**BEFORE THE DISTRICT CONSUMER DISPUTES REDRESSAL COMMISSION, COSMOS**

**Complaint No. \_\_\_\_\_\_ of 20\_\_**

**Bruno,**  
Aged 45 years,  
Occupation: Graphic Designer,  
Residing at 56/879, 4th Street, Sunset Avenue, Cosmos-32,  
...Complainant

**Vs.**

1. **Cenza Bank Private Limited,**  
   2nd Cross Street, Jeevan Nagar, Cosmos-60,  
   ...Opposite Party No. 1
2. **Kelps Insurance Private Limited,**  
   23/456, 2nd Street, Sunset Avenue, Cosmos-45,  
   ...Opposite Party No. 2

**COMPLAINT UNDER SECTION 35 OF THE CONSUMER PROTECTION ACT, 2019**

**RESPECTFULLY SHOWETH:**

1. The complainant is the nominee of a life insurance policy taken out for his daughter from Kelps Insurance Private Limited, Policy Member ID: 20234567. Upon the unfortunate demise of his daughter on 04/03/2018, the complainant was entitled to the sum assured by the policy.
2. The complainant was informed by Kelps Insurance that the sum assured had been disbursed. However, upon contacting Cenza Bank, where the complainant's daughter had an outstanding educational loan, it was revealed that the insurance proceeds had been set off against the loan balance without prior notice to or consent from the complainant.
3. The complainant had made several attempts to resolve this issue through communication with both the bank and the insurance company, sending emails on 20/11/2018, 01/12/2018, and 10/12/2018, and issuing a legal notice on 15/12/2018, but to no avail.
4. **CAUSE OF ACTION** arose on 04/03/2018, the date of the daughter's passing, and was further aggrieved by the unauthorized set-off conducted by Cenza Bank as informed to the complainant after the fact.
5. **JURISDICTION:** This Hon'ble Commission has jurisdiction as the cause of action, partly or wholly, arises within its territorial limits.
6. **LIMITATION:** The complaint is filed within the statutory period of two years from the date of cause of action, in accordance with the limitation period prescribed under the Consumer Protection Act, 2019.
7. **COURT FEE:** As the claim value is less than Rs 5 lakhs, no court fee is payable under the current rules. However, necessary documents as prescribed are attached herewith.

**PRAYER:** The complainant prays for the Commission to:

* Direct Kelps Insurance Private Limited to credit the sum assured into the complainant's account.
* Order both Opposite Parties to jointly and severally pay Rs 1,00,000/- as compensation for mental distress and legal expenses incurred.
* Provide any other relief deemed just and proper by the Commission.

**PLACE:** Cosmos  
**DATE:** [Date of Filing]

**[Signature of the Complainant]**  
Bruno