



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 [REAL ESTATE COMPANY NAME] FOR LAND FRAUD AND NON-ALLOCATION – ₦1,280,000 TOTAL LOSS

We write to formally lodge a petition against PWAN GROUP for **fraudulent land sale, non-allocation, and breach of trust** after collecting a total of **₦1,280,000** from our client with no land delivered to date.

FACTS OF THE CASE:

- In [Insert Year], the petitioner paid **₦1,000,000** for a **plot of land**, for which only a **receipt of payment** was issued. No contract of sale or allocation letter was provided.
- Subsequently, the petitioner made an **additional payment of ₦280,000** to the same party — possibly for documentation, further allocation, or associated land services.
- The **total sum of ₦1,280,000** was paid in good faith, but **no land, no allocation, and no documentation** have been provided since then.
- The petitioner has made several attempts to follow up, visit offices, and demand delivery — but all have been unsuccessful.
- To date, there has been **no refund, no land, and no valid explanation**, raising serious concerns of fraud and criminal intent.

APPLICABLE LEGAL BREACHES:

The actions of the parties involved amount to:

- **Advance Fee Fraud** under Section 419 of the Nigerian Criminal Code
 - **Criminal Breach of Trust** – Section 312
 - **Misrepresentation and Deceptive Conduct** – Section 14, FCCPA (2019)
 - **Breach of Contract** – For failing to deliver the land agreed upon
-

RELIEFS SOUGHT:

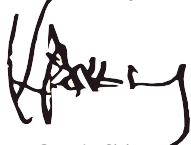
We respectfully request that the appropriate authorities:

1. **Investigate the promoters of the land scheme** for real estate fraud.
 2. **Compel full allocation** of the paid-for plot(s) with proper documentation OR
 3. **Order a refund of the full ₦1,280,000** paid by the petitioner, with interest and penalties.
 4. **Initiate prosecution** where applicable and **sanction the company** for consumer fraud.
-

ATTACHED DOCUMENTS:

- Payment Receipt for ₦1,000,000
- Payment Proof for the additional ₦280,000
-

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



OFFICE: KNAF, 14th Floor, Enclave One, Oshodi, Lagos
P.O. Box 114, Lagos, Nigeria
Tel: +234 8100000000, +234 8100000000
Email: pwancustomer@pwanmax.com

SURVEY FEE

Sold To

Date: Oct 20, 2023
Receipt #: UBA/2023/0001
File #: PMA/NAVTH2/2023/0001
Comment:

Payment Method	Reconciling Bank	Quantity	Estimate	Duration
Outright	United Bank of Africa	1	Max Villa Phase 2, Asaba	
Description				Line Total
Bring payment for One(1)plot of Land at Max Villa Phase 2, Asaba				N 150,000.00
Amount in words: One Hundred Fifty Thousand Naira and Zero Kobo				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: 664sqm				

FOR PWAN Max Properties and Business Solution

OYEYEM QUAMDEEN

Signature

...making home ownership dreams a reality

0810 2163 0718, 0201



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P.O. Box 114, Lagos, Nigeria
Tel: +234 8100000000, +234 8100000000
Email: pwancustomer@pwanmax.com

PLOT DEMARCATION

Sold To

Date: Oct 20, 2023
Receipt #: UBA/2023/0001
File #: PMA/NAVTH2/2023/0001
Comment:

Payment Method	Reconciling Bank	Quantity	Estimate	Duration
Outright	United Bank of Africa	1	Max Villa Phase 2, Asaba	
Description				Line Total
Bring payment for One(1)plot of Land at Max Villa Phase 2, Asaba				N 30,000.00
Amount in words: Thirty Thousand Naira and Zero Kobo				Subtotal N 30,000.00 Tax N 0.00 Total N 30,000.00
Additional Information:				
Total Amount: N 30,000.00				
Outstanding Balance: N 0.00				
Size per Plot: 664sqm				

FOR PWAN Max Properties and Business Solution

OYEYEM QUAMDEEN

Signature



09422 KHALI 1040 One Bedroom Onebath Children's Place Phase
By 470 Bus Stop, Ikeja, Lagos, Lagos State, Nigeria
Tel: +234 8088888822, +234 8088888827
Email: pwanmax@pwanmax.com

Deed of Assignment

Sold To:



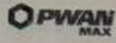
Date: Oct 20, 2023
Receipt #: UBA/2023/0001
File #: PWA/MPH2/2023/00063
Comment:

Payment Method	Reconciling Bank	Quantity	Starts	Duration
Outright	United Bank of Africa	1	Max Villa Phase 2, Asaba	
Description				Line Total
Being payment for One(1)plot of Land at Max Villa Phase 2, Asaba				N 100,000.00
Amount in words: One Hundred Thousand Naira and Zero Kobo				Subtotal N 100,000.00 Tax N 0.00 Total N 100,000.00
Total Amount: N 100,000.00				
Outstanding Balance: N 0.00				
Size per plot: 864sqm				

FOR PWAN Max Properties and Business Solution
OYIYEMI QUAMDEEN
Signature

- making home ownership dreams a reality

www.pwanmax.com



OFFICE: Km42, Ibeju-Lekki Expressway Opposite Children's Place Plaza,
By Aite Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234-810000652 +234-8180000637
Email: pwanmax@rediffmail.com

Sales Receipt

Sold To

08032113472

Date: Aug 4, 2021
Receipt #: UBA/2021/0003
File #: PMX/MVA/2021/00175
Comment:

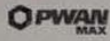
Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Ville, Asaba	3Mths

Description	Line Total
Being Final payment for One(1)plot of Land at Max Ville, Asaba	N 220,000.00
Amount in words: Two Hundred and Twenty Thousand Naira Only.	
	Subtotal N 220,000.00
	Tax N 0.00
	Total N 220,000.00

Additional Information:	
Total Amount:	N 1,000,000.00
Outstanding Balance:	N 0.00
Size per Plot:	4645qm

FOR PWAN Max Properties and Business Solution	
Habeeb Sherifdeen	
Signature	
Sign	
Date	





OFFICE: Km41, Ibeju-Lekki Expressway Opposite Children's Place Plaza,
By ATO Bus Stop, Ibeju-Lekki, Ajah LGA, Lagos
Tel: +234-8180000652, +234-8180000637
Email: pwancare@pwansolutions.com

Sales Receipt

Sold To: [REDACTED]

08032119472

Date: May 4, 2021
Receipt #: UBA/2021/0001
File #: PMX/MVA/2021/00175
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Ville, Asaba	3Mths
Description				Line Total
Being Initial payment for One (1) plot of land at Max Ville, Asaba				N 500,000.00
Amount in words: Five Hundred Thousand Naira Only.				
				Subtotal
				Tax
				Total
				N 500,000.00
				N 0.00
				N 500,000.00
Additional Information:				
Total Amount:		N 1,000,000.00		
Outstanding Balance:		N 500,000.00		
Size per Plot:		4645sqm		

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature: _____
Sign: _____
Date: _____

Sold To

Sales Receipt

08032113472

Date: Jul 14, 2021
Receipt #: UBA/2021/0002
File #: PMX/MVA/2021/00175
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Ville, Asaba	3Mths
Description				
Being Further payment for One(1) plot of Land at Max Ville, Asaba				Line Total
				N 280,000.00
Amount in words: Two Hundred and Eighty Thousand Naira Only.				
				Subtotal
				N 280,000.00
				Tax
				N 0.00
				Total
				N 280,000.00
Additional Information:				
Total Amount: N 1,000,000.00				
Outstanding Balance: N 220,000.00				
Size per Plot: 4645qm				

FOR PWAN Max Properties and Business Solution	
Habeb Sherifden	
Signature	

