



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 (SUNSHINE ESTATE, IBUSA, ASABA) FOR FRAUD,
CONCEALMENT OF MATERIAL FACTS, CRIMINAL BREACH OF TRUST, AND CONSPIRACY
TO DEFRAUD – ₦1,000,000**

We act as solicitors to the Petitioner, hereinafter referred to as “our client”, and on their behalf, we write to lodge this formal complaint against **PWAN Group** and its agents responsible for the marketing and sale of plots at **Sunshine Estate, Ibusa, Asaba, Delta State**, for engaging in deceptive real estate practices that amount to **fraud, concealment, and breach of trust**.

FACTUAL SUMMARY

1. In or around **2019**, our client purchased **one (1) residential plot of land** at **Sunshine Estate, Ibusa, Asaba, Delta State**, marketed and sold by agents of the **PWAN Group**.
2. The sum of **₦1,000,000 (One Million Naira)** was paid in full, and the company subsequently **carried out a physical allocation** of the said property.
3. However, after the purported allocation, our client discovered that the land was subject to an ongoing **court dispute** and is currently **under litigation**, which was **never disclosed** by PWAN at the time of sale or during the allocation process.
4. Despite follow-up enquiries, PWAN has failed to provide:
 - o Full and accurate disclosure about the court case;
 - o Any form of compensation, replacement plot, or refund;

- Title documents or formal explanation regarding the current legal status of the land.
- 5. Our client reasonably relied on PWAN's representations that the land was free from encumbrances. The **failure to disclose the existence of litigation** amounts to a **willful concealment of a material fact**.
- 6. The continued retention of the purchase sum by PWAN, without providing clear possession, compensation, or an alternative property, has caused our client **serious financial loss and mental anguish**.

CRIMINAL OFFENCES DISCLOSED

The conduct of PWAN Group and its agents amounts to serious violations of 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 / Misrepresentation** – contrary to Section 14 of the *Federal Competition and Consumer Protection Act (FCCPA), 2019*;
- **Deprivation of Property Use** and fraudulent marketing.

PRAYERS

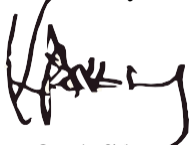
In view of the above, we respectfully request that your office:

1. **Initiate a criminal investigation** into PWAN Group and its officers regarding the sale of encumbered land;
2. **Prosecute all individuals responsible** for the unlawful concealment, misrepresentation, and financial exploitation of our client;
3. **Recover and refund the full sum of ₦1,000,000** to our client, or in the alternative, **allocate a valid replacement plot** free of encumbrance;
4. **Compel PWAN Group to disclose the full status of litigation** affecting Sunshine Estate and refrain from selling any part of the disputed estate;
5. **Award appropriate compensation** to our client for emotional and financial damages suffered;
6. Take regulatory action to **prevent the continued marketing of encumbered estates** by PWAN and ensure restitution to all similarly affected buyers.

We are prepared to submit all supporting documentation including **payment evidence, allocation papers**, and communications, and will fully cooperate with your investigation.

Thank you for your anticipated action.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



Floor 1 - 5 Puri Mall Building, Km 25, Lekki Epe Expressway
Opposite Leafwood Hotel (See Centre)
Oko Ajo, Ajah, Lagos State
☎ +234-1-2956848, +234-1-4534177, +234-1-4533669

JANUARY 29, 2019

Dear Ma,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦100,000.00 (One Hundred Thousand Naira)** only, being part- payment for **One (1) Residential plot** measuring **464sqm** of land, in **SUNSHINE CITY ESTATE** situate at Umuwuagwu Village, Ibusa, Oshimili North Local Government Area, Delta State.

The total cost of the plot as at the date of this payment is **₦700, 000.00 (Seven Hundred Thousand, Naira)** only, for the Twelve- months' scheme.

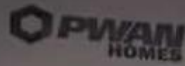
The expected balance is **₦600, 000.00 (Six Hundred Thousand, Naira)** only.

You are expected to pay a minimum of **₦54, 546.00 (Fifty-Four Thousand, Five Hundred and Forty-Six Naira)** Monthly, before the end of every month starting from the month of February 2019, which is to offset the remaining balance of **₦600, 000.00 (Six Hundred Thousand, Naira)** only.

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

Thank you very much for subscribing to in **SUNSHINE CITY ESTATE** through **PWAN Homes Ltd.**

Yours sincerely,



PWAN HOMES (NIG) LTD
13, Oluwalanjo Road, Lagos
P.O. Box 1234, Lagos
Tel: 01-1234 5678, 01-9876 5432
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Date:
Receipt #:
File #:
Contract:

Payment Method	Receiving Bank	Location	Duration
Installment	0821000000 - Zenith Bank Plc	Sunshine City Estate	12 Mths

Description	Line Total
Being initial payment for 1 Plot(s) of (1000) Land at Sunshine City Estate	N 100,000.00
Amount in words: One Hundred Thousand Naira and Zero Kobo Only	
	Subtotal N 100,000.00
	Tax N 0.00
	Total N 100,000.00

Additional Information

Total Amount: N 700,000.00
Outstanding Balance: N 600,000.00
Plot Size: 464 Sqm

FOR PWAN Homes Ltd:

DADA AWOLUNWAPO

Signature



[REDACTED]

PWAN HOMES LTD
(THE VENDOR)
AND

[REDACTED]

CHIDI U. OBINWANNE, ESQ.
GAMALIET'S ADVOCACY
SUITE JAGS, ROAD 5
IKOTA SHOPPING COMPLEX
VSC, LEM
LAGOS



ONE NO.: 08144472094

Emmott