.

3. The information disclosed that the Respondent, M/s SLN Infra Projects (hereinafter referred to as "the Respondent") is developing a real estate project titled "SLN Sundaram Palm Villas" situated at Nagarjuna Sagar Road, Bongloor, Hyderabad, and has engaged in advertising, marketing, selling and inviting persons to purchase villas, pursuant to such information, on verification of information on the website of this Authority coupled with verification of promotional materials, including brochures, online advertisements, and information available on digital platforms relating to the said project it has become clear that the said Promoter/ Developer M/s SLN Infra Projects did not registering the said project with TG-RERA under Section 3 of the RE(R&D) Act, 2016. The Petitioner further brought to the notice of this Authority that the Respondent is involved in similar activities in other projects and has failed to honour commitments made to purchasers.

4. As such, this Authority issued Show Cause Notices dated 19.04.2025 and 06.06.2025 to the Respondent 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 24.07.2025 stating that the project comprises only nine (9) villas, each sanctioned separately under TS-BPASS permissions issued by Adibatla Municipality. The Respondent submitted that it had addressed a letter dated 25.05.2023 to the Authority seeking clarification regarding the applicability of the RE(R&D) Act, 2016 to the said project, and that no response was received. It was further submitted that the project was intended exclusively for family use and not for sale to the public, and therefore the provisions of Sections 3(1) and 4(1) of the RE(R&D) Act, 2016 are not attracted.

6. Upon perusal of the Respondent's reply, this Authority scheduled a personal hearing on 12.09.2025, wherein the Respondent appeared through counsel and filed vakalatnama. The learned counsel for the Respondent sought time for filing a detailed counter, which was granted by this Authority.

7. Thereafter, the matter was listed on 17.10.2025. On that day, the Respondent remained absent, and there was no representation on its behalf. Subsequently, while so to give one more chance, the matter was adjourned to 26.11.2025 for hearing the learned counsel of the Respondent. On that day, he appeared and sought additional time for filing the counter, which was granted. On 05.02.2026, the Respondent's counsel again sought further time for filing the counter. Accordingly, time was extended again. On 25.02.2026, yet another request was made seeking further time for filing the counter. Considering the repeated requests, this Authority granted a final opportunity to the Respondent to file its counter.

8. Thereafter, on 27.02.2026, the Respondent filed counter, where in it was submitted that the project is non-commercial in nature, intended for family occupation, and that no advertisement, marketing, or sale to the public was undertaken. The Respondent further sought time for advancing oral arguments. Accordingly, the case was posted on 13.03.2026. On 13.03.2026, the learned counsel for the Respondent sought further time for advancing oral arguments, which was granted.

9. On 07.04.2026, when the matter was taken up, a junior counsel appeared on behalf of the Respondent. Despite sufficient opportunities having been granted, no oral arguments were advanced. Accordingly, the opportunity for oral arguments was treated as forfeited, and the matter was reserved for orders.

10. In the meanwhile the Petitioner has submitted additional information dated 18.02.2026, by placing on record brochures, online advertisements, and digital communications indicating that the project consists of 40 villas and that it was being actively marketed to the public through various platforms.

Observations of the Authority:

11. The Respondent has contended that the project comprises only nine (9) villas constructed for family use and is therefore not liable for registration under the RE(R&D) Act, 2016. However, this contention is found to be factually incorrect in the absence of any supporting material on record on its behalf. While so on the other hand, the brochure and promotional content placed before this Authority by the petitioner indicate that the project comprises a substantially higher number of units that is to say, forty (40) villas, along with common amenities and infrastructure. Further the manner in which the project has been advertised, including depiction of layout, amenities, and location advantages, clearly establishes that the project is being marketed as a commercial residential venture. Even otherwise, assuming the Respondent's own version of nine units, the project exceeds the statutory threshold prescribed under Section 3(2) of the RE(R&D) Act, 2016, thereby attracting the mandatory requirement of registration.

12. This Authority further notes that the Respondent has taken a plea that it had addressed a letter dated 25.05.2023 seeking clarification regarding the applicability of the RE(R&D) Act, 2016, and that in the absence of a response, it had proceeded on the understanding that registration was not required. This contention is wholly untenable and legally unsustainable. The RE(R&D) Act, 2016, is a self-contained statutory framework, and the obligations imposed therein are mandatory in nature. The requirement of registration under Section 3(1) is absolute and cannot be made contingent upon any clarification or response from the Authority. The statutory provisions, rules, and regulatory guidelines are available in the public domain, and as such any promoter engaged in real estate activity is presumed to have full knowledge of the same. The Respondent cannot seek to evade compliance by taking shelter under a self-serving plea of having addressed a letter and not receiving a response. The maxim *ignorantia juris non excusat* squarely applies, and such a defence is liable to be rejected in limine.

13. This Authority further observes that the conduct of the Respondent in the present proceedings reflects a pattern of delay and lack of diligence. The Respondent was granted multiple opportunities on various dates, including 12.09.2025, 26.11.2025, 05.02.2026, and 25.02.2026, to file its counter and advance submissions. Despite such repeated accommodation, the Respondent, except filing of a counter on 27.02.2026 and advancing

partial arguments, was found to be casual and evasive towards statutory proceedings, which cannot be countenanced by this Authority.

14. Further, the Authority also notes that the Respondent has adopted contradictory and inconsistent positions. On one hand it has claimed that the project is meant for private family use, and on the other hand engaged in public advertisement and marketing activities. The existence of brochures, online promotions, and solicitation of purchasers clearly establishes that the project is being offered for sale to prospective purchasers. Such conduct not only negates the Respondent's defence but also indicates an attempt to mislead and circumvent the statutory framework.

15. Section 3 of the RE(R&D) Act, 2016, constitutes the foundational provision governing real estate activity, mandating that no promoter shall advertise, market, sell, or offer for sale any real estate project without obtaining registration. The said provision is couched in mandatory terms and admits of no exception except those specifically carved out under Section 3(2) of the RE(R&D) Act, 2016. In the present case, the Respondent has admittedly undertaken advertisement and marketing activities without obtaining registration, thereby acting in direct contravention of Section 3(1) of the RE(R&D) Act, 2016. Such violation strikes at the very root of the regulatory framework intended to ensure transparency and protect the interests of allottees.

16. In view of the foregoing observations, this Authority finds that the Respondent has violated the provisions of Section 3(1) of the RE(R&D) Act, 2016, by advertising, marketing, and offering for sale of units/ villas in the project "SLN Sundaram Palm Villas" without obtaining registration with this Authority. The conduct of the Respondent reflects deliberate non-compliance and disregard for statutory obligations, and is therefore liable for penal action under Section 59 of the RE(R&D) Act, 2016.

Directions of the Authority:

17. 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, this Authority hereby issues the following directions against the Respondent:

- a) For violation of Section 3 of the RE(R&D) Act, 2016, i.e., for non-registration of the project "SLN Sundaram Palm Villas", the Respondent is liable for penalty under Section 59 of the RE(R&D) Act, 2016. Accordingly, the Respondent is directed to pay a penalty of ₹10,77,520/- (Rupees Ten Lakh Seventy-Seven Thousand Five Hundred Twenty Only) payable within 30 days in favour of 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 shall initiate steps to register the concerned project within 10 days from the date of this Order, duly obtaining approval and sanction from the planning authority and the development control authority concerned.
17. 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
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