



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 MAX PRIDE FOR FAILURE TO ALLOCATE LAND AFTER FULL PAYMENT – TOTAL AMOUNT ₦4,000,000

We write on behalf of our client (hereinafter referred to as “the petitioner”) to formally lodge a **complaint and petition against PWAN Max Pride**, Asaba, for **breach of contract, misrepresentation**, and failure to fulfill agreed land allocation following full payment made since 2023.

FACTS OF THE CASE:

- In 2023, the petitioner purchased **four (4) plots of land** from **PWAN Max Pride** (a subsidiary of the PWAN Group) for a total of **₦4,000,000**, inclusive of **documentation and land costs**.
- Despite full payment, **no land has been physically allocated** to the petitioner to date.
- The petitioner made multiple attempts to get updates from the Managing Director of PWAN Max Pride in Asaba. However:
 - The MD **stopped responding to calls**.
 - The MD repeatedly **claimed that the land had no issue** with the host community, while **refusing to proceed with allocation**.
- During a physical visit to the PWAN head office, the petitioner was told to **forfeit the original four plots** and instead accept **only two plots at a completely different and less desirable location**, far removed from the original site.
- This offer was made **without justification, formal documentation, or consent**, and was firmly rejected by the petitioner.

APPLICABLE LEGAL BREACHES:

The actions of PWAN Max Pride constitute the following:

- **Breach of Contract** – Failure to allocate the agreed number of plots after full payment.
 - **Fraudulent Misrepresentation** – Persistently assuring the petitioner that land had no issues while avoiding delivery.
 - **Criminal Breach of Trust and False Pretenses** under Sections **419 and 312 of the Nigerian Criminal Code** – Collecting funds with no intention or ability to fulfill the agreed transaction.
 - **Violation of Consumer Protection Laws** – Collecting payment without delivering the paid service or providing adequate redress.
-

RELIEFS SOUGHT:

We respectfully request that your esteemed office:

1. **Investigate** PWAN Max Pride for potential **land fraud** and **criminal breach of trust**.
 2. **Compel** the immediate allocation of the **original four (4) plots**, or **equivalent plots of equal value and location**.
 3. In the alternative, **mandate a full refund of ₦4,000,000**, with applicable interest for delay.
 4. **Sanction PWAN Max Pride** through appropriate **regulatory or criminal actions** to deter future exploitation of innocent consumers.
-

ATTACHED DOCUMENTS:

- Evidence of Payment (Receipts/Bank Transfers)
- Communication Records (Calls/SMS/Emails)

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



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

PLOT DEMARCATION

Sold To: [REDACTED] Date: June 8, 2023
Receipt #: [REDACTED]
File #: [REDACTED]
Comment: [REDACTED]

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Guaranty Trust Bank	4	Max Pride, Asaba	

Description	Line Total
Being payment for Four(4)plots of Land at Max Pride, Asaba	₦ 200,000.00
Amount in words: Two Hundred Thousand Naira and Zero Kobo	
	Subtotal ₦ 200,000.00
	Tax ₦ 0.00
	Total ₦ 200,000.00
Additional Information:	
Total Amount:	₦ 200,000.00
Outstanding Balance:	₦ 0.00
Size per Plot:	4645sqm

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature
