



**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

## **PETITION AGAINST PWAN MAX FOR FAILURE TO ALLOCATE LAND AFTER FULL PAYMENT OF ₦1,850,000**

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally petition **PWAN MAX** for failure to fulfill contractual obligations regarding the sale and allocation of land in **Epe, Lagos State**, after receiving full payment.

### **FACTS OF THE CASE:**

- On **07/12/2022**, the petitioner purchased **one plot of land** from **PWAN MAX** located in **Epe, Lagos State**.
- The total sum paid was **₦1,850,000**
- Despite fulfilling all financial obligations, **PWAN MAX failed to carry out any physical allocation** of the land.
- Repeated efforts by the petitioner to follow up with the company have **yielded no positive response or resolution**.

### **APPLICABLE LEGAL BREACHES:**

The conduct of PWAN MAX amounts to:

- **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** relating to fair service, delivery of paid products, and financial transparency

### **RELIEFS SOUGHT:**

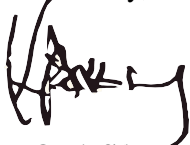
The petitioner respectfully requests:

1. An **immediate investigation** into PWAN MAX's operations regarding land sales and allocations
2. **Compulsory allocation** of the land or **a full refund of ₦1,850,000 with interest**
3. **Prosecution of responsible officers** for contractual and financial misconduct
4. Measures to ensure that **other consumers are protected** from similar fraudulent land schemes

### **ATTACHED DOCUMENTS:**

- Proof of payment **₦1,850,000**
- Any communication or documents received from PWAN MAX

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**  
*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*



OFFICE: 4th Flr, 4th Avenue, Opposite Children's Place Plaza,  
By Kibi Bus Stop, Sangrebo, Ash Lekki, Lagos  
Tel: +234 833880011 - +234 833880017  
Email: support@pwancorpn.com

## Sales Receipt

Sold To:

[REDACTED]

Date:

Mar 15, 2023

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estimate	Duration
Outright	Guaranty Trust Bank	1	22nd Assets Phase 2, Epe	3Mths
Description				Line Total
Being Final payment for One (1) Plot of Land at Max Assets Phase 2, Epe				N 250,000.00
Amount in words: Two Hundred Fifty Thousand Naira and Zero Kobo				Subtotal N 250,000.00
				Tax N 0.00
				Total N 250,000.00
Additional Information:				
Total Amount:		N 1,500,000.00		
Outstanding Balance:		N 0.00		
Size per Plot:		600sqm		

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature




OFFICE: No.22, Ikiki For Teenagers Opposite Children's Place Phase  
By Alfa Run 110p, Nargiside, Ajah Lagos  
Tel: +234-81-00000452 +234-81-00000457  
Email: [pwantmaxproperties@gmail.com](mailto:pwantmaxproperties@gmail.com)

## SURVEY FEE

Sold To: [REDACTED]  
07066188162


Date: May 29, 2023  
Receipt #: G1  
File #: P107  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Guaranty Trust Bank	1	Max Assets Phase 2, Epe	

Description	Line Total
Being payment for One(1)plot of Land at Max Assets Phase 2, Epe	N 150,000.00
Amount in words: One Hundred and Fifty Thousand Naira Only.	
	Subtotal N 150,000.00
	Tax N 0.00
	Total N 150,000.00

### Additional Information:

Total Amount: N 150,000.00  
Outstanding Balance: N 0.00  
Size per Plot: 6005qm

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature


...making home ownership dreams a reality

[www.pwanmax.com](http://www.pwanmax.com)



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

15<sup>th</sup> February, 2024

Dear Valued Client,

**PHYSICAL ALLOCATION UPDATE FOR MAX ASSETS EPE PHASE 2**

Greeting from PWAN Max Property and Business Solutions Limited

We hereby use this medium to congratulate you on your subscription to our Estate "Max Assets Epe Phase 2". We wish you success in your endeavors. Your loyalty has made our journey truly remarkable, and we truly appreciate your continued support throughout the years.

While we express our heartfelt gratitude to your kind self for choosing to purchase your property from us at Pwan Max, we appreciate your cooperation and patience with us since we embarked on this mutually beneficial relationship of making your home ownership dream a reality.

However, we apologize for the unintended delay in the allocation of your plot(s) in the estate as the delay has put your trust in us at stake and has made many to discontinue their relationships with us. We render our unreserved apologies for the inconveniences we have caused all of our esteemed clients over the year(s) as this was never our intention.

In this event, it is pertinent to update you as to the allocation of plots in the estates, in order to reassure you of our commitment towards a quick and reliable allocation of your plot(s) in the said estate **MAX ASSETS PHASE 2 EPE** being lying and situate at Epe L.G.A Lagos State. Thus, we crave your indulgence to please bear with us a little longer, as we work towards commencing physical allocation of your plots in April 2024 as all necessary plans are being put in place to ensure the commencement of this exercise. Kindly also bear in mind that allocation is also carried out in Batches and on first-come first-serve basis.

We wish to reiterate our commitment to the vision of making home ownership dream a reality of as many people as possible in Nigeria and Africa. Thank you for your magnanimous patience and understanding.

Yours Faithfully

**FOR: PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LIMITED**

# CONTRACT OF SALE OF LAND

BETWEEN

PWAN MAX PROPERTY AND BUSINESS SOLUTION LTD  
(VENDOR)

AND

[REDACTED]  
(PURCHASER)

1. IN RESPECT OF ALL THAT ONE PLOT OF LAND MEASURING 600 SQUARE METERS AT MAX ASSETS PHASE 2, ODOGBAWOJO VILLAGE, EPE, L.G.A, LAGOS STATE.

Prepared By:

PRINCE O. WILLIAMS-JOEL ESQ.  
FOR: PRINCE JOEL & ASSOCIATES  
LEGAL PRACTITIONERS,  
5ADOZEKCLOSE CHEVRON  
DRIVE

ZENITH BANK PLC

8578656

COUNTER CHEQUE

APPLICANT DETAILS - (DEBIT)

Account Name: [REDACTED]

E-mail Address: [REDACTED]

Amount in Words: [REDACTED]

BENEFICIARY DETAILS - (CREDIT)

1. Name: PWAN MAX PROPERTY & BUSINESS

Bank Name (Transfers Only): GT BANK

Account Number: [REDACTED]

Amount (N): [REDACTED]

2. Name: [REDACTED]

Bank Name (Transfers Only): [REDACTED]

Account Number: [REDACTED]

Amount (N): [REDACTED]

3. Name: [REDACTED]

Bank Name (Transfers Only): [REDACTED]

Account Number: [REDACTED]

Amount (N): [REDACTED]

Payment Location - (LMT Only): [REDACTED]

Name of Representative to pick MC (LMT Only): [REDACTED]

Means of Identification - (LMT Only)

Drivers Licence [ ] International Passport [ ] National ID [ ]

Others (Please specify): [REDACTED]

Test Question - (LMT Only): [REDACTED]

Test Answer - (LMT Only): [REDACTED]

I confirm the above details are accurate and the bank is hereby authorized to pay cash/effect transfer/issue MC and apply charges accordingly.

Account Holder's Signature: [REDACTED]

FOR BANK USE ONLY (CASH)

Transaction Value: [REDACTED]

Commission: [REDACTED]

VAT: [REDACTED]

TOTAL: [REDACTED]

RTB: [REDACTED]

CHECKED BY: [REDACTED]

AUTHORISED BY: [REDACTED]



**ZENITH BANK** NIP Transfer Receipt

Transaction Date: 13/03/2023 1:27:25 PM

Beneficiary: PWAN MAX PROPERTY AND BUSINESS-0509546334  
Beneficiary's Bank: GUARANTY TRUST BANK PLC  
Amount: 250,000.00  
Description: NIP CR/PWAN MAX PROPERTY AND BUSINESS/GTB/D  
Payer: [REDACTED] -2085330418  
Session ID: 000015230313132724299937002237  
Mode Of Payment: BANK TELLER

Copy

Select All

Look Up



Transaction Date: 13/03/2023 1:27:25 PM

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