



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 (PWAN MAX) FOR FAILURE TO ALLOCATE ONE (1) RESIDENTIAL PLOT FULLY PAID FOR AT "MAX VILLE", UMUEDI, OFF IBUSA EXPRESSWAY, ASABA, DELTA STATE – ₦750,000

We write on behalf of our client (hereinafter referred to as **"the Petitioner"**) to formally petition **PWAN Group**, acting through its subsidiary **PWAN Max**, for **breach of contract, fraudulent misrepresentation, and deliberate failure** to allocate **one (1) residential plot of land** fully paid for at **Max Ville Estate**, lying and situate at **Admiralty Drive, Umuedi, Off Ibusa Expressway, Asaba, Delta State**.

FACTUAL SUMMARY

1. The Petitioner subscribed to **one (1) residential plot of land** at **Max Ville Estate, Asaba, Delta State**, marketed and sold by **PWAN Max**, a subsidiary of PWAN Group.
2. The Petitioner paid the agreed sum of **₦750,000 (Seven Hundred and Fifty Thousand Naira Only)** as the purchase price for the plot.
3. PWAN Max issued receipts and/or a Contract of Sale acknowledging this payment and promising **prompt physical allocation** of the plot.
4. Since payment, the Petitioner has **never been physically allocated** the plot, nor shown the exact location or boundaries, despite repeated follow-up efforts.

5. The Petitioner has not received valid title documents or been able to take possession or commence any development.
6. This has caused significant **financial loss, wasted time, and emotional distress**, especially as the Petitioner relied on PWAN Max's promise of genuine allocation.

ALLEGED OFFENSES

The conduct of **PWAN Max** in this matter amounts to:

- **Breach of Contract** — failure to allocate the plot as agreed;
- **Obtaining Money Under False Pretences** — contrary to **Section 419 of the Criminal Code Act**;
- **Criminal Breach of Trust** — contrary to **Section 312 of the Criminal Code Act, Cap C38, LFN 2004**;
- **Conspiracy to Defraud** — contrary to **Section 516 of the Criminal Code Act**;
- **Unfair Trade Practices and Misrepresentation** — contrary to the **Federal Competition and Consumer Protection Act (FCCPA), 2019**;
- **Advance Fee Fraud** — contrary to the **Advance Fee Fraud and Other Fraud Related Offences Act, 2006**.

RELIEFS SOUGHT

In view of the above, we respectfully request that your esteemed office:

1. Conduct a **thorough investigation** into **PWAN Max**, its directors, managers, and field agents responsible for the sale and marketing of plots at **Max Ville Estate, Asaba**.
2. Compel PWAN Max to either:
 - **Immediately allocate** the fully paid-for residential plot with valid title documents and physical possession; or
 - Refund the total sum of **₦750,000**, with accrued interest and compensation for wasted time and emotional hardship.
3. Prosecute any officers or agents found to have participated in fraudulent misrepresentation or misuse of the Petitioner's funds.
4. Enforce strong **regulatory measures** to protect other innocent buyers from similar exploitation.

ATTACHED DOCUMENTS

- Receipts or Contract of Sale showing payment of **₦750,000**;

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

PWAVE OFFICE: 3rd Flr, 3600 Eas Expressway, Oshodi (Lagos) Plot Phase
By Akinolu Oluwa, Lagos, 2018, 2019, 2020
Tel: 0818 8088888, 0818 8088888
Email: akinolu@pwave.com

Sales Receipt

Sold To: OROPOTO OCHENIMAMO OCHUAGHENE
NO 15 CLARKSON STREET,
NEWLANDS/TAKEA ROAD (TOLUBO),
1807331940

Date: Aug 20, 2020
Receipt #: 418/2020/0001
File #: PWAVE/0000000000
Comment:

Payment Method	Receiving Bank	Quantity	Estimate	Duration
Outright	Quantity Trust Bank	1	Max Villa, Asaba	

Description	Line Total
Being payment for One(1) plot of Land at Max Villa, Asaba	N 750,000.00

Amount in words:	Subtotal	Tax	Total
Seven Hundred and Fifty Thousand Naira Only,	N 750,000.00	N 0.00	N 750,000.00

Additional Information:

Total Amount:	N 750,000.00
Outstanding Balance:	N 0.00
Net per Plot:	800000

FOR PWAVE Max Properties and Business Solution
Habib Sherdeen
Signature


...making home ownership dreams a reality

www.pwave.com



QJ AND MARC BUSINESS COMPLEX, KM 42
LEKO EPE EXPRESSWAY, OPPOSITE CHILDREN'S
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS
08180000652, 07064000781

OCTOBER 13, 2021

[REDACTED]

Dear Valued Client,

**UPDATE ON ALLOCATION ACTIVITIES AT MAX VILLE PHASE I,
ASABA**

We want to use this opportunity to express our gratitude to you for choosing to purchase your property from us at PWAN Max. We acknowledge your cooperation and patience with us since we embarked on this mutually beneficial relationship of making your home ownership dream a reality.

However, we apologize for the unintended delay in the allocation of your plot(s) in the estate. The physical allocation exercise was initially scheduled to commence this month, unfortunately, it has hitherto, been affected by the resultant effect of the incessant rainfall that has characterized this season.

Nevertheless, we have decided to give this update as to the allocation of plots in the estates, in order to reassure you of our commitment towards a quick and reliable allocation of your plot(s). Thus, we crave your indulgence to please bear with us a little longer, as we work towards carrying out the physical allocation of your plots as soon as the raining season phases off, this will be between November (2021) and January (2022), kindly remember that allocation is also in Batches and on first come first served basis.

We wish to reiterate our commitment to the vision of making home ownership dream a reality of as many people as possible in Nigeria and Africa. Thank you

AUG 20th, 2020

[REDACTED]

Dear Sir

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment of N 750,000.00 for One (1) Residential Plot in Max Ville at Admiralty Road, Umuedi, Off Ibusa Expressway, Asaba area of Delta State.

Please find below the description of the allocation:

LOCATION: Umuedi Village, Admiralty Drive, Asaba, Delta State.

QUANTITY: One (1) Residential Plot of Undeveloped land

TITLE: Undeveloped parcel of Land presently under customary ownership at the Ministry of lands, Asaba, Delta State.

You are required to make the following payments:

- **Survey Fee:** To pay the sum of N 150, 000 only per plot, being the payment for your Survey Plan to be made in your name.
- **Plot Demarcation Fee:** To pay the sum of N30,000 only per plot for your plot demarcation.
- **Deed of assignment:** To pay the sum of N100,000 only per plot for your deed of assignment.
- **Development levy:** To pay the sum of N500,000 only per plot for your development levy. Payment shall be made into any Guarantee Trust Bank branch. Account Name: **PWAN MAX PROPERTY AND BUSINESS SOLUTION**, Account Number: **GTB: 0509546334**

Your provisional Survey Copies containing full details of your plot shall be made available to you after your physical allocation.

Thank you so very much for partnering with us to make home ownership dreams a reality for as many people as we possibly can.