



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 FOR FAILURE TO ALLOCATE LAND AFTER FULL
PAYMENT – ₦2,880,000**

We write on behalf of our client (hereinafter referred to as “the alleged petitioner”) to formally petition PWAN for breach of contract, misrepresentation, and financial misconduct in connection with the sale of a plot of land in Asaba, Delta State.

FACTS OF THE CASE:

- In 2022, the petitioner purchased **one plot of land** from PWAN in Asaba for the total sum of **₦2,880,000**
- Despite receiving a **physical land allocation letter** and providing proof of full payment via a **transfer receipt**, no actual land has been allocated to the petitioner.
- All attempts to reach PWAN and secure allocation have been met with persistent delays and unfulfilled promises, with no tangible progress to date.

APPLICABLE LEGAL BREACHES:

The actions and inactions of PWAN potentially violate:

- **Section 419 of the Criminal Code Act** – Obtaining money or property under false pretences.
- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust.
- Relevant **consumer protection laws**, including the right to transparent service delivery and fulfillment of contractual obligations.

RELIEFS SOUGHT:

We respectfully request that your office:

1. Investigate PWAN for potential fraud and breach of contract.
2. Prosecute any individuals or corporate officers found culpable.
3. Compel a **full refund of ₦2,880,000**, or enforce immediate allocation of the plot as agreed.
4. Take necessary measures to prevent the further exploitation of consumers by the said company.

ATTACHED DOCUMENTS:

- Physical Land Allocation Letter
- Transfer Receipt

Let me know if you'd like this exported as a Word or PDF file or included in a batch report with other petitioners.

Find attached

Yours faithfully,

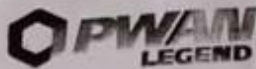


AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



Head Office:
House 11, Road 24, Ikota Villa Estate,
beside Mega Chicken, Ikota Lekki, Eti-Osa, Lagos
Asaba Office:
388 Nnebisi Road, Opposite Hopemark filling Station.
☎ 08180000783, 08188888861

31ST AUGUST 2023

[REDACTED]

DEAR ESTEEMED CLIENT,

PHYSICAL ALLOCATION NOTIFICATION LETTER

Please be informed that you are hereby notified of your physical allocation as follows:

LEGEND GARDENS ESTATE SCHEME 2, ASABA, DELTA STATE.

ESTATE NAME:

(AGASQAA) 1 RESIDENTIAL PLOTS

NO. OF PLOT(S):

BLOCK E PLOT 3.

PLOT DETAILS:

2ND SEPTEMBER 2023


DATE OF PHYSICAL ALLOCATION:

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

Thank you for choosing PWAN LEGEND REALTORS & INVESTMENTS LTD.

Yours faithfully,

DR. MICHAEL AFAM OKONKWO
MANAGING DIRECTOR

SIGNATURE & DATE:


Block B
Plot 3

✉ michael@pwanlegend.com

16:39



← reallocation le...



23A, Sura Majeji Street, Off Coler Road,
Lagos, Lagos.
+234 815 888 8492, +234 815 888 8493

August 28th, 2023

[Redacted]

Dear Sir,

RE-ALLOCATION NOTIFICATION/LETTER

We wish to sincerely apologise for the delay you have long experienced in commencing your project at Pearl City, Asaba, this is as a result of the little challenge we as a company have been trying to manage from our end to ensure that you have a seamless building/project experience.

However, we are still in the process of resolving this challenge and do not want to further delay you as we do not know the number of months it will take to get this challenge sorted, the reason for this reallocation.

We have decided to reallocate you to another estate in the same location where Pearl City, Asaba is located if you accept this letter.

Legend Gardens, Scheme 2 Asaba is located very close to the Admiralty Naval University, Ebusa, and 12 minutes away from Asaba Airport, 10 minutes' drive from the Koka Junction and very close to the CCECC Construction Company. It is currently selling for N2.5m per plot of 464sqm and has Deed of Assignment and Survey as its title. From the above description, you can agree with us that it has same features and landmarks as Pearl City, Asaba.

Legend Gardens, Scheme 2 Asaba is the estate we wish to reallocate you to as soon as this letter is accepted by you, your allocation details will be sent immediately and your documents prepared so that you can begin your project without further delays.

Once again, we wish to apologise for all the inconveniences this delay from our end must have caused you and we promise to assist you in any way we can as you begin your project in this new estate. The Management of PWAN-Legend will also be on ground to assist you in your project if need be.

Thank you for your patronage, your satisfaction is our priority always....

Thanking you for choosing **PWAN-PRIME INVESTMENTS AND PROPERTIES LTD.**

Yours Faithfully,


EJIROFOR MAXIMA C.
HEAD ADMIN DEPT.

info@pwanprime.com, pwanprime@gmail.com | www.pwanprime.com

...making home ownership dream a reality.



23A, Sura Mogaji Street, Off Coker Road,
Ibeju-Lekki, Lagos.
+234 818-888-8692, +234 818-888-8695

December 12TH, 2022

[REDACTED]

Dear Sir,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: Pearl City, Asaba

No of Plot(s): 1/464sqm

Plot Details: Block G1, Plot 1

Date of Allocation: December 16TH, 2022

PLEASE NOTE: This letter is temporary as you are expected to commence development on your plot within 6 months after your physical allocation. Failure to do that would result to reallocation of your plots to the rear part of the estate.


Therefore, the production of your Survey and Deed of Assignment will not be done until we see development on your land (**Please note that fencing of your plot is also recognized as part of development**). Kindly contact the office to request for fencing specifics.

All of these are necessary so as to drive massive development in our estate as we constantly move to achieve our vision of **"making home ownership dream a reality"**.

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

Thanking you for choosing **PWAN-PRIME INVESTMENTS AND PROPERTIES LTD.**

Yours Faithfully,


EJIOFOR MAXIMA C.
HEAD ADMIN DEPT.



ARINZE CHUKWUDUM AKONWU (MR.)
MANAGING DIRECTOR

14:44

LTE 41



file.pdf

1 of 1



Guaranty Trust Nigeria

Transaction Receipt

Transaction Date: 14 Apr 2023, 04:34 GMT+1

Reference Number: REF:233295727000004000002304140434

Sender: [REDACTED]

Transaction Amount: 400,000NGN

Amount In Words: Four Hundred Thousand Naira Only.

Transaction Type: To Other Bank (Instant)

Receiver: PWAN-PRIME INV AND PROP LTD A/C 2

Account Number: 1015520198

Receiving Bank: ZENITH BANK PLC

Remarks: 000013230414043427000120604206 Bal.of Chuson Steven Development of 800,000

DISCLAIMER

Your transfer has been successful and the beneficiary's account will be credited. However, this does not serve as confirmation of credit into the beneficiary's account. Due to the nature of the Internet, transactions may be subject to interruption, transmission blackout, delayed transmission and incorrect data transmission. The Bank is not liable for malfunctions in communications facilities not within its control that may affect the accuracy or timeliness of messages and transactions you send. All transactions are subject to verification and our normal fraud checks.

Generated from GTWorld



GTCCO

Guaranty Trust Nigeria

Transaction Receipt

Transaction Date: 06 Apr 2023, 08:06 GMT+1

Reference Number: REF:233295727000004000002304060806

Sender: [REDACTED]

Transaction Amount: 400,000NGN

Amount In Words: Four Hundred Thousand Naira Only.

Transaction Type: To Other Bank (Instant)

Receiver: PWAN-PRIME INV AND PROP LTD A/C 2

Account Number: 1015520198

Receiving Bank: ZENITH BANK PLC

Remarks: 000013230406080601000101481490 Part (½) payment for Pst Chuks Land development

DISCLAIMER

Your transfer has been successful and the beneficiary's account will be credited. However, this does not serve as confirmation of credit into the beneficiary's account. Due to the nature of the Internet, transactions may be subject to interruption, transmission blackout, delayed transmission and incorrect data transmission. The Bank is not liable for malfunctions in communications facilities not within its control that may affect the accuracy or timeliness of messages and transactions you send. All transactions are subject to verification and our normal fraud checks.

Generated from GTWorld

Transfer Receipt 58020293 E 80:2 d 62 9017 100

Transfer Type: Internal Transfer ☒ NEFT ☐ NIP ☐ CFTS ☐

Beneficiary Name: PWAD-PRIME INVESTMENT AND PROPERTIES LIMITED

Amount: N 1,080,000.00 Originating Branch: _____

Name of Sender: [REDACTED] Transaction Date: 29 08 2022
Day Month Year

Instant Transfer of Funds to other Banks Available on Internet banking and Bank 737

To register for Internet Banking, Simply Dial *737*6*58 or visit www.gtbank.com and click the register button on the Internet Banking Tab. 1075196021002

08 02:20