



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 FOR FAILURE TO ALLOCATE LAND
AFTER PAYMENT OF ₦4,207,500.00 (FOUR MILLION, TWO HUNDRED AND
SEVEN THOUSAND, FIVE HUNDRED NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as "the alleged petitioner") to lodge a formal petition against **PWAN Group**, specifically its subsidiary **PWAN HOMES**, for failure to fulfill contractual obligations relating to a land purchase despite full payment made over **eight years ago**.

FACTS OF THE CASE:

1. In **2017**, the petitioner made a **full and final payment of ₦4,207,500.00 (Four Million, Two Hundred and Seven Thousand, Five Hundred Naira Only)** to **PWAN HOMES**, a subsidiary of PWAN Group, for the purchase of a **half plot of land** at their estate known as **Hectare of Diamond 2 (HOD2)**, located in the **Lekki-Ajah axis of Lagos State**.
2. Following payment, the petitioner received all relevant documentation, including:
 - Contract of Sale
 - Payment Receipt
 - Payment Confirmation
 - Land Allocation Letter
3. Despite receiving these documents, **no physical allocation of land has been made to date**, and no genuine efforts have been observed from PWAN HOMES to fulfil its legal obligations.

4. Over the past **eight years**, the petitioner made **repeated follow-up attempts** via calls and messages. Initially, PWAN HOMES offered **false reassurances**, but over time, they **completely stopped responding**, abandoning their responsibility and breaching all trust.

APPLICABLE LEGAL BREACHES:

The actions and inactions of PWAN HOMES constitute clear violations of Nigerian law, including:

1. **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust.
2. **Section 419 of the Criminal Code Act** – Prohibiting obtaining property or credit under false pretences.
3. **Basic contract law principles and consumer protection regulations** – Which require that parties to a contract fulfill their obligations in good faith and within a reasonable time.

RELIEFS SOUGHT:

In light of the above, we respectfully request that your esteemed office:

1. **Launch an investigation** into PWAN HOMES and PWAN Group for fraudulent practices and failure to honour legally binding contracts.
2. **Prosecute all officers and representatives** found responsible for this deliberate breach of trust.
3. **Compel PWAN HOMES to either:**
 - Provide immediate physical land allocation as originally contracted, or
 - Refund the full amount of **₦4,207,500.00** with applicable interest for the eight-year delay.
4. Take **regulatory and consumer protection actions** to protect the public from further exploitation by the said company.

ATTACHED DOCUMENTS:

- Contract of Sale
- Payment Receipt
- Payment Confirmation
- Land Allocation Letter
- Additional supporting documents (available on request)

We trust that your office will give this petition **urgent and impartial attention** in the interest of justice and consumer protection.

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-Epe Expressway
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

March 14, 2018



Dear Valued Client,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: HECTARES OF DIAMOND PHASE 2 ESTATE

No of Plots: 0.5 PLOT


Plot Details: BLOCK G PLOT 1A

Date of Allocation: 14TH MARCH, 2018

Note that this letter is temporary pending the receipt of your survey plan.
Subsequently, you are responsible for the clearing of your land.

Thanking you for confiding in us.

Yours faithfully,


EZUMEZU IKENNA
AUTHORISED SIGNATORY


NWOKOLO OBINNA C. K.
AUTHORISED SIGNATORY

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www.pwanhomes.com



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Tel: +234 1 2957206. Emails: pwanltd@yahoo.com, info@pwanhomes.com

21st October, 2017

Dear Sir & Ma,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment for **Half (1/2) Plot** of land at **Hectares of Diamond Phase 2** Situate at **Sangotedo Village, Behind Monastery in Eti-Osa Local Government Area, Lagos State.**

Please find below the description of the Land you purchased:

LOCATION: Sangotedo Village, Behind Monastery in Eti-Osa Local Government Area, Lagos State.

TYPE/SIZE: Half (1/2) Plot of undeveloped parcel of land measuring 300sqm.

TITLE: Undeveloped parcel of Land undergoing excision from the Lagos State Government.

You are required to make the following payments:

1. **Provisional Survey Plan Fee:** To pay the sum of ₦50,000 only per plot, being the payment for your Provisional Survey Plan fee to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of ₦70,000 only per plot for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of ₦200,000 only per plot, being the payment for your Deed of Assignment.
4. **Development Fee:** We would kindly advice you on the cost for the Development fee at a later


date.

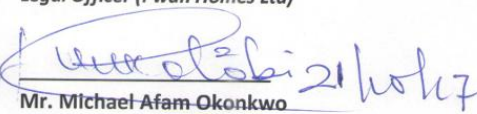
Payment shall be made into any **Diamond Bank** branch. Account Name: **PWAN HOMES LTD CAPITAL PROJECT**, Account Number: **0047947873**.

Your registered Survey Copies containing full details of your plot shall be made available to you after your physical allocation and confirmation of payment as indicated above.

Thank you so very much for partnering with us to make home ownership dreams a reality for as many people as we possibly can.

Sincerely,


Barr. Orevaoghene Araka
Legal Officer (Pwan Homes Ltd)


Mr. Michael Afam Okonkwo
Managing Director (Pwan Homes Ltd)

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HEAD OFFICE Floor 1 to 5 Furi Mall Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ajo, Ajah, Lagos
IKERJA OFFICE 16A Sule Abuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[REDACTED]

Date: Oct 19, 2017

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Outright	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	

Description	Line Total	
Being full payment for 0 Plot(s) of [HOD 2] Land at Hectares of Diamond 2 (HALF PLOT)	N 3,825,000.00	
Being full payment for 1 Unit(s) of [CORN-PC] Extra Payment for Corner Piece Plot	N 382,500.00	
Amount in words: Four Million, Two Hundred Seven Thousand, Five Hundred Naira and Zero Kobo Only	Subtotal	N 4,207,500.00
	Tax	N 0.00
	Total	N 4,207,500.00

Additional Information

Additional Information

Total Amount: ₦ 4,207,500.00
Outstanding Balance: ₦ 0.00
Plot Size: 300 Sqm
Discount: 10.0%

FOR PWAN Homes Ltd:

UDEOKOYE GERARD

Signature



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10/23/2017

Aranmolate COS 1.jpeg

CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD
(THE VENDOR)

AND

[REDACTED]

IN RESPECT OF HALF (1/2) PLOT OF A CORNER PIECE LAND AT HECTARES OF
DIAMOND PHASE 2 ESTATE SITUATE AT SANGOTEDO VILLAGE, BEHIND
MONASTERY IN ETI-OSA 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,
IKEJA,
LAGOS.



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23/2017

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THIS AGREEMENT is made this 25 day of OCTOBER 2017

BETWEEN

PWAN HOMES LTD a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its office at No.6, Ogbeni Street by Golden Park Estate, Ogidan, Sangotedo, Ajah, Lagos State (hereinafter referred to as 'THE VENDOR' which expression shall wherever the context so admits include its assigns, legal representatives and successors-in-title) of the one part.

AND

[REDACTED] of 3418 Hardy Street,
APT17, Hattiesburg MS, United States of America (hereinafter referred to as 'THE PURCHASER' which expression shall wherever the context so admits include his heirs, assigns and legal representatives) of the other part.

WHEREAS:

1. The Vendor is a real estate Marketing and Investment Company engaged in the acquisition of tracts of land and development of estates which is laid out into schemes and gated estates and are thereafter allocated to Subscribers to the Schemes.
2. The Vendor has acquired a vast tract of land measuring 600 square meters each per plot situate and described as HECTARES OF DIAMOND PHASE 2 ESTATE.
3. The Vendor with intent to achieve its object of development of Schemes has procured HECTARES OF DIAMOND PHASE 2 ESTATE hereinafter referred as 'the Scheme', whereby interested person

(s) or organization subscribes to the Scheme by way of monthly, quarterly contribution or outright payment towards ownership of plot(s) of land within the Scheme.

IT IS HEREBY AGREED that the Purchaser have fully subscribed to Half (1/2) Plot of a Corner Piece land (measuring 300 square meters) and the Vendor shall allocate same within the Scheme to the Purchaser under the following terms and conditions:

- a) The Purchaser has paid the purchase sum of ₦4, 207,500 (Four Million, Two Hundred and Seven Thousand Five Hundred Naira) for the full subscriptions of the said Half (1/2) Plot of a Corner Piece land at HECTARES OF DIAMOND PHASE 2 ESTATE, the receipt of which the Vendor hereby acknowledges.
- b) The Purchaser shall bear the cost of the preparation of a Survey Plan in his name which shall be [REDACTED]
- c) The Purchaser shall contribute his proportionate share/cost of infrastructure and development levies to be communicated to subscribers at the appropriate time.
- d) The Purchaser shall endorse and comply with the Rules and Regulation of the Scheme to be provided by the Vendor prior to during or after the allocation of the Half (1/2) Plot of a Corner Piece Land within the Scheme.
- e) The Vendor shall allocate the Half (1/2) Plot of a Corner Piece land within the Scheme as subscribed for by the Purchaser.
- f) The Vendor shall from time to time make rules and regulations or issue directives towards the realization of the functionality of the Scheme.



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1/1

GTBANK ONLINE TRANSFER ADVICE



Guaranty Trust Bank plc

RC 140323

Transaction Date: 19-Oct-2017

Reference Number: 230/1875216/19Oct2017_19102

Transaction Type: GTB-ThirdParty Transfer

Sender: [REDACTED]

Receiver: PWAN HOMES LTD

Account Number: [REDACTED]

Account Number: 0141941056

Transaction Amount : NGN 4,207,500.00

Receiving Bank: GTBANK

Amount In words: Four Million Two Hundred Seven Thousand Five Hundred Naira Only.

TRANSFER BETWEEN CUSTOMERS via Internet Banking from [REDACTED]
Remarks: PWAN HOMES LTD

Disclaimer

Your transfer has been successful and the beneficiary's account will be credited. However, this does not serve as confirmation of credit into the beneficiary's account. Due to the nature of the Internet, transactions may be subject to interruption, transmission blackout, delayed transmission and incorrect data transmission. The Bank is not liable for malfunctions in communications facilities not within its control that may affect the accuracy or timeliness of messages and transactions you send. All transactions are subject to verification and our normal fraud checks