 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

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 (TEHILIA GARDENS, IBEJU LEKKI, LAGOS) FOR
FRAUD, CRIMINAL BREACH OF TRUST, UNLAWFUL RETENTION OF FUNDS, AND
CONSPIRACY TO DEFRAUD – ₦900,000**

We act as solicitors to the Petitioner, hereinafter referred to as “**our client**”, and on their behalf, we submit this formal complaint against PWAN Group and its agents for engaging in fraudulent real estate practices, misrepresentation, criminal breach of trust, and unlawful retention of our client’s funds in connection with the sale of plots at **Tehilia Gardens Estate**, Ibeju Lekki, Lagos State.

FACTUAL SUMMARY

1. In or around 2016, our client entered into a contract to purchase one (1) plot of land at Tehilia Gardens Estate, Ibeju Lekki, Lagos State, as marketed and promoted by PWAN Group and its accredited agents.

2. The total purchase price for the plot was agreed at **₦1,800,000** (One Million Eight Hundred Thousand Naira).
3. Acting in good faith and relying on the representations and marketing assurances of PWAN Group that the land was genuine, available, and free from encumbrances, our client made substantial part payments amounting to **₦1,300,000** (One Million Three Hundred Thousand Naira), leaving a balance of **₦500,000**.
4. Despite repeated follow-ups and the substantial amount already paid, PWAN Group has failed, refused, and neglected to:
 - Effect physical allocation of the purchased plot;
 - Provide title documentation;
 - Refund the paid sum; or
 - Offer any reasonable explanation for its continued unlawful retention of the funds.
5. Numerous attempts by our client to reach an amicable resolution have been ignored or met with vague promises that have never materialized.
6. PWAN Group's failure to allocate the land or refund the money constitutes fraudulent misrepresentation, a breach of contract, criminal breach of trust, and an outright conspiracy to defraud our client.
7. The prolonged retention of the purchase funds without value has caused our client severe financial hardship, anxiety, and emotional distress.

CRIMINAL OFFENCES DISCLOSED

The acts and omissions of PWAN Group and its officers amount to serious offences under 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 Deceptive Marketing** – contrary to Section 14 of the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- **Unlawful Retention and Conversion of Property** – contrary to relevant provisions of the Criminal Code.

PRAYERS


In view of the above, we respectfully urge your office to:

1. Initiate a thorough criminal investigation into the actions of PWAN Group and its officers concerning the fraudulent sale of plots at Tehilia Gardens Estate.
2. Prosecute all individuals found responsible for the misrepresentation, deceit, and unlawful diversion of our client's funds.
3. Compel PWAN Group to refund the sum of **₦900,000** immediately to our client, or in the alternative, allocate a valid, encumbrance-free replacement plot of equal value.
4. Compel full disclosure on the true status of Tehilia Gardens Estate to protect other unsuspecting buyers from similar fraudulent conduct.

5. Award fair compensation to our client for the financial losses, emotional trauma, and hardship suffered as a result of PWAN Group's actions.
6. Take all necessary regulatory and prosecutorial measures to prevent PWAN Group and its agents from further fraudulent marketing and unlawful retention of customer funds.

Our client stands ready to provide all supporting documentation, including receipts, payment evidence, agreements, and communication records, and will fully cooperate with your investigation to ensure that justice is done.

Yours faithfully,

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

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦200, 000 (Two Hundred Thousand Naira)** only being part- payment for One (1) plot measuring **600sqm** of land each, in **TEHILLA GARDENS ESTATE**, along Akodo Road, Ibeju Lekki Local Government Area of Lagos State.

The total cost of the plot as at the date of this payment is ~~N1~~, 800,000 (One Million, Eight Hundred Thousand Naira) only, for the Eighteen months scheme.

The expected balance is **₦1,600,000 (One Million, Six Hundred Thousand Naira)** only.

You are expected to pay **₦88, 889 (Eighty-Eight Thousand, Eighty Hundred and Eighty-Nine Naira)** only, before the end of every month, starting from the month of April, 2016 which is to offset the remaining balance of **₦1, 600,000 (One Million, Six Hundred Thousand Naira)** only.

Please go through the attached Frequently Asked Questions leaflet for more information.

Thank you very much for subscribing to **TEHILLA GARDENS ESTATE** through **PWAN Homes Ltd.**

Yours/sincerely,



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

Sales Receipt

Sold To:

[REDACTED]

Date:

[REDACTED]

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Tehilla Gardens Phase 1	18Mths

Description	Line Total	
Being installment payment for 1 Plot(s) of Land at Tehilla Gardens Phase 1	₦ 750,000.00	
Amount in words: Seven Hundred Fifty Thousand Naira and Zero Kobo Only	Subtotal	₦ 750,000.00
	Tax	₦ 0.00
	Total	₦ 750,000.00

Additional Information

Total Amount: ₦ 1,800,000.00
Outstanding Balance: ₦ 560,700.00
Plot Size: 600 Sqm



- 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		
INITIAL	ZENITH BANK PLC	TEHILLA GARDEN 1 Estate	18 MONTHS		
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	600 Sqm	Initial Installment Payment for One (1) plot of land at TEHILLA GARDEN 1 Estate.	200,000.00		200,000.00
		Outstanding Balance	1,600,000.00		



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

Sales Receipt

Sold to: [REDACTED]
[REDACTED]
[REDACTED]

Date: [REDACTED]
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method		Reconciling Bank	Land Location		DURATION
INSTALLMENT		ZENITH BANK PLC	TEHILLA GARDEN 1 Estate		18 MONTHS
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	600 Sqm	Further Installment Payment for One (1) plot of land at TEHILLA GARDEN 1 Estate.	100,000.00		100,000.00
Outstanding Balance			1,500,000.00		



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

Sales Receipt

Sold to:

[REDACTED]

Date:

June 20, 2015

Receipt #:

10003

File #:

[REDACTED]

Payment Method		Reconciling Bank	Land Location		DURATION
INSTALLMENT		ZENITH BANK PLC	TEHILLA GARDEN 1 Estate		18 MONTHS
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	600 Sqm	Further Installment Payment for One (1) plot of land at TEHILLA GARDEN 1 Estate.	83,300.00		83,300.00
Outstanding Balance			1,416,700.00		



**PWAN
HOMES**
...making home ownership dreams a reality

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

Sold to:

[REDACTED]
[REDACTED]
[REDACTED]

Sales Receipt

Date: [REDACTED]
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	DURATION		
INSTALLMENT	ZENITH BANK PLC	TEHILLA GARDEN 1 Estate	18 MONTHS		
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	600 Sqm	Further Installment Payment for One (1) plot of land at TEHILLA GARDEN 1 Estate.	6,000.00		6,000.00
		Outstanding Balance	1,310,700.00		
Amount in words: Six Thousand Naira Only			Total Discount	Subtotal	6,000.00
				Sales Tax	

