



**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 FOR FAILURE TO ALLOCATE LAND  
AFTER PAYMENT OF ₦2,700,000.00 (TWO MILLION, SEVEN HUNDRED THOUSAND  
NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, particularly its subsidiary **PWAN Homes**, over its persistent failure to fulfill contractual obligations regarding the allocation of land fully paid for in 2016.

**FACTS OF THE CASE:**

1. In 2016, the alleged petitioner entered into a land purchase agreement with PWAN Homes under an advertised payment plan:
  - Initially opting for a **12-month plan** totaling ₦3,000,000.00.
  - Later switching to a **3-month accelerated plan** for **₦2,700,000.00**, marketed as a discount for early payment.
2. The petitioner completed the entire ₦2,700,000.00 payment within the agreed 3-month period and received:
  - A **Deed of Land**,
  - **Payment Receipts**, and
  - **Written confirmation of the 3-month plan** being fulfilled.
3. PWAN Homes later requested further payments for:
  - **Physical allocation**, and
  - A **corner piece fee**—both of which the petitioner settled in full.

4. After these payments, PWAN Homes began delaying the allocation, citing land unavailability. Approximately a year later, a new excuse was introduced: that the land required **sand filling**, contradicting the original claim that it was **dry land**.
5. Under pressure, the petitioner made additional payments for sand filling. Despite this:
  - No land has been allocated to the petitioner to date.
  - Repeated follow-ups, including the engagement of legal counsel, have yielded no results.
  - The petitioner was denied opportunities to meet other buyers and was given evasive responses.
6. Only after encountering public awareness campaigns did the petitioner realize this might reflect **a broader pattern of deceptive conduct** by PWAN Group.

### **APPLICABLE LEGAL BREACHES:**

The conduct of PWAN Homes may amount to the following violations under Nigerian law:

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. **Federal Competition and Consumer Protection Act (FCCPA)** – Violation of consumer rights to fair service and truthful marketing.

### **RELIEFS SOUGHT:**

We respectfully request the following:


1. That your office **investigates PWAN Homes and PWAN Group** for breach of contract and possible large-scale fraudulent practices.
2. That all officers and agents involved be **prosecuted under the relevant sections of Nigerian law**.
3. That the petitioner be granted:
  - **Immediate physical allocation** of the land, or
  - **A full refund of ₦2,700,000.00**, along with all additional charges paid (for allocation and sand filling), plus accrued interest.
4. That appropriate **consumer protection measures and sanctions** be implemented to prevent similar misconduct in the future.

### **ATTACHED DOCUMENTS:**

- Deed of Land
- Receipts of Payment
- Confirmation of Payment Plan
- Allocation and Corner Piece Fee Receipts
- Communication Records

We urge your office to act promptly and decisively in this matter, not only for justice to be served in this individual case but also to protect other Nigerian citizens from such exploitative schemes.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*

< **Fwd: GeNS Transaction Alert [Debit:...** AA

05-Oct-2016

Dear [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 : \*\*\*\*\*9473  
Transaction Location:  
Description : NIBSS Instant Payment Outward  
Amount : 100,000.00  
Value Date : 05-Oct-2016  
000013161005023134000021214175  
Remarks : [REDACTED] TO FBN/PWAN  
[REDACTED]  
HOMES LTD from [REDACTED]  
OLAYINKA  
Time of Transaction : 2:31 AM  
Document Number : 0



**HEAD OFFICE:** No 6 Ogbeni Street, THERA ANNEX, off Lekki-Expressway-Epe, by Conoil Filling Station, beside Golden Park Estate, Ogidan, Ajah, Lekki, Lagos. Tel: +234 1 2956848  
**IKEJA OFFICE:** 16A Sule Abuka Close off Opebi Road by GTB, Opebi, Ikeja, Lagos. Tel: +234 1 2957206, Emails: pwanltd@yahoo.com, info@pwanhomes.com.

24th October, 2016

[REDACTED]  
Manchester

Dear Ma,

**ALLOCATION NOTIFICATION LETTER FOR ONE PLOT OF LAND AT LEKKI VILLA 1, IDOGUN ORISAFUNWA NEAR IGBOJIYA, BOGIJE, IBEJU LEKKI L.G.A.**

We write to notify you that One (1) plot of land shall be allocated to you at Lekki Villa Phase 1 Estate, Idogun Orisafunwa near Igbojiya via Bogije, Ibeju Lekki Local Government Area of Lagos State.

Please find below the description of the allocation:

**LOCATION:** Idogun Orisafunwa near Igbojiya via Bogije, Ibeju Lekki Local Government Area of Lagos State.

**SIZE:** One (1) plot of Undeveloped land measuring 648sqm.

**TITLE:** Undeveloped parcel of Land Excised by Lagos State Government.

You are required to make the following payments before your allocation:

1. **Provisional Survey Plan Fee:** To pay the sum of ₦50,000 only per plot, being the payment for your Provisional Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of ₦20,000 only per plot for your plot demarcation (4 Corner



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

DATE: 18TH NOV, 2016

Dear Valued Client,

[REDACTED]

**PHYSICAL ALLOCATION NOTIFICATION**

We wish to inform that you have been allocated as follows:

**Estate Name:** LEKKI VILLA PHASE 1

No of Plots: 1 PLOT

Plot Details: BLOCK 11 PLOT 10

Date of Allocation: 18TH NOV, 2016

Note that this letter is temporary pending the receipt of your survey plan.

Thanking you for confiding in us.

Yours faithfully,

  
TUNDE OLUWANIYI

ADMIN OFFICER  
AUTHORISED SIGNATORY

  
OBINNA NWOKOLO

HEAD, PROJECT  
AUTHORISED SIGNATORY

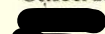



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

Sales Receipt


Sold to:



Date: October 24, 2016  
Receipt #:   
File #: 

Payment Method	Reconciling Bank	Land Location	DURATION		
FINAL	FBN	LEKKI VILLAS 1 Estate	3 MONTHS		
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	648 Sqm	Full Payment for One (1) plot of land at LEKKI VILLAS 1 Estate.	2,700,000.00		2,700,000.00



Amount in words: Two Million Seven Hundred Thousand Naira Only	Total Discount	Subtotal	2,700,000.00
		Sales Tax	
		Total	2,700,000.00
FOR PWAN HOMES LTD:	Signature		
Received By:	Signature		
Contact Address: 6, Ogbeni Street, By Golden Park Estate, Ogidan Sangotedo, Ajah – Lagos. 08029595951, 08121040406. Email Address: pwanltd@yahoo.com			



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

*Sales Receipt*

Sold to: 

Date: August 15, 2016  
 Receipt #:   
 File #: 

Payment Method	Reconciling Bank	Land Location	DURATION		
INSTALLMENT	FBN	LEKKI VILLAS 1 Estate	12 MONTHS		
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	648 Sqm	Further Installment Payment for One (1) plot of land at LEKKI VILLAS 1 Estate.	234,684.00		234,684.00
		Outstanding Balance	2,465,316.00		
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- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

*Sales Receipt*

Sold to: [REDACTED]

Date: September 6, 2016  
 Receipt #: [REDACTED]  
 File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	DURATION
INSTALLMENT	FBN	LEKKI VILLAS 1 Estate	3 MONTHS

Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	648 Sqm	Further Installment Payment for One (1) plot of land at LEKKI VILLAS 1 Estate.	153,000.00		153,000.00

**FOLKLAND PROPERTY DEVELOPMENT COMPANY LTD**

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**OFFICIAL RECEIPT**

Payment Date:	01 November 2016	No. [REDACTED]
Received from:	[REDACTED]	
Amount (N):	170,000.00	
Balance (N):		
The sum of:	One Hundred Seventy Thousand Naira Only.	

Payment Details:	FPDCL- DIAMOND BANK A/C
Cost (N)	Being for:
150,000.00	Provisional Survey Plan And Deed of Assignment for One (1) Plot of undeveloped land, located at Lekki Villa Estate, in Igbogiya, Bogije, Ibeju-Lekki L.G.A, Lagos State.
20,000.00	Plot Demarcation ( 4 Corner Piece) for One (1) plot, located at Lekki Villa Estate, in Igbogiya, Bogije, Ibeju-Lekki L.G.A, Lagos State.
For FPDCL LTD:	

Thank you for your patronage!





**CORPORATE HEAD OFFICE**  
Floor 1 to 5 PURI MALL BUILDING KM 25, Lekki Epe Expressway Opposite Former  
Lagos State University (LASU), Oko Ajo, Ajah, Lagos State.  
Telephone: +234-12956848  
E-mail: info@pwanhomes.com : pwanlimited@gmail.com  
Complaints: customercare@pwanhomes.com

**IKEJA OFFICE**  
No 16A, Sule Abuka Close Off Opebi Road, by GTBANK, Opebi Ikeja, Lagos  
Telephone: +234-12957205

**DATE: 3rd NOVEMBER, 2017.**

Dear Valued Client,

**LEKKI VILLA PHASE 1 STAKEHOLDERS' FORUM.**

In our bid to facilitate and hasten the infrastructural development and provisions in our aforementioned Estate (LEKKI VILLA PHASE 1 ESTATE), you are hereby invited to take part in our ongoing "LEKKI VILLA PHASE 1 STAKEHOLDERS' FORUM".

**DATE: MONDAY 20<sup>TH</sup> - SATURDAY 25<sup>TH</sup> NOVEMBER, 2017.**

**TIME: 10AM-4PM DAILY.**

**VENUE: HEAD OFFICE, KM 25 LEKKI-EPE EXPRESSWAY, PURI MALL BUILDING  
LEKKI AJAH, LAGOS.**

For inquiries please call: 09099999762

Thank you.

Yours faithfully

OBINNA NWOKOLO

General Manager.