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✉ [eluyefachambers@gmail.com](mailto: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](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 (PWAN GROUP) FOR LAND ALLOCATION FRAUD, NON-COMMUNICATION, AND BREACH OF CONTRACT – ₦1,500,000 TOTAL MONETARY LOSS**

We write to formally petition **PWAN HOMES**, a subsidiary of the **PWAN GROUP**, for fraudulent misrepresentation, non-allocation of land, and breach of contractual obligations concerning our client's real estate investment at **Ilosiwaju Estate**.

Despite receiving a total of **₦1,500,000** from our client in **2024** for the purchase of land, PWAN HOMES has failed to communicate, allocate the plot, or issue any relevant documents. Their conduct demonstrates willful deceit, administrative negligence, and abuse of trust.

**DETAILED FACTS OF THE CASE**

1. In **2024**, our client paid a total of **₦1,500,000** to PWAN HOMES for the purchase of a plot of land at **Ilosiwaju Estate**.
2. Without notifying our client or providing any formal documentation, PWAN HOMES proceeded to carry out an allocation exercise at Ilosiwaju Estate in the client's absence.
3. Our client only discovered the development upon visiting the company's office, where he was told that **allocations are done in batches** and that **no specific date could be given** for when his own plot would be allocated.
4. Since **October 2024**, our client has sent multiple emails seeking clarification and a timeline for allocation—**none of which have been acknowledged or responded to**.
5. This behavior constitutes a **calculated attempt to defraud**, frustrate, and suppress the legal rights of our client through lack of transparency and neglect.

### APPLICABLE LEGAL BREACHES

The conduct of **PWAN HOMES** and its representatives constitutes violations of the following laws:

- **Advance Fee Fraud** – Section 419, Criminal Code Act.
- **Criminal Breach of Trust** – Section 312, Criminal Code Act.
- **False and Misleading Advertisement** – Section 14, FCCPA 2019.
- **Breach of Contract** – Failure to allocate land or issue agreed documents after full payment.
- **Conspiracy to Defraud** – Section 516, Criminal Code Act.

### RELIEFS SOUGHT

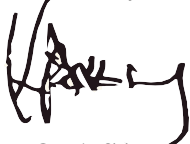
We humbly urge the relevant authorities to:

1. **Investigate the fraudulent actions** of PWAN HOMES and its agents.
2. **Compel the immediate allocation** of our client's plot at Ilosiwaju Estate, with all due documentation (Survey Plan, Deed of Assignment, Allocation Letter, etc.).
3. In the alternative, **order a full refund of ₦1,500,000**, with interest and damages for stress and emotional hardship.
4. **Prosecute all culpable directors and agents** under applicable criminal laws.
5. **Blacklist PWAN HOMES** and freeze further real estate transactions pending resolution of all complaints.

### ATTACHED DOCUMENTS (EVIDENCE)

1. Proof of payment of **₦1,500,000** to PWAN HOMES.
2. Screenshots or copies of all unanswered email correspondence.

Yours faithfully,



**AKINOIA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the alleged petitioner*

## SURVEY FEE

Sold To: [REDACTED]

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


Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Providus Bank Plc	1	ILOSIWAJU GARDENS	

Description	Line Total
Being Final payment for One(1)plot of Land at ILOSIWAJU GARDENS	N 150,000.00
Amount in words: One Hundred and Fifty Thousand Naira Only.	
	Subtotal N 150,000.00
	Tax N 0.00
	Total N 150,000.00

Additional Information:	
Total Amount:	N 200,000.00
Outstanding Balance:	N 0.00
Size per Plot:	500Sqm

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature




OFFICE: Km42, Iekki-Epe Expressway Opposite Children's Place Plaza,  
 By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos  
 Tel: +234-8180000652, +234-8180000637  
 Email: pwanmaxproperties@gmail.com

## Deed of Assignment

Sold To: [REDACTED]

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


Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Providus Bank Plc	1	ILOSIWAJU GARDENS	

Description	Line Total
Being payment for One(1)plot of Land at ILOSIWAJU GARDENS	N 100,000.00
Amount in words: One Hundred Thousand Naira Only.	
	Subtotal N 100,000.00
	Tax N 0.00
	Total N 100,000.00

Total Amount: N 100,000.00	
Outstanding Balance: N 0.00	
Size per plot	500Sqm

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature




OFFICE: Km42, Lekki-Epe Expressway Opposite Children's Place Plaza,  
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Email: pwanmaxproperties@gmail.com

## Developmental Fee

Sold To: [REDACTED]

Date:  
Receipt #:  
File #:  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Providus Bank Plc	1	ILOSIWAJU GARDENS	
Description			Line Total	
Being payment for One(1)plot of Land at ILOSIWAJU GARDENS			N 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo			Subtotal	N 500,000.00
			Tax	N 0.00
			Total	N 500,000.00
Additional Information:				
Total Amount: N 500,000.00				
Outstanding Balance: N 0.00				
Size per Plot: 500Sqm				

FOR PWAN Max Properties Ltd:
OYEYEMI QUAMDEEN
Signature



OFFICE: Km42, Lekki-Epe Expressway Opposite Children's Place Plaza,  
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos  
Tel: +234-8180000652, +234-8180000637  
Email: pwanmaxproperties@gmail.com

## Sales Receipt

Sold To: [REDACTED]

Date:  
Receipt #:  
File #:  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Providus Bank Plc	1	ILOSIWAJU GARDENS	6Mths
Description			Line Total	
Being Final payment for One(1)plot of Land at ILOSIWAJU GARDENS			N 350,000.00	
Amount in words: Three Hundred Fifty Thousand Naira and Zero Kobo			Subtotal	N 350,000.00
			Tax	N 0.00
			Total	N 350,000.00
Additional Information; PROMO OF 30% DISCOUNT				
Total Amount:		N 650,000.00		
Outstanding Balance:		N 0.00		
Size per Plot:		500Sqm		

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature

