



**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](mailto: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

## **PETITION AGAINST PWAN MAX FOR FAILURE TO ALLOCATE LAND AFTER FULL PAYMENT OF ₦1,300,000**

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally petition **PWAN MAX** for failure to fulfill contractual obligations concerning the purchase and allocation of land, amounting to a total sum of **₦1,300,000**, including additional fees.

### **FACTS OF THE CASE:**

- In **2022**, the petitioner purchased **one plot of land** at **PWAN MaxHeights Estate Phase 2, Ibusa, Asaba, Delta State**, situated behind Admiralty University.
- The **total cost** of the land was **₦1,300,000**, which included payment for **survey, deed of assignment, and plot demarcation**.
- Despite receiving some documents, the **land has not been physically allocated** to the petitioner.
- All efforts to reach PWAN MAX for physical allocation have **proven abortive**, including when the petitioner intended to commence construction on the land.

### **APPLICABLE LEGAL BREACHES:**

The conduct of PWAN MAX constitutes a violation of:

- **Section 419 of the Criminal Code Act** – Obtaining money under false pretences

- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust
- **Relevant Consumer Protection Laws** – for failure to deliver paid services and misrepresentation

### **RELIEFS SOUGHT:**


The petitioner respectfully requests that your office:

1. **Launch a full investigation** into PWAN MAX regarding this matter
2. **Compel immediate allocation** or a **full refund of ₦1,300,000**, with interest
3. **Prosecute responsible parties** for their role in this fraudulent scheme
4. **Implement preventive measures** to safeguard future consumers against similar misconduct

### **ATTACHED DOCUMENTS:**

- Proof of payment
- Correspondence with PWAN MAX
- Any documents issued by the company in lieu of physical allocation

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 CHILDREN'S  
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS  
08180000652, 07064000761,

APRIL 30, 2022

[REDACTED]

Dear Sir/Ma,

#### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦250, 000.00 (Two Hundred and Fifty Thousand Naira)** only, being Initial- payment for **One (1) Residential** plot of land measuring 464sqm in **MAX HEIGHTS, ASABA** Off Admiralty, Ibusa situated at Isieke Community, Behind



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

September 13<sup>th</sup> 2022

[REDACTED]

Dear Sir/ Ma,

#### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦180,000.00 (One Hundred and Eighty Thousand Naira)** only, being further -payment for **One (1) Residential plot of land** measuring 464Sqm, in **MAX HEIGHTS ISIEKE COMMUNITY BEHIND ADMIRALTY UNIVERSITY OF NIGERIA ,OFF IBUSA/OGWASHI-UKU EXPRESSWAY ,IBUSA OSHIMILI NORTH LGA, ASABA DELTA STATE.**

The total cost of the plot as at the date of this payment is **₦ 1,000,000.00(One Million Naira)** only, for Six months scheme.



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PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS  
08180000652, 07064000761,

July 12<sup>th</sup> , 2022.

[REDACTED]

Dear Sir/ Ma,

### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦150,000.00 (One Hundred and Fifty Thousand Naira)** only, being further -payment for One **(1) Residential plot of land** measuring **464Sqm**, in **MAX HEIGHTS ISIEKE COMMUNITY BEHIND ADMIRALTY UNIVERSITY OF NIGERIA ,OFF IBUSA/OGWASHI-UKU EXPRESSWAY ,IBUSA OSHIMILI NORTH LGA, ASABA DELTA STATE.**

The total cost of the plot as at the date of this payment is **₦ 1,000,000.00(One Million Naira)** only, for Six months scheme.



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July 12<sup>th</sup> , 2022.

[REDACTED]

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The total cost of the plot as at the date of this payment is **₦ 1,000,000.00(One Million Naira)** only, for Six months scheme.

The suggested balance is **₦ 500,000.00(Five Hundred Thousand Naira)** only.



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PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS  
08180000652, 07064000761,

August 10<sup>th</sup> , 2022.

[REDACTED]

Dear Sir/ Ma,

### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦150,000.00 (One Hundred and Fifty Thousand Naira)** only, being further -payment for One **(1) Residential plot of land** measuring **464Sqm**, in **MAX HEIGHTS ISIEKE COMMUNITY BEHIND ADMIRALTY UNIVERSITY OF NIGERIA ,OFF IBUSA/OGWASHI-UKU EXPRESSWAY ,IBUSA OSHIMILI NORTH LGA, ASABA DELTA STATE.**

The total cost of the plot as at the date of this payment is **₦ 1,000,000.00(One Million Naira)** only, for Six months scheme.

**PWAN MAX** REAL ESTATE & PROPERTY DEVELOPMENT  
CONSULTANCY  
LAND SURVEY  
LOGISTICS  
...making home ownership dream a reality

**MAX HEIGHTS, ASABA | SUBSCRIPTION FORM**

**SECTION 1: SUBSCRIBER'S DETAILS**

Please complete all fields in block letters. Fields marked with asterisks (\*) are mandatory. Tick boxes where appropriate.

**NAME\*** [REDACTED]  
Mr. ☒ Mrs. ☐ Miss ☐ Others ☐ [REDACTED]

**NAME OF SPOUSE\*** [REDACTED]  
(If Applicable)

**ADDRESS\*** [REDACTED]

**DATE OF BIRTH\*** 19 [REDACTED] **GENDER\*** MALE ☒ FEMALE ☐

**MARITAL STATUS\*** MARRIED **NATIONALITY\*** NIGERIAN

**OCCUPATION** [REDACTED] **EMPLOYER'S NAME** [REDACTED]

**COUNTRY OF RESIDENCE** [REDACTED] **LANGUAGE SPOKEN** [REDACTED]

**EMAIL ADDRESS\*** [REDACTED]

**TELEPHONE NUMBER\*** [REDACTED] **MOBILE NUMBER\*** [REDACTED] 221

**SECTION 2: NEXT OF KIN**



## MAX HEIGHTS ASABA

### FREQUENTLY ASKED QUESTIONS/ TERMS AND CONDITIONS OF PURCHASE

- Q1. WHERE IS MAX HEIGHTS ASABA ?**  
A MAX HEIGHTS ASABA is an undeveloped parcel of land located at Admiralty Drive, Umuedi, Asaba, Delta state.
- Q2. WHO ARE THE OWNERS/DEVELOPERS OF MAX HEIGHTS ASABA ?**  
A PWAN MAX, a Leading Real Estate Company with offices in, Uyo, Akwa-Ibom State, Port-Harcourt, Rivers State, Asaba, Delta State & Lekki, Lagos State.
- Q3. WHAT TYPE OF TITLE DOES MAX HEIGHTS ASABA HAVE ON THE LAND?**  
A Registered Survey & Deed of Assignment
- Q4. ARE THERE ANY ENCUMBRANCES ON THE LAND ?**  
A The land is free from every known government acquisition or interests or adverse claims.
- Q5. WHAT IS THE PAYMENT STRUCTURE ?**  
A Outright payment of N1,500,000 only per 464 sqm & N2,800,000 only per 928sqm.  
B 12 Months Instalment Payment of N1.8 Million only per 464sqm & N3.5M per 928sqm.  
C N.B: Non-Payment of the monthly instalments as at when due shall be treated as a fundamental breach of the contract which shall result in termination or revocation of the contract/ OR attract default charge of 10% of the month payment.
- Q6. WHAT IS THE SIZE OF THE PLOT ?**  
A 464 sqm (50 by 100 ft) and 928 sqm (100 by 100 ft).
- Q7. IS THE ROAD TO THE ESTATE MOTORABLE ?**  
A Yes. The road to the estate is motorable and is maintained by PWAN.
- Q8. WHAT OTHER PAYMENTS DO I MAKE APART FROM THE PAYMENT FOR THE LAND ?**  
A Deed of Assignment : N100,000 only per plot (Subject to review)  
B Survey Fee : N150,000 only per plot (Survey Plan with Company's name attracts extra charges) (Subject to review)  
C Corner Plot Demarcation : N30,000 only per plot (Subject to review)  
D Development Fee : N1,000,000 only per plot (Subject to review) Development fee Covers the following (1) Drainage construction (2) Electrification (3) Creation of good road network (4) Landscaping & beautification (5) Special amenities.
- Q9. WHEN DO I MAKE THE OTHER PAYMENTS ?**  
A (i) Deed of Assignment, Provisional Survey Fee and Corner Plot Demarcation payment can be made immediately.  
(ii) Development Fee can be made after physical allocation of plot.
- Q10. WHAT DO I GET AFTER THE INITIAL PAYMENT DEPOSIT ?**  
A Starters pack comprising a letter of acknowledgement of subscription, receipts of payment.
- Q11. WHAT DO I GET AFTER COMPLETING PAYMENT FOR THE LAND ?**



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PLACE PLAZA, BY ALFA BUS STOP, AJAH  
📞 LAGOS 08180000652, 07064000761,

MAR 11<sup>TH</sup>, 2024



Dear Valued Client,

### **PHYSICAL ALLOCATION NOTIFICATION**

You are hereby notified of your allocation as follows:

**Estate Name:** MAX HEIGHTS PHASE 2 ASABA

**No of Plots:** ONE (1) PLOT

**Type of Plot:** RESIDENTIAL

**Size:** 464SQM

**Plot Details:** BLOCK 51, PLOT 11

2024