



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 (FOUNTAIN BROOKS ESTATE, IBEJU LEKKI, LAGOS) FOR FRAUD, UNFAIR TRADE PRACTICES, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦950,000**

We act as solicitors to the Petitioner, hereinafter referred to as “our client”, and on their behalf, we write to lodge this formal complaint against PWAN Group and its agents responsible for the marketing and sale of plots at Fountain Brooks Estate, Ibeju Lekki, Lagos State, for engaging in deceitful conduct that amounts to fraud, misrepresentation, and breach of trust.

**FACTUAL SUMMARY**

1. In or around January 2018, our client purchased a residential plot of land at Fountain Brooks Estate, Ibeju Lekki, Lagos State, which was marketed and sold by agents and representatives of the PWAN Group.

2. Pursuant to the purchase, our client paid the initial sum of ₦245,000 (Two Hundred and Forty-Five Thousand Naira) and subsequently made an additional payment of ₦705,000 (Seven Hundred and Five Thousand Naira), amounting to a total of ₦950,000 (Nine Hundred and Fifty Thousand Naira) out of the agreed total cost of ₦2,200,000 (Two Million Two Hundred Thousand Naira).
3. At the time of sale, PWAN Group and its agents made express representations that the land was free from any form of encumbrance and that physical allocation would be carried out promptly upon payment.
4. Despite repeated assurances and several follow-ups by our client spanning over seven (7) years, PWAN Group has failed, neglected, and refused to carry out any physical allocation of the land or provide possession to our client.
5. Till date, no tangible steps have been taken by PWAN Group to allocate the plot or provide any credible explanation for its failure to fulfill its contractual and statutory obligations.
6. Our client has also not been offered any valid replacement plot, refund of the ₦950,000 paid, or compensation for the continuous breach and deprivation of property use.
7. PWAN Group has failed to disclose any encumbrance, administrative bottlenecks, or legal impediments that have allegedly hindered the allocation process. The continued withholding of the sums paid by our client, without allocating any land, amounts to a deliberate breach of trust and an unlawful conversion of funds for personal or corporate gain.
8. Our client reasonably relied on the representations and marketing promises of PWAN Group and its agents, which have turned out to be false, misleading, and intended to fraudulently obtain funds under the guise of a legitimate real estate transaction.

## **CRIMINAL OFFENCES DISCLOSED**

The conduct of PWAN Group and its officers amounts to multiple violations of Nigerian law, including but not limited to:

- Obtaining by False Pretence and Advance Fee Fraud – 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;
- Fraudulent Misrepresentation and Unfair Trade Practices – contrary to Section 14 and other relevant provisions of the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- Unlawful Conversion and Deprivation of Property Use.

## **PRAYERS**

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

1. Initiate a comprehensive criminal investigation into PWAN Group, its promoters, directors, and agents responsible for the fraudulent sale and non-allocation of plots at Fountain Brooks Estate, Ibeju Lekki, Lagos;
2. Prosecute all persons found culpable for obtaining money under false pretence, criminal breach of trust, and conspiracy to defraud;

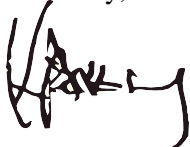
3. Recover and refund the total sum of ₦950,000 paid by our client, or in the alternative, compel PWAN Group to immediately allocate a valid and unencumbered plot of land to our client at Fountain Brooks Estate or any equivalent estate within the Ibeju Lekki axis;
4. Direct PWAN Group to provide full disclosure of the status of Fountain Brooks Estate, including any encumbrances, disputes, or government restrictions affecting its development;
5. Award appropriate damages to our client for the financial loss, emotional trauma, and stress suffered due to the prolonged non-performance and deception;
6. Take regulatory and prosecutorial measures to restrain PWAN Group from further selling or advertising plots in Fountain Brooks Estate without first resolving all outstanding obligations to existing buyers;
7. Ensure that restitution is made to all other affected buyers similarly defrauded by the actions and omissions of PWAN Group and its affiliates.

Our client is prepared to furnish your office with all relevant documents, including payment receipts, correspondence, and other material evidence to aid your investigation and prosecution.

We urge your prompt intervention to protect innocent buyers from continued exploitation and to bring the perpetrators to justice.

Thank you for your anticipated cooperation.

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

Sold to:

[REDACTED]

Sales Receipt

Date:

Receipt #:

File #:

[REDACTED]

[REDACTED]

[REDACTED]

Payment Method		Reconciling Bank	Land Location		DURATION
INSTALLMENT		ZENITH BANK	FOUNTAIN BROOKS GARDENS		6 MONTHS
RESIDENTIAL PLOT			Unit Price:	2,200,000	
Qty	Size #	Description	Amount Paid (N)	Discount	Line Total
1.00	600sqm	Initial Payment for One (1) plot of Land at FOUNTAIN BROOKS GARDENS	245,000.00		245,000.00
OUTSTANDING BALANCE			1,955,000.00		



**PWAN PREMIUM**  
REALTORS & CONCERNS

[REDACTED]

Dear Madam,

#### 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: Mrs. Almaroof Fatimah Shalewa  
Estate: FOUNTAIN BROOKS GARDENS  
Area: Block D (Residential Block)  
Plot No: D201

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



**PWAN PREMIUM  
REALTORS & CONCERNS**

Dear Madam

**LETTER OF ACKNOWLEDGEMENT**

This is to acknowledge receipt of your payment of **₦ 245,000 (Two Hundred and Forty Five Thousand Naira)** only, being initial payment for one (1) plot of land measuring 600 square meters in FOUNTAIN BROOKS GARDENS, situate at Ayinde Village, Korodo, Ibeju - Lekki Local Government Area, Lagos State.

The total cost of your plots as at the date of this payment is **₦2, 200, 000 (Two Million Two Hundred Thousand Naira)** only.

The expected balance is **₦ 1, 955, 000 (One Million Nine Hundred and Fifty Five Thousand Naira)** only.

You are expected to pay the above sum within a period of Six (6) 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 Six (6) 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.

Yours faithfully,

**PWAN PREMIUM REALTORS AND CONCERNS LTD.**

  
**Mr. David Adidi**  
Admin Officer

**Contact Address:**

Plot 18, Udo Wogu Drive, Chevy View Estate off Chevron Drive Lekki, Lagos.

**Tel:** 081 8000 0900, 081 8000 0467

**Web:** [www.pwanpremium.com](http://www.pwanpremium.com)

**Email:** [pwanpremium@gmail.com](mailto:pwanpremium@gmail.com), [customerservice@pwanpremium.com](mailto:customerservice@pwanpremium.com)



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

Sales Receipt

Sold to: [REDACTED]

Date: [REDACTED]

Receipt #: [REDACTED]

File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	DURATION		
INSTALLMENT	ZENITH BANK	FOUNTAIN BROOKS GARDENS	6 MONTHS		
RESIDENTIAL PLOT		Unit Price: 2,200,000			
Qty	Size :	Description	Amount Paid (N)	Discount	Line Total
1.00	600sqm	Second Installment for One (1) plot of Land at FOUNTAIN BROOKS GARDENS	705,000.00		705,000.00
OUTSTANDING BALANCE					
			1,250,000.00		

Amount: SEVEN HUNDRED AND FIVE THOUSAND NAIRA ONLY

Total Discount

Subtotal 705,000.00

Sales Tax

Total 705,000.00

FOR PWAN PREMIUM REALTORS & CONCERNS LTD:

Signature

Received By:

Signature

