BEFORE THE HON’BLE DISTRICT CONSUMER DISPUTES REDRESSAL COMMISSION AT SONEPAT

IN RE: COMPLAINT No. [Your Complaint Number] of 20[XX]

IN THE MATTER OF:

Lokesh S/o Jai Singh   
Pabsra,   
Tehsil Rai, Sonepat

...... COMPLAINANT

Vs.

Jaggi Kaushik Motors   
Sonepat

............. OPPOSITE PARTY

COMPLAINT UNDER SECTION 12 of CONSUMER PROTECTION ACT

RESPECTFULLY SHOWETH:

1. The complainant, Mr Lokesh, purchased a second-hand Hyundai i20 car with registration number HR-10Z-8449, Model 2015, from Jaggi Kaushik Motors.
2. The purchase agreement and related documents are attached and marked as Annexure-A for reference.
3. The complainant paid a total amount of 4.25 lakhs for the car, including 20,000 as token money. The odometer reading at the time of purchase, as represented by the seller, was 58,165 kms.
4. The second-hand car exhibited multiple defects, including low pickup, extra noise, low mileage, and steering issues. Despite the complainant's request, Jaggi Kaushik Motors failed to address and repair these defects.
5. On 27.12.2021, the complainant took the car to Malwa Motors, an authorized Hyundai service center, where it was revealed that the actual odometer reading was 165,227 kms, significantly different from the representation made by Jaggi Kaushik Motors.
6. The complainant has photographic evidence taken at Malwa Motors, demonstrating the true mileage of the car. This evidence is attached and marked as Annexure-B.
7. The complainant, in good faith, reached out to Jaggi Kaushik Motors for resolution, but the dealership denied any misrepresentation. The complainant also discovered fraudulent practices through a communication dated 22.09.2021, where the dealership sent a picture of the car with a false mileage of 58,165 kms.
8. The complainant has faced mental harassment and financial loss due to these misrepresentations and defects.

EVIDENCES:

1. Purchase agreement and related documents (Annexure-A)
2. Photographic evidence from Malwa Motors (Annexure-B)
3. Communication dated 22.09.2021 showing false mileage representation

TERRITORIAL JURISDICTION: The complainant resides within the jurisdiction of this Hon'ble Commission. Hence this Hon'ble Commission has jurisdiction to try and entertain this complaint.

PECUNIARY JURISDICTION

The total consideration amount paid in purchasing the insurance policy is less than Rs. 50 lakhs. hence this hon'ble commissin has jurisdiction to entertain this complaint.

LIMITATION: That the present complaint is being filed within the period of 2 years prescribed under section 69 of the Act, 2019.

COURT FEE: Requisite Court fee as contemplated is paid on this Complaint.

PRAYER:

The complainant prays:

i) For a refund of the entire purchase amount of 4.25 lakhs.   
ii) Compensation of 50,000 for mental harassment.   
iii) Any other relief deemed fit by the Hon’ble Consumer Forum.

PLACE:

DATED:

NAME OF THE COMPLAINANT

VERIFICATION

I, [Your Full Name], resident of [Your Address], hereby declare that I have not misrepresented any facts nor have tried to hide any information in my above complaint. All the facts mentioned herein are true to the best of my knowledge.

Name & signature of the complainant