



**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  
**Email:** [info@pwangroup.com](mailto:info@pwangroup.com), [pwanpronigeria@gmail.com](mailto: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.

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### 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.

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### 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
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## **RELIEFS SOUGHT:**

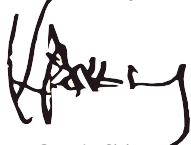
We respectfully request that the appropriate authorities:

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.
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## **ATTACHED DOCUMENTS:**

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



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*



**Sold To:**

Date:  
Receipt #:  
File #:  
Comment:

Payment Method	Reconciling Bank	Quantity	Expiry	Duration
Credit	Standard Bank of Africa	1	2024-12-31	12 Months
Description				
Bring payment for One (1) plot of Land at Max Villa Phase 2, Accra				Line Total
				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:		6640sqm		

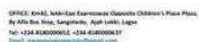
FOR PWAN Max Properties and Business Solution

RYEYNI QHANGDEK

Signature \_\_\_\_\_

...making home ownership dreams a reality

[www.gwarchives.com](http://www.gwarchives.com)



**Sold 7**

Date: \_\_\_\_\_  
Receipt #: \_\_\_\_\_  
File #: \_\_\_\_\_  
Comment: \_\_\_\_\_

Payment Method	Reconciling Bank	Quantity	Costs	Duration
Outright	United Bank of Africa	1	Max Vile Phase 2,Asobie	
<b>Description</b>				<b>Line Total</b>
Being payment for One(1)plot of Land at Max Vile Phase 2,Asobie				₦ 30,000.00
<b>Amount in words:     Thirty Thousand Naira and Zero Kobo</b>				<b>Subtotal</b> ₦ 30,000.00 <b>Tax</b> ₦ 0.00 <b>Total</b> ₦ 30,000.00
<b>Additional Information:</b>				
Total Amount:                    ₦ 30,000.00				
Outstanding Balance:           ₦ 0.00				
Size per Plot:                   6643sqm				

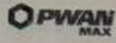
FOR PWAN Max Properties and Business Solution.

OYEYEMI QUANDEEN

Signature \_\_\_\_\_







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-customer@pmail.com

## Sales Receipt

Sold To

Date:

Receipt #:

File #:

Comment:

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

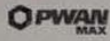
Description	Line Total
Being Final payment for One(1)plot of Land at Max Ville, Asaba	N 220,000.00
Amount in words: Two Hundred and Twenty Thousand Naira Only.	
	Subtotal N 220,000.00
	Tax N 0.00
	Total N 220,000.00

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

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





OFFICE: Km43, Ibeju-Lekki Expressway Opposite Children's Place Plaza,  
By ATo Bus Stop, Ibeju-Lekki, Ajah LGA, Lagos  
Tel: +234-8180000652, +234-8180000637  
Email: pwancare@pwancare.com

## Sales Receipt

Sold To: [REDACTED]

Date: [REDACTED]  
Receipt #:  
File #:  
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 N 500,000.00
	Tax N 0.00
	Total 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	
Habib Sheriff	
Signature:	



Sold To

# Sales Receipt

Date:  
Receipt #:  
File #:  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Ville, Asaba	3Mths
<b>Description</b>				
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
<b>Additional Information:</b>				
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	
	