ELUYEFA CHAMBERS



No. 22 Admiralty Way, Lekki Phase 1

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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

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 FAILURE TO ALLOCATE LAND AFTER PAYMENT OF FULL LAND AND DOCUMENTATION FEES

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, particularly the subsidiary company involved in land transactions in Ibeju Lekki, Lagos, for failing to allocate land despite full payment for both the land and associated documentation.

FACTS OF THE CASE:

- 1. The alleged petitioner purchased **one** (1) **plot of land** from PWAN Group in **Ibeju Lekki**, **Lagos**.
- 2. Full payment was made for both:
 - o The cost of the land, and
 - The **required documentation fees** (typically including survey, deed of assignment, and allocation fee).
- 3. Despite fulfilling all financial obligations, the alleged petitioner has **not received physical allocation of the land** to date.
- 4. Multiple attempts to follow up have resulted in **no resolution**, and the petitioner has been left in uncertainty, unable to access or use the property.

APPLICABLE LEGAL BREACHES:

The ongoing failure by PWAN Group to fulfill its obligations constitutes:

- 1. Criminal Breach of Trust under Section 312 of the Criminal Code Act, Cap C38, LFN 2004
- 2. Obtaining by False Pretence under Section 419 of the Criminal Code Act
- 3. Violation of the **Federal Competition and Consumer Protection Act (FCCPA)** regarding fair service and product delivery

RELIEFS SOUGHT:

We respectfully request the following:

- 1. That your office **investigate PWAN Group** for breach of contract and possible fraudulent practices in land transactions.
- 2. That the company be compelled to **immediately allocate the purchased plot**, including the survey and title documentation already paid for.
- 3. If allocation is no longer feasible, we request a **full refund of the land and documentation fees** with applicable interest.
- 4. That **sanctions or regulatory oversight** be enforced to prevent recurrence of this pattern affecting other land buyers.

ATTACHED DOCUMENTS (if available):

- Contract of Sale
- Receipt for Land Payment
- Receipt for Documentation Fees

We request that this petition be treated with urgency to protect the rights and investments of citizens who have transacted in good faith.

Yours faithfully,

AKINOLA SAMUEL ELUYEFA ESO

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

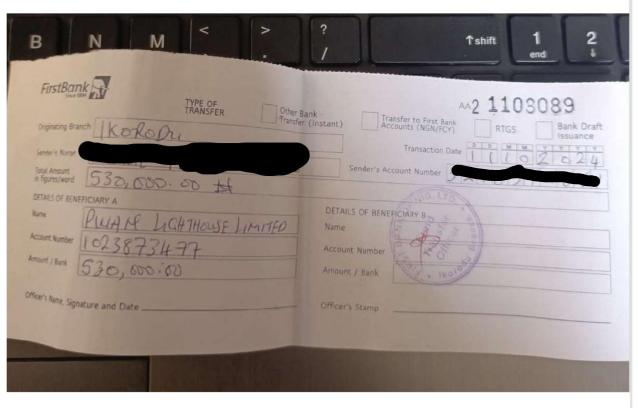
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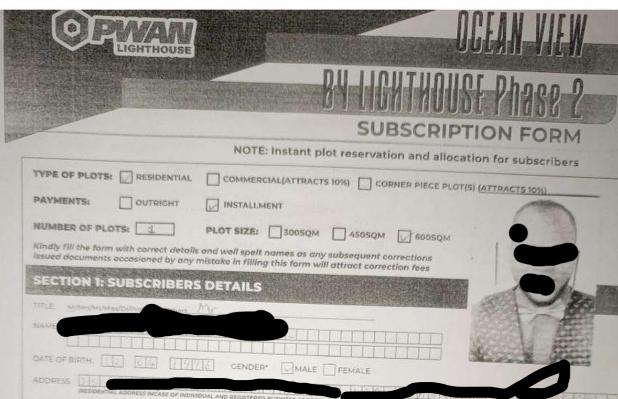
NGN530,000.00 Date: 11-OCT-2024

10:47:12 Desc:

PHUB:OUTWARD 0566234-0_PWAN

LIGHTHOUSE LI. Bal:





CONTRACT OF SALE

BETWEEN

PWAN LIGHTHOUSE LIMITED RC NO: 1751168 (VENDOR)

AND



IN RESPECT OF ONE (1) RESIDENTIAL PLOT OF LAND