



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 LTD FOR FAILURE TO ALLOCATE FOUR (4) PLOTS OF LAND FULLY PAID FOR SINCE 2013 TO 2021 – TOTAL AMOUNT ₦3,300,000

We write to formally lodge a complaint against PWAN Homes Ltd for persistent breach of contract and fraudulent delay in the physical allocation of four (4) plots of land fully paid for by the complainant between 2013 and 2021.

FACTS OF THE CASE:

- **2013:** One (1) plot of land was purchased at *PHPAC*, Elerangbe, Epe, Lagos State for the sum of **₦300,000**. The buyer was issued a **Deed of Assignment** and an **Allocation Document**, but **no physical allocation or possession** has occurred to date.
- **2020:** Two (2) plots of land were purchased at *Immaculate Heart Gardens*, Omagwa, Port Harcourt for the sum of **₦2,400,000**. The buyer received **Contracts of Sale and Allocation Documents**, but again **no physical allocation or possession** was made.
- **2021:** One (1) plot was purchased at *Orange Pavilion*, Ikorodu, Lagos State, for **₦600,000**. A **Contract of Sale** was issued, but **no allocation document** or physical possession has been given.

- The buyer has repeatedly reached out to PWAN Homes Ltd, including personal messages and appeals to **Dr. Augustine Onwumere**, the owner and principal officer of PWAN Homes Ltd, since as early as **2016**.
- Responses from PWAN Homes Ltd and its management have included **delaying excuses**, such as “allocation is done in batches,” “rainy season issues,” and other vague justifications that have spanned **over a decade**.
- As of **2025**, no single one of these four plots has been physically allocated to the buyer despite full payment and supporting documentation.

ALLEGED OFFENSES:

The conduct of PWAN Homes Ltd in this case constitutes the following:

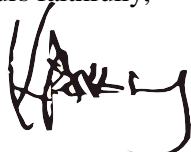
- **Breach of Contract** – Full payment was made for all four plots, yet no physical allocation has taken place over several years.
- **Fraudulent Misrepresentation** – The company issued allocation documents and sales contracts as if to suggest imminent allocation, which never occurred.
- **Deception and Obtaining Money Under False Pretenses** – The failure to deliver land over 10+ years after collecting money shows calculated deceit.
- **Negligence and Unethical Business Practice** – PWAN Homes Ltd failed to adhere to its own terms and failed to respond adequately to customer complaints.
- **Violation of Consumer Rights** – This prolonged non-delivery and misrepresentation contravenes provisions under the Federal Competition and Consumer Protection Act (FCCPA).

RELIEFS SOUGHT:

We respectfully request that your office:

1. **Conduct a thorough investigation** into PWAN Homes Ltd, its officers, and its estate projects, especially PHPAC (Elerangbe), Immaculate Heart Gardens (Port Harcourt), and Orange Pavilion (Ikorodu).
2. **Compel the immediate physical allocation** of the four plots of land fully paid for between 2013 and 2021.
3. In the alternative, **mandate a full refund of ₦3,300,000**, plus accrued interest and compensation for emotional and financial hardship over the years.
4. **Sanction or prosecute** any responsible officers of PWAN Homes Ltd for fraudulent practices and persistent breach of trust.
5. Take regulatory action to **protect land investors and buyers** from ongoing deception and exploitation in the Nigerian real estate sector.

Yours faithfully,





AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

		<ul style="list-style-type: none">Real Estate & Property DevelopmentConsultancyLand SurveyLogistics			
<i>Sales Receipt</i>					
Sold to: [REDACTED]		Date:	November 12, 2013		
		Receipt #:	2016/PHPAC/001		
		File #:	PH/PHPAC 1/2013/158		
Payment Method	Reconciling Bank	Land Location			
OUTRIGHT	GTB	PHPAC 1 Estate			
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	675 Sqm	Full Payment for One (1) plot of land at PHPAC 1 Estate.	300,000.00		300,000.00
Amount in words: Three Hundred Thousand Naira Only			Total Discount	Subtotal	300,000.00
				Sales Tax	
				Total	300,000.00
FOR PWAN HOMES LTD:		Signature			
Received By:		Signature			
Contact Address: 6, Ogbeni Street, By Golden Park Estate, Ogidan Sangotedo, Ajah – Lagos. 08029595951.					



Plot 1 - 3 Plot Mat Building, Km 25, Linka Epe Expressway
Opposite Leeward Hotel (Gore Court)
Off Aden, Ape, Lagos State
(P) +234-1-2956848, 234-14334177, 234-14333664

DATE: 26TH FEBRUARY, 2020
FILE #: P101GE/2017/0000464

Dear Valued Client,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: IMMACULATE GARDENS ESTATE PH
No of Plots: 2 PLOTS (RESIDENTIAL)
Plot Details: BLOCK 1 PLOT 10, 12
Plot Size: 464 SQMS
Date of Allocation: 8TH APRIL, 2021

NE: This letter is temporary pending the receipt of your survey plan.
Subsequently, you are responsible for the clearing of your land after allocation.

Thanking you for choosing PWAN HOMES LIMITED.

Yours faithfully,

BONIFACE EBOH
ADMIN OFFICER

DR. JULIUS OYEDEMI
MD/CEO

pwahomes@gmail.com | www.pwahomes.com

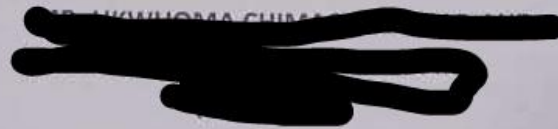
...making home ownership dreams a reality.

DEED OF ASSIGNMENT

BETWEEN

PWAN HOMES LIMITED
(ASSIGNOR)

AND



IN RESPECT OF ALL THAT PARCEL OF LAND KNOWN AS BLOCK A43, PLOT 15 IN PHPAC ESTATE,
SITUATE AT MAYUNRE VILLAGE, ELERANIGBE AREA OF IBEJU-LEKKI/EPE LOCAL GOVERNMENT
AREA OF LAGOS STATE.



PREPARED BY:

EMMANUEL NDUBUISI, ESQ.
C/O THE LAW FIRM OF OLUKAYODE A. AKOMOLAFE
2, OLUFUNMILOLA OKIKIOLU STREET,
OFF TOYIN STREET,
IKEJA,
LAGOS



HEAD OFFICE: No 6 Ogbeni Street, THERA ANNEX, off Lekki-Expressway-Epe, by Conoil Filling Station, beside Golden Park Estate, Ogidan, Ajah, Lekki, Lagos. Tel: +234 1 2956848
IKEJA OFFICE: 16A Sule Abuka Close off Opebi Road by GTB, Opebi, Ikeja, Lagos. Tel: +234 1 2957206. Emails: pwanltd@yahoo.com, info@pwanhomes.com.

9th September, 2016

[REDACTED]

Dear Sir/Ma,

ALLOCATION NOTIFICATION LETTER FOR ONE PLOT OF LAND AT PHPAC PHASE 1 ESTATE, ELERANIGBE AREA, EPE LGA

We write to notify you that One (1) plot of land shall be allocated to you at Phpac Phase 1 Estate, Eleranigbe, Epe Local Government Area of Lagos State.

Please find below the description of the allocation:

LOCATION: Eleranigbe Area, Ibeju Lekki Area of Lagos State.

SIZE: One (1) plot of Undeveloped land measuring 675sqm.

TITLE: Undeveloped parcel of Land presently going through the process of excision at the Ministry of lands, Alausa, Lagos State.

You are required to make the following payments before your allocation:

1. **Provisional Survey Plan Fee:** To pay the sum of ₦50,000 only per plot, being the payment for your Provisional Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of ₦20,000 only per plot for your plot demarcation (4 Corner Piece).
3. **Clearing:** To pay the sum of ₦30,000 only per plot for the Clearing of your land.
4. **Deed of Assignment Fee:** We would kindly advice you on the cost for the production of your Deed of Assignment at a later date.

Payment shall be made into any **Diamond Bank** branch. Account Name: **Folkland Property Development Company**, Account Number: **0035628388**.

Your provisional Survey Copies containing full details of your plot shall be made available to you after your physical allocation.

Thank you so very much for partnering with us to make home ownership dreams a reality for as many people as we possibly can.

Sincerely, 



mlm_customer_...



HEAD OFFICE: Floor 1 to 5 P/R Mill Building, KM 25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo, Lagos
IKEJA OFFICE: 16A, Sule Azuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234-12956848, +234-14533609
Email: info@pwanhomes.com

Sales Receipt

Sold To:

[REDACTED]
*+917643660075

Date:

Jan 13, 2021

Receipt #:

ABN/2021/1984

File #:

PH/OPAE/2021/00087

Comment:

Payment Method	Reconciling Bank	Estate	Duration
Installment	044150149 - Access Bank Plc	Orange Pavilion Estate	12 Mths

Description	Line Total	
Being initial payment for 1.00 Plot(s) of [OPAE] Orange Pavilion Estate	N 55,000.00	
Amount in words: Fifty-Five Thousand Naira and Zero Kobo Only	Subtotal	N 55,000.00
	Tax	N 0.00
	Total	N 55,000.00

Additional Information

Total Amount: N 660,000.00
Outstanding Balance: N 605,000.00
Size per Plot: 600 sqm

FOR PWAN Homes Ltd:

Nneke Gideon

Signature

CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD

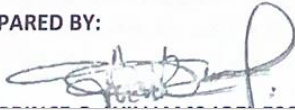
(THE VENDOR)

AND

(THE PURCHASER)

IN RESPECT OF ONE (1) PLOT OF LAND AT ORANGE PAVILION ESTATE SITUATE ODELEMO TOWN VIA AGBOWA, IKORODU, LAGOS STATE

PREPARED BY:



BETWEEN

PWAN HOMES LTD a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its Head Office at Puri Mall Building, Floor 1-5, KM 25, Lekki-Epe Expressway, Opposite LASU, Sangotedo, Lekki, Lagos State (hereinafter referred to as **'THE VENDOR'** which expression shall wherever the context so admits include its assigns, legal representatives and successors-in-title) of the one part.

AND

~~_____~~ (hereinafter referred to as 'THE PURCHASER' which expression shall wherever the context so admits include his heirs, assigns and legal representatives) of the other part.

WHEREAS:

1. The Vendor is a real estate Marketing and Investment Company engaged in the acquisition of tracts of land and development of estates which is laid out into schemes and gated estates and are thereafter allocated to Subscribers to the Schemes.
2. The Vendor has acquired a vast tract of land measuring **600 square meters each** situate and described as ORANGE PAVILION ESTATE.
3. The Vendor with intent to achieve its object of development of Schemes has procured ORANGE PAVILION ESTATE hereinafter referred as 'the Scheme', whereby interested person (s) or organization subscribes to the Scheme by way of monthly, quarterly contribution or outright payment towards ownership of plot(s) of land within the Scheme.

IT IS HEREBY AGREED that the purchaser has fully subscribed to **One (1) Plot** of land (measuring **648 square meters**) and the Vendor shall allocate same within the Scheme to the purchaser under the following terms and conditions:

6. The Vendor shall from time to time make rules and regulations or issue directives towards the realization of the functionality of the Scheme.

4. THE VENDOR COVENANT WITH THE PURCHASER as follows:

1. To allocate **One (1) Plot** of Land to the purchaser at the time of allocation in ORANGE PAVILION ESTATE situate at Odelemono Town via Agbowo, Ikorodu, Lagos State.
2. To refund to the purchaser the total money paid less 10% administrative charges and 30% agency fee, if the purchaser is no longer interested in the scheme at any time before taking full possession.
3. The Vendor hereby indemnifies the purchaser against loss (es) or adverse claim over the said **One (1) Plot** allocated to the purchaser within the Scheme.

5. THE PURCHASER HEREBY COVENANTS WITH THE VENDOR as follows:

- a. To pay for their Survey and legal fees in respect of the **One (1) Plot** of land.
- b. If the purchaser wishes to withdraw from this scheme at any time before taking full possession:
 - i. To give a notice of 90 days, and 60 days thereafter if the refund is not ready at the expiration of the 1st notice.
 - ii. An administrative charge of 10% and 30% Agency fee shall be deducted

6. IT IS HEREBY FURTHER agreed that:

- a. The Purchaser has been briefed and is fully aware of the status of the land and has agreed to purchase the land as it is.
- b. Both parties covenant to uphold these presents.

IN WITNESS WHEREOF, the Parties have hereto set their hand and seal this day and year first above written.