

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 ₦1,650,000.00 (ONE MILLION, SIX HUNDRED AND FIFTY
THOUSAND NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, particularly in respect of **Lekki Villa Phase One, Bogije, Ibeju-Lekki LGA**, for its failure to deliver land allocation despite full payment and issuance of allocation documentation.

FACTS OF THE CASE:

1. In **2015**, the alleged petitioner made full payment of **₦1,650,000.00** (One Million, Six Hundred and Fifty Thousand Naira Only) for the purchase of a plot of land located at **Lekki Villa Phase One**, situated in **Bogije, Ibeju-Lekki Local Government Area**, Lagos State.
2. Following this payment, PWAN Group issued:
 - o **Sales Receipt**
 - o **Physical Allocation Document**
3. However, despite being issued the above documents, **no actual land has been allocated** to the petitioner to date.
4. The petitioner has made multiple **follow-up visits and calls** to PWAN offices over the years, only to be met with repeated **excuses and shifting narratives**.
5. This prolonged delay constitutes a **breach of contractual agreement** and is evidence of possible misrepresentation or intent to defraud.

APPLICABLE LEGAL BREACHES:

PWAN Group's actions are potentially in violation of the following provisions of 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 by false pretences.
3. **Breach of Contract under Nigerian Civil Law** – Non-performance after receipt of consideration.
4. **Nigerian Consumer Protection Framework** – Duty to deliver paid-for services and fair treatment.

RELIEFS SOUGHT:

We respectfully request that your office:

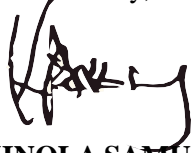
1. **Investigate** PWAN Group for breach of contractual obligations regarding Lekki Villa Phase One, Bogije.
2. **Prosecute responsible officers** of the company if fraudulent misrepresentation or criminal breach of trust is established.
3. Compel PWAN Group to **either allocate the agreed plot of land** immediately or issue a **full refund of ₦1,650,000.00** with appropriate interest.
4. Impose **sanctions or regulatory enforcement** to protect other citizens from such exploitative practices.

ATTACHED DOCUMENTS:

- Sales Receipt
- Allocation Letter

We trust this complaint will be given prompt attention in the interest of justice, consumer protection, and public accountability.

Yours faithfully,





AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

 PWAN HOMES <small>making home ownership dreams a reality</small>		<ul style="list-style-type: none">■ Real Estate & Property Development■ Consultancy■ Land Survey■ Logistics			
Sold to: [REDACTED]		Sales Receipt			
09091748801		Date:	September 16, 2015		
		Receipt #:	[REDACTED]		
		File #:	[REDACTED]		
Payment Method	Reconciling Bank	Land Location			
OUTRIGHT	ZENITH BANK	Lekki Villa Estate			
Qty	Size #	Description	Amount	Discount	Line Total
1.00	675 Sqm	Full Payment for One(1) plot of land at Lekki Villa Estate.	1,650,000.00		1,650,000.00
		Commercial			

Amount in words: One Million, Six Hundred and Fifty Thousand Naira Only	Total Discount	Subtotal	1,650,000.00
		Sales Tax	
		Total	1,650,000.00
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			

CONTRACT OF SALE

BETWEEN


PWAN HOMES LTD
(THE VENDOR)

AND

[REDACTED]
(THE PURCHASER)

IN RESPECT OF ONE (1) PLOT OF LAND AT LEKKI VILLA PHASE 1 SITUATE AT BOGILE, IN IBEJU-LEKKI LOCAL GOVERNMENT AREA, LAGOS STATE

Prepared by,
Amarachi Ezimano (Barr)
Legal Practitioner
c/o PWAN Homes Ltd.
No. 6, Ogbeni Street by Golden Park Estate,
Ogidan, Sangotedo,
Ajah,
Lagos State
234-8029595951
legal@pwanhomes.com





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

DATE: 5TH APRIL, 2017

Dear Valued Client,



PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: LEKKI VILLA PHASE 1 ESTATE

No of Plots: 1 PLOT


Plot Details: BLOCK E PLOT 15

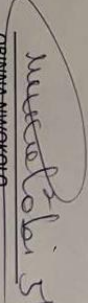
Date of Allocation: 5TH APRIL, 2017

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

Thanking you for confiding in us.

Yours faithfully,


05/04/2017
TUNDE OLUWANIYI
AUTHORISED SIGNATORY


OBINNA NWOKO
AUTHORISED SIGNATORY