IN THE HIGH COURT FOR ZAMBIA
AT THE PRINCIPAL REGISTRY
HOLDEN AT LUSAKA
(Civil Jurisdiction)

2026/HP/EP/014

IN THE MATTER OF: ARTICLE 73 OF THE CONSTITUTION OF ZAMBIA

AND

IN THE MATTER OF: SECTIONS 81, 83, 84, 97, 98, & 100 OF THE ELECTORAL PROCESS ACT NO. 35 OF 2016

AND

IN THE MATTER OF: REGULATION 15 OF THE ELECTORAL CODE OF CONDUCT, 2016

AND

IN THE MATTER OF: THE HIGH COURT (ELECTION PETITION) RULES, 2026 S.I NO 31, OF 2016

AND

IN THE MATTER OF: THE PARLIAMENTARY ELECTION FOR CHONGWE EAST CONSTITUENCY DECLARED ON 15TH AUGUST, 2026

BETWEEN:

SYLVIA TEMBO MASEBO PETITIONER

AND

ANITA KAMANGA FIRST RESPONDENT

ELECTORAL COMMISSION OF ZAMBIA SECOND RESPONDENT

REPUBLIC OF ZAMBIA
HIGH COURT OF ZAMBIA
07 SEP 2026
PRINCIPAL REGISTRY 4
P.O. BOX 50067 LUSAKA

2ND RESPONDENT'S AFFIDAVIT IN OPPOSITION

I, JOHN MUSAULULE LUNGU, of Chongwe Ibex, Plot 12 89 in the Chongwe District of Lusaka Province in the Republic of Zambia do hereby make OATH and SAY as follows:

1. That my particulars are as stated above.
2. That I am a Zambian National.
3. That I was the Returning Officer for Chongwe East Constituency during the 13th August elections and by reason thereof, I am competent to depose to this my Affidavit from facts within my knowledge and virtue of my position.
4. That on 15th August, 2026, I declared the First Respondent as the duly elected Member of Parliament for Chongwe East with 16,058 votes. There is now produced and shown to me a true copy4 of the Gen 20 form issued in this regard marked "**JML1**"

5. That the elections were free and fair and the 1st Respondent was and is the duly elected Member of Parliament for Chongwe East Constituency.
6. That I depose to the facts above verily believing the same to be true and correct to the best of my knowledge and belief.

SWORN by the said **JOHN MUSAULULE) LUNGU** at Lusaka this 7) Day of Sept 2026)

DEPONENT'S SIGNATURE

COMMISSIONER FOR OATHS

REPUBLIC OF ZAMBIA
HIGH COURT OF ZAMBIA
07 SEP 2026
COMMISSIONER FOR OATHS
P.O. BOX 50067, LUSAKA

IN THE HIGH COURT FOR ZAMBIA 2026/HP/EP/014
AT THE PRINCIPAL REGISTRY
HOLDEN AT LUSAKA
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SYLVIA TEMBO MASEBO PETITIONER

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ELECTORAL COMMISSION OF ZAMBIA SECOND RESPONDENT

REPUBLIC OF ZAMBIA HIGH COURT OF ZAMBIA 07 SEP 2026 PRINCIPAL REGISTRY P.O. BOX 50067, LUSAKA

CERTIFICATE OF EXHIBIT

This is the exhibit referred to in the Affidavit of one **JOHN MUSAULULE) LUNGU** marked as "**JML1**"

Dated the 7 day of Sept 2026

COMMISSIONER FOR OATHS

REPUBLIC OF ZAMBIA HIGH COURT OF ZAMBIA 07 SEP 2026 COMMISSIONER FOR OATHS 1 P.O. BOX 50067, LUSAKA

"STM 1" "JMC 1"

REPUBLIC OF ZAMBIA

ELECTORAL COMMISSION OF ZAMBIA

THE Electoral Process Act, 2016

(Act No. 35 of 2016)

The Electoral Process (General) Regulation, 2021

GEN 20b
[Regulation 50(2)]
(complete in triplicate)

DECLARATION OF THE RESULTS OF THE POLL - Member of Parliament

I, LUNGU JOHN being the Returning Officer for CHONGWE EAST Constituency, CHONGWE District, do hereby declare that I have, inaccordance with the law, ascertained the results of the poll in the said constituency and that they have been given to:

Name of Candidate	Political Party	Votes	Votes (in words)
KAMANGA Anita	IND	16,058	Sixteen Thousand and Fifty-Eight
MASEBO T Sylvia	UPND	6,798	Six Thousand Seven Hundred and Ninety-Eight
CHUMBWE Geoffrey	NRPUP	3,185	Three Thousand One Hundred and Eighty-Five
MWANZA Robster	RP	85	Eighty-Five

I further declare that a total of 814 ballot papers have been rejected as invalid and that a total of 26,940 Votes were cast.

I therefore declare that the said KAMANGA Anita to be this day duly elected as Member of Parliament for CHONGWE EAST Constituency.

Dated this 14 day of August, 2026 Signature: .....

Witnessed by:

Name	Organisation	Signature	Name	Organisation	Signature
BENSON	INDEPEND				
Oliver Kachaka	NRPUP				
ELIJAH SIAKWAI	GENIUS				
VICTOR CHAMBALA	AWOKEN				
SANDY SAKWA	PSTS FELLOWS				
DALITSO NGA	ZAMRO				
THOMAS PHIRI	UPND				

1. This form must be completed in sufficient quantities to give one copy to each candidate or their polling agent by the Returning Officer. The Returning Officer must read out aloud the text from the original to the public at the place where the totalling of the votes takes place.
2. The full names of the candidates, party and votes received in figures and words must be inserted in the columns above, with the successful candidate's name at no. 1.
3. The original of this form must be delivered to the Electoral Commission of Zambia by the quickest possible means and a copy must be retained by the Returning Officer.

CamScanner

IN THE HIGH COURT FOR ZAMBIA
AT THE PRINCIPAL REGISTRY
HOLDEN AT LUSAKA
(Civil Jurisdiction)

2026/HP/EP/014

IN THE MATTER OF: ARTICLE 73 OF THE CONSTITUTION OF ZAMBIA

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IN THE MATTER OF: THE PARLIAMENTARY ELECTION FOR CHONGWE EAST CONSTITUENCY DECLARED ON 15TH AUGUST, 2026

BETWEEN:

SYLVIA TEMBO MASEBO PETITIONER

AND

ANITA KAMANGA FIRST RESPONDENT

ELECTORAL COMMISSION OF ZAMBIA SECOND RESPONDENT

REPUBLIC OF ZAMBIA
HIGH COURT OF ZAMBIA
07 SEP 2026
PRINCIPAL REGISTRY 4
P.O. BOX 50067 LUSAKA

2ND RESPONDENT'S AFFIDAVIT IN OPPOSITION

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1. That my particulars are as stated above.
2. That I am a Zambian National.
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4. That on 15th August, 2026, I declared the First Respondent as the duly elected Member of Parliament for Chongwe East with 16,058 votes. There is now produced and shown to me a true copy4 of the Gen 20 form issued in this regard marked "**JML1**"

5. That the elections were free and fair and the 1st Respondent was and is the duly elected Member of Parliament for Chongwe East Constituency.
6. That I depose to the facts above verily believing the same to be true and correct to the best of my knowledge and belief.

SWORN by the said **JOHN MUSAULULE) LUNGU** at Lusaka this 7) Day of Sept 2026)

DEPONENT'S SIGNATURE

COMMISSIONER FOR OATHS

REPUBLIC OF ZAMBIA
HIGH COURT OF ZAMBIA
07 SEP 2026
COMMISSIONER FOR OATHS
P.O. BOX 50067, LUSAKA

IN THE HIGH COURT FOR ZAMBIA 2026/HP/EP/014
AT THE PRINCIPAL REGISTRY
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BETWEEN:

SYLVIA TEMBO MASEBO PETITIONER

AND

ANITA KAMANGA FIRST RESPONDENT

ELECTORAL COMMISSION OF ZAMBIA SECOND RESPONDENT

REPUBLIC OF ZAMBIA HIGH COURT OF ZAMBIA 07 SEP 2026 PRINCIPAL REGISTRY P.O. BOX 50067, LUSAKA

CERTIFICATE OF EXHIBIT

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Dated the 7 day of Sept 2026

COMMISSIONER FOR OATHS

REPUBLIC OF ZAMBIA HIGH COURT OF ZAMBIA 07 SEP 2026 COMMISSIONER FOR OATHS 1 P.O. BOX 50067, LUSAKA

"STM 1" "JMC 1"

REPUBLIC OF ZAMBIA

ELECTORAL COMMISSION OF ZAMBIA

THE Electoral Process Act, 2016

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Name of Candidate	Political Party	Votes	Votes (in words)
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CHUMBWE Geoffrey	NRPUP	3,185	Three Thousand One Hundred and Eighty-Five
MWANZA Robster	RP	85	Eighty-Five

I further declare that a total of 814 ballot papers have been rejected as invalid and that a total of 26,940 Votes were cast.

I therefore declare that the said KAMANGA Anita to be this day duly elected as Member of Parliament for CHONGWE EAST Constituency.

Dated this 14 day of August, 2026 Signature: .....

Witnessed by:

Name	Organisation	Signature	Name	Organisation	Signature
BENSON	INDEPEND				
Oliver Kachaka	NRPUP				
ELIJAH SIAKWAI	GENIUS				
VICTOR CHAMBALA	AWOKEN				
SANDY SAKWA	PSTS FELLOWS				
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THOMAS PHIRI	UPND				

1. This form must be completed in sufficient quantities to give one copy to each candidate or their polling agent by the Returning Officer. The Returning Officer must read out aloud the text from the original to the public at the place where the totalling of the votes takes place.
2. The full names of the candidates, party and votes received in figures and words must be inserted in the columns above, with the successful candidate's name at no. 1.
3. The original of this form must be delivered to the Electoral Commission of Zambia by the quickest possible means and a copy must be retained by the Returning Officer.

CamScanner

IN THE HIGH COURT FOR ZAMBIA 2026/HP/EP014
AT THE PRINCIPAL REGISTRY
HOLDEN AT LUSAKA
(Civil Jurisdiction)

IN THE MATTER OF: ARTICLE 73 OF THE CONSTITUTION OF ZAMBIA
AND
IN THE MATTER OF: SECTIONS 81, 83, 84, 97, 98 & 100 OF THE ELECTORAL PROCESS ACT NO. 35 OF 2016
AND

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AND
IN THE MATTER OF: THE PARLIAMENTARY ELECTION FOR CHONGWE EAST CONSTITUENCY DECLARED ON 15TH AUGUST 2026

BETWEEN:

REPUBLIC OF ZAMBIA
HIGH COURT OF ZAMBIA
14 SEP 2026
P.O. BOX 50067

SYLVIA TEMBO MASEBO PETITIONER
AND
ANITA KAMANGA FIRST RESPONDENT
ELECTORAL COMMISSION OF ZAMBIA SECOND RESPONDENT

AFFIDAVIT IN REPLY TO THE FIRST RESPONDENT'S AFFIDAVIT IN OPPOSITION

I, SYLVIA TEMBO MASEBO, a Zambian Nationals of Plot No. 1688, 1st Street, Ibex Hill, Lusaka in the Lusaka Province of the Republic of Zambia, do hereby make OATH and SAY as follows:

1. That my full names, nationality, and residential addresses are as stated above.

2. That I am the Petitioner herein and by reason thereof I am competent to depose to this my affidavit from facts and information which came to me by virtue of my said position.

3. That I have read the First Respondent's affidavit in opposition and respond as follows.

4. That contrary to the First Respondent's assertions, the Second Respondent's Conflict Management Committee minutes identify Mr. Amos Malubila and the First Respondent as respondents to a complaint of character assassination made in relation to my candidature. There is now produced and shown to me marked "STM1" a true copy of the minutes of the Conflict Management Committee.

5. That the said minutes further record that Mr. Amos Malubila acknowledged that he was the person speaking in the video complained about and that he was acting as the campaign manager for the First Respondent, and that he undertook to retract the statement and have the video deleted from social media.

6. That notwithstanding the said mediation and undertaking, the allegation that I was a thief who had stolen or hidden 61 containers of medicine was not retracted but was thereafter repeatedly published on Facebook pages promoting and supporting the First Respondent's candidature.

7. That by the First Respondent's own admission, her purported charitable activities and campaign-related material were published on Facebook pages styled "SOLI TV", "Soli TV > Soli language and its people", "Chongwe 'Youth Advocate'" other Facebook pages.

8. That contrary to the First Respondent's assertions that she had no knowledge of the said social media pages, they are her followers of the First Respondent on Facebook and have been consistently promoting her candidature before and during elections demonstrating a link between them and the First Respondent. There is now produced and shown to me collectively marked "STM2" true copies of the relevant social media followings and associations relating to the said media outlets.

9. That the motor vehicle bearing registration number ALE 3458 was involved in the First Respondent's campaign activities, and the injuries sustained by Mr. Patrick Mudima and Mr. Musopelo Tiza arising from the relevant incident were reported to and recorded by the Police. produced and shown to me collectively marked "STM3" true photographs and video recordings relating to the said vehicle.

10. That the First Respondent admits that she was present in Chongwe District on 17th July 2026 and in the Bunda Bunda area on 23rd July 2026 and further admits that confrontations occurred involving persons associated with the respective campaigns.

11. That the First Respondent's reliance on the campaign timetable does not alter the information given to me relating to the incidences of violence experienced by members of my campaign team who were attacked by the members of the First Respondent's campaign with her knowledge, consent or approval as shown in the various medical reports. There is now produced and shown to me marked "STM4" true copies of the said medical reports.

12. That on 23rd July 2026, members of my campaign team were conducting road mobilisation in a Fuso truck in the Bunda Bunda area of Kapete Ward when their vehicle was blocked by a Toyota Prado bearing the First Respondent's campaign images, a black Toyota Harrier and another Fuso truck associated with the First Respondent's campaign.

13. That I am informed by members of my campaign team who were present during the incident, and verily believe the information to be true, that the First Respondent was present at the scene, alighted from the black Toyota Harrier and handed pepper spray to a person identified as Oliver, who thereafter sprayed members of my campaign team, causing confusion and forcing several of them to flee.

14. That the First Respondent does not deny knowing the persons identified as Oliver, Gift and Malambo. Instead, she asserts that she did not appoint them as her campaign managers or polling agents.

15. That I am informed by Ms. Queen Semu, who was present during the relevant events, and verily believe the information to be true, that the First Respondent's campaign team stopped and threw K50.00 notes towards members of my mobilization team and members of the public while soliciting electoral support.

16. That Ms. Semu further informs me that persons present, including herself, Mr. Samson Phiri and Mr. Aaron Mwambi, picked up or received K50.00 notes during the said incident.

17. That I verily believe that the distribution of money and foodstuffs during the active campaign period and immediately before polling was calculated to influence the electoral choice of the recipients in favour of the First Respondent.

18. That I further verily believe that the intention behind the distribution of money to persons associated with my campaign was to persuade them, and through them others, to vote for the First Respondent.

19. That despite the First Respondent's election symbol, she was not entitled to distribute plates in the constituency during the campaign period as the majority of the voters, as admitted by the First Respondent herself are in a rural set up and a gift is taken as soliciting votes.

20. That the First Respondent could have conducted her campaign without distributing such items to voters and members of the public.

21. That the timing of the First Respondent's charitable activities being proximate to the campaign period, was capable of creating an electoral advantage for the First Respondent.

22. That contrary to the assertions by the First Respondent, I did not solicit for votes by giving people brown envelopes. The photograph exhibited by the First Respondent does not establish the contents of the envelopes, the date, the purpose of the event or any request that a recipient vote for me.

23. That I am advised by my advocates, which advice I verily believe to be true, that the Second Respondent's record of the totaling of votes and the GEN20 Forms relied upon by the First Respondent establish the numerical result declared at the election. The said documents do not determine or answer the allegations concerning violence, intimidation, bribery, vote buying or false campaign publications complained of in the Petition.

24. That I maintain that the incidents complained of, considered cumulatively in their timing, locations, repetition and effect upon campaign participation and voter choice, materially affected the freedom of the electoral process in Chongwe East Constituency.

25. That I am advised by my Advocates and verily believe the same to be true that the election and return of the First Respondent is liable to be avoided under section 97 of the Electoral Process Act No. 35 of 2016.

26. That I depose to the facts herein verily believing the same to be true and correct to the best of my knowledge, information and belief.

SWORN at Lsk ---------- by the said)

SLYVIA TEMBO MASEBO)

this 14 ---------- day of Sept ---------- 2026)

DEPONENT'S SIGNATURE

BEFORE ME: ----------

COMMISSIONER FOR OATHS

REPUBLIC OF ZAMBIA
HIGH COURT OF ZAMBIA
14 SEP 2026
COMMISSIONER FOR OATHS
P.O. BOX 50067, LUSAKA

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HIGH COURT OF ZAMBIA
14 SEP 2026
P.O. BOX 50067

SYLVIA TEMBO MASEBO PETITIONER
AND
ANITA KAMANGA FIRST RESPONDENT
ELECTORAL COMMISSION OF ZAMBIA SECOND RESPONDENT

AFFIDAVIT IN REPLY TO THE FIRST RESPONDENT'S AFFIDAVIT IN OPPOSITION

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9. That the motor vehicle bearing registration number ALE 3458 was involved in the First Respondent's campaign activities, and the injuries sustained by Mr. Patrick Mudima and Mr. Musopelo Tiza arising from the relevant incident were reported to and recorded by the Police. produced and shown to me collectively marked "STM3" true photographs and video recordings relating to the said vehicle.

10. That the First Respondent admits that she was present in Chongwe District on 17th July 2026 and in the Bunda Bunda area on 23rd July 2026 and further admits that confrontations occurred involving persons associated with the respective campaigns.

11. That the First Respondent's reliance on the campaign timetable does not alter the information given to me relating to the incidences of violence experienced by members of my campaign team who were attacked by the members of the First Respondent's campaign with her knowledge, consent or approval as shown in the various medical reports. There is now produced and shown to me marked "STM4" true copies of the said medical reports.

12. That on 23rd July 2026, members of my campaign team were conducting road mobilisation in a Fuso truck in the Bunda Bunda area of Kapete Ward when their vehicle was blocked by a Toyota Prado bearing the First Respondent's campaign images, a black Toyota Harrier and another Fuso truck associated with the First Respondent's campaign.

13. That I am informed by members of my campaign team who were present during the incident, and verily believe the information to be true, that the First Respondent was present at the scene, alighted from the black Toyota Harrier and handed pepper spray to a person identified as Oliver, who thereafter sprayed members of my campaign team, causing confusion and forcing several of them to flee.

14. That the First Respondent does not deny knowing the persons identified as Oliver, Gift and Malambo. Instead, she asserts that she did not appoint them as her campaign managers or polling agents.

15. That I am informed by Ms. Queen Semu, who was present during the relevant events, and verily believe the information to be true, that the First Respondent's campaign team stopped and threw K50.00 notes towards members of my mobilization team and members of the public while soliciting electoral support.

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23. That I am advised by my advocates, which advice I verily believe to be true, that the Second Respondent's record of the totaling of votes and the GEN20 Forms relied upon by the First Respondent establish the numerical result declared at the election. The said documents do not determine or answer the allegations concerning violence, intimidation, bribery, vote buying or false campaign publications complained of in the Petition.

24. That I maintain that the incidents complained of, considered cumulatively in their timing, locations, repetition and effect upon campaign participation and voter choice, materially affected the freedom of the electoral process in Chongwe East Constituency.

25. That I am advised by my Advocates and verily believe the same to be true that the election and return of the First Respondent is liable to be avoided under section 97 of the Electoral Process Act No. 35 of 2016.

26. That I depose to the facts herein verily believing the same to be true and correct to the best of my knowledge, information and belief.

SWORN at Lsk ---------- by the said)

SLYVIA TEMBO MASEBO)

this 14 ---------- day of Sept ---------- 2026)

DEPONENT'S SIGNATURE

BEFORE ME: ----------

COMMISSIONER FOR OATHS

REPUBLIC OF ZAMBIA
HIGH COURT OF ZAMBIA
14 SEP 2026
COMMISSIONER FOR OATHS
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IN THE HIGH COURT FOR ZAMBIA 2026/HP/EP014

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AND	
IN THE MATTER OF:	THE PARLIAMENTARY ELECTION FOR CHONGWE EAST CONSTITUENCY DECLARED ON 15TH AUGUST 2026

BETWEEN:

REPUBLIC OF ZAMBIA HIGH COURT OF ZAMBIA 28 AUG 2026 PRINCIPAL REGISTRY 1 P.O. BOX 50067, LUSAKA.

SYLVIA TEMBO MASEBO	PETITIONER
AND	
ANITA KAMANGA	FIRST RESPONDENT
ELECTORAL COMMISSION OF ZAMBIA	SECOND RESPONDENT

AFFIDAVIT VERIFYING FACTS

I, SYLVIA MASEBO, a Zambian Nationals of Plot No. 688, 1st Street, Ibex Hill, Lusaka in the Lusaka Province of the Republic of Zambia, do hereby make OATH and SAY as follows:

1. That our full names, nationality, and residential addresses are as stated above.

2. That I was a candidate for election as Member of Parliament for Chongwe East Constituency at the Parliamentary election held on 13th August 2026 and was also a registered voter entitled to vote in the said election.

3. That the First Respondent, Anita Kamanga, was also a candidate in the said election, while the Second Respondent is the Electoral Commission of Zambia.

4. That on 15th August 2026 the Returning Officer declared the First Respondent duly elected as Member of Parliament for Chongwe East Constituency with 16,058 votes, while I received 6,798 votes, with the remaining votes being attributed to the other candidates and rejected ballots. There is now produced and shown to me marked "STM1" a true copy of Gen 20 Form issued by the Second Respondent.

5. That I verily believe that the election was materially affected by violence, intimidation, threats, bribery, vote buying and other electoral misconduct committed by the First Respondent and/or persons acting with her knowledge, consent and/or approval.

6. That following the UPND adoption process, the First Respondent was not adopted as the Party's parliamentary candidate for Chongwe East Constituency and consequently contested the election as an independent candidate. Thereafter, she commenced a campaign against me. There is now produced and shown to me collectively marked "STM2" true copies of the UPND adoption certificate and the one issued by the First Respondent.

7. That on 29th May 2026, while campaigning, the First Respondent and a member of her campaign team told members of the public that, during my tenure at the Ministry of Health, I was a thief and had stolen containers of medicine. The matter was subsequently reported to the Second Respondent's Conflict Management Committee. There is now produced and shown to me marked "STM3" a true copy of the minutes of the Conflict Management Committee.

8. That despite the proceedings before the Second Respondent's Conflict Management Committee concerning the First Respondent's defamatory remarks against me, on 30th June 2026, a Facebook page connected to the First Respondent and styled "Limited Media Tv ▸ Soli language and its people" published campaign material concerning me stating—

> "*How can we vote for someone who has failed for 25 years.? What is it that, she has forgotten to do in 25 years*?"

9. There is now produced and shown to me marked "STM4" a true copy of the said Facebook publication.

10. That on 8th July 2026, people acting with the First Respondent's knowledge, consent or approval published the following statement on a Facebook page styled "SOLI TV"—

> *"If she managed to hide 61 containers do you think she can manage to develop Chongwe zero development 25 years. Let her go and rest."*

There is now produced and shown to me marked "STM5" a true copy of the said Facebook publication.

11. That further, on 9th July 2026, a Facebook page styled "Limited Media Tv", associated with the First Respondent, published the statement—

> *"Once you continue being against the good things Anita Kamanga has done for the People of Chongwe district... we'll continue preaching about the 61 containers of medicine you stole".*

There is now produced and shown to me marked "STM6" is a true copy of the said Facebook publication.

12. That on 11th July 2026, at approximately 03:00 hours, Mr. Patrick Mudima, a youth chairman in Luwimba Ward and an active supporter of my candidature, was struck by a blue motor vehicle bearing registration number ALE 3458 associated with the First Respondent's campaign and driven by a person identified as Mr. Phiri.

13. That Mr. Mudima sustained injuries to his left leg and right eye, reported the matter to the Zambia Police Service and was issued with a medical report. He further informed me that on 13th July 2026, Mr. Phiri threatened his life. There is now produced and marked to me 'STM7' a true copy of Mr. Mudima's medical report.

14. That I verily believe that the incident and subsequent threat were intended to intimidate Mr. Mudima because of his active support for my candidature and created fear amongst other members of my campaign and the public.

15. That on 17th July 2026, Mr. Bicious Kangungu, a resident of Chongwe East Constituency and supporter of my candidature, witnessed disturbances during a political rally held behind my constituency office.

16. That I am informed by Mr. Kangungu that people he identified as supporters of the First Respondent threw stones at my campaign office and fired approximately three shots into the air, during which he was struck by stones and later reported the matter to the Zambia Police Service. There is now produced and marked to me 'STM8' a true copy of Mr. Kangungu's medical report.

17. That on the same day, Ms. Evelyn Mbalaka who was my campaign manager was attacked by the First Respondent's team and sustained several injuries. She later reported the incident of campaign violence to the Zambia Police Service and was issued with Police-Medical Report Forms. There is now produced and collectively marked to me 'STM9' a true copy Ms. Mbalaka's medical report.

18. That on 23rd July 2026, Mr. Musopelo Tiza, a supporter associated with my campaign, had his foot run over by a motor vehicle belonging to the First Respondent's campaign team to intimidate him. He reported the incident to the Zambia Police Service and was issued with a Police-Medical Report Form. There is now produced and marked to me 'STM10' a true copy of the said medical report.

19. That on the same day, while members of my campaign team were conducting road mobilisation in a Fuso truck in the Bunda Bunda area in Kapete Ward, their vehicle was blocked by a Toyota Prado branded with the First Respondent's images, a black Toyota Harrier and a Fuso truck associated with the First Respondent's campaign.

20. That I am informed by members of my campaign team that the First Respondent was present, alighted from the black Toyota Harrier and handed pepper spray to a person identified as Mr. Oliver, who sprayed members of my campaign team, causing confusion and forcing several of them to flee.

21. That Mr. Sunday Mwanza, who was travelling on the Fuso truck, informed me that persons identified as Gift and Malambo pulled him from the trailer and repeatedly assaulted him, injuring his ears.

22. That Mr. Mwanza further informed me that he was taken to a campaign base at Bwinjinfumu Lodge, questioned about my campaign plans and assaulted with a machete and wooden axe handle before being returned to Kunda Bunda and released, after which he reported the matter to the Police. There is now produced and marked to me 'STM11' a true copy of Mr. Mwanza's medical report.

23. That on the same day, Mr. Leonard Banda was also pulled from the Fuso truck and assaulted with a wooden axe handle but managed to escape after sustaining injuries, while Mr. Aaron Mwambi was pepper sprayed and struck on the arm with a wooden axe handle. There is now produced and marked to me 'STM12' a true copy of Mr. Banda's medical report.

24. That Mr. Mwambi has informed me that he thereafter developed severe chest pain and caused his health to deteriorate, which he attributes to the pepper spray and assault. There is now produced and marked to me 'STM13' a true copy of Mr. Mwambi's medical report.

25. That, similarly, on the same day Ms. Elizabeth Kabwata and Ackim Mambwe were attacked by the First Respondent's team and sustained several injuries. Consequently, they later reported the violent incident to the Zambia Police Service and were issued with Police-Medical Report Forms. There is now produced and collectively marked to me 'STM14' a true copy of Ms. Kabwata and Mr Mambwe's medical reports.

26. That I verily believe that the violence of 23rd July 2026, which occurred during an organised mobilisation exercise, affected several of my supporters at the same time and discouraged voters and campaign volunteers from openly participating in my campaign.

27. That on 28th July 2026, a Facebook page associated with the First Respondent and styled "Chongwe 'youth Advocate'" published the following statement—

> "*The good part is that, we know all the loopholes for imingalato on polling day.*"

There is now produced and shown to me marked "STM15" is a true copy of the said Facebook publication.

28. That on 31st July 2026 the same page published—

> *"In some wards, the polling agents they chose, they're our committee members at that particular polling station...Mmm they have even failed to find polling agents in Chongwe east. Because most of them, they're for Anita Kamanga."*

There is now produced and shown to me marked "STM16" is a true copy of the said Facebook publication.

29. That sometime in July 2026, the First Respondent conducted a rally at Shan'gombo Grounds where I am informed by Ms. Queen Semu, a supporter and member of my mobilisation team, that foodstuffs were distributed and that she personally received a packet of Mana rice.

30. That I verily believe that the said distributions were used to solicit or secure electoral support for the First Respondent.

31. That on 2nd August 2026, Ms. Queen Semu was conducting field mobilisation with other members of my campaign team and members of the public when the First Respondent and her campaign team approached them in a Toyota Prado branded with her images, accompanied by a black Toyota Harrier and a Fuso truck.

32. That Ms. Semu informed me that the First Respondent's team stopped and threw K50.00 notes towards members of my mobilisation team and the public while soliciting electoral support, and that persons present, including Ms. Semu, Mr. Samson Phiri and Mr. Aaron Mwambi, picked or received K50.00, each.

33. That I verily believe that the distribution of money while soliciting electoral support constituted inducement capable of influencing the electoral choice of the recipients.

34. That on 9th August 2026, only a few days before polling, the First Respondent distributed money to persons identified as marketers within Chongwe East Constituency.

35. That I am informed by persons who witnessed the distribution that the recipients were encouraged to support and vote for the First Respondent.

36. That during the same campaign period the First Respondent and/or members of her campaign team also distributed rice to marketers and other persons, which distribution was witnessed by Mr. Goldwin Malanda, a marketer from Kakubo Village.

37. That I verily believe that the distribution of money and foodstuffs during an active campaign, and immediately before polling, influenced the electoral choice of the recipients in favour of the First Respondent.

38. That on 12th August 2026, while Mr. Patrick Mudima was collecting his polling agent's identity card, he was again followed and threatened by Mr. Phiri, resulting in Police intervention and the arrest of Mr. Phiri.

39. That the said incident occurred only a day before polling and, viewed together with the earlier incidents involving Mr. Mudima, was capable of impairing his ability to discharge his polling-agent duties and intimidating other persons performing similar functions on my behalf.

40. That on the same day, the First Respondent and members of her campaign team parked near my constituency office at Chalimbana Turn-Off, close to Corner Bar, where members of my campaign were mobilising voters.

41. That I am informed by Ms. Queen Semu that the First Respondent hooted at the entrance to my campaign office and thereafter gave a bundle of money to Mr. Mushashu Zulu, a chairman associated with my campaign, to solicit votes from him and members of my campaign team.

42. That Mr. Zulu collected the bundle and found a note stating, "If you vote for me, I will give you anything you want." He thereafter distributed the money among persons present, including Ms. Semu and Mr. Samson Phiri, who each received K250.00, while Mr. Sunday Mwanza received K350.00.

43. That I verily believe that the payment of K250.00 and K350.00 to members of my mobilisation team, coupled with the written message accompanying the money, constituted a direct attempt to induce them to vote for the First Respondent.

44. That I am further informed by members of my campaign team and persons within Chongwe East Constituency that throughout the campaign period the First Respondent and/or members of her campaign distributed other items and benefits to members of the public, including mattresses for elderly persons, wheelchairs, school shoes, plates and other items. There is now produced and shown to me marked "STM17" are true copies of pictures and video of the First Respondent distributing gifts.

45. That I verily believe that the cumulative effect of the First Respondent's conduct materially interfered with freedom of electoral choice in Chongwe East Constituency and distorted the conditions under which voters made their electoral choice.

46. That I am advised by my Advocates and verily believe the same to be true that the election and return of the First Respondent is liable to be avoided under section 97 of the Electoral Process Act No. 35 of 2016.

47. That I depose to the facts herein verily believing the same to be true and correct to the best of our knowledge and belief.

SWORN at ---------- by the said)

SYLVIA TEMBO MASEBO)

this ---------- day of ---------- 2026)

DEPONENT'S SIGNATURE

BEFORE ME: ----------

COMMISSIONER FOR OATHS

REPUBLIC OF ZAMBIA
MINISTRY OF JUSTICE
ADMINISTRATOR GENERAL AND OFFICIAL
28 APR 2026
LEGAL OFFICER
COMMISSIONER FOR OATHS
P.O. BOX 37778, LUSAKA

IN THE HIGH COURT FOR ZAMBIA 2026/HP/--------

AT THE PRINCIPAL REGISTRY

HOLDEN AT LUSAKA

(Civil Jurisdiction)

IN THE MATTER OF:	ARTICLE 73 OF THE CONSTITUTION OF ZAMBIA
AND	
IN THE MATTER OF:	SECTIONS 81, 83, 84, 97, 98 & 100 OF THE ELECTORAL PROCESS ACT NO. 35 OF 2016
AND	
IN THE MATTER OF:	REGULATION 15 OF THE ELECTORAL CODE OF CONDUCT, 2016
AND	
IN THE MATTER OF:	THE HIGH COURT (ELECTION PETITION) RULES, 2026, S.I. NO. 31 OF 2026
AND	
IN THE MATTER OF:	THE PARLIAMENTARY ELECTION FOR CHONGWE EAST CONSTITUENCY DECLARED ON 15TH AUGUST 2026

BETWEEN:

SYLVIA TEMBO MASEBO	PETITIONER
AND	
ANITA KAMANGA	FIRST RESPONDENT
ELECTORAL COMMISSION OF ZAMBIA	SECOND RESPONDENT

CERTIFICATE OF EXHIBITS

These are the exhibits referred to in the affidavit of one SLYVIA TEMBO MASEBO produced and exhibited hereto marked "STM1" to "STM17".

Dated at Lusaka this---------- day of ---------- 2026

REPUBLIC OF ZAMBIA
MINISTRY OF JUSTICE
ADMINISTRATOR GENERAL AND OFFICIAL
2026
LEGAL OFFICER
COMMISSIONER FOR OATHS
P.O. BOX 37778, LUSAKA

COMMISSIONER FOR OATHS