

IN THE SUPREME COURT OF SAMOA

HELD AT APIA

IN THE MATTER

of Election Petitions as per Part 14
of the Electoral Act 2019

BETWEEN

TUILOMA TUSA LANISELOTA
LAMEKO, candidate for the Electoral
Constituency of FALEALILI 1

PETITIONER

AND

TOELUPE MAOIAUTELE
POUMULINUKU ONESEMO, elected
candidate for the Electoral
Constituency of FALEALILI 1

RESPONDENT

NOTICE OF RESPONDENT'S RESPONSE TO PETITIONER'S ELECTION PETITION AND COUNTER
PETITION

TAKE NOTICE that the First Respondent, through counsel, will seek Orders:

- (a) Striking out the Petitioner's petition;
- (b) **In the alternative**, dismissing all allegations of bribery and treating against the Respondent as set out in the Petitioner's Petition dated 19 September 2025;
- (c) Declaring that the Petitioner committed acts of bribery and treating as set out in this response contrary to section 94 of the Electoral Act 2019 ("**the Act**"), thus guilty of corrupt practices pursuant to section 94, 96 and 97 of the Act;
- (d) Upon the making of the Order sought under paragraph (c), disqualifying the Petitioner from contesting in any ensuing by-election;
- (e) Finding that the Petitioner made a false declaration dated 19 September 2025 and therefore committed an offence and is liable to the penalties provided under section 23 of the Oaths, Affidavits and Declarations Act 1963 pursuant to section 111 (2) of the Act;

- (f) In the alternative, declaring that the election of the Respondent is not void by reason of the general prevalence of corrupt or illegal practices in Falealili 1 pursuant to section 117 (2) of the Act;
- (g) As to costs, including Court and Solicitor costs, in favour of the Respondent; and
- (h) Or such other relief as the Honourable Court deems just;

ON THE GROUNDS THAT:

(A) GROUNDS FOR STRIKE OUT:

- (a) The Petition is an abuse of the Court's process in that most of the allegations of bribery is in relation to a bribery of a persons who is **NOT** a voter of the Constituency of Falealili 1 as per outlined in the affidavit of Lafailetaua Sio Taua; and
- (b) All allegations of treating are again of treating a person who is **NOT** a voter of the Constituency of Falealili 1; and
- (c) There is insufficient evidence presented in the affidavits to link the allegations of bribery to the Respondent.

(B) RESPONSES TO ALLEGATIONS OF BRIBERY AND TREATING AGAINST THE RESPONDENT:

- a) The Respondent denies all allegations of bribery or treating outlined in the Petition by the Petitioner dated 19 September 2025 to induce a voter to vote or refrain from voting and put the Petitioner to proof thereof.

AND BY WAY OF COUNTER PETITION:

(C) COUNTER ALLEGATIONS OF BRIBERY AGAINST THE PETITIONER

The Respondent further says that the Petitioner committed acts of bribery and treating contrary to the Act, and is thus guilty of corrupt practices pursuant to sections 94 and 96 of the Act:

Particulars

30TH JUNE 2025, SAPUNAOA/ALAFUA

1.	Treating	On or about 30 June 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Tafao Filo Leavasa provided to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter for the Constituency of Falealili 1, transportation to and from the Office of the Electoral Commission for the purpose of carrying out registration for such voters.
2.	Treating	On or about 30 June 2025 at Alafua, the Petitioner Tuiloma Tusa Laniselota Lameko gave food to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter

		for the Constituency of Falealili 1, in order to induce the said voter to vote;
3.	Bribery	or about 30 June 2025 at Alafua, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$10 to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

5TH JULY 2025, SAPUNAOA/ALAFUA

4.	Treating	On or about 5 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Tafao Filo Leavasa provided to Kesimia Tafaoialii (roll number 1309) , a voter for the Constituency of Falealili 1, transportation to and from the TATTE Building for the purpose of carrying out registration for such voters.
5.	Treating	On or about 5 July 2025 at Alafua, the Petitioner Tuiloma Tusa Laniselota Lameko gave food to Kesimia Tafaoialii (roll number 1309) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
6.	Bribery	On or about 5 July 2025 at Alafua, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$10 to Kesimia Tafaoialii (roll number 1309) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

16TH JULY 2025, TAFATAFA

7.	Bribery	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent named Soi Lalovi gave \$35 to Arona Tafafao (roll number 1516) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
8.	Bribery	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$30 to Fiaputa Taamale (roll number 1308) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
9.	Bribery	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$30 to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
10.	Bribery	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$20 to Koli Moemauso (roll number 1242) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
11.	Bribery	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent named Soi Lalovi gave \$30 to Lena Sharon Paulo (roll number 1486) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
12.	Treating	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave food to Lena Sharon Paulo (roll

		number 1486), a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
13.	Bribery	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$30 to Leotele Patea Taamale (roll number 1252) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
14.	Bribery	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent named Soi Lalovi gave \$50 to Tafaomalo Saialala Tafu (roll number 1524) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
15.	Treating	On or about 16 July 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave food to Tafaomalo Saialala Tafu (roll number 1524) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

19TH JULY 2025, SAPUNAOA

16.	Bribery	On or about 19 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$20 to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
17.	Bribery	On or about 19 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$20 to Kesimia Tafaioalii (roll number 1309) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

25TH JULY 2025, SAPUNAOA

18.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu gave \$20 to Elenoa Faaleaga (roll number 1128) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
19.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Tafao Filo Leavasa gave \$20 to Elenoa Faaleaga (roll number 1128) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
20.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Aumua Isaia Lameko gave \$20 to Elenoa Faaleaga (roll number 1128) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
21.	Treating	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu gave food to Elenoa Faaleaga (roll number 1128) , a voter for the Constituency of Falealili

		1, in order to induce the said voter to vote;
22.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu gave \$20 to Faiuga Fiavae Taumate (roll number 1154) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
23.	Treating	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave a plate of food to Faiuga Fiavae Taumate (roll number 1154) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
24.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu gave \$20 to Fiaputa Taamale (roll number 1308) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
25.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Aumua Isaia Lameko gave \$70 to Fiaputa Taamale (roll number 1308) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
26.	Treating	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave food to Fiaputa Taamale (roll number 1308) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
27.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Aumua Isaia Lameko gave \$40 to Kesimia Tafaialii (roll number 1309) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
28.	Treating	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu gave food to Kesimia Tafaialii (roll number 1309) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
29.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Taua Faafua Elekana Tupou gave \$20 to Kesimia Tafaialii (roll number 1309) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
30.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Tafao Filo Leavasa gave \$20 to Kesimia Tafaialii (roll number 1309) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
31.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu gave \$20 to Kesimia Tafaialii (roll number 1309) , a voter for the Constituency of Falealili 1,

		in order to induce the said voter to vote;
32.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Aumua Isaia Lameko gave \$80 to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
33.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu \$20 to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
34.	Treating	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave food to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
35.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Taua Faafua Elekana Tupou gave \$20 to Kirisimasi Mino (roll number 1239) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
36.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$20 to Kirisimasi Mino (roll number 1239) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
37.	Treating	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Taua Faafua Elekana Tupou gave food to Kirisimasi Mino (roll number 1239) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
38.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu gave \$20 to Leotele Patea Taamale (roll number 1252) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
39.	Treating	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave food to Leotele Patea Taamale (roll number 1252) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
40.	Bribery	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave \$20 to Ogeai Aliu (roll number 1093) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
41.	Treating	On or about 25 July 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Faagasea Apisaloma Tafu gave food to Ogeai Aliu (roll number 1093) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

42.	Bribery	On or about 25 July 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave \$20 to Saline Laumata Faalogo Pouvi (roll number 1130) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
43.	Treating	On or about 25 July 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave food to Saline Laumata Faalogo Pouvi (roll number 1130) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

7TH AUGUST 2025, TAFATAFA

44.		On or about 7 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Soi Lalovi gave \$25 to Poulogo Esera (roll number 1408) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
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11TH AUGUST 2025, SAPUNAOA

45.	Bribery	On or about 11 August 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko gave \$20 to Kirisimasi Faalata Taamaletoa (roll number 1127) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
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15th AUGUST 2025, TAFATAFA

46.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave \$50 to Edwin Faatili (roll number 186) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
47.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave food to Edwin Faatili (roll number 186) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
48.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Tapa Faauuga gave \$100 to Feleti Nai (roll number 251) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
49.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave food to Feleti Nai (roll number 251) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
50.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota

		Lameko and/or his representative or agent Talanoa Tia gave \$30 to Galusinafelisi Fiti (roll number 196) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
51.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent Talanoa Tia gave food to Galusinafelisi Fiti (roll number 196) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
52.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave \$30 to Ioane Fuivelo (roll number 209) , a voter for the Constituency of Falealili 1, in order to induce the said voter to
53.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko and/or his representative or agent gave food to Ioane Fuivelo (roll number 209) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
54.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent Soi Lalovi gave \$30 to Mouga Manu (roll number 235) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
55.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave food to Mouga Manu (roll number 235) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
56.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent named Soi Lalovi gave \$60 to Ofisa Roberts (roll number 1846) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
57.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave food to Ofisa Roberts (roll number 1846) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
58.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave \$30 to Salvation Edwin (roll number 178) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
59.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave food to Salvation Edwin (roll number 178) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
60.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota

		Lameko, and/or his representative or agent gave \$30 to Savali Taunuu (roll number 307) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
61.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave food to Savali Taunuu (roll number 307) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
62.	Bribery	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave \$30 to Timo Winterstein (roll number 343) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
63.	Treating	On or about 15 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, and/or his representative or agent gave food to Timo Winterstein (roll number 343) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

28TH AUGUST 2025, MALAEMALU

64.	Bribery	On or about 28 August 2025 at Malaemalu, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly by his agent/committee member Soi Lalovi gave \$20 to Poulogo Esera (roll number 1408) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
65.	Bribery	On or about 28 August 2025 at Malaemalu, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Meleane losia gave \$30 to Heni Malu (roll number 60) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
66.	Bribery	On or about 28 August 2025 at Malaemalu, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Meleane losia gave \$40 to Sosefina Elama (roll number 15) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
67.	Bribery	On or about 28 August 2025 at Falealili 1, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Meleane losia gave \$30 to Vaiola Malu (roll number 62) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

28TH AUGUST 2025, MATAUTU FALEALILI

68.	Bribery	On or about 28 August 2025 at Matautu Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly by his agent/committee member named Tepatuanai Faauuga Fuafiva gave \$50 to Elisapeta Sepule Kiso (roll number 287) in order to induce the said voter to vote;
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69.	Bribery	On or about 28 August 2025 at Matautu Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Tepatuanai Faauga Fuafiva gave \$50 to Ioane Fuivelo (roll number 209) a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
70.	Bribery	On or about 28 August 2025 at Matautu Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Tepatuanai Faauga Fuafiva gave \$50 to Timo Winterstein (roll number 343) a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
71.	Bribery	On or about 28 August 2025 at Matautu Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Tepatuanai Faauga Fuafiva gave \$50 to Tusa Fatu Timo (roll number 154) a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
72.	Bribery	On or about 28 August 2025 at Matautu Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Tepatuanai Faauga Fuafiva gave \$50 to Ulima Simiti (roll number 296) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
73.	Bribery	On or about 28 August 2025 at Matautu Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Tepatuanai Faauga Fuafiva gave \$20 to Vavae Fuialo (roll number 205) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

28th AUGUST 2025, SAPUNAOA

74.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Tuiloma Levi Lautusi (roll number 1073) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
75.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Iusitini Esau Taituuga (roll number 1123) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
76.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Elekana Faitala (roll number 1142) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
77.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Junior Faitala (roll number 1143) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
78.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana

		Tupou gave \$20 to Joshua Faitala Enoka (roll number 1145) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
79.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Kitiona Fiamate (roll number 1156) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
80.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Asini Mino Lalau (roll number 1240) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
81.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Iulai Mila Tuiavii (roll number 1247) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
82.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Tauinaola Pologa (roll number 1267) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
83.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Niulala Poneta (roll number 1268) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
84.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Vito Sefo (roll number 1289) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
85.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Avia Sione (roll number 1298) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
86.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Tutu Talia Fili (roll number 1317) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
87.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana Tupou gave \$20 to Oliva Tito Filiga (roll number 1331) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
88.	Bribery	On or about 28 August 2025 at Sapunaoa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taua Faafua Elekana

		Tupou gave \$20 to Lautusi Tuiloma (roll number 1337) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
89.	Bribery	On or about 28 August 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly through his representative or agent Faagasea Apisaloma Tafu gave \$100 to Alafou Vaitoelau (roll number 1366) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
90.	Bribery	On or about 28 August 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly through his representative or agent Faagasea Apisaloma Tafu gave \$50 to Lalotoa Mataafa (roll number 353) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
91.	Bribery	On or about 28 August 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly through his representative or agent Faagasea Apisaloma Tafu gave \$60 to Peniata Feuu , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
92.	Bribery	On or about 28 August 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly through his representative or agent Faagasea Apisaloma Tafu gave \$50 to Sia Molia (roll number 354) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
93.	Bribery	On or about 28 August 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly through his representative or agent Faagasea Apisaloma Tafu gave \$50 to Suaniumata Vaitoelau , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
94.	Bribery	On or about 28 August 2025 at Sapuanoa, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly through his representative or agent Faagasea Apisaloma Tafu gave \$30 to Faiuga Fiavae Taumate (roll number 1154) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

28TH AUGUST 2025, SATALO

95.	Bribery	On or about 28 August 2025 at Satalo, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Soi Lalovi gave \$20 to Arona Tafafao (roll number 1516) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
96.	Bribery	On or about 28 August 2025 at Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko indirectly through his representative or agent Soi Lalovi gave \$20 to Lalelei Soi (roll number 1509) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;

28TH AUGUST 2025, TAFATAFA

97.	Bribery	On or about 28 August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Soi Lalovi gave \$20 to Lena Sharon Paulo (roll number 1486) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
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28TH AUGUST 2025, VAOVAI FALEALILI

98.	Bribery	On or about 28 August 2025 at Vaovai Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Matua Bob gave \$60 to Pula Roberts (roll number 1847) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
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28TH – 29TH AUGUST 2025, TAFATAFA

99.	Bribery	On or about 28 th to the 29 th August 2025 at Tafatafa, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Soi Lalovi gave \$20 to Tafaomalo Saialala Tafu (roll number 1524) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
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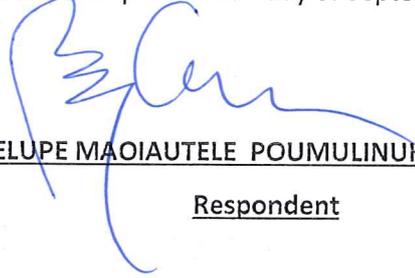
29TH AUGUST 2025, MALAEMALU

100	Bribery	On or about 29 August 2025 at Malaemalu, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Vaiuta Lolesio gave \$30 to Sarai Itutolu Leilua (roll number 45) , a voter for the Constituency of Falealili 1, in order to induce the said voter to vote;
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29TH AUGUST 2025, SATALO

101	Treating	On or about 29 August 2025 at Satalo Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taveuveu Aso provided transportation to and from a polling booth to Tafaomalo Saialala Tafu (roll number 1524) , a voter for the Constituency of Falealili 1, for the purpose of that voter casting his/her vote.
102	Treating	On or about 29 August 2025 at Satalo Falealili, the Petitioner Tuiloma Tusa Laniselota Lameko, indirectly by his agent/committee member named Taveuveu Aso provided transportation to and from a polling booth to Lena Sharon Paulo (roll number 1486) , a voter for the Constituency of Falealili 1, for the purpose of that voter casting his/her vote.

Dated at Apia this 30th day of September 2025



(TOELUPE MAOIAUTELE POUMULINUKU ONESEMO)

Respondent

This Counter Petition is filed by Precious Chang of Lui and Chang, Solicitor whose address for service is at the Offices of Lui & Chang, McDonald Building, Savalalo, Apia.

IN THE SUPREME COURT OF SAMOA
HELD AT APIA

IN THE MATTER

of Election Petitions as per Part 14
of the Electoral Act 2019

BETWEEN

TUILOMA TUSA LANISELOTA

LAMEKO, candidate for the Electoral
Constituency of FALEALILI 1

PETITIONER

AND

TOELUPE MAOIAUTELE

POUMULINUKU ONESEMO, elected
candidate for the Electoral
Constituency of FALEALILI 1

RESPONDENT

NOTICE OF RESPONDENT'S RESPONSE TO ELECTION
PETITION AND COUNTER PETITION

LUI & CHANG
Solicitors
Malifa, Apia

