



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 GROUP FOR FRAUDULENT MISREPRESENTATION AND INCOMPLETE LAND ALLOCATION AFTER PAYMENT FOR 13 PLOTS ACROSS LAGOS, ANAMBRA, AND IMO STATES

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, specifically its subsidiary **PWAN HOMES**, for failure to fulfil contractual obligations and complete documentation for the purchase of thirteen (13) plots of land made between **2019 and January 2020**.

FACTS OF THE CASE:

1. Between **2019 and January 2020**, the alleged petitioner made full payments for a total of **13 plots** of land spread across **three estates** owned by PWAN HOMES located in **Lagos, Anambra, and Imo States**.
2. Despite completing full payment, the alleged petitioner suffered years of **non-allocation, unanswered complaints, and emotional trauma** before partial intervention by the **Federal Criminal Investigation Department (FCID), Abuja Headquarters**, compelled PWAN HOMES to allocate some of the land a few months ago.

3. However, the allocations provided were **not in the locations originally paid for**, and in some cases, **no allocation letters or survey documents** have been issued—especially for the plots located in **Anambra and Imo States**.
4. As it stands, only the Lagos property has proper documentation. The rest remain undocumented, raising legitimate concerns about the **authenticity, legality, and future ownership security** of those properties.
5. The situation demonstrates a pattern of **fraudulent misrepresentation, breach of contract**, and potential intention to deprive the petitioner of lawful property rights under the guise of real estate investment.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN HOMES and its representatives potentially violates the following laws of the Federal Republic of Nigeria:

1. **Section 312** of the *Criminal Code Act*, Cap C38, LFN 2004 – *Criminal breach of trust*
2. **Section 419** of the *Criminal Code Act* – *Obtaining property under false pretences*
3. **Consumer Protection Framework** – Violation of fair treatment, contractual transparency, and protection of buyers

RELIEFS SOUGHT:

Given the long-standing delay, documented inconsistencies, and psychological toll inflicted upon the alleged petitioner, we respectfully request that your office:

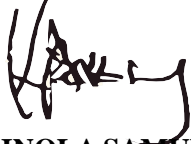
1. **Investigate PWAN HOMES and PWAN Group** for repeated violations of contractual obligations and potential fraudulent land transactions.
2. **Compel PWAN HOMES to immediately provide valid documentation** for all 13 plots of land, including but not limited to:
 - Survey plans
 - Allocation letters
 - Deeds of Assignment
3. Where relocation or reallocation has occurred, ensure that it was done **with consent**, and compel the company to **revert or compensate accordingly** if not.
4. **Take enforcement action** to prevent other innocent investors from falling victim to the same systemic manipulation, and prosecute all responsible officers if necessary.

ATTACHED DOCUMENTS:

- Contracts of Sale
- Payment Receipts

We trust this petition will be given the urgency it deserves in the interest of justice and public protection.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner


ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

Payment Method	Reconciling Bank	Estate	Duration
Outright	058152052 - Guaranty Trust Bank Plc	Tehilla Gardens Phase 2 Owerri	

Description	Line Total
Being full payment for 3.00 Plot(s) of [TGE 2-OW] Land at Tehilla Gardens Phase 2 Owerri	₦ 4,860,000.00
Amount in words: Four Million, Eight Hundred Sixty Thousand Naira and Zero Kobo Only	
	Subtotal ₦ 4,860,000.00
	Tax ₦ 0.00
	Total ₦ 4,860,000.00

Additional Information



HEAD OFFICE: Floor 1 to 5 PURI Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Oko Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Abuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To: Mr. [REDACTED]

Date: Jan 08, 2020
Receipt #: [REDACTED]
File #: [REDACTED]
Comment:



HEAD OFFICE Floor 1 to 5 FURI Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE 16A Sule Abuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr

Date:

Nov 15, 2019

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Installment	011152303 - First Bank of Nigeria Plc	Immaculate Gardens, Amansea, Awka	3Mths

Description	Line Total	
Being initial payment for 3.00 Plot(s) of [IGAA] Land at Immaculate Gardens, Amansea Awka	₦ 5,300,000.00	
Amount in words: Five Million, Three Hundred Thousand Naira and Zero Kobo Only	Subtotal	₦ 5,300,000.00
	Tax	₦ 0.00
	Total	₦ 5,300,000.00
Additional Information		
Total Amount: ₦ 6,750,000.00		



HEAD OFFICE Floor 1 to 5 FURI Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE 16A Sule Abuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To: Mr

Date:

Nov 05, 2019

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Installment	011152303 - First Bank of Nigeria Plc	Immaculate Gardens, Amansea, Awka	3Mths

Description	Line Total	
Being final payment for 1.00 Plot(s) of [IGAA] Land at Immaculate Gardens, Amansea Awka	₦ 850,000.00	
Amount in words: Eight Hundred Fifty Thousand Naira and Zero Kobo Only	Subtotal	₦ 850,000.00
	Tax	₦ 0.00
	Total	₦ 850,000.00
Additional Information		
Total Amount: ₦ 2,500,000.00		



HEAD OFFICE: Floor 1 to 5 Pwani Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanihomes.com

Sales Receipt

Sold To:

Mr

Date:

Dec 14, 2019

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Outright	058152052 - Guaranty Trust Bank Plc	Safari Park Estate Phase 2	

Description	Line Total	
Being full payment for 5.00 Plot(s) of [SPE 2] Safari Parks Estate Phase 2	N 3,000,000.00	
Being full payment for 1.00 Plot(s) of [SPE 2] Safari Parks Estate Phase 2 FREE PROMO PLOT		
Amount in words: Three Million Naira and Zero Kobo Only	Subtotal	N 3,000,000.00
	Tax	N 0.00
	Total	N 3,000,000.00
Additional Information		



HEAD OFFICE: Floor 1 to 5 Pwani Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanihomes.com

Sales Receipt

Sold To:

Mr

Date:

Nov 17, 2019

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Outright	011152303 - First Bank of Nigeria Plc	Immaculate Gardens, Amansea, Awka	

Description	Line Total	
Being full payment for 3.00 Unit(s) of [DOA] Deed of Assignment	N 300,000.00	
Being full payment for 3.00 Unit(s) of [SV] Survey	N 510,000.00	
Being full payment for 3.00 Unit(s) of [PD] Plot Demarcation	N 150,000.00	
Amount in words: Nine Hundred Sixty Thousand Naira and Zero Kobo Only	Subtotal	N 960,000.00
	Tax	N 0.00