ELUYEFA CHAMBERS



No. 22 Admiralty Way, Lekki Phase 1

07077513836

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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 GROUP (PWAN PRO & PWAN MAX ASSETS) FOR FAILURE TO ALLOCATE LAND DESPITE THE \$\frac{1}{2}700,000 FULL PAYMENT

We write on behalf of our client (hereinafter referred to as "the alleged petitioner") to formally petition **PWAN Group**, and more specifically its subsidiaries **PWAN PRO** and **PWAN MAX ASSETS**, over non-allocation of land despite full payment for plots purchased over **three years ago**.

FACTS OF THE CASE:

- 1. The petitioner purchased:
 - Two (2) plots of land in Benin City from PWAN PRO, and
 - Two (2) plots of land in Lagos from PWAN MAX ASSETS, a subsidiary of PWAN Group.
- 2. The total amount paid was duly acknowledged by the respective companies. Attached to this petition are:
 - o Contract of Sale
 - Sales Receipt
 - Letter of Acknowledgment
- 3. Despite these documents confirming the purchase, **no land has been allocated**, and multiple follow-ups by the petitioner have been either ignored or met with excuses and delays.

4. The actions and inactions of PWAN PRO and PWAN MAX ASSETS amount to a **breach of trust, breach of contract, and possibly fraudulent misappropriation of funds**.

APPLICABLE LEGAL BREACHES:

These actions violate key provisions of Nigerian law, including:

- 1. **Section 419 of the Criminal Code Act** which prohibits obtaining property by false pretences.
- 2. Section 312 of the Criminal Code Act, Cap C38, LFN 2004 criminal breach of trust.
- 3. **Dishonest service delivery practices** under consumer protection laws and relevant real estate regulatory frameworks.

RELIEFS SOUGHT:

We respectfully request that your esteemed office:

- 1. **Launch a formal investigation** into PWAN PRO and PWAN MAX ASSETS for breach of agreement and suspected land fraud.
- 2. **Prosecute any individuals** found to have engaged in criminal deceit or misappropriation.
- 3. **Compel a full refund** of the petitioner's payments **with interest** for the unjustified delay and emotional hardship.
- 4. **Take regulatory action** against the parent company (PWAN Group) to prevent further victimization of unsuspecting citizens.

ATTACHED DOCUMENTS:

- Contract of Sale
- Sales Receipt
- Letter of Acknowledgment (Additional proof and communication records can be provided upon request)

We trust that this petition will receive urgent and appropriate action in accordance with the Commission's mandate to protect citizens from financial and economic crimes.

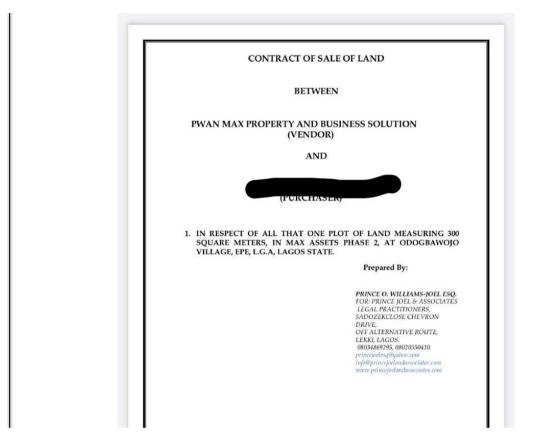
Yours faithfully

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner





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



Dear Sir,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment of N750,000.00(Seven Hundred and Fifty Thousand Naira) only for One (1) Residential Plot of land in Max Assets Phase 2 Epe, located at Odogbawojo Village, Epe Lagos State.

Please find below the description of the allocation:

LOCATION: Odogbawojo Village, Epe, Lagos State

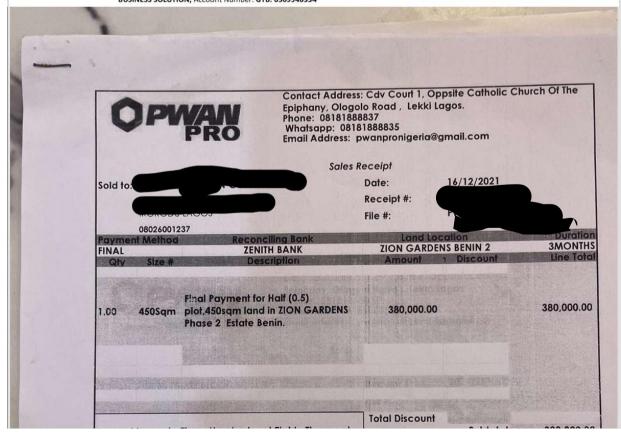
QUANTITY: One (1) Residential Plot of Undeveloped land measuring 300sqm.

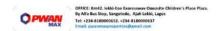
TITLE: Undeveloped parcel of Land presently under customary ownership at the Ministry of lands, Lagos State.

You are required to make the following payments:

- Survey Fee: To pay the sum of N 150, 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 N30,000.00 plot for your plot demarcation.
- 3. Deed of Assignment Fee: To pay the sum of №100,000 only per plot for your Deed of Assignment.
- 4. Development Fee: To pay the sum of N500,000 only per plot for your Development Fee.

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







Payment Method		Reconciling Bank	Quantity	Estate	Duration
				Max Assets	
Outright		United Bank of Africa	1	Phase2,Epe	3Mths
Description					Line Total
Being Initial payment for One	(1)plot of Land at Max A	ssets Phase2,Epe.			N 100,000.00
Amount in words: One I	Hundred Thousand Nair	ra and Zero Kobo		Subto	
				United States	ax № 0.00
				То	tal N 100,000.00
Additional Information;					
Total Amount:	N 1,500,000.	00			
Outstanding Balance:	N 1,400,000.	00			
Size per Plot:	600Sam				

Habeeb Sherifdeen	
Signature	
11/	
- the	



- OJ AND MARC BUSINESS COMPLEX, KM 42
 LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S
 PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS
- **6** 08180000652, 07064000761,



Dear Sir/Ma,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of ¥100,000.00(One Hundred Thousand Naira) only, being Initial-payment for One (1) Residential plot of land measuring 600sqm, in MAX ASSETS PHASE 2,EPE, situated at Odogbawojo Village Epe ,Lagos State.

The total cost of the plot as at the date of this payment is \$1,500,000.00 (One Million, Five Hundred Thousand Naira) only, for the Three months scheme.

The expected balance is **¥ 1, 400,000.00 (One Million, Four Hundred Thousand Naira)** only.

You are expected to pay ₦ 700,000.00 (Seven Hundred Thousand Naira) monthly, before the end of two Months Starting from the month of December 2021, which is to offset the remaining balance of ₦ 1, 400,000.00 (One Million, Four Hundred Thousand Naira) only.

(Note that any default in your payment shall attract extra charges).

Thank you very much for subscribing to MAX ASSETS PHASE 2, EPE through PWAN Max Property and Business Solution.



CDV Court 1, Opposite Catholic Church of the Epiphany Ologolo Road, Lekki Peninsula Phase 2, Lekki Lawa

08181888837

16TH DECEMBER, 2021



Dear Sir,

PAYMENT NOTIFICATION LETTER

Sequel to your final payment of #380,000.00 (Three Hundred and Eighty Thousand Naira) which makes it a total of N1,080,000.00 (One Million Eighty Thousand Naira) for Half (0.5) Residential Plot of Land at Zion Gardens 2 situate at Eghobaye Community off Sapele Road, Benin City, Edo State.

Please find below the description of the Land (s) you purchased:

LOCATION: Eghobaye Community off Sapele Road, Benin City, Edo State.

TYPE/SIZE: Half (0.5) Residential Plot of undeveloped parcel of Land measuring 450sqm.

TITLE: Deed of Assignment and Survey

You are required to make the following payments:

- Provisional Survey Plan Fee: To pay the sum of \$\mathbb{\text{N}}\$50,000 only, being the cost for your Provisional Survey Plan to be made in your name.
- 2. Plot Demarcation Fee: To pay the sum of \$\\$30,000 only, for your plot demarcation.

