

**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](mailto: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](mailto:info@pwangroup.com), [pwanpronigeria@gmail.com](mailto:pwanpronigeria@gmail.com)

**PETITION AGAINST PWAN HOMES LTD FOR FAILURE TO DELIVER LAND  
ALLOCATION AT LEKKI VILLA ESTATE, IDOGUN-ORISAFUNWA, IBEJU-LEKKI –  
TOTAL AMOUNT ₦1,500,000  
(Submitted on behalf of the Estate of the Late Mr. [REDACTED])**

We write to formally lodge a petition against PWAN Homes Ltd for fraudulent misrepresentation and failure to allocate land as contracted and paid for by the late Mr. [REDACTED] (hereinafter “the deceased”), now represented by the undersigned **petitioner on behalf of the estate of the deceased** in accordance with applicable legal principles under Nigerian law.

**FACTS OF THE CASE:**

- On or about **2021**, the late Mr. [REDACTED] paid the sum of **₦1,500,000 (One Million Five Hundred Thousand Naira)** to **PWAN Homes Ltd** for the purchase of **one (1) plot of land** located at **Lekki Villa Estate, Idogun-Orisafunwa, near Igbojiya, via Bogije, Ibeju-Lekki, Lagos State**.
- PWAN Homes Ltd issued an **allocation letter dated 10th June 2024**, which was presumed to confirm the physical allocation of the plot.
- Despite this letter and several attempts made by representatives and family members of the deceased to follow up on the matter, **no physical allocation or access to the land has been granted to date**.

- The deceased passed away before receiving the benefit of the land he fully paid for. His surviving family has since been subjected to emotional and financial hardship, while their lawful entitlements have been ignored by PWAN Homes Ltd.
- Multiple attempts to obtain either the land or a refund from the company have proven futile.

## ALLEGED OFFENSES:

The conduct of PWAN Homes Ltd amounts to:

- **Breach of Contract:** The company has failed to fulfill its contractual obligation to deliver physical possession of the property despite full payment and issuance of an allocation letter.
- **Fraudulent Misrepresentation:** The company falsely assured allocation which was never effected, thereby inducing payment under false pretenses.
- **Obtaining Money by False Pretenses:** This conduct potentially falls under Sections 419 and 323 of the Nigerian Criminal Code and/or relevant provisions of the Administration of Criminal Justice Act.
- **Unlawful Withholding of Property:** Retaining control over the land or equivalent value without cause or consent constitutes conversion and unjust enrichment.
- **Violation of Consumer Protection Laws:** The deceased and his estate were misled and denied the value of the service paid for in violation of the Federal Competition and Consumer Protection Act.

## RELIEFS SOUGHT:

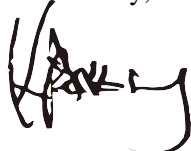
We respectfully request that your esteemed office:

1. Conduct a full **investigation** into the conduct of PWAN Homes Ltd concerning the sale of land at **Lekki Villa Estate, Idogun-Orisafunwa**.
2. **Compel immediate allocation** of the said plot to the estate of the deceased or provide a suitable alternative of equal or higher value within the same axis.
3. In the alternative, **mandate a full refund** of **₦1,500,000**, with **accrued interest and compensation** for hardship, inconvenience, and emotional distress suffered by the family and beneficiaries of the deceased.
4. Take **appropriate civil, regulatory, or criminal action** to ensure justice is served and future fraudulent activity by the company is deterred.

Submitted on behalf of:

The Estate of Late 

Yours faithfully,

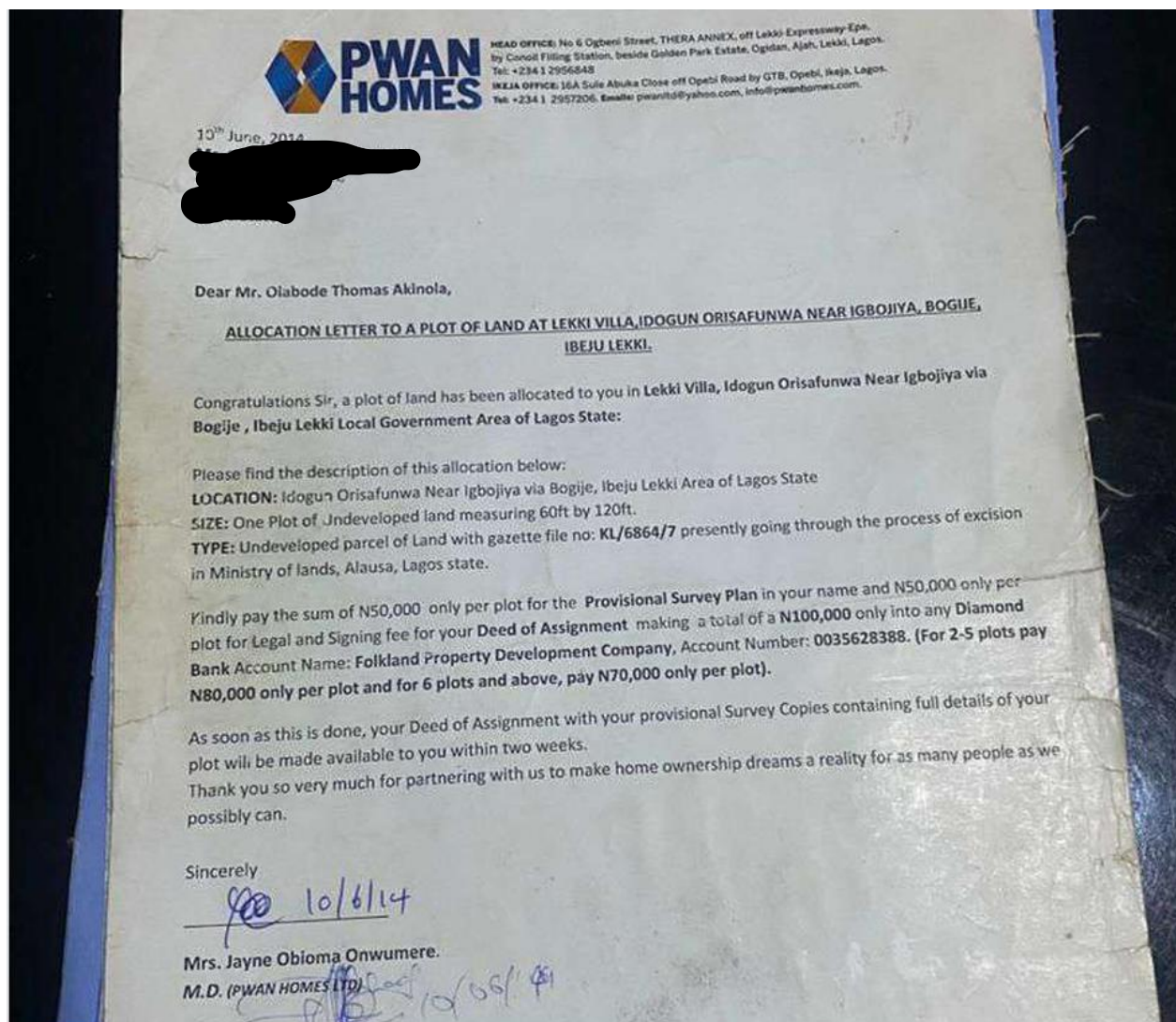


**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the Alleged Petitioner*





FOLKLAND PROPERTY DEVELOPMENT COMPANY LTD.

RECEIVED FROM:

OFFICIAL RECEIPT

PAYMENT DATE: 22/05/14

Phone:

The Sum of: One hundred thousand Naira only.

Being Payment for: Provisional survey plan and Deed of Assignment for one plot of undeveloped land, located at Lekki Villas Estate, in Igbogiya, Bogije, Ibeju-Lekki L.G.A, Lagos State.

Amount (N) 100,000

Balance(N) 0.00



For: Folkland Property Development Co

Client's Sign./ Date

Thanks for your patronage !





**PWAN  
HOMES**  
...making home ownership dreams a reality

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

Sold to:

[Redacted]

Sales Receipt

Date:

May 13, 2014

Receipt #:

File #:

[Redacted]

Payment: N1,000,000.00

Accounting Bank

Land Location

Lekki Villa Estate

Qty	Size	Description	Amount	Discount	Line Total
1.00	675 Sqm	Full Payment for one plot of land at Lekki Villa Estate.	1,500,000.00		1,500,000.00

Amount in words: One Million, Five Hundred Thousand Naira Only

Total Discount



FOR PWAN HOMES LTD:

Signature

Received By:

Signature