



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](mailto: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](mailto:info@pwangroup.com), [pwanpronigeria@gmail.com](mailto:pwanpronigeria@gmail.com)

**PETITION AGAINST PWAN GROUP (DIAMOND ESTATE, IBEJU LEKKI, LAGOS STATE)  
FOR FRAUD, NON-ALLOCATION OF LAND, CRIMINAL BREACH OF TRUST, AND  
CONSPIRACY TO DEFRAUD – ₦14,000,000**

We act as solicitors to the Petitioner, hereinafter referred to as “**our client**”, and on their behalf lodge this formal complaint against **PWAN Group** and its agents responsible for the marketing and sale of plots at **Diamond Estate**, Ibeju Lekki, Lagos State.

## FACTUAL SUMMARY

1. In or around **2023**, our client purchased a plot of land priced at **₦14,000,000** at **Diamond Estate**, Ibeju Lekki, Lagos State.
2. Despite making substantial payments towards the total cost of the land, PWAN Group has failed, neglected, and refused to carry out any **physical allocation** of the said property.
3. Repeated requests for either a **valid allocation** or a **full refund** have been ignored by PWAN Group and its agents.

4. This deliberate inaction has caused our client severe financial hardship, loss of trust, and emotional distress.

### CRIMINAL OFFENCES DISCLOSED

The conduct of PWAN Group and its agents amounts to serious infractions under Nigerian law, including:

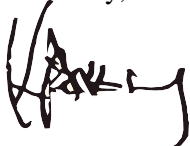
- **Obtaining by False Pretence and Advance Fee Fraud** – contrary to Section 1(1)(a) & (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006;
- **Criminal Breach of Trust** – contrary to Section 312 of the Criminal Code Act;
- **Conspiracy to Defraud** – contrary to Section 516 of the Criminal Code Act;
- **Fraudulent Concealment** – contrary to Section 14 of the FCCPA, 2019.

### PRAYERS

Given the above, we respectfully request that your office:

1. **Commence a thorough criminal investigation** into PWAN Group's dealings regarding Diamond Estate.
2. Prosecute all officers and agents involved in this fraudulent land sale scheme.
3. Recover and refund the full sum of **₦14,000,000** to our client without delay.
4. Award appropriate compensation for the hardship and losses suffered.
5. Take regulatory measures to stop the continued marketing of undeveloped or encumbered estates by PWAN and protect other buyers from similar exploitation.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the alleged petitioner*

## Sales Receipt

Sold To:

[REDACTED]

Date:

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	Duration
Installment	ZENITH BANK	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being final payment for 2.00 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 1,000,000.00	
Amount in words: One Million Naira and Zero Kobo Only	Subtotal	N 1,000,000.00
	Tax	N 0.00
	Total	N 1,000,000.00

### Additional Information

Total Amount: N 13,000,000.00

Outstanding Balance: N 0.00

Size per Plot: 600 Sqm

FOR PWAN Homes Ltd:



HEAD OFFICE: Floor 1 to 5 FURM Building, KM25, Lekki Epe Expressway, Opposite Lagos State University

(LASU), Ojo Ajo, Ajah, Lagos

INJEJA OFFICE: 16A Sule Abulka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos

Tel: +234-12356848, +234-14533609

Email: info@pwanhomes.com

## Sales Receipt

Sold To:

[REDACTED]

Date:

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 1,000,000.00	
Amount in words: One Million Naira and Zero Kobo Only	Subtotal	N 1,000,000.00
	Tax	N 0.00
	Total	N 1,000,000.00

Description	Line Total	
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 1,000,000.00	
Amount in words: One Million Naira and Zero Kobo Only	Subtotal	₦ 1,000,000.00
	Tax	₦ 0.00
	Total	₦ 1,000,000.00
Additional Information		
Total Amount: ₦ 13,000,000.00 Outstanding Balance: ₦ 8,700,000.00 Plot Size: 600 Sqm		

FOR PWAN Homes Ltd:
Okoh Lawrence
Signature


## Sales Receipt

Sold To:



Date:  
Receipt #:  
File #:  
Comment:



Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12Mths

Description	Line Total	
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 700,000.00	
Amount in words: Seven Hundred Thousand Naira and Zero Kobo Only	Subtotal	N 700,000.00
	Tax	N 0.00
	Total	N 700,000.00
Additional Information		
Total Amount: N 13,000,000.00		
Outstanding Balance: N 11,700,000.00		
Plot Size: 600 Sqm		

FOR PWAN Homes Ltd:
AKINLEYE SAMUEL
Signature





(Lagos), Oshodi, Ajayi, Lagos  
IKEJA OFFICE: 16A Sule Abulka Close, Off Opeti Road by GTB, Opeti, Ikeja, Lagos  
Tel: +234-12956848, +234-14533669  
Email: info@pwanhomes.com

## Sales Receipt

Sold To:

MRS MRS

Date:

Receipt #:

File #:

Comment:

File #

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Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	N 2,000,000.00	
Amount in words: Two Million Naira and Zero Kobo Only	Subtotal	N 2,000,000.00
	Tax	N 0.00
	Total	N 2,000,000.00

### Additional Information

Total Amount: N 13,000,000.00  
Outstanding Balance: N 9,700,000.00  
Plot Size: 600 Sqm







(LASU), Ojo Ado, Ajah, Lagos  
IKEJA OFFICE: 16A Sule Abuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos  
Tel: +234-12956848, +234-14533669  
Email: info@pwanhomes.com

## Sales Receipt

Sold To:

[REDACTED]

Date:

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	058152052 - Guaranty Trust Bank Plc	Hectares of Diamond 2	12Mths

Description	Line Total	
Being initial payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 200,000.00	
Amount in words: Two Hundred Thousand Naira and Zero Kobo Only	Subtotal	₦ 200,000.00
	Tax	₦ 0.00
	Total	₦ 200,000.00
Additional Information		
Total Amount: ₦ 13,000,000.00		
Outstanding Balance: ₦ 12,800,000.00		



# Sales Receipt

Sold To:

[REDACTED]

Date:

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 1,000,000.00	
Amount in words: One Million Naira and Zero Kobo Only	Subtotal	₦ 1,000,000.00
	Tax	₦ 0.00
	Total	₦ 1,000,000.00
Additional Information		
Total Amount: ₦ 13,000,000.00		
Outstanding Balance: ₦ 7,700,000.00		
Plot Size: 600 Sqm		

FOR PWAN Homes Ltd:

Okoh Lawrence



[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

The expected balance is N12, 800, 000 (Twelve Million, Eight Hundred Thousand Naira)

Orevaoghene Araka (Barr)  
FOR: PWAN Homes Ltd.

[www.pwanhomes.com](http://www.pwanhomes.com)



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 Abuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos  
Tel: +234-12956848, +234-14533669  
Email: info@pwanhomes.com

## Sales Receipt

Sold To:

[Redacted Signature]

Date:

Receipt #:

File #:

Comment:

[Redacted Date and Receipt/File Numbers]

Payment Method	Reconciling Bank	Estate	DURATION
Installment	057150013 - Zenith Bank Plc	Hectares of Diamond 2	12 Mths

Description	Line Total	
Being installment payment for 2 Plot(s) of [HOD 2] Land at Hectares of Diamond 2	₦ 700,000.00	
Amount in words: Seven Hundred Thousand Naira and Zero Kobo Only	Subtotal	₦ 700,000.00
	Tax	₦ 0.00
	Total	₦ 700,000.00
Additional Information		