



GOA REAL ESTATE REGULATORY AUTHORITY

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FN0: 3/RERA/Complaint(586)/2026/1451

Date: 29/09/2026

Goeinho Social and Consumer Forum

S-3/4, Second Floor, Salkar Residency,

Adarshnagar, Chicalim Vasco, Goa-403711.

Complainant

V/s

Messers ALYF

9th floor, Pavilluon Business Square,

902-905, B-18, SG Barve Marg,

Sindhu Society, Chembur,

Mumbai, Maharashtra.-400071.

Respondent

Ld. Adv.Ninio J Correia remained present in person.

ORDER

(Delivered on this 29th day of the month of September, 2026)

Case of the Complainant

An online Complaint was filed on 09/05/2026 by the above Complainant. The Complainant submitted that:-

1. That the Respondent, through its official Instagram page titled "alfy.in", has published an advertisement marketing its real estate project named "**Villamor**" located at Socorro, North Goa.

2. That the said Instagram advertisement claims that the project comprises Fully Furnished 3.5 BHK villas with Private Pools, Fully Managed Ownership, nearing completion and that only two villas remain unsold.
3. Another advertisement released by the Respondent under the title "Villamor SOCORRO, NORTH GOA by ALYF Xclusive" provides further promotional details of the project.
4. Additionally, on the real estate website "Houssed", the project is actively marketed. This advertisement reveals that the project consists of 8 units and also discloses the approximate location via Google Maps.
5. Upon independent research and verification of the Google Map location, it has been established that the project is being developed on land bearing Survey No. 204/4 of Socorro Village, Bardez Taluka, Goa. The Form I & XIV records of the said parcel confirm that the land area measures 2,125 sqm.
6. A physical inspection of the project site revealed that no statutory display board has been erected at the location, as mandated by law, to indicate details of approvals granted by competent authorities such as Construction License, Technical Clearance, Conversion Sanad, etc.
7. Further, a search on the RERA Goa website shows that no registration details of the said project are available.



8. That the Respondent is in blatant violation of statutory requirements, including failure to register the project under RERA as mandated by Section 3 of the Real Estate (Regulation and Development) Act, 2016.

9. Relief(S) Sought:

- a) To direct the Respondent to register the project with complete details on the RERA Goa website.
- b) To, direct the Respondent to erect a display board at the project site specifying all approvals obtained for the project.
- c) To, initiate criminal proceedings against the Respondent for wilful violation of the Real Estate (Regulation and Development) Act, 2016.
- d) To, impose penalties on the Respondent as per law for failure to register the project under Section 3 of the Act.
- e) To, direct reimbursement of fees paid by the Complainant along with costs.

10. Grounds

- a. The Respondent has failed to register the project with RERA prior to advertising and/or sale of villas.
- b. The Respondent has failed to display the mandatory project approval board at the site.
- c. The project land area exceeds 500 sqm and comprises 8 units, thereby mandating registration under RERA prior to sale or advertisement.



11. Interim order

- a. Restrain the Respondent/promoter from selling any units of the project.
- b. Direct the State Registrar to refuse registration of any Sale Deed pertaining to the project until RERA registration is duly completed.

12. A notice dated 21/08/2026 was issued for appearance of complainant. The complainant filed the requisite documents. During the course of hearing. The Complainant was directed to establish if his complaint is maintainable before the Authority. The complainant filed a Note on maintainability and locus standi dated 21/09/2026, and argued the matter.

13. The complainant filed a Note on maintainability and locus standi to address and clarify the query raised, concerning the maintainability of the complaint and, in particular, the locus standi of the Complainant, Goencho Social and Consumer Forum, to institute and sustain these proceedings under Section 31 read with Section 2(zg) of the RERA Act. The statutory framework, reinforced by judicial precedent, unequivocally establishes that voluntary consumer associations duly registered under law are entitled to invoke the jurisdiction of the Authority. The submissions made by the complainant are as follows:-



14. STATUTORY BASIS UNDER SECTION 31

- i. That Section 31 of the RERA Act provides the statutory foundation for filing complaints before the Authority. Section 31 of the RERA Act states as below;

"(1) Any aggrieved person may file a complaint with the Authority or the adjudicating officer, as the case may be, for any violation or contravention of the provisions of this Act or the rules and regulations made thereunder against any promoter allottee or real estate agent, as the case may be.

Explanation — For the purpose of this sub-section "person" shall include the association of allottees or any voluntary consumer association registered under any law for the time being in force.

(2) The form, manner and fees for filing complaint under sub-section (1) shall be such as may be specified by regulations"

- ii. That the Complainant does not assert locus standi on the basis of being an allottee of any unit in the Respondent's project. Rather, it asserts locus in its institutional capacity as a voluntary consumer association duly registered under law, a category squarely and expressly recognized by the Explanation to Section 31(1) of the RERA Act.
- iii. That the issue, therefore, is not whether the Forum has purchased or been allotted any villa in the Respondent's project. The real question is whether the Forum squarely falls within the statutory expression "voluntary consumer association registered under any law for the time being in force," as expressly contemplated by the Explanation to Section 31(1) of the RERA Act.
- iv. That the Complainant, Goencho Social and Consumer Forum, is a society duly registered under the Societies Registration Act,

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1860, bearing Registration No. 68/Goa/2026 dated 04.06.2026, issued by the competent authority of the Government of Goa.

- v. That the Complainant further relies upon its Memorandum of Association, which unequivocally sets out the relevant objects and purposes for which the Forum has been constituted, directly connecting to the present case. These include, inter alia: "1. To unite and empower village communities across the State of Goa with a view to collectively protect and promote their civic and consumer rights" and "7. To approach competent legal, quasi-judicial and administrative authorities, tribunals or courts of law in matters concerning public interest, civic welfare, consumer rights and community rights, including the filing of public interest litigations (PILs) or representations".
- vi. That the stated objects unequivocally demonstrate the Forum's mandate to act in the capacity of a voluntary consumer association registered under law, thereby satisfying the statutory requirement under Section 31 of the RERA Act.
- vii. That Section 31(2) of the RERA Act prescribes the form, manner, and fees for filing a complaint before the Authority. The Complainant has duly complied with these procedural requirements, thereby satisfying all statutory preconditions for the institution of the present proceedings.

15. DEFINITION OF 'PERSON' UNDER SECTION 2(ZG)

- i. That Section 2 of the RERA Act contains the definitions applicable to the statute. In particular, Section 2(zg) defines the expression "person" and expressly includes, inter alia, "an association of persons or a body of individuals whether incorporated or not." This

inclusive definition makes it abundantly clear that the term "person" under the Act is not confined to natural individuals or allottees alone, but extends to collective entities such as civic and consumer forums, thereby encompassing the present Complainant within its scope.

- ii. That the statutory definition therefore makes it clear that the expression "person" under the RERA Act is not confined to a natural individual or an allottee alone. Parliament, at the time of enactment, expressly extended the definition to include "an association of persons or a body of individuals, whether incorporated or not," thereby ensuring that collective entities such as civic and consumer forums fall squarely within its ambit.
- iii. That the Complainant, Goencho Social and Consumer Forum, as stated above is a society duly registered under the Societies Registration Act, 1860, bearing Registration No. 68/Goa/2026 dated 04.06.2026, issued by the competent authority of the Government of Goa.
- iv. That the Complainant, being a duly registered society consisting of an association of persons, squarely falls within the broad statutory conception of "person" contained in Section 2(zg) of the RERA Act. The statutory text of Section 2(zg) expressly recognises associations of persons, bodies of individuals, and co-operative societies within the definition of "person," thereby making it abundantly clear that collective entities such as the present Forum are entitled to invoke the jurisdiction of the Authority.

16. BINDING PRECEDENT OF GOA RERA

- i. That in Colva Civic and Consumer Forum v. Ms. Sonia Lemos, Mr. Tony Rodrigues and T.R. Constructions, Goa RERA

Complaint No. 3/RERA/Complaint(449)/2024/237, decided on 28.02.2025, the Authority was directly confronted with the question of whether a registered civic/consumer forum, which was not itself an allottee, possessed locus standi to institute a complaint under Section 31 of the RERA Act.

- ii. That the facts recorded in the said order are particularly relevant, as the complainant therein was the Colva Civic and Consumer Forum, represented through its President/Secretary. In that matter, the respondents specifically challenged the complainant's locus on the ground that it was neither an allottee, nor an association of allottees, nor a voluntary consumer association registered under law.
- iii. That in adjudicating the matter, the Authority considered the scope of Section 31 of the RERA Act and specifically examined the registration certificate produced by the complainant forum. The Authority further recorded that the complainant had furnished a certificate issued by the District Registrar/Inspector General of Societies, along with a resolution duly authorising the Forum to initiate proceedings before competent legal, quasi-judicial, and administrative authorities.
- iv. That the Authority further recorded that the complainant forum was duly registered under the Societies Registration Act, 1860, and expressly held that it constituted a "voluntary consumer association" registered under law for the time being in force.
- v. That the Authority thereafter expressly held that the complainant forum possessed locus standi to file the complaint on behalf of consumers and the general public, being a voluntary consumer association duly registered under law.

vi. That the said finding is of direct relevance to the present proceedings. The factual and legal principle emerging from the order is that a registered civic/consumer forum does not lose locus merely because the forum itself is not an allottee of the project. Once the forum establishes that it is a voluntary consumer association duly registered under law, Section 31 of the RERA Act expressly permits it to approach the Authority. The order is particularly significant because it is a decision of Goa RERA itself, rendered in respect of the very statutory provision presently under consideration, and therefore constitutes a binding precedent squarely applicable to the present case.

17.APPLICATION TO PRESENT CASE

- i. That in the present case, the Complainant's position is materially similar to that of the complainant forum in the aforesaid Goa RERA order, inasmuch as:
 - a. The Complainant is a society duly registered under the Societies Registration Act, 1860;
 - b. The Complainant possesses a valid Certificate of Registration issued by the competent authority;
 - c. The Complainant has a Memorandum of Association clearly setting out its consumer-oriented objects;
 - d. The Complainant has adopted a formal resolution authorising the institution and conduct of RERA-related proceedings;
 - e. The Secretary has been duly authorised to represent the Forum;
 - f. The Forum has appointed counsel to conduct the proceedings; and
 - g. The present complaint concerns alleged violations squarely falling within the regulatory framework of the RERA Act.

- ii. That the Authority has already settled the issue in Complaint No. 3/RERA/Complaint(449)/2024/237, and consistency of adjudication requires that the same principle be applied herein.
- iii. Therefore, a joint reading of Section 31(1) and Section 2(zg) of the RERA Act clearly establishes the locus standi of the Complainant. Section 31(1) provides that "any aggrieved person may file a complaint", and the term "person" under Section 2(zg) expressly includes associations of persons or bodies of individuals, thereby encompassing the Complainant herein within its scope.

18. AUTHORITY'S SUO MOTU POWERS

- i. That Section 35 of the RERA Act confers upon the Authority the suo motu power to initiate investigations or proceedings on its own accord, if it has reason to suspect non-compliance with the provisions of the Act or the regulations made thereunder by a promoter or a real estate agent.
- ii. That in the present case, the Developer has evidently failed to register the project with the Goa RERA Authority and has nonetheless commenced marketing and promotion of the project. Such conduct constitutes clear non-compliance with the mandatory provisions of the RERA Act, thereby attracting the jurisdiction of the Authority.
- iii. That the Authority has not, as yet, initiated any suo motu proceedings against the said Developer/Promoter. Even if the Authority were now to constitute such proceedings under Section 35, the Complainant, being a duly registered voluntary consumer association, can materially assist in the effective adjudication of

the matter by placing relevant facts, documents, and submissions before the Authority.

- iv. That if the Authority itself can act suo motu in the public interest, it necessarily follows that a duly registered consumer forum acting on behalf of affected consumers must be recognized as having locus under Section 31.

19. PRAYER FOR RELIEF

Further the Complainant prayed that:-

- a. Declare that the Complainant, Goencho Social and Consumer Forum, possesses the requisite locus standi under Section 31 read with Section 2(zg) of the RERA Act;
- b. Affirm that the Complainant falls within the statutory expression of "aggrieved person" and "voluntary consumer association registered under any law for the time being in force";
- c. Proceed forthwith to hear and determine the complaint on its merits in accordance with law, in furtherance of consumer protection and public interest.

20.

ORDER

The matter was heard on 07/09/2026 and 22/09/2026 and argued on maintainability. It was indicated to the complainant that the complaint and the supporting documents produced by the complainant indicate the total number of units in the project as 8 only. The threshold for registration under Section 3 of the Real

Estate (Regulation and Development) Act, the requirements for RERA registration is more than 8 units and, area more than 500 sq mts. This is not being manifested in this complaint in terms of evidence produced. Despite the opportunity given, the counsel was unable to achieve any evidence to the contrary. Therefore, as one of the twin requirements mandatory for registration of a project under Section 3 of the Real Estate (Regulation and Development) Act, 2016, not being met in the facts of this case, the reliefs sought by the complainant cannot be granted under RERA and, hence this complaint is dismissed.


Dharmendra Sharma, IAS(Retd)
Chairperson, Goa RERA