



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 (OAK HAVEN ESTATE, IBEJU-LEKKI) FOR FRAUD,
NON-ALLOCATION, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD
– ₦2,800,000**

We are solicitors to the Petitioner, hereinafter referred to as “*our client*,” and on their behalf, we respectfully submit this formal criminal complaint against **PWAN Group**, and its subsidiary responsible for the management and sale of **Oak Haven Estate**, Ibeju-Lekki, Lagos State.

FACTUAL SUMMARY

1. Our client subscribed to one (1) residential plot at **Oak Haven Estate**, Ibeju-Lekki, Lagos State, with a total agreed price of **₦2,800,000 (Two Million, Eight Hundred Thousand Naira)** which was paid in full through an instalment plan.
2. Despite the completion of all instalment payments, **no physical allocation has been done**, and our client has not received any valid land documentation to confirm ownership.

3. Multiple follow-up attempts have yielded no concrete outcome. PWAN representatives continue to give excuses without fulfilling their contractual obligation to allocate the plot or issue the agreed documents.
4. This long-standing delay has caused our client significant financial loss, hardship, and uncertainty regarding their investment.

CRIMINAL OFFENCES DISCLOSED

The conduct of PWAN Group and its responsible agents discloses multiple violations of Nigerian criminal and consumer protection laws, including:

- **Advance Fee Fraud and Obtaining by False Pretence** – 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;
- **Unfair Business Practices and Misrepresentation** – contrary to Section 14 of the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- **Cheating** – contrary to Section 421 of the Penal Code (where applicable).

PRAYERS

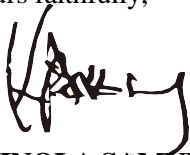
In view of the foregoing, we respectfully request the following reliefs:

1. That your office commences an immediate criminal investigation into the actions of PWAN Group and its responsible officers regarding Oak Haven Estate, Ibeju-Lekki.
2. That all persons found culpable for fraud, misrepresentation, or breach of trust be prosecuted accordingly.
3. That PWAN Group be compelled to either:
 - Allocate the fully paid-for plot to our client without any further delay; **or**
 - Refund the total sum of **₦2,800,000** with applicable interest and damages for hardship, stress, and wasted time.
4. That appropriate regulatory sanctions be imposed to stop PWAN Group from selling or advertising further unallocated plots until all pending obligations are fully discharged.

Our client is ready to present all payment receipts, instalment evidence, and any supporting communication to facilitate your investigation and enforcement.

Thank you for your urgent attention to this complaint.

Yours faithfully,




AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner


ELUYEFA CHAMBERS

On behalf of the alleged petitioner

info@pwanhaven.com, pwanhaven@gmail.com | www.pwanhaven.com
...making home ownership dream a reality.

**PWAN
HAVEN**
Providing HOME ownership and investment opportunity

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

Sold to: 

Date: May 20, 2019
Receipt #: 2019/001
File #: PWHV/OAK/2019/0265

Order Method	Reconciling Bank	Balance	Duration
INITIAL	ZENITH BANK	OAK HAVEN	12MONTHS

Qty	Size	Description	Unit Price	Discount	Line Total
1.00	600 Sqm	Initial Payment for One (1) Residential Plot of Land at OAK HAVEN ESTATE located Agan Offran Village, Ibeju-Lekki.	100,000.00		100,000.00
Outstanding Balance			2,700,000.00		