



**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](mailto: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](mailto:info@pwangroup.com), [pwanpronigeria@gmail.com](mailto:pwanpronigeria@gmail.com)

## **PETITION AGAINST PWAN GROUP (PWAN PRO & PWAN MAX ASSETS) FOR FAILURE TO ALLOCATE LAND AFTER FULL PAYMENT**

We write on behalf of our client (hereinafter referred to as “the alleged petitioner”) to formally petition **PWAN Group**, and more specifically its subsidiaries **PWAN PRO** and **PWAN MAX ASSETS**, over non-allocation of land despite full payment for plots purchased over **three years ago**.

### **FACTS OF THE CASE:**

1. The petitioner purchased:
  - **Two (2) plots of land** in **Benin City** from **PWAN PRO**, and
  - **Two (2) plots of land** in **Lagos** from **PWAN MAX ASSETS**, a subsidiary of PWAN Group.
2. The total amount paid was duly acknowledged by the respective companies. Attached to this petition are:
  - **Contract of Sale**
  - **Sales Receipt**
  - **Letter of Acknowledgment**
3. Despite these documents confirming the purchase, **no land has been allocated**, and multiple follow-ups by the petitioner have been either ignored or met with excuses and delays.

4. The actions and inactions of PWAN PRO and PWAN MAX ASSETS amount to a **breach of trust, breach of contract, and possibly fraudulent misappropriation of funds.**

### **APPLICABLE LEGAL BREACHES:**

These actions violate key provisions of Nigerian law, including:

1. **Section 419 of the Criminal Code Act** – which prohibits obtaining property by false pretences.
2. **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – criminal breach of trust.
3. **Dishonest service delivery practices** under consumer protection laws and relevant real estate regulatory frameworks.

### **RELIEFS SOUGHT:**

We respectfully request that your esteemed office:

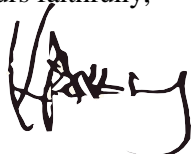
1. **Launch a formal investigation** into PWAN PRO and PWAN MAX ASSETS for breach of agreement and suspected land fraud.
2. **Prosecute any individuals** found to have engaged in criminal deceit or misappropriation.
3. **Compel a full refund** of the petitioner's payments **with interest** for the unjustified delay and emotional hardship.
4. **Take regulatory action** against the parent company (PWAN Group) to prevent further victimization of unsuspecting citizens.

### **ATTACHED DOCUMENTS:**

- Contract of Sale
  - Sales Receipt
  - Letter of Acknowledgment
- (Additional proof and communication records can be provided upon request)*

We trust that this petition will receive urgent and appropriate action in accordance with the Commission's mandate to protect citizens from financial and economic crimes.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'H. A. O.' or similar, written in a cursive style.

**AKINOLA SAMUEL ELUYEFA ESQ**

*Principal Partner/Investor Partner*

**ELUYEFA CHAMBERS**

*On behalf of the Alleged Petitioner*

**CONTRACT OF SALE OF LAND**

**BETWEEN**

**PWAN MAX PROPERTY AND BUSINESS SOLUTION  
(VENDOR)**

**AND**

**[REDACTED]  
(PURCHASER)**

1. IN RESPECT OF ALL THAT ONE PLOT OF LAND MEASURING 300 SQUARE METERS, IN MAX ASSETS PHASE 2, AT ODOGBAWOJO VILLAGE, EPE, L.G.A, LAGOS STATE.

**Prepared By:**

**PRINCE O. WILLIAMS-JOEL ESQ.**  
FOR: PRINCE JOEL & ASSOCIATES  
LEGAL PRACTITIONERS,  
SADOZEK CLOSE CHEVRON  
DRIVE,  
OFF ALTERNATIVE ROUTE,  
LEKKI, LAGOS.  
08034869285, 08020550410  
[princejoel@guiso.com](mailto:princejoel@guiso.com)  
[info@princejoelandassociates.com](mailto:info@princejoelandassociates.com)  
[www.princejoelandassociates.com](http://www.princejoelandassociates.com)



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

November 12<sup>th</sup> 2021

Dear Sir,

### PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your payment of N750,000.00 (Seven Hundred and Fifty Thousand Naira) only for One (1) Residential Plot of land in Max Assets Phase 2 Epe, located at Odogbawojo Village, Epe Lagos State.

Please find below the description of the allocation:

**LOCATION:** Odogbawojo Village, Epe, Lagos State

**QUANTITY:** One (1) Residential Plot of Undeveloped land measuring 300sqm.

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

You are required to make the following payments:

1. **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.
2. **Plot Demarcation Fee:** To pay the sum of N30,000.00 plot for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of N100,000 only per plot for your Deed of Assignment.
4. **Development Fee:** To pay the sum of N500,000 only per plot 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**



Contact Address: Cdv Court 1, Oppsite Catholic Church Of The  
Epiphany, Ologolo Road , Lekki Lagos.  
Phone: 08181888837  
Whatsapp: 08181888835  
Email Address: pwanpronigeria@gmail.com

### Sales Receipt

Sold to:

Date: 16/12/2021

Receipt #:

File #:

Payment Method		Reconciling Bank	Land Location		Duration
FINAL		ZENITH BANK	ZION GARDENS BENIN 2		3MONTHS
Qty	Size #	Description	Amount	Discount	Line Total
1.00	450Sqm	Final Payment for Half (0.5) plot, 450sqm land in ZION GARDENS Phase 2 Estate Benin.	380,000.00		380,000.00
			Total Discount		



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

## Sales Receipt

Date: Nov 12, 2021  
Receipt #:  
File #:  
Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Assets Phase2, Epe	3Mths

Description	Line Total
Being Initial payment for One(1)plot of Land at Max Assets Phase2,Epe.	N 100,000.00
Amount in words: One Hundred Thousand Naira and Zero Kobo	
	Subtotal N 100,000.00
	Tax N 0.00
	Total N 100,000.00
Additional Information:	
Total Amount:	N 1,500,000.00
Outstanding Balance:	N 1,400,000.00
Size per Plot:	600Sqm

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,

NOVEMBER 12, 2021

Dear Sir/Ma,

### LETTER OF ACKNOWLEDGEMENT

This is to acknowledge the receipt of your payment of **N100,000.00(One Hundred Thousand Naira)** only, being Initial-payment for **One (1) Residential plot of land** measuring **600sqm**, in **MAX ASSETS PHASE 2,EPE**, situated at Odogbawojo Village Epe ,Lagos State.

The total cost of the plot as at the date of this payment is **N1, 500,000.00 (One Million, Five Hundred Thousand Naira)** only, for the Three months scheme.

The expected balance is **N 1, 400,000.00 (One Million, Four Hundred Thousand Naira)** only.

You are expected to pay **N 700,000.00 (Seven Hundred Thousand Naira)** monthly, before the end of two Months Starting from the month of December 2021, which is to offset the remaining balance of **N 1, 400,000.00 (One Million, Four Hundred Thousand Naira)** only.

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

Thank you very much for subscribing to **MAX ASSETS PHASE 2, EPE** through **PWAN Max Property and Business Solution**.



16<sup>TH</sup> DECEMBER, 2021

LAGOS:  
08026001237

Dear Sir,

**PAYMENT NOTIFICATION LETTER**

Sequel to your final payment of **₦380,000.00 (Three Hundred and Eighty Thousand Naira)** which makes it a total of **₦1,080,000.00 (One Million Eighty Thousand Naira)** for **Half (0.5) Residential Plot** of Land at **Zion Gardens 2** situate at **Eghobaye Community off Sapele Road, Benin City, Edo State**.

**Please find below the description of the Land (s) you purchased:**

**LOCATION:** Eghobaye Community off Sapele Road, Benin City, Edo State.

**TYPE/SIZE:** Half (0.5) Residential Plot of undeveloped parcel of Land measuring **450sqm**.

**TITLE:** Deed of Assignment and Survey

**You are required to make the following payments:**

1. **Provisional Survey Plan Fee:** To pay the sum of **₦50,000** only, being the cost for your Provisional Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of **₦30,000** only, for your plot demarcation.

Now

Dear Sir,

**PAYMENT NOTIFICATION LETTER**

Sequel to the receipt of your payment of **₦750,000.00 (Seven Hundred and Fifty Thousand Naira)** only for **One (1) Residential Plot** of land in **Max Assets Phase 2 Epe**, located at **Odogbawojo Village, Epe Lagos State**.

**Please find below the description of the allocation:**

**LOCATION:** Odogbawojo Village, Epe, Lagos State

**QUANTITY:** One (1) Residential Plot of Undeveloped land measuring **300sqm**.

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

**You are required to make the following payments:**

1. **Survey Fee:** To pay the sum of **₦150,000** only per plot, being the payment for your Survey Plan to be made in your name.
2. **Plot Demarcation Fee:** To pay the sum of **₦30,000.00** plot for your plot demarcation.
3. **Deed of Assignment Fee:** To pay the sum of **₦100,000** only per plot for your Deed of Assignment.
4. **Development Fee:** To pay the sum of **₦750,000** only per plot for your Development Fee.

Guarantee Trust Bank branch, Account Name: **PWAN MAX PROPERTY AND**



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

## Sales Receipt

Sold To

08026001237

Date: Nov 12, 2021

Receipt #:

File #:

Comment:

Payment Method	Reconciling Bank	Quantity	Estate	Duration
Outright	United Bank of Africa	1	Max Assets Phase 2, Epe	

Description	Line Total
Being payment for One(1)plot of Land at Max Assets Phase 2, Epe.	N 750,000.00
Amount in words: Seven Hundred Fifty Thousand Naira and Zero Kobo	
	Subtotal N 750,000.00
	Tax N 0.00
	Total N 750,000.00

### Additional Information;

Total Amount: N 750,000.00

Outstanding Balance: N 0.00

Size per Plot: 300Sqm