



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 (PWAN HOMES) FOR FAILURE TO ALLOCATE LAND AFTER PAYMENT SINCE 2016

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally petition PWAN Group, specifically **PWAN HOMES**, for actions amounting to **fraud, breach of contract, and financial misconduct** concerning the purchase of land at *Tehila Gardens, Ibeju-Lekki, Lagos*, which has remained **unallocated for nearly a decade**.

FACTS OF THE CASE:

In 2016, the petitioner—then residing in the diaspora—was drawn to a promotional offer by **PWAN HOMES** advertising *Tehila Gardens* estate, purportedly near the Dangote Refinery in Ibeju-Lekki, Lagos State. The promotion included a “**Buy 2 plots, get 1 free**” deal.

Motivated by the desire to invest in Nigeria and in good faith, the petitioner made full payment totaling **₦3,000,000 (Three Million Naira)** for two plots of land at **₦1,500,000 each**, as advertised.

Despite assurances and promotional materials suggesting immediate or timely allocation, **no physical allocation** or possession of land has been granted to date.

Instead, the petitioner has endured **years of conflicting narratives, silence, and evasive responses** from PWAN staff, reflecting a deliberate attempt to avoid accountability.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN HOMES potentially violates the following:

- **Section 419 of the Criminal Code Act** – *Obtaining money or property under false pretences.*
- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – *Criminal breach of trust.*
- **Federal Competition and Consumer Protection Act (FCCPA)** – *Violation of consumer rights relating to fair dealing, honest advertising, and fulfillment of paid services.*

RELIEFS SOUGHT:


We humbly request that your esteemed office:

1. **Launch a formal investigation** into PWAN HOMES for fraudulent land schemes and willful non-allocation despite payment.
2. **Prosecute responsible officers** and corporate representatives for breach of trust, contract, and financial deception.
3. **Compel PWAN HOMES** to either:
 - Allocate the land originally purchased, **or**
 - Issue a **full monetary refund with applicable interest** for lost time and investment potential.
4. Enforce regulatory measures to **prevent further exploitation** of unsuspecting Nigerians, both home and abroad.

ATTACHED DOCUMENTS:

- Proof of payment (₦3,000,000)
- Promotional materials referencing Tehila Gardens and the “Buy 2 Get 1 Free” offer
- Any relevant correspondences and follow-ups sent to PWAN HOMES

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

15:26

5G



CORPORATE HEAD OFFICE
Floor 1 to 5 FURE MASJ BUILDING KM 25, Lekki Expressway Opposite Farmer
Lagos State University (LASU), Oshodi Area, Lagos State.
Telephone: +234-1-2956888
Email: info@pwanhomes.com : pwanlimited@gmail.com
Complaints: customercare@pwanhomes.com

REGIONAL OFFICE
No 15A, Sule Abaka Close Off Opebi Road, by GTBANK, Opebi Ikeja, Lagos
Telephone: +234-1-2957206

DATE: 26-01-2018

Dear Valued Client,

TEHILLA GARDENS, LAGOS ESTATE ALLOCATION UPDATE.

We will like to appreciate your patience and understanding on the issues the company incurred on the purchase of Tehilla Gardens Lagos.

We are here to tell you that there is some good news, as the company has been able to secure a large portion of the land purchased and we are ready to allocate after intensive and visible work done on the estate since the issue was resolved.

Physical allocation starts on Tuesday 13th February, 2018 and your scheduled date for your physical allocation will be communicated to you in due course.

Please do ensure that seventy thousand naira (70,000) payment for your plot demarcation is made before your allocation date, for there will be no physical allocation without payment for plot demarcation.

Most regards for your more anticipated corporations.

For inquiries please call: 09099999762



- Real Estate & Property Development
- Consultancy
- Land Survey
- Logistics

TEHILLA GARDENS SUBSCRIPTION FORM

Title: Miss
Surname: [REDACTED]
Other Names: [REDACTED]
Sex: FEMALE
Marital Status: SINGLE
Name of Spouse: N-A
Tel. No: [REDACTED] E-mail: [REDACTED]
Postal Address: [REDACTED]
Residential Address: [REDACTED]
Occupation: REALTOR
Employer's Name/Address: N-A
Next of Kin
Name: [REDACTED]
Address: [REDACTED] Tel: (+44) [REDACTED] 1308
Type of Plots: ☐ Residential ☐ Commercial
Number of Plots: 2

Payment Options: ☒ Full ☐ 18 Months

I Johnson Idena hereby affirm that all information provided as a requirement for the allocation of land in Tehilla Gardens Phase 1 at Free Trade Zone Area in Ibeju-Lekki Local Government Area, Lagos State is true and any false or inaccurate information given by me may result in the decline of my application.

Signature: [REDACTED] Date: 10/feb/2016

Referred by: [REDACTED] Date: 10/feb/2016
Referrer Phone No: [REDACTED]
Action by: [REDACTED] Date: [REDACTED]
Total Cost: [REDACTED] Due Date: [REDACTED]

Contact Address: No 6 Ogbeni Street, Thera Annex, beside Conoil Filling Station by Golden Park Estate, Ogidan, Sangotedo, Lekki Peninsula - Lagos. 08029595951. Email Address: pwanltd@yahoo.com

TEHILLA GARDEN SURVEY

