 07077513836

 eluyefachambers@gmail.com

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 PROPERTY & BUSINESS SOLUTIONS LTD (MAX WATERS, ODEOMI PHASE 2) FOR LAND FRAUD, CRIMINAL BREACH OF TRUST, CONSPIRACY TO DEFRAUD, AND NON-ALLOCATION - ₦1,300,000

We are solicitors to the Petitioner, hereinafter referred to as “our client”, and on their behalf, we lodge this formal criminal complaint against **PWAN Max Property and Business Solutions Ltd**, its directors, project managers, and agents responsible for the marketing and sale of plots at **Max Waters Odeomi Phase 2 Waterside**, situated in **Okun-Isekun, Ibeju-Lekki, Lagos State**.

This complaint is based on conduct amounting to fraud, breach of trust, and deliberate failure to fulfil contractual obligations after collecting full payment from our client.

FACTUAL SUMMARY

1. In **2022**, our client subscribed to the purchase of a parcel of land measuring **600 square meters**, located at **Max Waters, Odeomi Phase 2, Ibeju-Lekki**, from **PWAN Max Property and Business Solutions Ltd.**
2. The transaction was based on express representations by PWAN Max that upon full payment, the land would be **physically allocated** and all necessary documentation provided.
3. Our client proceeded to pay a total sum of **₦1,300,000 (One Million, Three Hundred Thousand Naira)** broken down as follows:
 - o ₦1,000,000 for the land;
 - o ₦100,000 for the Deed of Assignment;
 - o ₦50,000 for Plot Demarcation;
 - o ₦150,000 for Survey Fees.
4. Despite fulfilling all financial obligations, and after repeated follow-up efforts both physically and through written communications, **PWAN Max has failed, refused, and/or neglected to allocate the land** or provide any form of documentation.
5. Our client has **not been shown the land**, has no site access, and has been **denied allocation for over two years**, with the company offering **no credible reason** for the delay.
6. These actions amount to deliberate fraud and misappropriation, and have caused our client **serious financial loss, mental distress, and breach of trust.**

CRIMINAL OFFENCES DISCLOSED

The conduct of **PWAN Max Property and Business Solutions Ltd** and its agents constitutes multiple criminal offences under Nigerian law, including:

- **Obtaining by False Pretence / Advance Fee Fraud** – contrary to Section 1(1)(a) & (3) of the *Advance Fee Fraud and Other Fraud Related Offences Act, 2006*;
- **Criminal Breach of Trust** – contrary to Section 312 of the *Criminal Code Act*;
- **Conspiracy to Defraud** – contrary to Section 516 of the *Criminal Code Act*;
- **Deceptive Conduct in Trade** – contrary to Section 14 of the *Federal Competition and Consumer Protection Act (FCCPA), 2019*;
- **Cheating** – contrary to Section 421 of the *Penal Code* (if applicable).

PRAYERS

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

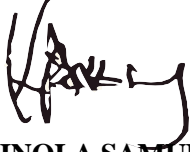
1. Initiate an urgent **criminal investigation** into the actions of PWAN Max Property and its officers;
2. **Prosecute all culpable parties**, including directors, agents, and managers found to be complicit in the fraudulent transaction;
3. **Recover and restitute** the sum of **₦1,300,000** paid by our client;
4. In the alternative, **compel the immediate allocation** of the land with supporting documentation (Deed of Assignment, Survey Plan, and Allocation Letter);
5. **Award compensation** for emotional distress, breach of trust, and two years of denial of property use;

6. Recommend **regulatory or disciplinary sanctions** to prevent recurrence and protect other potential victims.

We are prepared to submit supporting evidence, including payment receipts, communication records, and sworn affidavits, and will fully cooperate with your investigation.

Thank you for your anticipated intervention.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Akinola Samuel Eluyefa'.

AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the alleged petitioner



Koro CJ AND MARC BUSINESS COMPLEX,
KM 42
LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS
08180000652, 07064000761,

DECEMBER 13, 2022.

[REDACTED]

Dear Sir/Ma,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment of **N1,000,000 only for One (1) Residential plot of land in Max Waters Phase 2 Odeomi Located at Okun-Isekun, odeomi Ibeju Lekki.**

Please find below the description of the allocation:

LOCATION: Odeomi, Okun-Isekun, Odeomi Town Lagos State

SIZE: One (1) Residential plot of undeveloped land measuring 600 square meters.

TITLE: Undeveloped parcel of Land presently under customary ownership at the Ministry of lands.

You are required to make the following payments:

1. **Survey Fee:** To pay the sum of **N 150, 000** only for your Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of **N30,000** only for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of **N100,000** only for your Deed of Assignment.
4. **Development Fee:** To pay the sum of **N750,000** only for your Development Fee.

Payment shall be made into any **Guarantee Trust Bank** branch. Account Name: **PWAN MAX PROPERTY AND BUSINESS SOLUTION**, Account Number: **GTB: 0509546334**

Payment for Development fee shall be made into any **Polaris Bank Branch**, Account Name: **Pwan Max Construction and Building Company**, Account Number; **4091402258**.

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

Building plans are to be submitted in 2D and 3d formats to Pwan Max for consent and approval as we expect your construction to be commenced as soon as possible.

Thank you so very much for partnering with us to make home ownership dreams a reality for as many



OFFICE: Km42, Lekki Expressway Opposite Children's Plaza Plaza,
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234 8180000632, +234 8180000637
Email: pwanmaxproperties@gmail.com

Sales Receipt

Sold To:

Date:
Receipt #:
File #:
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Wema Bank	1	Max Waters Odeomi Phase 2	3Mths

Description	Line Total
Being Initial payment for One(1)plot of Land at Max Waters Odeomi Phase 2	N 500,000.00
Amount in words: Five Hundred Thousand Naira and Zero Kobo	
	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:	6005sqm

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature


...making home ownership dreams a reality

www.pwanmax.com



OFFICE: Bw42, Ikiki-Eze Enneremwae Odeomi Children's Place Phase
By Alfa Bus Stop, Sangotedo, Ajah LGA, Lagos
Tel: +234 8180900652, +234 8180900637
Email: pwanmaxproperties@gmail.com

Sales Receipt

Sold To:

Date:

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Wema Bank	1	Max Waters Odeomi Phase 2	18Mths

Description	Line Total
Being Final payment for One(1)plot of Land at Max Waters Odeomi Phase 2	N 500,000.00
Amount in words: Five Hundred Thousand Naira and Zero Kobo	
	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 0.00
Size per Plot:	600sqm

FOR PWAN Max Properties and Business Solution
Habeb Sherifdeen
Signature


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OFFICE: Km42, Ikiki Expressway Opposite Children's Place Plaza,
By Alpha Bus Stop, Sangotedo, Ajah Leko, Lagos
Tel: +234 8186006512, +234 8180000637
Email: pwanmaxproperties@gmail.com

Deed of Assignment

Sold To: [REDACTED]

Date: [REDACTED]
Receipt #:
File #:
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Guaranty Trust Bank	1	Max Waters Odeomi Phase 2	
Description			Line Total	
Bring payment for One(1)plot of Land at Max Waters Odeomi Phase 2			N 100,000.00	
Amount in words: One Hundred Thousand Naira Only.			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			6005sqm	

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature


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OFFICE: Km42, Ibeju-Lekki Expressway Opposite Children's Place Plaza,
By A15 Bus Stop, Sangrebo, Ajah Lekki, Lagos
Tel: +234 818000652, +234 818000657
Email: pwanmaxproperties@gmail.com

PLOT DEMARCATION

Sold To: [REDACTED]

Date: [REDACTED]


Receipt #: [REDACTED]

File #: [REDACTED]

Comment: [REDACTED]

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Guaranty Trust Bank	1	Max Waters Odeomi Phase 2	

Description	Line Total
Being Initial payment for One(1)plot of Land at Max Waters Odeomi Phase 2	₦ 30,000.00
Amount in words: Thirty Thousand Naira Only.	
	Subtotal ₦ 30,000.00
	Tax ₦ 0.00
	Total ₦ 30,000.00
Additional Information:	
Total Amount:	₦ 50,000.00
Outstanding Balance:	₦ 20,000.00
Size per Plot:	6005sqm

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature


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OFFICE: Km42, Lekki Expressway Opposite Children's Place Plaza,
By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234 8180000632, +234 8180000637
Email: pwanmaxproperties@gmail.com

SURVEY FEE

Sold To: [REDACTED]

Date: [REDACTED]


Receipt #: [REDACTED]

File #: [REDACTED]

Comment: [REDACTED]

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Guaranty Trust Bank	1	Max Waters Odeomi Phase 2	

Description	Line Total
Bring payment for One(1)plot of Land at Max Waters Odeomi Phase 2	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:	6005sqm

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature


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By Alfa Bus Stop, Sangotedo, Ajah Lekki, Lagos
Tel: +234 8180000632, +234 8180000637
Email: pwanmaxproperties@gmail.com


PLOT DEMARCATION

Sold To: [REDACTED]

Date: [REDACTED]
Receipt #: [REDACTED]
File #: [REDACTED]
Comment: [REDACTED]

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Waters Odeomi Phase 2	

Description	Line Total	
Being Final payment for One(1)plot of Land at Max Waters Odeomi Phase 2	N 20,000.00	
Amount in words: Twenty Thousand Naira and Zero Kobo	Subtotal	N 20,000.00
	Tax	N 0.00
	Total	N 20,000.00
Additional Information:		
Total Amount:	N 50,000.00	
Outstanding Balance:	N 0.00	
Size per Plot:	6005sqm	

FOR PWAN Max Properties and Business Solution
OYEYEMI QUAMDEEN
Signature


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CONTRACT OF SALE OF LAND

BETWEEN

**PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LTD
(VENDOR)**

AND

[REDACTED]

IN RESPECT OF ALL THAT ONE PLOT OF LAND MEASURING 600 SQUARE METERS AT MAX WATERS ODEOMI PHASE 2 WATERSIDE, SITUATED AT ODEOMI, OKUN-ISEKUN, IBEJU LEKKI LAGOS STATE.

Prepared By:

PRINCE O. WILLIAMS-JOEL ESQ.
FOR: PRINCE JOEL & ASSOCIATES
LEGAL PRACTITIONERS,
5ADOZEKCLOSE CHEVRON
DRIVE,
OFF ALTERNATIVE ROUTE,
LEKKI, LAGOS.
08034869295, 08020550410
princejolesq@yahoo.com
info@princejoel.com

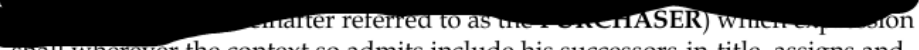
This Contract of sale Agreement is made this 14TH day of December 2022.

BETWEEN

PWAN MAX PROPERTY AND BUSINESS SOLUTIONS

LTD, a limited liability company with its head office located at KM 42 Lekki-Epe Expressway, Sangotedo, Ajah Lagos State (Herein referred to as the '**VENDOR**') which expression shall wherever the context so admits include his heirs, agents, administrators, successors-in-title and assigns.

AND

 (hereinafter referred to as the '**PURCHASER**') which expression shall wherever the context so admits include his successors-in-title, assigns and receivers of the **SECOND PART**.

WHEREAS:

- i. All that vast area of land known as "**MAX WATER ODE-OMI**", lying and situate at Odeomi Phase 2 Okun-Isekun, Ode-omi Town Lagos State. (Herein after referred to as "**The Property**") belongs to the vendor by the virtue of deed of assignment from OKUN IGBEKI COMMUNITY
- ii. The **VENDOR** is desirous of selling all its interest in the one plot of 600 square meters of the **Property** to the **PURCHASER** and the **PURCHASER** is desirous of and has agreed to purchase the one plot of 600 square meters each from **Property** from the **VENDOR** subject to Term of Contract herein appearing.

NOW IT IS HEREBY AGREED AS FOLLOWS

IN CONSIDERATION of the sum of **₦1,000,000.00 (One Million Naira) only, for One (1) Residential plot of land measuring 600 square meters** receipt of which the

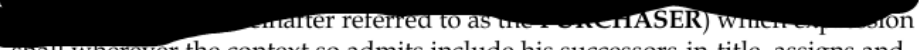
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AND

 (hereinafter referred to as the '**PURCHASER**') which expression shall wherever the context so admits include his successors-in-title, assigns and receivers of the **SECOND PART**.

WHEREAS:

- i. All that vast area of land known as "**MAX WATER ODE-OMI**", lying and situate at Odeomi Phase 2 Okun-Isekun, Ode-omi Town Lagos State. (Herein after referred to as "**The Property**") belongs to the vendor by the virtue of deed of assignment from OKUN IGBEKI COMMUNITY
- ii. The **VENDOR** is desirous of selling all its interest in the one plot of 600 square meters of the **Property** to the **PURCHASER** and the **PURCHASER** is desirous of and has agreed to purchase the one plot of 600 square meters each from **Property** from the **VENDOR** subject to Term of Contract herein appearing.

NOW IT IS HEREBY AGREED AS FOLLOWS

IN CONSIDERATION of the sum of **₦1,000,000.00 (One Million Naira)** only, for **One (1) Residential plot of land measuring 600 square meters** receipt of which the

1. *IN WITNESS OF WHICH* the parties executed this Contract of Sale *in* the manner below, day and year first above written.

THE COMMON SEAL of the within named **PWAN MAX PROPERTY AND BUSINESS SOLUTIONS LTD**, is hereby affixed.

COMMON SEAL

In the presence of:

DIRECTOR

SECRETARY

SIGNED, SEALED AND DELIVERED by the within named '**PURCHASER**'





IN PRESENCE OF:

NAME: _____

SIGNATURE: _____

ADDRESS: _____

OCCUPATION: _____