



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 ₦5,400,000.00 (FIVE MILLION, FOUR HUNDRED THOUSAND NAIRA ONLY)

We write on behalf of our client (hereinafter referred to as “the alleged petitioner”) to formally petition **PWAN Group**, specifically its subsidiary **PWAN HOMES**, over its failure to fulfil contractual obligations regarding the allocation of six plots of land purchased since **November 2016**.

FACTS OF THE CASE:

1. In **November 2016**, the alleged petitioner made a full and outright payment of **₦5,400,000.00 (Five Million, Four Hundred Thousand Naira Only)** to **PWAN HOMES** for the purchase of **four plots** of land, with an additional **two bonus plots** (making a total of six plots), as part of the estate’s promotional offer.
2. Following the payment, the petitioner received documentation including:
 - Contract of Sale
 - Receipt of Initial Payment
 - Letter of Allocation
 - Letter of Allocation Notification (with appended payment receipt)

- Bank Transaction Notifications (confirming all three payments made)
- 3. Despite receiving these documents and numerous follow-up actions—including **physical visits to PWAN HOMES’ office and several emails sent since 2018—no physical land has been allocated to the petitioner** to date.
- 4. The continued **delays, lack of communication, and refusal to honour the agreement** amount to a **breach of contract, abuse of trust, and possible fraudulent misrepresentation**.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN HOMES and its representatives potentially violates the following laws of the Federal Republic of Nigeria:

1. **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust.
2. **Section 419 of the Criminal Code Act** – Offence of obtaining property under false pretences.
3. **Consumer Protection Framework** – Enforcing that service providers uphold terms of sale and fair treatment of customers.

RELIEFS SOUGHT:

Given the seriousness of this matter and the lengthy delay (approaching nine years), we respectfully request that your office:

1. **Investigate** PWAN HOMES and PWAN Group for breach of contractual obligations and possible fraudulent land transactions.
2. **Prosecute all officers and agents** involved in the failure to allocate land or refund payment in accordance with the law.
3. **Compel a full refund of ₦5,400,000.00** to the petitioner, with accrued interest or, alternatively, **ensure immediate allocation** of the agreed six plots of land.
4. Ensure that **regulatory and enforcement action** is taken to prevent other unsuspecting buyers from falling victim to similar misconduct.

ATTACHED DOCUMENTS:

- Contract of Sale
- Receipt of Initial Payment
- Letter of Allocation
- Letter of Allocation Notification (with receipt)
- Screenshots of Three Payment Transactions

We trust this matter will be treated with the urgency and seriousness it deserves in the interest of justice and public protection.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



15th December, 2016

HEAD OFFICE: No 6 Ogbeni Street, THERA ANNEX, off Lekki-Expressway-Epe, 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.

[REDACTED]

Dear Sir,

ALLOCATION NOTIFICATION LETTER FOR SIX PLOTS OF LAND AT FLOOD GATE ESTATE, EGAN FOWOBI AJEGBENWA VILLAGE IN IBEJU-LEKKI L.G.A

We write to notify you that Six (6) plots of land shall be allocated to you at Flood Gate Estate situate at Egan Fowobi Ajegbenwa Village in Ibeju-Lekki Area of Lagos State.

Please find below the description of the allocation:

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

SIZE: Six (6) plots of Undeveloped parcel of land measuring 600 square meters each.

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.

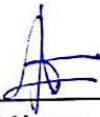
2. **Plot Demarcation Fee:** To pay the sum of ₦20,000 only per plot for your plot demarcation (4 Corner Piece).
3. **Deed of Assignment Fee:** To pay the sum of ₦100,000 only per plot, being the payment for your Deed of Assignment.
4. **Development Fee:** We would kindly advise you on the cost for the Development fee at a later date.

Payment shall be made into any **Diamond Bank** branch. Account Name: **Folkland Property Development Company**, Account Number: **0035628388**.

Your provisional Survey Copies containing full details of your plots shall be made available to you after your physical allocation.

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

Sincerely,



Barr. Emili Ajogwu
Legal Officer (Pwan Homes Ltd)



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

...making home ownership dreams a reality

www.pwanhomes.com

CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD
(THE VENDOR)

AND



(THE PURCHASER)

IN RESPECT OF FOUR (4) PLOTS PLUS 2 FREE PROMO PLOTS OF LAND AT FLOOD GATE ESTATE SITUATE AT EGAN FOWOBI AJEGBENWA VILLAGE OF IBEJU-LEKKI

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.
+2348060198680 or
01 453 4177

Page 1 of 3



THIS AGREEMENT is made this _____ day of _____ 2016

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, Ogldan, 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 600 square meters each per plot situate and described as FLOOD GATE ESTATE.
3. The Vendor with intent to achieve its object of development of Schemes has procured FLOOD GATE 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.



HEAD OFFICE Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Ado, Ajah, Lagos
IKEJA OFFICE 16A Sule Azuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12966848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[Redacted]

Date:
Receipt #:
File #:

[Redacted]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Flood Gate Estate	1 Mths

Description	Line Total
Being initial payment for 4 Plot(s) of [FGE] Land at Flood Gate Estate	N 1,100,000.00
Being initial payment for 2 Plot(s) of [FGE] Land at Flood Gate Estate (Free Plot on Promo)	0.0

Amount in words: One Million, One Hundred Thousand Naira and Zero Kobo Only	Subtotal	N 1,100,000.00
	Sales Tax	N 0.00
	Total	N 1,100,000.00

Additional Information

Total Amount: N 5,400,000.00
Outstanding Balance: N 4,300,000.00
Plot Size: 600 Sqm
Discount: 10.0%

FOR PWAN Homes Ltd:

Okoh Lawrence

Signature



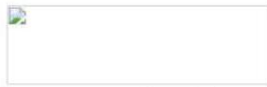


GeNS@gtbank.com

07/12/2016 ☆

To [REDACTED]
7 Dec 2016 at 09:48

gtbank.com



De: [REDACTED]

07-Dec-2016

Guaranty Trust Bank eElectronic Notification Service (GeNS)

We wish to inform you that a Debit transaction occurred on your account with us.

The details of this transaction are shown below:

Transaction Notification

Account Number : *****1166
Transaction Location : E-CHANNEL
Description : TRANSFER BETWEEN CUSTOMERS
Amount : 2,000,000.00
Value Date : 07-Dec-2016
Remarks : via Internet Banking Balance for Floodgate 4plots(+2 bonus) from [REDACTED] to
PWAN HOMES LTD
Time of Transaction : 10:48 AM
Document Number : 0

[REDACTED] AM are as follows;

Thank you for choosing Guaranty Trust Bank plc



"Your Internet Banking user ID and password, ATM card number and PIN are confidential and should never be disclosed to anyone"



GeNS@gtbank.com

23/11/2016 ☆

To [REDACTED]
23 Nov 2016 at 12:35

gtbank.com

De: [REDACTED]

23-Nov-2016

Guaranty Trust Bank eElectronic Notification Service (GeNS)

We wish to inform you that a Debit transaction occurred on your account with us.

The details of this transaction are shown below:

Transaction Notification

Account Number : *****1166
Transaction Location : E-CHANNEL
Description : TRANSFER BETWEEN CUSTOMERS
Amount : 2,300,000.00
Value Date : 23-Nov-2016
Remarks : via Internet Banking Part Payment to PWAN for FLOODGATE ESTATE from [REDACTED]
PWAN HOMES LTD
Time of Transaction : [REDACTED]
Document Number : 0

The balances on this account as at 1:35 PM are as follows;

Current Balance [REDACTED]
Available Balance [REDACTED]

Thank you for choosing Guaranty Trust Bank plc

"Your Internet Banking user ID and password, ATM card number and PIN are confidential and should never be disclosed to anyone"

TO: tekan_olufunmiwo@yahoo.com

10 Nov 2016 at 15:43

gtbank.com

Dear [REDACTED]

10-Nov-2016

Guaranty Trust Bank eElectronic Notification Service (GeNS)

We wish to inform you that a Debit transaction occurred on your account with us.

The details of this transaction are shown below:

Transaction Notification

Account Number : *****1166
Transaction Location : E-CHANNEL
Description : TRANSFER BETWEEN CUSTOMERS
Amount : 1,100,000.00
Value Date : 10-Nov-2016
Remarks : MBANKING [REDACTED] for 4plots in Floodgate Estate ANY Account
Transfer from [REDACTED] to PWAN HOMES LTD
Time of Transaction : 4:43 PM
Document Number : 0

The balances on this account as at 4:43 PM are as follows:

Current Balance [REDACTED]
Available Balance [REDACTED]

Thank you for choosing Guaranty Trust Bank plc

"Your Internet Banking user ID and password, ATM card number and PIN are confidential and should never be disclosed to anyone".

Kindly log on to our website www.gtbank.com OR



📍 Floor 1 - 5 Puri Mall Building, Km 25, Lekki Epe Expressway
Opposite Leawood Hotel (See Centre)
Oko Ado, Ajah, Lagos State
☎ +234-1-2956848, 234-14534177, 234-14533664

DATE: 7TH AUGUST, 2020
FILE #: PH/FGE/2016/00077

[REDACTED]

Dear Valued Client,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name:	FLOOD GATES ESTATE
No of Plots:	6 PLOTS (RESIDENTIAL, 2 FREE PLOTS)
Plot Details:	BLOCK A1 PLOT 2,3,4 & BLOCK A2 PLOT 2,3,4
Plot Size:	3600 SQMS

Plot Size: _____

Date of Allocation: _____

7TH AUGUST, 2020

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 HOMES LIMITED.

Yours faithfully,



7/8/2020

ARAKA OREVA
LEGAL/ADMIN



ANTHONIA ABAYOMI-O
ED/COO