



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](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 (TRINITY GARDENS, PARK ESTATE, AND HAVANNAH GARDENS SCHEME 2) FOR FRAUD, NON-ALLOCATION, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦2,700,000**

We are solicitors to the Petitioner, hereinafter referred to as “*our client*,” and on their behalf, we respectfully submit this formal criminal complaint against PWAN Group, including its relevant subsidiaries **PWAN Edge** and any other entities responsible for the sale and management of **Trinity Gardens, Park Estate, and Havannah Gardens Scheme 2**, all situated within Ibeju-Lekki, Lagos State.

This complaint concerns repeated acts of deception, breach of trust, and unlawful withholding of land despite full payment and the passage of over **seven years**.

## **FACTUAL SUMMARY**

1. In 2017, our client purchased residential plots of land at:

- Trinity Gardens and Park Estate (total purchase sum: ₦1,350,000),
  - Havannah Gardens Scheme 2 (purchase sum: ₦1,350,000),  
bringing the combined total land purchase to **₦2,700,000** (Two Million, Seven Hundred Thousand Naira).
2. In addition to the purchase price, our client also paid all required ancillary fees, including:
    - Land survey fees,
    - Corner piece demarcation fees, and
    - Deeds of assignment and documentation charges.
  3. Despite full and timely payment of all sums and repeated follow-ups since 2017, PWAN Group has failed to carry out any physical allocation of land or provide valid land documentation to our client.
  4. The company's representatives have continued to issue empty promises of new allocation dates but have failed to honour them. Some officers have become unreachable and unresponsive to calls or formal written communication.
  5. The continued non-allocation, now spanning over **seven years**, has caused our client significant financial loss, emotional distress, and denied them the benefit of their lawfully acquired investment.

## CRIMINAL OFFENCES DISCLOSED

The actions of PWAN Group and its relevant subsidiaries constitute multiple criminal breaches under Nigerian law, including:

- **Advance Fee Fraud and Obtaining by False Pretence** – 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;
- **Unfair Business Conduct and Misrepresentation** – contrary to Section 14 of the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- **Cheating** – contrary to Section 421 of the Penal Code (where applicable).

## PRAYERS

In view of the foregoing, we respectfully seek the following reliefs:

1. That your office immediately commence a full criminal investigation into the actions of PWAN Group and the officers involved.
2. That prosecution be initiated against any individuals found culpable for fraud, misrepresentation, and breach of trust.
3. That PWAN Group be compelled to either:
  - Allocate the purchased plots at Trinity Gardens, Park Estate, and Havannah Gardens Scheme 2 to our client without further delay; **or**
  - Refund the total sum of ₦2,700,000 plus all additional payments for survey, corner piece, and deeds of assignment, together with applicable interest and fair compensation.
4. That the company be ordered to pay compensation to our client for financial hardship, emotional distress, and the prolonged deprivation of their property rights.

5. That relevant regulatory and enforcement agencies place strict monitoring on PWAN Group's future land sales and block any new unallocated land offerings until all outstanding obligations to existing buyers have been fully met.

We are ready to provide all supporting documentation including payment receipts, transaction records, correspondence, and sworn affidavits and shall cooperate fully with your office during investigation and enforcement.

Thank you for your urgent attention to this complaint.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Akinola Samuel Eluyefa', written in a cursive, stylized script.

**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the alleged petitioner*



📍 Floor 1 - 5 Puri Mall Building, Km 25, Lekki Epe Expressway  
Opposite Leawood Hotel (See Centre)  
Oko Ado, Ajah, Lagos State  
☎ +234-1-2956848, 234-14534177, 234-14533664

DATE: 6TH MARCH, 2020  
FILE #: PH/TGP2/2015/00014



Dear Valued Client,

**PHYSICAL ALLOCATION NOTIFICATION**

You are hereby notified of your allocation as follows:

<b>Estate Name:</b>	TRINITY GARDENS & PARK ESTATE 2
<b>No of Plots:</b>	1 PLOT (RESIDENTIAL)
<b>Plot Details:</b>	BLOCK G2 PLOT 22
<b>Plot Size:</b>	675 SQMS
<b>Date of Allocation:</b>	6TH MARCH, 2020

NB: This letter is temporary pending the receipt of your survey plan.  
Subsequently, you are responsible for the clearing of your land after allocation.

Thanking you for choosing PWAN HOMES LIMITED.

Yours faithfully,



**GTCO**

Guaranty Trust Nigeria

### Transaction Receipt

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**Transaction Date:** 09 May 2022, 09:31 GMT+1

**Reference Number:** 422/73875/09May2022\_09052022

**Sender:** OGBEBOR RAYMOND AIGBE

**Transaction Amount:** 180,000NGN

**Amount In Words:** One Hundred and Eighty Thousand Naira Only.

**Transaction Type:** GTB-ThirdParty Transfer

**Receiver:** PWAN HOMES LTD

**Account Number:** 0141941056

**Receiving Bank:** GUARANTY TRUST BANK

**Remarks:** TRANSFER BETWEEN CUSTOMERS Via GTWorld PARK SURVEY, DEMARCATION, AND DEED OF ASSIGNMENT. RAYMOND OGBEBOR. TRINITY GARDENS AND PARK ESTATE 2 REF:422457607000001800002205091326 from OGBEBOR RAYMOND AIGBE to PWAN HOMES LTD

#### DISCLAIMER

Your transfer has been successful and the beneficiary's account will be credited. However, this does not serve as confirmation of credit into the beneficiary's account. Due to the nature of the Internet, transactions may be subject to interruption, transmission blackout, delayed transmission and incorrect data transmission. The Bank is not liable for



**HEAD OFFICE** Floor 1 to 5 PUR Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos  
**IKEJA OFFICE** 16A Sule Abulka Close, Off Opeti Road by GTB, Opeti, Ikeja, Lagos  
Tel: +234-12956848, +234-14533669  
Email: info@pwanhomes.com

## Sales Receipt

Sold To:

Mr

Date:

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Outright	011152303 - First Bank of Nigeria Plc	Trinity Gardens & Park Estate 2	

Description	Line Total	
Being full payment for 1.00 Plot(s) of [TGP 2] Land at Trinity Gardens & Park Estate 2	N 1,350,000.00	
Amount in words: One Million, Three Hundred Fifty Thousand Naira and Zero Kobo Only	Subtotal	N 1,350,000.00
	Tax	N 0.00
	Total	N 1,350,000.00

### Additional Information

Total Amount: N 1,350,000.00  
Outstanding Balance: N 0.00  
Size per Plot: 600 sqm  
Discount: 10.0%

FOR PWAN Homes Ltd:

SHITTU FIOLA

Signature



# SALES RECEIPT

TO

RECEIPT NO.  
DATE.  
CUSTOMER ID.

PAYMENT METHOD	RECONCILING BANK	AMOUNT PAID	OUTSTANDING BALANCE
3 MONTH PAYMENT	PE-ZENITHBANK(PROJECT)	160,000.00	NIL

[illegible]

AMOUNT IN WORDS:

ONE HUNDRE AND SIXTY THOUSAND NAIRA ONLY

TOTAL DISCOUNT

SUBTOTAL

**SALES TAX**

**TOTAL**

160.000.00

160,000.00

**THANK YOU FOR YOUR PATRONAGE!**

2nd Floor, KM 46 Lekki Epe Expressway, Alfa B/stop, Opposite Children's Plaza, Sango, Lagos. 01-2931400

12/9/2017





CONFIDENTIAL

AA 9556380

TERMS AND CONDITIONS APPLY

Date: 

D	D	M	M	Y	Y	Y	Y

Branch: 

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**LOCAL CURRENCY FUNDS TRANSFER**

M315888

**TYPE OF TRANSFER**

☐ Other Bank Transfer (Instant) ☐ Other Bank Transfer (Received Within 24hrs) ☒ Internal Funds Transfer ☐ Standing Order Transfers

\* I hereby acknowledge that network unavailability may result in a failed instant transfer and that a failed instant transfer initiated before 2 pm will be reversed within 24 hours from the time such transfer is initiated, while failed instant transfers initiated after 2pm will be reversed within 48 hours from the time such transfer is initiated (Mondays - Fridays only).

The bank is hereby authorized to transfer as follows:

**DEBIT DETAILS (CUSTOMER)**

Customer Name: [REDACTED]

Account Number: 0055655780 Amount (in words) / Instruction: One million three

hundred and forty thousand Naira Only

₦ 1,350,000

**FREQUENCY (FOR STANDING ORDER ONLY)**

☐ Daily ☐ Weekly ☐ Monthly ☐ Quarterly ☐ Half Yearly

Start Date: 

D	D	M	M	Y	Y	Y	Y

End Date: 

D	D	M	M	Y	Y	Y	Y

**CREDIT DETAILS (BENEFICIARY)**

Beneficiary Name: Pwani Home Limited

Account Number: 0001000000

Bank: First Bank

Transaction Details: ₦ 1,350,000

Beneficiary Name:

Account Number:

Bank:

Transaction Details:





RECEIPT NO.  
DATE.  
CUSTOMER ID.

[illegible]

**THANK YOU FOR YOUR PATRONAGE!**



Dear Sir;

**ALLOCATION OF PLOT OF LAND AT HAVILLA GARDENS 2, ELERANIGBE, IBEJU LEKKI LGA**

Congratulations Sir! This is to inform you that Two (2) plots of land has been allocated to you in **Havilla Gardens Scheme 2**, being one of the Real Estate Schemes of Pwan Edge Properties & Investment Ltd, to which you subscribed. However, the physical allocation of plot(s) will commence from November 2017.

Please find the description of the Allocation below:

- **LOCATION:** Eleranigbe Ibeju Lekki Area of Lagos State.
- **SIZE:** Two (2) plots of undeveloped land measuring 600sqm.
- **STATUS:** Undeveloped parcel of Land presently going through the process of excision in Ministry of Lands, Alausa, Lagos State.
- **ALLOCATION DATE:** From November, 2017

Kindly pay the sum of ₦50, 000 per plot for the **Provisional Survey Plan** in your name and ₦20, 000 per plot for **Plot Demarcation Fee** (4 Corner Piece) into our Zenith Bank Account. Account Name: **Pwan Edge Properties and Investment Limited (Projects)** & Account Number: **1014747262**.

After payment, a copy of your Provisional Survey Plan with the full details of your plot will be made available to you on or before the physical allocation of plot.

We would advise you on the cost for production of your Deed of Assignment at a later date.

Thank you very much for your patronage.

Sincerely,

## GTBank ONLINE TRANSFER ADVICE



Guaranty Trust Bank plc  
RC 153329

Transaction Date: 09-Sep-2018

GTBank

Reference Number: 422/8046871/10Sep2018\_09092

Transaction Type: NIP Transfer

Sender: [REDACTED]

Receiver: PWAN EDGE PROPERTIES AND

Account Number: 0033264810

Account Number: 1014747262

Transaction Amount : NGN 160,000.00

Receiving Bank: ZENITH BANK PLC

Amount In words: One Hundred and Sixty Thousand Naira Only.

NIBSS Instant Payment Outward 000013180909162342000165319268

Remarks: Plotallocationandphysicallayoutpwanedge TO ZBN/PWAN EDGE PROPERTIES AND INVESTMENT LTD (PROJECTS) /52.5/REF:00001318090916234200016531926

### Disclaimer

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