



**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 ONE (1) RESIDENTIAL PLOT FULLY PAID FOR AT PHPAC ESTATE 2, IBEJU-LEKKI - ₦1,350,000**

We write on behalf of our client (hereinafter referred to as “**the Petitioner**”) to formally petition **PWAN Group** for **breach of contract, fraudulent misrepresentation, and deliberate refusal** to allocate **one (1) residential plot of land** fully paid for since **2015** at **PHPAC Estate 2, Ibeju-Lekki, Lagos State**.

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### **FACTUAL SUMMARY**

1. In **2015**, the Petitioner purchased **one (1) residential plot of land** at **PHPAC Estate 2, Ibeju-Lekki, Lagos State**, marketed and sold under PWAN Group’s real estate scheme.
2. The Petitioner paid a total sum of **₦1,350,000 (One Million, Three Hundred and Fifty Thousand Naira Only)** covering the full purchase price and initial documentation fees.
3. PWAN Group issued receipts and/or a Contract of Sale acknowledging payment and promised **prompt physical allocation** of the plot.
4. Since payment, the Petitioner has not been physically allocated any plot or given valid title documents.
5. Despite repeated follow-up visits, calls, and written requests, PWAN Group has only given **vague excuses and shifting promises** but no genuine allocation or refund.

6. To date, the Petitioner remains without land, valid possession, or refund — resulting in significant **financial loss, wasted time, and hardship**.
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## ALLEGED OFFENSES

The conduct of **PWAN Group** in this matter amounts to:

- **Breach of Contract** — for failing to allocate the plot as agreed;
  - **Obtaining Money Under False Pretences** — contrary to **Section 419 of the Criminal Code Act**;
  - **Criminal Breach of Trust** — contrary to **Section 312 of the Criminal Code Act, Cap C38, LFN 2004**;
  - **Conspiracy to Defraud** — contrary to **Section 516 of the Criminal Code Act**;
  - **Unfair Trade Practices and Misrepresentation** — contrary to the **Federal Competition and Consumer Protection Act (FCCPA), 2019**;
  - **Advance Fee Fraud** — contrary to the **Advance Fee Fraud and Other Fraud Related Offences Act, 2006**.
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## RELIEFS SOUGHT

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

1. Conduct a **full investigation** into **PWAN Group**, its directors, managers, and field agents responsible for marketing and selling plots at **PHPAC Estate 2**, Ibeju-Lekki.
  2. Compel PWAN Group to either:
    - **Immediately allocate** the fully paid-for residential plot with valid title documentation and physical possession; or
    - Refund the total sum of **₦1,350,000**, with accrued interest and compensation for wasted time and financial loss.
  3. Prosecute any officers or agents found culpable of fraudulent misrepresentation or misuse of the Petitioner's funds.
  4. Enforce strong **regulatory oversight** to protect other unsuspecting buyers from similar exploitation.
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## ATTACHED DOCUMENTS

- Receipts and/or Contract of Sale showing payment of **₦1,350,000**;

Yours faithfully,




**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*

	<small>9 Floor 1 - 5 Puri Mall Building, Km 25, Lekki Epe Expressway Opposite Leawood Hotel (See Centre) Oko Ajo, Ajah, Lagos State</small>
DATE: [REDACTED]	56848, 234-14534177, 234-14533664
FILE #: [REDACTED]	
[REDACTED]	
Dear Valued Client,	
<b><u>PHYSICAL ALLOCATION NOTIFICATION</u></b>	
You are hereby notified of your allocation as follows:	
<b>Estate Name:</b>	PHPAC ESTATE PHASE 2
<b>No of Plots:</b>	4 PLOTS (4 RESIDENTIAL)
<b>Plot Details:</b>	BLOCK I PLOT 10, 12, 14, 16
<b>Plot Size:</b>	2700 SQMS
<b>Date of Allocation:</b>	8TH JANUARY, 2021

## LETTER OF ACKNOWLEDGEMENT

Yours sincerely,

[illegible]





HEAD OFFICE: No 6 Ogbeni Street, THERA ANNEX, off Lekki-Expressway-Epe,  
by Conoil Filling Station, beside Golden Park Estate, Ogidi, 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, Email: pwanitd@yahoo.com, info@pwanhomes.com.

Dear [REDACTED],

**ALLOCATION LETTER TO 4 PLOTS OF LAND AT PHPAC ESTATE ELERANIGBE AREA, EPE LGA**

Congratulations Sir, 4 plots of land has been allocated to you in Phpac Estate, Eleranigbe, Epe Local Government Area of Lagos State:

Please find the description of the allocation below:

**LOCATION:** Eleranigbe Ibeju Lekki Area of Lagos State

**SIZE:** Four Plots of Undeveloped land measuring 60ft by 120ft each.

**TITLE:** Undeveloped parcel of Land presently going through the process of excision in Ministry of lands, Alausa, Lagos state.

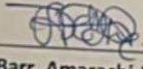
Kindly pay the sum of N50,000 only per plot for the **Provisional Survey Plan** in your name, N50,000 only per plot for Legal and Signing fee for your **Deed of Assignment** and N30,000 only per plot for Clearing of the land making a total sum of **N130,000** only into any **Diamond Bank** Account Name: **Folkland Property Development Company**, Account Number: **0035628388**. (For 2-5 plots pay N80,000 only per plot and for 6 plots and above, pay N70,000 only per plot).

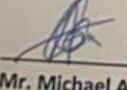
**Plot Demarcation (4 Corner Piece) fee:** N20,000. Payable into the same Bank Account.

As soon as this is done, your Deed of Assignment with your provisional Survey Copies containing full details of your plot will be made available to you.

Thank you so very much for partnering with us to make home ownership dreams a reality for as many people as we possibly can.

Sincerely,

 27th April 2015  
**Barr. Amarachi Janice Ezimano**  
Manager (Pwan Homes Ltd)

 27th April 2015  
**Mr. Michael Afam Okonkwo**  
Executive Director (Pwan Homes Ltd)

P.S: Vehicles will be available on daily basis except on Sundays from Monday the 11<sup>th</sup> of May, 2015 in the Folkland Property Development Company Office at No 6, Ogbeni Street, Beside Golden Park Estate by Conoil Filling Station, Sangotedo, to take you to the land for physical allocation of your plot. Please call Mr. Mike Okonkwo on 0818888861 to schedule a date that is convenient for you.



OFFICE: 1st/2nd, 15th-16th Floor, Oceanic Centre (Old) Plot 150  
P.O. Box 100, Lagos, Nigeria, 100001  
Tel: +234 800 000 0000 | +234 800 000 0000  
Email: [info@pwanimax.com](mailto:info@pwanimax.com)

## Sales Receipt

Sold To: ORPOTO OCHENIMAMO OKEVADIGHE  
NO 15 CLARKSON STREET,  
NEW LAGOS TIA ROAD (TIA ROAD)  
(807321940)

Date: Aug 20, 2020  
Receipt #: 478/2020/0001  
File #: Pwani/Max/00000000  
Comment:

Payment Method	Receiving Bank	Quantity	Estimate	Duration
Outright	Quantity Trust Bank	1	Max Villa, Lagos	
Description				Line Total
Being payment for One (1) plot of Land at Max Villa, Lagos				N 750,000.00
Amount in words: Seven Hundred and Fifty Thousand Naira Only.				
				Subtotal
				Tax
				Total
				N 750,000.00
Additional Information:				
Total Amount:				N 750,000.00
Outstanding Balance:				N 0.00
Note per Plot:				400sqm

FOR PWANI Max Properties and Business Solution
Hubert Sherdeen
Signature


...making home ownership dreams a reality

[www.pwanimax.com](http://www.pwanimax.com)



QJ AND MARC BUSINESS COMPLEX, KM 42  
LEKO EPE EXPRESSWAY, OPPOSITE CHILDREN'S  
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS  
08180000652, 07064000781

OCTOBER 13, 2021

[REDACTED]

Dear Valued Client,

**UPDATE ON ALLOCATION ACTIVITIES AT MAX VILLE PHASE I,  
ASABA**

We want to use this opportunity to express our gratitude to you for choosing to purchase your property from us at PWAN Max. We acknowledge your cooperation and patience with us since we embarked on this mutually beneficial relationship of making your home ownership dream a reality.

However, we apologize for the unintended delay in the allocation of your plot(s) in the estate. The physical allocation exercise was initially scheduled to commence this month, unfortunately, it has hitherto, been affected by the resultant effect of the incessant rainfall that has characterized this season.

Nevertheless, we have decided to give this update as to the allocation of plots in the estates, in order to reassure you of our commitment towards a quick and reliable allocation of your plot(s). Thus, we crave your indulgence to please bear with us a little longer, as we work towards carrying out the physical allocation of your plots as soon as the raining season phases off, this will be between November (2021) and January (2022), kindly remember that allocation is also in Batches and on first come first served basis.

We wish to reiterate our commitment to the vision of making home ownership dream a reality of as many people as possible in Nigeria and Africa. Thank you

AUG 20<sup>th</sup>, 2020

[REDACTED]

Dear Sir

**PAYMENT NOTIFICATION LETTER**

Sequel to the receipt of your payment of N 750,000.00 for One (1) Residential Plot in Max Ville at Admiralty Road, Umuedi, Off Ibusa Expressway, Asaba area of Delta State.

Please find below the description of the allocation:

**LOCATION:** Umuedi Village, Admiralty Drive, Asaba, Delta State.

**QUANTITY:** One (1) Residential Plot of Undeveloped land

**TITLE:** Undeveloped parcel of Land presently under customary ownership at the Ministry of lands, Asaba, Delta State.

You are required to make the following payments:

- **Survey Fee:** To pay the sum of N 150, 000 only per plot, being the payment for your Survey Plan to be made in your name.
- **Plot Demarcation Fee:** To pay the sum of N30,000 only per plot for your plot demarcation.
- **Deed of assignment:** To pay the sum of N100,000 only per plot for your deed of assignment.
- **Development levy:** To pay the sum of N500,000 only per plot for your development levy. Payment shall be made into any Guarantee Trust Bank branch. Account Name: PWAN MAX PROPERTY AND BUSINESS SOLUTION, Account Number: GTB: 0509546334

Your provisional Survey Copies containing full details of your plot shall be made available to you after your physical allocation.

Thank you so very much for partnering with us to make home ownership dreams a reality for as many people as we possibly can.