

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 ₦1,800,000.00 (ONE MILLION, EIGHT HUNDRED THOUSAND
NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, particularly its subsidiary **PWAN Max Assets**, over the non-allocation of two plots of land purchased in 2021 at Max Assets Estate, Otulu, Asaba, despite full payment.

FACTS OF THE CASE:

1. In **2021**, the alleged petitioner purchased **two (2) plots of land** at **Max Assets Estate, Otulu, Asaba** for the sum of **₦1,800,000.00**.
2. The petitioner completed all required payments, including fees for documentation and allocation, and was issued only receipts and payment acknowledgments.
3. Since then, despite **multiple visits** to the PWAN office and **numerous follow-up emails**, no physical allocation has occurred.
4. Allocation dates have repeatedly been promised but never honoured, with **excuses and stories replacing action**.
5. At one point, a staff member inadvertently disclosed that the land in question was under **dispute**, likely explaining the continuous delays.
6. The petitioner even **requested relocation to an alternative site**, but this request was ignored.
7. All attempts to secure a **refund** have also been unsuccessful, resulting in the **complete loss of ₦1,800,000.00**, emotional distress, and loss of trust.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN Max Assets and its representatives may constitute breaches 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 by false pretences.
3. **Provisions of the Federal Competition and Consumer Protection Act (FCCPA)** – Especially regarding failure to honour terms of sale and fair treatment of customers.

RELIEFS SOUGHT:

Given the gravity of the situation and prolonged delays, we respectfully seek:

1. **Immediate investigation** into the business conduct of PWAN Max Assets and its agents.
2. **Prosecution** of any persons found responsible for breach of contract or deceptive land practices.
3. **Full refund of ₦1,800,000.00 with accrued interest, or urgent allocation** of two plots of land as originally agreed.
4. **Regulatory sanctions and enforcement actions** to prevent recurrence and protect future buyers.

ATTACHED DOCUMENTS:

- Receipts and payment acknowledgements
- Email correspondences and allocation promises
- Any documents indicating full compliance by the petitioner

We urge your office to treat this petition with urgency and fairness, in the interest of justice and consumer protection.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner





FirstBank

Since 1894

Transaction Receipt

Transaction Date: Mon Jan 31 15:27:55 WAT 2022

Transaction Type: NIP Transfer

Amount: 700,000.00

Source Account: 2035***878

Source Account Name: [REDACTED]

Beneficiary Account Number: 5400594605

Beneficiary Name: PWAN MAX PROPRTY BIZ SOL LTD

Bank: Providus Bank



FirstBank

Since 1894

Transaction Receipt

Transaction Date: Fri Sep 15 13:28:30 WAT 2023

Transaction Type: NIP Transfer

Amount: 300,000.00

Source Account: 2035***878

Source Account Name: [REDACTED]

Beneficiary Account Number: 0509546334

Beneficiary Name: PWAN MAX PROPERTY AND BUSINESS

Bank: GTB (Guaranty Trust Bank)

Narration: None

Generated from FirstMobile



OFFICE: Km12, Lagos-Badagry Expressway, Opposite Children's Place Plaza,
P.O. Box 100, Lagos, Nigeria. Tel: +234 8180000000
Email: info@pwanmax.com

SURVEY FEE

Sold To:

[REDACTED]


Date: Sep 15, 2023

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Guaranty Trust Bank	1	Max Assets, Otuolu	
Description				Line Total
Being payment for One (1) plot of Land at Max Assets, Otuolu.				N 150,000.00
Amount in words: One Hundred and Fifty Thousand Naira Only.				
				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:		9285sqm		

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature


...making home ownership dreams a reality

www.pwanmax.com



OFFICE: Km42, Ibeju-Lekki Expressway Opposite Children's Place Plaza,
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234-8180000552, +234-8180000637
Email: pwanmaxproperties@gmail.com

PLOT DEMARCATION

Sold

[Redacted]
VAT
08101331594

Date: Sep 15, 2023

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Guaranty Trust Bank	1	Max Assets, Otulu.	

Description	Line Total
Being payment for One(1)plot of Land at Max Assets, Otulu.	N 50,000.00
Amount in words: Fifty Thousand Naira Only.	
	Subtotal N 50,000.00
	Tax N 0.00
	Total N 50,000.00
Additional Information:	
Total Amount:	N 50,000.00
Outstanding Balance:	N 0.00
Size per Plot:	9285sqm

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature

...making home ownership dreams a reality

www.pwanmax.com