

07077513836

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

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 ONE (1)
RESIDENTIAL PLOT OF LAND FULLY PAID FOR AT OAKWOOD PARK 2 ESTATE,
IBEJU-LEKKI, LAGOS STATE - ₦1,200,000**

We write on behalf of our client (hereinafter referred to as “**the Petitioner**”) to formally petition **PWAN Group** for **breach of contract, fraudulent misrepresentation, and deliberate refusal** to allocate **one (1) residential plot of land** fully paid for by the Petitioner at **Oakwood Park 2 Estate, Ibeju-Lekki, Lagos State**.

FACTUAL SUMMARY

1. The Petitioner was introduced to **PWAN Group** by his elder brother in **2016**, when his brother was working with the company.
2. Relying on this recommendation, the Petitioner purchased **one (1) residential plot of land** at **Oakwood Park 2 Estate, Ibeju-Lekki, Lagos State**, and paid the full agreed sum of **₦1,200,000 (One Million, Two Hundred Thousand Naira Only)** covering the purchase price and initial documentation.
3. PWAN Group assured the Petitioner that the plot would be **immediately allocated within a few weeks** of payment.
4. Since 2016, despite multiple visits, calls, and follow-up messages, **no physical allocation** has taken place.

5. PWAN Group's excuses have ranged from "allocation is done in batches" to "after the rainy season," promising that the Petitioner would be called — yet **no genuine action has ever followed**.
 6. On each visit to their office, the Petitioner has witnessed **other buyers facing the same problem**, many of whom have had to create scenes to demand answers — showing a **pattern of collecting money from multiple buyers without land or refund**.
 7. After years of waiting in vain, the Petitioner grew tired and came to regard the transaction as a **bad investment**, having lost all faith in PWAN's promises.
 8. The Petitioner would now be **grateful to at least receive a full refund**, even though the present value of money cannot be compared to the amount paid nearly **nine years ago**.
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ALLEGED OFFENSES

The actions of PWAN Group in this matter constitute:

- **Breach of Contract** — for failing to allocate the plot as agreed;
 - **Obtaining Money Under False Pretences** — contrary to **Section 419 of the Criminal Code Act**;
 - **Criminal Breach of Trust** — contrary to **Section 312 of the Criminal Code Act, Cap C38, LFN 2004**;
 - **Conspiracy to Defraud** — contrary to **Section 516 of the Criminal Code Act**;
 - **Unfair Trade Practices and Misrepresentation** — contrary to the **Federal Competition and Consumer Protection Act (FCCPA), 2019**;
 - **Advance Fee Fraud** — contrary to the **Advance Fee Fraud and Other Fraud Related Offences Act, 2006**.
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RELIEFS SOUGHT

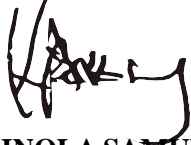
In view of the above, we respectfully request that your esteemed office:

1. **Investigate** PWAN Group, including its directors, managers, and field agents responsible for the sale and marketing of **Oakwood Park 2 Estate, Ibeju-Lekki, Lagos State**.
 2. Compel PWAN Group to either:
 - **Immediately allocate** the fully paid-for residential plot with valid title documents; or
 - Refund the total sum of **₦1,200,000**, with accrued interest and compensation for wasted time and emotional hardship.
 3. Prosecute any officers or agents found culpable of fraudulent misrepresentation, misuse of funds, or conspiracy to defraud.
 4. Enforce regulatory measures to protect other innocent buyers from similar fraudulent and deceptive real estate practices.
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ATTACHED DOCUMENTS

- Official receipt(s) evidencing the **₦1,200,000** payment;

Yours faithfully,

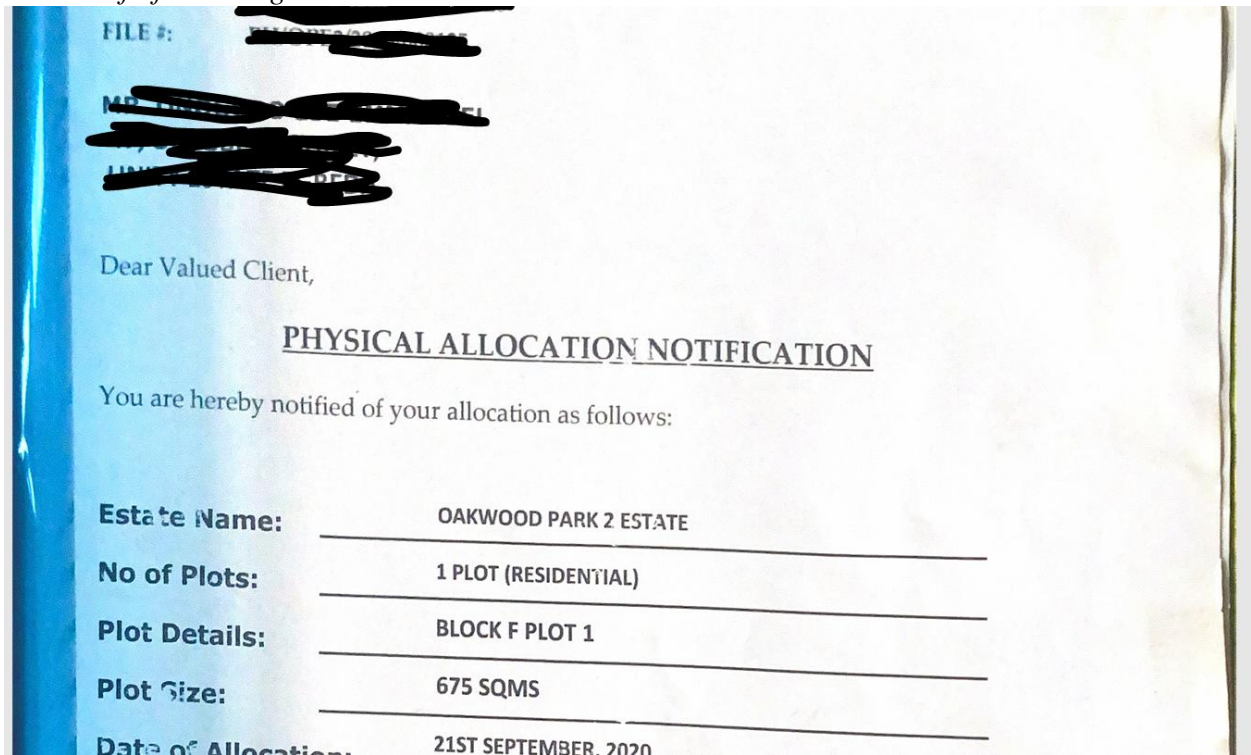


AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



FILE #: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Valued Client,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name:	OAKWOOD PARK 2 ESTATE
No of Plots:	1 PLOT (RESIDENTIAL)
Plot Details:	BLOCK F PLOT 1
Plot Size:	675 SQMS
Date of Allocation:	21ST SEPTEMBER, 2020



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

Dear [REDACTED]

**ALLOCATION NOTIFICATION LETTER FOR ONE PLOT OF LAND AT OAKWOOD PARK PHASE 2 ESTATE,
ELERANIGBE AREA, IBEJU-LEKKI LGA**

We write to notify you that One (1) plot of land shall be allocated to you at **Oakwood Park Phase 2, Eleranigbe, Ibeju-Lekki Local Government Area of Lagos State.**

Please find below the description of the allocation:

LOCATION: Eleranigbe, Ibeju-Lekki Area of Lagos State.

SIZE: One (1) plot of Undeveloped land measuring 648sqm.

TITLE: Undeveloped parcel of Land presently going through the process of excision at the Ministry of lands, Alausa, Lagos State.

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).

CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD
(THE VENDOR)

AND

[REDACTED]
MR. [REDACTED]

THIS AGREEMENT is made this 1st day of July ~~2018~~

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

~~_____~~ (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 **648 square meters each** situate and

4. **THE VENDOR COVENANT WITH THE PURCHASER** as follows:

1. To allocate **One (1) plot** of Land to the PURCHASER at the time of allocation in **OAKWOOD PARK PHASE 2** situate at Eleranigbe Area of Ibeju-Lekki Local Government Area, Lagos State.
2. To refund to the PURCHASER the total money paid less 10% administrative charges and 30% Agency Fee, if the PURCHASER is no longer interested in the scheme at any time before taking full possession.
3. The Vendor hereby indemnifies the Purchaser against loss (es) or adverse claim over the said **One (1) plot** allocated to the Purchaser within the Scheme.

5. **THE PURCHASER HEREBY COVENANTS WITH THE VENDOR** as follows:

- a. To pay for his Survey and legal fees in respect of the **One (1) plot** of land.
- b. If the PURCHASER wishes to withdraw from this scheme at any time:
 - i. To give a notice of 90 days, and 60 days thereafter if the refund is not ready at the expiration of the 1st notice.
 - ii. An administrative charge of 10% and 30% Agency fee shall be deducted.

6. **IT IS HEREBY FURTHER** agreed that:

- a. The **PURCHASER** has been briefed and is fully aware of the status of the land and has agreed to purchase the land as it is.
- b. Both parties covenant to uphold these presents.

IN WITNESS WHEREOF, the Parties have hereto set their hands and sealed the day and year first above written.

THE COMMON SEAL of **THE VENDOR** is affixed
PWAN HOMES LTD
IN THE PRESENCE OF:




DIRECTOR








SECRETARY

SIGNED, SEALED AND DELIVERED

By the within named 






In the presence of:

Name: 
Address: 
Occupation: 
Signature: 

 **PWAN HOMES**
making home ownership dreams a reality

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

Sales Receipt

Sold to: 
Date: 
Receipt #: 
File #: 

Payment Method	Reconciling Bank	Land Location	DURATION
OUTRIGHT	GTBANK PLC	OAKWOOD PARK 2 Estate	NIL

Size #	Description	Unit Price	Discount	Line Total
1.00	648 Sqm	Full Payment for One(1) plot of land at OAKWOOD PARK 2 Estate.	1,200,000.00	1,200,000.00