
 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 (FOUNTAIN BROOKS ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, CRIMINAL BREACH OF TRUST, OBTAINING BY FALSE PRETENCE, AND CONSPIRACY TO DEFRAUD – ₦170,000

We are solicitors to the Petitioner and on their behalf, we lodge this formal complaint against **PWAN Group** and its agents for fraudulent misrepresentation, obtaining by false pretence, and criminal breach of trust in connection with the sale of plots at **Fountain Brooks Estate**, Ibeju Lekki, Lagos State.

FACTUAL BACKGROUND

1. In or about **2017**, our client entered into a purchase agreement with PWAN Group for a residential plot of land at **Fountain Brooks Estate**, Ibeju Lekki, Lagos State, for a total agreed sum of **₦2,000,000**.
2. Based on assurances by PWAN's agents that the land was genuine, immediately available, and free of encumbrances, our client made an initial payment of **₦170,000** towards the purchase price.

3. Since that time, despite repeated demands, PWAN Group has failed to deliver any physical allocation, title documents, or refund the amount paid.
4. All follow-up engagements with PWAN's representatives have yielded no credible explanation or remedial action, causing our client emotional distress and financial loss.
5. The conduct amounts to deliberate deception, fraudulent concealment, and breach of contractual and fiduciary obligations owed to the client.

CRIMINAL OFFENCES DISCLOSED

This conduct discloses multiple offences under Nigerian law, including:

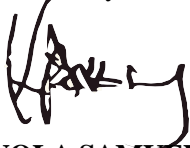
- **Obtaining by False Pretence and Advance Fee Fraud** – under the Advance Fee Fraud Act, 2006;
- **Fraudulent Misrepresentation and Concealment** – under the FCCPA, 2019;
- **Criminal Breach of Trust** – under the Criminal Code Act;
- **Conspiracy to Defraud** – under the Criminal Code Act.

PRAYERS

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

1. Commence a full criminal investigation against PWAN Group and its officers for fraud and breach of trust;
2. Prosecute those found culpable for obtaining money under false pretences;
3. Recover and refund the sum of **₦170,000** to our client forthwith;
4. Compel PWAN Group to halt the marketing of encumbered or non-existent plots;
5. Award suitable compensation for the financial hardship and emotional suffering caused.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

[illegible]

LETTER OF ACKNOWLEDGEMENT

Ayinde Village, Korodo, Ibeju - Lekki Local Government Area, Lagos State.

The expected balance is **N 1,830,000 (One Million Eight Hundred and Thirty Thousand Naira)** only.
of your initial payment, which is to offset the remaining balance.

Thank you very much for subscribing to FOUNTAIN BROOKS GARDENS through PWAN PREMIUM Realtors and Concerns Ltd.

[Signature] 8/11/2017

Mr Adidi David
Admin Officer

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

Tel: 081 0960 0960, 081 8000 0467

Web: www.pwanpremium.com

Email: owanpremium@gmail.com, customersevice@pwanpremium.com

