

**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 FOR FAILURE TO ALLOCATE LAND  
AFTER PAYMENT OF ₦1,650,000.00 (ONE MILLION, SIX HUNDRED AND FIFTY  
THOUSAND NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, particularly in respect of **Lekki Villa Phase One, Bogije, Ibeju-Lekki LGA**, for its failure to deliver land allocation despite full payment and issuance of allocation documentation.

**FACTS OF THE CASE:**

1. In **2015**, the alleged petitioner made full payment of **₦1,650,000.00** (One Million, Six Hundred and Fifty Thousand Naira Only) for the purchase of a plot of land located at **Lekki Villa Phase One**, situated in **Bogije, Ibeju-Lekki Local Government Area**, Lagos State.
2. Following this payment, PWAN Group issued:
  - o **Sales Receipt**
  - o **Physical Allocation Document**
3. However, despite being issued the above documents, **no actual land has been allocated** to the petitioner to date.
4. The petitioner has made multiple **follow-up visits and calls** to PWAN offices over the years, only to be met with repeated **excuses and shifting narratives**.
5. This prolonged delay constitutes a **breach of contractual agreement** and is evidence of possible misrepresentation or intent to defraud.

## **APPLICABLE LEGAL BREACHES:**

PWAN Group's actions are potentially in violation of the following provisions of Nigerian law:

1. **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust.
2. **Section 419 of the Criminal Code Act** – Obtaining property by false pretences.
3. **Breach of Contract under Nigerian Civil Law** – Non-performance after receipt of consideration.
4. **Nigerian Consumer Protection Framework** – Duty to deliver paid-for services and fair treatment.

## **RELIEFS SOUGHT:**

We respectfully request that your office:

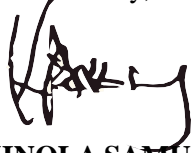
1. **Investigate** PWAN Group for breach of contractual obligations regarding Lekki Villa Phase One, Bogije.
2. **Prosecute responsible officers** of the company if fraudulent misrepresentation or criminal breach of trust is established.
3. Compel PWAN Group to **either allocate the agreed plot of land** immediately or issue a **full refund of ₦1,650,000.00** with appropriate interest.
4. Impose **sanctions or regulatory enforcement** to protect other citizens from such exploitative practices.

## **ATTACHED DOCUMENTS:**

- Sales Receipt
- Allocation Letter

We trust this complaint will be given prompt attention in the interest of justice, consumer protection, and public accountability.

Yours faithfully,





**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*

 <b>PWAN HOMES</b> <small>making home ownership dreams a reality</small>		<ul style="list-style-type: none"><li>■ Real Estate &amp; Property Development</li><li>■ Consultancy</li><li>■ Land Survey</li><li>■ Logistics</li></ul>			
Sold to: [REDACTED]		Sales Receipt Date: [REDACTED] Receipt #: [REDACTED] File #: [REDACTED]			
Payment Method	Reconciling Bank	Land Location			
OUTRIGHT	ZENITH BANK	Lekki Villa Estate			
Qty	Size #	Description	Amount	Discount	Line Total
11.00	675 Sqm	Full Payment for One(1) plot of land at Lekki Villa Estate.  Commercial	1,650,000.00		1,650,000.00

Amount in words: One Million, Six Hundred and Fifty Thousand Naira Only	Total Discount	Subtotal	1,650,000.00
		Sales Tax	
		Total	1,650,000.00
FOR PWAN HOMES LTD:	Signature		
Received By:	Signature		
Contact Address: 6, Ogbeni Street, By Golden Park Estate, Ogidan Sangotedo, Ajah - Lagos. 08029595951, 08121040406. Email Address: pwanltd@yahoo.com			

## CONTRACT OF SALE

BETWEEN


**PWAN HOMES LTD**  
(THE VENDOR)

AND

[REDACTED]  
(THE PURCHASER)

IN RESPECT OF ONE (1) PLOT OF LAND AT LEKKI VILLA PHASE 1 SITUATE AT BOGILE, IN IBEJU-LEKKI LOCAL GOVERNMENT AREA, LAGOS STATE

Prepared by,  
Amarachi Ezimano (Barr)  
Legal Practitioner  
c/o PWAN Homes Ltd.  
No. 6, Ogbeni Street by Golden Park Estate,  
Ogidan, Sangotedo,  
Ajah,  
Lagos State  
234-8029595951  
[legal@pwanhomes.com](mailto:legal@pwanhomes.com)





- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

DATE: 5TH APRIL, 2017

Dear Valued Client,



### PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: LEKKI VILLA PHASE 1 ESTATE

No of Plots: 1 PLOT


Plot Details: BLOCK E PLOT 15

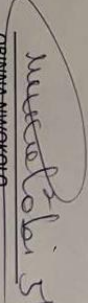
Date of Allocation: 5TH APRIL, 2017

Note that this letter is temporary pending the receipt of your survey plan.

Thanking you for confiding in us.

Yours faithfully,

  
05/04/2017  
TUNDE OLUWANIYI  
AUTHORISED SIGNATORY

  
OBINNA NWOKO  
AUTHORISED SIGNATORY