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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.**

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**

ELECTION PETITION

THE PETITION OF GEOFFREY CHUMBWE of Plot Number 11744 Kalundu, Opposite Unza, Great East Road Lusaka District of Lusaka Province in the Republic of Zambia **SHOWETH** that:

1. The Petitioner is a person who was a candidate for Chongwe East Constituency on the sponsorship of the National Reconciliation Party for Unity and Prosperity (NRPUP) the Parliamentary Election held on the 13th August,

2026 and he claims to have had a right to be elected to the position of Member of Parliament at the afore mentioned election.

2. In addition to the Petitioner and the 1st Respondent, the following persons were candidates in the said election;
   i. Silvia T Masebo
   ii. Robster Mwanza
3. 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 Chongwe East Constituency.
4. The Petitioner states 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.
5. The Petitioner will aver that the 1st Respondent and her agents, during the campaign period including between 12th and 15th August 2026, did give cash sums of K300 each to Twenty (20) NRPUP security team members amounting total sum of K6,000.
6. 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.
7. 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.

8. The Petitioner contends that the illegal practices committed by the 1st Respondent during the campaign period and on the actual voting day did not promote conditions conducive to the conduct of free and fair elections.

9. Therefore, in the circumstances the Petitioner contends 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.

WHEREFORE Your Petitioner prays that it may be determined and declared that:

I. **The said 1st Respondent was not duly elected and therefore the election of the 1st Respondent as a member of the National Assembly for Chongwe East Parliamentary Constituency is void.**

II. **The illegal practices committed by the 1st Respondent and or her agents materially affected the election result so that the same ought to be nullified.**

III. **An order that the costs occasioned by this Petitioner be borne by the Respondents.**

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

SIGNED BY: _____

PETITIONER

This Petition was drawn by:.....

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The 2nd Respondent
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