



**HARYANA REAL ESTATE REGULATORY AUTHORITY, PANCHKULA.**

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**Extract of the resolution passed by the Haryana Real Estate Regulatory Authority, Panchkula in its meeting held on 10.09.2025.**

**Item No. 299.24**

**Continuation of registration under Section-7(3) of RERA Act, 2016.**

**Promoter:** Model Economic Township Limited.

**Project:** "MET HIGHWAY MART" a commercial pocket measuring 4.96 acres forming part of an Industrial colony measuring 560.38 acres falling in the revenue estate of Village Dadri Toe, Yaqubpur, Sondhi, Tehsil Badli, Jhajjar.

**Reg. No.:** HRERA-PKL-JJR-234-2021 dated 18.03.2021 valid upto 01.03.2025. First Extension granted upto 01.06.2025.

**Temp ID:** 908-2021

**Present:** Sh. Sanjay Jindal & Sh. Sudhir Jain on behalf of the promoter.

1. Vide letters dated 28.03.2025 and 30.04.2025, the promoter had applied for continuation of registration of captioned project under Section- 7(3) of the RERA Act, 2016.

Following were submitted by the Promoter:

- i. Form REP-V along with Extension fee of ₹ 57,000/- via DD no. 506046 dated 25.05.2025 and its calculation which is in order.
- ii. Public Notice fee of ₹ 10,000/- along with Auditor Fee of ₹ 41,300/-.
- iii. A copy of the project registration certificate.
- iv. CA certificate stating percentage of Proportion of the cost incurred on Land Cost and construction cost to the total estimated cost as 80.18% till 31<sup>st</sup> December 2024.
- v. Certificate of engineer stating percentage of work done of External Development works as 84.04% and Internal Development works as 75.89% till 31<sup>st</sup> December 2024.
- vi. Certificate of Architect stating percentage of works done for Internal Roads & Pavements as 86.60%, water supply as 83.20%, Sewerage including treatment and disposal of sewage and sullage water/STP as 45.60%, Landscaping, tree plantation, Plaza as 11.8%



and Electrical Infrastructure including street lighting/electrification as 72.05% till 31<sup>st</sup> December 2024.

- vii. Environment clearance certificates dated 16.08.2012 and 09.08.2022.
  - viii. Photographs of the project.
  - ix. An Affidavit-cum-declaration from the promoter stating that the condition prohibiting the sale of any plot/unit does not apply to the project in question as the promoter is applying for an extension of the project before the expiry of the validity of registration i.e. 01.06.2025.
2. A public notice was issued by the Authority regarding the same on 21.05.2025 in two leading newspapers namely Dainik Bhaskar and The Indian Express.
3. Also the Auditor ( M/s Anuj Goyal & Associates) was appointed by the Authority for carrying out the audit of above cited project on 28.05.2025 vide Memo No. HRERA-PKL/ED/PROJ/2025/2025/10075-77.
4. Vide letter dated 08.08.2025, the Auditor submitted the Audit report of the above-said project.

Following observations were observed by the auditor which are as following:

#### **1. BRIEF FACTS OF THE CASE**

The brief facts and circumstances of the case in the background are as under:

- 1.1. That the "Auditee Company" started the above cited project on a land parcel of 3.96 acres situated in the Revenue Estate of Yakubpur, Sondhi, Tehsil Badli, District Jhajjar, Haryana, for which License no. 16 of 2018 in Form LC-V was issued by Directorate of Town and Country Planning (DTCP), Haryana, on 23.02.2018 which was valid upto 22.02.2023 and was last renewed upto 22.02.2028 in terms of Renewal letter dt. 26.06.2023 issued by DTCP, Haryana in favour of M/s Model Economic Township Limited - "Auditee Company" for setting up of Industrial Plotted Company.
- 1.2. That on the request of "Auditee Company", HRERA issued a corrigendum dt. 18.01.2023 wherein increased commercial area from 3.96 acres to 4.96 acres and a simultaneous increase in number of plots from 45 to 69 was acceded to.
- 1.3. That RERA Registration for the above cited project was received by the "Auditee Company" vide Registration no. HRERA-PKL-JJR-234- 2021 dated 18.03.2021. The RERA Registration was valid upto 01.03.2024 which was later on extended to 01.06.2025 by HRERA.



1.4. That our Professional Firm was appointed as the Auditor by the "Authority" to carry out the Audit of the above cited project of the "Auditee Company" supra vide appointment letter dt. 28.05.2025 wherein the scope of work was also defined by the "Authority".

1.5. That the "Auditee Company" has provided the information, details and documents upto 31.03.2025 and this Audit Report has been prepared accordingly.

## **2. AUDIT REPORT**

In terms of Appointment Letter dt. 28.05.2025, our professional firm has been directed to give a detailed report on various aspects mentioned in para (i) to (v) of para 1 of the said Appointment Letter. The point-wise report / observations are as under:-

**i. Detail of separate RERA Bank Account of the project in which 70% of the amount realized from the allottees are being deposited.**

❖ The "Auditee Company" is maintaining following **Collection Bank Accounts:-**

a) **HDFC Bank Ltd., Account no. 00440310000259**

IFSC Code: HDFC0000044

Branch Address: A-12, The Shopping Mall, DLF Qutub Enclave Phase 1, Gurgaon, Haryana - 122002

Title of the Account: M/s. MODEL ECONOMIC TOWNSHIP LTD.

**Note:** This is an **existing Bank Account as on RERA Registration dt. 18.03.2021.**

The Bank Statement for the period from 01.03.2021 to 31.03.2024 was provided to us.

This is a collection Account in which 100% moneys from Allottees are deposited.

Besides this, moneys from other sources / other projects are also deposited in this account. The closing balance as on 31.03.2024 of this Bank Account was ₹ 10,39,86,117.44/-

**This Bank Account is not in accordance with Section 4(2)(1)(D) of Real Estate (Regulation & Development) Act, 2016 read with Rule 4(4) of Haryana Real Estate (Regulation and Development) Rules, 2017 view of the following facts:-**

➤ That 70% of the amount realized for the present Real Estate project from the Allottees, from time to time must be deposited in a separate Bank Account to be maintained in a Scheduled Bank, **has not been done from this Account.**

b) **ICICI Bank Ltd., Account no. 459405000044**

IFSC Code: ICIC0004594

Branch Address: Highway Mart Reliance Met Ltd., SCO no. 22, 23 & 24, Sector 7A, ON SH 15, Dadri Toe, Jhajjar, Haryana - 124515 Title of the Account: M/s. MODEL ECONOMIC TOWNSHIP LTD.

**Note :** The Statement of this Bank Account for the period from 01.04.2024 to 31.03.2025 was provided to us. It is seen that the first credit entry in this Account appeared on 03rd April, 2024. This is collection Account in which 100% moneys from Allottees are deposited.



**This Bank Account is also not in accordance with Section 4(2)(1)(D) of Real Estate (Regulation & Development) Act, 2016 read with Rule 4(4) of Haryana Real Estate (Regulation and Development) Rules, 2017 in view of the following facts:-**

➤ That the **entire amount** realized for the present Real Estate project from the Allottees, from time to time, as deposited in this Account, has been transferred to ICICI Bank Ltd. Account no. 459405000037 as mentioned in clause (d) below as against transferring 70% of the amount realized from the Allottees.

❖ The "Auditee Company" is also maintaining following **RERA Bank Accounts:-**

c) **YES Bank Ltd., Account No: 000272400000022**

**IFSC Code: YESB00000002**

**Branch Address: G5, G6, Ff12 & F, fl4, Fortune Global Arcade, Sikanderpur, Mehrauli, Gurgaon 122001**

**Title of the Account: M/s. MODEL ECONOMIC TOWNSHIP LTD. MET HIGHWAY MART**

**Note:** The Statement of this Bank Account for the period from 01.01.2021 to 31.12.2023 was provided to us. It is seen that the first credit entry in this Account appeared on 22<sup>nd</sup> Sept., 2021. This is a RERA Account as informed by the "Auditee Company". It is noted that the 100% moneys received from Allottees in Collection Accounts as mentioned in (a) above are transferred to this Account as against 70% as per law. Accordingly, **this Bank Account is also not in accordance with Section 4(2) (1)(D) of Real Estate (Regulation & Development) Act, 2016 read with Rule 4(4) of Haryana Real Estate (Regulation and Development) Rules, 2017.**

d) **ICICI Bank Ltd., Account No: 459405000037**

**IFSC Code: ICIC0004594**

**Branch Address: Highway Mart Reliance Met Ltd., SCO no. 22, 23 & 24, Sector 7A, ON SH 15, Dadri Toe, Jhajjar, Haryana - 124515**

**Title of the Account: M/s. MODEL ECONOMIC TOWNSHIP LTD. MET HIGHWAY MART**

**Note:** The Statement of this Bank Account for the period from 01.04.2024 to 31.03.2025 was provided to us. It is seen that the first credit entry in this Account appeared on 05th April, 2024. This is a RERA Account as informed by the "Auditee Company". It is noted that the 100% moneys received from Allottees in Collection Accounts as mentioned in (b) above are transferred to this Account as against 70% as per law. Accordingly, **this Bank Account is also not in accordance with Section 4(2)(1)(D) of Real Estate (Regulation & Development) Act, 2016 read with Rule 4(4) of Haryana Real Estate (Regulation and Development) Rules, 2017.**

**ii. Amount Received from the allottees shall be verified i.e. receipts issued shall be verified with the amount received in the Bank.**

The following information has been provided by the "Auditee Company" as at 31.03.2025 in respect of the Project under Audit :-



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➤ The project named "Met Highway Mart" under audit is a Commercial / Industrial Colony, **The project is having 69 total number of plots.**

➤ That the "Auditee Company" has received an aggregate amount of ₹ 27.58 crores from Allottees till 31.03.2025 towards the part sale consideration of commercial plots sold by the "Auditee Company".

➤ We have verified on test check basis the amounts received from the allottees with the receipts issued and the amount received in the Bank Account no. 00440310000259 (from 01.03.2021 to 31.03.2024) maintained with HDFC Bank Ltd. having branch at A- 12, Shopping Mall, DLF Qutub Enclave, Phase I, Gurgaon and in the Bank Account no. 459405000044 (from 01.04.2024 to 31.03.2025) maintained with ICICI Bank Ltd. having Branch at SCO no. 22, 23 & 24, Sector 7A, On SH 15, Dadri Toe, Jhajjar, Haryana- 124515, **an Account in which 100% amounts realized from the Allottees is deposited.**

➤ The details of Amounts received from Allottees is attached herewith as "Annexure-I" in support of above data, which forms an integral part of this report.

**iii. The Auditor shall certify that provisions of Section 4(2) (I) (D) of the Real Estate (Regulation and Development) Act, 2016 are being followed and withdrawals are in proportion of the development works carried undertaken at site. If not, then utilization and diversion details of the funds should also be mentioned.**

The following information / documents have been provided by the "Auditee Company" for certifying the provisions of **Section 4(2) (I)(D) of the Real Estate (Regulation and Development) Act, 2016 :-**

- Copies of Architect's Certificates issued from time to time.
- Copies of Engineer's Certificates issued from time to time.
- Copies of CA Certificates obtained issued from time to time.

On going through the above certificates and other documents as produced before us and as per the information and explanation provided to us by the "Auditee Company" and the facts and circumstances narrated hereinabove, we hereby certify that the provisions of **section 4(2)(I)(D) of the Real Estate (Regulation and Development) Act, 2016 are being followed and withdrawals are in proportion of the development work carried/ undertaken at site subject to our remarks / notes under para i.(a), i.(b), i.(c) and i.(d) above.**

However, as per third proviso to Section 4(2)(I)(D) of the Estate (Regulation and Development) Act, 2016, the promoter shall get his accounts audited within six months after the end of every financial year by a Chartered Accountant in Practice, and shall produce Statement of Account duly certified and signed by such Chartered Accountant and it shall be verified during the Audit that the amounts collected for a particular project have been utilised for the project and withdrawal has been in compliance with the proportion to percentage of completion of the project.

In this connection, it is stated that a **specific year wise Audit Report / CA Certificate pursuant to third proviso to Section 4(2)(I)(D) of the Real Estate**



(Regulation and Development) Act, 2016 has not been produced before us for our verification, by the "Auditee Company" and, hence, the above proviso has not been complied with.

**iv. Site Visit and Site details. Assessment of work done duly supported by the photographs.**

- The undersigned partner of our professional firm personally visited the Project site on 02nd June, 2025 (Monday) by his own Motor Car and reached the site at around 09:30 a.m. The distance between the office of our professional firm and the Project site is around 68 kms. by road.
- Sh. Gulshan Kumar, Chartered Accountant and Sh. Anil Sharma, AVP (Infra) on behalf of the "Auditee Company" were available on the project site and the entire site was visited with the help of both the officials of the "Auditee Company" who explained the entire details of the project under audit.
- The Project under Audit has been named by "Auditee Company" as **Met Highway Mart** and comprises of 69 commercial Plots, **The construction of some of the Commercial Plots so allotted by the "Auditee Company" was ongoing.**
- The undersigned captured various photographs of the project site from his own mobile and out of that **14 (fourteen) photographs are attached herewith** forming an integral part of this report.

**Verification of Surrendered/ Resumed/ Cancelled/ Restored Plots.**

As informed by the "Auditee Company", **there is no Surrendered, Resumed, Cancelled and Restored plots as per the information provided by the "Auditee Company".** The Nil report of Surrendered, Resumed, Cancelled and Restored plots in the project, duly certified by the "Auditee Company" are attached herewith as "**Annexure - III**", forming an integral part of this report.

**This Audit Report has been prepared on the basis of documents and other records produced before us and as per the information and explanation provided to us by the "Auditee Company" which was represented by Sh. Gulshan Kumar, Chartered Accountant and Sh. Anil Sharma, AVP (Infra) of the "Auditee Company".**

5. A copy of the said Audit report was sent to the Promoter vide e-mail dated 12.08.2025 and hard copy of the same was handed over to the promoter on 20.08.2025 for their comments on this Audit report.
6. Vide reply dated 01.09.2025, the promoter has submitted the following are our replies to the observations made in the Audit Report:

**Details of the project**

The audit report has omitted to mention details of second license no. 64 of 2022 for 1 acres, which together with license no. 16 of 2018 constituted the entire registered project of 4.96 acres.



The audit report has also omitted to mention corrigendum no. HRERA-55-2023 dated 18<sup>th</sup> January, 2023, through which an additional area of 1 acre was added in existing project area of 3.96 acres.

**i. Details of separate RERA Bank Account of the project in which 70% of the amount realized from the allottees are being deposited**

As per the audit reference of this Hon'ble Authority, the auditor was to provide the details of Bank Account of the project in which 70% of the amount realized from the allottees were deposited and not the collection bank account.

As against the above reference, audit report has provided details of bank accounts in which collection received from customers was provided in the report of the auditor.

While the details provided in the report are factually correct, we wish to add that the collection account was changed to ICICI Bank account no. 459400000044 as HDFC closed all the accounts in view of guidelines of RBI on current accounts.

This Hon'ble Authority, on application made by METL, in its meeting held on 9<sup>th</sup> October, 2024, vide item no. 266.33, decided to allow change in bank accounts of METL.

While giving the details of collection accounts, though the report has mentioned that 100% collection was deposited in these bank accounts but has wrongly mentioned that both the bank accounts are not in accordance with section 4 (2) (I) (D) of Real Estate (Regulation and Development) Act 2016 read with rule 4 (4) of Haryana Real Estate (Regulation and Development) Rules 2017.

The above observation of the audit report with regard to collection accounts is not correct with respect to provisions of section 4 (2) (I) (D) of the Act as the provisions of this section are applicable for withdrawal of funds from the bank account in which 70% of the collection received from allottees are deposited (and not the collection accounts), which is incidentally second reference of this Hon'ble Authority.

The audit report has also mentioned details of bank accounts in which 70% of the collections received from allottees is required to be deposited. The audit report has mentioned that 100% of the amount collected from the allottees has been deposited in these bank accounts as against 70% as per the law. Accordingly, these bank accounts are not in accordance with section 4 (2) (I) (D) of Real Estate (Regulation and Development) Act 2016 read with rule 4 (4) of Haryana Real Estate (Regulation and Development) Rules 2017.

The above observation of the audit report is not correct as the law mandates transfer of 70% of collection whereas we have deposited 100% collection.

**ii. Amount Received from the allottees shall be verified i.e. receipts issued shall be verified with the amount received in the Bank**

Auditor has verified the amount received from allottees with receipts issued to them and provided the details, hence no comments are required from our side.

**iii. The Auditor shall certify that provisions of Section 4(2)(I)(D) of the Real Estate (Regulation and Development) Act, 2016 are being followed and withdrawals are in proportion of the development works carried undertaken at site. If not, then utilization and diversion details of the funds should also be mentioned**



Since the auditor has certified that the provisions of section 4(2)(l)(D) of the Real Estate (Regulation and Development) Act, 2016 are being followed and withdrawals are in proportion of the development work carried/ undertaken at site, hence no comments are required from our side.

Though the reference was limited to auditor's certification that provisions of Section 4(2)(l)(D) of the Real Estate (Regulation and Development) Act, 2016 are being followed and withdrawals are in proportion of the development works carried undertaken at site, the Auditors has further commented that

*"However, as per third proviso to Section 4(2)(l)(D) of the Real Estate (Regulation and Development) Act, 2016, the promoter shall get his accounts audited within six months after the end of every financial year by a Chartered Accountant in Practice, and shall produce a Statement of Account duly certified and signed by such Chartered Accountant and it shall be verified during the Audit that the amounts collected for a particular project have been utilised for the project and the withdrawal has been in compliance with the proportion to the percentage of completion of the project. In this connection, it is stated that a specific year wise Audit Report /CA Certificate pursuant to third proviso to Section 4(2)(l)(D) of the Real Estate (Regulation and Development) Act, 2016 has not been produced before us for our verification, by the "Auditee Company" and, hence, the above proviso has not been complied with."*

Though the above observation of the auditor is not as per the reference made by this Hon'ble Authority, which was limited to certifying the compliance of the Act with regard to withdrawal of funds from 70% bank account, which auditor has certified to be fully compliant, we would still like to clarify that as per our knowledge there is no specific regulation by this Hon'ble Authority, neither any formats prescribed for the purpose, to produce a Statement of Account duly certified and signed by a Chartered Accountant in practice verifying that the amounts collected for a particular project have been utilised for the project and the withdrawal has been in compliance with the proportion to the percentage of completion of the project. We would be happy to submit such certificate as soon as this Hon'ble Authority notifies the Regulations and format for the said purpose.

**iv. Site Visit and Site details. Assessment of work done duly supported by the photographs**

Site Visit and Assessment work was duly carried out by the Auditor and auditor has submitted few site photographs, hence no comments are required from our side.

**v. Verification of Surrendered/ Resumed/ Cancelled/ Restored Plots**

Since, there are no surrendered/resumed/cancelled/restored plots as per report from the auditor, hence no comments are to be required from our side.

7. The Auditor in its audit report has pointed out that third proviso to section 4(2)(1)(d) has not been complied since annual audit report/ CA certificate has not been produced by the promoter company. However, Sh. Sudhir Jain appearing on behalf of promoter informed that company usually gets the audit conducted and will submit a copy of all audited reports from



the date of registration till date with in 60 days. The Authority after consideration decided that registration certificate shall remain in force under section 7(3) of the RERD Act, 2016. The registration shall therefore, be valid upto 01.06.2026. The promoter shall submit a copy of the annual audit with in a period of 60 days from the date of grant of certificate of continuation of registration. Disposed of.



True copy

  
Executive Director,  
HRERA, Panchkula

A copy of the above is forwarded to CTP, HRERA Panchkula, for information and taking further action in the matter.

  
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All CA's (Shubram, Tushar, Karamjeet, Dyrav, Indu)

STP

