ELUYEFA CHAMBERS



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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 (OAK HAVEN ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, CRIMINAL BREACH OF TRUST, OBTAINING BY FALSE PRETENCE, AND CONSPIRACY TO DEFRAUD - N3,230,000

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 Oak Haven Estate, Ibeju Lekki, Lagos State, for engaging in deceptive and fraudulent real estate practices.

FACTUAL SUMMARY

- 1. In or about [please confirm the year of transaction], our client purchased a residential plot of land at Oak Haven Estate, Ibeju Lekki, Lagos State, at an agreed total cost of \(\frac{\text{\tilitet{\text{\text{\text{\text{\text{\text{\text{\text{\text{\te}\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\te}\text{\te}\tint{\texi}\text{\text{\text{\text{\texi}\tiex{\text{\text{\text{\text{\tin}\tinithte{\text{\text{\text{\ti
- 2. In addition, our client paid further statutory fees of:
 - N200,000 for the **Deed of Assignment**;
 - N200,000 for Development Fees;

- N30.000 for Demarcation Fees.
 - This brings the total sum paid or committed to \$3,230,000.
- 3. Despite making these payments in good faith, relying on PWAN's representations that the land was genuine and available, our client has to date received **no physical allocation**, **no title documents**, and **no refund** of monies paid.
- 4. Repeated demands, follow-ups and requests for either physical allocation or refund have been ignored by PWAN Group and its agents.
- 5. PWAN's conduct amounts to deliberate **fraudulent concealment**, **misrepresentation**, and **criminal breach of trust**.

CRIMINAL OFFENCES DISCLOSED

The acts of PWAN Group and its agents amount to the following criminal offences under Nigerian law:

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

PRAYERS

In view of the above, our client respectfully prays that your office:

- 1. Initiate a **criminal investigation** into PWAN Group and its directors/agents for fraudulent land sale practices.
- 2. Prosecute all individuals involved in obtaining money by false pretence and concealment of material facts.
- 4. Award **compensation** for the prolonged deprivation, financial loss, and emotional hardship suffered.
- 5. Direct PWAN Group to **cease all marketing** and sales of encumbered or non-existent plots at Oak Haven Estate.

Supporting Evidence: Our client will furnish all necessary documentation, including payment receipts, agreements, and correspondence to aid your investigation.

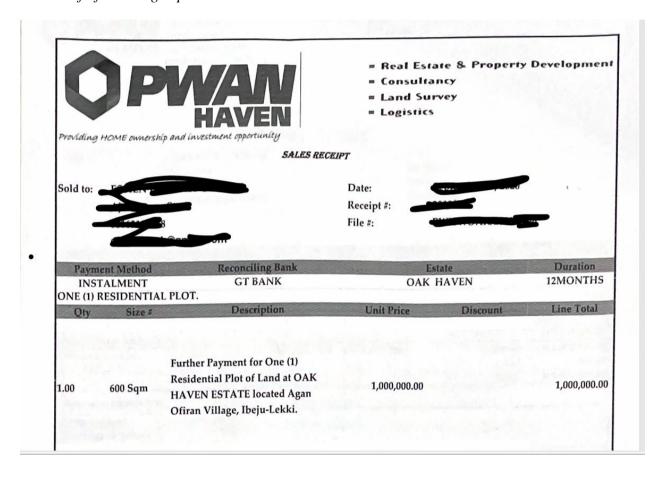
Yours faithfully,

AKINOLA SAMUEL ELUYEFA ESO

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



Outstanding Balance 1,600,000.00 **Total Discount** Subtotal 1,000,000.00 Amount in words: One Million Naira Only. Sales Tax 1,000,000.00 Total VEN INVES OKESANYA MICHAEL Signature FOR PWAN HAVEN LTD: Signature Received By: Contact Address: No 10, Road 7, Lekki County Homes, Ikota Villa Estate, Lekki Epe Expressway, Lagos. Tel: 07026000037, 08107009359. Email Address: pwanhaven@gmail.com Website: www.pwan-haven.com



HEAD OFFICE: No 10, Road 7 Lekki County Homes, Ikota Villa Estate, Lekki Epe Expressway, Lagos State. WARRI OFFICE: 90, Refinery Road Ekpan, Warri, Delta State. Tel: (+234) 014535821,

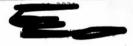
Email: pwanhaven@gmail.com

Sales Receipt

Sold To:



Date: Receipt #: File #: Comment:



Payment Method	Reconciling Bank	Quantity	Estate	Duration
Installment	Guaranty Trust Bank	1	Oak Haven Estate	12Mths

Description		Line Total	
Being Full for One (1) Re Ofiran Village, Ibeju-Lek	sidential Plot of Land at OAK HAVEN ESTATE located Agan		N 1,600,000.00
Amount in words:	One Million Six Hundred Thousand Naira and Zero Kobo	Subtotal	№ 1,600,000.00
		Tax	₩ 0.00
		Total	₦ 1,600,000.00
Additional Information			
Total Amount:	N 2,800,000.00		
Outstanding Balance:	N 0.00		
Size per Plot:	600Sqm		

FOR PWAN Haven Ltd:

CONTRACT OF SALE

BETWEEN

PWAN-HAVEN INVESTMENTS & REALTORS LTD

(THE VENDOR)

AND



(THE PURCHASER)

IN RESPECT OF ONE (1) RESIDENTIAL PLOT OF LAND AT OAK HAVEN ESTATE SITUATE AT AGAN OFIRAN VILLAGE, IBEJU-LEKKI, LAGOS.

	HIS AGREEMENT is made thisday of	_2021
THIS	HIS AGREEMENT	
BETW	ETWEEN	
of the	NAN-HAVEN INVESTMENTS & REALTORS LTD (RC 1427400) a Lifthe Federal Republic of Nigeria with its office at No 10, Road 7, the Federal Republic of Nigeria with its office at No 10, Road 7, the Federal Republic of the one pages (hereinafter referred to as 'THE VENDOR' which expressing the one pages (hereinafter referred to as 'THE VENDOR' which expressentatives and successors-in-title) of the one pages	on shall wherever the context so admits include its
assign	igos (hereinafter referred to as THE VERBOR Which expressions) legal representatives and successors-in-title) of the one passigns, legal representatives and successors-in-title) of the one passigns are passing to the one passing the passing t	art.
AND		ferred to as 'THE PURCHASER' which expression shall
where	herever the context so admits include his heirs, assigns and legal	representatives) of the other part.
WHER	HEREAS:	
	 The Vendor is a real estate Marketing and Investment Comvast tracts of communal/family land into gated and fenced 	estates.
	ituato at Agan Ofiran Village, Ibeiu-Lekki Local Govern	nment Area Lagos State and measuring approximately
	60ft by 120ft each belonging Under Native law and custom	to members of the Mannath Lampy

Gbadamosi Danogun Family of Korodo Land, Ibeju Agbe in Ibeju-Lekki Local Government Area Lagos State who

The Vendor with intent to achieve its object of development of estate into gated and fenced estate has procured

The vast tracts of land acquired by the Vendor is now appropriately described as OAK HAVEN ESTATE.

have been in undisturbed and uninterrupted possession from time immemorial.

DOCUMENTATION FEE:

Registered Survey Plan Fee: №400, 000 per plot

ii. Deed of Assignment: N200, 000 per plot

iii. Plot Demarcation Fee: \$\\\30,000 per plot

iv. Facilitation Fee: ₩200, 000 per plot

INFRASTRUCTURE/DEVELOPMENT FEE:

Such as Gate House, Perimeter Fencing, Road Network, Street Lights, Supervisory Fee, and Security Fee (to be

- d. The Purchaser shall endorse and comply with the Rules and Regulations to the Scheme provided by the Vendor prior to during or after the allocation of the One (1) Plot within the Scheme. Such Rules and Regulations include, but not limited to Estate management rules, Security and Safety rules, Aesthetics and Building Design, Usage and service, environmental and conduct rules. This rules are to ensure basic level of hospitality, privacy, peace and tranquility within the estate.
- e. The Vendor shall from time to time issue directives and handbooks to residents towards the realization of the functionality of the Scheme.

THE PURCHASER HEREBY COVENANTS WITH THE VENDOR as follows:

- a. To make payment for survey plan and legal fees (documentation fee) in respect of the One (1) Plot of land.
- b. To make payment for infrastructural/development fee (to be communicated later)
- c. To abide by the set rules and regulations towards the functionality of the scheme
- d. If the purchaser wishes to withdraw from this scheme at any time before plot allocation/possession is taken
 - To give a notice of 90 days, and 60 days thereafter if the refund is not ready at the expiration of

IN WITNESS WHEREOF, the Parties have hereto set their hands and sealed the day and year first above written.

THE COMMON SEAL of THE VENDOR is affixed PWAN-HAVEN INVESTMENTS & REALTORS LTD

MD/C.E. O

SIGNED, SEALED AND DELIVERED By the within named 'PURCHASER'

In the presence of:

Name: On Jets Company Comp