

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)
Oko 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

Dear Sir/Madam,

**PETITION AGAINST PWAN CHAMPION REALTORS & ESTATES LIMITED FOR
ALLEGATIONS PERTAINING TO LAND ALLOCATION FRAUD AFOR THE
AMOUNT TO THE SUM OF ₦55,000,000.00 (FIFTY-FIVE MILLION NAIRA)**

We write on behalf of our client (hereinafter referred to as “*the Petitioner*”) to formally lodge this petition against **PWAN CHAMPION REALTORS & ESTATES LIMITED** for acts bordering on criminal breach of trust, obtaining by false pretences, and failure to fulfil contractual obligations following the receipt of substantial funds for real estate transactions.

FACTS OF THE CASE:

1. Our client made two separate payments to **PWAN CHAMPION REALTORS & ESTATES LIMITED** totaling **₦55,000,000.00 (Fifty-Five Million Naira Only)**—specifically, **₦37,000,000.00** and **₦18,000,000.00** respectively.
 2. These payments were made as consideration for the purchase of multiple plots of land at various estate locations as agreed upon between the parties.
 3. Upon receipt of the funds, **PWAN CHAMPION REALTORS & ESTATES LIMITED** issued a **Sales Receipt** and a **Payment Notification Letter** duly acknowledging the sums in question. (Copies of both documents are attached herewith.)
 4. The said funds were paid directly into the account of **PWAN PRO REALTORS & ESTATES LIMITED**, as evidenced by transaction screenshots and payment confirmations (attached).
 5. Despite numerous follow-ups and assurances from the company, **no land allocation has been made** to date, nor has any credible explanation been offered by the company or its representatives.
 6. This deliberate failure to allocate land after receiving full payment constitutes a breach of trust and a clear attempt to defraud our client.
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APPLICABLE LEGAL BREACHES:

The following statutory provisions appear to have been violated:

- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – *Criminal Breach of Trust.*
 - **Section 419 of the Criminal Code Act, Cap C38, LFN 2004** – *Obtaining by False Pretences.*
 - **Section 8 of the Advance Fee Fraud and Other Related Offences Act, 2006** – *Relating to the inducement of payment without intent to perform.*
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RELIEFS SOUGHT:

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

1. Investigate the financial and operational conduct of **PWAN CHAMPION REALTORS & ESTATES LIMITED** and **PWAN PRO REALTORS & ESTATES LIMITED** regarding the ₦55,000,000.00 received from our client.
2. Prosecute all persons found culpable under the relevant provisions of law.
3. Compel the company to either allocate the agreed plots of land or refund the entire sum paid.
4. Institute additional regulatory measures to ensure unsuspecting members of the public are not further defrauded by the company or its affiliates.

ATTACHED DOCUMENTS:

- Payment Notification Letter issued by PWAN
- Sales Receipt(s) issued by PWAN CHAMPION REALTORS & ESTATES LIMITED
- Screenshots of bank transfers and payment confirmations to PWAN PRO REALTORS & ESTATES LIMITED
- Additional correspondence and documentation available on request

We trust that this matter, which directly implicates the financial integrity and accountability of a corporate real estate entity, will be handled with the urgency and seriousness it deserves.

Yours faithfully,
[Your Name or Law Firm's Name]
On behalf of the Petitioner

Status

Completed

Transfer To
PWAN-PRO REALTORS
AND ESTATES LTD

Amount
NGN3,180,000.00

Beneficiary Account
Number

[REDACTED]

Transfer Type
Domestic-Other Bank

Bank Details
000015, Zenith Bank,
Lagos, 000015

Pay Via
NIBSS



Transfer From
C [REDACTED]

Transfer When
04 Jan 2021

Status
Completed

Transfer To
PWAN-PRO REALTORS
AND ESTATES LTD

Amount
NGN2,000,000.00

Beneficiary Account
Number
[REDACTED]

Transfer Type
Domestic-Other Bank

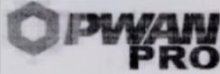
Bank Details
000015, Zenith Bank,
Lagos, 000015

Pay Via
NIBSS



Transfer From
[REDACTED]

Transfer When
24 Dec 2020



Contact Address: Cdv Court 1, Oppsite Catholic Church Of The Epiphany, Ologolo Road , Lekki Lagos.
Phone: 08181888837
Whatsapp: 08181888835
Email Address: pwanpronigeria@gmail.com

Sales Receipt

Date: [REDACTED]
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	Duration		
OUTRIGHT	ZENITH BANK	ZION RESIDENCE ESTATE	OUTRIGHT		
Qty	Size #	Description	Amount	Discount	Line Total
1.00	3 BEDROOM TERRACE DUPLEX	Outright Payment for One(1) unit of 3 Bedroom Terrace Duplex in ZION Residence Estate, Orchid Road Lekki Phase 2.	37,000,000.00		37,000,000.00

Amount in words: Thirty-seven Million naira Only

Total Discount

Subtotal 37,000,000.00
Sales Tax
Total 37,000,000.00

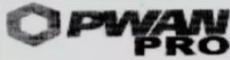
Total Amount N 37,000,000.00
Outstanding Bal:

FOR PWAN Pro Realtors and Estate Ltd:

EGUNLUSI ADEWALE



Signature



Contact Address: Cdv Court 1, Oppsite Catholic Church Of The Epiphany,
Ologolo Road , Lekki Lagos.
Phone: 08181888837, Whatsapp: 08181888835.
Email Address: pwanpronigeria@gmail.com

Sales Receipt

Date:

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location	Duration	
OUTRIGHT		ZENITH BANK	ZION GARDENS 3	OUTRIGHT	
Qty	Size #	Description	Amount	Discount	Line Total

6.00	600Sqm	Outright Payment for Six(6) residential plots with Two(2) free 300sqm of land in ZION GARDENS Phase 3 Estate.	18,000,000.00		18,000,000.00
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Total Discount

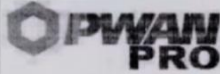
Amount In words: Eighteen Million Naira only.

Subtotal 18,000,000.00
Sales Tax
Total 18,000,000.00

Total Amount N 18,000,000.00
Outstanding Bal:

FOR PWAN Pro Realtors and Estate Ltd:

EGUNLUSI ADEWALE REALTOR
Signature
Date: 8/2/2023
Signature
ESTATE LIMITED



Contact Address: Cdv Court 1, Oppsite Catholic Church Of The Epiphany, Ologolo Road , Lekki Lagos.
Phone: 08181888837
Whatsapp: 08181888835
Email Address: pwanpronigeria@gmail.com

Sales Receipt

Date:
Receipt #:
File #:

Payment Method	Reconciling Bank	Land Location	Duration		
OUTRIGHT	ZENITH BANK	ZION RESIDENCE ESTATE	OUTRIGHT		
Qty	Size #	Description	Amount	Discount	Line Total
1.00	3 BEDROOM TERRACE DUPLEX	Outright Payment for One(1) unit of 3 Bedroom Terrace Duplex in ZION Residence Estate, Orchid Road Lekki Phase 2.	37,000,000.00		37,000,000.00

Amount in words: Thirty-seven Million naira Only

Total Discount

Subtotal 37,000,000.00
Sales Tax
Total 37,000,000.00

Total Amount N 37,000,000.00
Outstanding Bal:

FOR PWAN Pro Realtors and Estate Ltd:

EGUNLUSI ADEWALE



Signature