



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 FOR FRAUDULENT LAND SALE AND NON-ALLOCATION –
₦930,000 TOTAL LOSS**

We write to formally petition **PWAN HOMES**, a subsidiary of PWAN GROUP, for engaging in deceptive land sale practices and breach of trust. Despite full payment for a residential plot and associated documentation at Flourish City Ode-Omi Estate Phase 2, **no land has been allocated** and no documentation delivered to our client to date.

FACTS OF THE CASE

- In 2022, our client purchased **one (1) plot of land measuring 600 square meters** located at **Flourish City Ode-Omi Estate Phase 2, Ibeju-Lekki Local Government Area, Lagos State**, from **PWAN HOMES**.
- The **total agreed payment** was **₦930,000.00**, broken down as follows:
 - **₦750,000** for the land
 - **₦180,000** for **Deed of Assignment, Provisional Survey, and Plot Demarcation**
- The full payment was completed within three (3) months, in good faith, via staggered installments.
- Despite completing the payment, our client has **not received any allocation letter, survey plan, deed of assignment, or site demarcation**.
- Several follow-up efforts and visits to the PWAN HOMES office have yielded **no concrete response, no**

progress, and **no refund**, raising serious concerns about fraudulent intent and systemic abuse of trust.

APPLICABLE LEGAL BREACHES

The actions of PWAN HOMES and its representatives amount to:

- **Advance Fee Fraud** – Section 419, Nigerian Criminal Code
- **Criminal Breach of Trust** – Section 312
- **False Pretenses and Intent to Defraud**
- **Misrepresentation and Deceptive Conduct** – Section 14, FCCPA (2019)
- **Breach of Contract** – Failure to allocate land or provide agreed documents after full payment

RELIEFS SOUGHT


We respectfully request the intervention of the appropriate regulatory and law enforcement agencies to:

1. **Investigate PWAN HOMES** and its officers involved in this land scheme at Flourish City Ode-Omi Phase 2.
2. **Compel immediate allocation** of the 600sqm plot along with full supporting documents (Survey Plan, Deed of Assignment, Allocation Letter).
3. Alternatively, **order a full refund** of **₦930,000.00** with **statutory interest and penalties**.
4. **Initiate prosecution** where applicable, and **sanction the company** for consumer fraud and abuse of public trust.

ATTACHED DOCUMENTS

- **Receipts of payments made** for land and documentation

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD
(THE VENDOR)

AND

MISS. [REDACTED]
(THE PURCHASER)

IN RESPECT OF ONE (1) RESIDENTIAL PLOT OF LAND AT FLOURISH CITY ESTATE
ODE OMI PHASE 2 SITUATE AT ODE – OMI AREA IN IBEJU LEKKI LOCAL
GOVERNMENT AREA, LAGOS STATE



HEAD OFFICE: Box 115 FUN Mile Estate, 94/25, Lekki Ex-Expressway, Ojo, Lagos State University
(L.A.S.U.) On: Aso, Aso, Lagos
REGIONAL OFFICE: 15A, 34th Avenue, Oshodi, Lagos State
Tel: +234-2006645-224-1453300
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[Redacted]
08184235634

Date:

Receipt #:

File #:

Comment:

Aug 05, 2022
[Redacted]

Payment Method	Reconciling Bank	Estate	Duration
Outright	057150013 - Zenith Bank Plc	Flourish City Estate Odeom 2	

Description	Line Total
Being full payment for 1.00 Unit(s) of [DOA] Deed of Assignment	N 100,000.00
Being full payment for 1.00 Unit(s) of [PSV] Provisional survey	N 50,000.00
Being full payment for 1.00 Unit(s) of [PD] Plot Demarcation	N 30,000.00
Amount in words: One Hundred Eighty Thousand Naira and Zero Kobo Only	
	Subtotal N 180,000.00
	Tax N 0.00
	Total N 180,000.00

Additional Information

Total Amount: N 180,000.00
Outstanding Balance: N 0.00
Size per Plot: 600 Sqm

FOR PWAN Homes Ltd:

OLUOMA NZENWUGO

Signature



Sales Receipt

1

2200

File #

Case # _____

Comments _____

001164235034

Payment Method	Reconciling Bank	Estate	Duration
Installment	ZENITH BANK	Pleasant City Estate, Oduduwo 2	Indefinite

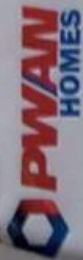
Description	Line Total
Billing first payment for 1.00 Photo(s) of [FCGO 2] Fourth Cay Estate Owners 2	M 280.000.00
Amount in words: Two Hundred Eighty Thousand Naira and Zero Kobo Only	<div>Subtotal</div> <div>Tax</div> <div>Total</div>
<div>Total Amount: M 750.000.00</div> <div>Outstanding Balance: M 0.00</div> <div>Size per Plot: 650 sqm.</div>	M 280.000.00 M 0.00 M 280.000.00

FOR PWWH Homes Ltd.

CARTUCCIOLA

Signatures





HEAD OFFICE: Plot 1 to 5, P/101 Road Building, P/101, Lower 8th Floor, Oshodi, Lagos State University
Lagos, Oyo State, Abuja, Lagos
REGAL OFFICE: 10A Sun Road, Oshodi, Oshodi, Lagos State, Oshodi, Lagos State, Lagos
Tel: +234-1-2559988 - 234-1-602888
Email: info@pwanhomes.com

Sales Receipt

Sold To:

Mr.

813

Date:

Mar 22, 2025

Receipt #:

[REDACTED]

File #:

[REDACTED]

Comment:

[REDACTED]

08184235634

Payment Method	Reconciling Bank	Estate	Duration
Installment	087150013 - Zenith Bank Plc	Flourish City Estate Odcom 2	3mths

Description	Line Total
Being installment payment for 1.00 Plot(s) of [FCOD 2] Flourish City Estate Odcom 2.	N 70,000.00
Amount in words: Seventy Thousand Naira and Zero Kobo Only	Subtotal N 70,000.00 Tax N 0.00 Total N 70,000.00

Additional Information

Total Amount: N 750,000.00
Outstanding Balance: N 280,000.00
Size per Plot: 500 sqm

FOR PWAN Homes Ltd:

SHITTU FIOLA

Signature





HEAD OFFICE: Plot 1 to 5, N1 Road Building, W4/26, Ladoke Akintola Expressway, Lagos State University
(LASE), Ojo Area, Lagos.
REGIONAL OFFICE: 106, Sani Abacha Close, Off Oshodi Road, (Off Oshodi Road), Lagos State.
Tel: +234-1-2560000, +234-14633000
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[Redacted]

08184235634

Date:

Mar 21, 2022

Receipt #:

[Redacted]

File #:

[Redacted]

Comment:

[Redacted]

Payment Method	Reconciling Bank	Estate	Duration
Installment	057150013 - Zenith Bank Plc	Flourish City Estate Odions 2	3mths

Description	Line Total
Being installment payment for 1.00 Plot(s) of [FGOD 2] Flourish City Estate Odions 2	N 100,000.00
Amount in words: One Hundred Thousand Naira and Zero Kobo Only	Subtotal N 100,000.00 Tax N 0.00 Total N 100,000.00
Additional Information	
Total Amount: N 750,000.00 Outstanding Balance: N 350,000.00 Size per Plot: 600 sqm	

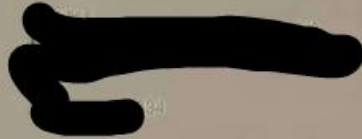
FOR PWAN Homes Ltd:
SHITU FIOLA
Signature



HEAD OFFICE: Floor 1 to 5 Puri Mill Building, KM25, Lekki Expressway, Opposite Lagos State University (LASU), Ojo-Ado, Ajah, Lagos
REGIONAL OFFICE: 16A Sule Abacha Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12568848, +234-14533609
Email: info@pwanhomes.com

Sales Receipt

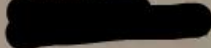
Sold To:



Date:

Feb 09, 2022

Receipt #:



File #:

Comments:

Payment Method	Reconciling Bank	Estate	Duration
Installment	057150013 - Zenith Bank Plc	Flourish City Estate Ode Omi 2	3mths

Description	Line Total
Being initial payment for 1.00 Plot(s) of [FCOD 2] Flourish City Estate Odeomi 2	N 300,000.00
in words: Three Hundred Thousand Naira and Zero Kobo Only	
	Subtotal N 300,000.00
	Tax N 0.00
	Total N 300,000.00

Additional Information

Total Amount: N 750,000.00
Outstanding Balance: N 450,000.00
Size per Plot: 600 sqm

FOR PWAN Homes Ltd:
Nweke Gideon
Signature: