



**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@pwanngroup.com](mailto:info@pwanngroup.com), [pwanpronigeria@gmail.com](mailto:pwanpronigeria@gmail.com)

**PETITION AGAINST PWAN HOMES LTD FOR FAILURE TO ALLOCATE LAND AT PEARL CITY ESTATE, ASABA, DELTA STATE – TOTAL AMOUNT ₦1,480,000**

We write to formally petition **PWAN Homes Ltd** for failure to allocate land at **Pearl City Estate, Ibusa, Asaba, Delta State** after full payment was made for both the plot and associated statutory documentation fees.

**FACTS OF THE CASE:**

- On or about [insert exact date/year if known], the petitioner paid the sum of **₦1,200,000 (One Million Two Hundred Thousand Naira)** to **PWAN Homes Ltd** for **one (1) plot of land at Pearl City Estate**, situated at **Ibusa, Delta State**.
- In addition, the petitioner paid another **₦280,000** for associated documentation and estate fees, including:
  - **Deed of Assignment**
  - **Development Levy**
  - **Demarcation Levy**
- Total amount paid = **₦1,480,000 (One Million Four Hundred and Eighty Thousand Naira)**.

- Despite making these payments in full and complying with all requirements, **no physical allocation** has been made to the petitioner to date.
- The petitioner has made multiple visits to PWAN offices and placed several calls to its representatives, yet no resolution has been provided.
- The delay has caused the petitioner undue stress, financial uncertainty, and loss of confidence in the transaction.

## ALLEGED OFFENSES:

The actions of PWAN Homes Ltd constitute:

- **Breach of Contract** – Full consideration was paid without any fulfillment of the land delivery agreement.
- **Fraudulent Misrepresentation** – Land was advertised and sold with the promise of delivery, which has been dishonored.
- **Unjust Enrichment** – The company continues to hold the petitioner's money while providing no value in return.
- **Obtaining Money by False Pretenses** – In violation of **Sections 419 and 323 of the Nigerian Criminal Code**, the funds were obtained without intention to honor the allocation.
- **Violation of Consumer Rights** – As protected under the **Federal Competition and Consumer Protection Act (FCCPA)**, the petitioner's right to fair treatment and value for money was infringed.

## RELIEFS SOUGHT:

We humbly request that your esteemed office:

1. **Investigate the conduct of PWAN Homes Ltd** concerning the marketing and sales at **Pearl City Estate, Asaba**.
2. **Compel immediate allocation** of the land fully paid for or a suitable alternative within the same estate or axis.
3. In the alternative, **order a full refund of ₦1,480,000**, plus accrued interest and damages for the delay, mental distress, and breach of trust.
4. **Impose appropriate regulatory or criminal sanctions** to prevent further fraudulent or negligent practices by PWAN Homes Ltd.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*

 <b>PWAN PRIME</b>	
Contact Address: 23a, Sura Mogaji Street off Coker Road Ilupeju, Lagos. Tel: 0818888692, Whatsapp: 0818888695. Email Address: pwanprime@gmail.com	
<b>OFFICIAL RECEIPT</b>	
Payment Date:	26 April 2022
Client Name:	[REDACTED]
Amount (N):	280,000.00
Balance (N):	-
The sum of:	TWO HUNDRED AND EIGHTY THOUSAND NAIRA ONLY.
Payment Details:	PWAN PRIME STERLING BANK A/C
Cost (N)	Being for: 1. Deed of Assignment 2. Registered Survey Plan 3. Plot Demarcation fee.
100,000.00	Deed of Assignment for One (1) Plot (464Sqm) of undeveloped land located at Pearl City, Estate in Ibusa Asaba, Delta State.
150,000.00	Registered Survey Plan for One (1) Plot (464Sqm) of undeveloped land located at Pearl City, Estate in Ibusa Asaba, Delta State.
30,000.00	Plot Demarcation for One (1) Plot (464Sqm) of undeveloped land located at Pearl City, Estate in Ibusa Asaba, Delta State.
	Development levy (1) Plot of undeveloped land 464sqm, located at Pearl City Estate in Ibusa Asaba, Delta State.
For PWAN PRIME LTD:	ANUNIKE IFEYINWA 

*Thank you for your patronage!*



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

PWAN PRIME INVESTMENTS AND PROPERTIES LTD.

SALES RECEIPT

Sold to: [REDACTED]

Date: April 26, 2022  
Receipt #: [REDACTED]  
File #: [REDACTED]

Payment Method	Reconciling Bank	Estate	Duration		
OUTRIGHT	STERLING BANK	PEARL CITY, ASABA	3 MONTHS		
RESIDENTIAL PLOT					
Qty	Size :	Description	Unit Price	Discount	Line Total
1.00	464SQM	Full Payment for One Plot (464sqm) of land at PEARL CITY, ASABA located at Ibusa, Asaba in Delta State.	1,500,000.00	N300,000.00	1,200,000.00
		Outstanding Balance	Full Amount		
		-	1,500,000.00		
			Sub Payment		
			1,500,000.00		