**BEFORE THE HON’BLE DISTRICT CONSUMER DISPUTES REDRESSAL COMMISSION AT MOGA IN RE: COMPLAINT NO. \_/20**

IN THE MATTER OF:

Veer Pal Singh,

S/o Balwinder Singh

Residing at Viskarma Mohalla,

Amritsar Road, Kot Ise Khan,

Tehsil Dharamkot District,

Moga, Punjab ………Complainant

Versus

Ford Club Travel Pleasure,

Plot No. 738, JLPL Industrial Estate,

Sector-82,

Mohali, India-160055 ............Opp. Party

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

**RESPECTFULLY SHOWETH**:

1. That the Complainant herein, Mr. Veer Pal Singh, S/o Balwinder Singh, aged 36 years is a software engineer residing at Viskarma Mohalla, Amritsar Road, Kot Ise Khan, Tehsil Dharamkot District, Moga, Punjab. The Opposite Party herein, Ford Club Travel Pleasure, is a company, registered under the Companies Act, engaged in the business of providing travel services, with its sales office situated at Plot No. 738, JLPL Industrial Estate, Sector-82, Mohali, India-160055.
2. That the Complainant availed the membership of Ford Club Travel Pleasure by paying a sum of 1,90,000 Rs. in instalments. By virtue of the membership, the Complainant was entitled to premium tours to Dubai and other countries popular for tourism at discounted rates. Therefore, the Complainant, as a member, booked a tour to Dubai through Ford Club Travel Pleasure.
3. That the Complainant booked the Dubai tour on 1st March 2022, for a period from 24.3.2022 to 28.3.2022, with a cost of 39,487 Rs. for flight tickets, and 18,000 Rs. for accommodation in a hotel. The booking was made via the website of the OP and the payment for the same was made via bank transfer.
4. That the Complainant was assured that the hotel accommodation would be in Movenpick Hotel and Apartment, Bur Dubai, a five-star facility. However, after booking, the Complainant was informed that the booking in the five-star hotel was cancelled, and an additional amount of 18,000 Rs. had to be paid for booking in Movenpick. The Complainant paid the additional amount, but upon reaching Dubai, found out that instead of being booked a room in Movenpick, the Complainant was booked a room in ABC Hotel, which is not a five-star facility, and was of substandard quality.
5. That the Complainant initiated communication with Ford Club Travel Pleasure after the tour, highlighting the substandard quality of the hotel and seeking a refund. However, Ford Club refused to accept their fault.
6. **CAUSE OF ACTION**: That the Complainant, by relying on the Opposite Party's representation of a five-star hotel stay in Dubai, suffered a deficiency in service and false representation. The Complainant seeks redressal for the financial loss incurred and the mental agony faced due to the Opposite Party's misleading information.
7. **EVIDENCE:** That the Complainant attaches herewith the invoices for membership, the membership ID, the flight tickets, the hotel tickets, the payment of additional sum, along with emails and Whatsapp messages exchanged between the Complainant and Ford Club Travel Pleasure, in particular the communication in relation to the cancellation of the initial hotel booking.
8. **JURISDICTION**: That The Hon’ble District Consumer Disputes Redressal Commission has territorial jurisdiction to conduct an enquiry and adjudicate the present dispute since the Complainant resides in Moga, Punjab, and Ford Club Travel Pleasure carries on its business in Mohali, Punjab. Further, the consideration is within the pecuniary limit prescribed under the Consumer Protection Act, 2019.
9. **LIMITATION:** That the cause of action arose when the Complainant, despite having paid an additional amount of 18,000 Rs.,was provided a substandard tour from 24.3.2022 to 28.3.2022. Therefore, the Cause of Action arose during the tour which took place from March, 2022. The said matter falls within the two-year limitation period specified under Section 69 of the Consumer Protection Act, 2019.
10. **COURT FEE**: That the Complainant is complying with the Court Fees Mandated under Rule 7 of the Consumer Protection (Consumer Dispute Redressal Commission) Rules, 2020.
11. **PRAYER:** That the Complainant is seeking the following reliefs from this Hon’ble Commission:-

A. Direct the Opposite Party to refund the membership fees of 1,90,000 Rs., the cost of flight tickets of 39,487 Rs., and the additional amount paid for the hotel accommodation of 18,000 Rs.;

B. To Direct the payment of Compensation to the tune of 1,00,000 Rs. for mental agony; and

C. To direct any other relief that the Hon’ble Commission deems fit.

PLACE: Moga, Punjab

DATED: SIGNATURE OF THE COMPLAINANT

VERIFICATION:-

I, Veer Pal Singh, S/o of Balwinder Singh, residing at Viskarma Mohalla, Amritsar Road, Kot Ise Khan, Tehsil Dharamkot District, Moga, Punjab, do hereby solemnly affirm and declare that the facts stated above in paras 1 to 11 are true to the best of my knowl­edge and based on the records maintained by me, which I believe to be true.

Verified at, on this \_ day of\_\_

**ANNEXURE OF EVIDENCE**