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

2026/HP/EP/040

IN THE MATTER OF:	**THE PARLIAMENTARY ELECTION RELATING TO CHONGWE EAST CONSTITUENCY HELD ON 13TH AUGUST, 2026**
AND	
IN THE MATTER OF:	**THE CONSTITUTION OF ZAMBIA, THE CONSTITUTION OF ZAMBIA ACT, CHAPTER 1, VOLUME 1, OF THE LAWS OF ZAMBIA**
AND	
IN THE MATTER OF:	**ARTICLES 1, 2, 5, 8, 9, 45, 46, 47, 48, 49, 50, 54, 70, 71, 72, AND 73 OF THE CONSTITUTION OF ZAMBIA, CONSTITUTION OF ZAMBIA ACT, CHAPTER 1, VOLUME 1, OF THE LAWS OF ZAMBIA**
AND	
IN THE MATTER OF:	**SECTIONS 29, 37, 38, 51, 52, 55, 58, 59, 60, 66, 68, 69, 70, 71, 72, 75, 76, 77, 81, 82, 83, 86, 87 AND 89 OF THE ELECTORAL PROCESS (ELECTORAL CODE OF CONDUCT) ACT NO. 35 OF 2016 OF THE LAWS OF ZAMBIA**
AND	
IN THE MATTER OF:	**SECTION 96, 97, 98, 99, 100, 106, 107, AND 108 OF THE ELECTORAL PROCESS (ELECTORAL CODE OF CONDUCT) ACT NO. 35 OF 2016 OF THE LAWS OF ZAMBIA.**

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

AND
AND IN THE MATTER OF: THE ELECTORAL CODE OF CONDUCT 2016

BETWEEN

GEOFFREY CHUMBWE	**PETITIONER**
AND	
ANITA KAMANGA	**1ST RESPONDENT**
ELECTORAL COMMISSION OF ZAMBIA	**2ND RESPONDENT**

AFFIDAVIT VERIFYING FACTS

I, GEOFFREY CHUMBWE of Plot Number 11744 Kalundu, Opposite Unza, Great East Road Lusaka District of Lusaka Province in the Republic of Zambia do hereby **MAKE OATH** and state as follows:

1. That my full names and residential address are as stated above.
2. That I am a male adult of sound mind and disposition and the Petitioner in this matter and as such competent to depose to this my affidavit.

3. That the facts and matters stated in paragraphs 1 to 8 of the Petition are true to the best of my knowledge and belief.

4. That I was a candidate for Chongwe East Constituency on the sponsorship of the National Reconciliation Party for Unity and Prosperity (NRPUP)in the Parliamentary Election held on the 13th August, 2026 and had a right to be elected to the position of Member of Parliament at the afore mentioned election.

5. That in addition to myself and the 1st Respondent, the following persons were candidates in the said election;

6. Silvia T Mesabo

7. Anita Kamanga

8. Robster Mwanza

9. That on 14th August, 2026 the Returning Officer for the Electoral Commission of Zambia declared that the 1st Respondent had received 16,058 votes and that the said 1st Respondent was duly elected to the office of Member of Parliament for Luapula Constituency.

10. That contrary to the declaration by the Returning Officer that the 1st Respondent was duly elected, the 1st Respondent was not validly elected as the 1st Respondent did not comply with the Provisions of the Constitution and the provisions of the Electoral Process Act No. 35 of the 2016 of the Laws of Zambia and the procedures prescribed under the said Act.

11. The Petitioner will aver that the 1st Respondent and his agents, during the campaign period including between 12th and 15th August 2026, did give money to Twenty (20) NRPUP security team members amounting to K300.00 each totaling to K6,000.

12. The 1st Respondent, acting through her agents, on 13th July 2026 during the election campaign, willfully and unlawfully damaged the Petitioner's branded campaign motor vehicle

13. The 1st Respondent, in collusion with polling staff, engaged in gross electoral malpractice and unprofessional conduct on polling day;

specifically, partisan poll staff unlawfully permitted the 1st Respondent, an independent candidate, to introduce and supply solar lights into the polling station on behalf of the Electoral Commission of Zambia (ECZ), a severe irregularity for which verifiable evidence is available

14. That, now produced and shown to me marked **"GC1"** are true copies of the Petition and Affidavit Verifying Facts I intend to issue.

15. That I am advised by my advocates and verily believe the same to be true that the 1st Respondent was not validly elected in terms of the Constitution of Zambia and the Electoral Process Act as the aforesaid illegal practices committed by the said 1st Respondent or her agents with her knowledge the majority of the voters in the constituency and polling stations were prevented or enticed to avoid electing their preferred candidate or Member of Parliament for the Constituency.

16. That all that I have deposed to herein is true to the best of my knowledge and belief save those based on information the sources of which I have disclosed.

SWORN by the said)
GEOFFREY CHUMBWE)
at Lusaka this.....2.....)
Day of .....Sept.....2026)

DEPONENT

BEFORE ME:.....
COMMISSIONER FOR OATHS

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

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

2026/HP/EP/.....

IN THE MATTER OF: **THE PARLIAMENTARY ELECTION RELATING TO LUAPULA CONSTITUENCY HELD ON 13TH AUGUST, 2026**

AND
IN THE MATTER OF: **THE CONSTITUTION OF ZAMBIA, THE CONSTITUTION OF ZAMBIA ACT, CHAPTER 1, VOLUME 1, OF THE LAWS OF ZAMBIA**

AND
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AND
AND IN THE MATTER OF: THE ELECTORAL CODE OF CONDUCT 2016

BETWEEN

GEOFFREY CHUMBWE **PETITIONER**

AND

ANITA KAMANGA **1ST RESPONDENT**

ELECTORAL COMMISSION OF ZAMBIA **2ND RESPONDENT**

CERTIFICATE OF EXHIBITS

I certify that these are the exhibits referred to in the Affidavit of **GEOFFREY CHUMBWE** now produced and shown to me collectively marked**"GC1"**.

Dated at Lusaka this ....2..... day of .....Sept..... 2026.

BEFORE ME: .....
COMMISSIONER FOR OATHS

REPUBLIC OF ZAMBIA
HIGH COURT OF ZAMBIA
02 SEP 2026
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