# **ELUYEFA CHAMBERS**



No. 22 Admiralty Way, Lekki Phase 1

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 LAND AFTER PAYMENT OF \$\infty 2,000,000.00\$ (TWO MILLION NAIRA ONLY)

We write on behalf of our client (hereinafter referred to as —the alleged petitioner<sup>||</sup>) to formally petition **PWAN Group**, specifically its relevant subsidiary, for breach of contract and suspected fraudulent land transaction practices.

#### **FACTS OF THE CASE:**

- 1. The alleged petitioner entered into a land purchase agreement with PWAN Group and made full payment totaling approximately ₹2,000,000.00 for a plot of land, paid in **installments**.
- 2. Upon completion of payment, the petitioner made **repeated requests** for land allocation via calls and emails.
- 3. Rather than honoring the request, the company's representatives began **redirecting the petitioner from one contact person to another**, creating unnecessary delays and confusion.
- 4. Eventually, the company **ceased responding** altogether—**calls were ignored**, and **emails were never answered**.
- 5. To date, no land has been allocated, and no formal explanation or resolution has been provided.

### **APPLICABLE LEGAL BREACHES:**

The conduct of PWAN Group and its agents constitutes possible violations of Nigerian law, including:

- 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 under false pretences.
- 3. **Breach of contract and violation of the Consumer Protection Framework** Failure to deliver on paid obligations and provide fair service.

#### **RELIEFS SOUGHT:**

In light of the distress and financial loss suffered by the petitioner, we respectfully request that your office:

- 1. **Initiate a thorough investigation** into the conduct of PWAN Group and its agents.
- 2. **Prosecute all parties involved** for failure to allocate land after full payment and possible fraudulent misrepresentation.
- 3. Compel a full refund of ₹2,000,000.00 to the petitioner, with interest or, alternatively, ensure immediate and proper land allocation.
- 4. Implement **regulatory oversight** to protect future buyers from similar experiences.

## **ATTACHED DOCUMENTS:**

Installment payment receipts

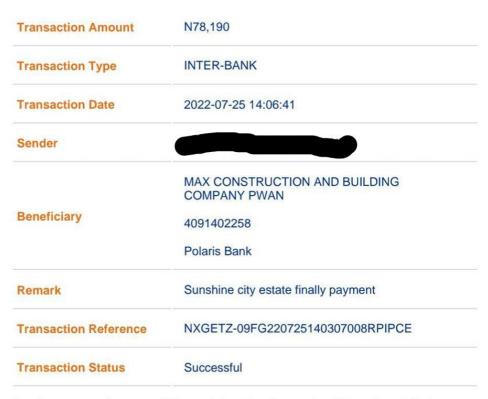
Yours faithfully,

AKINOLA SAMUEL ELUYEFA ESO

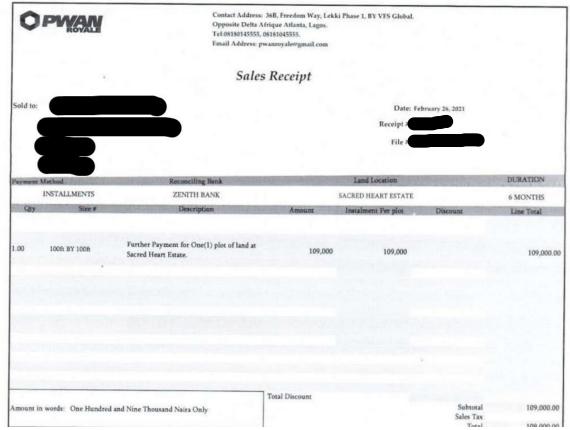
Principal Partner/Investor Partner

**ELUYEFA CHAMBERS** 

On behalf of the Alleged Petitioner



If you have any questions or would like more information, please call our 24-hour Contact Centre on 0700CallAccess 0700 3000000 +234 1-2712005-7 +234 1-2802500 or send an email to





OFFICE: Km42, lekki-Epe Expressway Opposite Children's Place Plaza, By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos Tel: +234-8180000652, +234-8180000637 Email: pwannasproperties@gmail.com



Date: Receipt #: File #:

Comment:



Payment Method	Reconciling Bank	Quantity	Estate	Duration
	ľ	-	Sunshine City	
			Umuwuagwu Isele,	
Outright	Polaris Bank Plc	1	Asaba	6Mths

Description Being Final payment for One(1)plot of Land at Sunshine City Umuwuagwu Isele, Asaba		Line Total	
		N 78,190.00	
Amount in words:	Seventy Eight Thousand One Hundred Ninety Naira and Zero Kobo	Subtotal Tax Total	N 78,190.00 N 0.00 N 78,190.00
Additional Informatio	n;	525 S2.	
Total Amount:	₦ 900,000.00		
<b>Outstanding Balance:</b>	N 0.00		
Size per Plot:	464Sqm		

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