



07077513836

eluyefachambers@gmail.com

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 CHAMPION REALTORS AND ESTATES LIMITED, PWAN MAX HIVE, AND
PWAN PRIME FOR LAND FRAUD, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD –
₦8,660,000**

We are solicitors to the Petitioner, hereinafter referred to as “our client,” and on their behalf, we submit this formal criminal complaint against **PWAN Champion Realtors and Estates Limited**, and its affiliates **PWAN Max Hive** and **PWAN Prime**, for acts of **fraud, criminal breach of trust, and deliberate refusal to allocate land** despite full payment for four plots of land across different estates since 2022.

FACTUAL SUMMARY

1. In **2022**, our client subscribed to two separate land transactions marketed and sold by subsidiaries under the **PWAN Group umbrella**.
2. The first transaction was with **PWAN Max Hive**, in which our client purchased **two (2) plots of land**, and paid a total sum of **₦5,060,000 (Five Million, Sixty Thousand Naira)**. This amount covered:

- Cost of two plots of land
 - Development levy
 - Survey plan fee
 - Deed of Assignment
3. Despite making full payment since **2022**, **PWAN Max Hive** has failed, refused, and/or neglected to allocate the said land to our client or issue any valid title documents.
 4. In the second transaction, our client paid **₦3,600,000 (Three Million, Six Hundred Thousand Naira)** to **PWAN Prime** in **July 2022** for **two (2) plots of land**. Again, up till this date, **no allocation** has been done and no documentation has been issued.
 5. The total investment made by our client across both transactions is **₦8,660,000 (Eight Million, Six Hundred and Sixty Thousand Naira)** — and to date, no plot has been allocated under either scheme.
 6. Multiple attempts by our client to obtain possession and documentation — through **phone calls, emails, and physical visits to the offices** of PWAN and its subsidiaries — have been met with **silence, excuses, and broken promises**.
 7. The prolonged non-performance of contractual obligations by **PWAN Champion Realtors, PWAN Max Hive, and PWAN Prime** amounts to **deliberate fraud, breach of trust, and a coordinated scheme to defraud**.

CRIMINAL OFFENCES DISCLOSED

The acts and omissions of PWAN and its subsidiaries constitute multiple offences under Nigerian law, including:

- **Advance Fee Fraud and Obtaining by False Pretence** – contrary to Section 1(1)(a) and (3) of the *Advance Fee Fraud and Other Fraud Related Offences Act, 2006*;
- **Criminal Breach of Trust** – contrary to Section 312 of the *Criminal Code Act*;
- **Conspiracy to Defraud** – contrary to Section 516 of the *Criminal Code Act*;
- **False Representation and Misleading Trade Practices** – contrary to Section 14 of the *Federal Competition and Consumer Protection Act (FCCPA), 2019*;
- **Cheating** – contrary to Section 421 of the *Penal Code Act* (if applicable).

PRAYERS

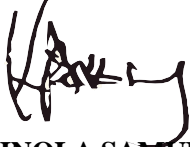
On behalf of our client, we respectfully seek the following reliefs:

1. That your office conducts a **full criminal investigation** into the fraudulent conduct of PWAN Champion Realtors, PWAN Max Hive, and PWAN Prime;
2. That **all responsible individuals — including directors, marketers, and allocation officers — be prosecuted** in accordance with the law;
3. That the sum of **₦8,660,000** be **refunded in full** to our client, or in the alternative, that all **four (4) plots of land be immediately allocated** with valid title documents;
4. That compensation be awarded to our client for **emotional distress, financial loss, and breach of trust**;
5. That regulatory bodies and law enforcement agencies **sanction the PWAN Group** and monitor its operations to prevent recurrence of this fraudulent pattern affecting hundreds of investors.

Our client is ready to provide all supporting documents, including **receipts, transfer confirmations, email communications**, and sworn affidavits, and is willing to cooperate fully with your office to ensure justice is done.

Thank you for your anticipated intervention.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Akinola Samuel Eluyefa', written in a cursive style.

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



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

AUG 9, 2022



Dear Valued Client,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: MAX HIVE, EPE
No of Plots: ONE PLOT
Type of Plot: RESIDENTIAL
Size: 550SQM
Plot Details: BLOCK 8, PLOT 2
Date of Allocation: 13TH AUGUST, 2022

NB: This letter is **ONLY** authenticated upon the receipt of your survey plan, Payment of your Deed of Assignment and payment of your development fees respectively for your subscribed Plot(s).

Subsequently, you are responsible for the clearing of your land after allocation if you have not started building. However, we want to encourage you to start building so that the development of the estate will be fast.

Take note that we have free building plans that can help you with your building at market friendly prices. Kindly get back to our Customer Service department for how to start your building.

Thank you for choosing **PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LIMITED.**

Yours faithfully,

NWAIGWE FRANKLIN
GENERAL MANAGER

EGBUNIKE FRANCISCA
HOD, ADMIN



PWAN PRIME INVESTMENTS AND PROPERTIES LTD.

SALES RECEIPT

Sold to:

Date: _____

Receipt #:

Receipt
File #:

AMOUNT IN WORD: THREE MILLION, SIX HUNDRED THOUSAND NAIRA ONLY.

FOR PWAN PRIME:

ANUNIKE IFEYINWA

Signature: 

Received By:

Signature: _____

CONTACT ADDRESS: 23A, SURA MOGAJI STREET, OFF COKER ROAD, ILUPEJU, LAGOS.



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

[REDACTED]
25th Nov 2024

Dear Sir ,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment for Two **(2) Residential plots** of land measuring **600Sqm each**, in **MAX HIVE , EPE, ,** Located at Lamutaba- Omu Ijebu Epe, Lagos State.

We also acknowledge these payments in the following order;

Plot Demarcation the sum of **₦30,000 only**

Survey fee the sum of **₦150,000 only**

Deed of Assignment the sum of **₦ 100,000 only**

Development fee the sum of **₦750, 000.00 only**

Thank you very much for subscribing to **MAX HIVE , EPE** through **PWAN Max Property and Business Solution.**

Yours sincerely,

NWAIGWE FRANKLIN
General Manager

FOR: PWAN Max Property and Business Solution