BEFORE THE MAHARASHTRA REAL ESTATE REGULATORY AUTHORITY, MUMBAI

SUO MOTU ADVERTISEMENT COMPLAINT NO. SM12600271

MahaRERA on its Own Motion …. Complainant

Versus

RAGHAV RAJ BUILDERS & DEVELOPERS LLP …. Respondent/Promoter

MahaRERA Project Registration No.: P51800054281

Project Name: RAGHAV ANANTA.

MahaRERA Project Registration No. P51800054281

Coram: Sudhakar Deshmukh, Director Complaint Management, MahaRERA

(As per power Delegation Order of the Authority dated 12.08.2025)

Adv. Virali Pumaniya appeared for the Promoter/ Respondent.

ORDER

11th June, 2026

(Through Hybrid Mode as per MahaRERA Circular No.: 49/2025)

1. FACTS OF THE CASE:

a) The Maharashtra Real Estate Regulatory Authority (MahaRERA) filed this Suo Motu Complaint on April 21, 2026, against the Promoter, RAGHAV RAJ BUILDERS & DEVELOPERS LLP, for an alleged violation of mandatory advertisement disclosure norms.

b) The violation arose from an advertisement made on a poster pertaining to real estate project "RAGHAV ANANTA" registered with MahaRERA under registration number P51800054281.

c) It was observed that the advertisement contained two primary violations:

I. It did not mention the Quick Response (QR) code of the registered project in the required size as per guidelines given in Order no. 46C/2025.

II. The advertisement does not mention registered project no. P51800054281 in the poster as per guidelines given in Order no. 46C/2025.

d) In the hearing dated June 04, 2026, the representative for the Promoter/Respondent appeared and the matter was reserved for order.

2. SUBMISSIONS OF RESPONDENT

a) The Respondent submits that the MahaRERA Registration Number (P51800054281) was duly mentioned in the impugned advertisement.

b) In support of its contention, the Respondent has placed on record a copy of the advertisement highlighting the MahaRERA Registration Number.

c) The Respondent has requested that the said fact be taken on record and that the present proceedings be dropped.

d) The Respondent has further assured its continued cooperation and compliance with the applicable provisions and directions issued by MahaRERA.

3. LEGAL FRAMEWORK AND PROVISIONS

a) The Authority, exercising powers under Section 11(2) of the Real Estate (Regulation and Development) Act, 2016, (the Act) mandates that any advertisement or prospectus issued or published by a promoter shall prominently display the website address of the Authority and include the registration number obtained from the Authority, along with such other matters as may be incidental thereto.

b) The Authority's direction for mandatory QR code disclosure stems from:

i. MahaRERA Order No. 46/2023 (dated 29.05.2023): Mandated the prominent display of a legible, readable, and detectable QR Code next to the MahaRERA Registration Number and Website Address in all advertisements published after August 1, 2023.

ii. MahaRERA Order No. 46A/2023 (dated 25.07.2023): Reiterated the effective date of August 1, 2023, and specified that failure to comply shall be construed as a violation, subject to penalty under Section 63 of the Act.

iii. MahaRERA Order No. 46C/2025 (dated 08.04.2025): Reiterated the effective date of August 1, 2023, and specified the directions issued by the Authority in MahaRERA Order Nos. 46/2023, 46A/2023 and 46B/2023 dated 29.05.2023, 25.07.2023 and 21.08.2023 respectively and specified that failure to comply shall be construed as a violation, subject to penalty under Section 63 and/or 65 of the Act.

4. FINDINGS AND CONCLUSION :-

a) It is observed that the impugned advertisement pertaining to the project "RAGHAV ANANTA" (MahaRERA Reg. No. P51800054281) did not comply with the disclosure requirements prescribed under MahaRERA Order Nos. 46/2023, 46A/2023 and 46C/2025.

b) Although the Respondent has contended that the MahaRERA Registration Number was mentioned in the advertisement, the Authority observes that the MahaRERA Registration Number was not clearly visible due to their small font size and the use of a light colour, thereby defeating the objective of prominent disclosure mandated under the Act and the Orders issued thereunder.

c) The Authority further notes that the advertisement did not display the QR Code in the prescribed size and manner as required under the applicable MahaRERA Orders.

d) Merely mentioning the registration number in an advertisement does not amount to compliance when the disclosure is not legible, prominent and readily visible to prospective purchasers. The mandatory disclosure requirements are intended to ensure transparency and facilitate easy verification of project details by the public.

e) The Respondent's request for dropping the proceedings cannot be accepted as the material on record establishes non-compliance with the mandatory disclosure norms prescribed by the Authority.

f) Accordingly, the Authority holds that the Respondent has violated Section 11(2) of the Real Estate (Regulation and Development) Act, 2016 read with MahaRERA Order Nos. 46/2023, 46A/2023 and 46C/2025 and is liable for penalty under Section 63 of the Act.

5. In view of the established violations of the Authority's Orders and the principles of transparency under the Act, the following directions are issued:

a) Penalty of Rs. 25,000/- (Rupees Twenty-five Thousand Only) is hereby imposed upon the Promoter for the violations referred to hereinabove.

b) The said penalty shall be payable by the Promoter within a period of fifteen (15) days from the date of enforcement of this Order.

c) In the event of failure to pay the penalty within the stipulated period, the penalty amount shall stand doubled.

d) If the Promoter fails to pay the applicable penalty amount even after three (3) months from the date of this Order, the Authority shall be at liberty to initiate further legal action in accordance with the provisions of the Real Estate (Regulation and Development) Act, 2016 and the rules and regulations framed thereunder, without any further notice.

e) The Technical and Finance Departments of the MahaRERA Authority are mandated to authenticate the payment of the penalty prior to initiating the processing of any applications, including but not limited to extensions, corrections, and change of name, pertaining to the concerned project.

f) In view of the above, the present complaint stands disposed of.

SUDHAKAR VISHNU DESHMUKH

Digitally signed by SUDHAKAR VISHNU DESHMUKH
Date: 2026.06.11 16:59:08 +05'30'

(Sudhakar Deshmukh)

Director (Complaint Management) MahaRERA