ELUYEFA CHAMBERS



No. 22 Admiralty Way, Lekki Phase 1

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07077513836

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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 (DIAMOND ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, NON-ALLOCATION OF LAND, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – \$14,000,000

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 **Diamond Estate**, Ibeju Lekki, Lagos State.

FACTUAL SUMMARY

- 1. In or around 2023, our client purchased a plot of land priced at ₹14,000,000 at Diamond Estate, Ibeju Lekki, Lagos State.
- 2. Despite making substantial payments towards the total cost of the land, PWAN Group has failed, neglected, and refused to carry out any **physical allocation** of the said property.
- 3. Repeated requests for either a **valid allocation** or a **full refund** have been ignored by PWAN Group and its agents.

4. This deliberate inaction has caused our client severe financial hardship, loss of trust, and emotional distress.

CRIMINAL OFFENCES DISCLOSED

The conduct of PWAN Group and its agents amounts to serious infractions 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

Given the above, we respectfully request that your office:

- 1. **Commence a thorough criminal investigation** into PWAN Group's dealings regarding Diamond Estate.
- 2. Prosecute all officers and agents involved in this fraudulent land sale scheme.
- 3. Recover and refund the full sum of ₹14,000,000 to our client without delay.
- 4. Award appropriate compensation for the hardship and losses suffered.
- 5. Take regulatory measures to stop the continued marketing of undeveloped or encumbered estates by PWAN and protect other buyers from similar exploitation.

Yours faithfully,

AKINOLA SAMUÉL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

Sales Receipt

Sold To:







Payment Method	Reconciling Bank	Estate	Duration
Installment	ZENITH BANK	Hectares of Diamond 2	12 Mths

Description	Line	
Being final payment for 2.00 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		M 1,000.000.00
Amount in words: One Million Naira and Zero Kobo Only	Subtotal Tax Total	N 1,000,000.00 N 0.00 N 1,000,000.00

Additional Information

Total Amount: № 13,000,000.00 Outstanding Balance: № 0.00 Size per Plot: 600 Sqm

FOR PWAN Homes Ltd:



HEAD OFFICE: Floor 1 to 5 PURI Mill Building, KM 25, LeMil Epe Expressway, Opposite Lagos State University (LASU), Oto Ado, Ajith, Lagos INEJA OFFICE: 16A Sule Abuler Close, Off Opebi Road by GTB, Opebi, Reja, Lagos Tel: +234-12956848, +234-14533669
Email: info@pwarhomes.com

Sales Receipt

Sold To:

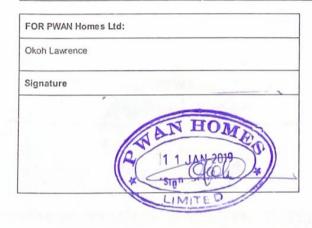




Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description 2		Line Total
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		₩ 1,000,000.00
Amount in words: One Million Naira and Zero Kobo Only	Subtotal Tax	₩ 1,000,000.00 ₩ 0.00

Description 2	1	Line Total
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		N 1,000,000.00
Amount in words: One Million Naira and Zero Kobo Only	Subtotal Tax Total	¥ 1,000,000.00 ₩ 0.00 № 1,000,000.00
Additional Information		
Total Amount: № 13,000,000.00 Outstanding Balance: № 8,700,000.00 Plot Size: 600 Sqm		



Sales Receipt

Sold To:





Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12Mths

Description		Line Total
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		₩ 700,000.00
Amount in words: Seven Hundred Thousand Naira and Zero Kobo Only	Subtotal Tax Total	₩ 700,000.00 ₩ 0.00
Additional Information		
Total Amount: № 13,000,000.00 Outstanding Balance: № 11,700,000.00 Plot Size: 600 Sgm		y 17

FOR PWAN Homes Ltd:	
AKINLEYE SAMUEL	100
Signature	,



(IASU), OR ANN, Ajeri, Leigus INEJA OFFICIE 16A Sule Abuka Close, Off Opebi Road by GTB, Opebi, kaja, Leigos Tel: +234-12866848, +234-14533669 Brnail: info@pwanhorres.com

Sales Receipt

Sold To:





Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description		Line Total
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		₩ 2,000,000.00
Amount in words: Two Million Naira and Zero Kobo Only	Subtotal Tax Total	₦ 2,000,000.00 ₦ 0.00
Additional Information		
Total Amount: № 13,000,000.00 Outstanding Balance: № 9,700,000.00		
Plot Size: 600 Sqm		



HEAD OFFICE Floor 1 to 5 FURI Mall Building, KM25, Lelvi Epe Expressway, Opposite Lagos State University (LASU), Oko Ado, Ajah, Lagos IKEJA OFFICE: 16A Sule Abuka Otose, Off Opebi Road by GTB, Opebi, Ileja, Lagos Tet: +234-12556948, +234-14533669
Email: info@owanhomes.com

Sales Receipt

Sold To:





Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12Mths

Description		Line Total
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		₩ 400,000.00
Amount in words: Four Hundred Thousand Naira and Zero Kobo Only	Subtotal Tax Total	№ 400,000.00 № 0.00 № 400,000.00
Additional Information		
Total Amount: N 13,000,000.00		



(LASU), Oko Ado, Ajah, Lagos INELIA OFRCE 16A Sule Atuka Ocse, Off Opebi Road by GTB, Opebi, keja, Lagos Tel: +234-12956848, +234-14533669 Email: info@pwanhorres.com

Sales Receipt

Sold To:





Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12Mths

Description		Line Total
Being initial payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		₩ 200,000.00
Amount in words: Two Hundred Thousand Naira and Zero Kobo Only	Subtotal Tax Total	¥ 200,000.00 ₩ 0.00 ¥ 200,000.00
Additional Information		
Total Amount: № 13,000,000.00 Outstanding Balance: № 12.800.000.00		

Sales Receipt

Sold To:





Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description	二人	Line Total
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		N 1,000,000.00
Amount in words: One Million Naira and Zero Kobo Only	Subtotal Tax Total	№ 1,000,000.00 № 0.00 № 1,000,000.00
Additional Information		
Total Amount: № 13,000,000.00 Outstanding Balance: № 7,700,000.00 Plot Size: 600 Sqm		

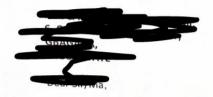
16. 18.



HEAD OFFICE: No 6 Ogbeni Street, THERA ANNEX, off Lekki-Epe Expressway by Conoil Filling Station, beside Golden Park Estate, Ogidan, Ajah, Lekki, Lago Tel: +234 1 2956848

IKEJA OFFICE: 16A Sule Abuka Close off Opebi Road by GTB, Opebi, Ikeja, Lagos. Tel: +234 1 2957206. Emails: pwanltd@yahoo.com.info@pwanbopses.

31st July, 2017



LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of №200, 000 (Two Hundred Thousand Naira) only, being part- payment for Two (2) plots measuring 600 square meters of land each, in HECTARES OF DIAMOND PHASE 2 ESTATE, situate at Sangotedo Village, behind Monastery in Eti-Osa Local Government Area, Lagos State.

The total cost of the plots as at the date of this payment is №13, 000, 000 (Thirteen Million Naira) only, for the Twelve months scheme.

The expected balance is \$12,800,000 (Twelve Million, Fight Hundred Thousand Naira)

You are expected to pay \$\pm41, 066, 667.00 (One Million, Sixty-Six Thousand, Six Hundred and Sixty-Seven Naira) Monthly, before the end of every month starting from the month of August, 2017 which is to offset the remaining balance of \$\pm12, 800, 000 (Twelve Million, Eight Hundred Thousand Naira) only.

(Note that any default in your payment shall attract extra charges).

Thank you very much for subscribing to HECTARES OF DIAMOND PHASE 2 ESTATE through PWAN Homes Ltd.

Yours sincerely,

Orevaoghene Araka (Barr) FOR: PWAN Homes Ltd.

...making home ownership dreams a reality

www.pwanhomes.com



HEAD OFFICE Roor 1 to 5 PLFI Mall Building, KM25, Lelkli Epe Expressway, Opposite Lagos State University (LASU), Oxo Ado, Ajah, Lagos INGLIA OFFICE 16A Sulle Abuka Close, Off Opebi Road by GTB, Opebi, keja, Lagos Tel: +234-12956848, +234-14533669 Email: info@pwanhomes.com

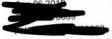
Sales Receipt

Sold To:



Date: Receipt #: File #:

File #: Comment:



Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description		Line Total
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2		₩ 700,000.00
Amount in words: Seven Hundred Thousand Naira and Zero Kobo Only	Subtotal Tax	₩ 700,000.00 ₩ 0.00
	Total	₩ 700,000.00