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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 HOMES (PWAN GROUP) FOR LAND FRAUD, NON-ALLOCATION, AND BREACH OF CONTRACT – ₦1,730,000 TOTAL MONETARY LOSS

We write to formally petition **PWAN HOMES**, a subsidiary of the PWAN GROUP, for fraudulent misrepresentation, non-allocation of land, and breach of contractual obligations regarding the purchase of property at **Flourish Estate, Imedu, Lagos State**.

Despite full payment of **₦1,730,000** made by our client in **2022** for the purchase of a plot of land within the aforementioned estate, PWAN HOMES has failed and refused to carry out physical allocation or issue the necessary documentation. This ongoing delay has caused significant financial loss and emotional distress.

DETAILED FACTS OF THE CASE

1. In or around **2022**, our client purchased a plot of land at **Flourish Estate, Imedu**, from PWAN HOMES after being promised prompt allocation and delivery of all relevant documents.
2. A total sum of **₦1,730,000** was paid to PWAN HOMES by our client via bank transfer into the company's designated account.
3. Since making the full payment, **no allocation has been conducted**, and **no document (Survey Plan, Deed of Assignment, or Allocation Letter)** has been issued to date.
4. Our client has made **repeated efforts** to follow up with the company through visits, calls, and messages, all of which have been met with false assurances, avoidance, and continued delay.
5. The facts strongly suggest **deliberate deceit, embezzlement of client funds**, and a systematic breach of trust by

PWAN HOMES and its agents.

APPLICABLE LEGAL BREACHES

The conduct of **PWAN HOMES** and its representatives constitutes violations of the following laws:

- **Advance Fee Fraud** – Section 419, Criminal Code Act.
- **Criminal Breach of Trust** – Section 312, Criminal Code Act.
- **False and Misleading Advertisement** – Section 14, FCCPA, 2019.
- **Breach of Contract** – Failure to allocate land and issue agreed legal documents.
- **Conspiracy to Defraud** – Section 516, Criminal Code Act.

RELIEFS SOUGHT


We hereby request the relevant law enforcement and regulatory agencies to:

1. **Commence urgent investigation** into the fraudulent activities of PWAN HOMES and its directors/agents.
2. **Compel the immediate allocation** of the client's land at **Flourish Estate, Imedu**, and issue all supporting documentation.
3. Alternatively, order a **full refund of ₦1,730,000** plus interest and appropriate compensation for the trauma and financial loss suffered.
4. **Prosecute the company and its responsible agents** under the relevant criminal laws.
5. **Blacklist PWAN HOMES** from further real estate activities until all pending allocations and refunds are resolved.

ATTACHED DOCUMENTS (EVIDENCE)

1. Proof of ₦1,730,000 payment to PWAN HOMES.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



ZENITH BANK PLC

4582578

COUNTER CHEQUE

Please tick as
Appropriate:

CASH WITHDRAWAL

☐

TRF TO ZENITH A/C

☒

TRF TO OTHER BANKS

☐

LOCAL MONEY TRF (LMT)

CASH

☐

MC

☐

MANAGER'S CHEQUE

Open

☐

Crossed

☐

OTHERS (Please Specify)

Date

D	D	M	M	Y	Y	Y	Y
1	1	2	0	2	2		

APPLICANT DETAILS — (DEBIT)

Account Name

[REDACTED]

Account Number

[REDACTED]

E-mail Address

Amount in Words:

[REDACTED]

Customer's Mobile Phone Number

[REDACTED]

Amount (N)

[REDACTED]

BENEFICIARY DETAILS — (CREDIT)

Name:

PURAN F LOURISH ISATES NETWORK LIA

1

Bank Name (Transfers Only)

Zenith Bank

Account
Number

1212035640

Amount (N)

1690000

Name:

2

Bank Name (Transfers Only)

Account
Number

Amount (N)

Name:

3

Bank Name (Transfers Only)

Account
Number

Amount (N)