



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 GROUP FOR FAILURE TO ALLOCATE LAND
DESPITE RECEIVING AN AMOUNT TO THE SUM OF ₦ 3,500,000**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, specifically **PWAN Max**, over its failure to allocate land as promised and documented since 2022.

FACTS OF THE CASE:

1. In 2022, the alleged petitioner paid for a plot of land from **PWAN Max Oba**.
2. Following the payment, the petitioner was issued a **Contract of Sale** and a **Physical Allocation Letter**, which was given by the chairman of the company.
3. Upon receiving a notice for physical allocation, the petitioner reached out to the relevant PWAN Max branch office on the appointed date.
4. Shockingly, the branch staff denied any knowledge or instruction from the chairman concerning the allocation and stated that **no such exercise was scheduled or authorized**.
5. Since then, **no allocation has occurred**, and the conflicting statements between PWAN Max representatives have caused distress, confusion, and loss of confidence in the company.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN Max and its representatives may violate the following provisions under Nigerian law:

1. **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust.
2. **Section 419 of the Criminal Code Act** – Obtaining property under false pretences.
3. **Federal Competition and Consumer Protection Act (FCCPA)** – For failure to honor contractual obligations and provide fair treatment to customers.

RELIEFS SOUGHT:

We respectfully request that your office:

1. **Investigate PWAN Max and its officers** for breach of contract and misleading practices.
2. **Prosecute all responsible parties** for deceptive conduct and breach of trust.
3. **Compel allocation of the land paid for or refund the total amount with accrued interest.**
4. **Impose regulatory sanctions** to prevent further occurrences of such acts that harm consumers and undermine public trust.

ATTACHED DOCUMENTS:

Find attached

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



MAR 11TH, 2024

[REDACTED]
[REDACTED]
[REDACTED] Client,

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: PERIDOT, OBA
No of Plots: ONE (1) PLOT
Type of Plot: RESIDENTIAL
Size: 500SQM
Plot Details: BLOCK C, PLOT 13
Date of Allocation: 4TH MAY, 2024

NB: This letter is **ONLY** authenticated upon the receipt of your survey plan, Payment of your Deed of Assignment and payment of your development fees respectively for your subscribed Plot(s).

Subsequently, you are responsible for the clearing of your land after allocation if you have not started building. However, we want to encourage you to start building so that the development of the estate will be fast.

Take note that we have free building plans that can help you with your building at market friendly prices. Kindly get back to our Customer Service department for how to start your building.

Thank you for choosing **PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LIMITED**.

Sincerely,

CHIKA CHUKWULOZIE
SECRETARY

EGBUNIKE FRANCISCA
HOD, ADMIN



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

JULY 22, 2023.

[REDACTED]

Dear Sir/Ma,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment of **₦ 3,500,000.00 (Three Million, Five Hundred Thousand Naira)** only, being payment for One (1) Residential plot of land in **PERIDOT, OBA** situated at ugbo okpuno etiti/umuafa village of aborji oba idemili south, Anambra State.

Please find below the description of the allocation:

LOCATION: Oba, Anambra State.

SIZE: One (1) Residential plot of undeveloped land measuring 500Sqm.

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

We also acknowledge that you are entitled to an-inclusive package (Free documentation fees)

You are required to make the following payments:

Development Fee: The price for the development fee will be determined later

Payment for Development fee shall be made into any **Polaris Bank Branch, Account Name: Pwan Max Construction and Building Company, Account Number; 4091402258.**

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,

NWAIGWE FRANKLIN
GENERAL MANAGER

EGBUNIKE FRANCISCA
HOD, ADMIN

info@pwanmax.com, pwanmaxproperties@gmail.com

www.pwanmax.com