



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 ₦18,000,000.00 (EIGHTEEN MILLION NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, specifically its subsidiary **PWAN Max**, over its failure to fulfil contractual obligations relating to the allocation of land at Palms Residence Estate, Lugbe, Abuja, despite full payment.

FACTS OF THE CASE:

1. In 2023, the alleged petitioner purchased a piece of land advertised by PWAN Max at the **Palms Residence Estate**, Lugbe, Abuja, for a total sum of **₦18,000,000.00 (Eighteen Million Naira Only)**.
2. PWAN Max promised that upon completion of full payment, the land would be promptly allocated.
3. The petitioner completed the full payment on **March 20th, 2023**, with the last tranche—**₦6,000,000**—raised through a loan facility, making the petitioner financially exposed.
4. Since then, all efforts to secure the allocation of the said land have been met with **false assurances, broken promises, and a complete lack of communication** from PWAN Max.
5. The petitioner and their family have experienced **emotional distress, financial hardship, and loss of trust**, as they have been denied both access to the land and recovery of their funds.

APPLICABLE LEGAL BREACHES:

The actions of PWAN Max and its agents may constitute violations under 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 under false pretences.
3. **Federal Competition and Consumer Protection Act (FCCPA)** – Violation of consumer rights, contractual failure, and unethical business practices.

RELIEFS SOUGHT:

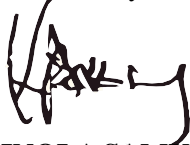
In light of the above, we respectfully request the following:

1. **Immediate investigation** into the activities of PWAN Max and its officers regarding this transaction.
2. **Full prosecution** of any party found culpable in the breach of contract or fraudulent inducement.
3. **A full refund of ₦18,000,000.00 with interest, or immediate allocation** of the agreed land at the Palms Residence Estate, Lugbe, Abuja.
4. **Public disclosure and enforcement** to protect other unsuspecting citizens from suffering similar exploitation.

ATTACHED DOCUMENTS:

- Proof of payment (including the final ~~₦~~6 million transaction)
-

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



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

Sales Receipt

Sold To

Date: Mar 20, 2023

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Fidelity Bank Plc	1	The Palms Residences Abuja- Fct	6Mths

Description	Line Total
Being Final payment for One(1)plot of Land at The Palms Residences Abuja- Fct	N 6,000,000.00
Amount in words: Six Million Naira and Zero Kobo	
	Subtotal N 6,000,000.00
	Tax N 0.00
	Total N 6,000,000.00

Additional Information;

Total Amount: N 18,000,000.00

Outstanding Balance: N 0.00

Size per Plot: 450sqm

FOR PWAN Max Properties and Business Solution

Habeeb Sherifdeen

Signature

**RE: PALMS RESIDENCE ESTATE LUGBE, FCT ABUJA PENDING ALLOCATION
AND THE WAY FORWARD**

Greetings Dear Esteemed Clients,

Further to the zoom meeting held with your kind selves on the 15th day of August, 2022 which was anchored by the Chairman Pwan Group, we express our sincerest gratitude for your presence at the meeting and as such we highly appreciate same.

Whilst we still continually thank you for your immeasurable patience on the pending allocation of The Palms Residence, we still reiterate that this pending allocation is premised on situations beyond our control however we are working tirelessly to making you happy just as was relayed by the Chairman in the meeting.

That to summarize all of the points noted in the meeting by the Chairman are herein below:

- That the revalidation of the title document which is the C of O was already at its ongoing process before the demolition occurred on the 8th of July, 2022
- That the demolition of this estate was extremely illegal and the office of the IGP are currently in the course of this investigation
- That the illegal and unauthorized demolition was verified and confirmed to be carried out by a staff of the Development Control unit who is currently taking the fall for it
- That the matter has already been filed at the Abuja High Court of which the Judge is ready to take the matter on an accelerated hearing to ensure that our partners Shimex International and Pwan Max are given back this estate speedily
- That in the course of the ongoing investigation and court matter, we have proposed an alternate land which is owned by ATV (Abuja Technology Village) FZE and is located at the 2nd entrance of where the palms residence situates
- That we are making an alternate arrangement with ATV FZE to get allocation from them



OFFICE: Km42, Ibadan Expressway Opposite Children's Place Plaza,
By Alifa Bus Stop, Surulere, Lagos State, Lagos
Tel: +234 8180000552 +234 8180000587
Email: swarmmax@swarmmax.com

Sales Receipt

Sold:

Date: Jan 20, 2022

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Fidelity Bank Plc	1	The Palms Residences Abuja- Fct	65/ths
Description				Line Total
Being Further payment for One(1)plot of Land at The Palms Residences Abuja- Fct				N 3,000,000.00
Amount in words: Three Million Naira and Zero Kobo				
				Subtotal
				N 3,000,000.00
				Tax
				N 0.00
				Total
				N 3,000,000.00
Additional Information:				
Total Amount:		N 18,000,000.00		
Outstanding Balance:		N 6,000,000.00		
Size per Plot:		450sqm		

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature


...making home ownership dreams a reality

www.pwanmax.com



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

May 10th, 2022



Dear Sir,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦3, 000,000.00 (Three Million Naira)** only, being further - payment for **One (1) Residential plot of land** measuring **450sqm** at **The Palms Residences Abuja FCT, Situated at Lugbe Opposite Shoprite FCT Abuja.**

The total cost of the plot as at the date of this payment is **₦18, 000,000.00(Eighteen Million Naira)** only, for Twelve months scheme.

The expected balance is **₦9. 000.000.00(Nine Millon Naira)** only.

You are expected to pay **₦4,500,000.00(Four Million, Five Hundred Thousand Naira)** monthly before the end of Two months, starting from the month of June 2022, which is to offset the remaining balance of **₦9, 000,000.00(Nine Millon Naira)** only.

(Note that any default in your payment shall attract extra charges).

Thank you very much for subscribing to **THE PALMS RESIDENCES** through **PWAN Max Property and Business Solution.**

Yours sincerely,

NWAIGWE FRANKLIN
General Manager
FOR: PWAN Max Property and Business Solution

Sold To

[REDACTED]

Date: May 10, 2022

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Fidelity Bank Plc	1	The Palms Residences Abuja-Fct	6Mths
Description				Line Total
Being Further payment for One(1)plot of Land at The Palms Residences Abuja- Fct				N 3,000,000.00
Amount in words: Three Million Naira and Zero Kobo				
				Subtotal N 3,000,000.00
				Tax N 0.00
				Total N 3,000,000.00
Additional Information:				
Total Amount:		N 18,000,000.00		
Outstanding Balance:		N 9,000,000.00		
Size per Plot:		450sqm		

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature




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

APRIL 4TH 2022

[REDACTED]

Dear Sir/Ma,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦3,000,000.00 (Three Million Naira)** only, being further- payment for **One (1) Residential Plot of land** measuring **450Sqm**, in **Palm Residence FCT Abuja**, Located at Lugbe Opposite Shoprite F.C.T Abuja.

The total cost of the plot as at the date of this payment is **₦18, 000, 000.00 (Eighteen Million Naira)** only, for the Six months scheme.

The expected balance is **₦12, 000, 000.00 (Twelve Million Naira)** only.

You are expected to pay **₦4,000,000.00 (Four Million Naira)** monthly, before the end of Three Months starting from the month of May 2022, which is to offset the remaining balance of **₦12,000,000.00 (Twelve Million Naira)** only.

(Note that any default in your payment shall attract extra charges).

Thank you very much for subscribing to **PALMS RESIDENCES ABUJA-FCT** through **PWAN Max Property and Business Solution**.

Yours sincerely,



Nwaigwe Franklin
Business Development Manager
FOR: PWAN Max Property and Business Solution



✓ **PWAN MAX BUSINESS COMPLEX, RM 42**
LEKKI EPE EXPRESSWAY, OPPOSITE CHILDREN'S
PLACE PLAZA, BY ALFA BUS STOP, AJAH LAGOS
☎ 08180000652, 07064000761,

FEBRUARY 17TH 2022



Dear Sir/Ma,

LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **₦3,000,000.00 (Three Million Naira)** only, being initial- payment for **One (1) Residential Plot of land** measuring **450Sq.m**, in **Palm Residence FCT Abuja**, Located at Lugbe Opposite Shoprite F.C.T Abuja.

The total cost of the plot as at the date of this payment is **₦18, 000, 000.00 (Eighteen Million Naira)** only, for the Six months scheme.

The expected balance is **₦15, 000, 000.00 (Fifteen Million Naira)** only.

You are expected to pay **₦2, 500,000.00 (Two Million, Five Hundred Thousand Naira)** monthly, before the end of six Months starting from the month of march 2022, which is to offset the remaining balance of **₦15, 000, 000.00 (Fifteen Million Naira)** only.

(Note that any default in your payment shall attract extra charges).

Thank you very much for subscribing to **PALMS RESIDENCES ABUJA-FCT** through **PWAN Max Property and Business Solution**.

Yours sincerely,



Nwaigwe Franklin
Business Development Manager
FOR: PWAN Max Property and Business Solution

 www.pwanmax.com

info@pwanmax.com, pwanmaxproperties@gmail.com

...making home ownership dream a reality

Sales Receipt

Sold To:

[REDACTED]

Date:

Apr 4, 2022

Receipt #:

[REDACTED]

File #:

Comment:

Method	Reconciling Bank	Quantity	Estate	Duration
	Fidelity Bank Plc	1	The Palms Residences Abuja-Fct	6Mths
				Line Total
er payment for One(1)plot of Land at The Palms Residences Abuja- Fct				₦ 3,000,000.00
words: Three Million Naira and Zero Kobo				Subtotal
				Tax
				Total
Information;				
unt:	₦ 18,000,000.00			
g Balance:	₦ 12,000,000.00			
ot:	450sqm			

Max Properties and Business Solution



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Tel: +234-8180000652, +234-8180000637
Email: pwanmaxproperties@gmail.com

Sales Receipt

Sold To:



Date: Feb 17, 2022

Receipt #:



File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	Fidelity Bank Plc	1	The Palms Residences Abuja- Fct	6Mths

Description	Line Total	
Being Initial payment for One(1)plot of Land at The Palms Residences Abuja- Fct	N 3,000,000.00	
Amount in words: Three Million Naira and Zero Kobo	Subtotal	N 3,000,000.00
	Tax	N 0.00
	Total	N 3,000,000.00
Additional Information:		
Total Amount:	N 18,000,000.00	
Outstanding Balance:	N 15,000,000.00	
Size per Plot:	450sqm	

FOR PWAN Max Properties and Business Solution
Habeeb Sherifdeen
Signature