

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

## **PETITION AGAINST [REAL ESTATE COMPANY NAME] FOR LAND FRAUD AND NON-ALLOCATION – ₦3,800,000 TOTAL LOSS**

We write to formally lodge a petition against [Insert Real Estate Company Name if known] for **fraudulent land sale, non-allocation, and breach of trust** after collecting a total of **₦3,800,000** 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 ₦2,800,000** to the same party — possibly for documentation, further allocation, or associated land services.
- The **total sum of ₦3,800,000** 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 ₦3,800,000** 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 ₦2,800,000
- 

Yours faithfully,



**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

ELUYEFA CHAMBERS

*On behalf of the Alleged Petitioner*



OFFICE: 4th/5, 1st/2nd Floor, Opposite Children's Place Plaza,  
By Abu Bakr Street, Surulere, Lagos State, Lagos  
Tel: +234 8180000000, +234 8180000001  
Email: [info@pwanmax.com](mailto:info@pwanmax.com)

## SURVEY FEE

Sold To: [REDACTED]

Date: Oct 20, 2023

Receipt #: [REDACTED]

File #: [REDACTED]

Comment: [REDACTED]

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Villa Phase 2, Asaba	
Description				Line Total
Being payment for One (1) plot of Land at Max Villa Phase 2, Asaba				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: 6645sqm				

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEIN
Signature

...making home ownership dreams a reality

[WWW.PWANMAX.COM](http://WWW.PWANMAX.COM)



OFFICE: 4th/5, 1st/2nd Floor, Opposite Children's Place Plaza,  
By Abu Bakr Street, Surulere, Lagos State, Lagos  
Tel: +234 8180000000, +234 8180000001  
Email: [info@pwanmax.com](mailto:info@pwanmax.com)

## PLOT DEMARCATION

Sold To: [REDACTED]

Date: Oct 20, 2023

Receipt #: [REDACTED]

File #: [REDACTED]

Comment: [REDACTED]

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Villa Phase 2, Asaba	
Description				Line Total
Being payment for One (1) plot of Land at Max Villa Phase 2, Asaba				N 30,000.00
Amount in words: Thirty Thousand Naira and Zero Kobo				
				Subtotal
				N 30,000.00
				Tax
				N 0.00
				Total
				N 30,000.00
Additional Information:				
Total Amount: N 30,000.00				
Outstanding Balance: N 0.00				
Size per Plot: 6645sqm				

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEIN
Signature



OFFICE: 6th Floor, 1st Main Road, Old Kariakoba, Old Kariakoba, Old Kariakoba  
By the Sea, Old Kariakoba, Old Kariakoba, Old Kariakoba  
Tel: +254 818888888, +254 818888888  
Email: pwani@pwani.com

## Deed of Assignment

Sold To: [REDACTED]

Date: 10/10/2023

Receipt #:

File #:

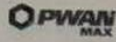
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Villa Phase 2, Ausha	
Description				Line Total
Being payment for One(1)plot of Land at Max Villa Phase 2, Ausha				N 100,000.00
Amount in words: One Hundred Thousand Naira and Zero Kobo				
				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:				664sqm

FOR PWANI Max Properties and Business Solution
OYEYEMI QUAMDEIN
Signature

...making better ownership dreams a reality.

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



OFFICE: Km42, Ibeju-Eke Expressway Opposite Children's Place Plaza,  
By Afe Bus Stop, Sangotedo, Ajah Lekki, Lagos  
Tel: +234-810000652, +234-8180000637  
Email: pwanmax-ops@pwanmax.com

## Sales Receipt

Sold To

08032113472

Date: Aug 4, 2021

Receipt #:

File #:

Comment:

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

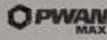
Description	Line Total
Being Final payment for One(1)plot of Land at Max Ville, Asaba	N 220,000.00
Amount in words: Two Hundred and Twenty Thousand Naira Only.	
	Subtotal N 220,000.00
	Tax N 0.00
	Total N 220,000.00

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	
Habib Sherifdeen	
Signature	





OFFICE: Km42, Ibeju-Lekki Expressway Opposite Children's Place Plaza,  
By Afa Bus Stop, Sangotedo, Alimosho, Lagos  
Tel: +234-818000652 +234-818000617  
Email: pwanmax@pwandev.com

## Sales Receipt

Sold To: [REDACTED]

08032113472

Date: May 4, 2021

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:	4645qm

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

Sold To

# Sales Receipt

08092113472

Date: Jul 14, 2021

Receipt #:

File #:

Comment:

<b>Payment Method</b>		<b>Reconciling Bank</b>		<b>Quantity</b>	<b>Estate</b>	<b>Duration</b>
Outright		United Bank of Africa		1	Max Ville, Asaba	3Mths
<b>Description</b>						<b>Line Total</b>
Being Further payment for One(1) plot of Land at Max Ville, Asaba						N 280,000.00
<b>Amount in words:</b> Two Hundred and Eighty Thousand Naira Only.						
						Subtotal
						N 280,000.00
						Tax
						N 0.00
						<b>Total</b>
						N 280,000.00
<b>Additional Information:</b>						
Total Amount:		N 1,000,000.00				
Outstanding Balance:		N 220,000.00				
Size per Plot:		464Sqm				

FOR PWAN Max Properties and Business Solution	
Habeb Sherifdeen	
Signature	

