



**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 GROUP (PWAN PRO - SIMPLY PROFESSIONAL)  
OVER FAILURE TO RELEASE SURVEY PLAN AND OBSTRUCTION OF LAND  
RESALE AFTER FULL PAYMENT OF ₦7,500,000.00 (SEVEN MILLION, FIVE  
HUNDRED THOUSAND NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as “the alleged petitioner”) to formally lodge a complaint against **PWAN PRO (Simply Professional)**, a subsidiary of **PWAN Group**, for **refusal to release survey plan, failure to cooperate during resale, and demanding unjustified additional payments**—despite full payment being made over three years ago.

**FACTS OF THE CASE:**

1. In **2021**, the petitioner purchased **five (5) plots of land** with an additional **one (1) bonus plot**—a total of **six (6) plots**—in **Zion Gate Phase 1 Scheme 2 Estate** from **PWAN PRO**, for a total payment of **₦7,500,000.00** (Seven Million, Five Hundred Thousand Naira Only).
2. While the company did eventually email physical allocation documents, **no survey plan** was issued to the petitioner—despite the transaction being completed in full.
3. In **2024**, the petitioner sought to resell the land and contacted the original agent, who initially advised waiting for market appreciation. Upon insisting, the petitioner was referred back to **PWAN PRO**.

4. PWAN PRO then advised that the petitioner could find a buyer independently, after which they would assist with documentation. However, when a third-party agent requested a **survey plan** to proceed, PWAN PRO failed to provide it.
5. Repeated emails and messages (including via Instagram) have gone unanswered, except for an **unexpected demand for further payment**—either for a **Deed of Assignment** or **survey plan fees**—despite evidence that a **company survey exists**.
6. This conduct has caused emotional distress, financial hardship, and loss of confidence in the real estate practices of the PWAN Group.

## RELEVANT LEGAL BREACHES:

The conduct of PWAN PRO violates multiple provisions of Nigerian law, including:

- **Breach of Contract** – refusal to deliver all agreed-upon post-sale documentation.
- **Fraudulent Misrepresentation** – promising a company survey while withholding it at resale.
- **Unethical Obstruction** – interfering with the petitioner’s legal right to resell their property.
- **Section 419 of the Criminal Code Act** – criminalizing obtaining by false pretence.

## RELIEFS SOUGHT:

The petitioner seeks the intervention of your esteemed office to:

1. **Investigate PWAN PRO and its officers** for potential criminal and unethical real estate practices.
2. **Compel the immediate release** of the **survey plan and all relevant legal documents**.
3. **Enforce full refund (if resale is frustrated)** or enable unimpeded resale of the plots with full legal support.
4. **Sanction the company** for predatory and obstructive conduct against law-abiding citizens and diaspora investors.

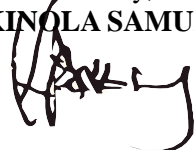
## ATTACHED DOCUMENTS:

- Allocation letters from PWAN PRO
- Payment confirmation receipts totaling ₦7.5 million
- Email communications with PWAN PRO

We hope this complaint will receive urgent and decisive attention from your esteemed office.

Yours faithfully,

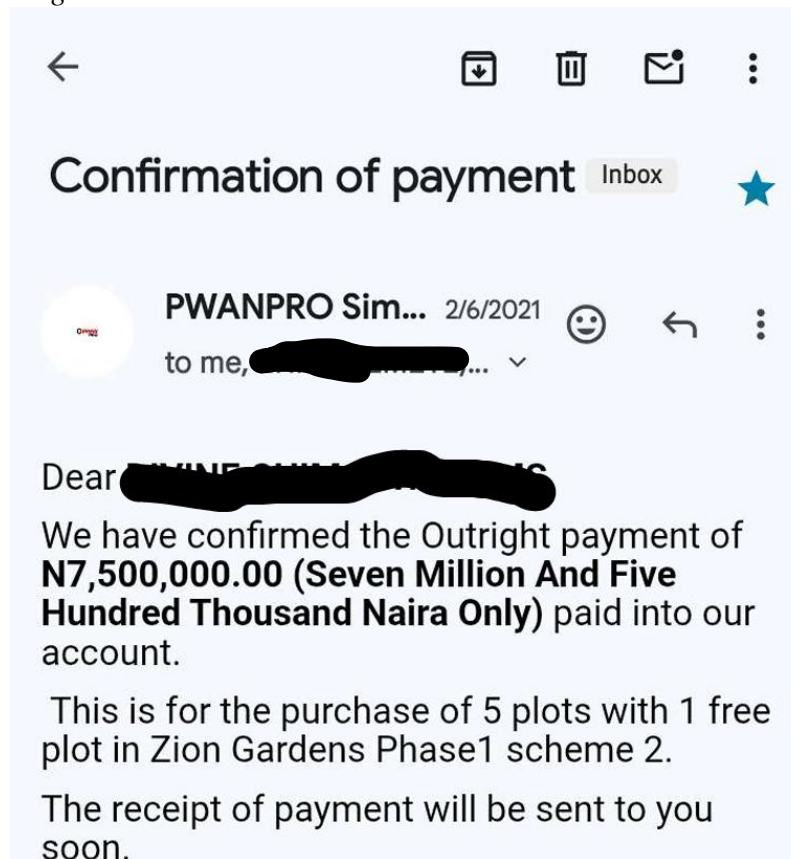
**AKINOLA SAMUEL ELUYEFA ESQ**



*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*





CDV Court 1 Ologolo Road Opp. Catholic Church of Epiphany,  
Lekki Phase 2, Ajah, Lagos State.  
08181888837

4<sup>TH</sup> FEBRUARY, 2021

[REDACTED]

Dear Sir,

**PAYMENT NOTIFICATION LETTER**

Sequel to the receipt of your payment of **₦7,500,000.00** (Seven Million Five Hundred Thousand Naira) for **Five (5) Residential plots (plus free 600sqm plot)** of Land at **Zion Gardens Estate Phase 1 Scheme 2** situate at **Oko Imedu Community, Owode Ise, Ibeju-Lekki Local Government Area, Lagos State**.

Please find below the description of the Land (s) you purchased:

**LOCATION:** Oko Imedu Community, Owode Ise, Ibeju-Lekki Local Government Area, Lagos State.

**TYPE/SIZE:** Five (5) Residential plots (plus free 600sqm plot) of undeveloped parcel of Land measuring **600sqm** each.

**TITLE:** Deed of Assignment and Survey.

You are required to make the following payments:

1. **Provisional Survey Plan Fee:** To pay the sum of **₦50,000** per plot, being the cost for your Provisional Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of **₦30,000** per plot, for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of **₦100,000** per plot, being the payment for your Deed of Assignment.
4. **Development Fee:** We would kindly advice you on the cost for the development levy at a later date.

Payments shall be made into any Zenith Bank branch. Account Name: **Pwan Pro Realtors and Estates Limited**. Account Number: **1016082251**.

Your Provisional 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,



CDV Court 1, Opposite Catholic Church of the Epiphany,  
Ologolo Road, Lekki Peninsula Phase 2, Lekki Lagos.  
08181888837

[REDACTED]

Dear Valued Client,

**PHYSICAL ALLOCATION NOTIFICATION**

You are hereby notified of your allocation as follows:

**Estate Name:** ZION GARDENS PHASE 1 SCHEME 2, LAGOS.

**No of Plots:** 6 PLOTS (600SQM PER PLOT)

**Plot Type:** RESIDENTIAL

**Plot Details:** BLOCK F4 PLOT 6, 7, 8, 9, 10, 11

**Date of Allocation:** DECEMBER 17<sup>TH</sup> 2022

**NB:** This letter is temporary pending the receipt of your survey plan.

Subsequently, you are responsible for the clearing of your land after allocation.

Thanking you for choosing **PWAN PRO REALTORS AND ESTATES LTD.**

Yours faithfully,



Contact Address: C&V Court 1, Opposite Catholic Church Of The Epiphany,  
Ologolo Road, Lekki Lagos.  
Phone: 08181888837,  
Whatsapp: 08181888835.  
Email Address: pwanpronigeria@gmail.com

### Sales Receipt

Sold to:

Date:

Receipt #:

File #:

| Payment Method   | Reconciling Bank | Land Location  | Duration       |
|--|------------------|--|----------------|
| OUTRIGHT   | ZENITH BANK      | ZION GARDENS 1.2   | OUTRIGHT       |
| Qty  | Size #           | Description  | Amount         |
| 5.00   | 600SQM           | Outright Payment for Five(5) with One(1) free residential plots of land at ZION GARDENS Phase 1 Scheme 2 Estate. | 7,500,000.00   |
|  |                  |  | 7,500,000.00   |
| Amount in words: Seven Million, Five Hundred Thousand naira Only |                  |  | Total Discount |
|  |                  |  | Subtotal       |
|  |                  |  | Sales Tax      |
|  |                  |  | Total          |
| Total Amount   |                  |  | 7,500,000.00   |
| Outstanding Bal:   |                  |  |                |
| FOR PWAN Pro Realtors and Estate Ltd:                            |                  |  |                |
| EGUNLUSI ADEWALE   |                  |  |                |

## CONTRACT OF SALE

BETWEEN

**PWAN PRO REALTORS AND ESTATES LIMITED**  
(THE VENDOR)

AND

[REDACTED]

IN RESPECT OF FIVE (5) RESIDENTIAL PLOTS (PLUS 600SQM FREE PLOT)