



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 DELIVER FULL POSSESSION AND USABLE ACCESS TO ONE (1) RESIDENTIAL PLOT FULLY PAID FOR AT TEHILLA GARDEN ESTATE, IBEJU-LEKKI - ₦1,680,000

We write on behalf of our client, **Blessing Oyubu**, (hereinafter referred to as “the Petitioner”) to formally lodge this petition against **PWAN Homes Limited** for **breach of contract, persistent failure to deliver physical possession, and suspected misrepresentation** concerning **one (1) residential plot of land** fully paid for since **2016** at **Tehilla Garden Estate**, Ibeju-Lekki, Lagos State.

FACTUAL SUMMARY

1. My name is **Blessing Oyubu**. In **2016**, I purchased **one (1) residential plot of land** from **PWAN Homes Limited** at **Tehilla Garden Estate**, Ibeju-Lekki.
2. I paid **₦1,500,000 (One Million, Five Hundred Thousand Naira Only)** at once for the purchase of the plot.
3. I also paid an additional **₦180,000 (One Hundred and Eighty Thousand Naira Only)** separately as the **allocation fee** — unfortunately, I no longer have the receipt for this payment, but the fee was paid in full.
4. For years, **PWAN Homes Limited** kept **postponing the physical allocation**, giving one excuse or another until **December 2020**, when they finally arranged an allocation exercise.

5. At the time of allocation, I was out of the country, so my elder brother stood in for me and collected the allocation paperwork on my behalf.
6. When I returned to Nigeria, I personally visited **PWAN's office in Ajah**, and they took me to Tehilla Garden Estate. However, they could not show me the exact **allocated portion** because the entire area was still **bushy and undeveloped**, making it impossible to identify my specific plot without fresh clearing.
7. In **2022**, I visited again for follow-up and they again took me there — but the entire place was still bushy, overgrown, and with **no visible sign of any development** or any building structure by anyone in the estate.
8. When I asked why there was no sign of development, I was simply told: *"Once you people start building, others will follow."* This excuse has continued for years.
9. I know other buyers who are facing exactly the same issue at **Tehilla Garden Estate** — for example, a friend of mine who also bought a plot with PWAN Homes visited the same estate multiple times and was also surprised that **nobody has built anything** there since allocation.
10. It is suspicious that despite major projects like the **Dangote Refinery** opening nearby, which should have motivated genuine buyers to build, the entire site remains a bush with no evidence of valid residential plots.
11. To date, I only have **paperwork** showing I was "allocated" a plot — but **I have never been shown my actual plot in clear terms**, nor have I been able to fence or develop it because the site is bushy and there is no real evidence of the land being properly allocated.
12. This situation has gone on for **nine (9) years**, and it strongly appears that we buyers have been defrauded or misled into paying for plots that may not exist as promised.

ALLEGED OFFENSES

The conduct of **PWAN Homes Limited** in my case amounts to:

- **Breach of Contract** — for failing to deliver genuine physical possession despite full payment and allocation fees.
- **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**.
- **Fraudulent Misrepresentation** — marketing undeveloped or non-existent plots while collecting large sums of money.
- **Unfair Trade Practices** — in violation of the **Federal Competition and Consumer Protection Act (FCCPA), 2019**.

RELIEFS SOUGHT

I respectfully request that your esteemed office:

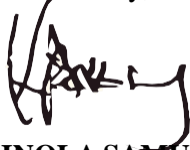
1. Conduct a **thorough investigation** into **PWAN Homes Limited**, its directors, officers, and all persons who facilitated the sale and purported allocation of my plot at **Tehilla Garden Estate, Ibeju-Lekki**.

2. Confirm the genuine status and validity of the estate — whether it truly exists, whether it is genuinely excised, and whether buyers can legally take possession.
3. Compel PWAN Homes Limited to either:
 - Properly **clear and show my allocated plot**, deliver valid title documents, and assist me to take full possession for development; or
 - Refund the total sum of **₦1,680,000 (One Million, Six Hundred and Eighty Thousand Naira Only)**, with accrued interest and appropriate compensation for the stress and wasted time over nine years.
4. Prosecute any officers or agents found culpable for misrepresentation or misuse of my funds.
5. Enforce stronger regulatory oversight to protect other innocent land buyers from falling victim to the same fraudulent pattern.

ATTACHED DOCUMENTS

- Hard copy **Contract of Sale**;

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

DATE:

FILE #:

Dear Valued Client,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name:	TEHILLA GARDENS ESTATE, LAGOS
No of Plot(s):	1 PLOT (RESIDENTIAL)
Plot Details:	BLOCK F6 PLOT 11
Plot Size:	600 SQMS EACH

NB: 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,



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

Sales Receipt

Sold to:

Date:
Receipt #:
File #:

Payment Method	Reconciling Bank	Land Location	DURATION		
INSTALLMENT	GTB	TEHILLA GARDEN 1 Estate	1 MONTHS		
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	±005qm	Full Payment for One(1) plot of land at TEHILLA GARDEN 1 Estate.	1,500,000.00		1,300,000.00

Amount in words: One Million, Five Hundred
Thousand Naira Only

Total Discount

Subtotal 1,500,000.00
Sales Tax
Total 1,500,000.00

FOR PWAN HOMES LTD:

Signature

Received By:

Signature





HEAD OFFICE: No. 6 Highway Street, YABBA ANNER, OFF LAGOS Expressway Epe,
By Central Filling Station, beside Garden Park Estate, Ojo, Lagos State.
Tel: +234 1 2706848
HEAD OFFICE 25A, Surulere Close off (Dagb) Road by CTR, Oshodi, Lagos State.
Tel: +234 1 2957204. Email: pwanhomes@yahoo.com, info@pwanhomes.com

Dear MISS. OYUBU BLESSING ONIOVOSA,

ALLOCATION LETTER FOR ONE PLOT OF LAND AT TEHILLA GARDENS ESTATE ALONG AKODO ROAD, IBEJU-LEKKI L.G.A

Congratulations Madam, we are pleased to inform you that One (1) plot of land have been allocated to you in Tehilla Gardens Estate, along Akodo Road, Ibeju Lekki Local Government Area of Lagos State.

Please find the description of the allocation below:

LOCATION: Along Akodo Road, Ibeju-Lekki Local Government Area of Lagos State

SIZE: One (1) Plot of Undeveloped land measuring 600sqm.


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

Kindly pay the sum of N20,000 only per plot as Plot Demarcation (4 Corner Piece) fee for your plot into any Diamond Bank. Account Name: Folkland Property Development Company, Account Number: 0035628388.

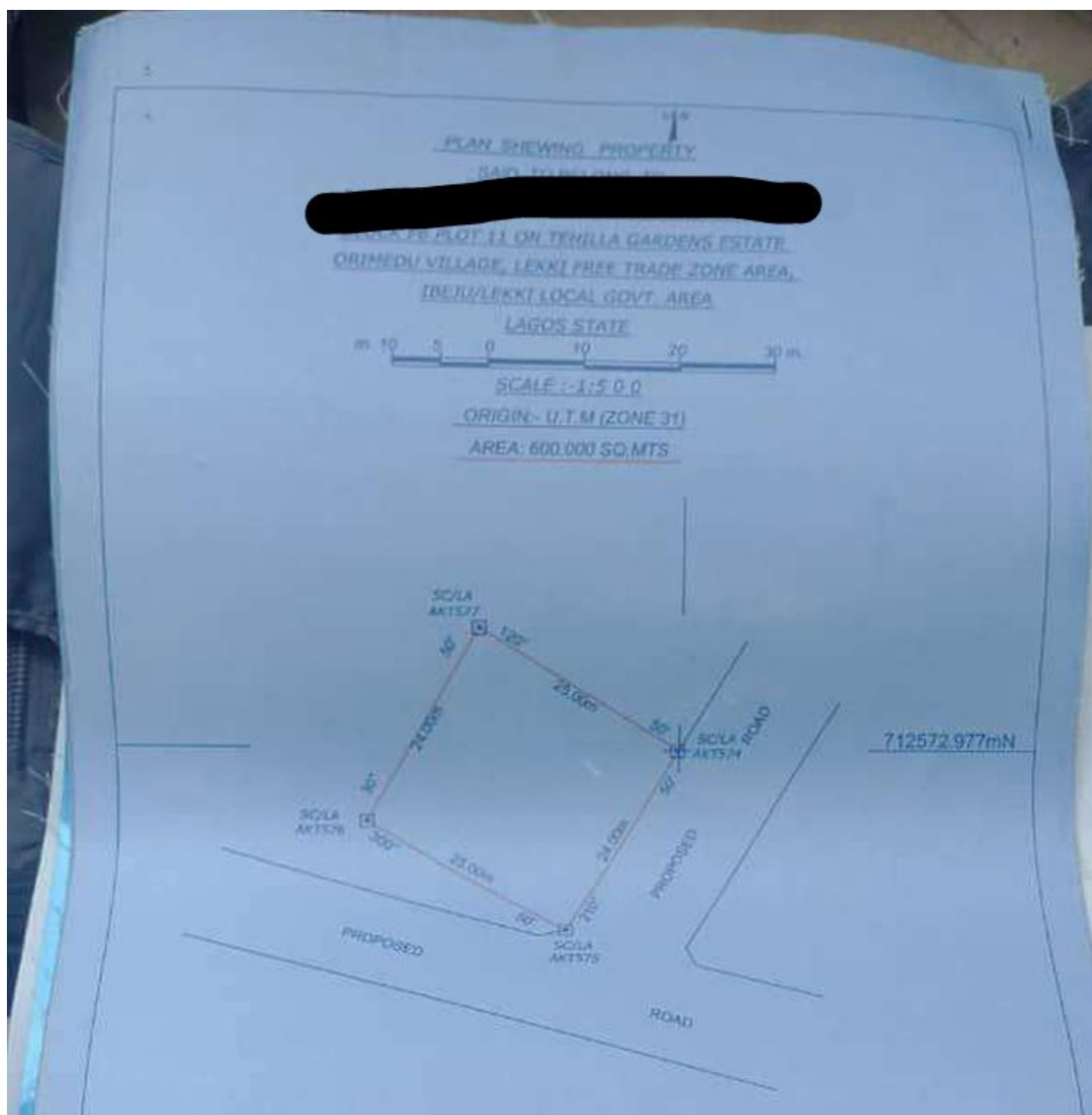
Your provisional Survey Copies containing full details of your plot will be made available to you after physical allocation.

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,


Barr. Emili Ajogwu

Legal Officer (Pwan Homes Ltd)



CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD
(THE VENDOR)

AND

M [REDACTED]

IN RESPECT OF ONE (1) PLOT OF LAND AT TEHILLA GARDENS SITUATE ALONG
AKODO ROAD, IBEJU-LEKKI LOCAL GOVERNMENT AREA OF LAGOS STATE

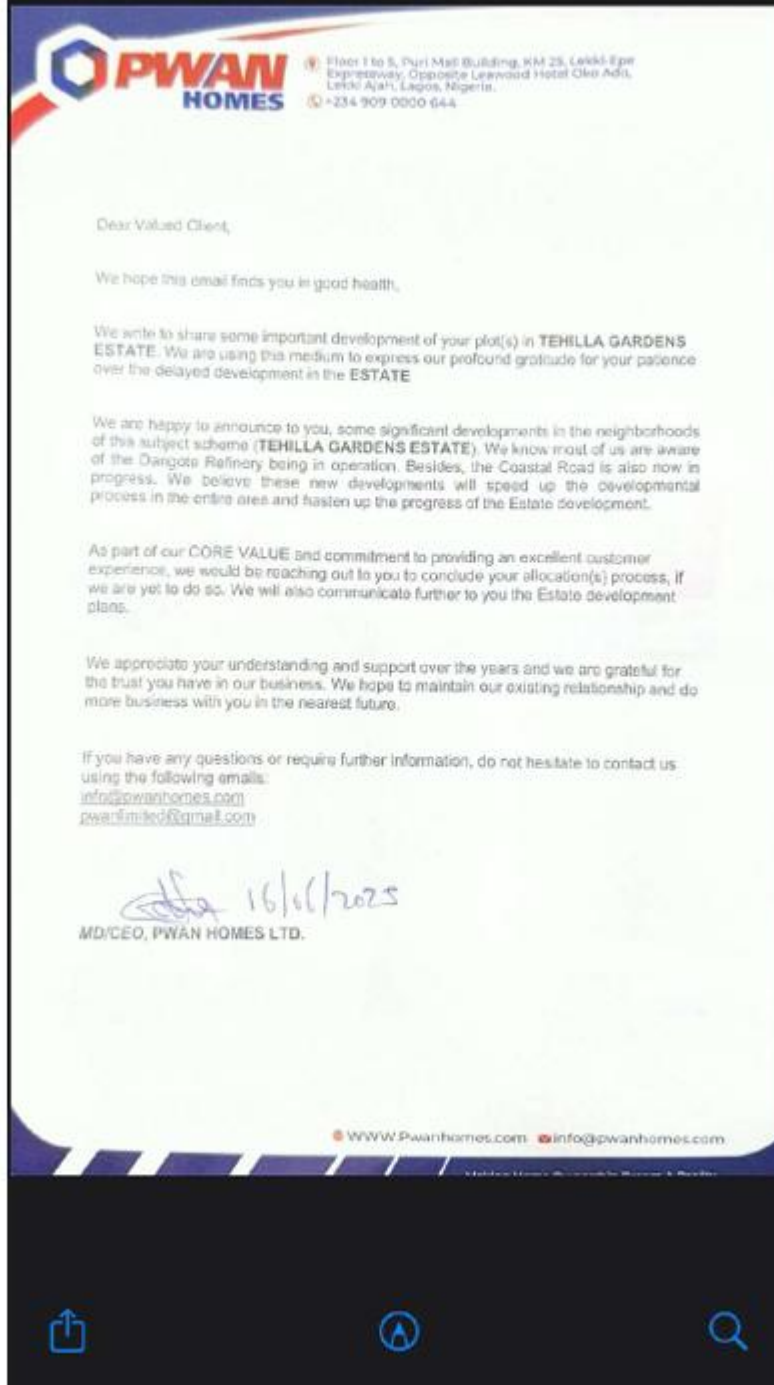
Prepared by,

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

IKEJA 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

IKERJA 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.

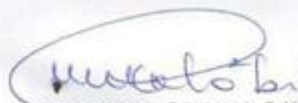
Physical allocation starts on Tuesday 13th February, 2018 and your scheduled date for your physical allocation will be communicated to you in due course.

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