



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

PETITION AGAINST PWAN MAX, PWAN HOMES & MASS ASSET ESTATE FOR FAILURE TO ALLOCATE LAND AFTER FULL PAYMENT OF ₦1,950,000

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally petition **PWAN MAX, PWAN HOMES**, and **Mass Asset Estate** for breach of contract, misrepresentation, and suspected fraudulent land transactions.

FACTS OF THE CASE:

Between **2022 and 2024**, the petitioner purchased a total of **11 plots of land** from various subsidiaries under the PWAN Group as follows:

- **8 plots at Asaba Max Ville Phase 1 and Phase 2**, Umuedi Asaba, from **PWAN MAX**
- **2 plots at Flourish City Estate**, Ode Omi Phase 2, from **PWAN HOMES**
- **1 plot at Mass Asset Estate**, Utulu, Delta State

The total amount paid across these transactions was **₦1,950,000**, and all payments were completed as instructed by the respective companies.

Despite making full payment and following due process, the petitioner has **not received allocation** for any of the plots purchased. Repeated follow-ups, visits, and attempts to communicate have **not yielded any tangible outcome**.

APPLICABLE LEGAL BREACHES:

The actions and inactions of PWAN MAX, PWAN HOMES, and Mass Asset Estate may constitute:

- **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
- **Violation of consumer protection laws** – including failure to deliver paid-for services and lack of transparency

RELIEFS SOUGHT:

We respectfully request that your office:

1. **Launch a full investigation** into PWAN MAX, PWAN HOMES, and Mass Asset Estate regarding these non-allocated property schemes
2. **Compel a full refund** of **₦1,950,000** to the petitioner, including any applicable interest for undue delay
3. **Prosecute all culpable persons and entities** involved in this matter
4. **Issue public warnings** and take regulatory measures to prevent continued exploitation of unsuspecting Nigerians

ATTACHED DOCUMENTS:

- Payment receipts
- Sales and/or allocation documents (where available)
- Communications sent and received from the companies

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ
Principal Partner/Investor Partner

ELUYEFA CHAMBERS

SUCCESSFUL!

NGN 150,000.00

PM

PWAN MAX PROPERTY AND BUSINESS

Tuesday, 10 August 2021, 08:48 AM



BENEFICIARY ACCOUNT

0509546334



TRANSACTION TYPE

Other Local Banks Request



SENDER NAME

[REDACTED]

SUCCESSFUL!

NGN 100,000.00

PM

PWAN MAX PROPERTY AND BUSINESS
SOLUTIONS

Tuesday, 10 August 2021, 08:46 AM



BENEFICIARY ACCOUNT

4091342507



TRANSACTION TYPE

Other Local Banks Request



SENDER NAME

[REDACTED]

SUCCESSFUL!

NGN 50,000.00

PM

PWAN MAX PROPERTY AND BUSINESS

Wednesday, 04 August 2021, 03:58 PM



BENEFICIARY ACCOUNT

0509546334



TRANSACTION TYPE

Other Local Banks Request



SENDER NAME

[REDACTED]

SUCCESSFUL!

NGN 100,000.00

PM

PWAN MAX PROPERTY AND BUSINESS
SOLUTIONS

Wednesday, 04 August 2021, 11:14 AM



BENEFICIARY ACCOUNT

4091342507



TRANSACTION TYPE

Other Local Banks Request



SENDER NAME

[REDACTED]

SUCCESSFUL!

NGN 200,000.00

PM

PWAN MAX PROPERTY AND BUSINESS
SOLUTIONS

Thursday, 22 July 2021, 03:24 PM



BENEFICIARY ACCOUNT

4091342507



TRANSACTION TYPE

Other Local Banks Request



SENDER NAME

[REDACTED]

SUCCESSFUL!

NGN 420,000.00

PM

PWAN MAX PROPERTY AND BUSINESS
SOLUTIONS

Friday, 25 June 2021, 06:45 AM



BENEFICIARY ACCOUNT

4091342507



TRANSACTION TYPE

Other Local Banks Request



SENDER NAME



SUCCESSFUL!

NGN 80,000.00

PM

PWAN MAX PROPERTY AND BUSINESS
SOLUTIONS

Saturday, 19 June 2021, 07:41 AM



BENEFICIARY ACCOUNT

4091342507



TRANSACTION TYPE

Other Local Banks Request



SENDER NAME

[REDACTED]

SUCCESSFUL!

NGN 500,000.00

PM

PWAN MAX PROPERTY AND BUSINESS
SOLUTIONS

Sunday, 18 July 2021, 02:04 PM



BENEFICIARY ACCOUNT

4091342507



TRANSACTION TYPE

Other Local Banks Request



SENDER NAME

[REDACTED]



1st August, 2022

📍 Floor 1-5 Puri Mall Building, Km 25, Lekki Epe Expressway
Opposite Leawood Hotel (See Centre)
Oko Ado, Ajah, Lagos State
☎ +234-1-2956848, 234-14534177, 234-14533664

Dear Sir,

CONGRATULATORY & FREE PLOT ALLOCATION NOTIFICATION LETTER

Congratulations!

Due to your participation in our "NEW YEAR" PROMO RELOADED, the Management of **PWAN HOMES LIMITED** have awarded you a "Free" 300sqm Plot of land. We are pleased to inform you that your "free" 300 sqm plot of land shall be allocated to you in any of the vendor's Estates within Lagos State subject to the vendor's discretion and upon fulfilment of the understated conditions.

You are required to make the following payments:

1. **Provisional Survey Plan Fee:** To pay the sum of ₦50,000 only, per plot being the payment for your Provisional Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of ₦30,000 only, per plot for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of ₦100,000 only, per plot being the payment for your Deed of Assignment.
4. **Development Fee:** We would kindly advise you on the cost for the Development fee at a later date.

All Payment shall be made into any **Diamond Access Bank** branch. Account Name: **PWAN HOMES LTD CAPITAL PROJECT**, Account Number: **0047947873**.

Note that your provisional Survey Copies containing full details of your plot shall be made available to you after your physical allocation and confirmation of payment as indicated above.

NOTE ALSO (as part of the T&C for the promo) that failure to comply with the above stated conditions after a period of six (6) months from the date of receipt of this letter shall constitute a waiver/forfeiture of the free promo plots contained herein.

Thank you for partnering with us to make home ownership dream a reality.

Sincerely,



Ⓜ Floor 1-5 Puri Mall Building, Km 25, Lekki Epe Expressway
Opposite Leawood Hotel (See Centre)
Oko Ado, Ajah, Lagos State
☎ +234-1-2956848, 234-14534177, 234-14533664

1st August, 2022

Dear Sir,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment for **Two (2) Residential plots** of land at **FLOURISH CITY ESTATE ODE OMI PHASE 2** situate at Ode – Omi Area in Ibeju Lekki Local Government Area, Lagos State.

Please find below the description of the Land you purchased:

LOCATION: situate at Ode – Omi Area in Ibeju Lekki Local Government Area, Lagos State.

TYPE/SIZE: **Two (2) Residential plots** of undeveloped parcel of land measuring 600sqm each.

TITLE: Undeveloped parcel of Land with Survey & Deed of Assignment.

You are required to make the following payments:

1. **Provisional Survey Plan Fee:** To pay the sum of N50,000 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 N30,000 only per plot for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of N100,000 only per plot, being the payment for your Deed of Assignment.
4. **Development Fee:** We would advise you on the cost for the Development fee at a later date.


Payment shall be made into any **Diamond Access Bank** branch. Account Name: **PWAN HOMES LTD CAPITAL PROJECT**, Account Number: **0047947873**.


Building plans are to be submitted in 2D and 3D formats to **PWAN HOMES LTD** for consent and approval as we expect your constructions to be commenced as soon as possible.

Your provisional Survey Copies 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 for partnering with us to make home ownership dream a reality.

Sincerely,


Oluwatosin Oshobanjo Esq.
Legal Officer


Dr Julius Oyedemi
MD, CEO



HEAD OFFICE: Floor 1 to 5 R/R Mid Building, KM25, Lekki Epe Expressway, Opposite Lagos State University (LASU), Ojo, Lagos.
REGIONAL OFFICE: 16A, Sule Azuka Close, Off Opebi Road by GTB, Opebi, Ikeja, Lagos.
Tel: +234-12958848, +234-14533669
Email: info@pwanhomes.com

Sales Receipt

Sold To: [REDACTED]
[REDACTED] DELTA STATE

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

Payment Method	Reconciling Bank	Estate	Duration
Installment	057150013 - Zenith Bank Plc	Flourish City Estate Odeomi 2	3mths

Description	Line Total
Being final payment for 2.00 Plot(s) of [FCOD 2] Flourish City Estate Odeomi 2 - Free 300sqm (Discretionary Placement)	N 200,000.00
Amount in words: Two Hundred Thousand Naira and Zero Kobo Only	Subtotal N 200,000.00 Tax N 0.00 Total N 200,000.00

Additional Information

Total Amount: N 1,500,000.00
Outstanding Balance: N 0.00
Size per Plot: 600 Sqm

FOR PWAN Homes Ltd:

OLUOMA NZENWUGO

Signature





OJ AND MARC BUSINESS COMPLEX, KM 42
LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS
08180000652, 07064000761,

AUGUST 10TH 2021

██████████
██████████ A STATE.

Dear Sir/Ma,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment of **₦ 1,950, 000.00** only for **Three (3) Residential Plots of land** in **Max Ville Phase 2, situated at Admiralty Drive Umuedi, Asaba State.**

Please find below the description of the allocation:

LOCATION: Admiralty Drive Umuedi, Asaba State.

QUANTITY: Three (3) Residential Plots of undeveloped land measuring 464sqm, also including an extra free plot courtesy of Max Cap Promo.

TITLE: Undeveloped parcel of Land presently under customary ownership at the Ministry of lands, Asaba state.

You are required to make the following payments:

Survey Fee: To pay the sum of **₦ 150, 000** only per plot, being the payment for your Survey Plan to be made in your name.

Plot Demarcation Fee: To pay the sum of **₦30,000** only per plot for your plot demarcation.

Deed of Assignment Fee: To pay the sum of **₦100,000** only per plot for your Deed of Assignment.

Development Fee: To pay the sum of **₦500,000** only per plot for your Development Fee.

Payment shall be made into any **Guaranty Trust Bank** branch. Account Name: **PWAN MAX PROPERTY AND BUSINESS SOLUTION**, Account Number: **GTB: 0509546334**

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

Building plans are to be submitted in 2D and 3D formats to pwan Max for consent and approval as we expect your construction to be commenced as soon as possible

Thank you so very much for partnering with us to make home ownership dreams a reality for as many people as we possibly can.



OFFICE: Km42, Ikiki-Ese Expressway Opposite Children's Place Plaza,
By Alfa Bus Stop, Sangotedo, Ajah Loko, Lagos
Tel: +234-8180000652 • +234-8180000637
Email: ewanmaxproperties@gmail.com

Sales Receipt

Sold To: [REDACTED] LAGOS STATE
09067245554

Date: Aug 10, 2021
Receipt #: [REDACTED]
File #: [REDACTED]
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Polaris Bank Plc	3	Max Ville Phase 2, Asaba	6Mths

Description	Line Total	
Being Final payment for Three(3)plots of Land at Max Ville Phase 2, Asaba	N 100,000.00	
Amount in words: One Hundred Thousand Naira Only.	Subtotal	N 100,000.00
	Tax	N 0.00
	Total	N 100,000.00

Additional Information: Outright payment for Three(3)plots of Land at Max Ville Phase 2, Asaba, attracts one(1) free plot.

Total Amount: N 1,950,000.00
Outstanding Balance: N 0.00
Size per Plot: 4645sqm

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature


...making home ownership dreams a reality

www.pwanmax.com



OFFICE: Km42, Ikiki-Eke Expressway Opposite Children's Place Plaza.
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234-818000652, +234-818000637
Email: pwanmaxoverseas@gmail.com

Sales Receipt

Sold To

[REDACTED]
0907245359

Date: Aug 10, 2021

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Polaris Bank Plc	3	Max Ville Phase 2, Asaba	6Mths

Description	Line Total	
Being Final payment for Three(3)plots of Land at Max Ville Phase 2, Asaba	N 100,000.00	
Amount in words: One Hundred Thousand Naira Only.	Subtotal	N 100,000.00
	Tax	N 0.00
	Total	N 100,000.00
Additional Information: Outright payment for Three(3)plots of Land at Max Ville Phase 2, Asaba, attracts one(1) free plot.		
Total Amount:	N 1,950,000.00	
Outstanding Balance:	N 0.00	
Size per Plot:	4645qm	

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature


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OJ AND MARC BUSINESS COMPLEX, KM 42
LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS
08180000652, 07064000761,

AUGUST 10TH 2021

[REDACTED]
NO 13 OPIA STREET OKWE DELTA STATE.

Dear Sir/Ma,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment of **₦ 1,950, 000.00** only for **Three (3) Residential Plots of land in Max Ville Phase 2, situated at Admiralty Drive Umuedi, Asaba State.**

Please find below the description of the allocation:

LOCATION: Admiralty Drive Umuedi, Asaba State.

QUANTITY: Three (3) Residential Plots of undeveloped land measuring 464sqm, also including an extra free plot courtesy of Max Cap Promo.

TITLE: Undeveloped parcel of Land presently under customary ownership at the Ministry of lands, Asaba state.

You are required to make the following payments:

Survey Fee: To pay the sum of **₦ 150, 000** only per plot, being the payment for your Survey Plan to be made in your name.

Plot Demarcation Fee: To pay the sum of **₦30,000** only per plot for your plot demarcation.

Deed of Assignment Fee: To pay the sum of **₦100,000** only per plot for your Deed of Assignment.

Development Fee: To pay the sum of **₦500,000** only per plot for your Development Fee.

Payment shall be made into any **Guaranty Trust Bank** branch. Account Name: **PWAN MAX PROPERTY AND BUSINESS SOLUTION**, Account Number: **GTB: 0509546334**

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

Building plans are to be submitted in 2D and 3D formats to pwan Max for consent and approval as we expect your construction to be commenced as soon as possible



📍 OJ AND MARC BUSINESS COMPLEX, KM 42
LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS
☎ 08180000652, 07064000761,

AUGUST 10TH 2021



Dear Sir/Ma,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment of **₦ 1,950, 000.00** only for **Three (3) Residential Plots of land** in **Max Ville Phase 2**, situated at **Admiralty Drive Umuedi, Asaba State**.

Please find below the description of the allocation:

LOCATION: Admiralty Drive Umuedi, Asaba State.

QUANTITY: Three (3) Residential Plots of undeveloped land measuring 454sqm, also including an extra free plot courtesy of Max Cap Promo.

TITLE: Undeveloped parcel of Land presently under customary ownership at the Ministry of lands, Asaba state.

You are required to make the following payments:

Survey Fee: To pay the sum of **₦ 150, 000** only per plot, being the payment for your Survey Plan to be made in your name.

Plot Demarcation Fee: To pay the sum of **₦30,000** only per plot for your plot demarcation.

Deed of Assignment Fee: To pay the sum of **₦100,000** only per plot for your Deed of Assignment.

Development Fee: To pay the sum of **₦500,000** only per plot for your Development Fee.

Payment shall be made into any **Guaranty Trust Bank** branch. Account Name: **PWAN MAX PROPERTY AND BUSINESS SOLUTION**, Account Number: **GTB: 0509546334**

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

Building plans are to be submitted in 2D and 3D formats to pwan Max for consent and approval as we expect your construction to be commenced as soon as possible

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,