



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 FAILURE TO ALLOCATE LAND

AFTER PAYMENT OF ₦8,950,000.00 (EIGHT MILLION, NINE HUNDRED AND FIFTY THOUSAND NAIRA ONLY)

We write on behalf of our client (hereinafter referred to as “**the petitioner**”) to formally petition **PWAN Group**, over its failure to fulfill contractual obligations in relation to a land purchase at Arepo, Ogun State, despite full payment.

FACTS OF THE CASE:

1. The petitioner expressed interest in a plot of land advertised by PWAN Group at **Arepo** and, after confirming details through a representative who visited the PWAN office on the mainland, proceeded with payment.
2. A total of **₦8,950,000.00** (Eight Million, Nine Hundred and Fifty Thousand Naira Only) was paid, broken down as follows:
 - o **₦7,000,000.00** for the land
 - o **₦1,950,000.00** for deed of assignment and development levy
3. Following the payment, the petitioner was shown the location, which had a **PWAN signboard** erected on-site.
4. PWAN later issued an email notifying of a scheduled allocation date. However, the allocation was postponed indefinitely without any further communication or rescheduling.

5. Since then, all efforts by the petitioner to obtain an update or finalise allocation have been met with silence, despite full compliance with all financial obligations.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN Group and its representatives potentially violates the following provisions under Nigerian law:

1. **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust
2. **Section 419 of the Criminal Code Act** – Obtaining property under false pretences
3. **Consumer Protection Framework** – Failure to uphold advertised terms and fair treatment of customers

RELIEFS SOUGHT:

Given the substantial financial commitment made by the petitioner, and the complete lack of allocation despite full payment, we respectfully request that your office:

1. Investigate PWAN Group and its agents for breach of contractual and legal obligations regarding land allocation.
2. Prosecute responsible individuals for alleged fraudulent practices and breach of trust.
3. Compel PWAN Group to either:
 - o Allocate the land at Arepo as originally agreed, **or**
 - o Refund the full amount of ₦8,950,000.00 with accrued interest.
4. Enforce stricter oversight to protect other buyers from similar fraudulent real estate dealings.

ATTACHED DOCUMENTS:

- Sales Receipt (₦7,000,000 land payment + ₦1,950,000 for documentation/development)
- Emails regarding allocation


We trust that this petition will receive the urgent attention it deserves in line with your mandate to enforce justice and consumer rights.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

On behalf of the Alleged Petitioner



Contact Address: 23a, Sura Mogaji Street, Off Coker Road, Ilupeju, Lagos. Tel: 08188838652,
 Whatsapp: 08188886995. Email Address: pwanprime@gmail.com

OFFICIAL RECEIPT

Payment Date:	01 August 2022
Client Name:	[REDACTED]
Amount (N):	1,950,000.00
Balance (N):	-
The sum of:	ONE MILLION, NINE HUNDRED AND FIFTY THOUSAND NAIRA ONLY

Payment Details:	PWAN PRIME GT BANK A/C
Cost (N)	Being for: 1. Deed of Assignment 2. Registered Survey Plan 3. Plot demarcation 4. Developmental Levy.
500,000.00	Deed of Assignment for One (1) Plot of undeveloped land located at Prime Gardens Estate, in Arepo, Ogun State.
350,000.00	Registered Survey Plan for One (1) Plot of undeveloped land located at Prime Gardens Estate, in Arepo, Ogun State.
100,000.00	Plot Demarcation for One (1) plot, located at Prime Gardens Estate, in Arepo, Ogun State.
1,000,000.00	Development Levy (1) Plot of undeveloped land 600sqm, located at Prime Gardens Estate, in Arepo, Ogun State.
For PWAN PRIME LTD:	ANUNIKE IFEYINWA

Thank you for your patronage!

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INVITATION FOR PHYSICAL ALLOCATION (PRIME GARDENS, AREPO)

PWAN PRIME LTD pwanprime@gmail.com

To: [REDACTED]

Dear [REDACTED],

Thank you for subscribing to **PRIME GARDENS, AREPO**. We sincerely appreciate your patronage.

You are by this notice invited for physical allocation. Below are the allocation details:

Allocation Date: Tuesday March 15, 2023

Departure Time: 9:00am Prompt (Via African Time)

Take Off Point: **PWAN PRIME OFFICE**: 23a, Sura Mogaji Street, Off Coker Road, Ilupeju, Lagos.

Kindly come along with your documentation receipts.

Thank you for choosing **PWAN PRIME INVESTMENTS & PROPERTIES LIMITED**.

Kind Regards,

Ediora Martins
Customer Relations Officer

FOR
PWAN PRIME LTD
 23A SURA MOSAJI STREET
 OFF COKER ROAD
 ILUPEJU, LAGOS.

Tel: 08188888652
 WHATSAPP: 08188886995
 FACEBOOK: **PWAN PRIME LTD**
 INSTAGRAM: @pwanprime_limited
 TWITTER: @pwanprime

