

**BEFORE TELANGANA REAL ESTATE REGULATORY AUTHORITY**

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

**Complaint No.19/2025/TG RERA (Penalty Order)**

**Dated: 21<sup>st</sup> January, 2026**

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

**Allamneni Moni Chandra**

(Plot No. 226, Road No. 78, Astha Green Building,  
Opp: HDFC Film Nagar Branch, Jubilee Hills, Hyderabad 500096)

**... Complainant**

Versus

**1. M/s. Surabhi Estates Pvt. Ltd.**

(Unit 20-21, First Floor, Minerva Complex,  
Sarojini Devi Road, Kalasiguda, Secunderabad – 500003)

**2. Sri. S.E. Srinivas**

(Occ: Managing Director  
R/o. Sy. No. 292, H. No. 4-222/1, Ram Reddy Nagar  
IDA Jeedimetla, Phase V, Hyderabad – 500055)

**... Respondents**

The above-numbered Complaint No.19/2025 was instituted by the Complainant before the Telangana Real Estate Regulatory Authority (hereinafter referred to as “the Authority”) against the Respondent in respect of the project titled “Surabhi’s Signature Villas Phase II” situated in Survey Nos. 19/AA1, 19/AA2, 19/E1 and 19/E2, Osman Nagar Village, Ramachandrapuram Mandal, Medak District, Upon due adjudication of the said complaint, this Authority, having carefully examined the pleadings, documents, and material placed on record, has already recorded detailed findings vide order dated 21.11.2025, and held that the Respondents have indulged in a pre-launch offer in respect of Phase-II and entered into an MoU even before registering the said phase with TG RERA, which constitutes breach of Sections 3 and 4 of the Real Estate (Regulation and Development) Act, 2016 (hereinafter referred to as “the RE(R&D) Act, 2016”).

2. The Authority vide orders dated: 21.11.2025 in CC No.19/2025. made the following observations:

*“To examine the Respondents’ objection, this Authority refers to Section 3(1) of the Act. Any project exceeding eight units or 500 sq. m. for which no Completion Certificate or Occupancy Certificate has been issued as on the date of commencement of the RE(R&D) Act, automatically qualifies as an “ongoing project.” Further, Rule 2(1)(j) of the Telangana RERA Rules, 2017, as amended, defines an “ongoing project” as a project where development is in progress and for which the Occupancy Certificate or Completion Certificate has not been issued as on the date of commencement of Section 3 of the RE(R&D) Act. The amended Rule 2(1)(j) was intended to harmonise the definition with Section 3 itself. In the present case, the Respondents have not placed on record any Occupancy Certificate for Phase-I of the project. A mere assertion that the project obtained an approval before 01.01.2017 does not confer exemption when the project remains incomplete for want of statutory post-construction certifications. Therefore, the Respondents’ contention that the project does not fall within the jurisdiction of this Authority is untenable. The project is squarely an ongoing project and ought to have been registered under Section 3 of the RE(R&D) Act.*

*In light of the above findings, this Authority unequivocally holds that the project qualifies as an ongoing project under the RE(R&D) Act. The preliminary objection raised by the Respondents is without merit and is accordingly rejected. As Phase-I remains unregistered, Respondents No.1 and 2 are directed to forthwith initiate registration of Phase-I and ensure strict compliance with all provisions of RE(R&D) Act.*

*However, considering the ambiguity that prevailed at the relevant time due to the earlier interpretation of Rule 2(1)(j), this Authority is inclined to adopt a lenient view with respect to penal action. Accordingly, while the Authority holds that the project ought to have been registered, it refrains, at this stage, from invoking Sections 59 and 60 of the RE(R&D) Act.*

*Nevertheless, the Respondents are strictly restrained from undertaking any further advertising, marketing, booking, selling, offering for sale, or inviting persons to purchase any villa or plot in the said project until registration is duly obtained. Any future violation will attract appropriate action under Sections 59, 60, and 63 of the Act.*

*Additionally, this Authority takes serious note of the fact that the Respondents have indulged in a pre-launch offer in respect of Phase-II. Entering into an MOU for Phase-II even before registering the said phase clearly indicates that the Respondents were inviting persons to purchase units and offering to sell units prior to registration, in violation of Section 3 of the RE(R&D) Act. Accordingly, such conduct constitutes a violation attracting Section 59 of the RE(R&D) Act, pertaining to contraventions arising from pre-launch activities.”*

**Directions of the Authority:**

3. 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 violation of the provisions of Sections 3 and 4 of the RE(R&D) Act, 2016, on account of non-registration of the project “Surabhi’s Signature Villas Phase II,” situated at Osman Nagar Village of Ramachandrapuram Mandal of Medak District, the Respondents is held liable for imposition of penalty under Sections 59 and 60 of the RE(R&D) Act, 2016, respectively. Accordingly, the Respondent are directed to pay a penalty of Rs.10,11,260 /- (Rupees Ten lakhs Eleven Thousand Two hundred and Sixty Rupees only) within a period of thirty (30) days from the date of receipt of this Order, in favour of the TGRERA Fund, either by way of Demand Draft or through online transfer to Account No. 50100595798191, HDFC Bank, IFSC Code: HDFC0007036.
- b) The Respondents shall not advertise, market, book, sell or offer for sale, or invite persons to purchase in any manner any plot, apartment, villa or building, as the case may be, in the project “Surabhi’s Signature Villas Phase II” or any part thereof, without first registering the said project with this Authority in accordance with the provisions of the RE(R&D) Act, 2016.

- c) The Respondent are directed to initiate steps for registration of the project “Surabhi’s Signature Villas Phase II” within ten (10) days from the date of this Order, after duly obtaining all requisite approvals, permissions and sanctions from the competent planning and development control authorities, and to place the same on record before this Authority.
- d) The Respondent are 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, without any further notice.

**Sd/-**  
**Sri. K. Srinivas Rao,**  
**Hon’ble Member**  
**TG RERA**

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

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

