

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@pwanngroup.com, pwanpronigeria@gmail.com

PETITION AGAINST PWAN FOR FAILURE TO ALLOCATE LAND AFTER FULL PAYMENT – ₦1,080,000

We write on behalf of our client (hereinafter referred to as “the alleged petitioner”) to formally petition PWAN for breach of contract, misrepresentation, and financial misconduct in connection with the sale of a plot of land in Asaba, Delta State.

FACTS OF THE CASE:

- In 2022, the petitioner purchased **one plot of land** from PWAN in Asaba for the total sum of **₦1,080,000**.
- Despite receiving a **physical land allocation letter** and providing proof of full payment via a **transfer receipt**, no actual land has been allocated to the petitioner.
- All attempts to reach PWAN and secure allocation have been met with persistent delays and unfulfilled promises, with no tangible progress to date.

APPLICABLE LEGAL BREACHES:

The actions and inactions of PWAN potentially violate:

- **Section 419 of the Criminal Code Act** – Obtaining money or property under false pretences.
- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust.
- Relevant **consumer protection laws**, including the right to transparent service delivery and fulfillment of contractual obligations.

RELIEFS SOUGHT:

We respectfully request that your office:

1. Investigate PWAN for potential fraud and breach of contract.
2. Prosecute any individuals or corporate officers found culpable.
3. Compel a **full refund of ₦1,080,000**, or enforce immediate allocation of the plot as agreed.
4. Take necessary measures to prevent the further exploitation of consumers by the said company.

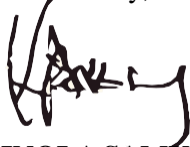
ATTACHED DOCUMENTS:

- Physical Land Allocation Letter
- Transfer Receipt

Let me know if you'd like this exported as a Word or PDF file or included in a batch report with other petitioners.

Find attached

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

Transfer Receipt 58020293 E 80:2 d 62 9M 700

Transfer Type: Internal Transfer ☒ NEFT ☐ NIP ☐ CFTS ☐

Beneficiary Name: PWAN-PRIME INVESTMENT AND PROPERTIES LIMITED

Amount: ₦ 1,080,000.00 Originating Branch: _____

Name of Sender: [REDACTED] Transaction Date: 29 08 2022
Day Month Year

Instant Transfer of Funds to other Banks Available on Internet banking and Bank 737

To register for Internet Banking, Simply Dial *737*6*5# or visit www.gtbank.com and click the register button on the Internet Banking Tab. LCFTI/FK/22102021

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PWAN PRIME 23A, Sura Mogaji Street, Off Coker Road, Ilupeju, Lagos. +234 818-888-8692, +234 818-888-8695

December 12TH, 2022

[REDACTED]

Dear Sir,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: Pearl City, Asaba

No of Plot(s): 1/464sqm

Plot Details: Block G1, Plot 1

Date of Allocation: December 16TH, 2022

PLEASE NOTE: This letter is temporary as you are expected to commence development on your plot within 6 months after your physical allocation. Failure to do that would result to reallocation of your plots to the rear part of the estate.


Therefore, the production of your Survey and Deed of Assignment will not be done until we see development on your land (**Please note that fencing of your plot is also recognized as part of development**). Kindly contact the office to request for fencing specifics.

All of these are necessary so as to drive massive development in our estate as we constantly move to achieve our vision of **"making home ownership dream a reality"**.

Subsequently, you are also responsible for the clearing of your land after allocation.

Thanking you for choosing **PWAN-PRIME INVESTMENTS AND PROPERTIES LTD.**

Yours Faithfully,


EJIOFOR MAXIMA C.
HEAD ADMIN DEPT.



ARINZE CHUKWUDUM AKONWU (MR.)
MANAGING DIRECTOR