



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 FULL LAND AND DOCUMENTATION FEES**

We write on behalf of our client (hereinafter referred to as —the alleged petitioner) to formally petition **PWAN Group**, particularly the subsidiary company involved in land transactions in Ibeju Lekki, Lagos, for failing to allocate land despite full payment for both the land and associated documentation.

FACTS OF THE CASE:

1. The alleged petitioner purchased **one (1) plot of land** from PWAN Group in **Ibeju Lekki, Lagos**.
2. Full payment was made for both:
 - o The **cost of the land**, and
 - o The **required documentation fees** (typically including survey, deed of assignment, and allocation fee).
3. Despite fulfilling all financial obligations, the alleged petitioner has **not received physical allocation of the land** to date.
4. Multiple attempts to follow up have resulted in **no resolution**, and the petitioner has been left in uncertainty, unable to access or use the property.

APPLICABLE LEGAL BREACHES:

The ongoing failure by PWAN Group to fulfill its obligations constitutes:

1. **Criminal Breach of Trust** under **Section 312 of the Criminal Code Act, Cap C38, LFN 2004**
2. **Obtaining by False Pretence** under **Section 419 of the Criminal Code Act**
3. Violation of the **Federal Competition and Consumer Protection Act (FCCPA)** regarding fair service and product delivery

RELIEFS SOUGHT:

We respectfully request the following:

1. That your office **investigate PWAN Group** for breach of contract and possible fraudulent practices in land transactions.
2. That the company be compelled to **immediately allocate the purchased plot**, including the survey and title documentation already paid for.
3. If allocation is no longer feasible, we request a **full refund of the land and documentation fees** with applicable interest.
4. That **sanctions or regulatory oversight** be enforced to prevent recurrence of this pattern affecting other land buyers.

ATTACHED DOCUMENTS (if available):

- Contract of Sale
- Receipt for Land Payment
- Receipt for Documentation Fees

We request that this petition be treated with urgency to protect the rights and investments of citizens who have transacted in good faith.

Yours faithfully,



AKINOIA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

Debit: [321XXXX661](#) Amt:
NGN530,000.00 Date: 11-OCT-[2024](#)
[10](#):47:12 Desc:
PHUB:OUTWARD[0566234-0](#)_PWAN
LIGHTHOUSE LI. Bal:

FirstBank Since 1984

TYPE OF TRANSFER ☐ Other Bank Transfer (Instant) ☐ Transfer to First Bank Accounts (NGN/FCY) ☐ RTGS ☐ Bank Draft Issuance

AA2 1103089

Originating Branch Ikoro

Sender's Name [REDACTED]

Total Amount in figures/word 530,000.00 ₦

Transaction Date 11/10/2024

Sender's Account Number [REDACTED]

DETAILS OF BENEFICIARY A

Name PWANA LIGHTHOUSE LIMITED

Account Number 1023873477

Amount / Bank 530,000.00

Officer's Name, Signature and Date _____

DETAILS OF BENEFICIARY B

Name _____

Account Number _____

Amount / Bank _____

Officer's Stamp _____

PWANA LIGHTHOUSE

OCEAN VIEW

BY LIGHTHOUSE Phase 2

SUBSCRIPTION FORM

NOTE: Instant plot reservation and allocation for subscribers

TYPE OF PLOTS: ☒ RESIDENTIAL ☐ COMMERCIAL (ATTRACTS 10%) ☐ CORNER PIECE PLOT(S) (ATTRACTS 10%)

PAYMENTS: ☐ OUTRIGHT ☒ INSTALLMENT

NUMBER OF PLOTS: 1 PLOT SIZE: ☐ 300SQM ☐ 450SQM ☒ 600SQM

Kindly fill the form with correct details and well spelt names as any subsequent corrections issued documents occasioned by any mistake in filling this form will attract correction fees

SECTION 1: SUBSCRIBERS DETAILS

TITLE Mr

NAME [REDACTED]

DATE OF BIRTH: 11/10/1996 GENDER: ☒ MALE ☐ FEMALE

ADDRESS [REDACTED]

(RESIDENTIAL ADDRESS IN CASE OF INDIVIDUAL AND REGISTERED BUSINESS ADDRESS)

[REDACTED]

CONTRACT OF SALE

BETWEEN

PWAN LIGHTHOUSE LIMITED

RC NO: 1751168

(VENDOR)

AND



(PURCHASER)

**IN RESPECT OF ONE (1) RESIDENTIAL PLOT OF LAND
MEASURING 60 SQM AT OCEAN VIEW BY LIGHTHOUSE**