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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 (BEACH HAVEN ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, CRIMINAL BREACH OF TRUST, UNLAWFUL RETENTION OF FUNDS, AND CONSPIRACY TO DEFRAUD – ₦1,500,000

We act for the Petitioner and lodge this formal complaint against **PWAN Group** and its officers for obtaining money by false pretence, fraudulent misrepresentation, criminal breach of trust, and unlawful conversion of the sum of **₦1,500,000 (One Million Five Hundred Thousand Naira)** paid towards the purchase of a plot of land at **Beach Haven Estate**, Ibeju Lekki, Lagos State.

FACTUAL BACKGROUND

1. In or around [state the year, if you wish — please confirm], our client entered into a contract with PWAN Group for the purchase of a plot of land at **Beach Haven Estate**, Ibeju Lekki, Lagos State for the agreed sum of **₦2,850,000**.

2. Relying on representations by PWAN Group's agents that the land was genuine, available for immediate allocation, and free from encumbrances, our client made an advance payment of **₦1,500,000** towards the purchase price.
3. Despite repeated follow-ups, PWAN Group has failed, neglected, and/or refused to allocate any physical plot or provide valid title documentation.
4. All efforts by our client to recover the amount paid or secure proper allocation have been frustrated by deliberate delays and false assurances by PWAN Group's representatives.
5. The conduct of PWAN Group and its agents amounts to **fraudulent misrepresentation, obtaining by false pretence, criminal breach of trust, and unlawful conversion.**

CRIMINAL OFFENCES DISCLOSED

This conduct constitutes offences contrary to Nigerian law, including but not limited to:

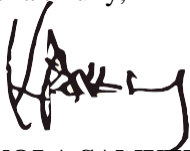
- **Advance Fee Fraud** – contrary to the Advance Fee Fraud and Other Fraud Related Offences Act, 2006;
- **Obtaining by False Pretence and Fraudulent Conversion** – contrary to the Criminal Code Act;
- **Criminal Breach of Trust** – contrary to the Criminal Code Act;
- **Unlawful Concealment and Misrepresentation** – contrary to the Federal Competition and Consumer Protection Act.

PRAYERS

Accordingly, we respectfully request that your office:

1. Investigate and prosecute PWAN Group and its relevant officers for fraud, breach of trust, and conspiracy;
2. Recover and refund the sum of **₦1,500,000** paid by our client;
3. Ensure restitution for our client and protect other members of the public from similar fraudulent conduct;
4. Take further regulatory action as may be necessary.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



No 10, Road 7, Lekki County Homes,
Ikota Villa, Lekki Epe Expressway, Lagos State
☎ +234-7026000037, +234-9060004376

3rd September, 2020

Y. T. [REDACTED] &
[REDACTED] state,
[REDACTED] Lagos.

Dear Ma,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦1,500,000.00 (One Million, Five Hundred Thousand Naira)** Only, being part-payment for **One (1) Residential Plot** measuring **450sqm** of land, in **BEACH HAVEN ESTATE** situated at **Lepia Community, Lekki Free Trade Zone , Ibeju-Lekki L.G.A, Lagos State.**

Please find below the description of the Land you are purchasing:

LOCATION: Lepia Community, Lekki Free Trade Zone, Ibeju-Lekki L.G.A, Lagos State.

TYPE/SIZE: One (1) Residential Plot of undeveloped parcel of land measuring 450sqm.

TITLE: Excision NO (LS/D/BK102), Registered Survey, Deed of Assignment.

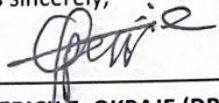
The total cost of the plot as at the date of this payment is **₦2, 850,000.00 (Two Million, Eight Hundred & Fifty Thousand Naira)** only, for a Three Months Outright Payment Plan.

The expected balance is **₦1, 350,000.00 (One Million, Three Hundred & Fifty Thousand Naira)** Only.

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

Thank you very much for subscribing to **BEACH HAVEN ESTATE** through **PWAN Haven Investments & Realtors Ltd.**

Yours sincerely,



FREDERICK E. OKPAJE (DR.)
Managing Director.

| Payment Method | | Reconciling Bank | Estate | DURATION | |
|---------------------------|---------|---|--------------|----------|--------------|
| INITIAL | | ZENITH BANK | BEACH HAVEN | 3MONTHS | |
| ONE (1) RESIDENTIAL PLOT. | | | | | |
| Qty | Size # | Description | Unit Price | Discount | Line Total |
| 1.00 | 450 Sqm | Initial Payment for One (1) Residential Plot of Land at BEACH HAVEN ESTATE located at Lepia Community, Ibeju Lekki. | 1,500,000.00 | | 1,500,000.00 |
| | | Outstanding Balance | 1,350,000.00 | | |

