



**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 HOMES FOR FRAUDULENT LAND SALE AND NON-ALLOCATION –  
₦930,000 TOTAL LOSS**

We write to formally petition **PWAN HOMES**, a subsidiary of PWAN GROUP, for engaging in deceptive land sale practices and breach of trust. Despite full payment for a residential plot and associated documentation at Flourish City Ode-Omi Estate Phase 2, **no land has been allocated** and no documentation delivered to our client to date.

**FACTS OF THE CASE**

- In 2022, our client purchased **one (1) plot of land measuring 600 square meters** located at **Flourish City Ode-Omi Estate Phase 2, Ibeju-Lekki Local Government Area, Lagos State**, from **PWAN HOMES**.
- The **total agreed payment** was **₦930,000.00**, broken down as follows:
  - **₦750,000** for the land
  - **₦180,000** for **Deed of Assignment, Provisional Survey, and Plot Demarcation**
- The full payment was completed within three (3) months, in good faith, via staggered installments.
- Despite completing the payment, our client has **not received any allocation letter, survey plan, deed of assignment, or site demarcation**.
- Several follow-up efforts and visits to the PWAN HOMES office have yielded **no concrete response, no**

**progress, and no refund**, raising serious concerns about fraudulent intent and systemic abuse of trust.

### **APPLICABLE LEGAL BREACHES**

The actions of PWAN HOMES and its representatives amount to:

- **Advance Fee Fraud** – Section 419, Nigerian Criminal Code
- **Criminal Breach of Trust** – Section 312
- **False Pretenses and Intent to Defraud**
- **Misrepresentation and Deceptive Conduct** – Section 14, FCCPA (2019)
- **Breach of Contract** – Failure to allocate land or provide agreed documents after full payment

### **RELIEFS SOUGHT**


We respectfully request the intervention of the appropriate regulatory and law enforcement agencies to:

1. **Investigate PWAN HOMES** and its officers involved in this land scheme at Flourish City Ode-Omi Phase 2.
2. **Compel immediate allocation** of the 600sqm plot along with full supporting documents (Survey Plan, Deed of Assignment, Allocation Letter).
3. Alternatively, **order a full refund** of **₦930,000.00** with **statutory interest and penalties**.
4. **Initiate prosecution** where applicable, and **sanction the company** for consumer fraud and abuse of public trust.

### **ATTACHED DOCUMENTS**

- **Receipts of payments made** for land and documentation

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

# CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD  
(THE VENDOR)

AND

MISS. [REDACTED]  
(THE PURCHASER)

IN RESPECT OF ONE (1) RESIDENTIAL PLOT OF LAND AT FLOURISH CITY ESTATE  
ODE OMI PHASE 2 SITUATE AT ODE – OMI AREA IN IBEJU LEKKI LOCAL  
GOVERNMENT AREA, LAGOS STATE



HEAD OFFICE: Box 1103 FUN Mile Estate, 94/25, Lekki Ex-Expressway, Ojo, Lagos State University (LASU), Ojo, Lagos  
REGA OFFICE: 16A, S/A Akoka Close, Off Oshodi Road by GTE, Ojo, Lagos State  
Tel: +234-2006645-224-1453300  
Email: info@pwanhomes.com

## Sales Receipt

Sold To:

[Redacted]

Date:

Aug 05, 2022

Receipt #:

[Redacted]

File #:

[Redacted]

Comment:

[Redacted]

| Payment Method | Reconciling Bank            | Estate                       | Duration |
|----------------|-----------------------------|------------------------------|----------|
| Outright       | 057150013 - Zenith Bank Plc | Flourish City Estate Odeom 2 |          |

| Description   | Line Total                             |
|---|--|
| Being full payment for 1.00 Unit(s) of [DOA] Deed of Assignment       | N 100,000.00                           |
| Being full payment for 1.00 Unit(s) of [PSV] Provisional survey       | N 50,000.00                            |
| Being full payment for 1.00 Unit(s) of [PD] Plot Demarcation          | N 30,000.00                            |
| Amount in words: One Hundred Eighty Thousand Naira and Zero Kobo Only |  |
|   | Subtotal<br>Tax<br>Total               |
|   | N 180,000.00<br>N 0.00<br>N 180,000.00 |

### Additional Information

Total Amount: N 180,000.00  
Outstanding Balance: N 0.00  
Size per Plot: 600 Sqm

FOR PWAN Homes Ltd:

OLUOMA NZENWUGO

Signature



## Sales Receipt



| Date: | Receipt #: | File #: | Comments: |
|-------|------------|---------|-----------|
|       |            |         |           |

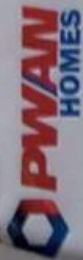
| Payment Method | Reconciling Bank | Estate                          | Duration   |
|----------------|------------------|---------------------------------|------------|
| Installment    | ZENITH BANK      | Pleasant City Estate, Oduduwo 2 | Indefinite |

| Description  | Line Total   |
|--|--|
| Being final payment for 1.00 Plate(s) of FGDQ-2) Flourish Cay Estate Gardens 2 | M 280,000.00   |
| Amount in words: Two Hundred Eighty Thousand Naira and Zero Kobo Only          | Subtotal<br>M 280,000.00<br>Tax<br>M 0.00<br>Total<br>M 280,000.00 |
| Additional Information   |  |
| Total Amount: M 750,000.00   |  |
| Outstanding Balance: M 0.00  |  |
| Size per Plot: 600 sqm.  |  |

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ARTTUFIOLA

[illegible]



HEAD OFFICE: Plot 1 to 5, PAFI Building, PHOS, Lokoja (Opp. Signpost), Okpara Lokoja, State University  
L.A.S.U., Oyo Axis, Apat, Lagos  
REGAL OFFICE: 10A Sun Road, Oshodi, Off Oshodi Road, Oshodi, Lagos  
Tel: +234-1-2559988 - 234-1-623889  
Email: info@pwanhomes.com

## Sales Receipt

Sold To:

Mr.

813

Mar 22, 2025

Date:

Receipt #:

File #:

Comment:

08184235634

| Payment Method | Reconciling Bank            | Estate                      | Duration |
|----------------|-----------------------------|-----------------------------|----------|
| Installment    | 087150013 - Zenith Bank Plc | Flourish City Estate Odem 2 | 3mths    |

| Description   | Line Total  |
|---|---|
| Being installment payment for 1.00 Plot(s) of [FCOD 2] Flourish City Estate Odem 2. | N 70,000.00   |
| Amount in words: Seventy Thousand Naira and Zero Kobo Only                          | Subtotal N 70,000.00<br>Tax N 0.00<br>Total N 70,000.00 |

### Additional Information

Total Amount: N 750,000.00  
Outstanding Balance: N 280,000.00  
Size per Plot: 500 sqm

FOR PWAN Homes Ltd:

SHITTU FIOLA

Signature





HEAD OFFICE: Plot 1 to 5, N1 Road Building, W4/26, Ladoke Akintola Expressway, Lagos State University  
(LASE), Ojo Area, Lagos.  
REGIONAL OFFICE: 106, Sani Abacha Close, Off Oshodi Expressway (ITH, Cypk, Kapa, I, 2000)  
Tel: +234-1-2520000, +234-14033000  
Email: info@pwanhomes.com

## Sales Receipt

Sold To:

[REDACTED]

Date:

Mar 21, 2022

Receipt #:

[REDACTED]

File #:

[REDACTED]

Comment:

[REDACTED]

| Payment Method | Reconciling Bank            | Estate                       | Duration |
|----------------|-----------------------------|------------------------------|----------|
| Installment    | 057150013 - Zenith Bank Plc | Flourish City Estate Odeom 2 | 3mths    |

| Description   | Line Total   |
|---|--|
| Being installment payment for 1,00 Plot(s) of [FGOD 2] Flourish City Estate Odeom 2       | N 100,000.00   |
| Amount in words: One Hundred Thousand Naira and Zero Kobo Only                            | Subtotal<br>N 100,000.00<br>Tax<br>N 0.00<br>Total<br>N 100,000.00 |
| Additional Information  |  |
| Total Amount: N 750,000.00<br>Outstanding Balance: N 350,000.00<br>Size per Plot: 600 sqm |  |

FOR PWAN Homes Ltd:

SHITU FIOLA

Signature





HEAD OFFICE: Floor 1 to 5 P/R Mill Building, KM25, Lekki Expressway, Opposite Lagos State University (LASU), Ojo-Ado, Ajah, Lagos  
REGIONAL OFFICE: 16A Sule Abulata Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos  
Tel: +234-12568848, +234-14533609  
Email: info@pwanhomes.com

## Sales Receipt

Sold To:

Date:

Receipt #:

File #:

Comments:

| Payment Method | Reconciling Bank            | Estate                         | Duration |
|----------------|-----------------------------|--------------------------------|----------|
| Installment    | 057150013 - Zenith Bank Plc | Flourish City Estate Ode Omi 2 | 3mths    |

| Description  | Line Total            |
|--|-----------------------|
| Being initial payment for 1.00 Plot(s) of [FCOD 2] Flourish City Estate Odeomi 2 | N 300,000.00          |
| in words: Three Hundred Thousand Naira and Zero Kobo Only                        |                       |
|  | Subtotal N 300,000.00 |
|  | Tax N 0.00            |
|  | Total N 300,000.00    |

### Additional Information

Total Amount: N 750,000.00  
Outstanding Balance: N 450,000.00  
Size per Plot: 600 sqm

FOR PWAN Homes Ltd:

Nweke Gideon

Signature