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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 (SUNSHINE CITY ESTATE, IBUSA) FOR FRAUD, CRIMINAL BREACH OF TRUST, CONSPIRACY TO DEFRAUD, AND OBSTRUCTION – ₦630,000

We are solicitors to the Petitioner, hereinafter referred to as “our client”, and on their behalf, we write to formally lodge this criminal complaint against **PWAN Group** and its officers involved in the management and marketing of **Sunshine City Estate, Ibusa, Delta State**, for acts amounting to **fraud, criminal breach of trust, conspiracy to defraud, and willful obstruction**.

FACTUAL SUMMARY

1. In 2018, our client was introduced to the PWAN Sunshine City Estate, Ibusa, through an estate agent acting under the instruction of PWAN Group. Relying on representations made by the company and its agents, our client proceeded to make **full payment in the sum of ₦630,000** for one (1) plot of land in the said estate.
2. PWAN Group assured our client of allocation upon full payment. However, when the promised allocation period approached, the company **failed to deliver**, offering **varying and unsubstantiated excuses**.
3. Our client contacted the then project manager, who claimed to have resigned and directed her to the company’s office in Asaba. There, she was referred to a new manager who, after listening to her complaints, provided the contact of the purported head of allocations.
4. Our client contacted the said head in 2022, and he promised to visit Asaba over the weekend. Unfortunately, from that point onward, he **ceased answering her calls and deliberately ignored all further communications** via WhatsApp.
5. Repeated physical visits to the company’s Asaba office have proven futile, as our client has been **consistently denied audience with the company’s senior officers** by the secretary and other staff.

6. Despite having collected and retained the sum of ₦630,000 from our client since 2018, PWAN Group has **neither effected allocation nor refunded her money**, thereby causing her severe emotional, financial, and psychological distress.

CRIMINAL OFFENCES DISCLOSED

The acts and omissions of PWAN Group and its representatives constitute the following criminal offences under Nigerian law:

- **Advance Fee Fraud and Obtaining by False Pretence** – contrary to Section 1(1)(a) and (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;
- **Cheating** – contrary to Section 421 of the Penal Code (if applicable);
- **Obstruction of Justice and Suppression of Evidence** – by refusing access to company officials and failing to communicate truthfully.

PRAYERS

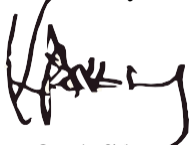
On behalf of our client, we humbly request that your esteemed office:

1. **Launch an immediate criminal investigation** into this case;
2. **Prosecute all culpable parties**, including any agents, managers, or directors involved in the scheme;
3. **Recover and restitute the total sum of ₦630,000** paid by our client or ensure immediate allocation of the promised land;
4. **Compel PWAN Group to compensate our client** for the prolonged emotional and financial trauma caused by this deceit and betrayal;
5. **Take regulatory or prosecutorial action** to prevent recurrence and hold the company accountable for similar complaints by other victims.

We are prepared to furnish your office with all relevant documents, including payment receipts, communications, and sworn affidavits, and will fully cooperate in your investigation.

Thank you for your anticipated action.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

