



**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 PWAN GROUP FOR FAILURE TO ALLOCATE LAND  
AFTER PAYMENT OF ₦2,000,000.00 (TWO MILLION NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, specifically its relevant subsidiary, for breach of contract and suspected fraudulent land transaction practices.

**FACTS OF THE CASE:**

1. The alleged petitioner entered into a land purchase agreement with PWAN Group and made full payment totaling approximately **₦2,000,000.00** for a plot of land, paid in **installments**.
2. Upon completion of payment, the petitioner made **repeated requests** for land allocation via calls and emails.
3. Rather than honoring the request, the company's representatives began **redirecting the petitioner from one contact person to another**, creating unnecessary delays and confusion.
4. Eventually, the company **ceased responding** altogether—**calls were ignored**, and **emails were never answered**.
5. To date, no land has been allocated, and no formal explanation or resolution has been provided.

## APPLICABLE LEGAL BREACHES:

The conduct of PWAN Group and its agents constitutes possible violations of Nigerian law, including:

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. **Breach of contract and violation of the Consumer Protection Framework** – Failure to deliver on paid obligations and provide fair service.

## RELIEFS SOUGHT:

In light of the distress and financial loss suffered by the petitioner, we respectfully request that your office:

1. **Initiate a thorough investigation** into the conduct of PWAN Group and its agents.
2. **Prosecute all parties involved** for failure to allocate land after full payment and possible fraudulent misrepresentation.
3. **Compel a full refund of ₦2,000,000.00** to the petitioner, with **interest** or, alternatively, **ensure immediate and proper land allocation**.
4. Implement **regulatory oversight** to protect future buyers from similar experiences.

## ATTACHED DOCUMENTS:

- Installment payment receipts

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ


*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*

Transaction Amount	N78,190
Transaction Type	INTER-BANK
Transaction Date	2022-07-25 14:06:41
Sender	[REDACTED]
Beneficiary	MAX CONSTRUCTION AND BUILDING COMPANY PWAN 4091402258 Polaris Bank
Remark	Sunshine city estate finally payment
Transaction Reference	NXGETZ-09FG220725140307008RPIPCE
Transaction Status	Successful

If you have any questions or would like more information, please call our 24-hour Contact Centre on 0700CallAccess 0700 3000000 +234 1-2712005-7 +234 1-2802500 or send an email to

		Contact Address: 36B, Freedom Way, Lekki Phase 1, BY VFS Global. Opposite Delta Afrique Atlanta, Lagos. Tel: 08180145555, 08181045555. Email Address: pwanroyale@gmail.com	
<h3>Sales Receipt</h3>			
Sold to: [REDACTED]		Date: February 26, 2021 Receipt: [REDACTED] File: [REDACTED]	
Payment Method	Reconciling Bank	Land Location	DURATION
INSTALLMENTS	ZENITH BANK	SACRED HEART ESTATE	6 MONTHS
Qty	Size #	Description	Amount
1.00	100ft BY 100ft	Further Payment for One(1) plot of land at Sacred Heart Estate.	109,000
			109,000
			109,000.00
Amount in words: One Hundred and Nine Thousand Naira Only			Total Discount
Subtotal			109,000.00
Sales Tax			
Total			109,000.00



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

Date: Jul 25, 2022

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Polaris Bank Plc	1	Sunshine City Umuwuagwu Isele, Asaba	6Mths

Description	Line Total
Being Final payment for One(1)plot of Land at Sunshine City Umuwuagwu Isele, Asaba	N 78,190.00
Amount in words: Seventy Eight Thousand One Hundred Ninety Naira and Zero Kobo	
	Subtotal N 78,190.00
	Tax N 0.00
	Total N 78,190.00

Additional Information;

Total Amount: N 900,000.00  
Outstanding Balance: N 0.00  
Size per Plot: 464Sqm

FOR PWAN Max Properties and Business Solution

Habeeb Sherifdeen

Signature