ELUYEFA CHAMBERS



No. 22 Admiralty Way, Lekki Phase 1

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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 FOR FAILURE TO ALLOCATE LAND DESPITE RECEIVING AN AMOUNT TO THE SUM OF № 3,500,000

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, specifically **PWAN Max**, over its failure to allocate land as promised and documented since 2022.

FACTS OF THE CASE:

- 1. In 2022, the alleged petitioner paid for a plot of land from **PWAN Max Oba**.
- 2. Following the payment, the petitioner was issued a **Contract of Sale** and a **Physical Allocation Letter**, which was given by the chairman of the company.
- 3. Upon receiving a notice for physical allocation, the petitioner reached out to the relevant PWAN Max branch office on the appointed date.
- 4. Shockingly, the branch staff denied any knowledge or instruction from the chairman concerning the allocation and stated that **no such exercise was scheduled or authorized**.
- 5. Since then, **no allocation has occurred**, and the conflicting statements between PWAN Max representatives have caused distress, confusion, and loss of confidence in the company.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN Max and its representatives may violate the following provisions under Nigerian law:

- 1. Section 312 of the Criminal Code Act, Cap C38, LFN 2004 Criminal breach of trust.
- 2. **Section 419 of the Criminal Code Act** Obtaining property under false pretences.
- 3. **Federal Competition and Consumer Protection Act (FCCPA)** For failure to honor contractual obligations and provide fair treatment to customers.

RELIEFS SOUGHT:

We respectfully request that your office:

- 1. **Investigate PWAN Max and its officers** for breach of contract and misleading practices.
- 2. **Prosecute all responsible parties** for deceptive conduct and breach of trust.
- 3. Compel allocation of the land paid for or refund the total amount with accrued interest.
- 4. **Impose regulatory sanctions** to prevent further occurrences of such acts that harm consumers and undermine public trust.

ATTACHED DOCUMENTS:

Find attached

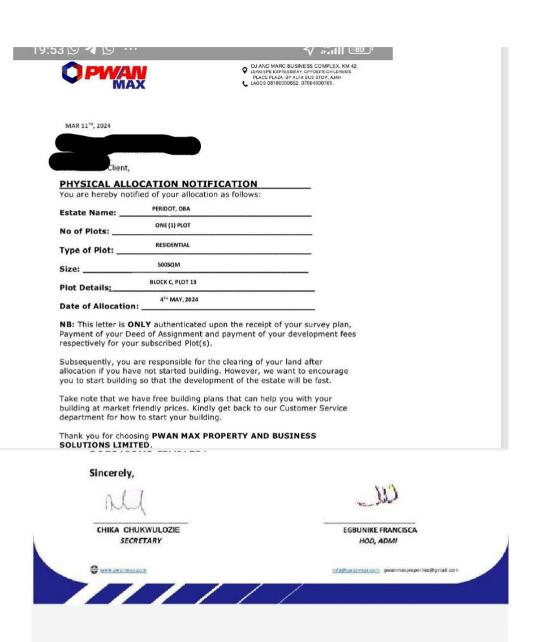
Yours faithfully,

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner





OLJ AND MARC BUSINESS COMPLEX, KM 42 LEKKI EPEEXPRESSWAY, OPPOSTE CHUDRENS PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS C08180008652, 07064000761,

JULY 22, 2023.



Dear Sir/Ma,

PAYMENT NOTICATION LETTER

Sequel to the receipt of your payment of № 3,500,000.00(Three Million, Five Hundred Thousand Naira) only, being payment for One (1) Residential plot of land in PERIDOT, OBA situated at ugbo okpuno etiti/umuafa village of aborji oba idemili south, Anambra State.

Please find below the description of the allocation:

LOCATION: Oba, Anambra State.

SIZE: One (1) Residential plot of undeveloped land measuring 500Sqm.

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

We also acknowledge that you are entitled to an-inclusive package (Free documentation fees)

You are required to make the following payments:

Development Fee: The price for the development fee will be determined later

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

EGBUNIKE FRANCISCA

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Ho@pwanmax.com, pwarmaxproperties@gmail.com

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