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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 (FOUNTAIN BROOKS ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, NON-ALLOCATION OF LAND, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦375,000

We act as solicitors to the Petitioner, hereinafter referred to as “**our client**”, and on their behalf 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.

FACTUAL SUMMARY

1. In or around **2021**, our client paid the sum of **₦375,000** to PWAN Group for **survey and documentation fees** for a plot of land at **Fountain Brooks Estate**, Ibeju Lekki, Lagos State.
2. Despite this payment, there has been **no physical allocation, no land, no survey plan, no deed of assignment**, and no refund of the amount paid.
3. Our client has made repeated follow-ups, but PWAN Group has failed, refused, and neglected to honour its obligations.

4. This conduct amounts to clear misrepresentation and fraud, which has caused our client serious financial loss and emotional distress.

CRIMINAL OFFENCES DISCLOSED

The acts of PWAN Group and its agents constitute serious offences under Nigerian law, including:


- **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 Concealment** – contrary to Section 14 of the FCCPA, 2019.

PRAYERS

Accordingly, we respectfully urge your office to:

1. **Launch a criminal investigation** into PWAN Group and its officers for fraud and non-performance.
2. Prosecute all persons responsible for the unlawful collection of money under false pretence.
3. Recover and refund the sum of **₦375,000** to our client without further delay.
4. Award adequate compensation for the loss, inconvenience, and mental suffering endured.
5. Take regulatory measures to prevent PWAN from continuing these deceptive practices.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

PREMIUM

Sales Receipt

Sold to:

[REDACTED]
[REDACTED]
LAND STATE.

Date: 04/06/2021

Receipt #:

File #:

[REDACTED]

Plot Type	Reconciling Bank	Land Location	DURATION
OUTRIGHT RESIDENTIAL PLOT	ZENITH BANK PLC	FOUNTAIN BROOKS GARDENS	
Documentation Fees: 370,000			
Qty	Size #	Description	Line Total
1.00	600sqm	Provisional Survey for One (1) plot of Land at FOUNTAIN BROOKS GARDENS	100,000.00
1.00		Deed of Assignment for One (1) plot of Land at FOUNTAIN BROOKS GARDENS	200,000.00
1.00		Plot Demacation for One (1) plot of Land at FOUNTAIN BROOKS GARDENS	70,000.00
OUTSTANDING BALANCE			