



**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 LEGEND VILLA OBA ANAMBRA FOR LAND SCAM – ₦3,500,000  
PAID WITHOUT ALLOCATION OR DELIVERY**

We write to lodge a formal **complaint and petition** against the promoters or sellers of **Legend Villa Estate, Oba, Anambra State**, for fraud, breach of trust, and criminal misrepresentation after collecting **₦3,500,000** from our client for land that was never delivered.

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**FACTS OF THE CASE:**

- In [insert exact date if available], the petitioner purchased **one plot of land** at **Legend Villa Estate, Oba, Anambra State**.
- A total sum of **₦3,500,000** was paid in full, as evidenced by the **attached Sales Receipt and Contract of Sale**.
- Since the payment was made, the petitioner has **received no allocation, no land, and no physical or legal access** to any property.
- All attempts to reach the promoters of the estate have failed. No meaningful response, refund, or rectification has been offered to date.
- This experience is consistent with a growing pattern of **real estate fraud** where land is marketed and sold to unsuspecting buyers with **no intention to allocate**.

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**APPLICABLE LEGAL BREACHES:**

The actions of the parties behind Legend Villa Estate constitute:

- **Advance Fee Fraud** – Taking money without providing the service promised (Section 419 of the Criminal Code).
  - **Criminal Breach of Trust** (Section 312 of the Criminal Code).
  - **Breach of Contract** – Failing to allocate land after valid contractual agreement.
  - **Obtaining Under False Pretenses** – Misleading the buyer with false assurances of land ownership and delivery.
  - **Violation of Consumer Protection Laws** under the **FCCPA (2019)**.
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## **RELIEFS SOUGHT:**


We respectfully request that your esteemed office:

1. **Investigate the promoters of Legend Villa Estate**, Oba, Anambra, for real estate fraud.
  2. **Compel a full refund** of the **₦3,500,000** paid by the petitioner.
  3. **Initiate criminal prosecution** for misrepresentation and breach of trust.
  4. **Blacklist the estate and its promoters** and issue consumer warnings to prevent further victimization.
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## **ATTACHED DOCUMENTS:**

- Sales Receipt
- Contract of Sale
- 

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the Alleged Petitioner*



Plot 11, Road 11, Villa Estate, Senior Mega Chicken,  
Juba Loko, 80-Chi, Lagos.  
☎ +234 81 888 885 52 / +234 81 888 887 36

20<sup>th</sup> APRIL 2021

Dear Sir,

**PAYMENT NOTIFICATION LETTER**

Sequel to the completion and receipt of your full Payment for One (1) Residential Plot of Land Measuring 464sqm at LEGEND VILLAS OSA, situated at OSA, Anambra state

Please find below the Payments Summary & Description of the Serviced Plot you purchased:

Full Payment for One (1) Residential Plot of Land Was Made 20<sup>th</sup> April 2021: NGN8,500,000.00  
TOTAL: NGN8,500,000.00

LOCATION: OSA, Anambra State

TYPE/SIZE: One (1) Residential Plot of Undeveloped Parcel of Land Measuring 464SQM

TITLE: Undeveloped Parcel of Land with Rural Registered Survey

You are kindly required to make the following payments:

1. Survey Plan Fee: N170,000.00 only per plot as the cost for your Registered Survey Plan to be made in your name.
2. Plot Demarcation Fee: N30,000.00 only per plot for your plot demarcation.
3. Deed of Assignment Fee: N500,000.00 only per plot for Legal and Signing fee for your Deed of Assignment
4. Development Fee: N8,500,000.00 only per plot which covers for infrastructures like: paved roads with gutters, perimeter fencing, recreational center/club house, security, gate house, street lights and green areas.

Payment shall be made into any Zenith Bank branch.

Account Name: PWANI LEGEND REALTORS & INVESTMENTS LTD | Account Number: 0015514937

Your Survey Copy 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 partnering with us to make home ownership dreams a reality for as many people as we possibly can.


Sincerely,

Dr. Michael Afam Okookwu  
MANAGING DIRECTOR  
PWANI LEGEND REALTORS & INVESTMENTS LTD.




## Fw: documents

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MUOXWE CHIOMA

In the presence of \_\_\_\_\_  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Occupation: \_\_\_\_\_



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THIS AGREEMENT is made this 20<sup>th</sup> day of APRIL 2021

BETWEEN

PWAN LEGEND REALTORS AND INVESTMENTS LTD a Limited Liability Company incorporated under the Laws of the Federal Republic of Nigeria with its office at House 11, Road 24, Ikota Villa Estate, Beside Mega Chicken, Lekki, 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

 hereinafter referred to as "THE \_\_\_\_\_" include his heirs, assigns and legal

wherever the context so admits include its assigns, legal representatives and successors-in-title) of the one part.

AND

[REDACTED] hereinafter referred to as 'THE [REDACTED]' include his 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 464 square meters each per plot situated and described as LEGEND VILLAS ESTATE OBA.
3. The Vendor with intent to achieve its objective of development of Schemes has procured LEGEND VILLAS OBA hereinafter referred to as 'The Scheme', whereby interested person(s) or organization(s) 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 Purchaser has fully subscribed to ONE (1) RESIDENTIAL PLOT OF LAND measuring 464sqm each per plot and the Vendor shall allocate same within the Scheme to the Purchaser under the following terms and conditions:

- a) The Purchaser has fully paid the purchase sum of N3,500,000.00 (Three Million Five Hundred Thousand Naira) for the full subscription of the said ONE (1) RESIDENTIAL PLOT OF LAND at LEGEND VILLAS OBA, the receipt of which the Vendor hereby acknowledges.  
The Purchaser shall bear the cost of the preparation of a Survey Plan in his name which shall be [REDACTED]
- b) The Purchaser shall contribute his proportionate share/cost of infrastructure and development levies to be communicated to subscribers at the appropriate time.
- c) The Purchaser shall endorse and comply with the Rules and Regulation of the Scheme to be provided by the Vendor prior to during or after the allocation of the ONE (1) RESIDENTIAL PLOT OF LAND within the Scheme.
- d) The Vendor shall allocate the ONE (1) RESIDENTIAL PLOT OF LAND within the Scheme as subscribed for by the Purchaser.
- e) The Vendor shall from time to time make rules and regulations or issue directives towards the realization of the functionality of the Scheme.



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Plot No 11, Road 14, Gated Villa Estate, Beside Mega Chicken,  
P.O. Box 100, Lagos.  
01-234 81 888 888 83, 01-234 81 888 887 36

20<sup>th</sup> APRIL 2021

Dear Sir,

**PAYMENT NOTIFICATION LETTER**

Sequel to the completion and receipt of your Full Payment for One (1) Residential Plot of Land Measuring 464sqm at LEGEND VILLAS OBA, situated at OBA, Anambra state

Please find below the Payments Summary & Description of the Serviced Plot you purchased:

Full Payment for One (1) Residential Plot of Land Was Made 20<sup>th</sup> April 2021: NGN3,500,000.00  
TOTAL: NGN3,500,000.00

LOCATION: OBA, Anambra State.

TYPE/SIZE: One (1) Residential Plot of Undeveloped Parcel of Land Measuring 464sqm.

TITLE: Undeveloped Parcel of Land with Rural Registered Survey

You are kindly required to make the following payments:

1. Survey Plan Fee: N170,000.00 only per plot as the cost for your Registered Survey Plan to be made in your name.
2. Plot Demarcation Fee: N30,000.00 only per plot for your plot demarcation.
3. Deed of Assignment Fee: N100,000.00 only per plot for Legal and Signing fee for your Deed of Assignment.
4. Development Fee: N3,500,000.00 only per plot which covers for infrastructures like paved roads with gutters, perimeter fencing, recreational center/club house, security gate house, street lights and green areas.



Delete



Reply



Forward



Move



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## CONTRACT OF SALE

BETWEEN

PWAN LEGEND REALTORS AND INVESTMENTS LTD  
(THE VENDOR)

AND

[REDACTED]  
(THE PURCHASER)

IN RESPECT OF ONE (1) RESIDENTIAL PLOT OF LAND AT LEGEND VILLAS ESTATE  
OBA SITUATED OBA, ANAMBRA.

OFF: 10TH STREET,  
IKEJA,  
LAGOS.



Page 1 of 3

4. THE VENDOR COVENANT WITH THE PURCHASER as follows:

- a. To allocate ONE (1) RESIDENTIAL PLOT OF LAND to the Purchaser at the time of allocation in LEGEND VILLAS ESTATE Oba situated at Oba, Anambra State.
- b. To refund to the Purchaser the total money paid less 10% administrative charges and 30% Agency Fee, if the PURCHASER is no longer interested in the scheme at any time before taking possession.
- c. The Vendor hereby indemnifies the Purchaser against loss(es) or adverse claim over the said ONE (1) RESIDENTIAL PLOT OF LAND allocated to the Purchaser within the Scheme.

5. THE PURCHASER HEREBY COVENANTS WITH THE VENDOR as follows:

- a. To pay for his Survey and legal fees in respect of the ONE (1) RESIDENTIAL PLOT OF LAND.
  - b. If the PURCHASER wishes to withdraw from this scheme at any time before taking possession:
    - i. To give a notice of 90 days, and 60 days thereafter if the refund is not ready at the expiration of the 1<sup>st</sup> notice.
    - ii. An administrative charge of 10% and 30% Agency fee shall be deducted.
6. IT IS HEREBY FURTHER agreed that:
- a. The PURCHASER has been briefed and is fully aware of the status of the land and has agreed to purchase the land as it is.
  - b. Both parties covenant to uphold these presents.

IN WITNESS WHEREOF, the Parties have here to set their hand and sealed this day and year first above written.

THE COMMON SEAL of THE VENDOR is affixed  
[Signature of PWAN LEGEND REALTORS AND INVESTMENTS LTD]

