



☎ 07077513836

✉ 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 (ATLANTIC BAY ESTATE, PRIME GARDENS II, AND HECTARES OF DIAMOND) FOR FRAUD, NON-ALLOCATION, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦23,710,000

We are solicitors to the Petitioner, hereinafter referred to as “*our client*,” and on their behalf, we respectfully submit this formal criminal complaint against **PWAN Homes**, in connection with its subsidiaries and officers responsible for the management and sale of the following estates:

Atlantic Bay Estate, Prime Gardens II, and Hectares of Diamond, all situated within Ibeju-Lekki and other locations in Lagos State.

FACTUAL SUMMARY

1. Between [insert purchase years if available — e.g., 2017–2024], our client purchased multiple plots of land across three (3) estates from PWAN Homes, namely:
 - **Atlantic Bay Estate** for ₦4,050,000.00 plus ₦770,000.00 for documentation and related fees.

- **Prime Gardens II** for ₦1,000,000.00 plus ₦1,950,000.00 for documentation and related fees.
 - **Hectares of Diamond** for ₦15,300,000.00 plus ₦640,000.00 for documentation and related fees.
2. The **total amount paid** by our client is **₦23,710,000.00** (Twenty-Three Million, Seven Hundred and Ten Thousand Naira), covering purchase price, survey fees, deeds of assignment, corner piece demarcations, and other required administrative charges.
 3. Despite full payment and repeated requests, PWAN Homes has **failed to allocate the purchased plots**, issue valid allocation documents, or provide any reasonable explanation for the prolonged delay.
 4. Several follow-up visits, calls, and written communications have been met with excuses, false promises of allocation, or total silence from company representatives.
 5. This conduct has caused our client grave financial loss, emotional distress, and deprived them of their legitimate right to use and develop the properties purchased.

CRIMINAL OFFENCES DISCLOSED

The actions of PWAN Homes and its responsible officers reveal multiple violations of Nigerian criminal and consumer protection laws, including but not limited to:

- **Advance Fee Fraud and Obtaining by False Pretence** – contrary to Section 1(1)(a) & (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006;
- **Criminal Breach of Trust** – contrary to Section 312 of the Criminal Code Act;
- **Conspiracy to Defraud** – contrary to Section 516 of the Criminal Code Act;
- **Unfair Business Practices and Misrepresentation** – contrary to Section 14 of the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- **Cheating** – contrary to Section 421 of the Penal Code (where applicable).

PRAYERS

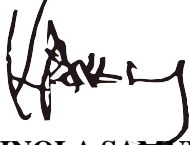
In light of the foregoing, we respectfully seek the following reliefs:

1. That your office urgently initiates a thorough criminal investigation into PWAN Homes and the officers responsible for these estates.
2. That criminal prosecution be commenced against any individuals found culpable for fraud, misrepresentation, or breach of trust.
3. That PWAN Homes be compelled to either:
 - Allocate all the plots across **Atlantic Bay Estate, Prime Gardens II, and Hectares of Diamond** as fully paid for; **or**
 - Refund the entire sum of **₦23,710,000.00** to our client with applicable interest and compensation.
4. That PWAN Homes be ordered to compensate our client for the financial hardship, emotional distress, and lost opportunities suffered due to this prolonged non-allocation.
5. That all regulatory and enforcement agencies place strict compliance and monitoring measures on PWAN Homes' future land sales until all pending obligations to affected customers are fully resolved.

Our client is ready to provide supporting documents, including receipts, contracts, and correspondence, to assist in your investigation and any prosecution that may follow.

Thank you for your prompt attention to this urgent matter.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

PWAN HOMES
...making homes a reality for everyone in Nigeria

HEAD OFFICE: Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo/Ada, Ajah, Lagos
IKEJA OFFICE: 16A Sule Aburke Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12968848, +234-14533668
Email: info@pwanhomes.com

Sales Receipt

Sold To: [REDACTED]

Date: [REDACTED]
Receipt #: [REDACTED]
File #: [REDACTED]
Comment: [REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Outright	011152303 - First Bank of Nigeria Plc	Hectares of Diamond 2	1 Mths

Description	Line Total
Being final payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 15,300,000.00
Amount in words: Six Million, Three Hundred Thousand Naira and Zero Kobo Only	
	Subtotal N 6,300,000.00
	Tax N 0.00
	Total N 6,300,000.00

Additional Information

Total Amount: N 15,300,000.00
Outstanding Balance: N 0.00
Plot Size: 600 Sqm
Discount: 10.0%

FOR PWAN Homes Ltd:
DADA ANUOLUWAPO



HEAD OFFICE: Floor 1 to 5 RUI-Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo-Ado, Ajah, Lagos.
REGIONAL OFFICE: 16A, Sule Azuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12566948, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[REDACTED]

Date:

Receipt #

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Outright	063150162 - Diamond Bank Plc	Hectares of Diamond 2	1 Mths

Description	Line Total	
Being full payment for 2 Unit(s) of [PSV] Provisional survey	N 100,000.00	
Being full payment for 2 Unit(s) of [DOA] Deed of Assignment	N 400,000.00	
Being full payment for 2 Unit(s) of [PD] Plot Demarcation	N 140,000.00	
Amount in words: Six Hundred Forty Thousand Naira and Zero Kobo Only	Subtotal	N 640,000.00
	Tax	N 0.00
	Total	N 640,000.00

Additional Information

Total Amount: N 640,000.00
Outstanding Balance: N 0.00
Plot Size: 600 Sqm

FOR PWAN Homes Ltd:

Funke David

Signature





HEAD OFFICE: Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Abo, Ajin, Lagos
REGIONAL OFFICE: 16A Sule Azuka Close, Off Opebi Road by CTR, Opebi, Ikeja, Lagos
Tel: +234-12650048, +234-14533000
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Date:
Receipt #:
File #:
Comment:

Payment Method	Reconciling Bank	Estate	Duration
Outright	GTBank	Atlantic Bay Estate	

Description	Line Total	
Being full payment for 1.00 Unit(s) of [DOA] Deed of Assignment	N 200,000.00	
Being full payment for 1.00 Unit(s) of [SV] Survey	N 500,000.00	
Being full payment for 1.00 Unit(s) of [PD] Plot Demarcation	N 70,000.00	
Amount in words: Seven Hundred Seventy Thousand Naira and Zero Kobo Only	Subtotal	N 770,000.00
	Tax	N 0.00
	Total	N 770,000.00

Additional Information

Total Amount: N 770,000.00
Outstanding Balance: N 0.00
Size per Plot: 600 Sqm

FOR PWAN Homes Ltd:

OLUOMA NZENWUGO

Signature





HEAD OFFICE: Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo, Lagos
REGIONAL OFFICE: 15A, Sule Abaka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12968848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[REDACTED]

Date:
Receipt #:
File #:
Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	Duration
Instalment	011152303 - First Bank of Nigeria Plc	Atlantic Bay Estate	3Mths

Description	Line Total	
Being final payment for 1.00 Plot(s) of [ABE] Land at Atlantic Bay Estate	N 702,346.45	
Amount in words: Seven Hundred Two Thousand, Three Hundred Forty-Six Naira and Forty-Five Kobo Only	Subtotal	N 702,346.45
	Tax	N 0.00
	Total	N 702,346.45

Additional Information

Total Amount: N 4,050,000.00
Outstanding Balance: N 0.00
Size per Plot: 600 sqm
Discount: 10.0%

FOR PWAN Homes Ltd:

Anthonia Abayomi-Ogunlade

Signature





HEAD OFFICE: Room 1 to 5 PURI Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo/Ado, Ajah, Lagos
IKEJA OFFICE: 16A Sule Azubui Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12356848, +234-14533668
Email: info@pwanhomes.com

Sales Receipt

Sold To:



Date:

Receipt #:

File #:

Comment:



Payment Method	Reconciling Bank	Estate	DURATION
Outright	011152303 - First Bank of Nigeria Plc	Hectares of Diamond 2	1 Mths

Description	Line Total	
Being final payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 15,300,000.00	
Amount in words: Six Million, Three Hundred Thousand Naira and Zero Kobo Only	Subtotal	N 6,300,000.00
	Tax	N 0.00
	Total	N 6,300,000.00

Additional Information

Total Amount: N 15,300,000.00
Outstanding Balance: N 0.00
Plot Size: 600 Sqm
Discount: 10.0%

FOR PWAN Homes Ltd:

DADA ANUOLUWAPO

Signature