



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

PETITION AGAINST PWAN FOR FAILURE TO ALLOCATE 3 PLOTS OF LAND AT PRAISE GARDENS PHASE 2 – TOTAL AMOUNT ₦2,250,000

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally lodge a complaint against **PWAN** for **non-allocation of land**, constituting **breach of contract, financial misconduct, and failure to deliver service after full payment**.

FACTS OF THE CASE:

- In good faith, the petitioner purchased **three (3) plots of land** at **Praise Gardens Phase 2**, located at **Ilori Village, Ode Omi, Lekki Free Trade Zone, Ibeju-Lekki, Lagos State**.
- The **total amount paid** for the three plots was **₦2,250,000 (Two Million, Two Hundred and Fifty Thousand Naira)**.
- Since the completion of payment, the petitioner has **not received physical allocation**, nor has any plot been shown or handed over.
- Repeated attempts to contact PWAN and its representatives have resulted in **no meaningful response**, only unfulfilled promises and lack of transparency.

APPLICABLE LEGAL BREACHES:

PWAN's conduct violates:

- **Section 419 of the Nigerian Criminal Code** – Obtaining money under false pretenses
- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust
- **Contract law principles** – Failure to perform a contractual obligation
- **Consumer Protection Laws** – Misrepresentation and denial of paid-for service

RELIEFS SOUGHT:

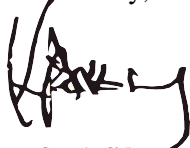
We respectfully seek that your esteemed office:

1. **Launch a thorough investigation** into PWAN's failure to allocate the three plots of land.
2. **Compel immediate physical allocation** of three genuine and dispute-free plots at Praise Gardens Phase 2.
3. **In the alternative, order a full refund** of ₦2,250,000 with interest to compensate for the time, emotional distress, and opportunity cost.
4. **Take regulatory or legal action** to protect future consumers from such practices.

ATTACHED DOCUMENTS:

- Payment Receipts
- Any correspondence with PWAN

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ
Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

PRAISE GARDENS ODE PHASE II

FREQUENTLY ASKED QUESTIONS /TERMS AND CONDITIONS OF PURCHASE

Q1. WHERE IS PRAISE GARDENS PHASE II?

A. PRAISE GARDENS ODE PHASE II is situated in ITUBARIKA VILLAGE, ODE-OMI, IBEJU-LEKKI, LAGOS STATE

Q2. WHO ARE THE OWNERS/ DEVELOPER OF PRAISE GARDENS ODE PHASE II?

A. PWAN LEKKI BUSINESS CONCERNS LTD, a Leading Real Estate Company in Lagos State.

Q3. WHAT TYPE OF TITLE DOES PRAISE GARDENS ODE PHASE II HAVE ON THE LAND?

A. Registered Survey plan approved by Lagos State Government & Excision File Number

Q4. ARE THERE ANY ENCUMBRANCES ON THE LAND?

A. The land is free from every known government acquisition or interest and adverse claims.

Q5. WHAT IS THE SIZE OF THE PLOT?

A. 600 & 300sqm

Q6. IS THE ROAD TO THE ESTATE MOTORABLE?

A. Yes the road to the estate is motor able.

Q7. WHAT OTHER PAYMENTS DO I MAKE APART FROM THE PAYMENT FOR THE LAND?

- | | |
|----------------------------------|---|
| (a) Deed of Assignment: | N100,000 only per plot |
| (b) Provisional Survey plan Fee: | N50,000 only per plot (subject to review) |
| (c) Plot demarcation: | N30,000 only per plot |
| (d) Developmental Fee: | N500,000. (Subject to review) |

Q8. WHEN DO I MAKE THE OTHER PAYMENTS?

- A. (i) Survey and Deed of Assignment payment can be made before or after the physical Allocation.
(ii) Development levy will be determined later.
(iii) Corner Plot Demarcation is N30,000 per plot payable after payment of the land and before physical Allocation of plot

Q9. WHAT DO I GET AFTER THE INITIAL DEPOSIT?



Km 30, Farm Bus-stop Adjacent To Blenco Supermarket
Lekki Epe-expressway, Ajoh, Lagos State, Nigeria.
Tel: +234 8188888746, +234 8188888749

1ST SEPTEMBER, 2020



Dear Sir,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment for Three (3) Plots of land at **Praise Gardens Phase II, Ode-Omi**, situate at **Itoru Village, Ode-Omi, Lekki Free Trade Zone, Ibeju Lekki, Lagos State**.

Please find below the description of the Land you purchased:

LOCATION: Itoru Village, Ode-Omi, after La Campagne Tropicana, Lekki Free Trade Zone, Ibeju Lekki, Lagos State.

TYPE/SIZE: Three (3) Plots of Undeveloped parcel of land measuring 600sqm each.

TITLE: Survey & Deed of Assignment.

You are required to make the following payments:

1. **Provisional Survey Plan Fee:** To pay the sum of N50,000 as the cost for your Provisional Survey Plan to be made in your name.
2. **Deed of Assignment Fee:** To pay the sum of N100,000 only per plot, being the payment for your Deed of Assignment.
3. **Plot Demarcation Fee:** To pay the sum of N30,000 only per plot for your plot demarcation.
4. **Development Fee:** The sum of N500,000 only per plot (Subject to Review)



Contact Address: KM 30, Lekki Epe Expressway, Farm Bus Stop
Adjacent to Blenco Supermarket, Ajah, Lagos State, Nigeria.
Phone: 0818888746, 0818888749.
Email Address: pwanlekk@gmail.com

Sales Receipt

Sold to:

[REDACTED]

Date:
Receipt #:
File #:

[REDACTED]

Payment Method		Reconciling Bank	Land Location	DURATION	
OUTRIGHT		ZENITH	PRAISE GARDEN ODE OMI	3 MONTHS	
Qty	OUTRIGHT	Description	Outright Per plot	Discount	Line Total
3.0	600 Sqm	Being 600 Sqm [REDACTED]			2,250,000.00

Amount in words: Two Million, Two Hundred and Fifty Thousand Naira Only.

Subtotal 2,081,250.00
Sales Tax 168,750.00
Total 2,250,000.00

Total Amount ₦ 2,250,000.00
Outstanding Bal: ₦ -

FOR PWAN LEKKI BUSINESS CONCERNS LTD:

MANAGING DIRECTOR

