



07077513836



eluyefachambers@gmail.com

**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 GROUP (ZIONS COURT ESTATE, ODE OMI VILLAGE, IBEJU-LEKKI) FOR FRAUD, NON-ALLOCATION, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦5,700,000**

We are solicitors to the Petitioner, hereinafter referred to as “*our client*,” and on their behalf, we respectfully submit this formal criminal complaint against **PWAN Group**, in connection with its subsidiary responsible for the management and sale of **Zions Court Estate**, Ode Omi Village, Ibeju-Lekki, Lagos State.

## FACTUAL SUMMARY

1. In **2024**, our client purchased **six (6)** residential plots of land at **Zions Court Estate**, Ode Omi Village, Ibeju-Lekki, Lagos State, for a total sum of **₦5,700,000** (Five Million, Seven Hundred Thousand Naira).
2. The total amount covered the cost of land purchase as well as required documentation and related charges.

3. Despite full payment since **2024**, our client has neither received physical allocation of the plots nor any valid land documents confirming the location of the purchased plots.
4. Repeated requests for allocation and several follow-ups have been met with excuses and non-committal responses from PWAN Group representatives. Some staff have gone silent altogether.
5. The company's failure to honour its contractual obligation has caused our client significant financial hardship, emotional distress, and loss of opportunity, despite full compliance with all payment terms.

### CRIMINAL OFFENCES DISCLOSED

The conduct of PWAN Group and its officers discloses multiple breaches of Nigerian criminal and consumer protection laws, including:

- **Advance Fee Fraud and Obtaining by False Pretence** – contrary to Section 1(1)(a) & (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006;
- **Criminal Breach of Trust** – contrary to Section 312 of the Criminal Code Act;
- **Conspiracy to Defraud** – contrary to Section 516 of the Criminal Code Act;
- **Unfair Business Conduct and Misrepresentation** – contrary to Section 14 of the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- **Cheating** – contrary to Section 421 of the Penal Code (where applicable).

### PRAYERS

In light of the above, we respectfully seek the following reliefs:

1. That your office immediately commences a criminal investigation into the conduct of PWAN Group and the responsible officers.
2. That prosecution be initiated against any individuals found culpable of fraud, misrepresentation, and breach of trust.
3. That PWAN Group be compelled to either:
  - Allocate all six (6) residential plots at **Zions Court Estate**, Ode Omi Village, as agreed; **or**
  - Refund the full sum of **₦5,700,000** to our client with applicable interest and appropriate compensation.
4. That the company be ordered to compensate our client for the financial loss, emotional trauma, and hardship suffered due to the prolonged non-allocation.
5. That relevant regulatory and enforcement agencies place strict monitoring on PWAN Group's land transactions and block further sales until all pending obligations are fulfilled.

Our client is prepared to present supporting documentation, including payment receipts, contracts, and any correspondence, to aid in your investigation and enforcement action.

Thank you for your urgent attention to this complaint.

Yours faithfully,

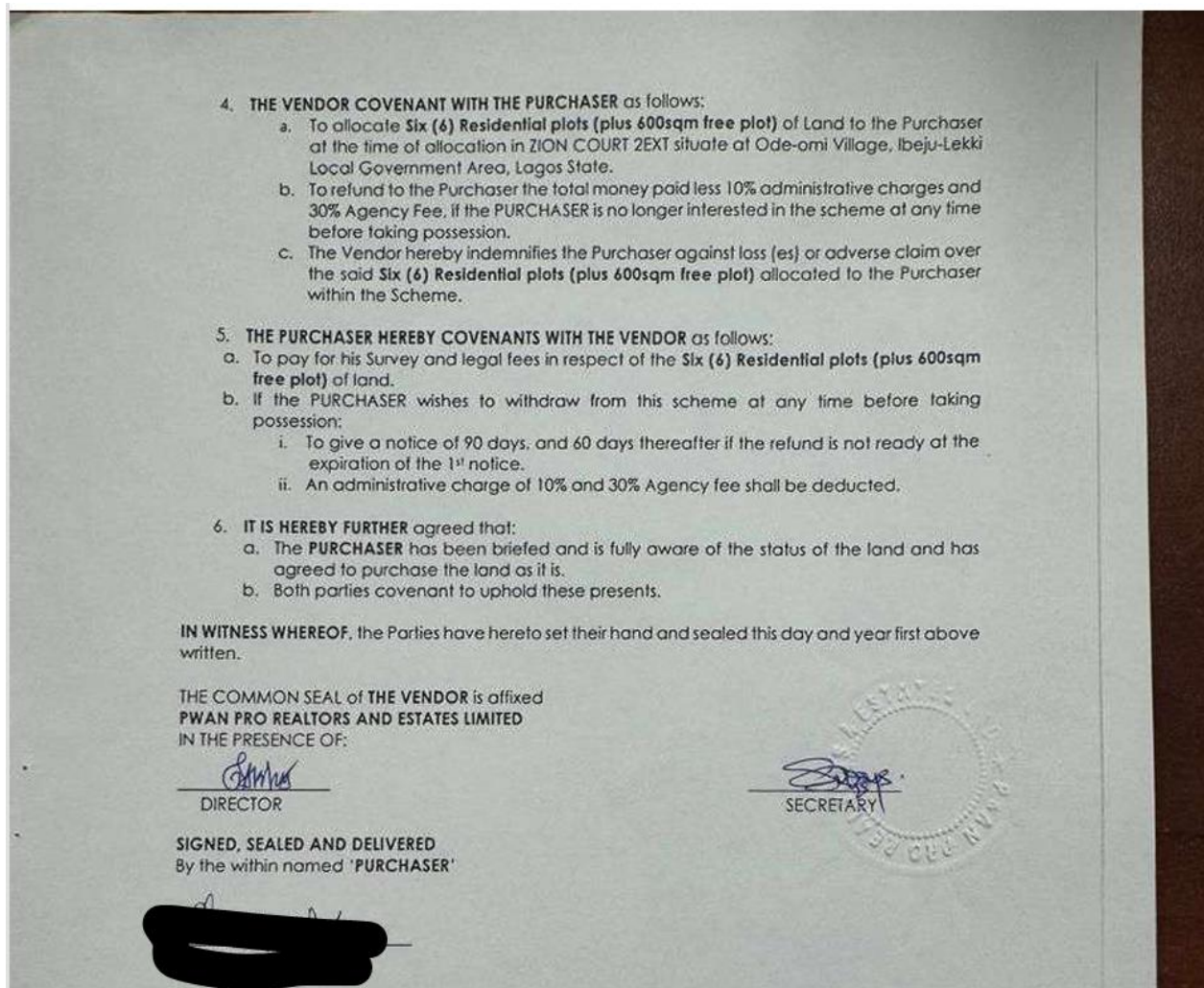


**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the alleged petitioner*



THIS AGREEMENT is made this 13<sup>TH</sup> day of December, 2022

**BETWEEN**

**PWAN PRO REALTORS AND ESTATES** a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its office at CDV Court 1, Olagolo Road, Opposite Catholic Church of Epiphany, Lekki Peninsula Phase 2, Lagos State (hereinafter referred to as **'THE VENDOR'** which expression shall wherever the context so admits include its assigns, legal representatives and successors-in-title) of the one part.

**AND**

[REDACTED] Hereinafter referred to as **'THE PURCHASER'** of the other part. (context so admits include her heirs, assigns and legal representatives) of the other part.

**WHEREAS:**

1. The Vendor is a real estate Marketing and Investment Company engaged in the acquisition of tracts of land and development of estates which is laid out into schemes and gated estates and are thereafter allocated to Subscribers to the Schemes.
2. The Vendor has acquired a vast tract of land measuring in **600 square meters per plot** situate and described as ZION COURT 2EXT.
3. The Vendor with intent to achieve its object of development of Schemes has procured ZION COURT 2EXT hereinafter referred as 'the Scheme', whereby interested person (s) or organization subscribes to the Scheme by way of monthly, quarterly contribution or outright payment towards ownership of plot(s) of land within the Scheme.

**IT IS HEREBY AGREED** that the Purchaser has fully subscribed to **Six (6) Residential plots (plus 600sqm free plot)** of land (measuring **600 square meters** per plot) and the Vendor shall allocate same within the Scheme to the Purchaser under the following terms and conditions:

- a) The Purchaser has paid the purchase sum of **N5,700,000.00 (Five Million Seven Hundred Thousand Naira)** for the full subscription of the said **Six (6) Residential plots (plus 600sqm free plot)** of land at ZION COURT 2EXT, the receipt of which the Vendor hereby acknowledges.
- b) The Purchaser shall bear the cost of the preparation of a Survey Plan in his name which shall be **CHUGBO EMEKA HENRY**.
- c) The Purchaser shall contribute his proportionate share/cost of infrastructure and



# CONTRACT OF SALE

BETWEEN

**PWAN PRO REALTORS AND ESTATES LIMITED**  
(THE VENDOR)

AND

[REDACTED]

IN RESPECT OF SIX (6) RESIDENTIAL PLOTS (PLUS 600SQM FREE PLOT) OF  
LAND AT ZION COURT 2 EXTENTION SITUATE AT ODE-OMI VILLAGE,  
IBEJU-LEKKI LOCAL GOVERNMENT AREA, LAGOS STATE.

PREPARED BY:

EMMANUEL NDUBISI, ESQ.  
C/O THE LAW FIRM OF OLUKAYODE A. AKOMOLAFE  
2, OLUFUNMILOLA OKIKIOLU STREET,  
OFF TOYIN STREET,  
IKEJA,  
LAGOS.





CDV Court 1, Opposite Catholic Church of the Epiphany,  
Ologolo Road, Lekki Peninsula Phase 2, Lekki Lagos.

08181888837

31ST OCTOBER, 2024.

Dear Valued Client,

### **PHYSICAL ALLOCATION NOTIFICATION**

You are hereby notified of your allocation as follows:

Estate Name: ZION COURT 2EXT, ODE-OMI

Type of Plot: RESIDENTIAL

No of Plots: SIX (6) PLUS 600SQM FREE PLOT

Plot Details: BLOCK L1 PLOT 3,5,7,9,11,13,15

Date of Allocation: OCTOBER 31ST, 2024.

**NB:** This letter is temporary pending the receipt of your survey plan.

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

Thanking you for choosing **PWAN PRO REALTORS AND ESTATES LTD.**



Contact Address: Gdv Court 1, Opposite Catholic Church Of The Epiphany, Ologolo Road, Lekki Lagos.  
08181888837, Whatsapp: 08181888835.  
Email Address: pwanpronigeria@gmail.com  
Phone:

### Sales Receipt

Sold to

Date:

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location		Duration
OUTRIGHT		ZENITH BANK	ZION COURT 2 EXT		6 MONTHS
Qty	Size #	Description	Amount	Discount	Line Total
6.00	600Sqm	Outright Payment for Survey Of Six (6) Residential Plots with One (1) Free Plot Of Land @ ZION COURT 2 EXTENSION	700,000.00		700,000.00
6.00	600Sqm	Outright Payment for Deed Of Assignment Of Six (6) Residential Plots with One (1) Free Plot Of Land @ ZION COURT 2 EXTENSION	700,000.00		700,000.00
6.00	600Sqm	Outright Payment for Demarcation Of Six (6) Residential Plots with One (1) Free Plot Of Land @ ZION COURT 2 EXTENSION	210,000.00		210,000.00
Amount in words: One Million Six Hundred and Ten Thousand Naira Only.			Total Discount	Subtotal Sales Tax	1,610,000.00





Contact Address: Cdv Court 1, Opposite Catholic Church Of The  
Epiphany, Ologolo Road, Lekki Lagos.  
08181888837, Whatsapp: 08181888835.  
Email Address: pwanpronigeria@gmail.com

Sales Receipt

Sold to

Date:

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location	Duration	
FURTHER		ZENITH BANK	ZION COURT 2 EXT	6 MONTHS	
Qty	Size #	Description	Amount	Discount	Line Total
Further Payment for Six (6) Residential					
6.00	600sqm	Plots with One (1) Free Plot Of Land @	1,000,000.00		1,000,000.00
		ZION COURT 2 EXTENSION			

Amount in words: One Million Naira Only.

Total Discount

Subtotal 1,000,000.00  
Sales Tax  
Total 1,000,000.00

Total Amount ₦ 5,700,000.00  
Outstanding Bal 3,700,000.00

FOR PWAN Pro Realtors and Estate Ltd:

DR. MICHAEL







Contact Address: Cdv Court 1, Opposite Catholic Church Of The  
Epiphany, Ologolo Road, Lekki Lagos.  
08181888837, Whatsapp: 08181888835.  
Email Address: pwanpronigeria@gmail.com

Phone:

### Sales Receipt

Sold

Date:

Receipt #:

File #:

Payment Method		Resolving Bank	Land Location		Duration
FURTHER		ZENITH BANK	ZION COURT 2 EXT		6 MONTHS
Qty	Size #	Description	Amount	Discount	Line Total
6.00	400Sqm	Further Payment for Six (6) Residential Plots with One (1) Free Plot Of Land @ ZION COURT 2 EXTENSION	2,000,000.00		2,000,000.00

Amount in words: Two Million Naira Only.

Total Discount

Subtotal 2,000,000.00  
Sales Tax  
Total 2,000,000.00

Total Amount ₦ 5,700,000.00  
Outstanding Bal: 1,700,000.00

FOR PWAN Pro Realtors and Estate Ltd:

DR. MICHAEL ANHILITE

Signature





Contact Address: Cdv Court 1, Opposite Catholic Church Of The  
Epiphany, Ologolo Road , Lekki Lagos.  
08181888837, Whatsapp: 08181888835.  
Email Address: pwanpronigeria@gmail.com  
Phone:

**Sales Receipt**

Sold to

Date:

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location		Duration	
FINAL		ZENITH BANK	ZION COURT 2 EXT		6 MONTHS	
Qty	Size #	Description	Amount	1	Discount	Line Total
6.00	600Sqm	Final Payment for Six (6) Residential Plots with One (1) Free Plot Of Land @ ZION COURT 2 EXTENSION	1,700,000.00			1,700,000.00

Amount in words: One Million Seven Hundred Thousand Naira Only.

Total Discount

Subtotal 1,700,000.00  
Sales Tax  
Total 1,700,000.00

Total Amount ₦ 5,700,000.00  
Outstanding Bal: -

FOR PWAN Pro Realtors and Estate Ltd:



CDV Court 1, Opposite Catholic Church of the Epiphany,  
Ologolo Road, Lekki Peninsula Phase 2, Lekki Lagos.  
08181888837

13TH DECEMBER, 2022

[REDACTED]  
Dear Sir,

**PAYMENT NOTIFICATION LETTER**

Sequel to your final payment of **₦1,700,000.00 (One Million Seven Hundred Thousand Naira)** which makes it a total of **₦5,700,000.00 (Five Million Seven Hundred Thousand Naira)** for **Six (6) Residential plots plus 600SQM free of Land at ZION COURT 2EXT, situate at Ode-omi Village, Ibeju-Lekki Local Government Area, Lagos State.**

Please find below the description of the Land you purchased:

**LOCATION:** Ode-omi Village, Owode Ise, Ibeju-Lekki Local Government Area, Lagos State.

**TYPE/SIZE:** Six (6) Residential plots plus 600SQM free of undeveloped parcel of land measuring 600sqm per plot.

**TITLE:** Deed of Assignment and Survey.

You are required to make the following payments:

1. **Provisional Survey Plan Fee:** To pay the sum of **₦100,000** per plot, being the cost for your Provisional Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of **₦30,000** per plot for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of **₦100,000** per plot being the payment for your Deed of Assignment.
4. **Development Fee:** We would kindly advice you on the cost for the development levy at a later date.