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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 HOMES (PWAN GROUP) FOR LAND FRAUD, NON-ALLOCATION, AND BREACH OF CONTRACT – ₦1,500,000 TOTAL MONETARY LOSS

We write to formally petition **PWAN HOMES**, a subsidiary of the **PWAN GROUP**, for engaging in fraudulent and deceptive land sale practices, gross breach of contract, and deliberate failure to fulfill agreed obligations regarding a land transaction in **Flourish Estate, Imedu**.

Despite receiving a total sum of **₦1,500,000** from our client in 2023 for the purchase of land at the said estate, **PWAN HOMES** has **failed, refused, and/or neglected** to allocate the land or issue any valid documentation to date. This conduct constitutes a calculated scheme to defraud unsuspecting buyers and has caused substantial emotional and financial hardship to the complainant.

DETAILED FACTS OF THE CASE

1. In or around **2023**, our client purchased a plot of land from **PWAN HOMES**, located at **Flourish Estate, Imedu**, after being assured of prompt allocation and full documentation.
2. The total amount paid for the property was **₦1,500,000**, transferred via bank to the designated account provided by **PWAN HOMES'** representatives.
3. Since the transaction, **PWAN HOMES has failed to carry out the physical allocation of the land**, nor have they issued any contractual or property documents such as a Contract of Sale, Survey Plan, or Allocation Letter.
4. Numerous follow-up visits, phone calls, and written demands have been made to their offices, all of which have been met with empty promises and excuses.
5. This delay, now exceeding one year, suggests **intentional deception, breach of fiduciary duty**, and possibly a **misappropriation of client funds** under the guise of legitimate real estate investment.

APPLICABLE LEGAL BREACHES

The conduct of PWAN HOMES and its agents constitutes violations of the following laws:

- **Advance Fee Fraud** – Section 419, Criminal Code Act.
- **Criminal Breach of Trust** – Section 312, Criminal Code Act.
- **False and Misleading Advertisement** – Section 14, FCCPA 2019.
- **Breach of Contract** – Failure to allocate land and issue agreed documents after full payment.

RELIEFS SOUGHT

In light of the facts presented, we respectfully request the relevant authorities to:

1. **Launch a formal investigation** into the fraudulent practices of PWAN HOMES and its directors or agents.
2. **Compel immediate allocation** of the client's land at Flourish Estate, Imedu, with supporting documentation (Survey Plan, Deed of Assignment, Allocation Letter, etc.).
3. In the alternative, **order a full refund of ₦1,500,000**, including interest and compensation for breach of trust.
4. **Prosecute all responsible parties** under applicable criminal laws.
5. **Blacklist PWAN HOMES** and freeze further real estate transactions by the company until accountability is enforced.

ATTACHED DOCUMENTS (EVIDENCE)

1. Proof of payment (₦1,500,000) to PWAN HOMES.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



1 of 1



HEAD OFFICE: Floor 1 to 5 PUR Mill 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: +234-12556848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Date:

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Installment	ZENTH BANK	Flourish CITY ESTATE IMEDU	1 Mths

Description	Line Total
Being initial payment for 1.00 Unit(s) of [PD] Plot Demarcation	
Being initial payment for 1.00 Unit(s) of [DOA] Deed of Assignment	N 30,000.00
Being initial payment for 1.00 Unit(s) of [PSV] Provisional survey	N 30,000.00
Amount in words: Thirty Thousand Naira and Zero Kobo Only	
	Subtotal
	Tax
	Total
	N 30,000.00

Additional Information
Total Amount: N 230,000.00
Outstanding Balance: N 200,000.00
Size per Plot: 600 Sqm



HEAD OFFICE: Floor 1 to 5 PUR Mill 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: +234-12556848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Date:

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Outright	057150013 - Zenith Bank Plc	Flourish CITY ESTATE IMEDU	

Description	Line Total
Being full payment for 1.00 Unit(s) of [FCIM] Flourish City Estate Imedu	N 1,500,000.00
Amount in words: One Million, Five Hundred Thousand Naira and Zero Kobo Only	
	Subtotal
	Tax
	Total
	N 1,500,000.00

Additional Information
Total Amount: N 1,500,000.00
Outstanding Balance: N 0.00
Size per Plot: 600 Sqm

FOR PWAN Homes Ltd:
TOMISIN OLANIPEKUN
Signature