



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 FOR FAILURE TO ALLOCATE LAND

AFTER PAYMENT OF ₦2,000,000.00 (TWO MILLION NAIRA ONLY)

We write on behalf of our client (hereinafter referred to as “**the petitioner**”) to formally petition **PWAN Group**, specifically its subsidiary operating under the **New Land Estate Phase 4, Asaba**, for failure to allocate land despite full payment.

FACTS OF THE CASE:

1. In **February 2024**, the petitioner was convinced by a PWAN staff member to purchase **two plots of land** located at **New Land Estate Phase 4, Asaba**.
2. Following this persuasion, the petitioner made full payment in the total sum of **₦2,000,000.00 (Two Million Naira Only)**.
3. Since the payment, **no allocation** has taken place, and **no documentation or meaningful communication** has been provided by PWAN or its representatives to confirm land ownership or next steps.
4. All efforts by the petitioner to follow up, obtain allocation, or seek clarification have been unsuccessful.
5. The conduct of PWAN in this regard amounts to **a breach of trust, non-performance of contract**, and raises serious concerns of **fraudulent inducement**.

APPLICABLE LEGAL BREACHES:

The actions (or inactions) of PWAN and its agents potentially violate the following laws of the Federal Republic of Nigeria:

1. **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust
2. **Section 419 of the Criminal Code Act** – Obtaining money under false pretences
3. **Consumer Protection Framework (2016)** – Provisions ensuring transparency and accountability from real estate providers

RELIEFS SOUGHT:

Given the monetary loss, emotional distress, and ongoing delay, we respectfully urge your office to:

1. **Investigate PWAN Group** and its staff for breach of contractual obligations and potential real estate fraud.
2. **Compel immediate allocation** of the two plots of land as agreed.
3. Alternatively, **order a full refund of ₦2,000,000.00** with appropriate interest.
4. Enforce regulatory sanctions and make PWAN publicly accountable to deter further victimization of unsuspecting buyers.

ATTACHED DOCUMENTS:

- Proof of payment (₦2,000,000.00)

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

DATE: 28TH, AUGUST, 2024

Ref: [REDACTED]

Dear Valued Client,

PHYSICAL ALLOCATION LETTER

You are hereby notified of your allocation as follows:

NEWLAND ESTATE, PHASE 4 BY AKU ABATA ASABA, DELTA STATE

Estate Name: _____

No of Plot(s): TWO (2) PLOTS (RESIDENTIAL)

464 SQM EACH

Plot Size (SQM): _____

BLOCK P, PLOT 8 & 9

Plot(s) Details: _____

Date of Allocation: 15, OCTOBER 2024

Note: This letter confirms your allocation pending the receipt of your survey plan and deed of assignment.

Thank you for confiding in us.

Yours faithfully,

AUTHORIZED SIGNATORY
ENYALI THEOPHILUS CHUX
Managing Director/CEO

CONTRACT OF SALE

BETWEEN

PWAN REGAL PROPERTIES LTD

RC: 1882525

(THE VENDOR)

AND

[REDACTED]
(THE PURCHASER)

IN RESPECT OF TWO (2) PLOTS OF LAND IN NEWLAND ESTATE PHASE 4 BY AKU ABATA ASABA, SITUATE AT OGBE UTEH, ATUMA IGA, OSHIMILI NORTH LOCAL GOVERNMENT AREA, DELTA STATE.

PREPARED BY:

CHIEF C.O OLOWU, ESQ.
3WAYS JUSTICE SOLICITORS
(OGARANYA CHAMBERS)
KM 25, LEKKI-EPE
EXPRESSWAY, BESIDE
AJAH POLICE STATION,
AJAH, LAGOS.

THIS AGREEMENT is made this 17th day of February, 2024

BETWEEN

PWAN REGAL PROPERTIES LTD a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its office at **5th Floor, Right Wing, Providence Plaza, Plots 17 and 18 Opp. Greenland Estate, Lekki/Epe Expressway, Oko Ado, Sangotedo, Lekki, Lagos State, Nigeria** (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.
The Vendor has acquired a vast tract of land designated into plot sizes of 464sqm and 928sqm **SITUATED AT OGBE UTEH, ATUMA IGA, OSHIMILI NORTH LOCAL GOVERNMENT AREA, DELTA STATE** Described as **NEWLAND ESTATE ASABA PHASE 4 ASABA BY AKU ABATA**
2. The Vendor with intent to achieve its object of development of Schemes has procure **THE NEWLAND ESTATE ASABA PHASE 3** 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) unit of 464 square meters plot of land and the Vendor shall allocate same within the Scheme to the Purchaser under the following terms and conditions:

1. The Purchaser has paid the purchase sum of **N1,500,000.00 (One Million and Five Hundred thousand naira)** only Two (2) plots of 464 square meters Plot of land at **NEWLAND ESTATE ASABA PHASE 4 ASABA BY AKU ABATA**, the receipt of which the Vendor hereby acknowledges.
2. The Purchaser shall bear the cost of the preparation of a Survey Plan in his name which shall be **IMASIEN PAUL FFOSA**.



Office: 5th Floor providence plaza,
17&18 Lekki/Epe Exp. Way
Sangotedo, Lekki, Lagos State.
Tel: +2348186666555, +2348143521261
Email: pwanregal@gmail.com
website: www.pwanregal.com

Sales Receipt

Sold To: **[REDACTED]** Date: 19-Feb-24
Receipt #: **[REDACTED]**
File #: **[REDACTED]**
Comment: paulmasuno13@gmail.com

Payment Method	Reconciling Bank	Scheme	Duration
OUTRIGHT	5801115958- Fidelity Bank Plc	NEWLAND ESTATE ASABA	
Description			Line Total
BEING OUTRIGHT PAYMENT FOR DOCUMENTATION OF OF 2 PLOT(S) OF 464SQM OF NEW LAND PHASE 4 BY AKU ABATA 'OSHIMILI' NORTH, DELTA STATE, NIGERIA.			N 500,000.00
Amount in words: FIVE HUNDRED THOUSAND NAIRA ONLY			N 500,000.00
			N -
			N 500,000.00

Additional Information

Total Amount: N 500,000.00
Outstanding Balance:
Plot Size: 464 Sqm

FOR PWAN REGAL PROPERTIES LTD

AIYEDINA DAVID OLUWASEYI

Signature

DEED OF ASSIGNMENT

BETWEEN

PWAN REGAL PROPERTIES LIMITED

**RC: 1882525
(ASSIGNOR)**

AND

**[REDACTED]
(ASSIGNEE)**

IN RESPECT OF ALL THAT PARCEL OF LAND KNOWN AS BLOCK
NEWLAND ESTATE PHASE 4 ASABA, LYING AND SITUATE AT UMU IWEZUE FAMILY
LAND, IN OGBE UTEH QUARTER IN ATUMA-IGA OSHIMILI NORTH LOCAL
GOVERNMENT AREA, DELTA STATE

PREPARED BY:

CHIEF C.O OLOWU, ESQ.
3WAYS JUSTICE SOLICITORS
(OGARANYA CHAMBERS)
KM 25, LEKKI-EPE EXPRESSWAY,
BESIDE AJAH POLICE STATION,
AJAH LAGOS

THIS DEED OF ASSIGNMENT is made this 4th day of March, 2024

BETWEEN:

PWAN REGAL PROPERTIES LTD a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its office at 5th Floor, Right wing, Providence Plaza, Plots 17 and 18, Olokonla Bus-stop, Lekki/Epe Expressway, Olo Ado, Sangotedo, Lekki, Lagos State (hereinafter referred to as 'THE ASSIGNOR' which expression shall wherever the context so admits mean and include its Assigns, Authorized Legal Representatives and Successors-in-Title) of the one part.

AND

[REDACTED] (hereinafter referred to as 'THE ASSIGNEE' which expression shall wherever the context so admits mean and include his Heirs, Executors, Administrators, Assigns and Legal Representatives) of the other part.

WHEREAS:

1. All that piece and parcel of land lying and situate, the UMU IWEZUE FAMILY LAND, IN OGBE UTEH QUARTER IN ATUMA-IGA OSHIMILI NORTH LOCAL GOVERNMENT AREA OF DELTA STATE became seized of a vast extension of land lying, being and situate at Ogbe-Uteh Quarters, Atuma-Iga in Oshimili North Local Government Area, Delta State by long settlement and acquisition under Native and Customary laws. Measuring approximately Fifty (50) Acres of Land of 100 by 100ft per plots. (Hereinafter referred to as "The Property") forms part of a large expanse of land delineated, defrosted and acquired by UMU

You sent

₦1,800,000

Recipient:

Pwan Regal Properties Ltd

Recipient bank:

Fidelity

Account no:

5601115958



Description:

**Newland Estate by Aku-Abata [REDACTED]
[REDACTED] to PWAN REGAL PROPERTIES
LTD**



Sent ₦1,800,000 to Fidelity - 5601115958

Date:

2024-02-17 10:46:30

Transaction type:

disburse

Transaction status:

Successful



Office: 5th Floor providence plaza,
17&18 Iekki/Epe Exp. Way
Sangotedo, Lekki, Lagos State
Tel: +234818666555, +2348143521261
Email: pwanregal@gmail.com
website: www.pwanregal.com

Sales Receipt

Sold To:

[REDACTED]

Date: 17-Feb-23

Receipt #:

File #:

Comment: [REDACTED]@gmail.com

Payment Method	Reconciling Bank	Scheme	Duration
OUTRIGHT	5601115958- Fidelity Bank Plc	NEWLAND ESTATE ASABA.	

Description	Line Total
BEING OUTRIGHT PAYMENT FOR OF 2 PLOT(S) OF 464SQM OF NEW LAND ESTATE PHASE 4 BY AKU ABATA OSHIMILI NORTH, DELTA STATE, NIGERIA.	N 1,500,000.00
Amount in words: ONE MILLION, FIVE HUNDRED THOUSAND NAIRA	N 1,500,000.00
	N -
	N 1,500,000.00

Additional Information

Total Amount: N 1,500,000.00

Outstanding Balance:

Plot Size: 464 Sqm

FOR PWAN REGAL PROPERTIES LTD

AIYEDINA DAVID OLUWASEYI

Signature



Transaction Receipt

You sent

#200,000

Recipient:

Pwan Regal Properties Ltd

Recipient bank:

Fidelity

Account no:

5601115958



Description:

**Pwan real estate purchase / [REDACTED]
[REDACTED] to PWAN REGAL PROPERTIES
LTD**



Sent #200,000 to Fidelity - 5601115958

Date:

2024-02-29 12:40:21

Transaction type:

disburse