### **ELUYEFA CHAMBERS**

No. 22 Admiralty Way, Lekki Phase 1



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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 FOR FRAUDULENT TRANSFER OF DEED, ISSUANCE OF FAKE SURVEY ON GOVERNMENT ACQUIRED LAND, NON-ALLOCATION, AND REPEATED DECEPTION

We write to formally lodge a **criminal complaint** against **PWAN Group**, its officers, and its agents for **persistent fraud, criminal breach of trust, conspiracy to defraud**, and repeated misrepresentation, which has resulted in prolonged financial loss, emotional distress, and violation of our client's fundamental consumer rights.

#### **FACTUAL SUMMARY**

- In **2018**, the complainant acquired a plot of land originally bought by a friend who needed to relocate abroad for studies.
- The plot was transferred through **PWAN Group** by a **Deed of Assignment**, with the complainant paying the agreed sum to perfect the title into their own name this process involved multiple interactions and back-and-forth confirmations with PWAN staff.
- Despite repeated promises, **PWAN failed to arrange any site visit** for the complainant to physically see the land for years, giving shifting excuses and delays.
- Following their return to Nigeria in **2024**, the complainant personally took the survey document issued by PWAN to the **Lagos State Surveyor General's Office at Alausa** for verification the result confirmed that the land was under **government acquisition** and therefore invalid for private ownership.
- When confronted, PWAN initially tried to deny this fact until the Surveyor General's Office was called directly to confirm. Only then did PWAN reluctantly agree to allocate a replacement plot.

- However, the new land they offered turned out to be **unsuitable**, **partially waterlogged**, **and similarly suspicious**, showing clear signs of not being genuine or properly excised for private development.
- The complainant has since worked with **three different PWAN managers** over several years each promising resolution but providing none.
- Multiple calls to the **owner and principal officer** of PWAN were made. The first time he claimed ignorance, but subsequently he has **refused to pick calls** or respond, showing clear intent to evade accountability.
- The complainant remains without valid land, despite paying for the land, transfer, survey plan, and demarcation, and having verified that all lands shown so far are either government-acquired or unsuitable.

#### **ALLEGED OFFENSES**

The conduct of PWAN Group in this matter constitutes the following offenses under Nigerian law:

- 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, Cap C38, LFN 2004:
- Forgery and Issuance of False Documents contrary to Section 467 of the Criminal Code Act;
- Conspiracy to Defraud contrary to Section 516 of the Criminal Code Act;
- Violation of the Federal Competition and Consumer Protection Act (FCCPA), 2019 through repeated misrepresentation and unfair practices;
- Misuse of Land under Government Acquisition contrary to the Land Use Act and relevant state property laws.

#### **RELIEFS SOUGHT**

In view of these grave infractions, we respectfully request that your esteemed office:

- 1. Launch a **full-scale criminal investigation** into **PWAN Group**, its owners, officers, and field agents who facilitated this fraudulent transfer, fake survey, and non-allocation.
- 2. Forensically review the **validity of all land titles marketed by PWAN**, especially those under **government acquisition or unsuitable for residential use**.
- 3. Freeze all relevant **company and director accounts** to prevent further fraudulent transactions.
- 4. Prosecute all persons found culpable for fraud, misrepresentation, forgery, and conspiracy.
- 5. Compel PWAN Group to either:
  - o **Provide valid, excised, and developable land** in a suitable location with verified documentation; or
  - Refund the total sum paid, with accrued interest, plus additional compensation for the
    cost of independent verification and the years of stress and hardship endured by the
    complainant.
- 6. Impose sanctions and recommend regulatory measures to protect the public from further land scams by PWAN Group or its related subsidiaries.

#### ATTACHED DOCUMENTS

• Copies of the **Deed of Assignment**, sales receipts, survey plans, and demarcation receipts;

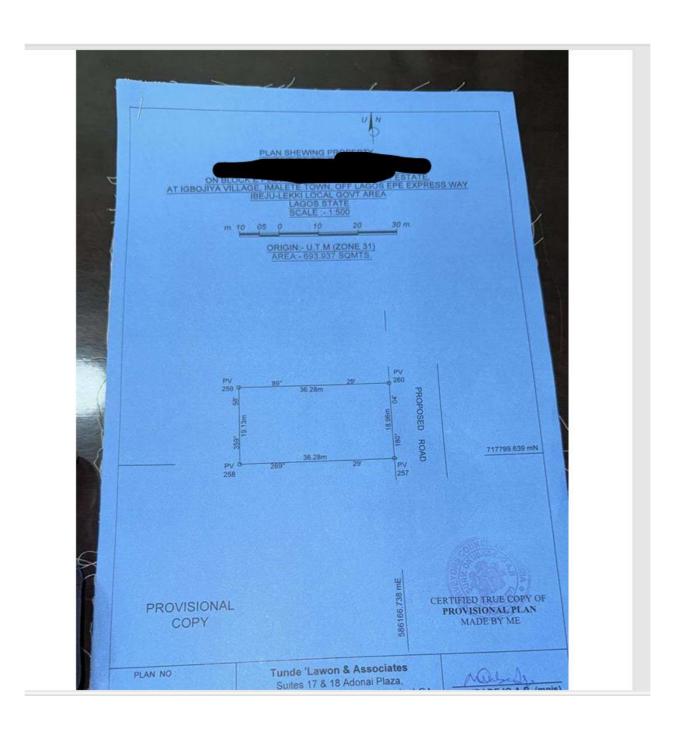
Yours faithfully,

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 Centro)
   Oko Ado, Ajah, Lagos State
   (\$\infty\$ +234-1-2956848, 234-1453177, 234-14533664

DATE: FILE #:





Dear Valued Client,

## PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

LEKKI VILLAS PHASE 1 Estate Name:

1 (RESIDENTIAL) No of Plot(s):

BLOCK E, PLOT 17 Plot Details:

675 SQMS Plot Size:

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,

