



07077513836



eluyefachambers@gmail.com

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 (DIAMOND PHASE 2 ESTATE, IBEJU LEKKI, LAGOS STATE) FOR FRAUD, NON-ALLOCATION OF LAND, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦8,500,000

We act as solicitors to the Petitioner, hereinafter referred to as “**our client**”, and on their behalf lodge this formal complaint against **PWAN Group** and its agents responsible for the marketing and sale of plots at **Diamond Phase 2 Estate**, Ibeju Lekki, Lagos State.

FACTUAL SUMMARY

1. In or around **2022**, our client purchased a plot of land priced at **₦8,500,000** at **Diamond Phase 2 Estate**, Ibeju Lekki, Lagos State.
2. The total sum of **₦8,500,000** was duly paid to PWAN Group in good faith.
3. Despite repeated follow-ups, PWAN Group has **failed, refused, and neglected** to physically allocate the land or process any refund.

4. Our client relied on PWAN's representations that the land was available and free from encumbrances.
5. PWAN's continued withholding of the paid sum without delivering the property or refund constitutes fraud and breach of trust.
6. This has caused our client serious financial loss, emotional distress, and loss of investment opportunities.

CRIMINAL OFFENCES DISCLOSED

The actions of PWAN Group and its agents constitute the following offences under Nigerian law:

- **Obtaining by False Pretence and Advance Fee Fraud** – contrary to Section 1(1)(a) & (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006;
- **Criminal Breach of Trust** – contrary to Section 312 of the Criminal Code Act;
- **Conspiracy to Defraud** – contrary to Section 516 of the Criminal Code Act;
- **Fraudulent Concealment / Misrepresentation** – contrary to Section 14 of the Federal Competition and Consumer Protection Act (FCCPA), 2019.

PRAYERS

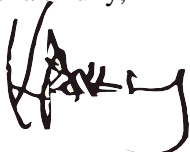
In light of the above, we respectfully request that your office:

1. **Commence an urgent criminal investigation** into the fraudulent conduct of PWAN Group and its agents in relation to Diamond Phase 2 Estate.
2. Prosecute all responsible parties for obtaining money by false pretence and failure to deliver on contractual obligations.
3. Recover and refund the sum of **₦8,500,000** to our client immediately.
4. Compel PWAN Group to halt further marketing or sale of plots at Diamond Phase 2 Estate until all valid allocations and refunds are settled.
5. Award appropriate compensation to our client for financial hardship and emotional distress.
6. Take further regulatory action to protect other innocent buyers from similar fraudulent schemes.

Supporting Documentation:

Our client is prepared to provide evidence of payments, communications, and any related documents to support this petition and assist your investigation.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

Dear Sir,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦300, 000.00 (Three Hundred Thousand Naira)** only, being part- payment for One (1) plot measuring **600 square meters** of land, in **HECTARES OF DIAMOND PHASE 2 ESTATE**, situate at Sangotedo Village, behind Monastery in Eti-Osa Local Government Area, Lagos State.

The total cost of the plot as at the date of this payment is **₦8, 500, 000 (Eight Million, Five Hundred Thousand Naira)** only, for the Twelve months scheme.

The expected balance is **₦8, 200, 000.00 (Eight Million, Two Hundred Thousand Million)** only.

You are expected to pay **₦683, 334.00 (Six Hundred and Eighty-Three Thousand, Three and Thirty-Four Naira)** Monthly, before the end of every month starting from the month of October, 2017 which is to offset the remaining balance of **₦8, 200, 000.00 (Eight Million, Two Hundred Thousand Million)** only.

(Note that any default in your payment shall attract extra charges).

Thank you very much for subscribing to **HECTARES OF DIAMOND PHASE 2 ESTATE** through **PWAN Homes Ltd.**

Yours sincerely,



📍 Floor 1-5 Puri Mall Building, Km 25, Lekki Epe Expressway
Opposite Leawood Hotel (See Centre)
Oko Ado, Ajah, Lagos State
☎ +234-1-2956848, 234-14534177, 234-14533664

DATE: [REDACTED]
FILE #: [REDACTED]

NAME: [REDACTED]
[REDACTED]

Dear Valued Client,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name:	HECTARES OF DIAMOND 2 ESTATE
No of Plots:	1 PLOT (RESIDENTIAL)
Plot Details:	BLOCK J PLOT 17
Plot Size:	600 SQMS



HEAD OFFICE Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr. [REDACTED]

United Kingdom
[REDACTED]

Date: [REDACTED]

Receipt #: [REDACTED]

File #: [REDACTED]

Comment:

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being initial payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 300,000.00	
Amount 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 8,500,000.00

Outstanding Balance: N 8,200,000.00



HEAD OFFICE Floor 1 to 5 FUR Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr

IKHELE...

Date:

Dec 16 2019

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1.00 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	N 500,000.00
	Tax	N 0.00
	Total	N 500,000.00

Additional Information
Total Amount: N 8,500,000.00 Outstanding Balance: N 3,700,000.00 Size per Plot: 600 sqm



HEAD OFFICE: Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr

[REDACTED]

United Kingdom

[REDACTED]

Date:

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	₦ 500,000.00
	Tax	₦ 0.00
	Total	₦ 500,000.00

Additional Information

Total Amount: ₦ 8,500,000.00

Outstanding Balance: ₦ 5,200,000.00

Plot Size: 600 Sqm



HEAD OFFICE Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[REDACTED]

United Kingdom

Date:

Receipt #:

File #:

Comment:

11/15/2010
[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	₦ 500,000.00
	Tax	₦ 0.00
	Total	₦ 500,000.00

Additional Information

Total Amount: ₦ 8,500,000.00
Outstanding Balance: ₦ 4,200,000.00
Plot Size: 600 Sqm



HEAD OFFICE: Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12356848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr [REDACTED]
[REDACTED]
United Kingdom
[REDACTED]

Date:

Receipt #:

File #:

Comment:

[REDACTED]
[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	₦ 500,000.00
	Tax	₦ 0.00
	Total	₦ 500,000.00

Additional Information

Total Amount: ₦ 8,500,000.00
Outstanding Balance: ₦ 5,700,000.00
Plot Size: 600 Sqm

Sales Receipt

Sold To:

Mr

36112

United Kingdom

Date:

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	N 500,000.00
	Tax	N 0.00
	Total	N 500,000.00

Additional Information

Total Amount: N 8,500,000.00

Outstanding Balance: N 6,200,000.00

Plot Size: 600 Sqm

FOR PWAN Homes Ltd:

Okoh Lawrence



HEAD OFFICE Floor 1 to 5 FRI Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12966848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr

[REDACTED]

United Kingdom

Date:

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	N 500,000.00
	Tax	N 0.00
	Total	N 500,000.00

Additional Information

Total Amount: N 8,500,000.00
Outstanding Balance: N 7,200,000.00
Plot Size: 600 Sqm



HEAD OFFICE: Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Abuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr

[REDACTED]

United Kingdom

[REDACTED]

Date:

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	N 500,000.00
	Tax	N 0.00
	Total	N 500,000.00
Additional Information		
Total Amount: N 8,500,000.00		



HEAD OFFICE Room 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE 16A Sule Abuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12966848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr

[REDACTED]
36 TALLE COURT BRISBANE

United Kingdom

Date:

Receipt #:

File #:

Comment:

Nov 05 2018

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being Installment payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	N 500,000.00
	Tax	N 0.00
	Total	N 500,000.00
Additional Information		
Total Amount: N 8,500,000.00		
Outstanding Balance: N 6,700,000.00		



HEAD OFFICE: Floor 1 to 5 Puri Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Abaka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanihomes.com

Sales Receipt

Sold To:

M. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Date:

Receipt #:

File #:

Comment:

[REDACTED]
[REDACTED]
[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	₦ 500,000.00
	Tax	₦ 0.00
	Total	₦ 500,000.00

Additional Information

Total Amount: ₦ 8,500,000.00
Outstanding Balance: ₦ 4,700,000.00
Plot Size: 600 Sqm



HEAD OFFICE: Floor 1 to 5 Furi Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IBERIA OFFICE: 16A, Sule Abaka Close, Off Opebi Road by GTE, Opebi, Ikeja, Lagos
Tel: +234-12958848, +234-14533689
Email: info@pwanhomes.com

Sales Receipt

Sold To:

M. [REDACTED]
[REDACTED]
United Kingdom
[REDACTED]

Date:

Receipt #:

File #:

Comment:

M. [REDACTED]
[REDACTED]
[REDACTED]

Payment Method	Reconciling Bank	Estate	Duration
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 1.00 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 1,500,000.00	
Amount in words: One Million, Five Hundred Thousand Naira and Zero Kobo Only	Subtotal	₦ 1,500,000.00
	Tax	₦ 0.00
	Total	₦ 1,500,000.00

Additional Information

Total Amount: ₦ 8,500,000.00
Outstanding Balance: ₦ 200,000.00
Size per Plot: 600 sqm



HEAD OFFICE: Floor 1 to 5 Furi Mall Building, KM 25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Aja, Lagos
IKEJA OFFICE: 16A Sule Abaka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12966848, +234-14533689
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr

[REDACTED]

[REDACTED]

[REDACTED]

United Kingdom

+44

Date:

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Installment	ZENITH BANK	Hectares of Diamond 2	12 Mths

Description	Line Total
Using installment payment for 1.00 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 1,000,000.00
Amount in words: One Million Naira and Zero Kobo Only	
	Subtotal
	Tax
	Total

Additional Information
Total Amount: ₦ 8,500,000.00
Outstanding Balance: ₦ 2,700,000.00
Size per Plot: 600 sqm

CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD
(THE VENDOR)

AND

~~THE PURCHASER~~
(THE PURCHASER)

IN RESPECT OF ONE (1) RESIDENTIAL CORNER PIECE PLOT OF LAND AT HECTARES
OF DIAMOND PHASE 2 ESTATE SITUATE AT SANGOTEDO VILLAGE, BEHIND
MONASTERY IN ETI-OSA LOCAL GOVERNMENT AREA, LAGOS STATE.

THIS AGREEMENT is made this 31ST day of August, 2022

BETWEEN

PWAN HOMES LTD a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its office at Puri Mall Building, Floor 1-5, KM 25, Lekki-Epe Expressway, Opposite Leewood Hotel, Sangotedo, Lekki, Lagos State (hereinafter referred to as **'THE VENDOR'** which expression shall wherever the context so admits include its assigns, legal representatives and successors-in-title) of the one part.

AND

[REDACTED] (hereinafter referred to as **'THE PURCHASER'** which expression shall wherever the context so admits include his heirs, assigns and legal representatives) of the other part.

WHEREAS:

1. The Vendor is a real estate Marketing and Investment Company engaged in the acquisition of tracts of land and development of estates which is laid out into schemes and gated estates and are thereafter allocated to Subscribers to the Schemes.
2. The Vendor has acquired a vast tract of land measuring **600 square meters each** per plot situate and described as **HECTARES OF DIAMOND PHASE 2 ESTATE**.
3. The Vendor with intent to achieve its object of development of Schemes has procured **HECTARES OF DIAMOND PHASE 2 ESTATE** hereinafter referred as 'the Scheme', whereby interested person (s) or organization subscribes to the Scheme by way of monthly, quarterly contribution or outright payment towards ownership of plot(s) of land within the Scheme.

IT IS HEREBY AGREED that the Purchaser has fully subscribed to One (1) Residential Plot of land

5. **THE PURCHASER HEREBY COVENANTS WITH THE VENDOR** as follows:
- To pay for his Survey and legal fees in respect of the **One (1) Residential Plot** of land.
 - If the PURCHASER wishes to withdraw from this scheme at any time before taking possession:
 - To give a notice of 90 days, and 60 days thereafter if the refund is not ready at the expiration of the 1st notice.
 - An administrative charge of 10% and 30% Agency fee shall be deducted.
6. **IT IS HEREBY FURTHER** agreed that:
- Having briefed the Purchaser (in the FAQ and otherwise), the Purchaser is fully aware of the status of the land and has agreed to purchase the land as it is.
 - Both parties covenant to uphold these presents.

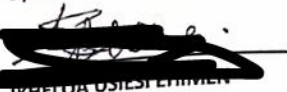
IN WITNESS WHEREOF, the Parties have hereto set their hand and sealed this day and year first above written.

THE COMMON SEAL of THE VENDOR is affixed
PWAN HOMES LTD
IN THE PRESENCE OF:


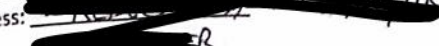


DIRECTOR


SECRETARY

SIGNED, SEALED AND DELIVERED
By the within named 'PURCHASER'


IKHELOA USIENI

In the presence of:

Name: 
Address: 
Occupation: 
Signature: 