



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 GROUP (MAX GARDENS, ODEOMI) FOR FRAUD, NON-ALLOCATION,
CRIMINAL BREACH OF TRUST, AND CONSPIRACY TO DEFRAUD - ₦4,505,000**

We are solicitors to the Petitioner, hereinafter referred to as “our client,” and on her behalf, we respectfully submit this formal criminal complaint against **PWAN Group**, and in particular, its subsidiary responsible for the management and sale of **Max Gardens, Odeomi, Ebute Okun Abakeeta Community, Ibeju-Lekki, Lagos State**.

This complaint concerns repeated acts of deception, breach of trust, and unlawful withholding of land despite full payment and the passage of over three years.

FACTUAL SUMMARY

1. Over **three years ago**, our client purchased **five (5) residential plots** of land at **Max Gardens, Odeomi, Ibeju-Lekki**, each measuring **600 square meters**, from PWAN Group.

2. Based on the promotional offer at the time, she was also **promised one (1) additional plot for free**, bringing the total number of plots to six.
3. Our client proceeded to pay the total sum of **₦4,505,000 (Four Million, Five Hundred and Five Thousand Naira)** which covered the cost of the land, documentation fees, and all required charges including:
 - Land payment
 - Survey plan fees
 - Deed of assignment
 - Allocation and other administrative fees
4. Despite full and timely payment of all applicable dues and a series of follow-ups by our client and her representatives, **no physical allocation has been carried out to date**, and no valid land documentation has been issued by PWAN.
5. The company's representatives have **consistently given excuses**, promised future allocation dates, and later failed to honour them. Some staff even stopped taking calls or responding to written communications entirely.
6. This extended delay—spanning over **three years**—has caused our client **grave financial loss, emotional distress, and undermined her investment expectations**, despite her full compliance with all terms.

CRIMINAL OFFENCES DISCLOSED

The conduct of **PWAN Group** and its responsible agents discloses multiple violations 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 light of the foregoing, we respectfully seek the following reliefs:

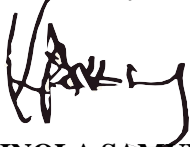
1. That your office immediately **initiates a thorough criminal investigation** into the actions of **PWAN Group** and the officers involved;
2. That **prosecution be commenced** against any individuals found culpable for fraud, misrepresentation, and breach of trust;
3. That PWAN Group be compelled to either:
 - **Allocate all six (6) plots of land** as agreed (five purchased and one bonus plot); **or**
 - **Refund the full amount of ₦4,505,000** to our client with applicable interest and compensation;
4. That the company be ordered to **compensate our client** for financial hardship, emotional trauma, and delay in realizing her investment;

5. That regulatory and enforcement authorities place **strict monitoring** on PWAN Group's land sales and block further unallocated land offerings until all pending obligations are met.

We are prepared to present supporting documentation including payment receipts, correspondence, and sworn affidavits, and shall cooperate fully in your investigation and enforcement.

Thank you for your attention to this urgent complaint.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Akinola Samuel Eluyefa', written in a cursive, stylized script.

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



OFFICE: Km42, Lekki-Epe Expressway Opposite Children's Place Plaza.
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234-8180000652, +234-8180000637
Email: pwanmaxproperties@gmail.com

Sales Receipt

Sold

Date:
Receipt #:
File #:
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	5	Max Gardens, Odeomi	6Mths

Description	Line Total	
Being Further payment for Five(5) plots of Land at Max Gardens, Odeomi.	N 2,000,000.00	
Amount in words: Two Million Naira Only.	Subtotal	N 2,000,000.00
	Tax	N 0.00
	Total	N 2,000,000.00
Additional Information: Outright payment for Five(5)plots of land at Max Gardens, Odeomi, attracts One(1)free plot.		
Additional Information: Two(2) Commercial plots attracts 10% of land cost.		
Additional Information: One(1) Corner piece plot attracts 10% of land cost.		
Total Amount:	N 4,505,000.00	
Outstanding Balance:	N 455,000.00	
Size per Plot:	6005sqm	

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature




OFFICE: Km42, Ibeju-Lekki Expressway Opposite Children's Place Plaza,
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234-8180000652, +234-8180000637
Email: pwanmaxproperties@gmail.com

Sales Receipt

Sold To

Date:

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	5	Max Gardens, Odeomi	6Mths

Description	Line Total
Being Further payment for Five(5) plots of Land at Max Gardens, Odeomi.	N 1,000,000.00
Amount in words: One Million Naira Only.	
	Subtotal N 1,000,000.00
	Tax N 0.00
	Total N 1,000,000.00

Additional Information: Outright payment for Five(5)plots of land at Max Gardens, Odeomi, attracts One(1)free plot.

Additional Information: Two(2) Commercial plots attracts 10% of land cost.

Additional Information: One(1) Corner piece plot attracts 10% of land cost.

Total Amount: N 4,505,000.00
Outstanding Balance: N 2,455,000.00
Size per Plot: 600Sqm

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature




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



8180000652, 07064000761.

Dear Sir/Ma,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment for **Five (5) Residential amidst Two Commercial plots with one Corner Piece** Plot of land in Max Gardens at Odeomi, Ebute Okun Abakeeta Community, Ibeju Lekki, Lagos State.

Please find below the description of the allocation:

LOCATION: Odeomi, Okun Abekeeta Community, Ibeju Lekki, Lagos State

SIZE: Five (5) Residential amidst two commercial Plots of Undeveloped land measuring 600sqm each, also including one free plot.

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

We acknowledge the following payments:

Plot Demarcation Fee: The sum of **N300,000.00** being payment for the plot demarcation.

Deed of Assignment Fee: The sum of **N 600,000.00** being payment for the Deed of Assignment

Survey plan; the sum of **N 900,000.00** being payment for your survey plan to be made in your name

You are required to pay:

Development Fee: To pay the sum of **N750, 000** only for your development fee.

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

CONTRACT OF SALE OF LAND

BETWEEN

**PWAN MAX PROPERTY AND BUSINESS SOLUTION
(VENDOR)**

AND



1. IN RESPECT OF ALL THAT FIVE PLOTS OF LAND MEASURING 600 SQUARE METERS EACH, ALSO INCLUDING ONE EXTRA FREE PLOT AT MAX GARDENS, ODEOMI, EBUTE OKUN ABAKEETA COMMUNITY, IBEJU LEKKI LAGOS STATE, NIGERIA.

Prepared By:

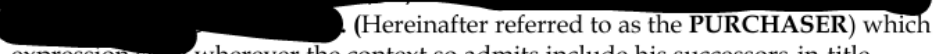
PRINCE O. WILLIAMS-JOEL ESQ.
FOR: PRINCE JOEL & ASSOCIATES
LEGAL PRACTITIONERS,
5ADOZEKCLOSE CHEVRON
DRIVE,
OFF ALTERNATIVE ROUTE,
LEKKI, LAGOS.
08034869295, 08020550410
princejoelesq@yahoo.com

This Contract of sale Agreement is made this 14TH August 2021.

BETWEEN

PWAN MAX PROPERTY AND BUSINESS SOLUTION under **DR. AUGUSTINE ONWUMERE** of Km42 Lekki-Epe Expressway, Sangotedo, Ajah Lagos State. (Herein referred to as the '**VENDOR**') which expression shall wherever the context so admits include its, successors-in-title, assigns and receivers of the **ONE PART**.

AND

 (Hereinafter referred to as the **PURCHASER**) which expression shall wherever the context so admits include his successors-in-title, assigns and receivers of the **SECOND PART**.

WHEREAS:

- i. All that vast area of land known as "**MAX GARDENS**", lying and situate at Odeomi, Ebute Okun Abakeeta Community, Odeomi, Ibeju Lekki Lagos State; (herein after referred to as "**The Property**") belongs to the Vendor by virtue of a Deed of Assignment from the Anifowoshe Family.
- ii. The **VENDOR** is desirous of selling all its interest in the five plots of 600 square meters of the **Property** to the **PURCHASER** and the **PURCHASER** is desirous of and has agreed to purchase the five plots of 600 square meters from **Property** from the **VENDOR** subject to Term of Contract herein appearing.

NOW IT IS HEREBY AGREED AS FOLLOWS

IN CONSIDERATION of the sum of N 4, 505,000.00 (Four Million, Five Hundred and Five Thousand Naira) only, for Five (5) Residential amidst two Commercial Plots with one corner plot of land, measuring 600 square meters each, receipt of which the **VENDOR** hereby acknowledges. The **VENDOR** as **BENEFICIAL OWNER** hereby agree to sell **UNTO the Purchaser** All that five plots of 600 square meters of land known as Max Gardens, Odeomi lying and situated at Ebute Okun, Abakeeta

THE SALE WILL BE SUBJECT TO THE FOLLOWING CONDITIONS:

1. PURCHASE PRICE:

The Complete Purchase Price will be of **N 4, 505,000.00 (Four Million, Five Hundred and Five Thousand Naira) only for Five (5) Residential amidst two Commercial Plots with one corner plot of land, measuring 600 square meters each.**

2. DATE OF COMPLETION:

The Sale Transaction will be completed within Three months from the date of the commencement.

3. PAYMENT SCHEDULE:

- a. **The complete purchase Price of N 4, 505,000.00 (Four Million, Five Hundred and Five Thousand Naira) only, shall be paid in Six instalments.**
- b. The complete price of the land was paid five times and in full.

4. TITLE:

- a. This agreement shall confer on the Purchaser, the right to take possession of the land, clear the land and commence building activities thereon.

5. POSSESSION

- a. Upon completion of the entire purchase price, the purchaser shall have full access to the land and commence any kind of work or structure on it subject to Lagos State Laws and Regulations.
- b. The purchaser shall have right against all forms of encumbrances and disturbance from the Vendor or anybody claiming title through them.

6. INDEMNITY

- a) The **VENDOR** covenants with the **PURCHASER** that they have not done, engaged in or carried out any act or omission, deed and/or anything whatsoever in respect of the property herein that will frustrate the transaction, easement and continue enjoyment of the property

IN WITNESS OF WHICH the parties executed this Contract of Sale *in* the manner below, day and year first above written.

SIGNED, SEALED AND DELIVERED by the within named '**VENDOR**'

DR. AUGUSTINE ONWUMERE

trading under the name and style of
PWAN MAX PROPERTY AND BUSINESS SOLUTION

SIGNATURE

SIGNED, SEALED AND DELIVERED by the within named '**PURCHASER**'

IN PRESENCE OF:



OFFICE: Km42, Iekki-Eke Expressway Opposite Children's Place Plaza,
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234 8180000652, +234 8180000637
Email: pwanmaxproperties@gmail.com

Sales Receipt

Sold To

Date:
Receipt #:
File #:
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	5	Max Gardens, Odeomi	6Mths

Description	Line Total	
Being Initial payment for Five(5) plots of Land at Max Gardens, Odeomi.	N 500,000.00	
Amount in words: Five Hundred Thousand Naira Only.	Subtotal	N 500,000.00
	Tax	N 0.00
	Total	N 500,000.00
Additional Information: Outright payment for Five(5)plots of land at Max Gardens, Odeomi, attracts One(1)free plot.		
Additional Information: Two(2) Commercial plots attracts 10% of land cost.		
Additional Information: One(1) Corner piece plot attracts 10% of land cost.		
Total Amount:	N 4,505,000.00	
Outstanding Balance:	N 4,005,000.00	
Size per Plot:	6005qm	

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature
