



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 PLUS (PWAN GROUP) FOR FRAUDULENT LAND SALE, MISREPRESENTATION,
AND NON-ALLOCATION – ₦3,000,000 TOTAL MONETARY LOSS**

We hereby petition **PWAN PLUS**, a subsidiary of the **PWAN GROUP**, for engaging in fraudulent misrepresentation, breach of contract, and intentional infliction of emotional distress in connection with the sale of land at **Ibuso, Asaba, Delta State**, for which a total of **₦3,000,000** has been paid without any allocation to date.

The company has employed deliberate deception, shifting narratives, and false promises to extort additional payments under the guise of a “development levy” and continues to deny our client rightful access to the land purchased in good faith.

DETAILED FACTS OF THE CASE

1. On **6th November 2024**, our client made a payment of **₦2,500,000** to **PWAN PLUS** on behalf of his aunt (a citizen of **Niger Republic**) for the purchase of a plot of land in **Ibuso, Asaba, Delta State**.
2. In **January 2025**, PWAN PLUS claimed they were unable to carry out allocation due to security concerns—specifically reports of kidnappings around the estate location. Our client accepted this explanation and waited patiently for the situation to improve.
3. After six (6) months of silence, on **31st May 2025**, our client visited the PWAN PLUS office in Asaba to demand accountability. During this visit, he was informed that allocation could not proceed due to his **alleged failure to pay a ₦2,000,000 development levy**, a condition that had **not been previously disclosed** or agreed upon at the time of purchase.
4. After negotiating and pleading based on financial constraints, PWAN PLUS agreed to accept **₦500,000 (25% of the development levy)** with a clear assurance that the land would be allocated **within seven (7) days** after payment, as stated by their allocation officer.

5. Acting on this agreement, our client's aunt promptly transferred the ₦500,000 on the **same day (31st May 2025)**, bringing total payments to **₦3,000,000**.
6. Despite this, PWAN PLUS **reneged on the 7-day promise** and now claims the client must wait another **three (3) months** before allocation can be made—an arbitrary and deceptive shift in terms that amounts to a **calculated act of bad faith and economic exploitation**.
7. The situation has caused serious emotional trauma to our client, who now bears the brunt of his aunt's disappointment and anger, having merely acted as a facilitator in a transaction that has turned fraudulent.

APPLICABLE LEGAL BREACHES

PWAN PLUS's actions violate multiple provisions of Nigerian law, including:

- **Advance Fee Fraud** – Section 419 of the Criminal Code for receiving money under false pretenses.
- **Criminal Breach of Trust** – Section 312 for misappropriating funds held in trust.
- **Deceptive Trade Practices** – Section 14 of the FCCPA 2019 for non-disclosure and misleading representations.
- **Breach of Contract** – For failure to allocate land after payment and breach of express promises.
- **Emotional Distress & Financial Duress** – Under Nigerian tort principles and equitable doctrines.

RELIEFS SOUGHT

We respectfully request the intervention of appropriate regulatory and enforcement agencies to ensure that PWAN PLUS:

1. **Immediately refunds the total sum of ₦3,000,000** (₦2.5M for land + ₦500K levy) to the client, with applicable interest and damages for breach of trust and emotional distress.
2. Alternatively, **allocates the land without further delay**, and delivers all relevant documentation (survey plan, deed of assignment, allocation letter) within 14 days.
3. **Investigates and sanctions** PWAN PLUS for unethical and fraudulent land practices affecting both Nigerians and foreign nationals.
4. **Prosecutes all responsible officers** under relevant criminal provisions of the Nigerian Criminal Code and FCCPA.
5. **Blacklists PWAN PLUS and other defaulting subsidiaries** of PWAN GROUP pending restitution to defrauded victims.

ATTACHED DOCUMENTS (EVIDENCE)

1. Payment receipt of **₦2,500,000** dated 6th November 2024.
2. Transfer confirmation of **₦500,000** for development levy dated 31st May 2025.
3. WhatsApp/email/phone records of negotiation with allocation officer (if available).
4. Records of office visit and verbal agreements.

Yours faithfully,




AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



Official Address: 2nd Floor, Transcity Towers, 1, Alimosho
Park I Estate, Berger Road, Lagos State, Lagos State,
Lagos State,
Tel: 08189900916, 08189901122, 08189906129

04/06/2022 23:43

Infrastructure Receipt

Name: [REDACTED]
Address: [REDACTED]
Phone: [REDACTED]
Email: [REDACTED]

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

PAYMENT PLAN		DESCRIPTION	PAYMENT	ESTATE	REMARKS
Plot	Size	Description	Amount Paid	Unit, Per plot	Unit Total
1.00	464	Initial Payment for Infrastructure Fees for One (1) plot of land at Billionaires Garden City By Cedarwood Phase 2	500,000		500,000.00

Plot	Size	DOCUMENTATION	FEES	TOTAL FEES	
1.00	464	Plot Maintenance	60,000	60,000	
1.00	464	Development Fee	2,000,000	2,000,000	

Amount in words: Five Hundred Thousand Naira and Zero Kobo

Subtotal: 500,000.00
Sales Tax:
Total: 500,000.00

Total Amount: ₦ 2,060,000.00
Outstanding Bal: ₦ 1,560,000.00

FOR PWAN Plus Business Concerns Ltd:
Authorized Signatory:
Signature: _____
PWAN PLUS BUSINESS

Sales Receipt

Sold to:
Address:
Phone:
E-mail:

Date: November 6, 2024
 Recd: [REDACTED]

[illegible]

Amount in words:	TWO MILLION FIVE HUNDRED THOUSAND NARIA AND ZERO KOBO ONLY
------------------	--

Subtotal	2.500.000,00
Sales Tax	
Total	2.500.000,00

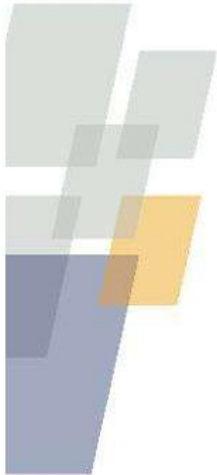
Total Amount	N	2,500,000.00
Outstanding Bal:	N	-

FOR PWAN Plus Business Concerns Ltd:

Ogunwobi Esther

Signature

**PWAN PLUS BUSINESS
CONCERNS LTD**





Transaction Receipt Successful

₦ 500,000.00

Five Hundred Thousand Naira Only

May 31, 2025 15:31:42

From:	*****86392
Sender Name:	
Beneficiary Name:	PWAN PLUS BUSINESS CONCERNS LTD CAPITAL PROJECT
Account No:	1016156361
Bank:	Zenith International Bank Plc
Transaction Type:	Interbank Transfer
Reference No:	000016250531153142000057311276
Transaction	



DEBIT

₦2,500,000.00



Transaction Type

TRANSFER

Beneficiary

PWAN PLUS BUSINESS CONCERNS LTD | 4020032842

Beneficiary Institution

Polaris Bank

Sender Name

[REDACTED]

Source Institution