

Delivered via Email

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)

Okoko Ado, Ajah, Lagos State

Nigeria

Email: info@pwangroup.com, pwanpronigeria@gmail.com

The Managing Director

PWAN Pro Realtors and Estates Limited

CDV Court 1

Opposite Catholic Church of the Epiphany

Ologolo Village Road

Lekki Peninsula Phase 2, Lekki

Lagos State, Nigeria

Email: info@pwanpro.com, pwanpronigeria@gmail.com

**PETITION AGAINST PWAN CHAMPION REALTORS & ESTATES LIMITED
FOR FAILURE TO ALLOCATE LAND DESPITE FULL PAYMENT TOTALING
₦2,400,000.00 (TWO MILLION, FOUR HUNDRED THOUSAND NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as “the alleged petitioner”) to formally lodge a petition against PWAN CHAMPION REALTORS & ESTATES LIMITED for acts that constitute breach of contract, obtaining by false pretences, and fraudulent misappropriation of funds in violation of the laws of the Federal Republic of Nigeria.

FACTS OF THE CASE:

1. The alleged petitioner paid the sum of **₦1,500,000.00 (One Million, Five Hundred Thousand Naira Only)** to PWAN CHAMPION REALTORS & ESTATES LIMITED on 21st September 2022 for the purchase of land located in Asaba, Delta State.
2. An additional payment of **₦900,000.00 (Nine Hundred Thousand Naira Only)** was made on 8th April 2024, bringing the total amount paid to **₦2,400,000.00 (Two Million, Four Hundred Thousand Naira Only)**.
3. The company issued a receipt and contract of sale confirming the transaction and assuring the petitioner of land allocation upon full payment.
4. Despite these confirmations and the complete financial commitment made by the petitioner, **no physical allocation of the land has been made to date**, neither has the company provided any means of refund.

APPLICABLE CRIMINAL LEGAL BREACHES:

1. Section 312 of the Criminal Code Act, Cap C38, LFN 2004 – relating to criminal breach of trust.
2. Section 419 of the Criminal Code Act – which criminalizes obtaining property or credit under false pretences.
3. Section 1(1)(a) of the Advance Fee Fraud and Other Related Offences Act, 2006 – relating to obtaining financial advantage by false representation or promise.

RELIEFS SOUGHT:

In light of the foregoing, we humbly request that your esteemed office:

1. **Investigate** the activities of PWAN CHAMPION REALTORS & ESTATES LIMITED and its officers concerning this transaction.

2. **Prosecute** any person(s) found culpable for criminal breach of trust or obtaining money under false pretences.
3. **Compel the company** to allocate the Promised Land or refund the full amount of ₦2,400,000.00 to the petitioner.
4. **Take preventive actions** to protect the public from falling victim to similar misconduct by real estate firms.

ATTACHED DOCUMENTS:

- Copies of payment receipts dated 21st September 2022 and 8th April 2024.
- The signed contract of sale issued by the company.
- Additional supporting documentation available on request.

We trust in your swift and thorough intervention to ensure that justice is served and confidence in real estate transactions is restored.

Yours faithfully,

On behalf of the Alleged Petitioner



Office: 16A, Sule Abaka Street,
Off Opabi Road,
By GTBank Ikaja, Lagos.
Tel: +234909999066, +2349099999581
Email: info@pwanexcel.com, pwanexcel@gmail.com
website: www.pwanexcel.com

Sales Receipt

Date: 21-Sep-22
Receipt #: ZB/PCPC/2022/0001
File #: PCPC/CGA/2022/0013
Comment: ckingsley669@gmail.com

Payment Method	Reconciling Bank	Scheme	Duration
Outright	Zenith Bank Pl	Choice Gardens Asaba	Outright
Description			Line Total
Being Full Payment for 2plots of 464sqm (CGA) CHOICE GARDENS ASABA			N 1,500,000.00
Amount in words: One Million, Five Hundred Thousand Naira Only			
Subtotal			N 1,500,000.00
Tax			N -
Total			N 1,500,000.00

Additional Information

Total Amount: N 1,500,000.00
Outstanding Balance: N -
Plot Size: 464 Sqm

FOR PWAN Excel Property Choice Ltd

KINLEYE SAMUEL

Signature

SUCCESSFUL!

NGN 900,000.00



PWAN EXCELPROPERTY CHOICES LTD

Monday, 08 April 2024, 01:55 pm



BENEFICIARY ACCOUNT



TRANSACTION TYPE

other-local-banks



SENDER NAME



DESTINATION BANK

Zenith Bank



NARRATION

payment for land documents in asaba

Successful



Transaction Successful

Paid On 21 Sep 2022, 10:19 GMT+1

Sender

Beneficiary PWAN EXCEL PROPERTY CHOICES LTD

Beneficiary Bank ZENITH BANK PLC

Amount 1,500,000 NGN

[Rate Our Service](#)

[Done](#)

Transfer receipt has been generated

[Share](#)

[Preview](#)

CONTRACT OF SALE

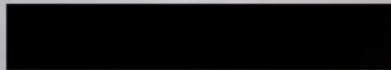
BETWEEN

PWAN EXCEL PROPERTY CHOICES LTD

RC: 1706754

(THE VENDOR)

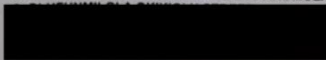
AND



IN RESPECT OF ONE (2) RESIDENTIAL PLOT OF 928SQM LAND IN
CHOICE GARDENS ASABA, IBUSA ROAD, DELTA STATE, NIGERIA.

PREPARED BY:

EMMANUEL NDUBUISI, ESQ.
C/O THE LAW FIRM OF OLUKAYODE A. AKOMOLAFE





Office: 16A, Sule Abaka Street,
Off Opebi Road,
By GTBank Ikeja, Lagos.
Tel: +2349099999066, +2349099999068
Email: info@pwanexcel.com, pwanexcel@gmail.com
Website: www.pwanexcel.com

Documentation Fees Receipt

Date: 8-Apr-24

Receipt #: ZB/PEPC/2024/0001
File #: PEPC/CGA/2024/0001
Comment: ckingsley66@gmail.com

Payment Method	Reference/To the Bank	Scheme	Duration
Outright	Zenith Bank Plc [REDACTED]	Choice Garden, Asaba	OUTRIGHT
Description			Line Total
Down Payment for 2plot of 464sqm Choice Garden, Asaba (CGA)			N 900,000.00
Survey Plan, Deed of Assignment and Plot Demarcation			
Amount in words: Nine Hundred Thousand Naira Only			
			Subtotal
			Tax N -
			Total N 900,000.00

Additional Information

Total Amount: N 900,000.00

Outstanding Balance: NIL

Plot Size: 464Sqm

FOR PWAN Excel Property Choice Ltd

GENJI HUNMI

Signature