



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 MAX FOR FAILURE TO DELIVER FULL POSSESSION AND DOCUMENTATION OF ONE (1) RESIDENTIAL PLOT FULLY PAID FOR SINCE 2020

We write on behalf of our client (hereinafter referred to as “**the Petitioner**”) to formally petition **PWAN Max**, a subsidiary under **PWAN Group**, for **breach of contract, incomplete allocation, and lack of proper handover** in respect of **one (1) residential plot of land** fully paid for since 2020.

FACTUAL SUMMARY

1. In **2020**, the Petitioner purchased **one (1) residential plot of land** from **PWAN Max**, paying the total cost of **₦1,500,000 (One Million, Five Hundred Thousand Naira Only)** in two instalments of **₦750,000** each.
2. In **2022**, the Petitioner also made additional payments for **allocation and survey fees** to complete the statutory requirements for physical possession.
3. Because the Petitioner was not physically present in Nigeria at the time, his sister handled the payment and attended the allocation exercise on his behalf.
4. The Petitioner was informed that the plot had been allocated, but to date, he has **not received valid final documentation**, nor has he been able to take full possession and secure the plot with fencing or development due to **financial constraints and lack of verified access**.
5. Despite repeated efforts, the Petitioner has **not received clear confirmation of valid title**, nor any assistance from PWAN Max to fully secure the plot.
6. The Petitioner’s plan to build a fence and personally inspect the plot was postponed due to limited funds, but the expectation remains that PWAN Max should deliver proper

documentation, verified access, and clear boundaries to allow the Petitioner to develop the land without further risk.

ALLEGED ISSUES

The conduct of **PWAN Max** raises the following breaches:


- **Incomplete Handover** — despite full payment and additional statutory fees, the Petitioner has not received full valid documents to guarantee secure ownership.
- **Potential Misrepresentation** — failure to provide final title documents and full support for fencing and physical possession.
- **Breach of Contract** — contrary to the clear terms of sale and allocation.
- **Unfair Trade Practices** — contrary to the **Federal Competition and Consumer Protection Act (FCCPA), 2019**).

RELIEFS SOUGHT

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

1. Investigate **PWAN Max**, its directors and officers responsible for the sale and allocation of the Petitioner's plot.
2. Compel PWAN Max to **immediately deliver all final valid title documents** and provide full support to secure the land for fencing and development.
3. Confirm that the allocated plot is genuine, properly excised (if applicable), and not under government acquisition.
4. In the alternative, refund all sums paid — including the original purchase price, allocation fee, and survey fee — with interest, should the land be found unsuitable or unverified.
5. Sanction any persons found to have misrepresented the plot's status or delayed the Petitioner's ability to secure the land.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

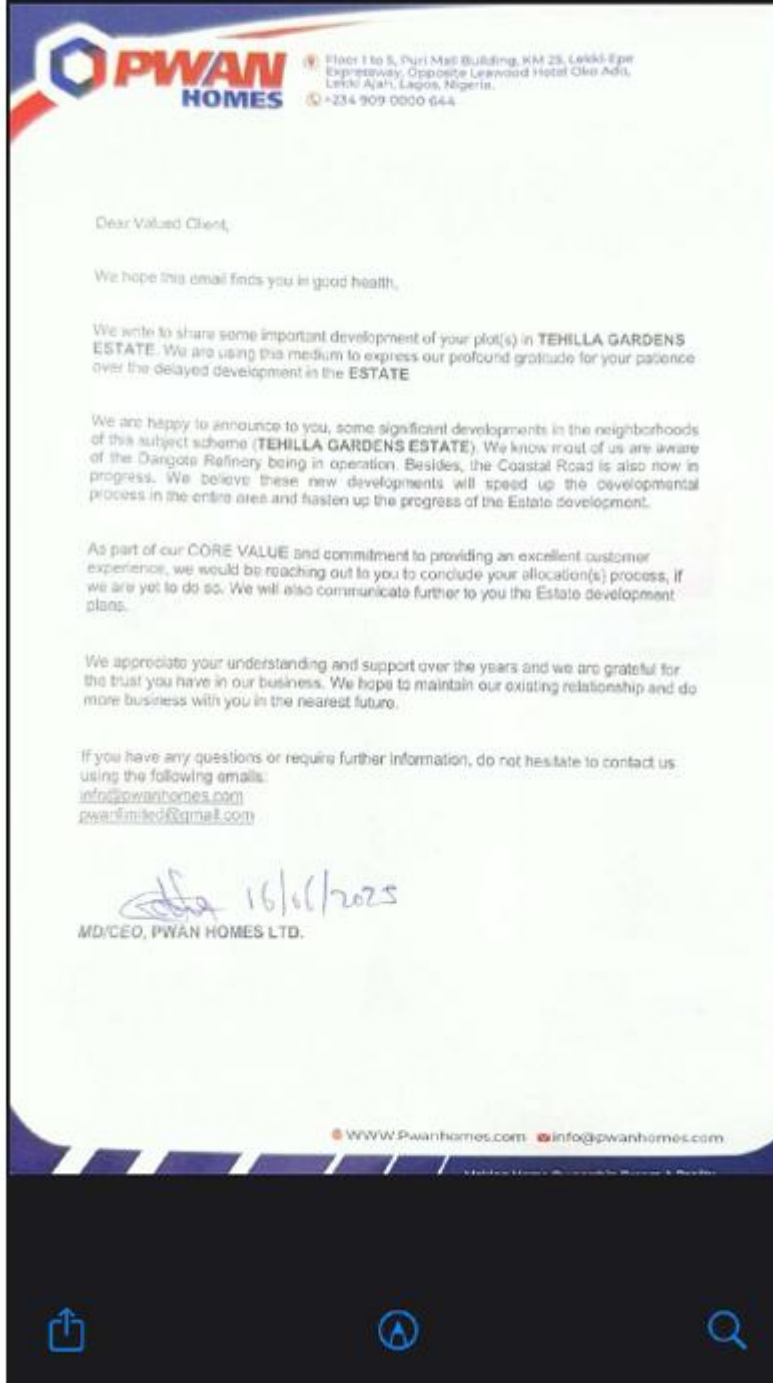
On behalf of the Alleged Petitioner

8:21



PWAN (1).pdf

Done





HEAD OFFICE: No 6 Ogbeni Street, THIRA 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 Aja, Lagos State.
Telephone: +234-12957206
E-mail: info@pwanhomes.com : pwanhomes@gmail.com
Complaints: customercare@pwanhomes.com

IKERJA OFFICE
No 16A, Ibe Abaka 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.

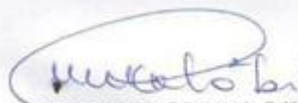
Physical allocation starts on Tuesday 13th February, 2018 and your scheduled date for your physical allocation will be communicated to you in due course.

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