IN THE HIGH COURT FOR THE STATE OF TELANGANA
AT HYDERABAD

THE HONOURABLE SRI JUSTICE N.TUKARAMJI

CRIMINAL PETITION Nos.10502, 10531, 10536 and 10543 OF 2026

DATE: 29.07.2026

Between :

CRIMINAL PETITION No.10502 of 2026:

Sri Ghanta Punna Rao

… Petitioner/Accused No.1.

AND

The State of Telangana, Represented by its Public Prosecutor, Through SHO-Patancheru, High Court of Telangana at Hyderabad.

… Respondent/Complainant.

CRIMINAL PETITION NO.10531 OF 2026:

Sri Ghanta Punna Rao

… Petitioner/Accused No.1.

AND

The State of Telangana, Represented by its Public Prosecutor, Through SHO-Patancheru, High Court of Telangana at Hyderabad.

… Respondent/Complainant.

CRIMINAL PETITION NO.10536 OF 2026:

Sri Ghanta Punna Rao

… Petitioner/Accused No.1.

AND

The State of Telangana, Represented by its Public Prosecutor, Through SHO-Patancheru, High Court of Telangana at Hyderabad.

… Respondent/Complainant.

CRIMINAL PETITION NO.10543 OF 2026:

Sri Ghanta Punna Rao

… Petitioner/Accused No.1.

AND

The State of Telangana, Represented by its Public Prosecutor, Through SHO-Patancheru, High Court of Telangana at Hyderabad.

… Respondent/Complainant.

COMMON ORDER:

These Criminal Petitionsare filed under Section 482 of *Bharatiya Nagarik Suraksha Sanhita, 2023* (for short, "BNSS"), seeking the relief of pre-arrest bail.

2. This petitioner is arrayed as Accused No.1 in Crime Nos.470, 475, 476 and 471 of 2026 respectively on the file of Patancheru Police Station, Sanga Reddy District registered for the offences punishable under Sections 420, 465, 471 r/w 120-B of *Indian Penal Code,1860* (for short, 'IPC').

3. Heard M/s. Unnam Sravan Kumar, learned Counsel for the petitioner and Mr. Syed Yasar Mamoon, learned Additional Public Prosecutor, representing the respondent-State.

FACTS OF THE CASE:

4.1. These petitions arise out of Crime Nos. 471, 475, and 476 of 2026, which were registered in relation to transactions concerning *Sri Sainath Gardens Layout*, developed by GPR Housing Private Limited under the management of petitioner/Accused No.1. Although each FIR is based on a complaint lodged by a different purchaser in respect of different plots, all of them emanate from the same series of transactions, particularly the execution of Sale Deed No.60 of 2026 in favour of *M/s. LSML Private Limited*. The common allegations include suppression of title deeds and prior transactions, manipulation of revenue records, fraudulent transfer of property, and infringement of the rights of bona fide purchasers.

4.2. In Crime No.470 of 2026, the complainant, who purchased Plot Nos.237, 238, 253, and 254 under a registered sale deed dated 11.10.2004, alleges that although the layout comprised approximately 3,100 plots spread over 70 survey numbers, the sale deeds intentionally referred to only 12 survey numbers, while suppressing the remaining survey numbers and the link title document bearing No.3264 of 1998. It is further alleged that the accused manipulated the land records and title documents, resulting in title disputes, mutation issues, and financial loss to the purchasers. Accordingly, the crime was registered for the offences punishable under Sections 420, 465, and 471 read with Section 120-B of the Indian Penal Code.

4.3. Crime No.471 of 2026 pertains to Plot Nos.2, 3, and 20. The complainant alleges that, after selling the residential plots, the accused falsely represented the land as agricultural land and created a mortgage in favour of Punjab National Bank, which ultimately resulted in proceedings under the SARFAESI Act and the execution of Sale Deed No.60 of 2026 in favour of *M/s. LSML Private Limited*. It is further alleged that the accused trespassed into the layout and demolished compound walls and other structures despite the subsistence of injunction orders. On these allegations, the complainant seeks prosecution for cheating, forgery, creation of an illegal mortgage, fraudulent sale, criminal breach of trust, and criminal conspiracy.

4.4. Crime No.475 of 2026 relates to Plot No.1 and contains substantially similar allegations, namely suppression of prior sale transactions and layout approvals, creation of an illegal mortgage, execution of Sale Deed No.60 of 2026, manipulation of revenue records, and subsequent trespass and demolition. Accordingly, the crime was registered for the offences punishable under Sections

318(4), 324(5), 336, 338, 340, and 61(2) of the Bharatiya Nyaya Sanhita, 2023.

4.5. Crime No.476 of 2026 pertains to Plot No.103. The principal allegation is that, despite the subsistence of the Debts Recovery Tribunal (DRT) attachment order dated 22.08.2025, the accused executed Sale Deed No.60 of 2026, manipulated the revenue records, procured illegal mutations and Pattadar Passbooks, and created third-party rights over the attached property in conspiracy with the Directors of *M/s. LSML Private Limited* and certain revenue officials. The complainant has also sought cancellation of Sale Deed No.60 of 2026 and the consequential revenue entries. The crime was registered for the offences punishable under Sections 318(4), 324(5), 336, 338, 340, 61(2), and 198 of the BNS.

4.6. Thus, although the complainants, the plots involved, and certain factual particulars differ, all four crimes substantially arise out of the same series of transactions relating to *Sri Sainath Gardens Layout* and the execution of Sale Deed No.60 of 2026.

4.7. Crime No.470 of 2026 primarily concerns the alleged suppression of survey particulars and link title documents in connection with the original sale transactions.

4.8. Crime Nos.471 and 475 of 2026 principally relate to the alleged illegal mortgage, the consequential SARFAESI proceedings, the execution of Sale Deed No.60 of 2026, and the subsequent acts of trespass and demolition.

4.9. In contrast, Crime No.476 of 2026 specifically focuses on the alleged suppression of the DRT attachment order, manipulation of revenue records, procurement of illegal mutations and Pattadar Passbooks, and the creation of third-party rights over the attached property.

SUBMISSIONS OF THE PETITIONER:

5.1. Learned Senior Counsel for the petitioner submits that all four crimes arise out of transactions relating to *Sri Sainath Gardens Layout* and essentially concern competing claims of title, ownership, and conveyance of immovable property. It is contended that the disputes emanate from registered sale deeds, mortgage transactions, revenue records, proceedings before the Debts Recovery Tribunal (DRT), and measures initiated under the SARFAESI Act, all of which are predominantly civil in nature. According to the petitioner, the criminal proceedings have been initiated solely to exert pressure in pending civil disputes. It is further submitted that none of the FIRs attributes any specific overt act or individual role to the petitioner, except describing him as the Managing Director of *GPR Housing Private Limited*. The allegations are omnibus in nature and fail to disclose the essential ingredients of the offences alleged. Since the prosecution case is founded entirely on registered documents, revenue records, DRT orders, and other public documents already in the possession of the Investigating Agency, no recovery is required from the petitioner, and custodial interrogation is wholly unwarranted.

5.2. With regard to Crime No.470 of 2026, it is submitted that the FIR was lodged nearly 21 years after the execution of the registered sale deed in the year 2004, without any explanation for the inordinate delay. The allegations regarding suppression of survey numbers and title documents pertain to matters requiring adjudication by a competent civil court. Learned Senior Counsel further submits that the petitioner is 74 years of age, is suffering from hypertension and diabetes, and undertakes to cooperate with the investigation and abide by any conditions that may be imposed by this Court.

5.3. In respect of Crime No.471 of 2026, it is contended that the allegations arise out of mortgage transactions, proceedings before the DRT, and measures taken under the SARFAESI Act, all of which are governed by a special statutory framework and involve predominantly civil rights and liabilities. It is further submitted that no specific allegation or overt act has been attributed to the petitioner and that the prosecution case is based solely on documentary evidence already available with the Investigating Agency.

5.4. As regards Crime No.475 of 2026, learned counsel submits that it is yet another attempt to criminalize a civil dispute arising out of competing claims of title. The FIR does not disclose the essential ingredients of the offences alleged, attributes no specific overt act to the petitioner, is founded entirely on documentary evidence, and relates to the very same property transactions that form the subject matter of the earlier crimes.

5.5. With respect to Crime No.476 of 2026, it is submitted that the allegations concerning the DRT attachment order, revenue mutations, and Pattadar Passbooks also pertain to civil disputes regarding title and revenue entries. It is contended that the allegations are based exclusively on official records already available with the Investigating Agency, that no overt act has been attributed to the petitioner, and that custodial interrogation is, therefore, unnecessary.

5.6. In support of the above submissions, learned counsel for the petitioner has placed reliance upon the decisions of *Mohammed Ibrahim v. State of Bihar*, (2009) 8 SCC 751; *Arnesh Kumar v. State of Bihar*, (2014) 8 SCC 273; and *Siddharam Satlingappa Mhetre v. State of Maharashtra*, (2011) 1 SCC 694.

5.7. Learned counsel for the petitioner finally submits that all four FIRs arise out of the same series of property transactions, are founded predominantly on documentary evidence, involve disputes that are essentially civil in nature, and do not disclose any specific criminal act attributable to the petitioner. It is further submitted that the petitioner has undertaken to cooperate with the investigation and comply with any conditions that may be imposed by this Court. Accordingly, it is urged that the petitioner be granted anticipatory bail.

SUBMISSIONS OF THE RESPONDENT:

6.1. Learned Additional Public Prosecutor opposed the grant of anticipatory bail, contending that the petitioner, as the Managing Director of GPR Housing Private Limited, played a key role in the alleged fraudulent transactions relating to *Sri Sainath Gardens Layout*. It is submitted that the investigation has disclosed prima facie material indicating the petitioner's involvement in a larger criminal conspiracy involving the suppression of material title documents, manipulation of revenue records, execution of subsequent sale transactions, and infringement of the rights of bona fide purchasers. According to the prosecution, all four crimes arise out of the same real estate venture and disclose a continuing course of fraudulent conduct affecting several purchasers. It is further submitted that the Investigating Officer has collected substantial documentary evidence, including registered sale deeds, mortgage documents, revenue and municipal records, proceedings before the DRT, mutation records, and other public documents, besides recording the statements of material witnesses. It is also submitted that the investigation has revealed the absence of final layout approval and *NALA* conversion. The prosecution, therefore, contends that custodial interrogation of the petitioner is necessary to unearth the conspiracy, ascertain the role of each accused, identify the other participants, and collect further evidence.

6.2. In respect of Crime No.470 of 2026, it is submitted that the investigation has disclosed suppression of survey particulars, title documents, and statutory approvals while selling the plots. Reliance is placed upon the statement of the former Sarpanch, who allegedly confirmed that the developers had not produced complete documents for obtaining the requisite statutory approvals. It is, therefore, contended that custodial interrogation is necessary to investigate the conspiracy underlying the sale of the plots.

6.3. In Crime No.471 of 2026, the prosecution submits that the investigation has revealed the petitioner's involvement in mortgaging the property after selling the plots to purchasers and thereafter executing Sale Deed No.60 of 2026 in favour of *M/s. LSML Private Limited* despite the pendency of proceedings before the Debts Recovery Tribunal. According to the respondent, the material collected during the investigation indicates suppression of the rights of the existing purchasers, thereby warranting a thorough investigation into the petitioner's role in the mortgage transaction and the subsequent conveyance.

6.4. In respect of Crime No.475 of 2026, it is submitted that the investigation indicates suppression of prior plot sales and the execution of subsequent transactions in favour of *M/s. LSML Private Limited* despite the subsisting rights of the earlier purchasers. The prosecution contends that the documentary evidence collected and the statements of witnesses prima facie establish the petitioner's involvement in a conspiracy to re-sell plots that had already been conveyed, thereby necessitating custodial interrogation for the purpose of an effective investigation.

6.5. In Crime No.476 of 2026, the respondent submits that the investigation concerns the alleged suppression of the DRT attachment order, execution of Sale Deed No.60 of 2026, manipulation of revenue records, procurement of illegal mutations, and creation of third-party rights over the attached property. It is contended that the material collected during the course of investigation prima facie establishes the petitioner's involvement in the alleged conspiracy.

6.6. Learned Additional Public Prosecutor further submits that the petitioner is an accused in all four crimes, all of which arise out of the same real estate venture and disclose a consistent pattern of fraudulent conduct. It is contended that the investigation is at a crucial stage and that the grant of anticipatory bail is likely to prejudice the ongoing investigation. Accordingly, it is prayed that the petitions seeking anticipatory bail be dismissed.

ANALYSIS AND CONCLUSION:

7. I have carefully considered the rival submissions and perused the material available on record.

8. The material on record discloses that all four FIRs arise out of transactions relating to the development of *Sri Sainath Gardens Layout* by GPR Housing Private Limited. Although the FIRs have been lodged by different purchasers in respect of different plots, they substantially emanate from the same real estate venture and revolve around common allegations of suppression of title documents and prior transactions, manipulation of revenue records, execution of Sale Deed No.60 of 2026 in favour of *M/s. LSML Private Limited*, and the consequent prejudice caused to the rights of bona fide purchasers. The distinction between the FIRs lies only in their immediate factual basis.

9. Crime No.470 of 2026 principally concerns the original sale transactions of the year 2004, wherein it is alleged that only certain survey numbers were disclosed while the remaining survey particulars and the link title documents were deliberately suppressed. The allegations relate to registered conveyances executed nearly twenty-one years prior to the registration of the FIR. Although delay by itself is not decisive, it assumes significance while considering the necessity of custodial interrogation, particularly when the prosecution case is founded entirely upon registered documents and public records already in the possession of the Investigating Agency.

10. Crime Nos.471 and 475 of 2026 primarily relate to the subsequent mortgage of the property, proceedings initiated under the SARFAESI Act, execution of Sale Deed No.60 of 2026, and the alleged acts of trespass and demolition. These allegations necessarily involve questions regarding the legal effect of mortgage transactions, proceedings before the DRT, measures taken under the SARFAESI Act, and competing claims of title and ownership, which are matters falling within the jurisdiction of competent civil courts and statutory forums.

11. Crime No.476 of 2026 is founded on the allegation that the accused suppressed the subsisting DRT attachment order, executed Sale Deed No.60 of 2026, and thereafter procured illegal mutations

and Pattadar Passbooks by manipulating the revenue records. Even these allegations substantially depend upon official records, revenue entries, proceedings before the DRT, and registered instruments, all of which are documentary in nature and are capable of independent verification by the Investigating Agency.

12. It is well settled that the mere existence of a civil dispute does not by itself exclude criminal liability. Equally, criminal law cannot be invoked to settle civil or property disputes unless the essential ingredients of the alleged offences are independently established. In *Mohammed Ibrahim v. State of Bihar*, (2009) 8 SCC 751, the Hon'ble Supreme Court held that the execution of a sale deed by a person claiming ownership ordinarily gives rise to civil consequences unless the statutory ingredients of offences such as forgery or cheating are made out. Likewise, in *VESA Holdings (P) Ltd. v. State of Kerala*, (2015) 8 SCC 293, the Hon'ble Supreme Court reiterated that disputes predominantly relating to title and contractual rights should not ordinarily be given a criminal colour.

13. The record further reveals that the prosecution case is founded almost entirely on documentary evidence, including registered sale deeds, mortgage documents, revenue and municipal records, proceedings before the DRT, mutation records, and other public documents, all of which have already been collected during the course

of investigation. No material has been placed before this Court to indicate that any incriminating article or undiscovered document remains to be recovered from the exclusive possession of the petitioner.

14. Further, Section 35 of the BNSS mandates that arrest must satisfy the statutory conditions and cannot be resorted to mechanically. In *Arnesh Kumar v. State of Bihar*, (2014) 8 SCC 273, the Hon'ble Supreme Court held that arrest should not be made routinely merely because an offence is cognizable. Similarly, in *Siddharam Satlingappa Mhetre v. State of Maharashtra*, (2011) 1 SCC 694, the Hon'ble Supreme Court emphasized that where custodial interrogation is not genuinely required, particularly when the investigation is based substantially on documentary evidence, anticipatory bail should ordinarily be extended to safeguard personal liberty.

15. In the present case, although the prosecution asserts that custodial interrogation is necessary to identify the role of the accused, confront the petitioner with the material collected, and unearth the alleged conspiracy, it simultaneously admits that the principal evidence consists of documentary records and witness statements that have already been collected during the investigation. A mere reference to the existence of a conspiracy, without any specific material demonstrating that the petitioner possesses exclusive information

incapable of being secured through any other mode of investigation, does not justify custodial interrogation.

16. The mere fact that the petitioner has been arrayed as an accused in multiple FIRs arising out of the same real estate venture cannot, by itself, constitute a ground to deny the relief of anticipatory bail. The multiplicity of complaints is attributable to different purchasers questioning substantially the same series of transactions. For the limited purpose of considering the petitioner's prayer for anticipatory bail, such multiplicity cannot automatically justify arrest in the absence of the statutory conditions contemplated under Section 35 of the BNSS.

17. Additionally, the petitioner is stated to be 74 years of age and suffering from age-related ailments. He has also undertaken to cooperate with the investigation. There is no material on record to suggest that he has either evaded the investigation or attempted to abscond. In the absence of any specific material demonstrating the indispensability of custodial interrogation, and having regard to the principles governing arrest and the grant of anticipatory bail as laid down by the Hon'ble Supreme Court, this Court is satisfied that the interests of the investigation can be adequately safeguarded by imposing appropriate conditions while extending to the petitioner the protection contemplated under Section 482 of the BNSS.

18. Accordingly, the Criminal Petitions are allowed. The petitioner/Accused No.1 shall be enlarged on anticipatory bail, subject to the following conditions:

a) The petitioner/Accused No.1 shall surrender before the Station House Officer, Patancheru Police Station, on or before 07.08.2026. Upon such surrender, or in the event of her arrest before the said date, the petitioner shall be released on bail by the Station House Officer upon executing a personal bond for a sum of Rs.25,000/- (Rupees Twenty-Five Thousand only), with two sureties for a like sum each, in each of the crimes, to the satisfaction of the said officer.

b) The petitioner shall furnish their complete residential addresses and contact details to the Investigating Officer and shall keep the same updated throughout the proceedings before the trial court.

c) The petitioner shall appear before the Investigating officer as and when directed for the purpose of investigation and shall cooperate with the investigation in all respects.

d) The petitioner shall neither directly nor indirectly induce, threaten, influence, or contact any prosecution witness, nor shall they tamper with the prosecution evidence in any manner whatsoever.

e) In addition, the petitioner shall abide by the conditions contemplated under section 438(2) of BNSS.

f) Any willful breach or violation of any of the aforesaid conditions shall render the petitioners liable to appropriate proceedings before the jurisdictional Court, including cancellation of bail, in accordance with the provisions of the BNSS and other applicable laws.

19. It is made clear that any observations made herein are confined solely to the adjudication of the present application for anticipatory bail and shall not be construed as an expression on the merits of the case. Pending miscellaneous applications, if any, shall stand closed.

N.TUKARAMJI, J

Date: 29.07.2026

MRKR

THE HONOURABLE SRI JUSTICE N.TUKARAMJI

CRIMINAL PETITION Nos.10502, 10531, 10536 and 10543 OF 2026

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