



07077513836

 eluyefachambers@gmail.com

To:

The Officer-in-Charge
Economic and Financial Crimes Commission (EFCC)
Lagos Zonal Office
No. 15A, Awolowo Road
Ikoyi, Lagos
Nigeria
Email: info@efcc.gov.ng

CC:

The Managing Director
PWAN Group
Floor 1 to 5, Puri Mall Building
Km 25, Lekki-Epe Expressway
Opposite Lagos State University (LASU)
Oko Ado, Ajah, Lagos State
Nigeria
Email: info@pwangroup.com, pwanpronigeria@gmail.com

PETITION AGAINST PWAN GROUP (TEHILIA GARDENS ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, NON-ALLOCATION OF LAND, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦3,800,000

We act as solicitors to the Petitioner, hereinafter referred to as “**our client**”, and on their behalf lodge this formal complaint against **PWAN Group** and its agents who marketed and sold plots at **Tehilia Gardens Estate**, Ibeju Lekki, Lagos State.

FACTUAL SUMMARY

1. In or about [please confirm the year — 2018 or 2019?], our client purchased a residential plot of land at **Tehilia Gardens Estate**, Ibeju Lekki, Lagos State, for a total purchase price of **₦3,800,000**.
2. Acting in good faith and relying on the representations of PWAN Group, our client paid **₦1,500,000** (One Million, Five Hundred Thousand Naira) towards the total cost.

3. Despite repeated demands, there has been **no physical allocation** of any plot, no valid title documents, and no refund of the sums paid.
4. PWAN Group has failed, refused, and neglected to allocate any plot, refund any part of the payment, or offer any reasonable explanation.
5. The deliberate retention of the money without providing land, title, or refund amounts to fraudulent misrepresentation and breach of trust.

CRIMINAL OFFENCES DISCLOSED

The actions of PWAN Group and its agents amount to serious violations of Nigerian criminal and consumer laws:

- **Obtaining by False Pretence / Advance Fee Fraud** – contrary to Section 1(1)(a) & (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006;
- **Criminal Breach of Trust** – contrary to Section 312 of the Criminal Code Act;
- **Conspiracy to Defraud** – contrary to Section 516 of the Criminal Code Act;
- **Fraudulent Concealment and Misrepresentation** – contrary to Section 14 of the Federal Competition and Consumer Protection Act, 2019.

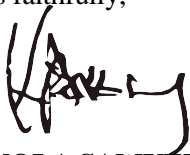
PRAYERS

In light of the above, we respectfully request that your office:

1. **Investigate PWAN Group** and its agents for fraud and obtaining by false pretence.
2. Prosecute all those responsible for the deceitful sale and non-allocation.
3. Recover and refund the sum of **₦1,500,000** paid by our client, or in the alternative, ensure valid allocation of land free from any encumbrance.
4. Award compensation for the loss, hardship, and emotional distress suffered.
5. Take urgent regulatory measures to protect other innocent buyers from falling victim to similar schemes.

Supporting Documentation: Our client is prepared to submit payment receipts, sale agreements, and all communication records to support this petition and aid your investigation.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

Sales Receipt

Sold To:

Mr

Date:

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Installment	057150013 - Zenith Bank Plc	Tehilla Gardens Phase 1	18 Mths

Description	Line Total	
Being installment payment for 1.00 Plot(s) of Land at Tehilla Gardens Phase 1	₦ 550,000.00	
Amount in words: Five Hundred Fifty Thousand Naira and Zero Kobo Only	Subtotal	₦ 550,000.00
	Tax	₦ 0.00
	Total	₦ 550,000.00
Additional Information		
Total Amount: ₦ 1,800,000.00		
Outstanding Balance: ₦ 950,000.00		
Size per Plot: 600 Sqm		

FOR PWAN Homes Ltd:

DADA ANUOLUWAPO



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

Sales Receipt

Sold to:

[REDACTED]

Date:

Receipt #:

File #:

[REDACTED]

Payment Method	Reconciling Bank	Land Location	DURATION		
INITIAL	ZBN	TEHILLA GARDEN 1 Estate	18 MONTHS		
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	600 Sqm	Initial Payment for One (1) plot of land at TEHILLA GARDEN 1 Estate.	300,000.00		300,000.00
		Outstanding Balance	1,500,000.00		



LETTER OF ACKNOWLEDGEMENT

Please find below the description of the Land you are purchasing:

LOCATION: Lepia Community, Lekki Free Trade Zone, Ibeju-Lekki L.G.A, Lagos State.

TITLE: Excision NO (LS/D/BK102). Registered Survey.

TITLE: Excision NO (LS/D/BK102), Registered Survey, Deed of Assignment.

The total cost of the plot as at the date of this payment is **N3, 800,000.00 (Four Million, Six Hundred Thousand Naira)** only, for a Twelve Months Payment Plan.

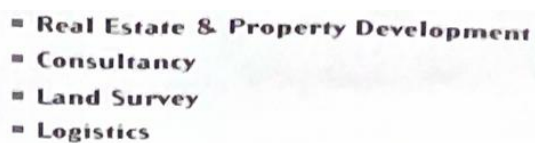
The expected balance is **₦3, 600,000.00** (Three Million, Six Hundred Thousand Naira) Only.

(Note that any default in your payment shall attract extra charges).

Thank you very much for subscribing to **BEACH HAVEN ESTATE** through **PWAN Haven Investments & Realtors Ltd.**

Yours sincerely,


FREDERICK E. OKPAJE (DR.)
Managing Director.



Providing HOME ownership and investment opportunity

SALES RECEIPT

Sold to:

Date:

Receipt #:

File #:

Payment Method		Reconciling Bank	Estate	DURATION
INITIAL		ZENITH BANK	BEACH HAVEN	12MONTHS
ONE (1) RESIDENTIAL PLOT.				
Qty	Size #	Description	Unit Price	Discount
				Line Total
1.00	600 Sqm	Initial Payment for One (1) Residential Plot of Land at BEACH HAVEN ESTATE located at Lepia Community, Ibeju Lekki.	1,000,000.00	1,000,000.00



Emili Ajogwu (Barr)
FOR: PWAN Homes Ltd.