



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 HOMES LIMITED FOR FAILURE TO ALLOCATE TWO (2) RESIDENTIAL PLOTS FULLY PAID FOR AT OAKWOOD PARK ESTATE PHASE 2, ELERANIGBE, LEKKI-EPE EXPRESSWAY, LAGOS STATE – ₦2,160,000

We write on behalf of our client (hereinafter referred to as “**the Petitioner**”) to formally petition **PWAN Homes Limited** for **fraudulent misrepresentation, breach of contract, deliberate non-allocation**, and refusal to honour their obligations regarding **two (2) residential plots of land** fully paid for at **Oakwood Park Estate Phase 2, Eleranigbe**, off the Lekki-Epe Expressway, Lagos State.

FACTUAL SUMMARY

1. In **October 2015**, the Petitioner was introduced to PWAN Homes Limited through a sales agent, **Godian Mbadiwe** (Phone: 0706 074 8048), who actively marketed **Oakwood Park Estate Phase 2, Eleranigbe**, to the Petitioner as a secure land investment.
2. Relying on these representations, the Petitioner paid for **two (2) plots of land** at the agreed rate of **₦1,080,000 (One Million, Eighty Thousand Naira)** per plot, totalling **₦2,160,000 (Two Million, One Hundred and Sixty Thousand Naira Only)**.
3. PWAN Homes Limited acknowledged the payments by issuing a Contract of Sale and receipts at the time of transaction.
4. Despite repeated requests since 2015, the Petitioner has **never been physically allocated the two plots**, making it impossible to take possession or commence any development.
5. Every attempt by the Petitioner to be shown the actual plots has been met with **unbelievable excuses** and constant deferrals.

6. Although the original Contract of Sale and receipts were lost, the Petitioner executed a sworn **Court Affidavit of Loss** and has attached a **Survey Plan** and **Statement of Account** showing clear proof of the payment made to PWAN Homes Limited.
7. Nearly **nine years** after full payment, the Petitioner remains without land, valid allocation, or any refund — resulting in substantial **financial loss, wasted time, and emotional hardship**.

ALLEGED OFFENSES

The actions of PWAN Homes Limited in this matter amount to:

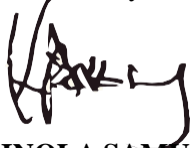
- **Breach of Contract** — for failure to allocate the plots as agreed;
- **Obtaining Money Under False Pretences** — contrary to **Section 419 of the Criminal Code Act**;
- **Criminal Breach of Trust** — contrary to **Section 312 of the Criminal Code Act, Cap C38, LFN 2004**;
- **Conspiracy to Defraud** — contrary to **Section 516 of the Criminal Code Act**;
- **Unfair Trade Practices and Misrepresentation** — in violation of the **Federal Competition and Consumer Protection Act (FCCPA), 2019**;
- **Advance Fee Fraud** — contrary to the **Advance Fee Fraud and Other Fraud Related Offences Act, 2006**.

RELIEFS SOUGHT

In view of the above, we respectfully request that your esteemed office:

1. Conduct a **full criminal investigation** into **PWAN Homes Limited**, its officers, agents, and especially the role of its sales agent, **Godian Mbadiwe**, who facilitated this transaction.
2. Compel PWAN Homes Limited to either:
 - **Immediately allocate** the two (2) fully paid-for residential plots with valid documents and physical possession; or
 - Refund the total sum of **₦2,160,000**, with accrued interest and fair compensation for nearly nine years of wasted time and emotional hardship.
3. Prosecute any individuals found to have participated in deliberate misrepresentation, misuse of funds, or fraud against the Petitioner.
4. Impose stronger **regulatory measures** to protect other unsuspecting land buyers from similar deceptive sales tactics.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner