

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
AFTER PAYMENT OF ₦5,030,000.00 (FIVE MILLION, THIRTY THOUSAND NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, specifically its subsidiary **PWAN Champion Realtors and Estates Limited / PWAN Max Asset**, over its failure to fulfil contractual obligations regarding the allocation of one plot of land since full payment was made in 2022.

FACTS OF THE CASE:

1. In February and March 2022, the alleged petitioner made full payment totalling **₦5,030,000.00 (Five Million, Thirty Thousand Naira Only)** for one plot of land at **Max Asset Estate, Okpuno, Awka**, as part of a promotional offer by PWAN Max Asset.
2. The petitioner received some documentation following payment, including:
 - Contract of Sale
 - Payment Notification Letter
 - Receipt of Initial Payment
 - Voice recording and messages from PWAN agent confirming allocation to Max Asset Estate
 - Subsequent allocation letter for Wonderland Estate, Ishiagu

3. After prolonged silence and persistent follow-up, including multiple unanswered emails and follow-ups from 2022 through 2024, PWAN failed to provide valid allocation or survey documentation for either location (Okpuno or Ishiagu).
4. In March 2024, the petitioner was issued an allocation letter for a new estate, **Wonderland Estate, Ishiagu**, but upon physical inspection, the site was an undeveloped bush with no signs, no fencing, and no evidence of real allocation. No survey plan or deed has been provided to date, despite full payment and further requests.
5. The continued delays, changing of estate sites without proper explanation, failure to provide key land documents, and lack of transparency from PWAN Max Asset and its representatives constitute a breach of contract and fraudulent misrepresentation.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN Max Asset and its representatives potentially violates the following laws of the Federal Republic of Nigeria:

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. **Consumer Protection Framework** – Violations relating to failure to uphold agreed terms of service and unjust enrichment

RELIEFS SOUGHT:

Given the seriousness of this matter and the long-standing delay (now exceeding **three years**), we respectfully request that your office:

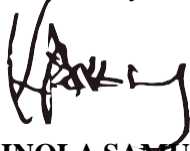
1. Investigate PWAN Max Asset and PWAN Group for breach of contractual obligations and potential fraudulent land transactions.
2. Prosecute all officers and agents involved in the continued deception, failure to allocate land, or failure to issue a timely refund.
3. Compel a **full refund of ₦5,030,000.00** to the petitioner with accrued interest, or alternatively ensure **immediate allocation of land** with proper title and survey documentation.
4. Implement **regulatory and enforcement actions** to prevent further exploitation of real estate investors and Nigerians in the diaspora by developers operating in similar fashion.

ATTACHED DOCUMENTS:

- Contract of Sale
- Payment Receipt
- Payment Notification Letter
- Allocation Letter (Wonderland Estate)
- Email correspondence history
- Screenshots of bank payments

We trust that this matter will be treated with the urgency and seriousness it deserves in the interest of justice and public protection.

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,

MAR 18, 2025

[REDACTED]

Dear Valued Client

PHYSICAL ALLOCATION NOTIFICATION

You are hereby notified of your allocation as follows:

Estate Name: WONDERFUL ESTATE ISHIAGU, AWKA

No of Plots: ONE (1) PLOT

Type of Plot: RESIDENTIAL

Size: 464SQM

Plot Details: BLOCK C, PLOT 3

Date of Allocation: APRIL – MAY, 2025

NB: This letter is **ONLY** authenticated upon the receipt of your survey plan, Payment of your Deed of Assignment and payment of your development fees respectively for your subscribed Plot(s).

Subsequently, you are responsible for the clearing of your land after allocation if you have not started building. However, we want to encourage you to start building so that the development of the estate will be fast.

Take note that we have free building plans that can help you with your building at market friendly prices. Kindly get back to our Customer Service department for how to start your building.

Thank you for choosing **PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LIMITED.**

Sincerely,



CHIKA CHUKWULOZIE
SECRETARY



EGBUNIKE FRANCISCA
HOD, ADMIN



OFFICE: Km42, Iekki-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 To

[REDACTED]

Date: Feb 28, 2022

Receipt #:

File #:

Comment:

[REDACTED]

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Providus Bank Plc	1	Max Assets, Awka	3Mths

Description	Line Total	
Being Initial payment for One(1)plot of Land at Max Assets, Awka	N 500,000.00	
Amount in words: Five Hundred Thousand Naira and Zero Kobo	Subtotal	N 500,000.00
	Tax	N 0.00
	Total	N 500,000.00
Additional Information; 5% discount on Pwan Max Anniversary		
Total Amount:	N 4,750,000.00	
Outstanding Balance:	N 4,250,000.00	
Size per Plot:	464Sqm	

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature




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

Deed of Assignment

Sold To

[REDACTED]
[REDACTED]

Date:

Feb 04, 2023

Receipt #:


[REDACTED]

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Polaris Bank Plc	1	Max Assets, Awka	

Description	Line Total	
Being payment for One (1) Plot of Land at Max Assets, Awka	N 100,000.00	
Amount in words: One Hundred thousand Naira Only.	Subtotal	N 100,000.00
	Tax	N 0.00
	Total	N 100,000.00
Total Amount: N 100,000.00		
Outstanding Balance: N 0.00		
Size per plot 464Sqm		

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature




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

SURVEY FEE

Sold To

[REDACTED]
[REDACTED]

Date:

Feb 04, 2023

Receipt #:

[REDACTED]

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Polaris Bank Plc	1	Max Assets, Awka	

Description	Line Total	
Being payment for One (1) Plot of Land at Max Assets, Awka	N 130,000.00	
Amount in words: One Hundred and Thirty Thousand Naira Only.	Subtotal	N 130,000.00
	Tax	N 0.00
	Total	N 130,000.00
Additional Information:		
Total Amount: N 250,000.00		
Outstanding Balance: N 120,000.00		
Size per Plot: 464Sqm		

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature




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

PLOT DEMARCATION

Sold To:

[REDACTED]
4515156359512

Date: Feb 04, 2023

Receipt #:

[REDACTED]

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Polaris Bank Plc	1	Max Assets, Awka	

Description	Line Total
Being payment for One (1) Plot of Land at Max Assets, Awka	₦ 50,000.00
Amount in words: Fifty Thousand Naira Only.	
	Subtotal ₦ 50,000.00
	Tax ₦ 0.00
	Total ₦ 50,000.00
Additional Information:	
Total Amount:	₦ 50,000.00
Outstanding Balance:	₦ 0.00
Size per Plot:	464Sqm

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature


CONTRACT OF SALE OF LAND

BETWEEN

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

AND

[REDACTED]
(PURCHASER)

IN RESPECT OF ALL THAT ONE PLOT OF LAND MEASURING 464 SQUARE METERS AT MAX ASSETS, AWKA, SITUATED AT OKPUNO OKOCHI AWKA SOUTH, ANAMBRA STATE.

This Contract of sale Agreement is made this 11ST day of April 2022.

BETWEEN

PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LTD,

a limited liability company with its head office located at KM 42 Lekki-Epe Expressway, Sangotedo, Ajah Lagos State (Herein referred to as the '**ASSIGNOR**') which expression shall wherever the context so admits include his heirs, agents, administrators, successors-in-title and assigns.

AND

[REDACTED] (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:

All that vast area of land known as "**MAX ASSETS**", lying and situate at Okpuno, Okochi Awka South LGA, Anambra State. (Herein after referred to as "**The Property**") belongs to the Vendor by virtue of a Deed of Assignment from, The association of senior civil servant of Nigeria.(Anambra State)

- i. The **VENDOR** is desirous of selling all its interest in the one plot of 464 square meter of the **Property** to the **PURCHASER** and the **PURCHASER** is desirous of and has agreed to purchase in the one plot of 464 square meters from

THE SALE WILL BE SUBJECT TO THE FOLLOWING CONDITIONS:

1. PURCHASE PRICE:

The Complete Purchase Price will be of **₦4,750,000.00 (Four Million, Seven Hundred and Fifty Thousand Naira)** only for One (1) Residential plot of land measuring 464 square meters.

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 **₦4,750,000.00 (Four Million, Seven Hundred and Fifty Thousand Naira)** only shall be paid in three instalments.
- b. The complete price of the land was paid two 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 Anambra 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



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

Deed of Assignment

Date: Feb 04, 2023
Receipt #: [REDACTED]
File #: [REDACTED]
Comment: [REDACTED]

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Polaris Bank Plc	1	Max Assets, Awka	

Description	Line Total	
Being payment for One (1) Plot of Land at Max Assets, Awka	N 100,000.00	
Amount in words: One Hundred thousand Naira Only.	Subtotal	N 100,000.00
	Tax	N 0.00
	Total	N 100,000.00
Total Amount:	N 100,000.00	
Outstanding Balance:	N 0.00	
Size per plot	464Sqm	

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
☎ 08180000652, 07064000761,

ZOOM MEETING_ MAX ASSETS OKPUNO OKOCHI, AWKA ESTATE, HELD ON MONDAY, THE 9TH DAY OF JANUARY, 2023 AT 12NOON

In attendance – were about 40 participants (both Clients and PBOs)

AGENDA

- Why we called this meeting?
- Where is the property-Max Assets Okpuno, Awka is located and how It was acquired
- Time frame for physical allocation

Chairman's opening Remarks- Chairman, PWAN Group- Dr Augustine Onwumere introduced himself; welcomed every one present into the meeting as well as the new year.

The reasons for this meeting

1. To intimate on the current status update on property as well as communicate on reasons for pending physical allocation.

CURRENT UPDATE OF THIS ESTATE AND MAJOR CHALLENGE

-
1. To intimate on the current status update on property as well as communicate on reasons for pending physical allocation.

CURRENT UPDATE OF THIS ESTATE AND MAJOR CHALLENGE

Chairman informed on the location of property situate at Okpuno Okochi particularly located 10 mins drive after the Federal secretariat, Awka. The land which originally belonged to the Labour Association Anambra State was sold to us in 2021. It was when we commenced bulldozing in 2022 that communal issues sprang up on monies not been shared or allocated properly amongst themselves.

Although we engaged the services of a prominent legal practitioner resident in Awka to enable resolution of these issues to be brought to a close and this we have been able to achieve to a huge end as such hopeful that access to property be granted us in the soonest time.

Moreso on dredging and creation of access road, the Ministry of Housing are of the opinion that its their exclusive right to continue same but we intend to bring this activity up to speed by carrying out this dredging by ourselves to enable us carve out access roads timely.

Time frame for physical allocation- Whilst we acknowledge that paper allocation has already been issued to our clients, physical allocation considering all the activities to be taken care of above as well February which is the election period stalling some events will commence from **May, 2023**