



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

PETITION AGAINST PWAN FOR FAILURE TO PROVIDE ALTERNATE ALLOCATION AFTER LAND ISSUE – TOTAL AMOUNT ₦2,700,000

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally lodge a complaint and petition against **PWAN** for **breach of contract, misrepresentation, and failure to reallocate land** following a confirmed issue on previously allocated property.

FACTS OF THE CASE:

- In **2019**, the petitioner purchased **two (2) plots of land (100 by 100)** in **Asaba, Delta State** from **PWAN** for a total of **₦2,500,000**.
- An **initial allocation** was made, but **four years later**, PWAN contacted the petitioner claiming the allocated land had “**problems**” and could no longer be used.
- The petitioner was asked to await **reallocation to a new site**, which **has not been done** till date.
- In addition to the land payment, the petitioner also paid:
 - **₦150,000** for **Survey Plan**
 - **₦50,000** for **Demarcation Fee**
- Total funds paid = **₦2,700,000**
- All attempts to reach PWAN for resolution have failed, with no reallocation, refund, or formal updates provided since the notification.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN constitutes:

- **Breach of contract** – Failure to deliver on the promised land
- **Misrepresentation** – Offering a defective property under false pretenses
- **Violation of the Nigerian Criminal Code (Section 419 & 312)** – Obtaining funds by false pretense and criminal breach of trust
- **Violation of consumer protection laws** – Failure to provide the paid-for service and compensation

RELIEFS SOUGHT:

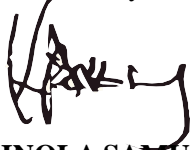
We respectfully request that your esteemed office:

1. **Investigate** PWAN for possible land fraud and breach of trust
2. **Compel immediate reallocation** of valid, dispute-free plots of land in Asaba or a suitable alternative
3. **Alternatively**, mandate the **full refund** of **₦2,700,000**, with accrued interest
4. Take appropriate **regulatory or criminal action** to prevent such repeated consumer exploitation

ATTACHED DOCUMENTS:

- Sales Receipt
- Allocation Letter (initial)

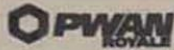
Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ
Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



Contact Address: 36B, Freedom Way, Lekki Phase 1, BY VFS Global.
Opposite Delta Afrique Atlanta, Lagos.
Tel: 08180143335, 08180413335.
Email Address: pwanroyale@gmail.com

Deed of Assignment

Sold to:

Date: October 03, 2019

Receipt #

File #

08143766520

Payment Method		Reconciling Bank	Land Location		DURATION
OUTRIGHT		ZENITH BANK	SACRED HEART ESTATE		OUTRIGHT
Qty	Size #	Description	Amount	Instalment Per plot	Discount
1.00	100ft BY 100ft	Payment for Deed of Assignment for One (1) plot of land at Sacred Heart Estate.	100,000	100,000	
					Line Total
					100,000.00

Amount in words: One Hundred Thousand Naira Only

Total Discount

Subtotal 100,000.00
Sales Tax
Total 100,000.00

Total Amount N 100,000.00
Outstanding Bal: N

FOR PWAN Royale Inv & Dev. Ltd:

ABIOYE ADEOLAPO

PWAN ROYALE INV. & DEV. LTD.
PAID
Sign:
28-10-2019

CONTRACT OF SALE

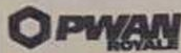
BETWEEN

PWAN ROYALE INVESTMENT & DEVELOPMENT LTD
(THE VENDOR)

AND

(THE PURCHASER)

IN RESPECT OF TWO (2) RESIDENTIAL PLOTS OF LAND AT SACRED HEART ESTATE
SITUATE AT UMUEDI/UMUWUAGWU VILLAGE, IBUSA ASABA, DELTA STATE.



Contact Address: 36B, Freedom Way, Lekki Phase 1, EY VFS Global
Opposite Delta Afrique Atlanta, Lagos.
Tel: 08180143555, 08180415555.
Email Address: pwanroyale@gmail.com

Sales Receipt

Sold to:

Date: September 21, 2019

Receipt #

File #:

05143766520

[illegible]

		Total Discount		Subtotal	200,000.00
Amount in words: Two Hundred Thousand Naira Only				Sales Tax	
				Total	200,000.00
Total Amount: N 2,700,000.00					
Outstanding Bal: N 2,500,000.00					
FOR PWAN Royale Inv & Dev, Ltd:					
ABIOYE ADEDOLAPO					
<div style="border: 2px solid black; padding: 5px; display: inline-block;"> PWAN ROYALE INV. & DEV. LTD PAID </div>					
Sign: Date: 18-10-2019					
				www.pwanroyale.com	

Contact Address: 36B, Freedom Way, Lekki Phase I, BY VFS Global.
 Opposite Delta Afrique Atlanta, Lagos.
 Tel: 08180145555, 08180415555.
 Email Address: pwanroyale@gmail.com

Plot Demarcation

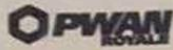
Sold to:

Date: October 03, 2019

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location		DURATION
OUTRIGHT		ZENITH BANK	SACRED HEART ESTATE		OUTRIGHT
Qty	Size #	Description	Amount	Instalment Per plot	Line Total
1.00	100h BY 100h	Payment for Plot Demarcation for One (1) plot of land at Sacred Heart Estate.	50,000	50,000	50,000.00



Contact Address: 368, Freedom Way, Lekki Phase 1, BY VFS Global.
Opposite Delta Afrique Atlanta, Lagos.
Tel: 08180145555, 08180415555.
Email Address: pwanroyale@gmail.com

Survey Fee

Sold to:

[REDACTED]
Sweden
08143766520

Date: October 03, 2019

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location		DURATION	
OUTRIGHT		ZENITH BANK	SACRED HEART ESTATE		OUTRIGHT	
Qty	Size #	Description	Amount	Instalment Per plot	Discount	Line Total
1.00	100h BY 100h	Payment for Survey Fee for One (1) plot of land at Sacred Heart Estate.	150,000	150,000		150,000.00



Contact Address: 368, Freedom Way, Lekki Phase 1, BY VFS Global.
Opposite Delta Afrique Atlanta, Lagos.
Tel: 08180145555, 08180415555.
Email Address: pwanroyale@gmail.com

Sales Receipt

Sold to:

[REDACTED]
08143766520

Date: October 03, 2019

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location		DURATION	
OUTRIGHT		ZENITH BANK	SACRED HEART ESTATE		3 MONTHS	
Qty	Size #	Description	Amount	Instalment Per plot	Discount	Line Total
2.00	100h BY 100h	Final Payment for Two (2) plots of land at Sacred Heart Estate.	2,500,000	1,250,000		2,500,000.00
			Total Discount			
				Subtotal		2,500,000.00
				Sales Tax		