**BEFORE THE DISTRICT CONSUMER DISPUTES REDRESSAL FORUM AT NORTH GOA, PROVORIM**

Consumer Case No. \_\_\_ of 20

Ranjana Ferrao Corderio

Occupation: Professional Chef

R/o Flat No. S-3,

Building No. 6

Kamat Complex, Caranzalem, Goa ...Complainants

V/s

M/s Trail Blazer Tours Pvt Ltd 201 & 204, 2nd Floor

Gera’s Imperium II Patto Plaza, Panaji

Goa – 403001 …Opposite Parties

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

1. The address of the Complainant for the purpose of service of summons, notice etc is as shown in the cause title above and that of his counsel
2. The address of the Opponents for the very purpose is the same as shown in the cause title above.
3. Herein the above-named Complainant most respectfully submits as under,
4. That the Complainants had booked the ‘Magical Kenya and Tanzania’ honeymoon tour package from the Opposite Party No. 1 vide booking no. 8787 dated 10/09/2018 for USD 4113 per person totaling Rs. 5,98,600/- (Rupees Five Lakhs Ninety-Eight Thousand Six Hundred Only) for visiting tourist destinations in Kenya and Tanzania through Opposite Party Nos. 2 & 3.
5. That the Opposite Party No. 1 displayed gross negligence and deficiency in services by arbitrarily changing the tour itinerary after the commencement of the tour on 02/12/2018, providing hotel accommodation not as per the agreed itinerary, vehicle breakdown during the jungle safari, dropping clients at the airport 7 hours before departure and serving poor quality food – all of which led to immense mental harassment and trauma to the Complainants who were on their honeymoon tour.
6. That the Opposite Parties are thus jointly and severally guilty of indulging in unfair trade practice and deficiency in service as defined under Section 2(1)(g) and 2(1)(o) of the Consumer Protection Act, 1986 thereby causing significant monetary loss and mental agony to the Complainants.

**IV. Cause of Action:**

4**.** The cause of action to file this 02/12/2008 when the Opposite Party No. 1 displayed gross negligence and deficiency in services by arbitrarily changing the tour itinerary after the commencement of the tour, providing hotel accommodation not as per the agreed itinerary, vehicle breakdown during the jungle safari, dropping clients at the airport 7 hours before departure

**IV. Jurisdiction:**

4. As the consideration paid for the service availed is less than Rupees 50 lakhs, and the cause of action is within the jurisdiction of this Hon’ble Court, therefore the complaint is being filed with the Hon’ble District Consumer Disputes Redressal Commission, North Goa.

**V. Limitation:**

5. That the present complaint is being filed within a period of two years from the date of cause of action i.e date of the incident, as prescribed under section 69 of the Act, 2019

**VI. Court Fees:**

6. In line with Rule 7 of Consumer Protection (Consumer Dispute Redressal Commission) Rules, 2020, no court fee has been paid as the value of the impugned product is less than Rs 5 lakhs and stipulated three copies of the complaint have been submitted.

**VII. Prayer**

7. In the light of the above submissions, the Complainants most respectfully pray that this Hon’ble Forum may be pleased to:

* 1. Direct the Opposite Parties to jointly and severally pay a sum of Rs. 5,00,000/- (Rupees Five Lakhs Only) to the Complainants as compensation for mental harassment and suffering caused by deficiency in service;
  2. Direct the Opposite Parties to pay Rs. 50,000/- (Rupees Fifty Thousand Only) to the Complainants as costs of the litigation proceedings;
  3. Pass any such further or other orders as this Hon’ble Forum may deem fit and proper in the interests of justice.

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_ Advocate for Complainant

Place: \_\_\_\_\_\_\_\_\_\_\_\_

**VERIFICATION**

I, Mr. Ranjana Ferrao Corderio, the Complainant do hereby verify that the contents of the complaint are true and correct to my knowledge and nothing material has been concealed therefrom. Verified at Panaji on this \_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_ 20\_\_\_.

Date:

Place: Complainant