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To:

The Officer-in-Charge
Economic and Financial Crimes Commission (EFCC)
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CC:

The Managing Director
PWAN Group
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Opposite Lagos State University (LASU)
Oko Ado, Ajah, Lagos State
Nigeria
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**PETITION AGAINST PWAN LIGHTHOUSE (PWAN GROUP) FOR LAND FRAUD,
NON-ALLOCATION, AND BREACH OF CONTRACT – ₦605,000 TOTAL
MONETARY LOSS**

We write to formally petition **PWAN LIGHTHOUSE**, a subsidiary of the **PWAN GROUP**, for engaging in fraudulent real estate practices, misrepresentation, and breach of contractual obligations in connection with the sale of land at Ocean View Estate, Ode-Omi, Ibeju Lekki, Lagos State.

Despite receiving a total of **₦605,000** from three (3) clients since August 2023 for the purchase of plots at the said estate, **PWAN LIGHTHOUSE** has failed, refused, and/or neglected to carry out physical allocation or provide any valid supporting documents to date. This persistent failure constitutes a deliberate attempt to defraud and has caused financial and emotional distress to the affected purchasers.

DETAILED FACTS OF THE CASE

1. Sometime in **August 2023**, three clients purchased plots of land from **PWAN LIGHTHOUSE** at **Ocean View Estate, Ode-Omi**, located in **Ibeju Lekki, Lagos State**, with each buyer believing that allocation would be carried out promptly.
2. The total amount paid by the three clients amounted to **₦605,000**, which was made through direct bank transfers to accounts provided by PWAN LIGHTHOUSE agents and representatives.
3. To date, despite repeated follow-ups, visits to PWAN offices, and verbal promises made by their agents, **no physical allocation of the purchased plots has occurred**, nor have any official documents (such as receipts, allocation letters, or survey plans) been issued to the buyers.
4. The prolonged delay and consistent excuses from PWAN LIGHTHOUSE indicate **gross negligence, bad faith**, and a **pattern of deception** aimed at exploiting unsuspecting real estate investors.
5. This behavior mirrors several other complaints against the PWAN GROUP, suggesting a **systemic scheme of land fraud** under the guise of legitimate real estate investment.

APPLICABLE LEGAL BREACHES

The conduct of PWAN LIGHTHOUSE and/or its agents amounts to the following violations under Nigerian law:

- **Advance Fee Fraud** – Section 419, Nigerian Criminal Code Act.
- **Criminal Breach of Trust** – Section 312, Criminal Code Act.
- **False Representation and Deceptive Marketing** – Section 14, FCCPA 2019.
- **Breach of Contract** – For failure to deliver allocation and documentation as agreed.

RELIEFS SOUGHT

In view of the above, we respectfully urge the relevant investigative and regulatory authorities to:


1. **Initiate a criminal and civil investigation** into the activities of PWAN LIGHTHOUSE and its executives.
2. **Compel immediate physical allocation** of the plots at Ocean View Estate, Ode-Omi, along with issuance of valid documentation (including allocation letters, survey plans, and receipts).
3. In the alternative, **order a full refund of ₦605,000** to the affected clients, along with statutory interest and compensation for undue delay and distress.
4. **Prosecute all parties** found to have participated in the fraudulent misrepresentation and misappropriation of client funds.
5. **Blacklist PWAN LIGHTHOUSE** from further land sales and real estate marketing until restitution is made and regulatory compliance is established.

ATTACHED DOCUMENTS (EVIDENCE)

1. Payment receipts and/or bank statements confirming ~~₦~~605,000 in total transfers.

We request urgent action to halt this pattern of real estate fraud and protect other unsuspecting Nigerians from falling victim to similar schemes.

Yours faithfully,



AKINOLA SAMUEL ELUYEFA ESQ

Principal Partner/Investor Partner

ELUYEFA CHAMBERS

On behalf of the Alleged Petitioner

