



**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 REAL ESTATE FOR FAILURE TO ALLOCATE LAND AFTER PAYMENT OF ₦2.7 MILLION**

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally petition **PWAN Real Estate Company** for **fraudulent misrepresentation, breach of contract, and financial exploitation** regarding the purchase of a plot of land that has remained unallocated for several years.

### **FACTS OF THE CASE:**

In **2018**, the petitioner was approached by one **Miss Ifeoma Dim**, who was then a sales representative of **PWAN Real Estate Company**. Based on her persuasion and the promises made by PWAN, the petitioner decided to purchase **one plot of land** through their installment payment option.

The petitioner fully paid the sum of **₦2,000,000 (Two Million Naira)** for the land and made additional payments amounting to **₦700,000 for maintenance and allocation fees**, totalling **₦2,700,000 (Two Million, Seven Hundred Thousand Naira)**.

Despite fulfilling all financial obligations, **PWAN has failed to allocate any land** to the petitioner.

Repeated attempts to reach the company have been met with:

- **Unending referrals to various phone lines,**
- **Contradictory stories, and**

- **Total lack of accountability.**

This continued neglect has caused the petitioner both **financial hardship** and **emotional distress**, while the company continues to operate with impunity.

### **APPLICABLE LEGAL BREACHES:**

The actions of PWAN Real Estate Company are in breach of:

- **Section 419 of the Criminal Code Act** – *Obtaining money by false pretences.*
- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – *Criminal breach of trust.*
- **Consumer Protection Frameworks** – including the right to transparent, fair, and timely service.

### **RELIEFS SOUGHT:**

We respectfully request that your office:

1. **Investigate the conduct of PWAN Real Estate Company** and their agent, Miss Ifeoma Dim, for breach of trust and fraud.
2. **Prosecute all responsible parties**, including company officers and marketing agents.
3. **Compel a full refund** of all monies paid by the petitioner (₦2,700,000), or
4. **Enforce immediate allocation** of the land as contractually agreed.
5. Institute measures to **safeguard other investors and buyers** from such ongoing deceit.

### **ATTACHED DOCUMENTS:**

- Proof of payment receipts
- Any written agreements or promotional materials
- Communication records with PWAN or its representatives

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**  
*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*



Road 5, Shop 1 307/308, Beside Stanbic IBTC Bank Plc, Ikota  
Shopping Complex, Ajah, Lagos.  
Tel: +234909999835, +2347030449696  
Email: pwanplus@gmail.com

Sold To  
Address

Date issued	5/7/2018
Transaction date	26/6/2018
Transaction type	Transfer GTB
Currency	NGN (N)
Duration	12 Months
Estate	CedarWood Villas
Total Price	2,000,000.00
Previous Bal.	900,000.00
Amount paid	200,000.00
Current Bal.	700,000.00
Plot type	Residential
Remark	Instalment

### PAYMENT RECEIPT

Payment method	Client code	Description	Amount(N)
Instalment		Being 6th payment for (1) One plot of land at CedarWood Villas	200,000.00

AMOUNT IN WORDS: Two Hundred Thousand Naira Only

200,000.00

You are expected to pay the sum of N700, 000.00 (Seven Hundred Thousand Naira) only within 8 months, starting from the month of July, 2018.

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

PWAN PLUS BUSINESS



Road 5, Shop 1 307/308, Beside Stanbic IBTC Bank Plc, Ikota  
Shopping Complex, Ajah, Lagos.  
Tel: +234909999835, +2347030449696  
Email: pwanplus@gmail.com

Sold To  
Address

Date issued	5/7/2018
Transaction date	27/7/2018
Transaction type	Transfer GTB
Currency	NGN (N)
Duration	12 Months
Estate	CedarWood Villas
Total Price	2,000,000.00
Previous Bal.	0.00
Amount paid	300,000.00
Current Bal.	1,700,000.00
Plot type	Residential
Remark	Instalment

### PAYMENT RECEIPT

Payment method	Client code	Description	Amount(N)
Instalment		Being 7th payment for (1) One plot of land at CedarWood Villas	300,000.00

AMOUNT IN WORDS: Three Hundred Thousand Naira Only

You are expected to pay the sum of N1, 700, 000.00 (One Million Seven Hundred Thousand Naira) only within 12 months, starting from the month of March, 2018.

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



Simon Loure, B  
ACCOUNTANT

—your dream land is our priority

**PWANPLUS BUSINESS CONCERNS LTD**  
Road 5, Shop 1307/308, Beside Stanbic BHC Bank Plc, Ikota Shopping Complex, Ajah, Lagos.  
Tel: +234999999835, +2347030449696  
Email: pwanplus@gmail.com

Sold To  
Address

Date issued: 22/6/2018  
Transaction date: 22/6/2018  
Transaction type: Transfer CTH  
Currency: NGN (N)  
Duration: 12 Months  
Estate: CedarWood Villas  
Total Price: 2,000,000.00  
Previous Bal: 1,700,000.00  
Amount paid: 200,000.00  
Current Bal: 1,500,000.00  
Plot type: Residential  
Remark: Instalment

**PAYMENT RECEIPT**

Payment method	Client code	Description	Amount (N)
Instalment		Being 5th payment for (1) One plot of land at CedarWood Villas	200,000.00
			<b>200,000.00</b>

AMOUNT IN WORDS: Two Hundred Thousand Naira Only

You are expected to pay the sum of N1,500,000.00 (One Million Five Hundred Thousand Naira) only within 11 months, starting from the month of April, 2018.  
(Note that any default in payment shall attract extra charges).

Stamp: 09 MAR 2018  
ACCIDENTAL  
SIGNED: [Signature]  
ACCOUNTANT

--your dream land is our priority

**PWANPLUS BUSINESS CONCERNS LTD**  
Road 5, Shop 1307/308, Beside Stanbic BHC Bank Plc, Ikota Shopping Complex, Ajah, Lagos.  
Tel: +234999999835, +2347030449696  
Email: pwanplus@gmail.com

Sold To  
Address

Date issued: 22/6/2018  
Transaction date: 22/6/2018  
Transaction type: Transfer CTH  
Currency: NGN (N)  
Duration: 12 Months  
Estate: CedarWood Villas  
Total Price: 2,000,000.00  
Previous Bal: 1,700,000.00  
Amount paid: 200,000.00  
Current Bal: 900,000.00  
Plot type: Residential  
Remark: Instalment

**PAYMENT RECEIPT**

Payment method	Client code	Description	Amount (N)
Instalment		Being 5th payment for (1) One plot of land at CedarWood Villas	200,000.00
			<b>200,000.00</b>

AMOUNT IN WORDS: Two Hundred Thousand Naira Only

the sum of N900, 000.00 (Nine Hundred Thousand Naira)



Head 5, Shop 1 307/008, Beside Stanbic IBTC Bank Plc, Ikota Shopping Complex, Ajah, Lagos.  
Tel: +2349099999835, +2347030449696  
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Sold To  
Address

Date issued	29/5/2018
Transaction date	8/5/2018
Transaction type	Transfer GTB
Currency	NGN (N)
Duration	12 Months
Estate	CedarWood Villas
Total Price	2,000,000.00
Previous Bal.	1,400,000.00
Amount paid	500,000.00
Current Bal.	1,100,000.00
Plot type	Residential
Remark	Instalment

### PAYMENT RECEIPT

Payment method	Client code	Description	Amount (N)
Instalment		Being 4th payment for (1) One plot of land at CedarWood Villas	300,000.00

AMOUNT IN WORDS: Three Hundred Thousand Naira Only

You are expected to pay the sum of N1, 100, 000.00 (One Million One Hundred Thousand Naira) only within 9 months, starting from the month of June, 2018.

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



Simon Umar, II  
ACCOUNTANT



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Tel: +2349099999835, +2347030449696  
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Sold To  
Address

Date issued	20/4/2018
Transaction date	28/3/2018
Transaction type	Transfer GTB
Currency	NGN (N)
Duration	12 Months
Estate	CedarWood Villas
Total Price	2,000,000.00
Previous Bal.	1,500,000.00
Amount paid	100,000.00
Current Bal.	1,400,000.00
Plot type	Residential
Remark	Instalment

### PAYMENT RECEIPT

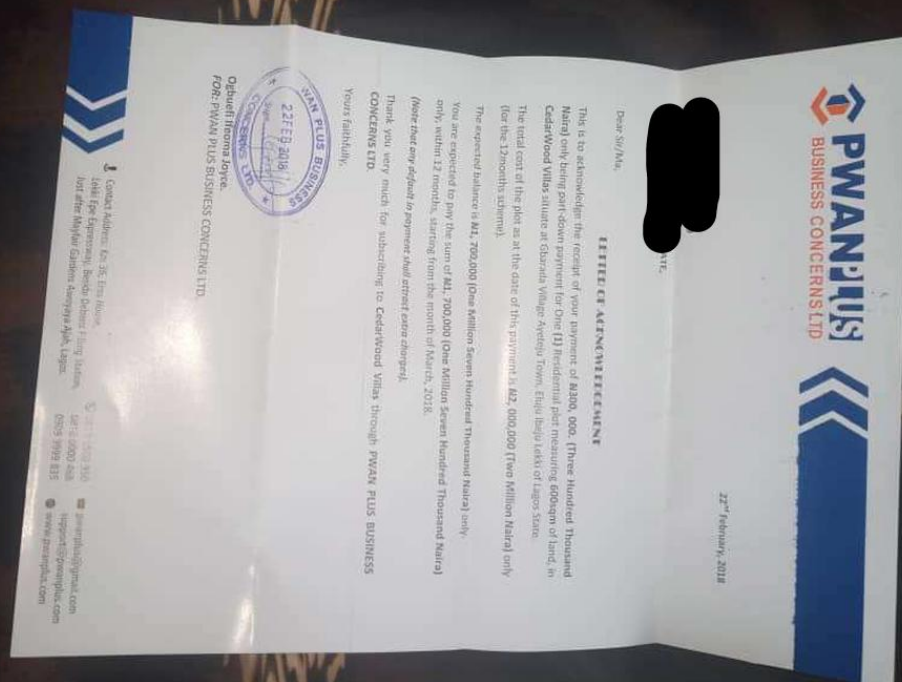
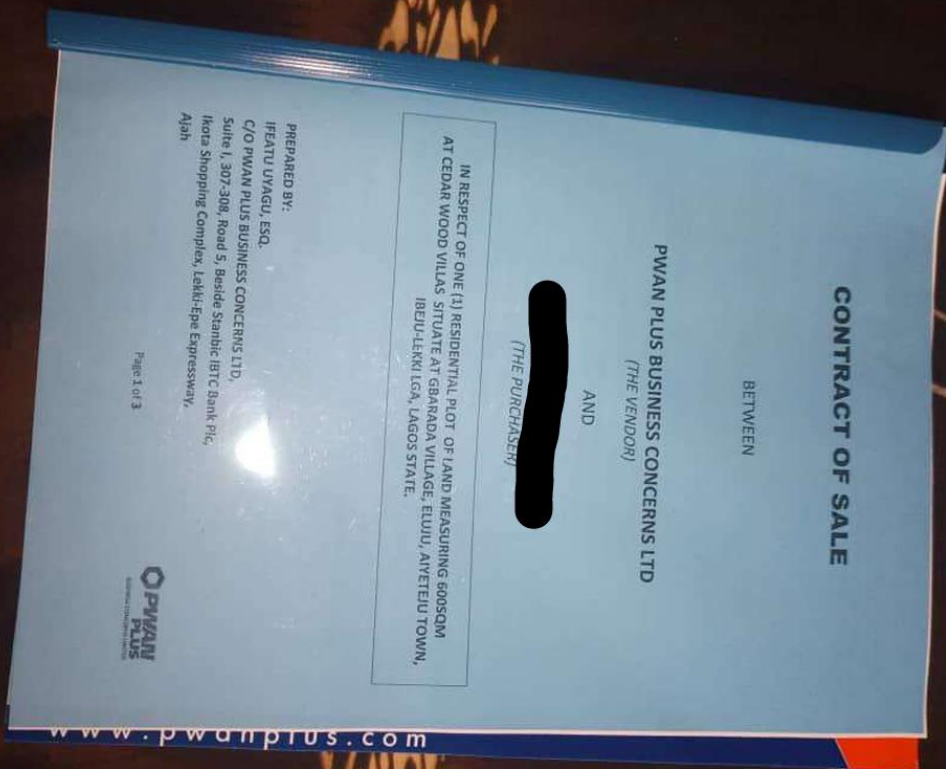
Payment method	Client code	Description	Amount (N)
Instalment		Being 2nd payment for (1) One plot of land at CedarWood Villas	100,000.00

AMOUNT IN WORDS: One Hundred Thousand Naira Only

You are expected to pay the sum of N1, 400, 000.00 (One Million Four Hundred Thousand Naira) only within 10 months, starting from the month of May, 2018.

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







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Email: pwanplus@gmail.com

Sold To  
Address

Date issued	2/10/2018
Transaction date	27/9/2018
Transaction type	Transfer GTB
Currency	NGN (N)
Duration	Final payment
Estate	CedarWood Villas
Total Price	2,000,000.00
Previous Bal.	200,000.00
Amount paid	200,000.00
Current Bal.	0.00
Plot type	Residential
Remark	Final payment

### PAYMENT RECEIPT

Payment method	Client code	Description	Amount(N)
Final payment		Being Final payment for (1) One plot of land at CedarWood Villas	200,000.00

200,000.00

AMOUNT IN WORDS: Two Hundred Thousand Naira Only