



**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](mailto: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](mailto:info@pwangroup.com), [pwanpronigeria@gmail.com](mailto:pwanpronigeria@gmail.com)

**PETITION AGAINST PWAN HOMES LTD FOR FAILURE TO DELIVER LAND  
ALLOCATION AT LEKKI VILLA PHASE 2 ESTATE – TOTAL AMOUNT ₦3,000,000**

We bring to your attention a formal complaint against PWAN Homes Ltd regarding the non-allocation of land after full payment was made by the buyer.

**FACTS OF THE CASE:**

- On **June 30, 2016**, full payment of **₦3,000,000** was made to PWAN Homes Ltd for **two (2) plots of land at Lekki Villas 2 Estate**, located in **Ibeju Town, Ibeju-Lekki Local Government Area of Lagos State**.
- PWAN Homes Ltd acknowledged the payment and confirmed that each plot measured **648 sqm**.
- The buyer was instructed to pay additional charges for a **Provisional Survey Plan, Plot Demarcation**, and a **Deed of Assignment**, which were either paid or accepted as pending per instructions.
- Since 2016, despite repeated visits to PWAN offices and assurances from their staff, **no physical allocation of land has been done**.
- This issue has persisted for over **8 years**, with no refund, land access, or concrete resolution.
- The delay has caused significant emotional distress and financial hardship, especially given the buyer's advancing age.

## ALLEGED OFFENSES:

The actions of PWAN Homes Ltd amount to:

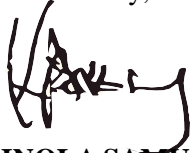
- **Breach of Contract:** Payment was made in full with no delivery.
- **Misrepresentation:** Land was marketed and sold with false or unfulfilled assurances.
- **Fraudulent Conduct:** The prolonged withholding of land or refund points to deliberate deceit.
- **Consumer Exploitation:** The buyer's rights have been violated.

## RELIEFS SOUGHT:

We respectfully request:

1. A full **investigation into the conduct of PWAN Homes Ltd** regarding this transaction.
2. **Immediate allocation** of the two plots of land paid for at Lekki Villa Phase 2 Estate.
3. In the alternative, a **full refund of ₦3,000,000**, plus accrued interest and compensation for damages.
4. Appropriate sanctions against PWAN Homes Ltd to **prevent further exploitation** of land buyers.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*





**HEAD OFFICE:** No 6 Ogbeni Street, THERA ANNEX, off Lekki-Expressway-Epe,  
by Conoil Filling Station, beside Golden Park Estate, Ogidan, Ajah, Lekki, Lagos.  
Tel: +234 1 2956848  
**IKEJA OFFICE:** 16A Sule Abuka Close off Opebi Road by GTB, Opebi, Ikeja, Lagos.  
Tel: +234 1 2957206, Emails: pwanltd@yahoo.com, info@pwanhomes.com.

17th August, 2016



Dear Sir/Ma,

**ALLOCATION NOTIFICATION LETTER FOR TWO PLOTS OF LAND AT LEKKI VILLA 2 ESTATE, IBEJU TOWN, IBEJU-LEKKI L.G.A**

We write to notify you that Two (2) plots of land shall be allocated to you at Lekki Villa 2 Estate, located at Ibeju Town, IbejuLekki Local Government Area of Lagos State.

Please find below the description of the allocation:

**LOCATION:** Ibeju Town, IbejuLekki Area of Lagos State.

**SIZE:** Two (2) plots of Undeveloped land measuring 648sqm each.

**TITLE:** Undeveloped parcel of Land with gazette.

You are required to make the following payments before your allocation:

1. **Provisional Survey Plan Fee:** To pay the sum of ₦50,000 only per plot, being the payment for your Provisional Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of ₦20,000 only per plot for your plot demarcation (4 Corner Piece).
3. **Deed of Assignment Fee:** We would kindly advice you on the cost for the production of your Deed of Assignment at a later date.

Payment shall be made into any **Diamond Bank** branch. Account Name: **Folkland Property Development Company**, Account Number: **0035628388**.

Your provisional Survey Copies containing full details of your plot shall be made available to you after your physical

# CONTRACT OF SALE

BETWEEN


**PWAN HOMES LTD**  
(THE VENDOR)

AND

**[REDACTED]**  
(THE PURCHASERS)

IN RESPECT OF TWO (2) PLOTS OF LAND AT LEKKI VILLA PHASE 2 SITUATE AT  
IBEJU TOWN IN IBEJU-LEKKI LOCAL GOVERNMENT AREA, LAGOS STATE

PREPARED BY:



EMMANUEL NDUBUISI, ESQ.  
C/O THE LAW FIRM OF OLUKAYODE A. AKOMOLAFE  
2, OLUFUNMILOLA OKIKIOLU STREET,  
OFF TOYIN STREET,

# DEED OF ASSIGNMENT

BETWEEN

PWAN HOMES LTD  
(ASSIGNOR)

AND

[REDACTED]

IN RESPECT OF ALL THAT PARCEL OF LAND KNOWN AS BLOCK I PLOTS 5 AND 6 AT LEKKI VILLA  
PHASE 2 SITUATE AT ARAROMI AREA, IBEJU TOWN IN IBEJU-LEKKI LOCAL GOVERNMENT  
AREA, LAGOS STATE.

PREPARED BY:

EMMANUEL NDUBUISI, ESQ.

C/O THE LAW FIRM OF OLUKAYODE A. AKOMOLAFE

2, OLUFUNMILOLA OKIKIOLU STREET,

IKEJA,

LAGOS.