



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

PETITION AGAINST PWAN FOR SALE OF PROPERTY BUILT ON GOVERNMENT RIGHT-OF-WAY – TOTAL AMOUNT ₦38,500,000

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally petition **PWAN** in respect of a **fraudulent real estate transaction, misrepresentation, and gross negligence** that led to the loss of a fully paid residential property at Zion Residence, Lekki.

FACTS OF THE CASE:

- The petitioner purchased a **three-bedroom apartment** at **Zion Residence, Orchid Road, Lekki Phase 2**, for the total sum of **₦38,500,000 (Thirty-Eight Million, Five Hundred Thousand Naira)**.
 - A letter was issued to the petitioner from the **Ministry of Physical Planning and Urban Development** affirming the transaction.
 - However, the property was subsequently **demolished by government authorities**, who declared that the building had been constructed on the **right-of-way of a canal**, rendering the property **illegally sited and unsafe**.
 - This action resulted in the **complete loss of the petitioner’s investment**, despite due diligence and full compliance with payment terms.
-

APPLICABLE LEGAL BREACHES:

The actions of PWAN potentially violate:

- **Section 419 of the Criminal Code Act** – Obtaining money by false pretence
 - **Section 323 of the Criminal Code Act** – Negligent conduct causing loss
 - **Lagos State Urban and Regional Planning Law** – Illegal construction on designated public land
 - **Contract law** – Breach of implied warranty of fitness and lawful title
 - **Consumer Protection Council Act** – Misrepresentation and failure to ensure safety of investment
-

RELIEFS SOUGHT:

We respectfully request that your office:

1. **Investigate PWAN and its agents** for selling government-encroaching property.
 2. **Identify and hold liable** all individuals and entities responsible for this gross negligence and financial loss.
 3. **Order full restitution/refund** of **₦38,500,000** with accrued interest.
 4. **Initiate prosecution** where criminal breach of trust or misrepresentation is confirmed.
 5. **Prevent PWAN** from further engaging in property sales until regulatory compliance and customer restitution is assured.
-

ATTACHED DOCUMENTS:

- Sales agreement and receipts
- Letter from the Ministry of Physical Planning and Urban Development
- Demolition photographs or notices

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ
Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

PWAN PRO

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

Sold to: [REDACTED]

Sales Receipt
Date: 21/8/2020
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	Duration
INITIAL	ZENITH BANK	ZION RESIDENCE	24MONTHS
Qty	Description	Amount	Discount
1.00	3 BEDROOM Initial Payment for One(1) 3 bed room terrace In ZION Residence Estate, Orchid Road Lekki Phase 2.	5,000,000.00	
			5,000,000.00

Amount in words: Five Million naira Only

Total Discount

Subtotal 5,000,000.00
Sales Tax
Total 5,000,000.00

Total Amount N 35,000,000.00
Outstanding Bal: 30,000,000.00

FOR PWAN Pro Realtors and Estate Ltd:
MICHEAL AKHUTIS
Signature: [Signature]
Date: 21/8/2020
ESTATE LIMITED

PWAN PRO

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

Sold to: [REDACTED]

Sales Receipt
Date: 22/8/2020
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	Duration
FURTHER	ZENITH BANK	ZION RESIDENCE	24MONTHS
Qty	Description	Amount	Discount
1.00	3 BEDROOM Initial Payment for One(1) 3 bed room terrace In ZION Residence Estate, Orchid Road Lekki Phase 2.	5,000,000.00	
			5,000,000.00

Amount in words: Five Million naira Only

Total Discount

Subtotal 5,000,000.00
Sales Tax
Total 5,000,000.00

Total Amount N 35,000,000.00
Outstanding Bal: 25,000,000.00

FOR PWAN Pro Realtors and Estate Ltd:
MICHEAL AKHUTIS
Signature: [Signature]
Date: 22/8/2020
ESTATE LIMITED

PWAN PRO REALTORS AND ESTATES LTD.



CDV Court 1 Ologolo Road Opp. Catholic Church of Epiphany,
Lekki Phase 2, Ajah, Lagos State.
08181888837

Dear [REDACTED]

REQUEST APPROVAL LETTER

Sequel to your request for an upgrade to a corner-piece 3 Bedroom Terrace at Zion Residence Estate, dated 8th September, 2020 via our email address, we wish to inform you that your request has been approved.

PURCHASER'S REQUEST:

- To upgrade from 3 Bedroom Terrace to a corner-piece 3 Bedroom Terrace at Zion Residence Estate
- Request for cost implications, procedures and payment modalities attached to an upgrade to a corner-piece 3 Bedroom Terrace.

Your requests are well outlined and approved, you can be best assured that it has been considered under the following agreement and terms:

- That you requested for a corner-piece 3 Bedroom Terrace in Zion Residence Estates located at Orchid Road, Lekki Phase 2, Eti-Osa Local Government Area, Lagos State.
- That the outright sale of this Terrace as of the time of this agreement is **N35, 000,000.00 (Thirty Five Million Naira)** only.
- That a corner-piece will attract extra 10% of the total cost of the Terrace.
- That the total cost of the Terrace plus the extra 10% charge for the corner-piece is **N38, 500,000.00 (Thirty Eight Million Five Hundred Thousand Naira)** only

Payments shall be made into any Zenith Bank branch. Account Name: **Pwan Pro Realtors and Estates Limited**. Account Number: **1016082251** OR any Fidelity bank branch. Account Name: **Pwan Pro Realtors and Estates Limited**. Account Number: **5600509617**

Thank you very much for subscribing to **ZION RESIDENCE** through **PWAN PRO REALTORS AND ESTATE LTD.**

		Contact Address: Cdv Court 1, Oppsite Catholic Church Of The Epiphany, Ologolo Road, Lekki Lagos. Phone: 08181888837, Whatsapp: 08181888835 Email Address: pwanpronigeria@gmail.com	
Sold: [REDACTED]		Sales Receipt	
Date: 28/11/2020		Receipt #: [REDACTED]	
File #: [REDACTED]			
Payment Method	Reconciling Bank	Land Location	Duration
FURTHER	ZENITH BANK	ZION RESIDENCE	24MONTHS
Qty	Description	Amount	Discount
1.00	3 BEDROOM Further Payment for One(1) 3 bed room terrace in ZION Residence Estate, Orchid Road Lekki Phase 2.	5,000,000.00	
Amount in words: Five Million naira Only		Total Discount	Subtotal 9,000,000.00
			Sales Tax
			Total 5,000,000.00
Total Amount N 35,000,000.00			
Outstanding Bal: 15,000,000.00			
FOR PWAN Pro Realtors and Estate Ltd:			
EGUNLUS ADEWALE			
Signature			

PWAN PRO

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

Sales Receipt

Sold to: [REDACTED]

Date: 27/11/2020
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	Duration		
FURTHER	ZENITH BANK	ZION RESIDENCE	24MONTHS		
Qty	Size #	Description	Amount	Discount	Life Total
1.00	3 BEDROOM	Further Payment for One(1) 3 bed room terrace in ZION Residence Estate, Orchid Road Lekki Phase 2.	5,000,000.00		5,000,000.00

Amount in words: Five Million naira Only

Total Amount: N 35,000,000.00
Outstanding Bal: 20,000,000.00

FOR PWAN Pro Realtors and Estate Ltd:

EGUNLUSI ADEWALE REALTORS

Signature: [REDACTED]

Date: 27/11/2020

STATE LIMITED

Total Discount

Subtotal: 5,000,000.00
Sales Tax
Total: 5,000,000.00

PWAN PRO

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

Sales Receipt

Sold to: [REDACTED]

Date: 21/8/2020
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	Duration		
INITIAL	ZENITH BANK	ZION RESIDENCE	24MONTHS		
Qty	Size #	Description	Amount	Discount	Life Total
1.00	3 BEDROOM	Initial Payment for One(1) 3 bed room terrace on cornerplot in ZION Residence Estate, Orchid Road Lekki Phase 2.	5,000,000.00		5,000,000.00

Amount in words: Five Million naira Only

Total Amount: N 38,500,000.00
Outstanding Bal: 33,500,000.00

FOR PWAN Pro Realtors and Estate Ltd:

EGUNLUSI ADEWALE REALTORS

Signature: [REDACTED]

Date: 21/8/2020

STATE LIMITED

Total Discount

Subtotal: 5,000,000.00
Sales Tax
Total: 5,000,000.00

1 of 4

Contact Address: COV COURT 1, Opposite COUNTRY CLUB, Ologolo Road, Lekki Lagos.
Phone: 0818188837
Whatsapp: 0818188835
Email Address: pwanpronige.ia@gmail.com

Sales Receipt

Sold to: [REDACTED] Date: 22/8/2020
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	Duration
FURTHER	ZENITH BANK	ZION RESIDENCE	24MONTHS

Qty	Size #	Description	Amount	Discount	Line Total
1.00	3 BEDROOM	Initial Payment for One(1) 3 bed room terrace on cornerplot in ZION Residence Estate, Orchid Road Lekki Phase 2.	5,000,000.00		5,000,000.00

Amount in words: Five Million naira Only

Total Discount: [REDACTED] Subtotal: 5,000,000.00
Sales Tax: [REDACTED] Total: 5,000,000.00

Total Amount: ₦ 38,500,000.00
Outstanding Bal: 28,500,000.00

FOR PWAN Pro Realtors and Estate Ltd:

EGUNLUSI ADDRESS: [REDACTED]

Signature: [REDACTED] Date: 22/8/2020

Signature: [REDACTED] Date: [REDACTED]

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PAYMENT INSTALLMENT...



Debit [REDACTED] Notification Service (GeNS)

We wish to inform you that a Debit transaction occurred on your account with us.

The details of this transaction are shown below:

Transaction Notification

Account Number : *****9077
Transaction Location : E- CHANNELS
Description : NIBSS Instant Payment Outward
Amount : NGN 5,000,000.00
Value Date : 10-Dec-2021
Remarks : 000013211210120416000478666298 REF421487107005000000002112101204 TO PWAN- REALTORS AND ESTATES LTD /53.75/REF.REF.421487107005000000000211210 fro
Time of Transaction : 12:04
Document Number : 0

The privacy and security of your Bank Account details is important to us. If you would prefer that we do not display account balance in every transaction alert sent to you via email please dial *737*51*1#.

Thank you for choosing Guaranty Trust Bank Limited

Get up to ₦5million within 2 minutes. Pay back at 1.33% monthly. No collateral. No hidden charges.



GeNS@gtbank.com

To You

11:32



11-
Dec-
2021

Dr [REDACTED]

Guaranty Trust Bank eElectronic Notification Service (GeNS)

We wish to inform you that a Debit transaction occurred on your account with us.

The details of this transaction are shown below:

Transaction Notification

Account Number : *****9077
Transaction Location : E- CHANNELS
Description : NIBSS Instant Payment Outward
Amount : NGN 5,000,000.00
Value Date : 11-Dec-2021
Remarks : 00001321121123232000480672363 REF42148710700500000000211211233 TO PWAN-PRO REALTORS AND ESTATES LTD /S3.75/REF/REF-421487107005000000002112111ng
Time of Transaction : 12:33
Document Number : 0

The balances on this account as at 12:33 are as follows:

Current Balance : NGN [REDACTED]
Available Balance : NGN [REDACTED]

The privacy and security of your Bank Account details is important to us. If you would prefer that we do not display your account balance in every transaction alert sent to you via email please dial *737*51*12.

Thank you for choosing Guaranty Trust Bank Limited

PWAN PRO

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

Sales Receipt

Sold to: [REDACTED] Date: 11/12/2021
Receipt #: [REDACTED]
File #: [REDACTED]

+353876344936, +447426904562

Payment Method	Reconciling Bank	Land Location	Duration		
FURTHER	ZENITH BANK	ZION RESIDENCE	24MONTHS		
Qty	Size #	Description	Amount	Discount	Line Total
1.00	3 BEDROOM	Further Payment for One(1) 3 bed room terrace on cornerplot in ZION Residence Estate, Orchid Road Lekki Phase 2.	5,000,000.00		5,000,000.00

Amount in words: Five Million naira Only

Total Discount

Subtotal 5,000,000.00
Sales Tax
Total 5,000,000.00

Total Amount N 38,500,000.00
Outstanding Bal: 8,500,000.00

FOR PWAN Pro Realtors and Estate Ltd:

DR MICHAEL AKHURU

Signature

PWAN PRO REALTORS & ESTATE LIMITED
Date: 11-12-2021

PWAN PRO

Contact Address: Cdv Court 1, Oppsite Catholic Church Of The Epiphany, Ologolo Road, Lekki Lagos.
Phone: 0818188837,
Whatsapp: 0818188835
Email Address: pwanpronigeria@gmail.com

Sales Receipt

Sold to: [REDACTED] Date: 10/12/2021
Receipt #: [REDACTED]
File #: [REDACTED]

Paym Int	Further	Bank	Land Location	Duration
QTY	Size #	Description	Amount	Discount
1.00	3 BEDROOM	Further Payment for One(1) 3 bed room terrace on cornerplot in ZION Residence Estate, Orchid Road Lekki Phase 2.	5,000,000.00	5,000,000.00

Amount in words: Five Million naira Only

Total Discount: [REDACTED] Subtotal: 5,000,000.00
Sales Tax: [REDACTED] Total: 5,000,000.00

Total Amount: ₦ 38,500,000.00
Outstanding Bal: 13,500,000.00

FOR PWAN Pro Realtors and Estate Ltd.
DR MICHAEL AKUOFE
Signature: [REDACTED]
Date: 12/12/2021
ESTATE LIMITED

Customer Service Representative . PWAN PRO REALTORS AND ESTATES LTD .



CDV Court 1 Ologolo Road Opp. Catholic Church of Epiphany,
Lekki Phase 2, Ajah, Lagos State.
0818188837

Dear M [REDACTED]

REQUEST APPROVAL LETTER

Sequel to your request for an upgrade to a corner-piece 3 Bedroom Terrace at Zion Residence Estate, dated 8th September, 2020 via our email address, we wish to inform you that your request has been approved.

PURCHASER'S REQUEST:

- To upgrade from 3 Bedroom Terrace to a corner-piece 3 Bedroom Terrace at Zion Residence Estate
- Request for cost implications, procedures and payment modalities attached to an upgrade to a corner-piece 3 Bedroom Terrace.

Your requests are well outlined and approved, you can be best assured that it has been considered under the following agreement and terms:

- That you requested for a corner-piece 3 Bedroom Terrace in Zion Residence Estates located at Orchid Road, Lekki Phase 2, Eti-Osa Local Government Area, Lagos State.
- That the outright sale of this Terrace as of the time of this agreement is **N35, 000,000.00 (Thirty Five Million Naira)** only.
- That a corner-piece will attract extra 10% of the total cost of the Terrace.
- That the total cost of the Terrace plus the extra 10% charge for the corner-piece is **N38, 500,000.00 (Thirty Eight Million Five Hundred Thousand Naira)** only

Payments shall be made into any Zenith Bank branch. Account Name: **Pwan Pro Realtors and Estates Limited**. Account Number: **1016082251** OR any Fidelity bank branch. Account Name: **Pwan Pro Realtors and Estates Limited**. Account Number: **5600509617**

Thank you very much for subscribing to **ZION RESIDENCE** through **PWAN PRO REALTORS AND ESTATE LTD.**

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4 Messages

UPDATE ON ZION RESIDE...



Dear M [REDACTED]

The Management of PWAN PRO REALTORS AND ESTATES LIMITED will like to thank you for subscribing to our ZION RESIDENCE SMART BUILDING ESTATE situated at Orchid Road Lekki Peninsula Phase 2 Lagos. Be rest assured that you are guaranteed of your good investment as you made the right decision.

Please we will like to bring to your notice the current development in our ZION RESIDENCE SMART BUILDING ESTATE.

The building structures have been completed and we are in the final stage of completing both the Internal and External Finishing, however Lagos State Government advised that we complete our documentation process before going back to site.

The building structures have been completed and we are in the final stage of completing both the Internal and External Finishing, however Lagos State Government advised that we complete our documentation process before going back to site.

We therefore appeal that you bear with us while we round up this process with the Lagos State Government.

Hopefully, the site should resume work in full force by next week.

We are also proposing our Home Allotment in six weeks' time from site resumption.

Thank you

Signed;

15th of July 2022.


15th July 2022.

Dear Sir,

STATUS REPORT ON YOUR INVESTMENT SITUATE AT THE ZION RESIDENCE LEKKI.

The Management of PWAN PRO Realtors and Estates Limited uses this medium to appreciate you for subscribing to our Zion Residence Smart Building Estate. We guarantee you of getting the best in this Estate which off course we will not settle for less in our service delivery to our esteemed customer like you.

We kindly appeal for more patient to enable us conclude on the required approval process from the Lagos State Government, it is not in our business character to cause such delays as it is due to Government policies which is required for us to abide to as a reputable company.

The approval status is in progressive stage and hopefully it will be concluded soon for us to go back to site. However, been law abiding citizens, we will not want to by-pass any stage in the approval process but we assure you that we will get all license needed from the Lagos state Government and move back to the site.

In the interim, we crave your indulgence to continue to exercise more patience and be rest assured that your investment is secured with us and construction will commence immediately the necessary licenses and permits are secured.

Thank you for believing in us at PWAN PRO and for investing with us.

Yours faithfully,


DR MICHAEL AKHUIETIE



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

DATE: 5th April, 2023.



Dear Esteemed Client,

STATUS REPORT ON YOUR INVESTMENT SITUATE AT ZION RESIDENCE LEKKI.

In respect of our **ZION RESIDENCE** which you are our Esteemed Subscriber, we wish to inform you that we are still processing all the necessary Clearance with the appropriate Authorities.

We have accelerated and will continue to undertake all the necessary steps and efforts to obtain the Approval and Clearance from the designated Authorities. We honestly promise to rectify and deliver in no distant future.

We sincerely apologize for the inconveniences, and we appreciate your golden patience, we plead that you bear with us temporarily, and wish to reiterate that your satisfaction remains our utmost priority.

Thanks for your understanding and patronage.

Yours sincerely,

DR MICHAEL AKHUETIE.
MANAGING DIRECTOR.



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

5TH FEBRUARY, 2024.

FROM:
DR. MICHAEL AKHUETIE.
MANAGING DIRECTOR.

Dear Esteemed Client,

ZION RESIDENCE

We write to express our sincerest gratitude for your patience in respect to our Zion Residence in which you are a valued Investor.

On the pending issue of securing the Drainage Clearance from the Ministry of Environment and Water Resources, Office of Drainage Services and Water Resources Lagos State, we wish to inform you that we are in constant communication and also met recently with the Permanent Secretary and he advised that we exercise a little bit of patience as the matter will be resolved in no distance future.

We further wish to inform you that our Estate (Zion Residence) was not Marked, therefore it is safe and not by any means affected by the ongoing Ikota River alignment exercise within the environs.

Be rest assured that your investment is safe with us and the value has increased rapidly to the current market value, we further assure that we are dedicated to exploit all necessary measures required of us to move back to site as soon as possible.

Once again, with deep appreciation, thank you for your patience.

Yours Sincerely,


DR MICHAEL AKHUETIE



LAGOS STATE GOVERNMENT

MPP&UD/DM/24/427/7

15th August, 2024

PWAN PRO Realtors &
Investment Limited (Zion Residences),
? Michael Akhuetie, CDV Court 1,
Opp. Catholic Church of the Epiphany,
Ologolo, Lekki Peninsula 2,
Lagos State.

**RE: APPLICATION FOR RIGHT OF WAY CLEARANCE FOR. PWAN PRO
REALTORS AND INVESTMENT LIMITED (ZION RESIDENCES)**

I am to refer to your application on the above subject with respect to
your property at Ajigbada/Akanbi Awe Village, Okun Ajah, Eti-Osa
Local Government Area, Lagos State.

2. I am also to inform you that after charting the Survey Plan submitted
with Plan Number AAB/3649/003A/2022/LA, and Coordinates
563207.500mE/710928.967mN, signed by Adeniyi A.B. and dated
19th October, 2022, it revealed that the subject site is free from
Coastal Road Right of Way Alignment as at 15th August, 2024.
3. Thank you.

15/08/24

Somolu, O. (Fnitp)
HOD (Development Matters Dept.)
For: Permanent Secretary (OPP)



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

2ND SEPTEMBER, 2024.

FROM:
DR. MICHAEL AKHUETIE
MD PWAN PRO.

Dear Sir,

ZION RESIDENCE

The above subject matter refers:

Sequel to our letter dated the 30th day of July 2024, in respect of your investment at our **ZION RESIDENCE**, we wish to inform you that we received a letter from the Lagos State **MINISTRY OF PHYSICAL PLANNING AND URBAN DEVELOPMENT** stating categorically that our property is free from **Coastal Road Right of Way Alignment**.


The above stated implies that our property does not obstruct or interfere with any Lagos State project whatsoever, and the said letter will fast track the issuance of the Drainage Clearance from the Lagos State Ministry of Environment and Water Resources.

Please find attached the aforementioned letter from the Ministry of Physical Planning and Urban Development.

Once again, we appreciate your patience and we promise to deliver your investment in no distant future.

Thank you very much.

Please accept our warm professional regards.


DR. MICHAEL AKHUETIE.
MANAGING DIRECTOR.