



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) FOR FRAUD, CRIMINAL BREACH OF TRUST, UNLAWFUL CONCEALMENT, AND CONSPIRACY TO DEFRAUD – ₦7,200,000

We act as solicitors to the Petitioner, hereinafter referred to as “our client”, and on their behalf, we hereby lodge this formal complaint against PWAN Group and its agents involved in the marketing and sale of plots at Fountain Brooks Estate, Ibeju Lekki, Lagos State, for fraudulent conduct, unlawful retention of client funds, and criminal breach of trust in violation of Nigerian law.

FACTUAL SUMMARY

1. In or around 2016, our client subscribed to purchase a plot of land at Fountain Brooks Estate, Ibeju Lekki, Lagos State, marketed and sold by agents acting on behalf of PWAN Group.
2. The total agreed purchase price for the land was ₦3,800,000 (Three Million Eight Hundred Thousand Naira).

3. Our client faithfully made payments towards the purchase price, paying up to ₦1,100,000 (One Million One Hundred Thousand Naira) before circumstances beyond their control made it necessary to discontinue further payments and request a refund of the balance paid.
4. At the time of withdrawal from the transaction, a balance of ₦2,700,000 (Two Million Seven Hundred Thousand Naira) remained with PWAN Group as unutilised funds for which no land was ever allocated.
5. Despite repeated formal and informal requests by our client since 2016, PWAN Group has failed, neglected, and refused to process any refund, nor has it offered any credible explanation for retaining the funds without allocating land or providing an alternative resolution.
6. The continued retention of our client's funds without providing land, processing a refund, or offering any replacement plot amounts to criminal breach of trust, unlawful conversion, and fraudulent misappropriation of customer funds.
7. Our client's repeated demands for a resolution have been ignored, causing prolonged financial hardship, mental distress, and unjust deprivation of legitimate property rights.

CRIMINAL OFFENCES DISCLOSED

PWAN Group's conduct as detailed above constitutes the following offences under Nigerian law:

- 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;
- Unlawful Conversion and Fraudulent Retention of Property – contrary to applicable provisions of the Criminal Code and the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- Deprivation of Property Use and Unfair Trade Practice.

PRAYERS

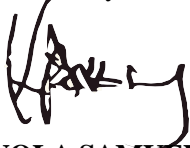
In view of the facts above, we respectfully urge your office to:

1. Commence an urgent criminal investigation into the actions of PWAN Group and its officers in connection with the fraudulent sale and non-refund relating to Fountain Brooks Estate;
2. Prosecute all individuals responsible for obtaining our client's money under false pretences and unlawfully withholding same;
3. Recover and refund the full outstanding sum of **₦7,200,000** to our client without any further delay;
4. Direct PWAN Group to provide full disclosure on the status of Fountain Brooks Estate and refrain from misleading new buyers where existing subscribers remain unpaid or unallocated;
5. Award fair compensation to our client for the prolonged financial and emotional suffering occasioned by PWAN Group's unlawful conduct;
6. Implement measures to protect other innocent buyers from similar fraudulent real estate schemes perpetuated by PWAN Group and its associated marketers.

Our client stands ready to present all relevant supporting documents, including payment receipts, transaction records, and correspondence with PWAN Group, and will fully cooperate with your investigation and any prosecution that follows.

We trust that your office will act swiftly to ensure that justice is served and to deter future fraudulent activities within Nigeria's real estate sector.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Akinola Samuel Eluyefa', written in a cursive style.

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



**PWAN PREMIUM
REALTORS & CONCERNS**

~~15th, 2018.~~

~~Mr. [Redacted]
[Redacted]
[Redacted]
Lagos State.~~

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 Two (2) plots of land measuring 600 square meters each 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 **₦4,000,000 (Four Million Naira)** only.

The expected balance is **₦ 3,800,000 (Three 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.

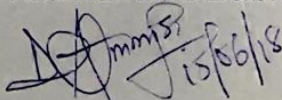
Please also **NOTE** that failure to make the above payment within the above stated Three (3) months

period automatically converts your payment plan to a Twelve (12) Months Instalment Plan, the effect of which subjects you to a total payment of **₦5,000,000 (Five Million 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.

Yours faithfully,

PWAN PREMIUM REALTORS AND CONCERNS LTD.



Mr. Adidi David
Admin Officer

Contact Address:

Plot 18, Udo Wogu Drive, Chevy Villa Estate, Chevron Drive Lekki, Lagos.

Tel: 081 0960 0960, 081 8000 0467

Web: www.pwanpremium.com

Email: pwanpremium@gmail.com, customerservice@pwanpremium.com



NOTICE OF PLOT RESERVATION

Name: _____

Thank you very much for subscribing to **FOUNTAIN BROOKS GARDENS** through **የፕላን ፕላንቲፎርም** Realtors and Concerns Ltd.

Mr. Adidi David
Admin Officer

Email: pwanpremium@gmail.com, customerservice@pwanpremium.com

- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

Sales Receipt

Sold to:

Date: [REDACTED]
 Receipt #:
 File #:

Payment Method	Reconciling Bank	Land Location	DURATION		
OUTRIGHT RESIDENTIAL PLOT	ZENITH BANK	FOUNTAIN BROOKS GARDENS	3 MONTHS		
		Unit Price:	2,000,000		
Qty	Size #	Description	Amount Paid (N)	Discount	Line Total
2.00	600sqm	Initial Payment for Two (2) plots of Land at FOUNTAIN BROOKS GARDENS	100,000.00		200,000.00
		OUTSTANDING BALANCE	3,800,000.00		
			Total Discount		
				Subtotal	200,000.00



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

Sales Receipt

Sold to:

[REDACTED]

Date: 12/07/2018

Receipt #:

File #:

[REDACTED]

Payment Method		Reconciling Bank	Land Location	DURATION	
OUTRIGHT		ZENITH BANK	FOUNTAIN BROOKS GARDENS	3 MONTHS	
RESIDENTIAL PLOT			Unit Price: 2,000,000		
Qty	Size #	Description	Amount Paid (N)	Discount	Line Total
2.00	600sqm	Second Installment for Two (2) plots of Land at FOUNTAIN BROOKS GARDENS	250,000.00		500,000.00

OUTSTANDING BALANCE

3,300,000.00

Total Discount



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

Sales Receipt

Sold to:

[REDACTED]

Date: 28/06/2022

Receipt #:

File #:

[REDACTED]

Payment Method		Reconciling Bank	Land Location	DURATION
INSTALLMENT		ZENITH BANK PLC	FOUNTAIN BROOKS GARDENS	12 MONTHS
RESIDENTIAL PLOT			Unit Price: 2,500,000	Line Total
Qty	Size #	Description	Amount Paid (N)	Discount
2.00	600sqm	Sixth Installment for Two (2) plots of Land at FOUNTAIN BROOKS GARDENS		1,000,000.00
OUTSTANDING BALANCE			1,700,000.00	



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

Sales Receipt

Sold to: [REDACTED]
LAGOS STATE.

Date: 12/06/2020
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method		Reconciling Bank	Land Location		DURATION
INSTALLMENT RESIDENTIAL PLOT		ZENITH BANK PLC	FOUNTAIN BROOKS GARDENS		12 MONTHS
			Unit Price: 2,500,000		
Qty	Size #	Description	Amount Paid (N)	Discount	Line Total
2.00	600sqm	Fourth Installment for Two (2) plots of Land at FOUNTAIN BROOKS GARDENS	300,000.00		600,000.00
OUTSTANDING BALANCE			3,200,000.00		



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

Sales Receipt

Sold to: [REDACTED]

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

Payment Method		Reconciling Bank	Land Location		DURATION
INSTALLMENT RESIDENTIAL PLOT		ZENITH BANK PLC	FOUNTAIN BROOKS GARDENS		12 MONTHS
			Unit Price:	2,500,000	
Qty	Size #	Description	Amount Paid (N)	Discount	Line Total
2.00	600sqm	Fifth Installment for Two (2) plots of Land at FOUNTAIN BROOKS GARDENS	250,000.00		500,000.00
OUTSTANDING BALANCE			2,700,000.00		