



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 FOR FAILURE TO ALLOCATE LAND AND REFUND AFTER FULL PAYMENT FOR ₦6,055,000 (SIX MILLION, FIFTY-FIVE THOUSAND NAIRA)

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally petition **PWAN CHAMPION**, a subsidiary of the PWAN Group, for actions amounting to **fraud, breach of contract, and unlawful withholding of funds** in connection with the purchase of land that remains unallocated.

FACTS OF THE CASE:

On **May 15, 2023**, the petitioner made full payment totalling **₦6,055,000 (Six Million, Fifty-Five Thousand Naira)** to **PWAN CHAMPION** for the purchase of **a half plot of land** situated at **Legend Gardens Estate, Elesekan Bogije, Lagos State**.

Since the payment was completed, **no land has been allocated**, and the petitioner has made **multiple attempts to contact the agent and company representatives** to seek clarity and resolution. Each inquiry has been met with **false assurances, shifting timelines, and non-committal responses**.

As a result of the protracted delay and unfulfilled promises, the petitioner formally requested a **full refund**, but **PWAN CHAMPION has failed to honor this request**, neither refunding the amount paid nor allocating the property.

This situation has resulted in **emotional distress, financial hardship**, and a **total breach of contractual obligations** by the company.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN CHAMPION potentially violates:

- **Section 419 of the Criminal Code Act** – *Obtaining money under false pretences.*
- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – *Criminal breach of trust.*
- **Relevant consumer protection laws** – including the right to fair treatment, timely service delivery, and protection from deceptive marketing.

RELIEFS SOUGHT:

We respectfully request that your esteemed office:

1. **Investigate PWAN CHAMPION** for the deliberate non-allocation and failure to refund despite receiving full payment.
2. **Hold all responsible parties accountable**, including the company's agents, executives, and marketers involved in the transaction.
3. **Compel PWAN CHAMPION** to either:
 - Immediately allocate the agreed plot of land, **or**
 - Issue a **full refund with interest** to the petitioner for breach of contract and financial loss.
4. Ensure regulatory and legal measures are enforced to **prevent future occurrences** and protect other buyers.

ATTACHED DOCUMENTS:

- Payment receipt(s) for ₦6,055,000
- Communications with the agent and/or company representatives
- Request for refund correspondence

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



more than banking

Transaction Receipt

Generated from AccessMore on 15/05/23 12:31:27

Transaction Amount	N6,055,000
Transaction Type	INTER-BANK
Transaction Date	2023-05-15 12:31:21
Sender	[REDACTED]
Beneficiary	PWAN LEGEND REAL. AND INV. LTD(CAPITAL PROJECTS) 1015861446 Zenith Bank
Remark	



Sold to: [REDACTED]

May 15, 2023
[REDACTED]
[REDACTED]



House 11, Road 24, Ikota Villa Estate,
beside Mega Chicken, Ikota Lekki, Eti-Osa, Lagos
234818888861, +2348180000781

15th May, 2023

[REDACTED]
LAGOS STATE

Dear Sir,

PAYMENT NOTIFICATION LETTER

Sequel to the completion and receipt of your final payment for Half (1/2) Residential Plot of land at LEGEND GARDENS ESTATE, which is situated at Elesekan, Bogije, off Lekki-Epe Expressway Road, Ibeju-Lekki Local Government Area, Lagos State.

Please find below the description of the Land you purchased:

Full payment For Land was made 15th May 2023: NGN5,000,000.00
Full payment For Land Survey plan was made 15th May 2023: NGN190,000.00
Full payment For Land Deed of Assignment was made 15th May 2023: NGN100,000.00
Full payment For Land Development fee was made 15th May 2023: NGN750,000.00
Full payment For Land Plot Demarcation was made 15th May 2023: NGN15,000.00

TOTAL AMOUNT NGN: 6,055,000.00

LOCATION: Elesekan Bogije, Ibeju-Lekki Local Government Area of Lagos State.

TYPE/SIZE: Half (1/2) Plot of undeveloped parcel of land measuring 300sqm.

TITLE: Undeveloped parcel of Land Excised by Lagos State Government.

Your registered Survey Copies containing full details of your plots 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,





House 11, Road 24, Ikota Villa Estate,
beside Mega Chicken, Ikota Lekki, Eti-Oso, Lagos
234818888861, +2348180000781

PAYMENT RECEIPT

Sold to: [REDACTED] Date: May 15, 2023
Receipt #: [REDACTED]
File #: [REDACTED]

Payment Method	Reconciling Bank	Land Location	Duration		
OUTRIGHT	PWAN LEGEND - ZENITH BANK	LEGEND GARDEN			
Qty	Size	Description	Amount	Discount	Line Total
0.5	300 Sqm	Full Payment of half (1/2) plot of Residential Plot of Land at Legend Gardens Estate, Elesekan Bogije, Ibeju Lekki, Lagos.	NGN5,000,000.00	NGN0.00	5,000,000.00
0.5	300 Sqm	Full Payment for demarcation, Deed of Assignment, Survey Plan and Development Fee for half (1/2) plot of Residential Plot of Land at Legend Gardens Estate, Elesekan Bogije, Ibeju Lekki, Lagos.	NGN1,055,000.00	NGN0.00	1,055,000.00
Total Amount Paid: N6, 055,000					
Amount in words: Six Million Fifty-Five Thousand Naira Only.			Total Discount	NGN0.00	Subtotal 6,055,000.00 Sales Tax Total 6,055,000.00

FOR:
PWAN LEGEND
REALTORS AND INVESTMENTS LTD.



CONTRACT OF SALE

BETWEEN

PWAN LEGEND REALTORS AND INVESTMENTS LTD
(THE VENDOR)

AND

[REDACTED]
(THE PURCHASER)

IN RESPECT OF HALF (1/2) RESIDENTIAL PLOT OF LAND AT LEGEND GARDENS
ESTATE SITUATED AT ELESEKAN BOGIJE, OFF LEKKI-EPE EXPRESSWAY ROAD, IN
IBEJU-LEKKI LOCAL GOVERNMENT AREA OF LAGOS STATE.

PREPARED BY:

MANUEL NDUBUISI, ESQ.
OF THE LAW FIRM OF OLUKAYODE A. AKOMOLAFE
OLUFUNMILOLA OKIKIOLU STREET,
OFF TOYIN STREET,
Lagos