



**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 HOMES LTD FOR FAILURE TO DELIVER LAND ALLOCATION AT PALMS RESIDENCE ESTATE, ABUJA – TOTAL AMOUNT ₦18,000,000**

We write to formally lodge a petition against **PWAN Homes Ltd** for **breach of contract, fraudulent misrepresentation, and failure to reallocate land** at **Palms Residence Estate, Abuja**, after the original site was taken over by the government.

### **FACTS OF THE CASE:**

- In **January 2022**, PWAN Homes Ltd began marketing and selling plots of land at **Palms Residence Estate**, located in **Abuja, FCT**.
- The petitioner made a substantial payment of **₦15,000,000 (Fifteen Million Naira)** directly to the company's official bank account (evidence attached).
- The **total cost** of one plot in the estate was **₦18,000,000 (Eighteen Million Naira)**, and the petitioner has paid **more than other co-buyers**, including one **Margaret**, who is still paying in installments.
- Barely **six months** after the sales began, the land was **allegedly taken over by the government**, thereby rendering the transaction void and the land unavailable.
- The company, through its representative, promised to **reallocate another plot by December 2023**, but this has not been fulfilled to date.

- Numerous **calls placed to the Managing Director** and other company representatives have gone unanswered.
- Visits to the **PWAN Homes Abuja office** have been unproductive, as the office is often **vacant or non-functional**.
- As of today, there has been **no land, no reallocation, no refund, and no communication** from the company.

## **ALLEGED OFFENSES:**

The actions of PWAN Homes Ltd amount to:

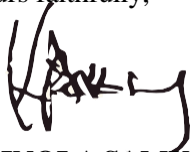
- **Breach of Contract** – Full or substantial payment was made without the promised land allocation.
- **Fraudulent Misrepresentation** – The company advertised and sold land that was either under government acquisition or without proper title.
- **Obtaining Money by False Pretenses** – This violates **Sections 419 and 323 of the Nigerian Criminal Code** and may also constitute **criminal breach of trust**.
- **Negligence and Unethical Business Practice** – Failure to provide timely updates, alternatives, or refunds after government acquisition.
- **Violation of Consumer Rights** – Under the **Federal Competition and Consumer Protection Act**, this constitutes unfair treatment, deception, and non-fulfillment of service obligations.

## **RELIEFS SOUGHT:**

We respectfully urge your office to:

1. **Launch a full investigation** into PWAN Homes Ltd and the transactions involving Palms Residence Estate, Abuja.
2. **Compel the immediate reallocation** of a valid, government-approved plot of land within a similar location or estate.
3. In the alternative, **mandate a full refund of ₦18,000,000**, plus **interest and damages** for the prolonged delay, emotional trauma, and financial hardship caused.
4. **Prosecute or penalize** any corporate officers found to have knowingly deceived or misled buyers.
5. Implement **consumer protection and real estate regulations** that prevent further victimization of land buyers in Abuja and beyond.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

**THE PALMS RESIDENCES ABUJA-FCT | SUBSCRIPTION FORM**

**SECTION 1: SUBSCRIBER'S DETAILS**

Please complete all fields in block letters. Fields marked with asterisks (\*) are mandatory. Tick boxes where appropriate.

NAME\* [REDACTED]  
Mr ☒ Mrs ☐ Miss ☐ Other ☐

NAME OF SPOUSE\* [REDACTED]  
(If Applicable)

ADDRESS [REDACTED]

DATE OF BIRTH\* 02/10/2000 GENDER\* MALE ☒ FEMALE ☐

MARITAL STATUS\* MARRIED NATIONALITY\* NIGERIAN

OCCUPATION [REDACTED] EMPLOYER'S NAME [REDACTED]

COUNTRY OF RESIDENCE NIGERIA LANGUAGE SPOKEN ENGLISH

EMAIL ADDRESS\* [REDACTED]@HOTMAIL.COM

TELEPHONE NUMBER\* [REDACTED] MOBILE NUMBER\* [REDACTED]

**SECTION 2: NEXT OF KIN**

NAME [REDACTED] ADDRESS PLOT 1223 TRANS  
PHONE NUMBER 08022867273 [REDACTED]  
EMAIL ADDRESS [REDACTED] ABUJA

**SECTION 3: SUBSCRIBER'S DECLARATION**

I, [REDACTED], hereby affirm that all information provided as a requirement for the purchase of [REDACTED] in the Palms Residences Located in Lugbe Opposite Shoprite E.C.T Abuja, is true and any false or inaccurate information given by me may result in the decline of my application.

\*TYPE OF PLOT: ☒ Residential ☐ Commercial plot (attracts 10%) Number of plots 11 PLOT SIZE: 450 SQM

PAYMENT PLAN: ☐ 3 Months ☒ 12 Months ☐ Corner piece plot(s) attracts 10% of land cost

SIGNATURE OF SUBSCRIBER\* [REDACTED]

NAME\* OBUZUNYA J.P. DATE\* 31/01/2022

**FOR REFERRAL DETAILS**

NAME\* [REDACTED] H N D I D I

DATE\* 31/01/2022

PHONE NO [REDACTED]

EMAIL [REDACTED]@HOTMAIL.COM

ADDRESS: PWAN MAX ABUJA OFFICE  
2 AGADEZ STREET OFF AMINU KANO CRESCENT, WUSE 2, ABUJA.  
EMAIL: info@pwanmax.com WEBSITE: www.pwanmax.com

ALL PAYMENTS SHOULD BE MADE IN FAVOUR OF:  
PWAN MAX PROPERTY AND BUSINESS SOLUTIONS  
4011420133

### THE PALMS RESIDENCES ABUJA-FCT FREQUENTLY ASKED QUESTIONS/ TERMS AND CONDITIONS OF PURCHASE

THE PALMS RESIDENCES ESTATE is a unique Product from the staple of PWAN MAX where we want each and every subscriber to bear in Mind that from the Point of Purchase, they are meant to start planning for Building within 90 Days of Payment completion. PWAN MAX reserves the right to Allocate and Reallocate your Plots based on readiness to Build because we want a very fast development at THE PALM RESIDENCES. See below the terms and condition of THE PALM RESIDENCES before Purchase.

- Q1. WHERE IS THE PALMS RESIDENCES ABUJA-FCT?**  
A THE PALMS RESIDENCE is an undeveloped parcel of land located at LUGBE OPPOSITE SHOPRITE F.C.T ABUJA
- Q2. WHO ARE THE OWNERS/DEVELOPERS OF THE PALMS RESIDENCES ABUJA-FCT?**  
A PWAN MAX, a Leading Real Estate Company with offices in Enugu State, Owerri Imo State, Awka Anambra State, Uyo, Akwa-Ibom State, Port Harcourt, Rivers State, Asaba, Delta State & Lekki, Lagos State.
- Q3. WHAT TYPE OF TITLE DOES THE PALMS RESIDENCES ABUJA-FCT HAVE ON THE LAND?**  
A C OF O.
- Q4. ARE THERE ANY ENCUMBRANCES ON THE LAND?**  
A The land is free from every known government interests or adverse claims.
- Q5. WHAT IS THE PAYMENT STRUCTURE?**  
A Outright payment of N18,000,000 only per 450sqm  
B 12 Months Instalment Payment is available and can be arranged.  
C N.B: Non-Payment of the monthly instalments as at when due shall be treated as a fundamental breach of the contract which shall result in termination or revocation of the contract/ OR attract default charge of 10% of the month payment.
- Q6. WHAT IS THE SIZE OF THE PLOT?**  
A 450 SQM
- Q7. IS THE ROAD TO THE ESTATE MOTORABLE?**  
A Yes. The road to the estate is motorable and is maintained by PWAN.
- Q8. WHAT OTHER PAYMENTS DO I MAKE APART FROM THE PAYMENT FOR THE LAND?**  
A Deed of Assignment: N500,000 only per plot (Subject to review upwards)  
B Survey Fee: N400,000 only per plot (Survey Plan with Company's name attracts extra charges) (Subject to review upwards)  
C Plot Demarcation: N50,000 only per plot (Subject to review upwards)  
D Development Fee: N5,000,000 only per plot (Subject to review upwards) Development fee Covers the following (1) Drainage construction (2) Electrification (3) Creation of good road network (4) Landscaping & beautification (5) Special amenities.
- Q9. WHEN DO I MAKE THE OTHER PAYMENTS?**  
A (i) Deed of Assignment, Provisional Survey Fee and Corner Plot Demarcation payment can be made immediately. (ii) Development Fee can be made after physical allocation of plot.
- Q10. WHAT DO I GET AFTER THE INITIAL PAYMENT DEPOSIT?**  
A Starters pack comprising a letter of acknowledgement of subscription, receipts of payment.
- Q11. WHAT DO I GET AFTER COMPLETING PAYMENT FOR THE LAND?**  
A Completion Payment Receipt, Contract of Sales & Allocation Notification Letter (a) Deed of Assignment & Survey Plan after Physical Allocation is done.
- Q12. CAN I START CONSTRUCTION OR BUILDING ON THE LAND NOW?**  
A Yes. You can start building on the land after Physical Allocation, while fencing and Estate development is going on.
- Q13. IS THERE ANY RESTRICTION REGARDING THE TYPE OF BUILDING I CAN CONSTRUCT IN THE ESTATE?**  
A Yes. The estate layout is in sections and you are limited to build houses on each section based on designated use or plan for that section (Commercial or Residential) i.e Bungalow, Block of Flats, detached houses (duplex). Note: "Face-me-I-Face-you" (Tenement Building) and Highrise houses will not be approved by the company and with The Federal Capital Territory afterwards.
- Q14. CAN I RE-SELL MY PLOT/PROPERTY?**  
A Yes. Subscribers who have paid up for their land (in full) can re-sell their plot(s). PWAN Max would require the seller to furnish the company with details of the buyer.  
B A Charge of 10% of the land consideration (Covering Transfer Documentation Fee) shall be paid to the company by the buyer.
- Q15. CAN I PAY CASH TO YOUR AGENT?**  
A We strongly advise that cash payments should ONLY be made to PWAN Max Property and Business Solutions at its designated Banks. Otherwise, cheque(s) should be issued in favor of PWAN Max Property and Business Solutions. We shall not accept any responsibility for any liability that may arise as a result of a deviation from the above instruction.
- Q16. WHAT HAPPENS IF I CANNOT CONTINUE WITH MY PAYMENT? CAN I REQUEST FOR A REFUND?**  
A Yes, you can apply for refund only if you have NOT been allocated your plot(s). In the event of a Refund, you are required to give the Company Ninety (90) days' notice to process your refund request and a further Sixty (60) days if the process isn't completed after the first 90 days. The refund shall be processed and paid less 40% (Administrative Fee and Others).

I hereby confirm that I have seen the land and ready to go on with the transaction.  
THEREFORE, THE INFORMATION PROVIDED, TERMS & CONDITIONS HERE WITH IS ACCEPTABLE AND CONSENTED BY ME, I ACKNOWLEDGE RECEIVING A COPY OF

SUBSCRIBER'S NAME

SIGNATURE

DATE

31/01/2022





TYPE OF TRANSFER

☒ Other Bank Transfer (Instant)

☐ Transfer to First Bank Accounts (NGN/FCY)

☐ RTGS ☐ Bank Draft Issuance

AA 04033320

Originating Branch

KUMASI ABUJA

Sender's Name

[REDACTED]

Total Amount in figures/word

₦12,000,000.00

DETAILS OF BENEFICIARY A

Name

PWATO MAX PROPERTY

Account Number

4611420733

Amount / Bank

₦12,000,000.00 / FIDELITY

Transaction Date  
18/10/2021

Sender's Account Number  
020432693

DETAILS OF BENEFICIARY B

Name

ABUJA MAIN BRANCH

Account Number

ABUJA MAIN BRANCH

Amount / Bank

ABUJA MAIN BRANCH

Officer's Name, Signature and Date

OSBUNYA J.P. 13/11/22

Officer's Stamp





OFFICE: Km42, Iekki-Eke Expressway Opposite Children's Place Plaza,  
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos  
Tel: +234-8180000652, +234-8180000637  
Email: pwanmaxproperties@gmail.com

## Sales Receipt

Sold To:


08033762483

Date: Apr 13, 2022  
Receipt #: FIDELITY/2022/0002  
File #: PMX/TPRA/2022/000028  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Fidelity Bank Plc	1	The Palms Residences Abuja- Fct	6Mths

Description	Line Total
Being Further payment for One(1)plot of Land at The Palms Residences Abuja-Fct	N 12,000,000.00
Amount in words: Twelve Million Naira and Zero Kobo	
	Subtotal N 12,000,000.00 Tax N 0.00 Total N 12,000,000.00

Additional Information;		
Total Amount:	N 18,000,000.00	
Outstanding Balance:	N 3,000,000.00	
Size per Plot:	450sqm	

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature




OJ AND MARC BUSINESS COMPLEX, KM 42  
LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S  
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS  
08180000652, 07064000761,

JANUARY 31, 2022.



Dear Sir,

### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦3,000,000.00 (Three Million Naira)** only, as initial- payment for **One (1) Residential plot of land** measuring **450sqm** at **The Palms Residences Abuja FCT, Situated at Lugbe Opposite Shoprite FCT Abuja.**

The total cost of the plot as at the date of this payment is **₦18, 000,000.00(Eighteen Million Naira)** only, for six months scheme.

The expected balance is **₦15, 000,000.00(Fifteen Million Naira)** only.

You are expected to pay **₦2,500,000.00(Two Million, Five Hundred Thousand Naira)** monthly before the end five months starting from the month of March 2022, which is to offset the remaining balance of **₦15, 000,000.00(Fifteen Million Naira)** only.  
*(Note that any default in your payment shall attract extra charges).*

Thank you very much for subscribing to **THE PALMS RESIDENCES** through **PWAN Max Property and Business Solution.**

Yours sincerely,



OJ AND MARC BUSINESS COMPLEX, KM 42  
LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S  
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS  
08180000652, 07064000761,

APRIL 13, 2022.



Dear Sir,

### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦12, 000,000.00 (Twelve Million Naira)** only, being further- payment for **One (1) Residential plot of land** measuring **450sqm** at **The Palms Residences Abuja FCT, Situated at Lugbe Opposite Shoprite FCT Abuja.**

The total cost of the plot as at the date of this payment is **₦18, 000,000.00(Eighteen Million Naira)** only, for six months scheme.

The expected balance is **₦3, 000,000.00(Three Million Naira)** only.

You are expected to pay **₦1, 500,000.00(One Million, Five Hundred Thousand Naira)** monthly, before the end Two months starting from the month of June 2022, which is to offset the remaining balance of **₦3, 000,000.00(Three Million Naira)**

*(Note that any default in your payment shall attract extra charges).*

Thank you very much for subscribing to **THE PALMS RESIDENCES** through **PWAN Max Property and Business Solution.**

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Yours sincerely,





OFFICE: Km42, Lekki-Epe Expressway Opposite Children's Place Plaza,  
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos  
Tel: +234-8180000652, +234-8180000637  
Email: pwanmaxproperties@gmail.com

## Sales Receipt

Sold To



Date: Jan 31, 2022  
Receipt #: FIDELITY/2022/0001  
File #: PMX/TPRA/2022/000028  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Fidelity Bank Plc	1	The Palms Residences Abuja- Fct	6Mths

Description	Line Total
Being Initial payment for One(1)plot of Land at The Palms Residences Abuja-Fct	N 3,000,000.00
Amount in words: Three Million Naira and Zero Kobo	
	Subtotal N 3,000,000.00
	Tax N 0.00
	Total N 3,000,000.00
Additional Information;	
Total Amount:	N 18,000,000.00
Outstanding Balance:	N 15,000,000.00
Size per Plot:	450sqm

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature

...making home ownership dreams a reality

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