



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

PETITION AGAINST PWAN FOR FAILURE TO ALLOCATE LAND AFTER PAYMENT OF ₦700,000 FOR TWO PLOTS AT OCEANVIEW BY LIGHTHOUSE PHASE 3

We write on behalf of our client (hereinafter referred to as “*the alleged petitioner*”) to formally petition **PWAN** for **fraudulent misrepresentation, breach of contract, and financial misconduct** regarding the sale of land at Oceanview by Lighthouse Phase 3, which remains unallocated despite full payment.

FACTS OF THE CASE:

- In **late 2023**, the petitioner was approached by a **PWAN agent**, who promoted **Oceanview by Lighthouse Phase 3** as a lucrative investment opportunity.
- Trusting the representation, the petitioner paid:
 - **₦250,000** for one (1) full plot
 - **₦450,000** for one (1) half plot
 - Bringing the total paid to **₦700,000**
- PWAN issued only **sales receipts and a contract of sale**.
- To date, **no physical allocation** of either plot has been made.
- Despite **multiple phone calls and visits** to their office, PWAN failed to provide any definite response, only citing vague reasons such as “batch allocation.”
- This prolonged silence and inaction represent a deliberate evasion of contractual responsibility.

APPLICABLE LEGAL BREACHES:

The conduct of PWAN contravenes:

- **Section 419 of the Criminal Code Act** – Obtaining money under false pretences
 - **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – Criminal breach of trust
 - **Federal Competition and Consumer Protection Act** – Failure to deliver service as advertised
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RELIEFS SOUGHT:

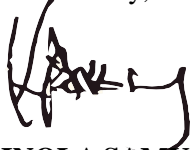
We respectfully request that your esteemed office:

1. **Initiate a formal investigation** into PWAN's dealings at Oceanview by Lighthouse Phase 3
 2. **Compel PWAN** to refund the full sum of **₦700,000**, with interest to reflect the time and opportunity lost
 3. **Prosecute all responsible agents** and managers for fraudulent misrepresentation
 4. **Prevent further exploitation** of other potential buyers by ensuring regulatory oversight of their operations
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ATTACHED DOCUMENTS:

- Sales Receipts (₦250,000 + ₦450,000)
- Contract of Sale
- Record of Communication (if available)

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ
Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner



Making home ownership dream a reality...

+234 808 7777 729, +234 803 0907 528
pwanlighthouse@gmail.com
pwanlighthouse

3rd November, 2023.

Abuja.

Dear Madam,

PAYMENT NOTIFICATION LETTER

Sequel to the receipt of your duly signed subscription form and receipt of the payment of N450,000.00 (Four Hundred and Fifty Thousand Naira) only for the subscription and purchase of Half (1/2) residential plot of land measuring 300sqm at OCEAN VIEW PHASE 3 BY LIGHTHOUSE, please find below the description of the land you purchased:

LOCATION: ODE-OMI, IBEJU-LEKKI LOCAL GOVERNMENT AREA, LAGOS STATE.

TYPE/SIZE: Half (1/2) residential plot of undeveloped land measuring 300sqm

TITLE: Registered Survey

You will be expected to pay the under listed fees at any time before or after physical allocation towards perfecting your title to the said plots and taking effective possession thereof; pursuant to Clause Q10 & Q11 of your subscription form:

1. Survey Plan Fee: N60,000 only.
2. Plot Demarcation Fee: N60,000 only.



28, Nicholas Road, Off Brasserie, Abuja, Abuja State
Tel: +234 808 7777 729, +234 803 0907 528
Email: pwanlighthouse@gmail.com

Sales Receipt

Sold to:
Address:
Phone:
Email:

[Redacted]

Date: 3/10/2023
Receipt #: [Redacted]
File #: [Redacted]

PAYMENT PLAN		RECONSTRUCTING BANK	PAYMENT	ESTATE	DURATION
QTY	Size (Sq.m)				
		UNITED BANK OF AFRICA	TRANSFER	OCEAN VIEW BY LIGHTHOUSE P3	3 MONTHS
		Description	Amount Paid	Instal. Per plot	Long Total
0.50	300	Initial Payment for Half(1/2) Residential plot of land at Ocean View By Lighthouse Phase 3	200,000	400,000	200,000.00

Amount in words: Two Hundred Thousand Naira Only.

Subtotal 200,000.00
Sales Tax Total 200,000.00

Total Amount N 450,000.00
Outstanding Bal: N 250,000.00

FOR PWAN Lighthouse Limited



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Transaction Reference NXGI1804402222