



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](mailto: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](mailto:info@pwangroup.com), [pwanpronigeria@gmail.com](mailto:pwanpronigeria@gmail.com)

**PETITION AGAINST PWAN GROUP (MARYWOOD GARDEN ESTATE, AMANSEA PHASE 2, AWKA) FOR FRAUD, NON-ALLOCATION, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦5,860,000**

We are solicitors to the Petitioner, hereinafter referred to as “*our client*,” and on their behalf, we respectfully submit this formal criminal complaint against **PWAN Group**, and its subsidiary responsible for the management and sale of **Marywood Garden Estate, Amansea Phase 2, Awka, Anambra State**.

## FACTUAL SUMMARY

1. In **2023**, our client subscribed to one (1) commercial plot of land at **Marywood Garden Estate, Amansea Phase 2, Awka, Anambra State**, paying a total of **₦5,860,000 (Five Million, Eight Hundred and Sixty Thousand Naira)** covering:
  - ₦4,400,000 for the cost of the commercial plot;
  - ₦1,460,000 for the survey plan, deed of assignment, and all other required documentation fees.

2. In **December 2023**, PWAN staff organized a site visit for our client and other subscribers, promising that allocation and development would commence immediately, with full physical allocation by **March 2024**.
3. Since then, despite the passage of time and repeated follow-ups, PWAN Group has **failed to carry out the physical allocation**, issue valid land documentation beyond the receipts, or communicate a definite timeline for fulfilling its contractual obligation.
4. Instead, our client has been referred endlessly between Lagos and Anambra offices without meaningful updates. Eventually, a contact named *Ndubuisi* (claimed to be the Project Manager) was provided, but when contacted, he was aggressive and dismissive, telling our client to stop “disturbing” and refusing to provide any helpful information.
5. This extended delay has caused our client financial hardship, uncertainty, and distress, despite having fully paid all agreed sums for the plot and related documentation.

## CRIMINAL OFFENCES DISCLOSED

The conduct of PWAN Group and its responsible agents discloses multiple breaches of Nigerian criminal and consumer protection laws, including:

- **Advance Fee Fraud and Obtaining by False Pretence** – 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;
- **Unfair Business Practices and Misrepresentation** – contrary to Section 14 of the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- **Cheating** – contrary to Section 421 of the Penal Code (where applicable).

## PRAYERS

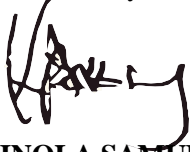
In view of the above, we respectfully request the following:

1. That your office immediately commences a full criminal investigation into the actions of PWAN Group and its agents concerning Marywood Garden Estate, Amansea Phase 2.
2. That all officers found culpable for fraud, misrepresentation, or breach of trust be prosecuted to the fullest extent of the law.
3. That PWAN Group be compelled to either:
  - Allocate the fully paid-for commercial plot of land to our client without any further delay;
  - or**
  - Refund the total sum of **₦5,860,000** with interest and additional compensation for financial hardship, time wasted, and emotional distress.
4. That your office ensures PWAN Group halts any further marketing or sale of unallocated plots in Marywood Garden Estate until all outstanding obligations are met.

Our client is ready to present proof of payment, site visit evidence, official receipts, and all related documents to assist your investigation and enforcement.

We thank you for your swift attention to this serious complaint.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the alleged petitioner*

21'

House 11, Road 24, Ikota Villa Estate,  
beside Mega Chicken, Ikota Lekki, Eti-Osa, Lagos  
234818888861, +2348180000781

**PWAN  
LEGEND**

[Redacted]

Dear Esteemed Client,

**PAYMENT NOTIFICATION LETTER**  
Sequel to the completion and receipt of your full Payment for One (1) Commercial Corner Piece Plot of Land  
MARYWOOD GARDENS AMANSEA SCHEME II, situated at Awka, Anambra State.

Please find below the Payments Summary & Description of the Serviced Plot you purchased:

Full Payment For One (1) Commercial Corner Piece Plot of Land Was Made on 21<sup>st</sup> July 2023: NGN4,400,000.  
Full Payment For Development, Deed of Assignment, Registered Survey & Plot Demarcation Fees: NGN1,460,000.  
TOTAL: NGN5,860,000.

**LOCATION:** Amansea, Awka Local Government Behind Unizik Awka, Anambra State.  
**TYPE/SIZE:** One (1) Commercial Corner Piece Plots of Undeveloped parcel of Land Measuring 4645Q.M.  
**TITLE:** Registered Survey & Deed of Assignment.

The Purchaser has made the following payments into our ZENITH Account:

1. Survey Plan Fee: ₦380,000.00 only per plot as the cost for your Registered Survey Plan to be made.
2. Plot Demarcation Fee: ₦30,000.00 only per plot for your plot demarcation.
3. Deed of Assignment Fee: ₦150,000.00 only per plot for Legal and Signing fee for your Deed of Assignment.
4. Development Fee: ₦900,000.00 only per plot which covers for Infrastructures like paved roads, fencing, recreational center/club house, security, gate house, street lights and green areas.

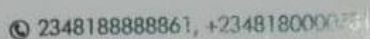
Payments was made into our Zenith Bank branch.  
Account Name: **PWAN LEGEND REALTORS & INVESTMENTS LTD** | Account Number: **1015518537**.

Your Survey Copy containing full details of your plot shall be made available to you after your physical allocation payment as indicated above.

Thank you very much for partnering with us to make home ownership dreams a reality for as many people as possible.

Sincerely,

**SIGNED.**  
**MANAGEMENT.**  
**PWAN LEGEND REALTORS AND INVESTMENTS LTD.**  
**PREPARED BY: SOLOMON KENECHUKWU**



## Sold to

Date:  
Receipt #:  
File #:

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# FULL PAYMENT RECEIPT

Date: [REDACTED]  
Receipt #: [REDACTED]  
File #: [REDACTED]

Land Location: MARYWOOD GARDENS AMANSEA Scheme II, AWKA

Reconciling Bank: PWAN LEGEND - ZENITH BANK

Duration: [REDACTED]

Line Total

Qty	Size	Description	Amount	Discount
1	464SQM	Full Payment for One (1) Commercial Corner Piece Plot of Land at MARYWOOD GARDENS AMANSEA Scheme II, Awka, Anambra State.	NGN4,400,000.00	

4,400,000.00

Total Amount Paid: NGN4,400,000.00

Outstanding Balance: NONE

Total Discount: NGN0.00

Amount in words: Four Million Four Hundred Thousand Naira Only.

Subtotal  
Sales Tax  
Total

4,400,000.00  
4,400,000.00

FOR:  
PWAN LEGEND  
REALTORS AND INVESTMENTS LTD.  
PREPARED BY: SOLOMON KENICHUKWU