



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](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 CHAMPION REALTORS AND ESTATES LIMITED FOR LAND FRAUD, NON-ALLOCATION, AND BREACH OF CONTRACT – ₦750,000 TOTAL MONETARY LOSS**

We write to formally petition **PWAN Champion Realtors and Estates Limited**, a subsidiary of the PWAN GROUP, for engaging in fraudulent misrepresentation and deliberate failure to allocate land to our client despite receiving full payment. On the strength of repeated assurances by company agents and representatives, our client made a payment of **₦750,000** to PWAN Champion Realtors and Estates Limited for the purchase of a plot of land in one of its advertised estates. However, **no allocation has taken place to date**, and all follow-up efforts have been stonewalled, dismissed, or ignored.

**DETAILED FACTS OF THE CASE**

1. Our client subscribed to a land offer by **PWAN Champion Realtors and Estates Limited**, under the PWAN Group, and made a full payment of **₦750,000** in 2021 for a plot of land in one of its listed estates.
2. At the time of purchase, PWAN Champion assured our client of **prompt allocation and documentation**, including a survey plan and deed of assignment.
3. Since payment was made, **no allocation has been carried out**, nor has any valid documentation been issued to the complainant.
4. Multiple attempts by the client to get updates—via phone calls, emails, physical visits to the company's offices—have **yielded no tangible result**. In many instances, company representatives have become unreachable, further confirming a pattern of deceit and fraudulent intent.
5. As at 2024, **over three years have passed** without fulfillment of contractual obligations, suggesting **intentional**

**misappropriation** of client funds under false pretenses.

#### **APPLICABLE LEGAL BREACHES**

The conduct of **PWAN Champion Realtors and Estates Ltd.** and its agents amounts to violations of the following Nigerian laws:

- **Advance Fee Fraud** – Section 419, Criminal Code Act.
- **Criminal Breach of Trust** – Section 312, Criminal Code Act.
- **False and Misleading Advertisement** – Section 14, Federal Competition and Consumer Protection Act (FCCPA), 2019.
- **Breach of Contract** – Based on failure to allocate land or issue agreed legal documentation.
- **Conspiracy to Defraud** – Section 516, Criminal Code Act.

#### **RELIEFS SOUGHT**

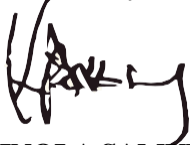
In view of the foregoing, we respectfully request that the appropriate investigative and regulatory agencies:

1. **Launch an immediate criminal and regulatory investigation** into PWAN Champion Realtors and its directors/agents.
2. **Compel the company to allocate the plot of land** for which payment of ₦750,000 was made, and issue all legal documentation accordingly.
3. In the alternative, **order a full refund of ₦750,000**, with interest and compensation for emotional and financial hardship.
4. **Commence criminal proceedings** against all responsible parties to prevent the continuation of similar real estate scams.
5. **Blacklist PWAN Champion Realtors** and restrict its business operations pending full resolution of this matter.

#### **ATTACHED DOCUMENTS (EVIDENCE)**

1. Proof of ₦750,000 payment to PWAN Champion Realtors and Estates Ltd.

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the alleged petitioner*



LAGOS OFFICE: 368 Freedom Way, Lekki Phase 1, By VFS Global,  
Opposite Delta Afrique Atlanta, Lagos State.  
PORTHARCOURT OFFICE: Suite 16, Bermo Plaza, 24 Isiokpo Street,  
Off Kaduna Street, D-Side, PortHarcourt Rivers State.  
☎ +234 818 888 8753, +2348188888841

JUNE 05, 2020

[REDACTED]  
Dear Sir,

#### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦500,000.00 (Five Hundred Thousand Naira)** only, being part-payment for One (1) Residential plot measuring **450sqm** of land, in **EXCEL VILLAS ESTATE**, situate at Jaloke Community, Islu Ikorodu, Lagos State.

The total cost of the plot as at the date of this payment is **₦750,000.00 (Seven Hundred and Fifty Thousand Naira)** only, for the Three months' scheme.

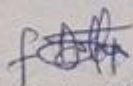
The expected balance is **₦250,000.00 (Two Hundred and Fifty Thousand Naira)** only.

You are expected to pay **₦125,000.00 (One Hundred and Twenty-Five Thousand Naira)** Monthly, before the end of Two months starting from the month of July 2020 which is to offset the remaining balance **₦250,000.00 (Two Hundred and Fifty Thousand Naira)** only.

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

Thank you very much for subscribing to **EXCEL VILLAS ESTATE** through **PWAN Royale Investment & Development Ltd.**

Yours sincerely,

 12-06-2020

Austin Ejiofor  
FOR: PWAN Royale Inv. & Dev. Ltd.

**ROYALE**

Off Ikoduro Street, D-line, Port Harcourt Rivers State.  
☎ +234 818 888 8753, +234818888841

15<sup>th</sup> June 2020

Lagos State

Dear Sir,

### **PAYMENT NOTIFICATION LETTER**

Sequel to the receipt of your payment for One (1) Residential Plot in Excel Villas, situate at Jaloke Community, Isiu Ikorodu, Lagos State.

Please find below the description of the allocation:

**LOCATION:** Jaloke Community, Isiu Ikorodu, Lagos State.

**SIZE:** One (1) Residential Plot of Undeveloped land measuring 4505qm.

**TITLE:** Undeveloped parcel of Land presently going through the process of excision at the Ministry of lands, Alausa, Lagos State.

You are required to make the following payments:

1. **Survey Fee:** To pay the sum of N 50, 000 only per plot, being the payment for your Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of N 30, 000 only per plot for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of N75, 000 only per plot for your Deed of Assignment.
4. **Development Fee:** To pay the sum of N 835 only per square meter for your Development Fee.

Your provisional Survey Copies containing full details of your plot shall be made available to you after your 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,



**OJOCHEMI OMAVICTOR**  
Admin Officer



**MR. AUSTIN EJIOFOR**  
Business Development Manager



## CONTRACT OF SALE

BETWEEN

**PWAN ROYALE INVESTMENT, & DEVELOPMENT LIMITED**

**{RC1310955}**

**(THE VENDOR)**

AND

**[REDACTED]**  
**(THE PURCHASER)**

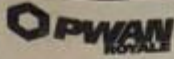
**IN RESPECT OF ONE (1) RESIDENTIAL PLOT OF LAND AT EXCEL VILLAS, JALOKE  
COMMUNITY, ISIU IKORODU, LAGOS STATE.**

PREPARED BY:

**EMMANUEL NDUBUISI, ESQ.  
C/O THE LAW FIRM OF OLUKAYODE A. AKOMOLAFE  
2, OLUFUNMILOLA OKIKIOLU STREET,  
OFF TOYIN STREET,  
IKEJA,  
LAGOS.**

**PWAN  
ROYALE**





Contact Address: 36B, Freedom Way, Lekki Phase 1, BY VFS Global,  
Opposite Delta Afrique Atlanta, Lagos.  
Tel: 08180145033, 08181945333.  
Email Address: pwanroyale@gmail.com

### Sales Receipt

Sold to:

Date: June 05, 2020

Rec:

File:

Payment Method		Reconciling Bank	Land Location		DURATION	
OUTRIGHT		POLARIS BANK	EXCEL VILLAS ESTATE		3 MONTHS	
Qty	Size #	Description	Amount	Instalment Per plot	Discount	Line Total
1.00	450 Sqm	Initial Payment for One (1) plot of land at Excel Villas Estate.	500,000	500,000		500,000.00
Total Discount						
Amount in words: Five Hundred Thousand Naira Only					Subtotal	500,000.00
					Sales Tax	
					Total	500,000.00

Total Amount: N 750,000.00  
Outstanding Bal: N 250,000.00

FOR PWAN Royale Inv & Dev. Ltd:

ABIOYE ADEDOLAPO

Signature

PWAN ROYALE INV. & DEV. LTD.

PAID

Sign

11-06-2020

Date

www.pwanroyale.com