



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 LIMITED FOR FAILURE TO ALLOCATE AND RELEASE POSSESSION OF ONE (1) RESIDENTIAL PLOT AT TEHILLA GARDENS PHASE 1, FULLY PAID FOR AND DEMARCATED SINCE 2016

We write on behalf of our client (hereinafter referred to as “**the Petitioner**”) to formally lodge this petition against **PWAN Homes Limited** for **breach of contract, fraudulent misrepresentation, and deliberate refusal to grant possession of one (1) residential plot of land** fully paid for and demarcated at **Tehilla Gardens Phase 1**, acquired since 2016.

FACTUAL SUMMARY

1. In **2016**, the Petitioner purchased **one (1) residential plot of land** in **Tehilla Gardens Phase 1**, under the marketing and sales scheme of **PWAN Homes Limited**.
2. The Petitioner paid the full purchase price for the plot, as well as additional statutory charges, as required by PWAN Homes Limited.
3. In or around **2018**, the Petitioner was further asked to pay a **demarcation fee** to enable physical allocation — this fee was paid in full.
4. PWAN Homes Limited then arranged a site visit and physically showed the Petitioner the specific portion allocated, marked as **BLOCK A5, PLOT 11** within Tehilla Gardens Phase 1.
5. Since that visit, the Petitioner has **received no meaningful updates**, despite multiple follow-ups confirming readiness to take possession and begin development.
6. PWAN Homes Limited has repeatedly given shifting excuses, with no credible explanation as to why the Petitioner cannot take physical possession of the demarcated plot.

7. To date, the Petitioner still holds the original **hard copy of the Contract of Sale** but remains without physical access to the land or any evidence of proper title transfer beyond the demarcation.
8. This prolonged refusal to release possession has caused the Petitioner **financial loss, development delays, wasted time, and serious emotional distress.**

ALLEGED OFFENSES

The conduct of **PWAN Homes Limited** constitutes the following offenses under Nigerian law:

- **Breach of Contract** — for failing to grant possession despite full payment and demarcation;
- **Obtaining Money Under False Pretences** — contrary to **Section 419 of the Criminal Code Act**;
- **Criminal Breach of Trust** — contrary to **Section 312 of the Criminal Code Act, Cap C38, LFN 2004**;
- **Conspiracy to Defraud** — contrary to **Section 516 of the Criminal Code Act**;
- **Unfair Business Practices and Misrepresentation** — in violation of the **Federal Competition and Consumer Protection Act (FCCPA), 2019**;
- **Advance Fee Fraud** — contrary to the **Advance Fee Fraud and Other Fraud Related Offences Act, 2006**.

RELIEFS SOUGHT

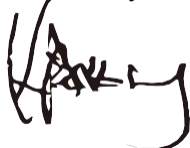
In view of the above, we respectfully request that your esteemed office:

1. Conduct a **full investigation** into **PWAN Homes Limited**, its directors, managers, and field agents involved in the sale and marketing of **Tehilla Gardens Phase 1**.
2. Compel PWAN Homes Limited to **immediately grant physical possession** and full title documentation for **BLOCK A5, PLOT 11**, to enable the Petitioner to commence development without further delay.
3. In the alternative, order a **full refund** of the total sums paid, including the demarcation fee, with accrued interest and compensation for wasted time and development losses.
4. Prosecute any individuals found to have deliberately obstructed possession or engaged in fraudulent misrepresentation.
5. Recommend stronger regulatory oversight to protect other land buyers from similar exploitation.

ATTACHED DOCUMENTS

- Original **Contract of Sale**;

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

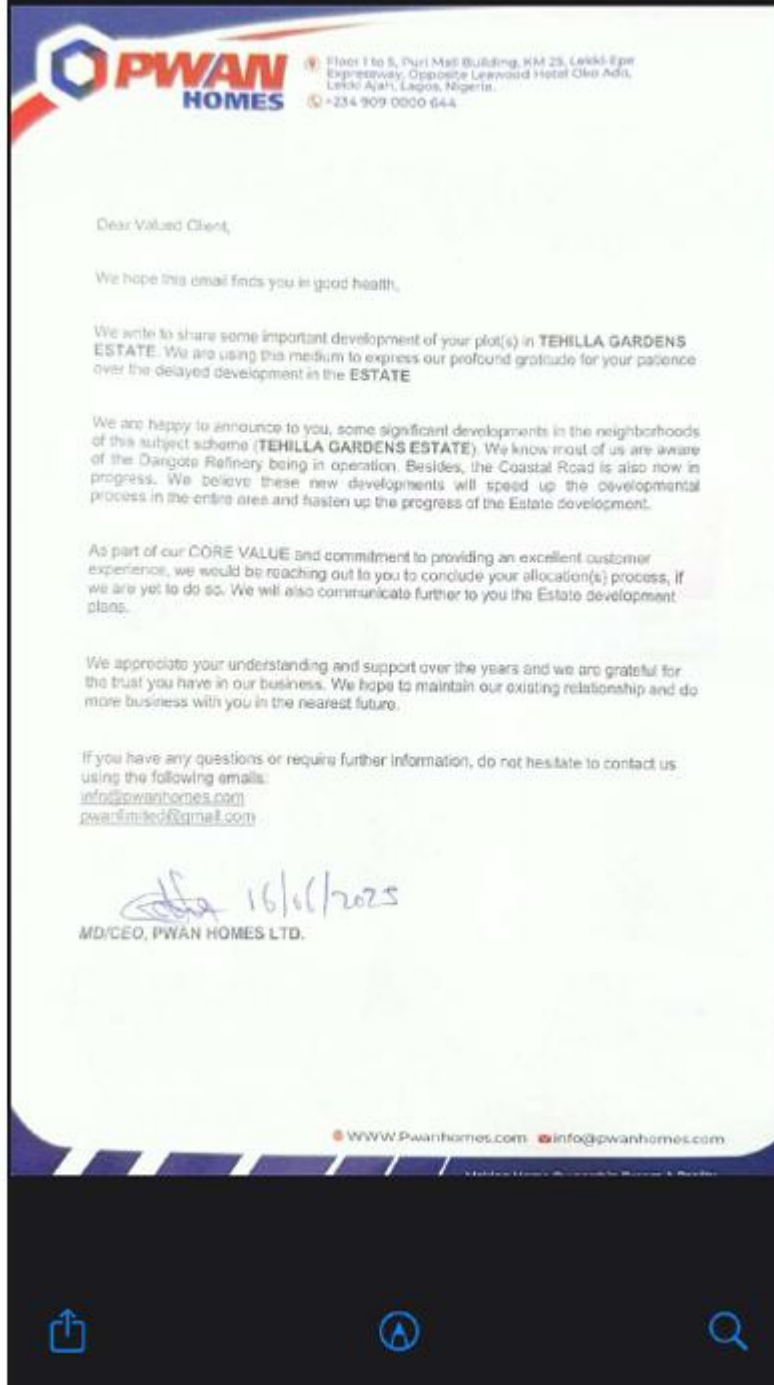
On behalf of the Alleged Petitioner

8:21



PWAN (1).pdf

Done





HEAD OFFICE: No 6 Ogbeni Street, THIERA ANNEX, off Lekki-Epe Expressway
by Conoil Filling Station, beside Golden Park Estate, Ogldan, Ajah, Lekki, Lagos.
Tel: +234 1 2956848

IKERJA OFFICE: 15A Sule Abuka Close off Opebi Road by GTB, Opebi, Ikeja, Lagos.
Tel: +234 1 2957206. Emails: pwanltd@yahoo.com, info@pwanhomes.com

August 24, 2017.

Dear esteemed client,

TEHILLA GARDENS ESTATE ALLOCATION UPDATE

Our last correspondence dated **June 6, 2017** in respect to the above subject matter refers.

We are glad to inform you that the crisis amongst the family members at **TEHILLA GARDENS** which hindered the physical allocation in the estate has been resolved.

In view of this, the necessary pre-allocation formalities will continue. Clearing works and mapping out of more plots in preparation for physical allocation is also in the pipeline as well as perimeter fencing.

You will be updated further on your respective allocation dates before the exercise commences or on any other information that pertains to this estate.

We hope that the whole exercise will be completed before the end of the year 2017.

We appreciate your understanding thus far.

Thank you for choosing **PWAN HOMES LIMITED**.

Yours Sincerely,

For: **PWAN HOMES LTD**

 24/8/17
Signed: **MANAGEMENT.**

30th September 2016

Dear Esteemed Client,

ALLOCATION STATUS OF TEHILLA GARDENS

We wish to appreciate you once again for investing in our estate (Tehilla Gardens). By way of update, clearing has been concluded at the estate. Currently, we are clearing all the stacks in the estate after which it will be mapped out for eventual allocation.

You will be communicated on your allocation date as soon as we are through with these formalities.

Thank you for choosing PWAN Homes Ltd.



Signed MANAGEMENT



...making home ownership dreams a reality

www.pwanhomes.com



HEAD OFFICE Floor 1 to 5 Puri Mill Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo Aja, Lagos
IKERJA OFFICE 15A, Sule Abacha Close, Off Opebi Road by GTE, Opebi, Ikeja, Lagos
Tel: +234-12956948, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[REDACTED]
[REDACTED] E WAY,

Date:

Receipt:

File #:

Comment:

Payment Method	Reconciling Bank	Estate	DURATION
Outright	063150162 - Diamond Bank Plc	Tehilla Gardens Phase 1	

Description	Line Total	
Being full payment for 1 Unit(s) of [PD] Plot Demarcation	N 70,000.00	
Amount in words: Seventy Thousand Naira and Zero Kobo Only	Subtotal	N 70,000.00
	Tax	N 0.00
	Total	N 70,000.00

Additional Information

Total Amount: N 70,000.00
Outstanding Balance: N 0.00
Plot Size: 600 Sqm

FOR PWAN Homes Ltd:

Okoh Lawrence

Signature





CORPORATE HEAD OFFICE
Floor 1 to 5 PURI MALL BUILDING KM 25, Lekki Expressway Opposite Former
Lagos State University (LASU), Ojo, Lagos State.
Telephone: +234-12957206
E-mail: info@pwanhomes.com : pwanhomes@gmail.com
Complaints: customercare@pwanhomes.com

IKERAJA OFFICE
No 16A, Ibe Abiola Close Off Opebi Road, by GTBANK, Opebi Ikaja, Lagos
Telephone: +234-12957206

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.

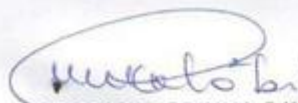
Physical allocation starts on Tuesday 13th February, 2018 and your scheduled date for your physical allocation will be communicated to you in due course.

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

Yours Faithfully


NWOKOLO OBINNA C.K

FOR: MANAGEMENT.

26/1/18