



**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 FOR FAILURE TO ALLOCATE LAND AT OPEN HEAVENS ESTATE, ELERANIGBE, IBEJU LEKKI – TOTAL AMOUNT ₦2,835,000**

We write to lodge a formal **petition against PWAN Group for fraudulent breach of contract, misrepresentation, and failure to deliver promised property allocation**, even after full payment was made over **eight (8) years ago**.

**FACTS OF THE CASE:**

- In **2017**, the petitioner's daughter purchased a land package from **PWAN at Open Heavens Estate**, located in **Eleranigbe, Ibeju-Lekki, Lagos State**.
- The purchase was under a **"Buy 2, Get 1 Free"** promotional offer. The total cost of ₦2.7 million was **paid in full**.
- One of the plots obtained under this offer was **transferred to the petitioner**, for which the petitioner **paid an additional ₦135,000** for documentation, making a total sum of **₦2,835,000**.
- Since the payment, **no land has been allocated**, and **no physical access has been granted**.
- Despite **multiple visits to PWAN's offices**, the petitioner has been **tossed from one representative to another**, with **no resolution, refund, or documentation**.
- The petitioner is **67 years old**, and this prolonged delay has **caused significant emotional distress**. It raises serious concern whether the property will ever be allocated in the petitioner's lifetime.
- PWAN continues to **evade responsibility**, showing a pattern of **negligence and disregard** for consumer rights and elderly citizens.

## **APPLICABLE LEGAL BREACHES:**

PWAN's conduct constitutes the following breaches:

- **Breach of Contract** – Total failure to deliver land despite full payment.
- **Fraudulent Misrepresentation** – Promising land under deceptive promotional terms with no fulfillment.
- **Criminal Breach of Trust and Obtaining by False Pretenses** – Violating Sections **312 and 419 of the Nigerian Criminal Code**.
- **Violation of Consumer Rights** – As outlined by the **FCCPA** (Federal Competition and Consumer Protection Act).
- **Exploitation of a vulnerable person** – Considering the petitioner's **age and physical/emotional stress**.

## **RELIEFS SOUGHT:**

We respectfully urge your esteemed office to:

1. **Investigate PWAN Group** for land fraud, deceptive sales, and financial exploitation.
2. **Mandate immediate allocation** of the petitioner's rightful land at **Open Heavens Estate, Eleranigbe**, or another equivalent plot in the same area.
3. In the alternative, **order a full refund of ₦2,835,000**, including interest for 8 years of delay.
4. **Sanction PWAN** to prevent further abuse of elderly citizens and restore consumer confidence.

## **ATTACHED DOCUMENTS:**

- Evidence of Payment (Receipts or Bank Transfers)
- Promotional Offer/Agreement (if available)
- Communication Records with PWAN
- Letter of Transfer or Documentation Application

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*

Payment Method	Reconciling Bank	Land Location	DURATION
OUTRIGHT	DIAMOND BANK	OPEN HEAVENS ESTATE	

Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	600 Sqm	Cost of Transferring One (1) plot of land at OPEN HEAVENS ESTATE from MISS. IHIMEKPEN YETUNDE ROSELYN	135,000.00		135,000.00

Amount in words: One Hundred And Thirty-Five Thousand Naira Only		Total Discount	
		Subtotal	135,000.00
		Sales Tax	
		Total	135,000.00

*(Signature)*



**ZENITH BANK PLC**

BRANCH:

Date:

Title/Name of Account:

Name of Depositor:

Tel/GSM No. of Depositor:

Total Amount in Words:

NOTE: CUSTOMERS ARE INFORMED THAT THE BANK RESERVES THE RIGHT AT ITS DISCRETION TO POSTPONE PAYMENT OF CHEQUES DRAWN AGAINST UNCLEARED EFFECTS WHICH MAY HAVE BEEN CREDITED TO THE ACCOUNT. This deposit is subject to final Verification.

ACCOUNT No.

1 0 1 3 4 2 1 8 7 5

ZB 04

**CUSTOMER'S COPY**

HS PRESS LTD

**DEPOSIT SLIP**

CHEQUE  
BANK

1.	
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11.	
Cheque Count	

For enquiries call 2  
0700ZENITHBANK

List Cheques Separately

# DEED OF TRANSFER

BETWEEN

MISS. IHIMEKPEN YETUNDE ROSELYN  
(TRANSFEROR)

AND



(TRANSFeree)

IN RESPECT OF ALL THAT PIECE AND PARCEL OF LAND KNOWN AS ONE PLOT OF  
LAND, BEING, LYING, SITUATE AT OPEN HEAVENS ESTATE, ELERANIGBE AREA,  
IBEJU-LEKKI LOCAL GOVERNMENT AREA, LAGOS STATE.

Prepared by:

Olukayode A. Akomolafe, Esq.

c/o The Law Firm of Olukayode Akomolafe

2, Olufunmilola Okikiolu Street,

Off Toyin Street,

Ibeju



THIS DEED OF TRANSFER is made this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

BETWEEN

MISS. IHIMEKPEN YETUNDE ROSELYN of 16A, Adebajo Street, Gbagada, Lagos State (Hereinafter called "THE TRANSFEROR") which expression shall where the context so admits include his heirs, administrators, executors, representatives, successors-in -title and persons deriving title under them) of the first part.

AND

\_\_\_\_\_ Block 56, Flat 1, Jakande Estate, Oke-Afa, Lagos State (Hereinafter called "THE TRANSFeree") which expression shall where the context so admits include her heirs, administrators, executors, representatives, successors-in -title and persons deriving title under them) of the other part.

WHEREAS:

1. The said portion known as One (1) plot (600sqm) being out of Three (3) Plots purchased by \_\_\_\_\_ from OPEN HEAVENS ESTATE owned by PWAN HOMES LTD, Real Estate Company is operating in Lekki, Lagos State.
2. The transferor has exclusive and undisturbed possession of the One (1) Plot of Land measuring 600sqm now intended to be transferred.

THE TRANSFEROR HEREBY COVENANT WITH THE TRANSFeree THAT:

- a. The Transferor have not done or knowingly suffered or been party or privy to any act or thing whereby she is prevented from transferring the assigned Demised Property in the manner aforesaid and the transferee and her heirs, personal representatives and assigns shall be entitled to peaceable possession of the interest herein demised without let or hindrances from the Transferor, her heirs, personal representatives, assigns, agents or any person whether lawfully claiming on behalf.

IT IS FUTHER AGREED AS FOLLOWS:

- a. The transferee hereby undertakes to pay all government/ estate levies, taxes, rates and impositions which now and may hereinafter become imposed upon the assigned property, inclusive of land charges that may be imposed from time to time by the Lagos state Government / PWAN HOMES LTD.
- b. The transferee shall pay for her Survey and all development levies.
- c. The transferee undertakes to comply with all existing building and environmental planning laws and requisitions and such other bye-laws as maybe made from time to time by the Local and State Government or the Government of the Federation.

**NOW THIS DEED WITNESSES AS FOLLOWS:**

In consideration of the sum of **₦1, 350,000 (One Million, Three Hundred and Fifty Thousand Naira) only**, the Transferor hereby transfers One (1) plot to the transferee. The Transferor as **BENEFICIAL OWNER** of the property **HEREBY TRANSFERS** unto the transferee all her beneficial interests, legal rights of ownership and title over all that piece and parcel of land measuring **600sqm per plot being One (1) Plot** situate and lying along **OPEN HEAVENS ESTATE, Ibeju-Lekki Local Government Area, Lagos State** and particularly delineated in **Survey Plan No. \_\_\_\_\_** dated \_\_\_\_\_ and bounded by **beacon Nos. \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, and \_\_\_\_\_** attached hereto, to **HOLD and ENJOY** in perpetuity and more particularly their right to the issue of Certificate of Occupancy under the **Land Use Act 1978**.

**IN WITNESS WHEREOF**, the parties have set their hands and seals the day and year first above written:

**SIGNED, SEALED AND DELIVERED** by the within named Transferor.



In the Presence of:

Name: 

Address: 


Occupation: 

Signature: 

**SIGNED, SEALED AND DELIVERED** by the within named Transferee.



In the Presence of:

Name: 

time will be reversed in 48 hours

**Transfer Receipt**

Transfer Type: Internal Transfer ☒ NEFT ☐ NIP ☐ CFTS ☐

Beneficiary Name: **0520163 Pwani Homes LTD**

Amount: N **27,000.00** Originating Branch: **1111111111**

Name of Sender: **[REDACTED]** Transaction Date: **26/01/2017**

**Instant Transfer of Funds to other Banks** Available on Internet Banking and Bank 73

To register for Internet Banking, Simply Call 1777 7777 or visit [www.gpauk.com](http://www.gpauk.com) and click the register button on the internet Banking Tab.

COMPLAINT