

**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@pwanpro.com](mailto:info@pwanpro.com), [pwanpronigeria@gmail.com](mailto: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](mailto:info@pwanpro.com), [pwanpronigeria@gmail.com](mailto:pwanpronigeria@gmail.com)

**PETITION AGAINST PWAN CHAMPION REALTORS & ESTATES LIMITED  
FOR FAILURE TO ALLOCATE LAND AFTER PAYMENT OF ₦1,980,000.00  
SINCE 2019**

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 alleged fraudulent conduct, breach of contractual obligation, and obtaining funds by false pretences.

## FACTS OF THE CASE:

1. In 2019, the alleged petitioner made full payment in the sum of **₦1,980,000.00 (One Million, Nine Hundred and Eighty Thousand Naira Only)** to PWAN CHAMPION REALTORS & ESTATES LIMITED for the purchase of a parcel of land. A copy of the payment proof is attached to this petition.
2. Following this payment, the petitioner made **two separate visits to Nigeria from abroad** to inspect the land, as promised by the company. However, on both occasions, the petitioner was met with **excuses, shifting narratives, and failure to provide access or documentation** regarding the said land.
3. Despite repeated attempts to obtain clarity and fulfilment of the contractual obligation, **no land was ever allocated**, and no meaningful response was provided by PWAN CHAMPION REALTORS & ESTATES LIMITED.
4. The petitioner has now lost confidence in any form of investment in Nigeria due to the **unprofessional and deceitful conduct** of the company and is demanding a **full refund** of the payment made.

## APPLICABLE LEGAL BREACHES:

The actions of PWAN CHAMPION REALTORS & ESTATES LIMITED violate several laws, including:

1. **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust.
2. **Section 419 of the Criminal Code Act** – Obtaining property or credit under false pretences.
3. **Consumer Protection Laws** – which prohibit deceptive trade practices and failure to deliver on paid-for services.

## RELIEFS SOUGHT:

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

1. **Investigate** PWAN CHAMPION REALTORS & ESTATES LIMITED and its responsible officers for fraudulent misrepresentation and failure to fulfill contractual obligations.
2. **Prosecute** any person(s) found culpable in accordance with the law.
3. **Compel a full refund** of the sum of **₦1,980,000.00** to the petitioner.
4. Take **appropriate regulatory and punitive measures** to deter similar infractions against other citizens and investors.

## ATTACHED DOCUMENTS:

- Proof of payment for the sum of ₦1,980,000.00 made to PWAN CHAMPION REALTORS & ESTATES LIMITED.
- Travel documentation (available on request) evidencing multiple visits to Nigeria for land inspection.
- Correspondences or communication logs (available on request).

We trust that this matter will receive your **urgent attention** and be handled with the seriousness it deserves.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*



## PWAN HAVEN INVESTMENT & REALTORS LTD

**a:** 10, Road 7, Lekki County Homes,  
Ikota Villa Estate, Lekki Epe Expressway Lagos.  
**t:** 014535821  
**e:** pwanhaven@gmail.com  
**w:** www.pwanhaven.com

APRIL 10<sup>TH</sup>, 2019

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Valued Client,

### PHYSICAL ALLOCATION NOTIFICATION

We hereby notify you of your allocation with the following information:

Estate Name: OAK HAVEN

Quantity: 1PLOT

Plot Details: BLOCK 21 PLOT 8

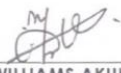
Date of Allocation: 10<sup>TH</sup> APRIL, 2019

We request you to kindly note that this letter is temporary, pending the receipt of your survey plan. Subsequently, you are responsible for the clearing of your land after physical allocation

Thank you for choosing PWAN HAVEN INVESTMENT & REALTORS LTD.

Yours Faithfully,

  
**FREDERICK .E. OKPAJE**  
Managing Director  
PWAN HAVEN LTD

  
**WILLIAMS AKUKALI**  
Admin Officer  
PWAN HAVEN LTD



Providing HOME ownership and investment opportunity

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

SALES RECEIPT

Sold to:

Date:

Receipt #:

File #:

Payment Method	Reconciling Bank	Estate	Duration		
FINAL	ZENITH BANK	OAK HAVEN	3MONTHS		
ONE(1) RESIDENTIAL PLOT ON A CORNER PIECE PLOT.					
Qty	Size #	Description	Unit Price	Discount	Line Total
1.00	600 Sqm	Full Payment for One (1) Residential Plot of Land at OAK HAVEN ESTATE located Agan Ofiran Village, Ibeju-Lekki.	1,980,000.00		1,980,000.00

Amount in words: One Million, Nine Hundred & Eighty Thousand Naira Only.

Total Discount

Subtotal 1,980,000.00

Sales Tax

Total 1,980,000.00

FOR PWAN HAVEN LTD: UDEKOYE GERARD

Signature

Received By:

Signature

Contact Address: No 10, Road 7, Lekki County Homes, Ikota Villa Estate, Lekki Epe Expressway, Lagos.  
Tel: 07026000037, 08107009359. Email Address: pwanhaven@gmail.com Website: www.pwan-haven.com





No 10, Road 7, Lekki County Homes,  
Ikota Villa, Lekki Epe Expressway, Lagos State.  
+234-7026000037, +234-9060004376

1<sup>st</sup> April, 2019

Dear Sir,

#### PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment for One (1) Residential Plot on a Corner Piece Plot of land at OAK HAVEN, Agan Ofiran Village, Ibeju-Lekki Local Government Area of Lagos State.










Please find below the description of the Land you purchased:

LOCATION: Agan Ofiran Village, Ibeju-Lekki Area of Lagos State.

TYPE/SIZE: One (1) Residential Plot on a Corner Piece Plot of undeveloped parcel of land measuring 600sqm each.

TITLE: Registered Survey, EXCISION File No (DLS/EXC/639) & Deed of Assignment.

You are required to make the following payments:

1.     100%      your
2. Plot Demarcation Fee: To pay the sum of ₦50,000 only per plot for your plot demarcation.
3. Deed of Assignment Fee: To pay the sum of ₦200,000 only per plot, being the payment for your Deed

of Assignment.

4. Facilitation Fee: To pay the sum of ₦200,000 only per plot for Facilitation Fee.

5. Development Fee: We would kindly advise you on the cost for the Development fee at a later date.

Payment shall be made into any Zenith Bank branch. Account Name: PWAN HAVEN INVESTMENT & REALTORS LTD, Account Number: 1015344637.

Your provisional Survey Copies containing full details of your plot shall be made available to you after your physical allocation and confirmation of payment as indicated above.

Thank you very much for subscribing to OAK HAVEN ESTATE through PWAN Haven Investments & Realtors Ltd.

Sincerely,

Ifedma Obi  
Legal Officer (Pwan Haven)



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- Land Survey
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SALES RECEIPT

Sold to:

[REDACTED]

Date:

[REDACTED]

Receipt #:

File #:

Payment Method	Reconciling Bank	Est. No.	Duration
FINAL	ZENITH BANK	OAK HAVEN	3MONTHS
ONE(1) RESIDENTIAL PLOT ON A CORNER PIECE PLOT.			

Size	Description	Unit Price	Discount	Total
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Subtotal 1,980,000.00  
Sales Tax  
Total 1,980,000.00

FOR PWAN HAVEN LTD: UDEKOYE GERARD

Signature

Received By:

Signature



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Tel: 07026000037, 08107009359. Email Address: pwanhaven@gmail.com Website: www.pwan-haven.com