



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 EDGE (HAVILLAH GARDENS SCHEME 2, IBEJU-LEKKI, LAGOS) FOR FRAUD, NON-ALLOCATION, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦1,350,000

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 EDGE**, a subsidiary of **PWAN Group**, for acts constituting fraud, non-allocation of land, criminal breach of trust, and conspiracy to defraud.

FACTUAL SUMMARY

1. In **2016**, our client purchased **two (2)** residential plots of land at **Havillah Gardens Scheme 2**, Ibeju-Lekki, Lagos State, from **PWAN EDGE** at a total cost of **₦1,350,000** (One Million, Three Hundred and Fifty Thousand Naira).

2. The total payment covered the cost of the land and associated fees, including survey, corner piece, and deed of assignment.
3. Despite the passage of over **eight (8) years**, PWAN EDGE has failed and refused to allocate the plots or provide valid land documentation to our client.
4. Our client resides outside Nigeria, making consistent communication with the company especially difficult. Numerous follow-up attempts have not produced any positive outcome.
5. Our client has attached all relevant receipts and documents as proof of the transaction.

CRIMINAL OFFENCES DISCLOSED

The actions of PWAN EDGE and its responsible officers disclose multiple breaches 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 Conduct 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 light of the foregoing, we respectfully seek the following reliefs:

1. That your office immediately initiates a thorough criminal investigation into the conduct of PWAN EDGE and its responsible officers.
2. That prosecution be commenced against any individuals found culpable for fraud, misrepresentation, and criminal breach of trust.
3. That PWAN EDGE be compelled to either:
 - Allocate the two (2) plots of land at Havillah Gardens Scheme 2 to our client forthwith; **or**
 - Refund the total sum of ₦1,350,000 with applicable interest and compensation for the prolonged delay.
4. That the company be ordered to compensate our client for the financial hardship, emotional distress, and lost investment opportunities suffered over the years.
5. That relevant regulatory and enforcement bodies put in place strict monitoring to ensure PWAN EDGE fulfils all pending obligations before further land sales are permitted.

We are ready to submit all supporting documents, including payment receipts and correspondence, and shall cooperate fully with your office throughout the investigation and enforcement process.

Thank you for your urgent attention to this complaint.

Yours faithfully,



11th October, 2016

[REDACTED]
[REDACTED]
B/C

Dear Sir,

ALLOCATION OF PLOT(S) OF LAND AT HAVILLA GARDENS II, ELERANIGBE, IBEJU LEKKI LGA

Congratulations Sir. This is to inform you that Two (2) plots of land have been allocated to you in **Havilla Gardens Scheme 2**, being one of the Real Estate Schemes of Pwan Edge Properties & Investment Ltd, to which you subscribed. However, the physical allocation of plot(s) will commence from August 2017.

Please find the description of the Allocation below:

- **LOCATION:** Eleranigbe Ibeju Lekki Area of Lagos State.
- **SIZE:** Two (2) plots of undeveloped land measuring 600sqm each.
- **STATUS:** Undeveloped parcel of Land.
- **ALLOCATION DATE:** From August, 2017

Kindly pay the sum of ₦50, 000 per plot for the **Provisional Survey Plan** in your name and ₦20, 000 per plot for **Plot Demarcation Fee** (4 Corner Piece) into our Zenith Bank Account. Account Name: **Pwan Edge Properties and Investment Limited (Projects)** & Account Number: **1014747262**.

After payment, a copy of your Provisional Survey Plan with the full details of your plots will be made available to you on or before the physical allocation of plot(s).

We would advise you on the cost for production of your Deed of Assignment at a later date.



CONTRACT OF SALE

BETWEEN

**PWAN EDGE PROPERTIES AND
INVESTMENT LTD**

(THE VENDOR)

AND




IN RESPECT OF TWO (2) PLOTS OF LAND AT HAVILLA GARDENS
(SCHEME 2) SITUATE AT IDIKASU/ALARO COMMUNITY NEAR
AJEGBEMIWA, ELERANIGBE IN IBEJU-LEKKI LOCAL GOVERNMENT
AREA OF LAGOS STATE.

THIS AGREEMENT is made this 28TH day of OCTOBER 2016

BETWEEN

PWAN EDGE PROPERTIES AND INVESTMENT LTD - a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its Head Office at **KM 42 Lekki Epe Expressway, Alfa Bus Stop, Opposite Children's Place Plaza Sangotedo, Lekki, Lagos, Nigeria** (hereinafter referred to as '**THE VENDOR**' which expression shall where the context so admits include its legal representatives, successors-in-title and assigns) of the one part.

AND

 hereinafter referred to as '**THE PURCHASER**' which expression shall where the context so admits include her heirs, personal representatives and assigns) of the other part.

WHEREAS:

1. The Vendor is a real estate Marketing, Investment, Management and Development Company engaged in the acquisition of tracts of land and development of estates which are laid out into schemes and gated estates and are thereafter allocated to subscribers to the Schemes.
2. The Vendor has acquired a vast tract of land measuring over 20 acres situate and described as **Havilla Gardens Scheme 2** at Idikasu/Alaro Community, Eleranigbe in Ibeju-Lekki Local Government Area of Lagos State.
3. The Vendor with intent to achieve its object of development of Schemes has procured **Havilla Gardens Scheme 2** hereinafter referred as the **Scheme** whereby

3. The Vendor with intent to achieve its object of development of Schemes has procured **Havilla Gardens Scheme 2** hereinafter referred as the **Scheme** whereby interested person(s) or organization(s) subscribe(s) to the Scheme by way of monthly, quarterly contribution or outright payment towards ownership of plot(s) of land within the Scheme.
4. The Purchaser has applied to subscribe to the Scheme and the Vendor has accepted the application of the Purchaser to the Scheme.

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IT IS HEREBY AGREED that the Purchaser has fully subscribed to Two (2) Plots of land measuring 600sqm each and the Vendor shall allocate same within the Scheme to the Purchaser under the following terms and conditions:

1. The Purchaser shall pay purchase price of **₦1, 350, 000.00** (One Million, Three Hundred and Fifty Thousand Naira Only) for the full subscription of the said Plots of land which shall be paid in full before the execution of this Agreement (the receipt of which the Vendor hereby acknowledges).


- iii.) The Purchaser and Vendor hereby have a common understanding that the co-operation of both parties is required to realize the object of the Scheme.

THAT upon the execution of this Agreement, the parties hereto undertake to perform their respective obligations as stated herein.


IN WITNESS WHEREOF the Parties have executed this Agreement in the manner hereunder appearing:-

THE COMMON SEAL OF THE VENDOR
PWAN EDGE PROPERTIES AND INVESTMENT LTD
Is hereto affixed:

In the Presence of:



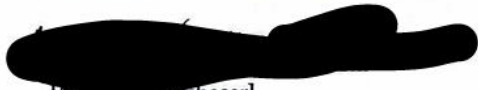
DIRECTOR

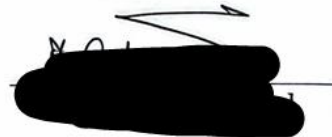


SECRETARY



SIGNED, SEALED AND DELIVERED
By the within named Purchaser


[Name of Purchaser]



In the Presence of:

Name: 

Designation: 

Address: 