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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 (CEDARWOOD BAY, IBEJU LEKKI) FOR LAND FRAUD, FRAUDULENT MISREPRESENTATION, AND CONSPIRACY TO DEFRAUD – ₦2,500,000 MONETARY LOSS

We write to formally petition PWAN GROUP for engaging in fraudulent land dealings, willful concealment of material facts, and conspiracy to defraud our client through the sale and non-allocation of land in **Cedarwood Bay Estate, Ibeju Lekki, Lagos State**, despite full payment and continued representations.

This case reveals a deliberate pattern of deceit, misrepresentation, and internal conspiracy by PWAN officials and agents to mislead and defraud innocent land purchasers by marketing land already in legal dispute, thereby breaching the trust of investors and causing grievous financial and emotional harm.

DETAILED FACTS OF THE CASE

1. In 2018, our client paid the sum of **₦2,500,000 (Two Million Five Hundred Thousand Naira)** to PWAN Group for the purchase of one (1) plot of land within **Cedarwood Bay Estate, Ibeju Lekki, Lagos State**, based on assurances of clear title and peaceful allocation.
2. The payment was made in full, with the expectation of receiving formal documents and allocation within a reasonable period, as was represented by PWAN's marketing team at the time of sale.
3. Despite this, our client received no allocation, and no official documents confirming ownership were issued. The company continued to promise allocation in due course without delivering any result.
4. In 2024 — **six (6) years after the transaction** — our client was suddenly informed that the land in question was subject to **ongoing litigation** and that **Lagos State had reassigned the land to another family**, rendering the estate inaccessible.
5. These representations were later discovered to be **false**, as no official notice of revocation, court injunction, or legitimate government reassignment was ever issued or communicated at the time of purchase. The lack of

- transparency and refusal to refund the client suggests **embezzlement and criminal intent to defraud**.
6. As of today, the land has not been allocated, no refund has been issued, and PWAN Group has failed, refused, and/or neglected to offer any resolution. The value of the land in Ibeju Lekki is now estimated to be worth **₦15,000,000**, compounding the client's loss and emotional suffering.

APPLICABLE LEGAL BREACHES

The actions and omissions of PWAN Group and its agents constitute serious criminal and civil violations under Nigerian law, including:

- **Advance Fee Fraud** – Section 419 of the Criminal Code: collecting money under false pretenses.
- **Criminal Breach of Trust** – Section 312: failure to apply entrusted funds for the agreed purpose.
- **Fraudulent Misrepresentation** – through deliberate concealment of material land disputes.
- **Conspiracy to Defraud** – Section 516 of the Criminal Code: coordinated deceit involving multiple actors.
- **Unfair Trade Practices** – under Section 14 of the Federal Competition and Consumer Protection Act (FCCPA) 2019.
- **Breach of Contract** – through failure to allocate land or provide valid title documents as agreed.

RELIEFS SOUGHT

Accordingly, we urge the relevant authorities to:

1. Investigate PWAN Group and all agents involved in the Cedarwood Bay transaction for criminal conspiracy and fraud.
2. Order the immediate **refund of ₦2,500,000**, with interest and **compensation for economic and emotional damages**, now exceeding ₦15,000,000 in opportunity cost.
3. Prosecute all individuals and directors of PWAN involved in this transaction under the appropriate provisions of the **Criminal Code** and the **Advance Fee Fraud Act**.
4. Freeze the company's bank accounts and escrow any assets linked to the fraudulent estate.
5. Blacklist PWAN Group and its subsidiaries from further land sales pending full restitution to defrauded clients.

ATTACHED DOCUMENTS (EVIDENCE)

1. Payment receipt(s) totaling ₦2,500,000
2. Any written communication with PWAN officials
3. Estate marketing brochures or sale documents
4. Client's identity and contact information for verification

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

6th February, 2019

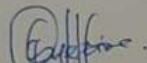
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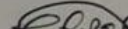
CEDARWOOD BAY SUBSCRIPTION: PLOT ALLOCATION DETAILS

We are pleased to notify you that the One (1) plot of land for which payment has been made by you is lying at **SCHEME C, BLOCK B, PLOT NUMBER 30** in Cedarwood Bay, situated along Eleko/Lekki Road, Ilado Town, Ibeju-Lekki, Lagos State.

The total area of the property is 600sqm.

Thank you for subscribing to Cedarwood Bay, through PWAN PLUS BUSINESS CONCERNS LTD.





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CONTRACT OF SALE

BETWEEN

PWAN PLUS BUSINESS CONCERNS LTD
(THE VENDOR)

AND


(THE PURCHASER)

IN RESPECT OF ONE (1) RESIDENTIAL PLOT OF LAND MEASURING 600 SQM AT
CEDARWOOD BAY SITUATE AT MAGBON TOWN, ALONG ELEKO FREE TRADE
ZONE, LEKKI ROAD, ILADO TOWN, IBEJU-LEKKI LGA, LAGOS.

PREPARED BY: