



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 (BEACH HAVEN ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, CRIMINAL BREACH OF TRUST, OBTAINING BY FALSE PRETENCE, AND CONSPIRACY TO DEFRAUD – ₦2,100,000

We act as solicitors to the Petitioner and on their behalf lodge this formal complaint against **PWAN Group** and its agents responsible for marketing and selling plots at **Beach Haven Estate**, Ibeju Lekki, Lagos State, for engaging in fraudulent land sales, concealment of material facts, and criminal breach of trust.

FACTUAL BACKGROUND

1. In or about **2020**, our client entered into an agreement with PWAN Group to purchase a residential plot of land at **Beach Haven Estate**, Ibeju Lekki, Lagos State, at an agreed price of **₦3,450,000**.
2. Acting in good faith and relying on the representations of PWAN's agents that the land was genuine, available, and free from encumbrances, our client paid a total sum of **₦2,100,000**, leaving a balance of **₦1,350,000**.

3. Despite multiple demands and follow-ups since 2020, PWAN Group has failed to:
 - Allocate any physical plot;
 - Issue title documents or allocation papers;
 - Refund the sums already paid; or
 - Provide any valid explanation for its failure to fulfil its obligations.
4. The continued retention of our client's funds without allocation or refund amounts to deliberate deception, fraudulent misrepresentation, and a criminal breach of trust.

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.

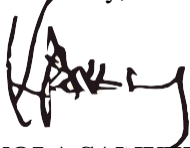
PRAYERS

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

1. Open a criminal investigation against PWAN Group and its responsible officers for fraud and concealment;
2. Prosecute the parties responsible for obtaining money by false pretence;
3. Recover and refund the total sum of **₦2,100,000** to our client immediately;
4. Award appropriate compensation for the financial losses and emotional hardship suffered by our client;
5. Compel PWAN Group to desist from marketing encumbered or non-existent estates to unsuspecting buyers.

Supporting evidence: Payment receipts, agreements, and all communication records are ready for submission to support this petition.

Yours faithfully,




AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner


Sir,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦700,000.00** (Seven Hundred Thousand Naira) Only, being part-payment for **One (1) Residential Plot** measuring **450sqm** of land each, in **BEACH HAVEN ESTATE** situated at **Lepia Community, Lekki Free Trade Zone, Ibeju-Lekki L.G.A, Lagos State.**

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.

TYPE/SIZE: One (1) Residential Plot of undeveloped parcel of land measuring 450sqm each.

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

The total cost of the One plot as at the date of this payment is **₦3, 450,000.00** (Three Million, Four Hundred & Fifty Thousand Naira) only, for a Twelve Months Payment Plan.

The expected balance is **₦ 2,750,000.00** (Two Million, Seven Hundred & Fifty 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 & Real Estate Ltd**

ownership and investment opportunity

SALES RECEIPT

Sold to:

[REDACTED]

Date:

[REDACTED]

Receipt #:

[REDACTED]

File #:

[REDACTED]

Payment Method		Reconciling Bank	Estate	DURATION	
INITIAL		GT BANK	BEACH HAVEN	12MONTHS	
ONE (1) RESIDENTIAL PLOT.					
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	450 Sqm	Initial Payment for One (1) Residential Plot of Land at BEACH HAVEN ESTATE located at Lepia Community, Ibeju Lekki.	700,000.00		700,000.00
		Outstanding Balance			
		2,750,000.00			



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

Providing HOME ownership and investment opportunity

SALES RECEIPT

Sold to:

[REDACTED]

Date:

[REDACTED]

Receipt #:

[REDACTED]

File #:

[REDACTED]

Payment Method		Reconciling Bank	Estate	DURATION	
INSTALMENT		GT BANK	BEACH HAVEN	12MONTHS	
ONE (1) RESIDENTIAL PLOT.					
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	450 Sqm	Further Payment for One (1) Residential Plot of Land at BEACH HAVEN ESTATE located at Lepia Community, Ibeju Lekki.	600,000.00		600,000.00
Outstanding Balance					



HEAD OFFICE: No 10, Road 7 Lekki County Homes, Ikota Villa Estate,
Lekki Epe Expressway, Lagos State.
WARRI OFFICE: 90, Refinery Road Ekpan, Warri, Delta State.
Tel: (+234) 014535821.
Email: pwanhaven@gmail.com

Sales Receipt

Sold To:

[REDACTED]

Date:

[REDACTED]

Receipt #:

[REDACTED]

File #:

[REDACTED]

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Installment	Guaranty Trust Bank	1	Beach Haven Estate	12Mths

Description	Line Total	
Being Further Payment for One (1) Residential Plot of Land at BEACH HAVEN ESTATE located at Lepia Community, Ibeju Lekki.	N 800,000.00	
Amount in words: Eight Hundred Thousand Naira and Zero Kobo	Subtotal	N 800,000.00
	Tax	N 0.00
	Total	N 800,000.00

Additional Information

Total Amount: N 3,450,000.00
Outstanding Balance: N 1,350,000.00
Size per Plot: 450Sqm

FOR PWAN Haven Ltd:

Okesanya Michael