ELUYEFA CHAMBERS



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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 (PWAN HOMES) FOR FAILURE TO ALLOCATE LAND AFTER PAYMENT SINCE 2016

We write on behalf of our client (hereinafter referred to as "the alleged petitioner") to formally petition PWAN Group, specifically **PWAN HOMES**, for actions amounting to **fraud**, **breach of contract**, and **financial misconduct** concerning the purchase of land at *Tehila Gardens*, *Ibeju-Lekki*, *Lagos*, which has remained **unallocated for nearly a decade**.

FACTS OF THE CASE:

In 2016, the petitioner—then residing in the diaspora—was drawn to a promotional offer by **PWAN HOMES** advertising *Tehila Gardens* estate, purportedly near the Dangote Refinery in Ibeju-Lekki, Lagos State. The promotion included a "**Buy 2 plots, get 1 free**" deal.

Motivated by the desire to invest in Nigeria and in good faith, the petitioner made full payment totaling N3,000,000 (Three Million Naira) for two plots of land at N1,500,000 each, as advertised.

Despite assurances and promotional materials suggesting immediate or timely allocation, **no physical allocation** or possession of land has been granted to date.

Instead, the petitioner has endured **years of conflicting narratives**, **silence**, **and evasive responses** from PWAN staff, reflecting a deliberate attempt to avoid accountability.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN HOMES potentially violates the following:

- **Section 419 of the Criminal Code Act** *Obtaining money or property under false pretences.*
- Section 312 of the Criminal Code Act, Cap C38, LFN 2004 Criminal breach of trust.
- **Federal Competition and Consumer Protection Act** (**FCCPA**) *Violation of consumer rights relating to fair dealing, honest advertising, and fulfillment of paid services.*

RELIEFS SOUGHT:

We humbly request that your esteemed office:

- 1. **Launch a formal investigation** into PWAN HOMES for fraudulent land schemes and willful non-allocation despite payment.
- 2. **Prosecute responsible officers** and corporate representatives for breach of trust, contract, and financial deception.
- 3. **Compel PWAN HOMES** to either:
 - o Allocate the land originally purchased, or
 - Issue a **full monetary refund with applicable interest** for lost time and investment potential.
- 4. Enforce regulatory measures to **prevent further exploitation** of unsuspecting Nigerians, both home and abroad.

ATTACHED DOCUMENTS:

- Proof of payment (\aleph 3,000,000)
- Promotional materials referencing Tehila Gardens and the "Buy 2 Get 1 Free" offer
- Any relevant correspondences and follow-ups sent to PWAN HOMES

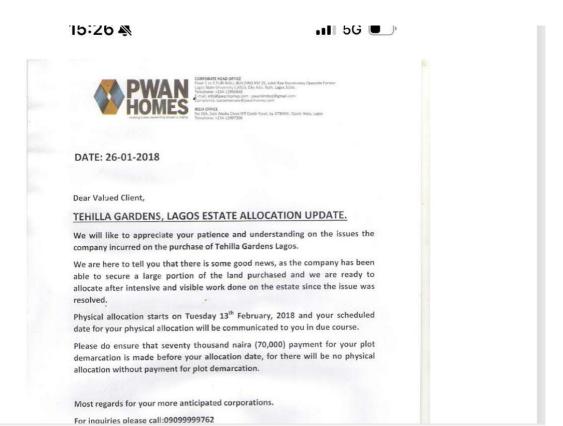
Yours faithfully,

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

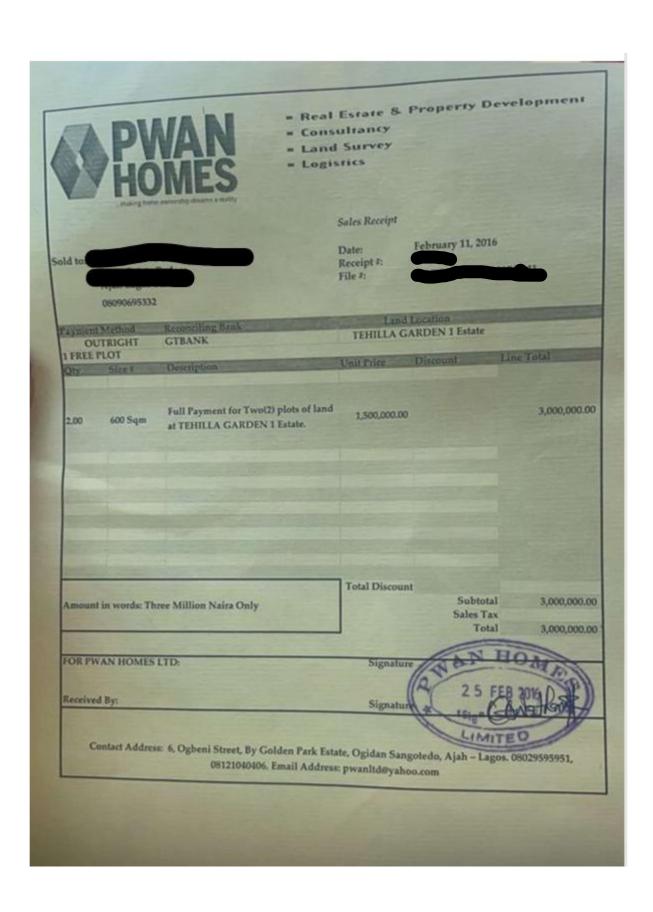




- * Real Estate & Property Development
- · Consultancy
- * Land Survey
- · Logistics

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Itle: M155	
Surname:	
Other Names	
Marital Status: 51091	
Name of Spouse:	N-A STEERS
Tel. No:	E-mail:
Postal Address	2.2
Residential Address	
Occupation: KEFIX	TOR
Employer's Name/Address:.	N - A
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Type of Plots:	Residential Commercial
Number of Plots: 🔍	
Payment Options: Fu	II 18 Months
Johnson Idera harabu	affirm that all information provided as a requirement for
allocation of land in Tehilla	Gardens Phase 1 at Free Trade Zone Area in Ibeju-Lekki Lo
	tate is true and any false or inaccurate information given by
may result in the decline of	my application.
Signature:	Date: 10
Signature.	
	ato: 10/Feb/ 2016
Referred by:	
DESCRIPTION OF STREET	
Referred by: Referrer Phone No Action by:	Date:

Contact Address: No 6 Ogbeni Street, Thera Annex, beside Conoil Filling Station by Golden Park Estate, Ogidan, Sangotedo, Lekki Peninsula – Lagos. 08029595951. Email Address: pwanitd@yahoo.com



TEHILLA GARDEN SURVEY

