ELUYEFA CHAMBERS





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

PETITION AGAINST PWAN MAX FOR FAILURE TO ALLOCATE LAND AFTER FULL PAYMENT OF №1,535,000

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 regarding the sale and allocation of land in **Epe, Lagos State**, after receiving full payment.

FACTS OF THE CASE:

- On 07/12/2022, the petitioner purchased one plot of land from PWAN MAX located in Epe, Lagos State.
- The total sum paid was ₹1,535,000, comprising ₹1,500,000 for the land and ₹35,000 for additional administrative and processing fees.
- Despite fulfilling all financial obligations, **PWAN MAX failed to carry out any physical allocation** of the land.
- Repeated efforts by the petitioner to follow up with the company have **yielded no positive response or resolution**.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN MAX amounts to:

- 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
- Violation of **consumer protection laws** relating to fair service, delivery of paid products, and financial transparency

RELIEFS SOUGHT:

The petitioner respectfully requests:

- 1. An **immediate investigation** into PWAN MAX's operations regarding land sales and allocations
- 2. Compulsory allocation of the land or a full refund of №1,535,000 with interest
- 3. Prosecution of responsible officers for contractual and financial misconduct
- 4. Measures to ensure that **other consumers are protected** from similar fraudulent land schemes

ATTACHED DOCUMENTS:

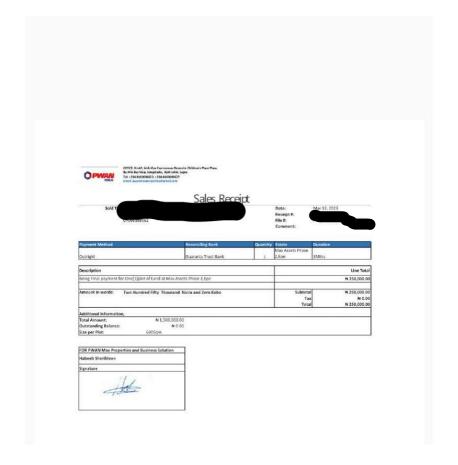
- Proof of payment (\aleph 1,535,000)
- Any communication or documents received from PWAN MAX

Yours faithfully,

AKINOLA SAMUEL ELUYEFA ESQ Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner





Outright	Guaranty Trust Bank	1	2,Epe	
Description			Line Total	
Being payment for One[1]plot of Land at Max Assets Phase 2,Epe			N 150,000.00	
Amount in words: One Hundred and Fifty Thousand Naira Only.		Subtotal Tax Total	N 150,000.00 N 0.00 N 150,000.00	
Additional Information:				
Total Amount:	N 150,000.00			
Outstanding Balance:	N 0.0D			
Size per Plot:	600Sqm			

OYEYEMI QUAM	
Signature	9630-1619-1
	BAL

...making home ownership dreams a reality

www.pwanmax.com



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

15th February, 2024

Dear Valued Client,

PHYSICAL ALLOCATION UPDATE FOR MAX ASSETS EPE PHASE 2

Greeting from PWAN Max Property and Business Solutions Limited

We hereby use this medium to congratulate you on your subscription to our Estate "Max Assets Epe Phase 2". We wish you success in your endeavors. Your loyalty has made our journey truly remarkable, and we truly appreciate your continued support throughout the years.

While we express our heartfelt gratitude to your kind self for choosing to purchase your property from us at Pwan Max, we appreciate your cooperation and patience with us since we embarked on this mutually beneficial relationship of making your home ownership dream a reality.

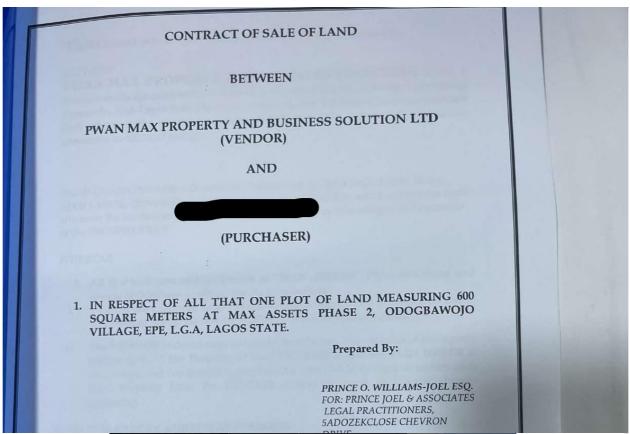
However, we apologize for the unintended delay in the allocation of your plot(s) in the estate as the delay has put your trust in us at stake and has made many to discontinue their relationships with us. We render our unreserved apologies for the inconveniences we have caused all of our esteemed clients over the year(s) as this was never our intention.

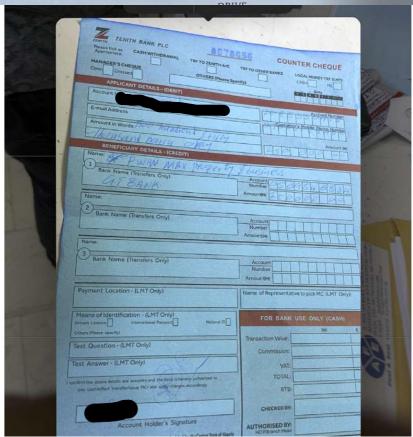
In this event, it is pertinent to update you as to the allocation of plots in the estates, in order to reassure you of our commitment towards a quick and reliable allocation of your plot(s) in the said estate MAX ASSETS PHASE 2 EPE being lying and situate at Epe L.G.A Lagos State. Thus, we crave your indulgence to please bear with us a little longer, as we work towards commencing physical allocation of your plots in April 2024 as all necessary plans are being put in place to ensure the commencement of this exercise. Kindly also bear in mind that allocation is also carried out in Batches and on first-come first-serve basis.

We wish to reiterate our commitment to the vision of making home ownership dream a reality of as many people as possible in Nigeria and Africa. Thank you for your magnanimous patience and understanding.

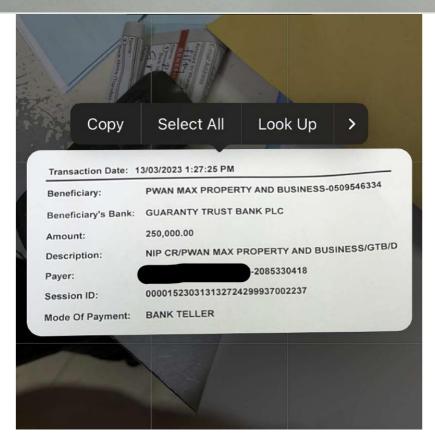
Yours Faithfully

FOR: PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LIMITED











Transaction Date: 13/03/2023 1:27:25 PM

PWAN MAX PROPERTY AND BUSINESS-0509546334 Beneficiary:

Beneficiary's Bank: GUARANTY TRUST BANK PLC

250,000.00 Amount:

NIP CR/PWAN MAX PROPERTY AND BUSINESS/GTB/D Description:

2085330418 Payer:

000015230313132724299937002237 Session ID:

Mode Of Payment: BANK TELLER