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 (FOUNTAIN BROOKS ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, CRIMINAL BREACH OF TRUST, OBTAINING BY FALSE PRETENCE, AND CONSPIRACY TO DEFRAUD – \$\infty\$600,000

We act as solicitors to the Petitioner and hereby submit this formal petition against **PWAN Group** and its agents for fraudulent marketing, obtaining by false pretence, and criminal breach of trust in respect of the sale of land at **Fountain Brooks Estate**, Ibeju Lekki, Lagos State.

FACTUAL BACKGROUND

- 1. In or about **2018**, our client entered into a purchase agreement with PWAN Group for a residential plot at **Fountain Brooks Estate**, Ibeju Lekki, at an agreed total price of **N2,000,000**.
- 2. Relying on assurances by PWAN's agents that the land was genuine, free from encumbrances, and ready for immediate allocation, our client made an initial payment of **N600,000**.
- 3. Despite repeated demands and follow-ups over several years, PWAN Group has failed to allocate any plot, issue title documents, or process a refund.
- 4. To date, our client remains deprived of the land, the money paid, and any reasonable explanation resulting in undue financial loss and emotional hardship.

5. This conduct amounts to fraudulent misrepresentation, willful concealment, and a breach of contractual and fiduciary obligations.

CRIMINAL OFFENCES DISCLOSED

PWAN Group's conduct discloses multiple offences under Nigerian law, including:

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

PRAYERS

In view of the foregoing, we respectfully request that your office:

- 1. Open a criminal investigation against PWAN Group and its responsible officers for fraud and breach of trust;
- 2. Prosecute those involved for obtaining funds under false pretences;
- 3. Recover and refund the sum of \(\frac{\text{\tin}\text{\tetx{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\texi}\text{\texit{\text{\texi}\text{\texit{\texict{\texit{\texi{\texi{\tex{\texit}\xi}\tint{\texitt{\text{\texit{\texi{\texi{\texi{\texi{\t
- 4. Compel PWAN Group to cease the marketing of encumbered or non-existent plots;
- 5. Award reasonable compensation for the severe financial and emotional losses suffered by our client.

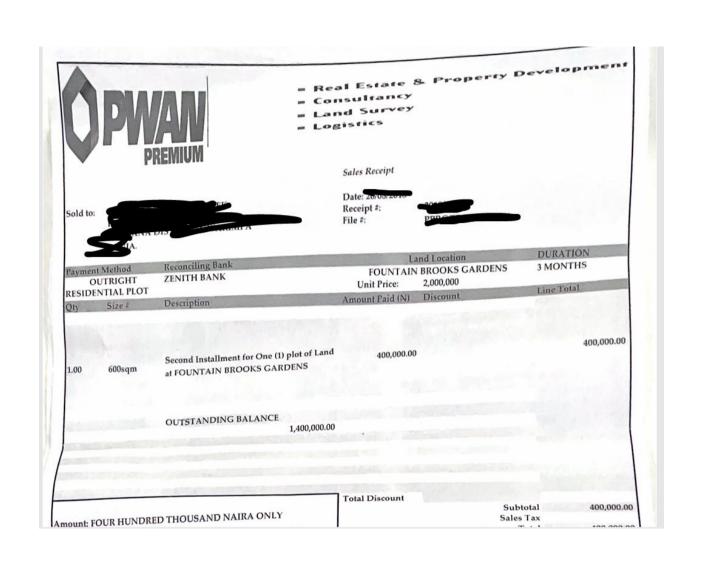
Yours faithfully,

AKINOLA SAMUÉL ELUYEFA ESQ

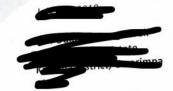
Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner







Dear Sir,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge receipt of your payment of \$\ 200,000 (Two Hundred Thousand Naira) only, being initial payment for One (1) plot of land measuring 600 square meters at FOUNTAIN BROOKS GARDENS, situate at

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

The total cost of your plots being payment by Instalment as at the date of this payment is ₦2, 000,000 (Two Million Naira) only.

The expected balance is № 1,800,000 (One Million Eight Hundred Thousand Naira) only.

You are expected to pay the above sum within a period of Three (3) months from the date of your last payment, which is to offset the above balance.

Please also NOTE that failure to make the above payment within the above stated Three (3) months period automatically converts your payment plan to a Twelve (12) Months Instalment Plan, the effect of which subjects you to a total payment of \$\text{\ticl{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\texi}\text{\text{\texict{\text{\texi}\text{\text{\texit{\text{\texi}\text{\text{\texit{\text{\texit{\text{\text{\ti Naira) only, payable across twelve (12) months, as against the previous total cost.

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





Dear Sir,

NOTICE OF PLOT RESERVATION

This is to acknowledge that One (1) plot of land have been reserved in your favour with the following details:

Name: Mr. Odaro Uyiosa Derek Estate: FOUNTAIN BROOKS GARDENS Area: Block D (Residential Block)

Plot No: D262

Please also **NOTE** that the above reservation is subject to physical allocation and full payment for your plot.

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

