



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 MAX (MAX WATERS, ODE OMI OKUN ISEKUN, IBEJU-LEKKI) FOR FRAUD, NON-ALLOCATION, CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD – ₦550,000

We are solicitors to the Petitioner, hereinafter referred to as “*our client*,” and on their behalf, we respectfully submit this formal criminal complaint against **PWAN MAX**, a subsidiary under the **PWAN Group**, for acts constituting fraud, non-allocation of land, criminal breach of trust, and conspiracy to defraud.

FACTUAL SUMMARY

1. In **2021**, our client purchased **one (1)** residential plot of land at **Max Waters Estate, Ode Omi Okun Isekun**, Ibeju-Lekki, from PWAN MAX, for a total sum of **₦550,000** (Five Hundred and Fifty Thousand Naira).
2. Since payment was made in full, our client has made multiple attempts over a span of **four (4)** **years** to secure physical allocation of the purchased plot.

3. Despite repeated visits to PWAN MAX's office at Sangotedo, our client has received no satisfactory response. The staff continually make excuses, claiming that the realtor or manager is unavailable.
4. Calls and written follow-ups have gone unanswered, and no meaningful step has been taken by PWAN MAX to either allocate the land or refund the purchase price.
5. Realising the evasiveness and deliberate delay, our client formally requested a refund, which has been ignored to date.

CRIMINAL OFFENCES DISCLOSED

The conduct of PWAN MAX and its responsible officers discloses multiple breaches of Nigerian criminal and consumer protection laws, including:

- **Advance Fee Fraud and Obtaining by False Pretence** – contrary to Section 1(1)(a) & (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006;
- **Criminal Breach of Trust** – contrary to Section 312 of the Criminal Code Act;
- **Conspiracy to Defraud** – contrary to Section 516 of the Criminal Code Act;
- **Unfair Business Conduct and Misrepresentation** – contrary to Section 14 of the Federal Competition and Consumer Protection Act (FCCPA), 2019;
- **Cheating** – contrary to Section 421 of the Penal Code (where applicable).

PRAYERS

In view of the foregoing, we respectfully seek the following reliefs:

1. That your office immediately opens a criminal investigation into PWAN MAX and its officers responsible.
2. That prosecution be instituted against any individuals found culpable of fraud, misrepresentation, and breach of trust.
3. That PWAN MAX be compelled to either:
 - Allocate the purchased plot of land at **Max Waters Estate, Ode Omi Okun Isekun** without further delay; **or**
 - Refund the total amount of **₦550,000** with applicable interest and compensation.
4. That the company be directed to compensate our client for financial loss, emotional distress, and inconvenience suffered due to the deliberate non-allocation.
5. That regulators and enforcement agencies place strict monitoring on PWAN MAX's land sales and block any future sales until all outstanding obligations are met.

Our client is ready to provide proof of payment, correspondence, and any supporting documents to aid your investigation.

Thank you for your urgent consideration of this matter.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner

