ELUYEFA CHAMBERS



No. 22 Admiralty Way, Lekki Phase 1

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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 FOR FRAUDULENT LAND SALE AND NON-ALLOCATION – \$\frac{1}{2}3,000,000 \text{ TOTAL LOSS}\$

We write to formally petition **PWAN GROUP** over fraudulent real estate practices involving the collection of substantial funds from our client without fulfilling the contractual obligation of land allocation. To date, **no land has been allocated**, and **no refund** has been issued, despite the client completing over 83% of the payment for the said property.

FACTS OF THE CASE

- Our client made a substantial payment of \$\frac{\text{N13,000,000.00}}{\text{treen Million Naira}}\$ to PWAN GROUP as part of the agreed sum for a residential plot of land measuring 450sqm at The Palms Residences, Abuja FCT, located at Lugbe, Opposite Shoprite, Abuja FCT.
- The **total cost** of the plot was ₹18,000,000.00 under a six-month installment scheme.
- Following the ¥13,000,000.00 payment, our client was issued a **Letter of Acknowledgment**, confirming receipt and clearly stating that the **outstanding balance** was **₹3,000,000.00**.
- However, despite this formal acknowledgment and the significant amount already paid, **no plot of land has** been allocated, and **no contract of sale, allocation letter, or title documents** have been issued to date.
- The remaining balance of ₹3,000,000.00 was pending, yet PWAN has made **no effort to initiate allocation**, Page **1** of **7**

and has **ceased communication** with the client.

• The failure to allocate the land even after collecting such a large sum, coupled with the absence of any explanation or refund, constitutes a **clear case of real estate fraud**, **breach of trust**, and **intentional misrepresentation**.

APPLICABLE LEGAL BREACHES

The actions of PWAN GROUP and its agents amount to the following:

- Advance Fee Fraud Section 419 of the Nigerian Criminal Code
- Criminal Breach of Trust Section 312
- Obtaining Property by False Pretence
- Misrepresentation and Deceptive Marketing Section 14, FCCPA (2019)
- **Breach of Contract** For failure to deliver or begin the allocation process after receiving payment

RELIEFS SOUGHT

We respectfully request the intervention of the appropriate investigative and prosecutorial authorities to:

- Investigate the promoters and agents behind The Palms Residences Abuja scheme under PWAN GROUP.
- 2. **Compel immediate allocation** of the promised 450sqm residential plot at The Palms Residences, Abuja, with all due documentation.
- 3. In the alternative, **order a refund of №13,000,000.00**, along with **interest, damages**, and applicable **statutory penalties**.
- 4. **Prosecute all culpable parties** found to have acted fraudulently, and impose relevant sanctions.

ATTACHED DOCUMENTS

- Letter of Acknowledgment issued by PWAN GROUP for ₹13,000,000.00
- Any available payment receipts and proof of transaction
- Correspondences (if any) evidencing follow-up or inquiries regarding allocation

Yours faithfully,

AKINOLA SAMUEL ELUYEFA ESO

Principal Partner/Investor Partner

ELUYEFA CHAMBERS



OFFICE: Km42. lekki-Epe Expresswav Opposite Children's Place Plaza. By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos Tel: +234-8180000652, +234-8180000637 Email: pwanmaxproperties@gmail.com



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				The Palms	
				Residences Abuja-	
Outright		Fidelity Bank Plc	1	Fct	6Mths
			•		•
Description					Line Total
Being Further payment for O	ne(1)plot of Land at The Pa	lms Residences Abuja-Fct			₦ 13,000,000.00
Amount in words: Thirt	een Million Naira and Zero	Kobo		Subtotal	№ 13,000,000.00
Amount in words: Thirt	een Million Naira and Zero	Kobo		Subtotal Tax	.,,
Amount in words: Thirt	een Million Naira and Zero	Kobo			№ 0.00
Amount in words: Thirt Additional Information;	een Million Naira and Zero	Ково		Tax	N 0.00
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Additional Information;				Tax	N 0.00

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OFFICE: Km42. lekki-Epe Expresswav Opposite Children's Place Plaz: By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos Tel: +234-8180000652 +234-8180000637

Email: pwanmaxproperties@gmail.com



Date: Receipt #: File #: Comment: Jan 31, 2022 FIDELITY/2022/0001 PMX/TPRA/2022/000030

Payment Method	Reconciling Bank	Quantity	Estate	Duration
			The Palms	
			Residences Abuja-	
Outright	Fidelity Bank Plc	1	Fct	6Mths

Description			Line Total
Being Initial payment for One(1)plot of Land at The Palms Residences Abuja-Fct		ouja-Fct N 2,000,000.0	
Amount in words: Two	Million Naira and Zero Kobo	Subtotal	₦ 2,000,000.00
		Tax	№ 0.00
		Total	№ 2,000,000.00
Additional Information;			
Total Amount:	№ 18,000,000.00		
Outstanding Balance:	№ 16,000,000.00		
Size per Plot:	450sqm		

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OJ AND MARC BUSINESS COMPLEX, KM 42 LEKKI EPE EXPRESSWAY, OPPOSITE CHILDRENS PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS

6 08180000652, 07064000761,

APRIL 13, 2022.



Dear Sir/Ma,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of \$\mathbb{A}13, 000,000.00 (Thirteen Million Naira) only, being further- payment for One (1) Residential plot of land measuring 450sqm at The Palms Residences Abuja FCT, Situated at Lugbe Opposite Shoprite FCT Abuja.

The total cost of the plot as at the date of this payment is \$\frac{\pma18}{2}\$18, 000,000.00(Eighteen Million Naira) only, for Six months scheme.

The expected balance is ≥3, 000,000.00(Three Million Naira) only.

You are expected to pay ≥1, 500,000.00(One Million, Five Hundred Thousand Naira) monthly, before the end Two months starting from the month of June 2022, which is to offset the remaining balance of ≥3, 000,000.00(Three Million Naira)

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

Thank you very much for subscribing to THE PALMS RESIDENCES through PWAN Max Property and Business Solution.

Yours sincerely,

NWAIGWE FRANKLIN General Manager

FOR: PWAN Max Property and Business Solution

www.pwanmax.com

info@pwanmax.com, pwanmaxproperties@gmail.com

...making home ownership dream a reality



OJ AND MARC BUSINESS COMPLEX, KM 42 LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS

08180000652, 07064000761,

JANUARY 31st, 2022



Dear Sir/Ma,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of ≥2,000,000.00 (Two Million Naira) only, being initial- payment for One (1) Residential Plot of land measuring 450Sqm, in Palm Residence FCT Abuja, Located at Lugbe Opposite Shoprite F.C.T Abuja.

The total cost of the plot as at the date of this payment is **\(\pm\)18, 000, 000.00 (Eighteen Million Naira)** only, for the Six months scheme.

The expected balance is ±16, 000,000.00 (Sixteen Million Naira) only.

You are expected to pay ≥ 2,666,667. 00 (Two Million, Six Hundred and Sixty Six Thousand, Six Hundred and Sixty Seven Naira) monthly, before the end of Six Months starting from the month of February 2022, which is to offset the remaining balance of ≥16,000,000.00 (Sixteen Million Naira) only

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

Thank you very much for subscribing to PALMS RESIDENCES ABUJA-FCT through PWAN Max Property and Business Solution.

Yours sincerely,

Nwaigwe Franklin

Business Development Manager

FOR: PWAN Max Property and Business Solution



 OJ AND MARC BUSINESS COMPLEX, KM 42 LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS

OB180000652, 07064000761,

11th March, 2023



Dear Esteemed Client.

IN RE - PALMS RESIDENCE ESTATE, LUGBE, FCT-ABUJA

NOTICE OF OUTSTANDING PAYMENT IN THE SUM OF: № 3,000,000.00 (THREE MILLION NAIRA) ONLY BEING PAYMENT TO BE MADE FOR THE TOTAL PURCHASE PRICE FOR THE PALMS RESIDENCES ESTATE IN THE SUM OF №18,000,000.00 (EIGHTEEN MILLION NAIRA) ONLY

We refer to the above subject matter.

Sequel to our recent documentation review regarding your subscription to The Palms Residences Estate situate and lying at **Lugbe opposite Shoprite F.C.T Abuja**, and in conjunction with the communique sent on the 27th day of February, 2023 respectively, we write to hereby formally give you notice that your instalment payment period for the said estate has since expired on the 31st day of July 2022 of which same obligation is yet to be fulfilled us till date.

On this note, kindly find below the details of your subscription via a form as filled and signed on the 31^{st} day of January 2022 for your ease of reference

- Date of subscription: 31st January 2022
- 2. Scope of subscription: One (1) plot of 450sqm each
- 3. Price: N18,000,000.00 (EIGHTEEN MILLION NAIRA) Only
- Payment plan: 6 Months payment plan (31st January 2022 31st July 2022)
- Amount paid: №15,000,000.00 (Fifteen Million Naira) Only
- 6. Outstanding sum: N3,000,000.00 (Three Million Naira) Only

Given the above and in line with the content of the update letter as sent on the 27th day of February, 2023, we are of the belief that you are still desirous of securing the ownership of the said One (1) plot in this Estate and of which same is our intention that you enjoy the peaceable possession of this estate. To this end, we have decided to extend our hands of gratitude and appreciation to yourself, for trusting, believing and remaining with us as our well esteemed client through the unfortunate mishap of this estate which such issues have now been resolved. In this vein, we are giving a window period for your continued payment of this outstanding payment until the 31st day of March, 2023.

In this vein, do kindly **TAKE NOTE** that in the event that the outstanding sum is not yet fulfilled after the **31st day of March**, **2023**, we shall be constrained to review the continued ownership of slot on your behalf, and we shall be made to re-allocate you to such other estate of our choice or be made to pay the new current market price value of **N45,000,000.00 (Forty-five Million Naira)** Only per plot in the Estate.

Kindly make the payment to the account details as follows:

ACCOUNT NUMBER: 4011420133

ACCOUNT NAME: PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LIMITED.

BANK: FIDELITY BANK

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info@manmay.com_manmayenoperties@email.com