



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 (TEHILLAH GARDENS 1 ESTATE) FOR FRAUD, ATTEMPTED LAND CONVERSION, CRIMINAL BREACH OF CONTRACT, AND CONSPIRACY TO DEFRAUD - ₦3,300,000

We are solicitors to the Petitioners, hereinafter referred to as —our clients, and on their behalf, we write to formally lodge this complaint against **PWAN Champion Realtors and Estates Limited**, operating through its subsidiary **PWAN Homes**, in relation to a joint land transaction executed at **Tehillah Gardens 1 Estate**, in 2016.

This petition concerns serious allegations of **fraud, misrepresentation, and wrongful denial or obstruction of validly purchased and contractually allocated land**, despite full compliance and documentation being in our clients' possession.

FACTUAL SUMMARY

1. In or about **March 2016**, our clients jointly purchased **two (2) commercial plots of land** at **Tehillah Gardens 1 Estate**, promoted and marketed by **PWAN Homes (under PWAN Champion Realtors and Estates Limited)**.
2. The advertised offer at the time was:
 - Pay the sum of **₦3,300,000** for two (2) commercial plots near the proposed Dangote Refinery area;
 - Receive **one (1) bonus residential plot** upon full payment — totaling **three (3) plots of land**.
3. Upon completion of payment, our clients were:
 - Issued a valid **payment receipt** by PWAN;
 - Given **physical allocation documents** detailing the exact plots;
 - Provided a signed **contract of sale** covering all three plots.
4. However, despite over **nine (9) years having passed**, attempts by our clients to **perfect documentation, confirm ownership, or process any further development or reselling of the land** have been persistently **stonewalled by PWAN**.
5. Company officials now **deny or frustrate recognition** of the original bonus plot, question the validity of physical allocation already granted, and have failed to honour their original contractual obligations.
6. These actions suggest **fraudulent intent to reclaim and resell the allocated land**, despite clear evidence of payment, contract, and allocation in favour of our clients.

CRIMINAL OFFENCES AND CONTRACTUAL BREACHES DISCLOSED

The conduct of PWAN and its officers reveals several breaches of both criminal and civil law, including:

- **Obtaining Property by False Pretence** – contrary to Section 1 of the *Advance Fee Fraud and Other Fraud Related Offences Act, 2006*;
- **Criminal Breach of Trust** – under Section 312 of the *Criminal Code Act*;
- **Conspiracy to Defraud** – under Section 516 of the *Criminal Code Act*;
- **Conversion or Attempted Conversion of Property** – under Section 383 & 390 of the *Criminal Code*;
- **Unfair Trade Practices / Suppression of Contractual Rights** – contrary to Section 14 of the *FCCPA 2019*.

PRAYERS

In light of the above, we respectfully seek the following redress:

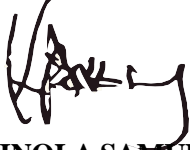
1. That your office initiates a full **criminal investigation** into the conduct of PWAN Champion Realtors and PWAN Homes over the handling of this transaction;
2. That **all culpable parties — including officials attempting to deny or reverse the allocation — be prosecuted** for fraud and criminal breach of contract;
3. That the full **ownership of the three (3) plots of land be upheld and reaffirmed**, with immediate issuance of perfected title documents with Governors Consent OR a compensation of 60 million naira for the 3 plots of land.

4. That **PWAN be compelled to cease any attempt to revoke, reallocate, or resell** the plots legally allocated to our clients;
5. That appropriate **damages or compensation** be awarded to our clients for harassment, delay, and the financial impact of the attempted land denial;
6. That your office conducts wider scrutiny of PWAN's land sales and **puts regulatory safeguards in place** to protect other investors.

We are prepared to provide copies of the **payment receipt, contract of sale, and allocation documents**, and will cooperate fully with your office in ensuring this matter is thoroughly investigated and justice is served.

Thank you for your urgent attention.

Yours faithfully,

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

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

CONTRACT OF SALE

BETWEEN

PWAN HOMES LTD
(THE VENDOR)

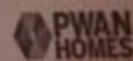
AND

[REDACTED]
(THE BUYER)

IN RESPECT OF TWO (2) COMMERCIAL PLOTS PLUS 1 PROMO PLOT OF LAND AT
TEHILLA GARDENS SITUATE ALONG AKODO ROAD, IBEJU-LEKKI LOCAL
GOVERNMENT AREA OF 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.
+2348060198680 or
01 453 4177





Floor 1 - 5 Plot Mall Building, Km 25, Lagos Epe Expressway
Opposite Leewood Hotel (See Centre)
Oko Adu, Ajah, Lagos State
☎ +234 1 2956848, +234 1 4534177, +234 1 4533669

[REDACTED]

Dear Valued Client,

PHYSICAL ALLOCATION NOTIFICATION

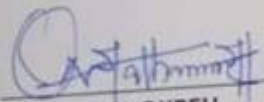
You are hereby notified of your allocation as follows:

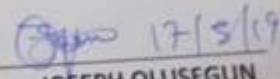
Estate Name: TEHILLA GARDENS LAGOS
No of Plots: 3 PLOTS
Plot Details: BLOCK E9 PLOT 16,17,18
Date of Allocation: 17th MAY, 2019

NB: This letter is temporary pending the receipt of your survey plan.
Subsequently, you are responsible for the clearing of your land after allocation.

Thanking you for choosing **PWAN HOMES**.

Yours faithfully,


NATHANIEL OKPEH
HEAD ADMIN


JOSEPH OLUSEGUN
GENERAL MANAGER



HEAD OFFICE: 1st Floor, Pwan Homes, 100, Oshodi Expressway, Oshodi, Lagos State, Lagos.
Tel: +234 1 2500000

REGA OFFICE: 1st Floor, Pwan Homes, 100, Oshodi Expressway, Oshodi, Lagos State, Lagos.
Tel: +234 1 2500000. Email: regal@pwanhomes.com

[REDACTED]

You are hereby notified of your allocation as follows:

Estate Name: TEHILLA GARDENS ESTATE LAGOS
No of Plots: 2 PLOTS
Plot Details: BLOCK D1 PLOT 14,15
Date of Allocation: 24TH FEBRUARY, 2018

Note that this letter is temporary pending the receipt of your survey plan.
Subsequently, you are responsible for the clearing of your land.
The free plot will be allocated to you on a later date.
Thanking you for confiding in us.
Yours faithfully,


EZUMEZU KENINA
AUTHORISED SIGNATORY


AFAM OKONKWO
AUTHORISED SIGNATORY

4. **THE VENDOR COVENANT WITH THE PURCHASERS** as follows:
1. To allocate **Two (2) Commercial Plots plus 1 Promo Plot** of Land to the purchasers at the time of allocation in **TEHILLA GARDENS** situate along Akodo Road, Ibeju-Lekki Local Government Area of Lagos State.
 2. To refund to the purchasers the total money paid less 10% administrative charges and 30% Agency Fee, if the Purchasers are no longer interested in the scheme at any time before taking full possession.
 3. The Vendor hereby indemnifies the Purchasers against loss (es) or adverse claim over the said **Two (2) Commercial Plots plus 1 Promo Plot** allocated to the Purchasers within the Scheme.
5. **THE PURCHASERS HEREBY COVENANTS WITH THE VENDOR** as follows:
- If the purchasers wish to withdraw from this scheme at any time:
- i. To give a notice of 90 days, and 60 days thereafter if the refund is not ready at the expiration of the 1st notice.
 - ii. An administrative charge of 10% and 30% Agency fee shall be deducted.
6. **IT IS HEREBY FURTHER** agreed that:
- a. The **PURCHASERS** have been briefed and are fully aware of the status of the land and have agreed to purchase the land as it is.
 - b. Both parties covenant to uphold these presents.


IN WITNESS WHEREOF, the Parties have hereto set their hands and sealed the day and year first above written.

THE COMMON SEAL of THE VENDOR is affixed

PWAN HOMES LTD

IN THE PRESENCE OF:


DIRECTOR

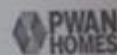

SECRETARY

SIGNED, SEALED AND DELIVERED

By the within

In the presence of:

Date: _____



THIS AGREEMENT is made this _____ day of _____ 2016
BETWEEN

PWAN HOMES LTD, a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its office at No. 6, Ogbe Street by Golden Park Estate, Ogbe, Surulere, Ajah, Lagos State (hereinafter referred to as **THE VENDOR**) which expression shall wherever the context so admits include its assigns, legal representatives and successors-in-title) of the one part.

AND

_____ AND MISS _____ (hereinafter referred to as **THE PURCHASERS**) whose expression shall wherever the context so admits include their heirs, assigns and legal representatives) of the other part.

WHEREAS:

1. The Vendor is a real estate Marketing and Investment Company engaged in the acquisition of tracts of land and development of estates which is laid out into schemes and gated estates and are thereafter allocated to Subscribers to the Schemes.
2. The Vendor has acquired a vast tract of land measuring **600 square meters** each situate and described as **TEHILLA GARDENS**.
3. The Vendor with intent to achieve its object of development of Schemes, has procured **TEHILLA GARDENS** hereinafter referred as 'the Scheme', whereby interested person (s) or organization subscribes to the Scheme by way of monthly, quarterly contribution or outright payment towards ownership of plot(s) of land within the Scheme.

IT IS HEREBY AGREED that the Purchasers have fully subscribed to **Two (2) Commercial Plots plus 1 Promo Plot** of land (measuring **600 square meters** each) and the Vendor shall allocate same within the Scheme to the Purchasers under the following terms and conditions:

1. The Purchasers have paid the purchase sum of **₦3, 300,000 (Three Million, Three Hundred Thousand Naira)** for the full subscription of the said **Two (2) Commercial Plots Plus 1 Promo Plot** of land at **TEHILLA GARDENS**, the receipt of which the Vendor hereby acknowledges.
2. The Purchasers shall contribute their proportionate share/cost of infrastructure and development levies to be communicated to subscribers at the appropriate time.
3. The Purchasers shall endorse and comply with the Rules and Regulation to the Scheme to be provided by the Vendor prior to during or after the allocation of the **Two (2) Commercial Plots plus 1 Promo Plot** within the Scheme.
4. The Vendor shall allocate the **Two (2) Commercial Plots plus 1 Promo Plot** of land within the Scheme as subscribed for by the Purchasers.
5. The Vendor shall from time to time make rules and regulations or issue directives towards the realization of the functionality of the Scheme.



PWANI HOMES

Real Estate & Property Development
 - Construction
 - Land Sales
 - Leasing

Sold to: [Redacted]
 Date: [Redacted]
 Receipt # [Redacted]
 File # [Redacted]

Payment Method: INSTANT
1 FREE FLOT ZENITH BANK PLC
2nd Slice 2 Description: Total Price: Interest: Time Total

Further Investment Payment for
 Two (2) plots of land at
 TEHULA GARDEN 1 Total: 2,000,000.00

Outstanding Balance: 190,000.00

Amount in words: Two Million Naira Only

Total Dividend

Subtotal: 2,000,000.00
 Sales Tax: 2,000,000.00
 Total: 2,000,000.00

FOR PWANI HOMES LTD:

Signature: _____

Received By:

Signature: _____



Contact Address: 6, Ogbeni Street, By Golden Park Estate, Ogidi, Sango, Aja, Lagos 10121000006. Email Address: pwanihomes@yahoo.com



HEAD OFFICE: No 6 Ogboni Street, THERA ANNEX, off Lekki Expressway Epe,
by Conrail Filling Station, beside Golden Park Estate, Ogboni, Ajah, Lagos. Lagos
Tel: +234 1 2956848
IKEREA OFFICE: 15A Sule Atade Close off Opebi Road by GTB, Opebi, Ikeja, Lagos
Tel: +234 1 2957206. Email: pwan@pwanhomes.com, info@pwanhomes.com

17th March, 2016

[REDACTED]
[REDACTED]
[REDACTED]
Dear Sir/Madam,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦1, 000,000 (One Million Naira)** only being part- payment for Two (2) plots measuring 600sqm of land each, in **TEHILLA GARDENS ESTATE**, along Akodo Road, Ibeju Lekki Local Government Area of Lagos State.

The total cost of the plot as at the date of this payment is **₦3, 000,000 (Three Million Naira)** only, for the Three months scheme.

The expected balance is **₦2, 000,000 (Two Million Naira)** only.

You are expected to pay the sum **₦1, 000,000 (One Million Naira)** monthly, before the end of every month, starting from the month of April, 2016 which is to offset the remaining balance of **₦2, 000,000 (Two Million Naira)** only.

Please go through the attached Frequently Asked Questions leaflet for more information.

Thank you very much for subscribing to **TEHILLA GARDENS ESTATE** through **PWAN Homes Ltd.**

Yours sincerely,

Emili Ajogwu (Barr)
FOR: PWAN Homes Ltd.