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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](mailto: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](mailto:info@pwangroup.com), [pwanpronigeria@gmail.com](mailto:pwanpronigeria@gmail.com)

**PETITION AGAINST PWAN GROUP (FOUNTAIN BROOKS ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, CRIMINAL BREACH OF TRUST, OBTAINING BY FALSE PRETENCE, AND CONSPIRACY TO DEFRAUD – ₦600,000**

We act as solicitors to the Petitioner and hereby submit this formal petition against **PWAN Group** and its agents for fraudulent marketing, obtaining by false pretence, and criminal breach of trust in respect of the sale of land at **Fountain Brooks Estate**, Ibeju Lekki, Lagos State.

**FACTUAL BACKGROUND**

1. In or about **2018**, our client entered into a purchase agreement with PWAN Group for a residential plot at **Fountain Brooks Estate**, Ibeju Lekki, at an agreed total price of **₦2,000,000**.
2. Relying on assurances by PWAN's agents that the land was genuine, free from encumbrances, and ready for immediate allocation, our client made an initial payment of **₦600,000**.
3. Despite repeated demands and follow-ups over several years, PWAN Group has failed to allocate any plot, issue title documents, or process a refund.
4. To date, our client remains deprived of the land, the money paid, and any reasonable explanation — resulting in undue financial loss and emotional hardship.

5. This conduct amounts to fraudulent misrepresentation, willful concealment, and a breach of contractual and fiduciary obligations.

### CRIMINAL OFFENCES DISCLOSED

PWAN Group's conduct discloses multiple offences under Nigerian law, including:


- **Obtaining by False Pretence and Advance Fee Fraud** – contrary to the Advance Fee Fraud Act, 2006;
- **Fraudulent Misrepresentation/Concealment** – under the FCCPA, 2019;
- **Criminal Breach of Trust** – under the Criminal Code Act;
- **Conspiracy to Defraud** – under the Criminal Code Act.

### PRAYERS

In view of the foregoing, we respectfully request that your office:

1. Open a criminal investigation against PWAN Group and its responsible officers for fraud and breach of trust;
2. Prosecute those involved for obtaining funds under false pretences;
3. Recover and refund the sum of **₦600,000** to our client forthwith;
4. Compel PWAN Group to cease the marketing of encumbered or non-existent plots;
5. Award reasonable compensation for the severe financial and emotional losses suffered by our client.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the alleged petitioner*



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

Sales Receipt

Sold to:

Date: 26/09/2016

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location	DURATION
OUTRIGHT		ZENITH BANK	FOUNTAIN BROOKS GARDENS	3 MONTHS
RESIDENTIAL PLOT			Unit Price: 2,000,000	
Qty	Size	Description	Amount Paid (N)	Discount
1.00	600sqm	Second Installment for One (1) plot of Land at FOUNTAIN BROOKS GARDENS	400,000.00	
				Line Total
				400,000.00
OUTSTANDING BALANCE			1,400,000.00	

Amount: FOUR HUNDRED THOUSAND NAIRA ONLY

Total Discount

Subtotal 400,000.00  
Sales Tax

Dear Sir,

### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge receipt of your payment of **₦ 200,000 (Two Hundred Thousand Naira)** only, being initial payment for One (1) plot of land measuring 600 square meters at FOUNTAIN BROOKS GARDENS, situate at

Ayinde Village, Korodo, Ibeju - Lekki Local Government Area, Lagos State.

The total cost of your plots being payment by Instalment as at the date of this payment is **₦2,000,000 (Two Million Naira)** only.

The expected balance is **₦ 1,800,000 (One Million Eight Hundred Thousand Naira)** only.

*You are expected to pay the above sum within a period of Three (3) months from the date of your last payment, which is to offset the above balance.*

*Please also **NOTE** that failure to make the above payment within the above stated Three (3) months period automatically converts your payment plan to a Twelve (12) Months Instalment Plan, the effect of which subjects you to a total payment of **₦2,500,000 (Two Million Five Hundred Thousand Naira)** only, payable across twelve (12) months, as against the previous total cost.*

Thank you very much for subscribing to FOUNTAIN BROOKS GARDENS through PWAN PREMIUM Realtors and Concerns Ltd.

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sir,

**NOTICE OF PLOT RESERVATION**

This is to acknowledge that One (1) plot of land have been reserved in your favour with the following details:

**Name:** Mr. Odaro Uyiosa Derek  
**Estate:** FOUNTAIN BROOKS GARDENS  
**Area:** Block D (Residential Block)  
**Plot No:** D262

Please also **NOTE** that the above reservation is subject to physical allocation and full payment for your plot.

Thank you very much for subscribing to **FOUNTAIN BROOKS GARDENS** through PWAN PREMIUM Realtors and Concerns Ltd.



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

Sales Receipt

Sold to:

Date:

Receipt #:

File #:

Payment Method	Reconciling Bank	Land Location	DURATION		
OUTRIGHT	ZENITH BANK	FOUNTAIN BROOKS GARDENS	3 MONTHS		
RESIDENTIAL PLOT		Unit Price: 2,000,000			
Qty	Size #	Description	Amount Paid (N)	Discount	Line Total
1.00	600sqm	Initial Payment for One (1) plot of Land at FOUNTAIN BROOKS GARDENS	200,000.00		200,000.00
OUTSTANDING BALANCE			1,800,000.00		
Amount: TWO HUNDRED THOUSAND NAIRA ONLY			Total Discount	Subtotal	200,000.00
				Sales Tax	
				Total	200,000.00

FOR PWAN PREMIUM REALTORS & CONCERNS LTD:

Signature

