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**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 (PWAN GROUP) FOR LAND FRAUD, NON-ALLOCATION, AND BREACH OF CONTRACT – ₦5,100,000 TOTAL MONETARY LOSS**

We write to formally petition **PWAN HOMES**, a subsidiary of the **PWAN GROUP**, for engaging in fraudulent and deceptive conduct in connection with the sale and non-allocation of land at *Ilosiwaju Gardens Estate*.

Despite receiving a total sum of **₦5,100,000** from our client on **February 26, 2024**, for the purchase of six (6) plots of land and statutory documentation fees, **PWAN HOMES has failed, refused, and/or neglected** to allocate the land or issue any valid contractual documentation to date. This conduct constitutes a calculated scheme to defraud unsuspecting buyers and has caused substantial emotional and financial hardship to the complainant.

**DETAILED FACTS OF THE CASE**

1. On **February 26, 2024**, our client purchased **six (6) plots of land** at *Ilosiwaju Gardens Estate*, at the price of **₦600,000 per plot**, amounting to a total land payment of **₦3,600,000**.
2. In addition, our client paid an extra **₦1,500,000** to cover documentation fees including **demarcation, deed of assignment, and survey**.
3. All payments were duly made into the official bank account designated by PWAN HOMES, and receipts are available.
4. Since the transaction, PWAN HOMES has failed to:
  - Allocate the six plots of land purchased,
  - Issue any contract of sale, survey plan, deed of assignment, or allocation letter,
  - Provide any clear timeline for fulfillment of these obligations.

5. Numerous calls, visits, and follow-up attempts to obtain clarification or redress from the company have been **met with deliberate avoidance, non-responsiveness, and empty assurances**, all of which now suggest a pattern of deceit.
6. The **monetary loss of ₦5,100,000**, coupled with ongoing emotional trauma and opportunity cost, has become unbearable for our client and indicates fraudulent intent, breach of fiduciary obligations, and criminal conduct under Nigerian law.

#### **APPLICABLE LEGAL BREACHES**

The conduct of **PWAN HOMES** and its agents constitutes violations of the following laws:

- **Advance Fee Fraud** – Section 419, Criminal Code Act.
- **Criminal Breach of Trust** – Section 312, Criminal Code Act.
- **False and Misleading Advertisement** – Section 14, FCCPA 2019.
- **Breach of Contract** – Failure to allocate land and issue agreed documents after full payment.
- **Conspiracy to Defraud** – Section 516, Criminal Code Act.

#### **RELIEFS SOUGHT**

In light of the foregoing, we respectfully request that the relevant authorities:

1. **Launch a formal criminal investigation** into the fraudulent conduct of PWAN HOMES and the individuals responsible for this transaction.
2. **Compel immediate allocation** of the six (6) plots at Ilosiwaju Gardens Estate, along with issuance of all statutory documentation (Contract of Sale, Survey Plan, Deed of Assignment, and Allocation Letter).
3. In the alternative, **order a full refund of ₦5,100,000**, including interest and compensation for breach of trust and economic hardship.
4. **Prosecute all responsible parties** under applicable criminal laws to serve as a deterrent to other real estate scams.
5. **Blacklist PWAN HOMES** and place a regulatory freeze on all further transactions pending the resolution of this and related complaints.

#### **ATTACHED DOCUMENTS (EVIDENCE)**

1. Proof of payment (₦5,100,000) to PWAN HOMES
- 2.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the alleged petitioner*



OFFICE: Km42, Iekki-Epe Expressway Opposite Children's Place Plaza,  
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos  
Tel: +234-8180000652, +234-8180000637  
Email: pwanmaxproperties@gmail.com

## Deed of Assignment

Sold To: [REDACTED]  
07049366428

Date: Mar 05, 2024  
Receipt #: [REDACTED]  
File #: [REDACTED]  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Providus Bank Plc	6	ILOSIWAJU GARDENS	

Description	Line Total	
Being payment for Six(6)plots of Land at ILOSIWAJU GARDENS	N 600,000.00	
Amount in words: Six Hundred Thousand Naira Only.	Subtotal	N 600,000.00
	Tax	N 0.00
	Total	N 600,000.00
Total Amount: N 600,000.00		
Outstanding Balance: N 0.00		
Size per plot: 500Sqm		

FOR PWAN Max Properties and Business Solution  
OYEYEMI QUAMDEEN  
Signature: [REDACTED]



OFFICE: Km42, Iekki-Epe Expressway Opposite Children's Place Plaza,  
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos  
Tel: +234-8180000652, +234-8180000637  
Email: pwanmaxproperties@gmail.com

## Sales Receipt

Sold To: [REDACTED]

Date: Mar 25, 2024  
Receipt #: [REDACTED]  
File #: [REDACTED]  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Providus Bank Plc	6	ILOSIWAJU GARDENS	

Description	Line Total	
Being payment for Six(6)plots of Land at ILOSIWAJU GARDENS	N 3,900,000.00	
Amount in words: Three Million Nine Hundred Thousand Naira and Zero Kobo	Subtotal	N 3,900,000.00
	Tax	N 0.00
	Total	N 3,900,000.00
Additional Information:		
Total Amount: N 3,900,000.00		
Outstanding Balance: N 0.00		
Size per Plot: 500Sqm		

FOR PWAN Max Properties and Business Solution  
OYEYEMI QUAMDEEN  
Signature: [REDACTED]

