



To:

The Officer-in-Charge
Economic and Financial Crimes Commission (EFCC)
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Ikoyi, Lagos
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CC:

The Managing Director
PWAN Group
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Nigeria
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PETITION AGAINST PWAN GROUP FOR FAILURE TO REFUND ₦1,000,000.00 (ONE MILLION NAIRA ONLY) AFTER FAILED LAND TRANSACTION

We write on behalf of our client (hereinafter referred to as “**the petitioner**”) to formally petition **PWAN Group**, specifically its subsidiaries **PWAN HOMES** and **PWAN Max**, for their continued refusal to refund the sum of ₦1,000,000.00 (One Million Naira Only) following a failed land purchase transaction.

FACTS OF THE CASE:

1. In 2023, the petitioner, a Nigerian citizen residing in the Middle East, agreed to purchase a property from PWAN Group based on his wife's persuasion. The initial property was advertised at **₦7.5 million**, and he immediately transferred **₦6 million** to his wife, who in turn made payment to PWAN.
2. PWAN gave a 3-month grace period to pay the outstanding **₦1.5 million**. Between **June and August 2023**, the petitioner completed the balance, making the **full payment of ₦7.5 million**.
3. On the day of completing the **₦7.5M** payment, PWAN introduced a second property costing **₦2.5 million**, and the petitioner's wife made a **₦1 million deposit**, with a verbal understanding that the balance could be paid in installments.
4. However, two months after the initial payment was completed, the petitioner had **still not received an allocation** for the fully-paid first property, prompting concerns and repeated follow-ups.

5. Following heated exchanges and numerous attempts to resolve the matter, **PWAN refunded only ₦6.5 million**, corresponding to the cost of the initial property. The **₦1 million deposit for the second property was not refunded**, despite:
 - No allocation ever being made;
 - PWAN admitting that the estate had been sold out;
 - Multiple formal refund requests via email.
6. To date, **PWAN has refused to refund the ₦1,000,000**, giving neither communication nor assurance, causing financial loss, emotional distress, and psychological trauma to the petitioner, especially considering that the funds were hard-earned and sent from abroad.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN and its representatives potentially violates several Nigerian laws and regulations, including:

1. **Section 419 of the Criminal Code Act** – Obtaining property under false pretenses.
2. **Section 312 of the Criminal Code Act** – Criminal breach of trust.
3. **Consumer Protection Frameworks** – Breach of contract and failure to deliver paid-for services.
4. **Money Laundering (Prohibition) Act** – Possession of unremitted funds arising from a non-executed contractual transaction.

RELIEFS SOUGHT:

In view of the facts stated, we humbly request the following:

1. An urgent **investigation** into the land sale and refund practices of PWAN Group and its subsidiaries.
2. **Immediate refund of the ₦1,000,000.00** (One Million Naira) paid for the unallocated and unavailable second property.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

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