

Promo-LEX

Advancing democracy and human rights

OBSERVATION MISSION

GENERAL LOCAL ELECTIONS
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Promo-LEX
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EXECUTIVE SUMMARY

Political Context. In the general local elections, 898 mayors and 11,058 local councillors were to be elected (522 less than in the previous elections). 60 parties were entitled to participate in these elections, of which 37 nominated candidates.

The pre-election period was marked by the declaration, for the first time in the history of the Republic of Moldova, of the *unconstitutionality of a political party*. However, its leader continued to get involved in the electoral campaign through other parties or independent candidates.

The political party switching of mayors was a process that also characterized this pre-election period. On the eve of the local elections, approximately 39% of mayors switched their political allegiance. Most of them (36%) “migrated” to PAS.

Another significant element shaping the socio-political landscape was the regional geopolitical instability triggered by the Russian Federation’s aggression against Ukraine. This development was particularly pertinent as the Republic of Moldova, alongside Ukraine, had recently been granted candidate status for European Union membership.

Legal Framework. The general local elections marked the first to be conducted under the provisions of the New Electoral Code, adopted on 8 December 2022 and effective from January 2023. When approving the new electoral legislation, 73% of the recommendations made by the Promo-LEX Election Observation Mission (EOM) in the previous general local elections were considered. The normative framework of the Central Electoral Commission (CEC) was adjusted to the provisions of the Electoral Code with some delay.

However, the electoral campaign’s legal framework and conduct were marked by several amendments to the Electoral Code made during the electoral period, which adversely affected the electoral process’s correctness and the right to vote and to stand for election. Also, the Promo-LEX EOM opines that holding elections during the state of emergency permitted the Commission for Emergency Situations (CES) to intervene in ways that breached the principle of legal certainty in the organization and execution of the elections.

The local elections in 2023 demonstrated that there are still legal issues that need to be resolved. In this context, we highlight several concerns, though this list is not exhaustive: uncertainties regarding the application of the restriction on the right to be elected for persons deprived of the right to occupy positions of responsibility; the conduct of elections in a state of emergency and the intervention of the CES; the support of the electoral competitors by subjects other than those who appointed them, etc.

Electoral Bodies. Local elections are more complex in terms of organizing and conducting the electoral process, partly due to the involvement of multiple levels of electoral bodies. The Central Electoral Commission generally managed its responsibilities effectively, despite the increased demands imposed by the new electoral legislation. A challenge in this regard was to carry out the certification procedure for new electoral officials. EOM PromOLEX recommends that the CEC and the Centre for Continuous Electoral Training (CICDE) strengthen the training component for electoral officials and ensure their early training in the context of future elections.

However, due to the specificity of local elections, the responsibility and the largest workload fell on the lower electoral bodies, especially the first-level District Electoral Councils (DEC I). Thus, the large volume of work assigned to them, which in some places seems to have exceeded their capacities, created difficulties in managing the electoral process. The shortage of human resources, a challenge impacting the CEC at the national level and even more so the lower electoral bodies, could be more effectively addressed through the enhancement of administrative-territorial reform and the strengthening of the capacities of local public authorities.

All lower electoral bodies for local elections (first- and second-level District Electoral Councils, Precinct Electoral Bureaus (PEBs), with the exception of DEC Bender, were set up within legal deadlines. They generally adhered to the established work schedule. PromOLEX EOM considers that the appointment of permanent chairpersons for the second-level District Electoral Councils (DEC II) increased the professionalization of these bodies. However, this move has also drawn criticism from certain competitors concerning their perceived dependence on the CEC.

Permanent changes in their composition remain a problem in the electoral process. The structure of electoral bodies tends to be gender imbalanced, particularly in the PEBs, where about 92% of the workforce were women. Only about 1/3 of PEBs were qualified by PromOLEX EOM as accessible to people with special needs.

Electoral Complaints. The volume of complaints (including requests, petitions, and notifications) submitted to the CEC and the DECSs in the 2023 general local elections was approximately three times higher than the number of complaints filed during the 2019 elections. The significant rise in complaints was attributed to several factors: the increased number of competitors, amendments to the electoral legislation regarding the admissibility of complaints, the material competence to solve them, along with the specificity of the electoral campaign (e.g., cases of cancellation of registration). The publication of complaints was sporadic and incomplete, with the criteria for publication lacking clarity.

The most contested were both the actions of the candidates, as well as those of the electoral bodies. In contrast to previous elections, representatives of law enforcement bodies appeared as active participants, notifying electoral bodies of issues.

The complaints submitted to the CEC primarily addressed issues such as the nomination/registration of electoral competitors, the misuse of administrative resources, the verification of the legality of elections, and the conduct of electoral campaigning. Unlike other elections, the confirmation/denial of the legality of elections and the validation/invalidation of mandates has become one of the most common topics.

Nomination and Registration of Candidates. The new electoral legislation facilitated the registration of independent candidates by reducing the required number of signatures, yet maintained the obligation for candidates to collect these signatures. Additionally, the minimum age requirement to run for mayor was reduced from 25 to 23, and a mandatory general education requirement was introduced.

The clarity and predictability of the registration procedures was affected by the uncertainties related to the possibility of running for the local elected officials of the Shor Party, which was declared unconstitutional. The electoral process was also marked by the intervention of the Commission for Emergency Situations which cancelled the registration of the electoral competitors nominated by the “CHANCE” Political Party. However, we consider that the elections were competitive, with 35 parties and an electoral bloc participating in them, of which 23 obtained at least one mayor mandate: PAS (291), PSRM (145), PSDE (103), etc. A total of 116 (13%) mayoral positions were filled by independent candidates, representing a higher percentage than that of the last local elections in 2019.

The candidate lists were amended frequently, with at least 346 modifications recorded. At the same time, individuals included on the lists contested the absence of a provision allowing them to request their removal from the lists. Some competitors raised concerns about meeting the gender quota requirements during the formation of their lists.

Electoral Lists and State Register of Voters. The CEC continued to ensure the transparency of data from the State Register of Voters (SRV) by publishing monthly updates on the number of registered voters. Contrary to the trends in recent years of a steady decline in the number of voters in the SRV, there was an increase in the total number of voters ahead of the general local elections. However, with regard to voters assigned to a particular constituency, their number decreased, compared to 2019, by more than 56 thousand.

According to the observers, only 80% of the visited PEBs received the electoral lists in due time. The legislative changes aimed at sending the lists to PEBs in two shifts have increased their quality. Nonetheless, identified issues include address inaccuracies, incorrect allocation of voters to polling stations, the inclusion of deceased individuals in the lists, among others. Promo-LEX EOM did not identify any infringement on voters’ rights through the implementation of a restriction preventing changes to domicile/residence within three months prior to Election Day.

We draw attention to a chronic issue regarding the exclusion from the lists of a part of the *de facto* residents of Corjova commune. The situation is perpetuated from election to election, yet no systemic solutions have been proposed by either the electoral or other public authorities. In Promo-LEX’s opinion, solving the problem through dialogue between citizens and public authorities is urgently necessary.

Public Administration. The local Public Administration was involved in organizing the elections by executing the responsibilities delineated in the electoral legislation: appointing the CECE and PEBs members; supplying lower electoral bodies with necessary facilities and materials for their operations; providing designated areas for electoral displays and voter meetings; and participating in the verification of the State Register of Voters. Compared to previous elections, there was a noticeable increase (approximately 96%) in the incidence of LPAs timely approving decisions regarding electoral displays and locations for meetings with voters. The publication of decisions also saw improvement, with about 89% being displayed effectively.

Regarding the involvement of the central public authorities, the Promo-LEX EOM found a rather active involvement of the law enforcement bodies, especially the Information and Security Service (SIS) in the supervision of compliance with the legislation during the electoral campaign.

Electoral Competitors. Electoral competitors demonstrated an increased activism in the electoral campaign. At the same time, cases occurred where candidates were *de facto* nominated prior to the legally stipulated deadline, along with instances of political promotion with electoral undertones before the commencement of the campaign period.

The most common campaign activities included distributing electoral materials and holding meetings with voters. Regarding advertising methods, there was a noticeable rise in sponsored content on social media, highlighting its growing importance as a tool for electoral promotion.

Among the most serious violations in the campaign, according to Promo-LEX, are the misuse of administrative resources and illegal financing. Promo-LEX EOM reported 185 instances of administrative resource utilization, notably including the engagement of people holding public positions in campaign activities (61 cases), organizing electoral meetings within public institutions with their employees during their work hours (56 cases), and electoral candidates claiming credit for public works/services financed with public funds (41 cases).

Although the electoral legislation and related laws have been strengthened since the last general local elections, there has not been a significant reduction in the number of reported violations. Promo-LEX observers identified at least 8 cases that could be categorized as the distribution of gifts with electoral implications. At the same time, according to the security and law enforcement bodies, there was also a case of systemic electoral corruption involving both candidates and voters, leading to the cancellation of registrations for candidates nominated by the Socialist Party across all electoral constituencies.

Observing Electoral Campaign Finance. The new electoral legislation strengthened the CEC'S role in overseeing and controlling electoral campaign financing. Despite the new Electoral Code appearing to simplify the process of opening the "Electoral Fund" account, similar to past elections, numerous political parties reported facing refusals from commercial banks to open these accounts.

Delayed approval of the relevant regulatory framework apparently created difficulties for competitors in completing and submitting reports. However, Promo-LEX EOM found a relatively high degree of presentation of financial reports from competitors to the CEC. At the same time, electoral competitors' submission of reports to DEC remains incomplete, yet better than in the previous local elections. Among the 36 political parties that nominated candidates, at least one report on electoral campaign financing was submitted by 32 political parties, and 27 submitted the weekly financial reports/related information, including the final report. If initially the CEC did not manage to publish the reports within the legal deadlines, the process improved over time. According to the reports, the main sources of financing were revenues accumulated from individuals (donations), accounting for 51%, and own funds from the accounts of political parties, representing 34%.

As a result of civic monitoring, Promo-LEX EOM estimated that there were unreported expenses amounting to at least 4,743,455 Moldovan Lei. In the case of political parties, most unreported expenses were estimated for the Șansa Party (38%), followed by PSRM (16%) and PR (12%). Based on their purpose, the majority of these expenses were for labor remuneration (23%), followed by expenses for promotional materials (22%) and payments to volunteers/activists (21%).

Hate Speech. The use of hate speech in general local elections remains at the same level (102 cases in 2022 and 101 cases in 2019), but it is much lower than in parliamentary (299 cases) and presidential elections (448 cases). Social media (54 cases) and mass media (34 cases) continue to be the predominant sources for the spread of hate speech.

Next, hate speech is predominantly used by men (89 cases), aged between 35 and 50 (72 cases). The most common criteria underlying hate speech were "political affiliation" (69 cases), "sex/gender" (37 cases), "health" (27 cases), "professional activity" (11 cases) and "sexual orientation"/"gender identity" (11 cases). Of the total number of authors of hate

speech, 53% were electoral competitors and politicians. LGBTQI people are still the target of the most aggressive forms of hate speech. Civil status, gender roles, physical appearance, etc., were the basis of sexist discourses directed especially against women.

The reaction of public authorities to hate speech during electoral periods records positive dynamics compared to the 2019–2021 period.

Election Day. Polling stations were opened for voters in due time. However, not all established procedures were consistently followed. For example, the new requirement of upholding solemnity by playing the national anthem was ignored by about 27% of polling stations. Accessibility of Polling Stations (PS) for voters with mobility impairments continues to be a challenge. The supply of heating at Polling Stations (PS), especially those located outside the municipality of Chisinau, was inadequate. Chişinău. The polling stations closed in accordance with regulations. Promo-LEX EOM repeatedly signals non-compliance among some PEBs with the regulatory requirements for the vote-counting process, specifically the rule that ballots should be presented for counting by a single member.

Throughout the two voting rounds, 854 incidents were reported, with the majority (726) occurring in the first round. Compared to the 2019 local elections (563 incidents), there has been an increase. Promo-LEX highlights that in at least 13 cases, the mission's observers were restricted in their ability to freely observe. Quantitatively, the most frequently reported incidents were: violations of voting secrecy (150 cases), unjustified group voting (133), inaccuracies in the electoral lists (93), the unjustified presence of unauthorized individuals within 100 meters of the polling station (86), and interruptions in the filming process during the day (83).

The results of the parallel counting performed by EOM Promo-LEX for the positions of mayor of the municipality of Chisinau and Balti confirm, in principle, the results announced by the CEC.

Post-Election Period. In most constituencies, the confirmation of the legality of the elections and the validation of the mandates was carried out according to the provisions of the legal framework, the electoral councils facing the new attributions established by the Electoral Code. Simultaneously, EOM Promo-LEX identified at least four cases where competitors claimed that electoral bodies confirmed the legality of the elections before the final resolution of disputes. In addition, in some electoral districts (UTAG, at least), the confirmation of the legality of the elections and the validation of the mandates took place including on November 5, 2023.

One of the problems identified is the lack of a centralized mechanism for verifying the lack or existence of electoral complaints to hierarchically superior bodies and courts. Also, unlike the previous procedure for confirming the legality of elections in the courts, the current procedure does not always have the formality and publicity of the hearing, as well as may affect the equality of the parties.

INTRODUCTION

The Observation Mission of the general local elections of November 5 (19), 2023 is a project carried out by Promo-LEX Association within the Civic Coalition for Free and Fair Elections. Promo-LEX Association is a public association that aims to develop democracy in the Republic of Moldova, including the Transnistrian region, by promoting and defending human rights, monitoring democratic processes and strengthening civil society.

The observation of the electoral process throughout the electoral period was conducted by 40 long-term observers (LTOs). Promo-LEX EOM also monitored hate speech and discrimination through seven monitors.

On the day of the first round, Promo-LEX EOM deployed static short-term observers (STOs) in 602 polling stations, achieving 100% coverage of polling stations in the Balti and Chisinau municipalities. Additionally, on Election Day, 71 mobile teams, each comprising two observers, were operational, monitoring approximately 765 polling stations. Thus, Promo-LEX observers monitored the electoral procedures in 1,367 polling stations (PS), which represents 69% of the total 1,958 established.

For the second round of voting, Promo-LEX EOM assigned by a STO to 175 polling stations out of the 620 polling stations opened (609 for the second round, and 11 sections for repeated voting). The other 445 polling stations were observed by 50 mobile teams (two observers each).

All observers participating in the monitoring process received training in workshops organized by the Promo-LEX Mission and signed the Code of Conduct for Promo-LEX's independent national observers, committing to act promptly, in good faith, and in a non-partisan manner. The activity of all observers was coordinated by the central team of the Mission. The LTO findings were reported based on thematic forms and are stored on the web platform www.data.promolex.md, a secure system with limited access, managed by Promo-LEX. Through field visits, Promo-LEX observers collected and analyzed information resulting from on-site observations, interviews, meetings with interlocutors and consulted official documents. The activity of electoral candidates/competitors was also monitored online.

Promo-LEX EOM is not a political opponent of the competitors participating in the electoral process, nor is it an investigative authority, and it does not take on the explicit responsibility to verify or prove the observations made. However, the observers' reports are, whenever possible, supported by photographic and video evidence, which can only be made available

to law enforcement bodies on the basis of appropriate requests, and in no case available to electoral competitors. At the same time, the violations, including those alleged, found in this report, must be treated by the electoral authorities as formal notifications and are to be examined according to their competence, in the light of the provisions of Article 88 para. (9) of the Electoral Code. The Promo-LEX mission operates the web platform www.electorala.monitor.md, where anyone can report electoral activities.

The Promo-LEX Association has been organizing election observation missions in the Republic of Moldova since 2009, marking its 25th mission presence. Employees and members of the Association also have extensive international experience, participating in election observation at International Missions in Armenia, Czech Republic, Germany, Georgia, Estonia, Montenegro, Norway, Romania, Serbia, Sweden, Turkey, Ukraine, etc.

The international standards referred to in this report are those developed by the UN, the OSCE, the European Commission for Democracy through Law (Venice Commission), the European Union and the Council of Europe. At the end of the report, recommendations are formulated for public authorities, electoral bodies, electoral competitors, other stakeholders, in order to ensure the proper organization and improvement of electoral procedures.

This report is prepared with the financial support of the United States Agency for International Development (USAID) through the *“Democracy, Transparency and Accountability”* Program and the European Union through the Project *“Strengthening the Electoral Legislative Framework and Evaluating its Implementation during the 2023 General Local Elections”*.

CHAPTER I

POLITICAL CONTEXT

The local general elections of 5 (19) November 2023 were the eighth election of this type held in the Republic of Moldova and the fourth observed by the Promo-LEX Association. It is about the election of 898 mayors and 11,058 local councillors, including 9,972 for villages (communes) and towns, and 1,086 for district/municipal councils¹.

The socio-political context of the general local elections has been shaped by several phenomena. Thus, at national level (parliamentary majority, Presidency) political power is held by the candidates of a single political party – the Action and Solidarity Party (PAS). From this perspective, the general local elections represented a test of the level of support for the governing party.

The Party System in the Republic of Moldova is pluralistic. For the general local elections, 60 political parties registered for the PSA were entitled to nominate candidates, 16 more parties than in the last general local elections of 2019. The number of competitors who nominated candidates increased from 28 in 2019 to 37 in 2023 (35 parties and an electoral bloc consisting of two parties). The number of independent candidates remained virtually unchanged compared to 2019.

Shortly before the beginning of the electoral period, for the first time in the history of the Republic of Moldova, the Constitutional Court declared a political party unconstitutional, on the grounds of “non-transparent and illegal financing of its activity”². Even if the party was removed, its leader – Ilan Shor – remained active in the election process either by reviving other parties just before the elections, or by supporting independent candidates.

*The phenomenon of “political migration” among mayors, observed during the recent local elections,*³ once again highlighted its impact on the socio-political landscape of the electoral process. Evaluating the shifts in political affiliation⁴ among mayors elected in 2019, the Promo-LEX Association observed that approximately 39% of them altered their political stance or declared themselves as independent/unaffiliated prior to the 2023 local elections. Most of them (36%) “migrated” to PAS.

1 In the current elections, no mayors and local councils were elected in the village electoral districts of Chioselia Rusă and Cotovscoe (ATUG). New local elections have also been established for a new composition of the Cairaclia (Taraclia) Village Council.

2 Constitutional Court [Decision](#) No 10 of 19 June 2023 on the Constitutionality Review of the Political Party “Shor”.

3 [Report No. 3](#), Promo-LEX EOM of the General Local Elections of 5 November 2023, p. 16.

4 The calculation was made based on the information on the political affiliation of mayors from about 785 settlements, obtained by observers during visits to the territory.

Security issues in the region affected the organization and conduct of elections. The war initiated by the Russian Federation against Ukraine, alongside the hybrid warfare conducted by the Russian Federation in the Republic of Moldova, has resulted in the declaration and ongoing extension of a state of emergency⁵. Although, according to the Parliament's decision, the state of emergency was not to affect the organization and conduct of elections on the territory of the Republic of Moldova⁶, through its provisions, the Commission for Emergency Situations (CES) intervened at least three times in the electoral process⁷.

On June 23, 2022, the Republic of Moldova was granted *candidate country status for European Union accession*. In preparation for the commencement of accession negotiations, Moldova pledged to fulfill 9 commitments, among them *electoral reform* (Commitment No. 2). It's noteworthy that efforts to draft a new Electoral Code started in autumn 2021, with its proposal already in place upon receiving candidate status. The new Electoral Code was adopted on December 8, 2022, and became effective on January 1, 2023. This initiative was acknowledged and highlighted⁸ by the European Commission's rapporteur a year after Moldova achieved candidate country status.

On March 15, 2023, the Government of the Republic of Moldova approved *the Public Administration Reform Strategy for the years 2023–2030*⁹. This includes a number of measures with potential impact on the administrative-territorial organization. Accordingly, the attempts to promote the voluntary amalgamation of first-level Administrative-Territorial Units (ATUs)¹⁰ on the eve of the general local elections, in addition to the remaining uncertainties regarding the future of the second administrative level, caused a state of uncertainty among local elected officials¹¹.

5 [Decision](#) of the Parliament of the Republic of Moldova No. 41 of 24 February 2022 on the Declaration of a State of Emergency.

6 [Decision](#) of the Parliament of the Republic of Moldova No 244 of 31 July 2023 on the Extension of the State of Emergency.

7 [Report No. 2](#), of Promo-LEX EOM of the General Local Elections of 5 November 2023, p 8.; [Report No. 4](#), Promo-LEX EOM of the General Local Elections of 5 November 2023, p 6.; [Report No. 5](#), Promo-LEX EOM of the General Local Elections of 5 November 2023, p. 6.

8 [Press remarks](#) by Neighbourhood and Enlargement Commissioner Olivér Várhelyi, following the informal General Affairs Council.

9 Public Administration [Reform Strategy](#) for 2023–2030, approved by Executive.

10 [Law No 225](#) of 31.07.2023 on Voluntary Amalgamation of Administrative-Territorial Units.

11 [Press release](#): On the eve of the elections, Viorel Furdui talks about cooperation with the government and strategic mistakes in local public administration!

CHAPTER II

LEGAL FRAMEWORK

2.1. Implementation of the recommendations formulated by Promo-LEX EOM in the Final Observation Report of the General Local Elections of October 20 (November 3), 2019

Following the approval of the new Electoral Code and the amendment of the related legislation, to which the Promo-LEX Association also contributed¹², 11 recommendations (73%) out of the 17 formulated by the Promo-LEX EOM at the previous general local elections were fully or partially implemented. Among the recommendations not accepted and, therefore, not implemented in the context of the November 5, 2023, local elections, we highlight the proposal to introduce the requirement for all categories of potential electoral competitors in local elections to collect signatures in support of their candidacy. We remind that political parties are not obliged to collect signatures for the nomination of candidates. In this context, the Venice Commission, in its opinion on the Electoral Code, stated that “to ensure equal opportunities for participation, it could be considered appropriate for all parties, electoral blocs, and independent candidates, who are not represented in the body to be elected or in a higher body, to demonstrate the minimum required support under the same or similar conditions”¹³.

2.2. The amendments to the legal framework during the ongoing electoral process

On July 31, 2023, the Parliament of the Republic of Moldova passed Law No. 220 to amend various legislative acts (implementing certain considerations of the Constitutional Court Decision No. 10/2023 on the constitutionality check of the “Shor” Political Party)¹⁴, which was published in the Official Gazette and came into force on August 18, 2023.¹⁵ By this law, in addition to the amendments aimed at preventing the use of electoral symbols that are identical or similar to those of parties declared unconstitutional, granting the authority to electoral bodies to detect voter corruption and ensuring special voting rights for students, another restriction of the right to be elected was introduced (art. 16, para. (2), letter (e)).

By Decision of 3 October 2023, the Constitutional Court declared art. 16, para (2), letter (e) of the Unconstitutional Electoral Code. Correspondingly, the subjects to whom the

12 For details, see [Report No. 1](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 11-14.

13 [Joint opinion](#) (Venice Commission and OSCE/ODIHR) on the draft Electoral Code. Adopted by the Venice Commission at its 132nd plenary session (Venice, 21-22 October 2022), item 66.

14 [Law](#) No. 220 of 31.07.2023 on the amendment of some normative acts (implementation of some considerations of the Constitutional Court Decision no. 10/2023 on the constitutionality control of the Political Party “Shor”).

15 For details, see [Report No. 1](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 16-17.

restriction set out in this rule was applicable regained the right to be elected only 3 days before the start of the electoral campaign.

On the morning of the following day (October 4, 2023), the Commission for Exceptional Situations issued Order No. 86, which, by derogation from the provisions of the Electoral Code, decided that certain categories of people, whose actions led to the declaration of unconstitutionality of the political party or were targeted in the decision of the Constitutional Court, will not be able to participate in the general local elections of November 5, 2023. The order took effect from the moment of issuance, being mandatory and enforceable. Similarly, on October 4, 2023, the Parliament of the Republic of Moldova introduced into legislative procedure and adopted, under emergency procedure, Law No. 280 on amending the Electoral Code¹⁶. Through this draft, restrictions of the right to be elected were introduced in art. 16, para. (2), letter f), similar in content to those established by the CES Provision.

All the laws amending the Electoral Code mentioned above were published and entered into force during the electoral period. As a result, both the CEC and the lower electoral bodies were placed in the situation not only to omit adhering to the principles of decisional transparency and public consultation for adjusting the regulations in accordance with the new amendments, but also to modify their decisions regarding the registration/non-registration of electoral competitors.

In the opinion of the Promo-LEX EOM, the approval of the amendments to the legal framework existing during the electoral period had a negative impact on the correctness of the electoral process, but also on the rights to elect and be elected. Also, all these factors and circumstances have created uncertainties for voters, electoral bodies and electoral competitors, and the transparency and predictability of the electoral process have been affected. We remind that, according to the Code of Good Practice in Electoral Matters¹⁷, the stability of the electoral legislation is one of the fundamental conditions of a democratic state based on the rule of law, being at the same time an important element of the credibility of the electoral process.

2.3. Synthesis of Legal Issues During the Electoral Period

During the electoral campaign, Promo-LEX EMO identified, in addition to previously noted issues, several new problems or uncertainties that require resolution before future elections. These include:

- **Uncertainties regarding the application of the restriction on the right to be elected, provided by art. 16, para. (2), letter d)¹⁸ – specifically regarding individuals who have been barred from holding public office by a final court decision, a sanction made known to electoral bodies by the Ministry of Justice, the National Integrity Authority (ANI), and/or the Ministry of Interior Affairs.** A state of uncertainty was observed on the part of the authorities regarding about 20 individuals prohibited from holding elective office based on a final finding by ANI, yet their mandates had not been revoked. Following consultations with the Parliamentary Committee on Legal Affairs, Appointments, and Immunities, ANI removed these individuals from the list of those banned from holding elective office. Promo-LEX EOM believes that restrictions on the right to be elected should be interpreted in line with the overall spirit of the Electoral Code. Considering the legislation sets forth multiple stipulations against the candidacy of individuals who have been stripped of the right to hold public office and are the subject of final ANI findings, it is evident that such individuals should not be allowed to participate in elections. the exclusion from the electoral race should not vary based on the office held by the person at the time of the personal assets and interests regime violation (e.g., mayor) versus the office they are contesting (e.g., local councillor).

¹⁶ [Law No. 280 of 04.10.2023 on Amending the Electoral Code No. 325/2022.](#)

¹⁷ [Code of Good Practice in Electoral Matters.](#)

¹⁸ [Report No. 3.](#) Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 8-9.

The prohibition on being elected is general, as per Art. 16, para (2), letter (d). Consequently, with the validation of the new mayoral mandate following the 5 November 2023 elections, the previous mayoral mandate (2019-2023) ends, and the disqualification from holding any public office (as stipulated in Art. 23, para. (2), letter (d) and para. (6) of Law no. 133/2016) automatically takes effect. 23, para. (6) of Law 133/2016).

- **Conduct of elections in a state of emergency and intervention of the Commission for Exceptional Situations in restricting the right to be elected, suspension of broadcasting licenses for audiovisual media services¹⁹, organization and conduct of electoral elections and cancellation of registration of candidates designated by the Shor Party²⁰.** Pursuant to Parliament Decision No. 274 of 21 September 2023, the state of emergency was prolonged for an additional 60 days, commencing on 2 October 2023. Consequently, the elections on 5 and 19 November 2023 occurred under the state of emergency. Despite Article 6 of this decision stating that the state of emergency should not interfere with the organization and conduct of elections, Promo-LEX EOM observed alarming instances of the CES's involvement in the electoral process. It is important to note that Law No. 212/2004 on the State of Emergency, Siege, and War (Article 22), along with the stipulations of Parliament Decision No. 274/2023 and correspondingly, No. 41/2022, do not explicitly authorize the Commission to engage in actions that limit the right to be elected. Moreover, this Commission was tasked with implementing measures to counter the risks and threats that warranted the state of emergency. Such interventions have created opportunities for executive overreach in the management and execution of elections, potentially affecting election outcomes and casting doubts on their validity. Given that the CES predominantly consists of government members (often from political parties), there exists a concern that their actions could favor the interests of the political party that endorsed them.
- **Conducting a constitutional review of electoral provisions.** The Law No. 220, ratified on 31 July 2023 and effective from 18 August 2023, imposed new limitations on electoral eligibility (Art. 16, para. 2, letter e)). On 4 August 2023, members from the former "Shor" political party challenged the constitutionality of this law, requesting its suspension pending a thorough review. Subsequently, on 3 October 2023, the Constitutional Court found the contested provision unconstitutional. Promo-LEX EOM alerts that such developments have introduced uncertainties for voters, electoral authorities, and candidates, impacting the electoral process's transparency and predictability. It is worth reminding that the Code of Good Practice in Electoral Matters considers the stability of Electoral Law as crucial for a democratic state governed by the rule of law and essential for the electoral process's integrity.

In a separate case, the constitutionality of specific clauses of the new Electoral Code was challenged as early as February 2023 by two Moldovan parliamentarians. Yet, the Constitutional Court did not review this petition either before the electoral phase commenced or subsequently. Promo-LEX EOM emphasizes that, to uphold the stability of electoral legislation, any doubts regarding the constitutionality or legality of legislative acts must be resolved before the electoral cycle begins. Moreover, while some petitions potentially impacting the electoral process were expediently addressed by the Constitutional Court, other disputed provisions were not accorded equal consideration.²¹

- **Endorsement of electoral candidates by entities other than their nominators.** It was observed by Promo-LEX EOM that in some instances, the status of an independent candidate is merely nominal, with actual support coming from political parties, undermining the principle of equality among electoral competitors. This issue extends to political parties that, while not forming an electoral coalition, back a candidate nominated by a different political party. Furthermore, employing a political party's resources in a campaign without declaring them as party donations

19 [Report No. 4](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 6.

20 [Report No. 2](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 8-10.

21 *Ibidem*, p. 8.

can both diminish campaign financing transparency and lead to the disqualification of the electoral candidate, as stipulated by Art. 102, para. (5), letter (a) of the Electoral Code. MO Promo-LEX has voiced concerns over political parties' declarations of support for independent candidates or those nominated by other parties, especially in cases where candidates initially nominated by them are disqualified.²²

- **Misinterpretation of the right to organize and conduct electoral debates by certain electoral bodies**²³ According to Article 1 of the Electoral Code, electoral debates serve as a means of electoral education and may be freely conducted by interested entities. Furthermore, Article 90 defines electoral debates as a type of electoral audiovisual program, subject to strict regulations to ensure equal broadcasting time and coverage for all electoral competitors. During the observation period, the Promo-LEX Mission reported a case where the City Hall of Durlleşti, Chisinau municipality, and DEC 1/3 Durlleşti unjustifiably restricted electoral debates organized by the Public Association "My City Hall". It appears that both the local public authority and the electoral body misapplied the Electoral Code's conditions for televised electoral debates to those not broadcasted by audiovisual media service providers.

Promo-LEX advocates for and aids in the wider organization and facilitation of electoral debates, encouraging robust participation from electoral competitors, without the necessity for television coverage. We argue that, particularly during the general local elections, it's essential for voters in each constituency to familiarize themselves with the candidates and their platforms. Electoral debates stand as an efficient method for achieving this.

- **Conditions for deregistration of electoral competitors and image transfer from a political party declared unconstitutional to one registered in the electoral race**²⁴. By its judgment declaring the "Shor" Party (PPŞ) unconstitutional, the Constitutional Court determined that the party had acted against the principles of the rule of law, sovereignty, and independence of the Republic of Moldova. The intended outcome of this ruling was for the cessation of the party's activities to be substantive and genuine, rather than merely procedural. Consequently, any transfer of image, activities, or political program from the "Shor" Party (PPŞ) to another political party, or the association of an existing political party with the image of a party declared unconstitutional (through the promotion of the party's representatives, initiatives, and programs they support, by the similarity of symbols and messages, or any other means) stands in violation of the High Court's decision. Therefore, it is imperative that authorities investigate the legality and constitutionality of the Chance Party's (PŞ) deliberate actions in transferring its image from the former "Shor" Party. It is noted that on 30 October 2023, the CEC reviewed complaints from the SIS and Police, identifying that the true beneficiaries of the project announced, financed, and promoted by Ilan Shor - "Moldovan Village"/"Moldovan City" - were the candidates publicly endorsing these initiatives - the PŞ candidates. The CEC determined that the PS representatives breached Article 54, paragraphs (5) and (6) of the Electoral Code regarding campaign financing, voter bribery through the offer and promise of benefits from other charitable acts to influence their voting behavior, employing campaign funds from sources other than the designated "Electoral Fund" account, exceeding the electoral fund limit, and using undeclared financial and material resources. Consequently, the CEC instructed the District Electoral Councils (DEC) to consider revoking the registration of PŞ's candidates nominated for mayor and councillor positions in nine settlements.
- **Delaying the resolution of electoral disputes by raising the exception of unconstitutionality**²⁵. On 9 November 2023, the Constitutional Court declared inadmissible the application concerning the exception of unconstitutionality of Article 225, para. (3) letter (e) of the Administrative Code. This exception was raised by the representative of the Commission

22 [Report No. 4](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 6-7.

23 *Ibidem*, p. 8.

24 [Report No. 4](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 8-10.

25 [Report No. 5](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 6.

for Emergency Situations (President of the CES, Prime Minister Dorin Recean), in the lawsuit initiated by the Chance Party (PȘ) against the Commission’s Decision No. 92 of 3 November 2023. It is worth to remind that this specific decision had cancelled the registration of electoral candidates nominated by the PȘ for the general local elections held on 5 November 2023, deviating from the Electoral Code’s stipulations. While not dismissing the potential grave risks and threats to national security, Promo-LEX EOM observes that the Prime Minister’s action to delay the legality check of the State of Emergency Commission’s provision by invoking the exception of unconstitutionality seems intentional. This is particularly noteworthy considering the rule in question was proposed by the Government and ratified by Parliament less than a year and a half prior. Furthermore, the Constitutional Court underscored that the exception of unconstitutionality serves as a tool enabling citizens to protect themselves against the state authorities when their constitutional rights are compromised by specific legal provisions. This exception is not intended for use by a public authority to negate a normative act passed by another public authority. In instances requiring such intervention, authorities vested with the power to approach the Constitutional Court (including the Government, the Minister of Justice) are entitled to seek a constitutionality review of the normative acts in question.

2.4. Impact of the State of Emergency on the Conduct of the 2023 General Local Elections

The Promo-LEX Election Observation Mission (EOM) observes that after the general local elections, the state of emergency was extended just once for an additional 30 days, starting from 1 December 2023. The explanatory note accompanying the parliamentary decision to prolong the state of emergency²⁶ stated that “the measures implemented during this period were essential to manage an unprecedented situation, where the conflict in Ukraine led to concurrent energy and refugee crises, along with security threats aimed at destabilizing the Republic of Moldova. The Government and the Emergency Situations Commission acted within the limits of the authority granted by the Parliament. Furthermore, there was no encroachment upon the fundamental rights of citizens, and both the Government and the Emergency Situations Commission acted transparently. The deviations from the legal norms were proportional and necessary for the effective management and resolution of the crisis situation.”

However, considering the actions taken by the CES during the elections, the validity of these claims can be questioned:

- a) Regarding the assertion that the mandate granted by Parliament was not exceeded, the state of emergency should not have impacted the general local elections, as per Article 6 of Parliament Decision No 274/2023;
- b) The claim of no interference with the fundamental rights of citizens is debatable, given that the candidacy registrations for the Chance Party (PȘ) were revoked, deviating from the Electoral Code and infringing upon the right to be elected;
- c) The proportionality and necessity of deviations from the legal framework to address the emergency situation are also under scrutiny. Despite law enforcement bodies (SIS, Police) reporting “activities aimed at undermining state security and engaging in hybrid influence operations—disinformation and external informational influence on behalf of a foreign state”²⁷—no further information was provided to the public about the objectives of the investigations conducted after the general local elections concluded.

26 [Information note](#) on Parliament’s Draft Resolution on the Extension of the State of Emergency.

27 [SIS Letter](#) on Particularly Serious Threats to National Security.

Upon the expiration of the deadline on 30 December 2023, the state of emergency was not extended. It's important to note that during the electoral period, the Commission for Emergency Situations (CES) implemented several measures directly affecting the organization and conduct of the elections:

- 1) Restrictions on eligibility for election;
- 2) Suspension of broadcasting licenses;
- 3) Cancellation of the registration of candidates nominated by the PŞ.

According to Article 4, paragraph (3) of Law No. 212/2004²⁸, following the cessation of the state of emergency, siege, or war conditions, the normative acts enacted during this period are annulled automatically, without the need for a formal declaration. Consequently, all such measures were invalidated, although the dispute over the CES's decision to cancel the registration of candidates nominated by the SP remains unresolved.

Promo-LEX EOM observes that the holding of elections under a state of emergency permitted the CES to influence the electoral process, contravening the principle of legal certainty. To ensure a fair electoral process, where equal opportunities for all electoral competitors and the rights to vote and stand for election are protected, any interference by the Commission for Emergency Situations should be deemed unacceptable. Therefore, we recommend that Parliament revise the Law on the State of Emergency, Siege and War to explicitly prohibit the conduct of elections during periods declared as a state of emergency, siege, or war.

28 [Law](#) No 212 of 24.06.2004 on the State of Emergency, Siege and War.

CHAPTER III

ELECTORAL BODIES

Unlike national elections (Parliamentary and Presidential), general local elections involve a more intricate organization due to the activation of three levels of subordinate electoral bodies: second and first level District Electoral Councils (DEC I and DEC II) and Precinct Electoral Bureaus (PEBs). The primary organizational efforts are executed by DECs I, established exclusively for local elections.

3.1. Activity of the Central Electoral Commission

As a permanent national electoral authority, the CEC coordinated the activities of subordinate electoral bodies for the preparation and conduct of elections. The general local elections on 5 (19) November 2023 were the first conducted nationwide by the current CEC composition and in accordance with the new Electoral Code.

Decisions Approval for Election Organization and Conduct. The CEC's website indicates that for the organization and execution of the November 5 (19), 2023, general local elections, the electoral authority approved a total of 431 decisions. A significant portion of these decisions, 112 (26%), pertained to the operations of lower-tier electoral bodies, and 95 (22%) involved the accreditation/confirmation of individuals authorized to partake in the electoral process (refer to Annex no. 1).

Accreditation of Observers. According to the new provisions of the Electoral Code (art. 88), only public associations and institutions for training and research in the electoral field are eligible to seek accreditation for national observers. Consequently, electoral contenders are limited to enlisting representatives only. This adjustment led to a 23% reduction in the quantity of national observers accredited by the CEC for the 2023 local elections, relative to those in 2019, and a cumulative decrease of 42% when compared to the national elections held in 2020 and 2021.

Thus, in order to monitor the general local elections of 5 (19) November 2023, the central electoral authority accredited 1,515 observers, of which 1,118 national observers. Out of the total number of national observers, the Promo-LEX Association accredited 998 (89%) (see Annex no. 1).

Additionally, an increased interest from international observers was noted for these elections compared to the 2019 local elections. Upon request, the CEC accredited 397 international observers and experts and confirmed 159 individuals as their interpreters. In this context, it is noteworthy that, following recommendations from the Ministry of Foreign

Affairs and European Integration and the Security and Intelligence Service (SIS),²⁹ the CEC denied accreditation to seven individuals proposed for accreditation by the OSCE Office for Democratic Institutions and Human Rights.

Table no. 1.

Evolution of the number of observers accredited by the CEC

	2019 General Local Election	2020 Presidential Election	2021 Early Parliamentary Elections	2023 General Local Election
Accredited National Observers	1.661	2.018	1.800	1.118
Accredited International Observers	140	332	642	397
TOTAL	1.801	2.350	2.442	1.515

Approval of Journalists. To cover the general local elections and keep the public informed on electoral matters, media entities were able, for the first time, to seek confirmation from the CEC for the approval of legitimate journalists. Article 89, paragraph (6), granted journalists, including freelancers such as bloggers and vloggers, access to meetings of electoral bodies, electoral operations, and electoral information on equal footing with observers.

According to CEC, the authority confirmed 57 journalists from 12 domestic media entities/institutions, as detailed in Annex No. 1. No decisions of refusal were recorded. It is noteworthy that observers did not encounter instances of inappropriate involvement by accredited media representatives in the electoral process, marking a departure from previous practices.³⁰

Approval of Electoral Competitors' Representatives. For the observed electoral period, the electoral authority confirmed representatives of six electoral competitors³¹. We find that their number does not differ from that of the 2019 elections, when seven representatives were approved at CEC level.

Approval of Public Interest Messages. Pursuant to Art. 17 para. (2) of Law no 62 on Advertising³² and Article 90, paragraph (4) of the Electoral Code, during the electoral period of the general elections, only messages of public interest approved by the CEC may be broadcast. Thus, the Commission approved the dissemination of 29 messages of public interest³³ prepared by seven entities for the general local elections of 5 (19) November 2023 (see Annex no. 1). The CEC also prohibited the mayoral offices of Balti and Chisinau from distributing informational materials to citizens about the outcomes of public authority activities. These information materials were identified by the electoral authority as advertising containing elements of electoral campaigning, created and disseminated through the direct and indirect use of administrative resources.³⁴

It is noteworthy that the Government was tasked with establishing the Council on Messages of Public Interest by April 2023³⁵. This specialized body would have undoubtedly

29 Information obtained by Promo-LEX observers from the Communication, Public Relations and Media Directorate of the CEC.

30 [Press Release](#): Promo-LEX Observation Mission of the New Local Elections of 20 May 2018: new details on the conduct of the elections in the 7 constituencies.

31 Revival Party (PR); National Alternative Movement (MAN); Party of Development and Consolidation of Moldova (PDCM); Action and Solidarity Party (PAS); Party of Socialists of the Republic of Moldova (PSRM); Respect Moldova Movement (MRM).

32 [Law](#) No 62 on Advertising of 17 March 2022.

33 Public interest [messages](#) approved by CEC.

34 [Report No. 1](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 28.

35 Art. 53, paragraph (3) of the Law on Advertising establishes that until April 8, 2023, the Government was to approve regulations on the structure, manner of establishment, organization and functioning of the Council.

assisted the CEC. However, as of the publication of this report, this obligation has not been fulfilled. It is important to mention that the implementation of the *aforementioned* legal provisions by the CEC has sparked discussions regarding the authority's capabilities and jurisdiction in this area. To date, the institution had not been assigned such responsibilities, as the issue lies within a specialized domain rather than a general one.³⁶

Authorization on Conducting Opinion Polls and Exit Polls. According to art. 90, para. 12 of the Electoral Code, during the electoral campaign period, opinion polls and exit polls may be carried out and disseminated only after their prior authorization by the CEC. The authorization of opinion polls was carried out on the basis of a new Regulation, which provides for more detailed and rigorous conditions regarding the content of the authorization file and the data collection phase.

For the general local elections of November 5 (19), 2023, the CEC granted authorization for 16 opinion polls regarding voters' political preferences, to be carried out by seven entities. Additionally, the commission approved the publication of five opinion polls (refer to Annex No. 1). However, the CEC denied authorization for a poll proposed by "INTELLECT GROUP" LLC due to the poll's financier not being registered in the Republic of Moldova, as required by the legal framework.³⁷ In the same subject, we mention that Promo-LEX EOM found a case of collection by "C.B.S.-RESEARCH" LLC of data for an opinion poll contrary to the legal provisions³⁸, namely before the issuance of the CEC decision on its authorization³⁹. No requests for authorization of exit polls were made or granted for Election Day.

At the same time, during the initial phase of the electoral campaign, there were comments regarding the CEC'S varied approach to the questionnaires from different organizations in the process of authorizing opinion polls⁴⁰. On the other hand, the CEC clarified that " the responsibility for the formulation and nature of the questions rests solely with the entities commissioning or conducting the opinion polls".

Promo-LEX notes a significant increase in interest among data collection agencies (and their sponsors) in voter political preferences for the 2023 general local elections, with a fivefold rise in requests compared to the previous local elections, which saw three applications for exit polls (with one approved and two declined)⁴¹. Nevertheless, this interest in local elections remains lower than that observed during the presidential and parliamentary elections, where the number of polls conducted ranged from 25 (during the 2021 Early Parliamentary Elections) to 27 (during the 2020 Presidential Elections).

Certification of Electoral Officials. The Promo-LEX Association welcomed the introduction of a mandatory requirement in the new Electoral Code for electoral officials to hold qualification certificates issued by CICDE upon completing advanced training courses. As a transitional measure, the Code stipulates that individuals listed in the Electoral Officials Register (EOR) at the time of its entry into force are deemed certified by default, with the qualification certificates being valid for 2 years.

However, the Promo-LEX EOM observed that CICDE and the CEC faced the challenge of certifying an unexpectedly high number of potential electoral officials. The capacity of these institutions to meet the new legal requirements was hindered by limited time, inadequate human and financial resources, and CICDE's diminished ability to accurately estimate the workload necessary for training and certifying a sufficient number of electoral officials.

36 [Report No. 1](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 28.

37 [CEC Decision no. 1332](#) on the request of "INTELLECT GROUP" LLC regarding the authorization to carry out the opinion poll on the political preferences of voters.

38 Point 11 of the [Regulation](#) on the Organization and Conduct of Opinion Polls and Exit Polls During the Electoral Period.

39 [Report No. 3](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 28.

40 IMAS press [conference](#) on the presentation of the survey results: [Socio-political reality and media perception](#), min. 38.

41 [Report No. 6](#). Promo-LEX observation mission of the new general and parliamentary local elections of October 20 (November 3) 2019, p. 12-13.

Under these circumstances, it was noted CICDE and CEC organized three certification sessions for 3,247 people. According to the information available on the CICDE website⁴², a total of 2,057 people were certified, with a pass rate of 78%⁴³. Promo-LEX observed a total of 35 certification procedures for potential members of electoral bodies conducted on September 14, 23, and October 9, 10. According to observers, the procedure was conducted properly in the vast majority of cases. Isolated incidents of non-compliance involved attempts to cheat and some candidates tried to take the test multiple times⁴⁴.

In conclusion, Promo-LEX continues to advocate for the strengthening of the certification process. To ensure that certification is not a superficial procedure but one that adheres to legal provisions and aims at professionalizing the electoral official corps, prior training of these officials is necessary.

3.2. Activity of Lower-Level Electoral Bodies (DEC II, DEC I, PEB)

The organization and conduct of the general local elections in 2023 were ensured by 35 level II DEC (which, according to the new Electoral Code, will permanently act in the person of the president appointed in office according to Law no. 158/2008 on civil service and civil servant status), 896 DEC I and 1,958 PEBs (11 fewer than in 2019).

The work schedule was adhered to by the electoral bodies in the vast majority of cases. The proportion of electoral bodies found open during observer visits varied between 99% for DECs II, 94% for DECs I and 90% for PEBs.

Location of Premises and their Accessibility. The assessment of the physical accessibility of the headquarters of the lower-level electoral bodies was carried out by the Promo-LEX EOM based on three qualifiers⁴⁵: accessible – there is an access ramp of min. 90 cm wide and a support bar of approx. 75 cm high; partially accessible – with an access ramp, but without the support bar; and inaccessible – lacking both elements.

From this perspective, according to Promo-LEX observers, the accessibility of electoral bodies' offices remains a problem in organizing elections (see Annex no. 2). In the case of DEC II, only 17 (49%) were accessible to vulnerable groups of people. With regard to the physical accessibility of DEC I and PEBs, the situation is also difficult, with an average of 43% of the premises deemed inaccessible. Thus, in the case of DEC I, Promo-LEX observers found that only 245 (28%) are accessible to vulnerable groups of people, 239 (27%) – partially accessible. With reference to the physical accessibility of 1,480 PEB sites, we conclude that 505 (34%) are accessible to vulnerable groups and 388 (26%) – partially accessible. The comparative analysis of the situation allows us to note the lack of progress in this regard compared to the early parliamentary elections in 2021 (32% – accessible; 26% – partially accessible; 42% – inaccessible). Promo-LEX EOM points out that the accessibility of people with special locomotor needs remains a problem, and the creation of accessibility conditions is imperative. Moreover, we emphasize that 92% of the polling stations/PEBs are based in public utility buildings.

Considering the placement of lower-level electoral bodies within the premises of public institutions, as well as acknowledging the permanent status of the DEC II, Promo-LEX reiterates its recommendation to local public administrations to ensure accessibility conditions in buildings of public interest.

42 [Exams for the certification](#) of training/specialization in the electoral field.

43 Of the 3,247 people registered, 2,634 came to the exam.

44 [Report No. 2](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 28. 3. Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 28.

45 Promo-LEX observers assessed the accessibility of polling station premises by exclusively evaluating the access conditions of those buildings. Thus, accessibility was not analyzed from the perspective of the path to the building/polling station, as well as the traffic routes inside the building (corridors, halls, stairs, ramps, elevators); the restroom facilities, and the space where the voting process is organized.

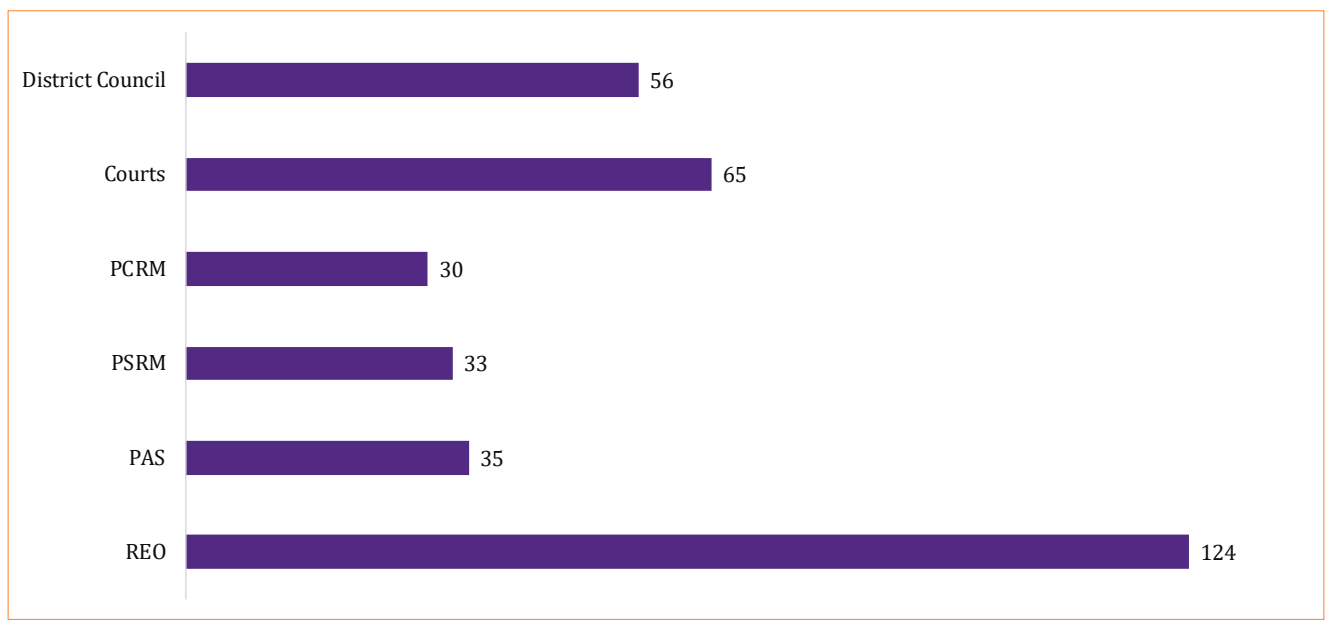
As for the locations of polling stations, a majority were established in houses of culture. There was also a noticeable increase in the number of polling stations set up in educational facilities, including preschools, in comparison to the national elections held in November 2020 and July 2021. Specifically, around 42% of polling stations were located in houses of culture, while about 38% were situated in educational institutions (refer to Annex No. 2).

Confirmation and Changes in Composition: The frequent changes in the composition of lower-level electoral bodies impair the quality of the electoral process. Observations indicate that the lower the hierarchical level of the electoral body, the higher the incidence of changes. With regard to responsibilities in the general local elections and the extent of changes, it is observed that the most affected institution is the DEC I.

With reference to DEC II, according to the legal norm, they consist of an odd number of members, of at least 7 and no more than 11 persons. In the case of 33 DEC II (94%) the numerical composition was established in number of 11 members, while for two DEC II (no. 5 Basarabasca and no. 15 Dubasari) the composition was set at nine members. It is noteworthy that in the case of two DEC II, the nominal composition was not complete even on Election Day (no. 4 Anenii Noi – 10 members of 11 and no. 26 Rezina – 9 members out of 11).

Chart No. 1.

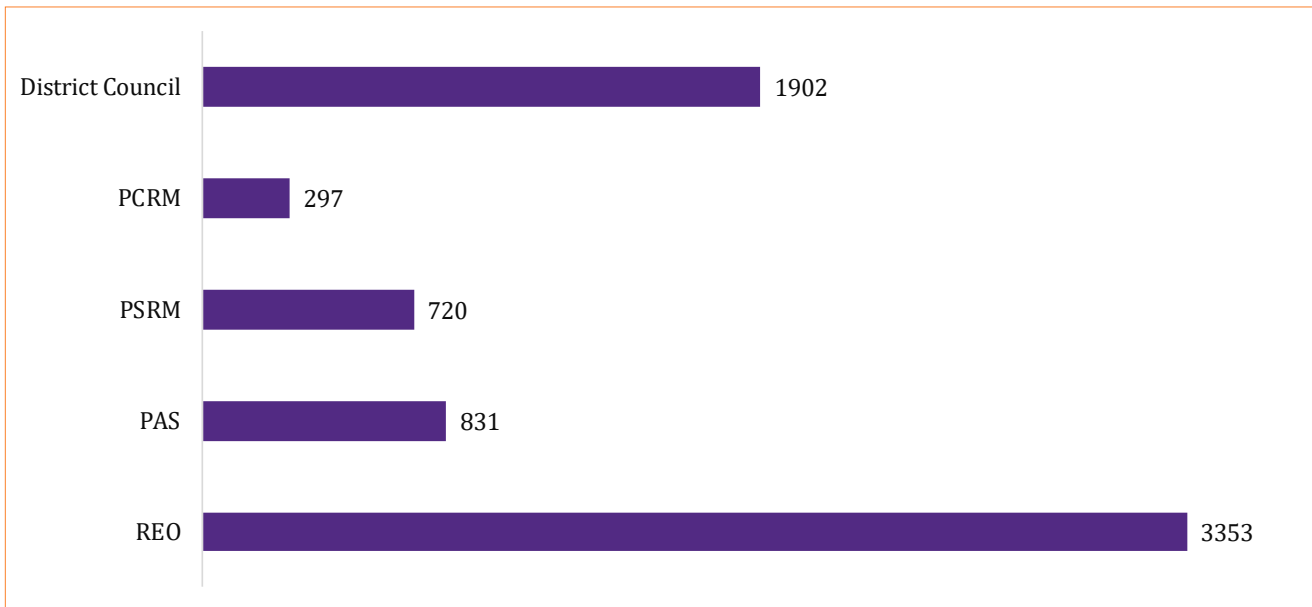
Nomination of Members to the DEC II



During the observed period, the Promo-LEX EOM noted the completion of the nominal composition for 29 DEC II (except for DEC II no. 5 Basarabasca and no. 9 Calarasi; no. 10 Cauşeni; nr. 18 Floresti; no. 29 Soroaca and no. 32 Stefan Voda) and 28 cases of changes in the nominal composition of 18 Dec II.

With reference to DEC I, according to the legal norm, they consist of an odd number of members, of at least 7 and no more than 11 persons. In the case of 535 DEC I (60%) the numeric composition was established in number of seven members, for 317 DEC I (35%) at nine members, and for 44 DEC I (5%) at 11 members. The appointment of members by the entities holding this right is illustrated in Chart No. 2.

Nomination of Members to the DEC I



Thus, we note that no political party represented from Parliament appointed members to all 896 DEC I. Also, based on the information analyzed by the observers in the DEC I establishment decisions, we conclude that in at least 132 DEC I (15%) the number of members appointed from the first level local council is more than two, contrary to the rule in Article 35 para. (7) of the Electoral Code.

During the observed period, Promo-LEX EOM observed 412 cases of change in the nominal composition of 294 DEC I (33%). Furthermore, Promo-LEX observers reported 73 violations related to electoral body members not adhering to compatibility and activity restrictions:

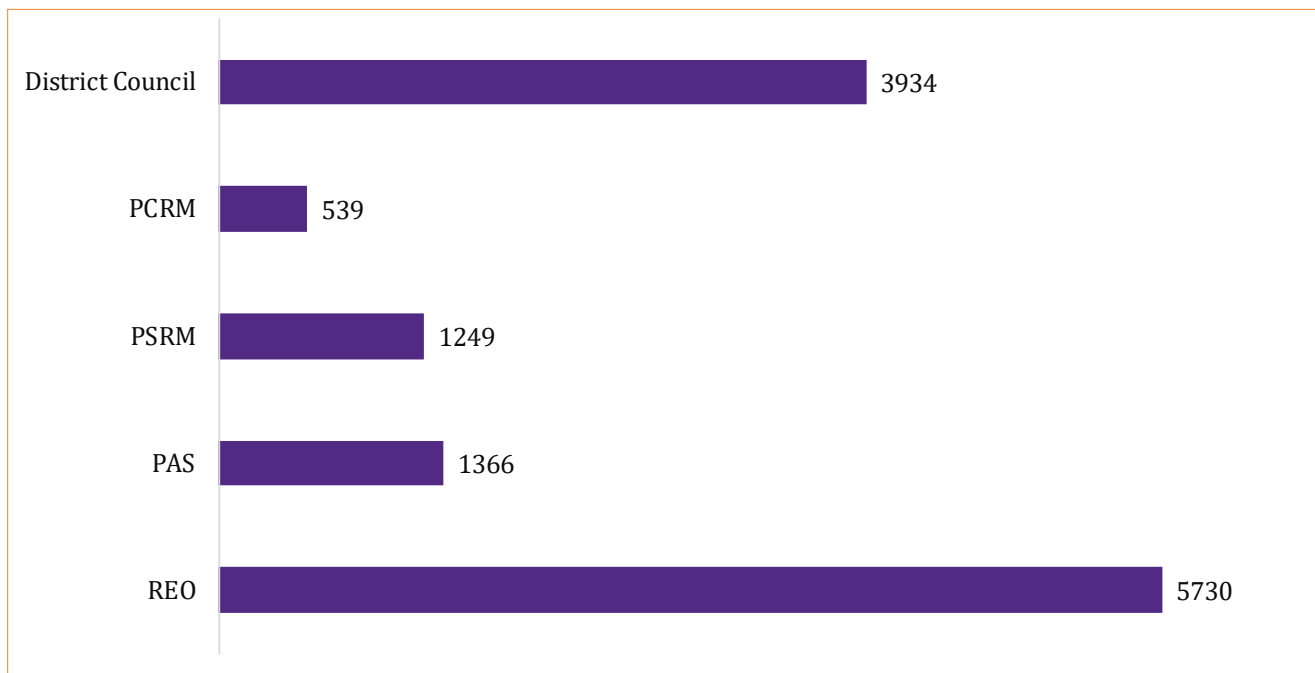
- 56 cases involved being the spouse or a first-degree relative of a candidate;
- 14 cases were due to unexcused absences of members from two consecutive electoral body meetings;
- 2 cases involved participation as a subject in the electoral process;
- 1 case was a refusal to execute DEC decisions.

According to the reported information, in 5 cases the members were sanctioned by revocation from the electoral body. For the remainder, the removal of incompatibilities and restrictions was ensured by excluding the member from the composition of the body on the basis of their resignation request.

Regarding the PEBs, the legal norm establishes a composition from 5 to 11 members (excluding PEBs abroad). Out of the total of 1,480 bureaus⁴⁶, in the case of 326 PEBs (22%) the numerical composition was set at 11 members, for 648 PEBs (44%) at nine members, for 435 PEBs (29%) at seven members, and for 71 PEBs (5%) at five members.

46 Of the 1,499 PEBs visited by observers, data collection on the composition of the electoral body was only possible for 1,480.

Nomination of Members to the PEB



At this level as well (PEB), the Promo-LEX EOM notes that no political party represented in Parliament appointed its member to all 1,958 electoral bureaus. Additionally, based on observations from the PEBs establishment decisions, it is concluded that in at least 20 offices, the number of members appointed by the local council exceeds three, contrary to Article 38, paragraph (10) of the Electoral Code.

During the observation period, Promo-LEX EOM identified changes in the nominal composition of 240 PEBs in 337 cases. Promo-LEX observers also reported 28 instances of electoral body members not complying with the required incompatibilities and restrictions in their activities:

- 19 cases involved being the spouse or a first-degree relative of a candidate;
- 6 cases were due to unexcused absences of members from two consecutive electoral body meetings;
- 1 case involved participation as a subject in the electoral process;
- 2 cases were refusals to execute DEC decisions.

According to the reported information, in 4 cases the members were sanctioned by revocation from the electoral body (unexcused absence (2); familial relation (2)). For the remainder, the removal of incompatibilities and restrictions was ensured by excluding the member from the composition of the body on the basis of their resignation request.

Regarding the gender composition, although Article 17, paragraph (5) stipulates that the establishment of electoral bodies, as well as the procedures for appointing members and electing the President and Secretary, should ensure adherence to the principle of gender equality, it is evident that this provision is not upheld across all lower-level electoral bodies.

Across all three levels of electoral bodies, particularly in DECs I and PEBs, there is a disproportionate representation of women, with percentages ranging from 73% in DECs II to approximately 90% in DECs I and PEBs. Leadership positions within these bodies are predominantly occupied by women as well. For instance, in DECs II, gender balance in

leadership positions was observed in 40% of the boards, whereas in DEC I and PEBs, it was seen in only 14% of the bodies.

The secret voting procedure for electing the leadership of DEC I was followed in the vast majority of instances, with the exception of DEC I No. 2/2 Sadovoe and No. 16/7 Brătușeni. With reference to the open voting procedure for electing the management of the PEBs, Promo-LEX observers reported that the procedure was not adhered to in 34 instances⁴⁷.

The public information on the activity of the lower electoral bodies⁴⁸ was analyzed by the Promo-LEX observers based on the publication of the following categories of information:

- on the composition of the electoral body and its working hours;
- on the place and time of receipt of documents;
- regarding the list of competitors.

Information on the composition of electoral bodies was provided more defectively by PEBs – only 63%, compared to DEC II (100%) and DEC I (81%). The working hours of the electoral bodies were made public in the absolute majority of cases, with few exceptions. Public information on the place and time of receipt of documents was provided by DEC II and I, in the same proportion, over 97% and 91%, respectively. Public information on the list of competitors was less provided by electoral bodies, especially by PEBs – only 65% of the offices visited. Thus, we find that not all lower electoral bodies, especially PEBs and DEC I, comply with the legislation and provide the minimum legally prescribed electoral information.

Accreditation of Observers: There was a notable decline in the number of accredited observers at the level of the lower electoral bodies (DEC I and II), reflecting a trend similar to what was observed at the Central Election Commission (CEC). In contrast to the 2019 local elections, during which at least 2,023 observers from electoral competitors were accredited at the levels of DEC I and II, the 5th (19th) November 2023 elections saw a significant reduction. According to Promo-LEX, only nine observers were accredited, distributed among the Association of Parents of Persons with Disabilities “Eternity” (5 observers), the Center for International Communication and Human Rights (3 observers), and the Public Association „Alliance for Dolna” (1 observer).

Confirmation of Representatives of Electoral Competitors and Trustworthy Persons.

From the information collected by observers, DEC II confirmed at least 50 representatives of 17 electoral competitors⁴⁹, and DEC I confirmed at least 766 representatives for 48 electoral competitors, including 29 political parties and 19 independent candidates. Most representatives of the electoral competitors were confirmed by PSRM (at least 148), PAS (at least 124), PȘ (at least 99), PSDE (at least 92)⁵⁰. For comparison, we mention that the number of representatives of the electoral competitors confirmed at the level of DEC I increased about four times compared to the general local elections of 2019, which can be explained by the fact that the competitors can only confirm representatives, not observers.

47 PEB no. 2/20, 2/21, 2/22, 2/26, 2/30, 2/38, 2/44, 2/45, 2/47, 2/54, 2/55, 2/56 and 2/59 – Chisinau mun.; no. 7/19, 7/20, 7/30, 7/41 and 7/61 – Cahul district; no. 11/38 – Cimislia d.; no. 20/35 – Hincesti d.; no. 21/24 – Ialoveni d.; no. 23/7, 23/8, 23/19, 23/31, 23/32, 23/37 and 23/42 – Nisporeni d.; no. 25/82 – Orhei d.; no. 27/18 and 27/19 – Râșcani d.; no. 31/22 and 31/29 – Soldanesti d.; 36/60 – ATUG.

48 The degree of information was observed based on the following information channels: the headquarters (entrance) of the DEC or of the institution where it is located, the information panel nearby, the web page of the public authority.

49 Most representatives of the electoral competitors were confirmed from SP, PR, BE Ruslan Codreanu and PPPDA (at least 6); PPDA (at least 5); PNL (at least 4); PN, PLDM and PL (at least 3); PDMM, PDCM, PCRM, PAS, MRM, MAN, LOC and CUBE (at least 1).

50 For the other electoral competitors the number of confirmed representatives varies between 1 and 41: PDCM (at least 41); PLDM (at least 40); LOC (at least 36); MRM and PPPDA (at least 28); PR (at least 25); CUBE (at least 18); PS (at least 11); CC (at least 9); MAN (at least 8); PCRM and PN (at least 6); BE Ruslan Codreanu (at least 4); FASM (at least 3); PL, PNL, PPDA, PVE and PPVP (at least 2); PDMM, ALDE, PPM, PNM, PPRM and PACE (at least 1); 19 ICs (cumulative 24).

PEBs also confirmed about four times more representatives than in the previous local elections, with at least 1,694 representatives for 77 electoral competitors, including 26 political parties and 51 independent candidates. Most representatives of electoral competitors were confirmed by PSRM (at least 346), PȘ (292), PAS (at least 234), PR (at least 149), PSDE (at least 124), PDCM (at least 90)⁵¹.

Single cases of refusal to confirm representatives were reported: ALDE (1) and PDCM (3) on procedural grounds. In addition, we recall that the representatives of the candidates designated by the PȘ have had their confirmation cancelled together with the cancellation of the registration of the candidates designated for the position of mayor and counselor.

The institution of trusted persons continues to be little valued by competitors. DECs II confirmed at least five persons of confidence for four electoral competitors⁵², and DEC I confirmed at least 69 from 14 competitors, including 12 political parties and two independent candidates. Most trusted persons were confirmed from PAS (at least 22), PSRM and PȘ (at least 10 each)⁵³. Compared to 2019, the number has not changed significantly.

Approval of Journalists. According to the reports of the observers, DECs II confirmed at least 74 journalists from five media entities/institutions and one freelancer, in order to cover and monitor the general local elections (refer to Annex No. 1). No decisions of refusal were recorded.

Challenges in the Functioning of Lower-level Electoral Bodies. Based on discussions with electoral officials, Promo-LEX observers identified a range of difficulties that hindered the proper functioning of lower electoral bodies, among the most significant being:

- incomplete electoral body composition and/or frequent absences of members from meetings;
- high workload;
- shortage of certified individuals for establishing lower hierarchical electoral bodies;
- lack of adequate facilities and conducive working conditions, including electricity and heating, particularly affecting DEC I and PEB operations;
- delays and inadequacies in technical and logistical support;
- frequent adjustments to the nominal composition of electoral bodies due to incompatibilities outlined in the Electoral Code.

Regrettably, it becomes clear that the majority of these issues stem from a critical shortage or inadequate training of human resources. This situation suggests a pressing need for more comprehensive analyses aimed at determining effective strategies for improving the organization and execution of future electoral processes.

Obstruction of Free Observation. The Promo-LEX EOM highlights instances of hindrance in the unimpeded observation of the electoral process, specifically two incidents involving DEC II (no. 1 Chisinau and no. 5 Basarabasca) and 16 instances of obstruction at DEC I⁵⁴. According to reports received by the Mission, Promo-LEX observers were denied access to comprehensive electoral materials.⁵⁵ It is crucial to reiterate that observers, in fulfilling their roles, are entitled to access all electoral data without restrictions.

51 For the other electoral competitors the number of confirmed representatives varies between 1 and 59: PN (at least 59); PS (at least 39); FASM (at least 37); PLDM (at least 33); MRM (at least 31); LOC (at least 30); PPPDA (at least 26); CUBE (at least 20); MAN (at least 13); PCRM (at least 12); ALDE (at least 11); PNL (at least 7); CC (at least 4); PPDA and PPVP (at least 3); PDMM and PL (at least 2); PVE, MPSN and PPN (at least 1); 51 ICs (cumulative 124).

52 Two independent candidates (at least 1 for each); MRM (at least 1); PR (at least 2).

53 MRM (at least 6); MAN (at least 5); PS (at least 4); PPPDA and PSDE (at least 3); CC, PLDM, PR, PDCM and the two ICs (at least 1).

54 [Report No. 3](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. [28](#). [Report No. 4](#). Promo-LEX Observation Mission to the General Local Elections of November 5, 2023, p. 14.

55 Art. 88 para. (9) Electoral Code: "Observers have access to electoral information, electoral lists, minutes drawn up by electoral bodies, may make photo and video recordings with the notification of the president of the electoral body, without endangering the secrecy and security of voting and the protection of personal data".

Involvement of Electoral Officials in Campaign Activities. The Promo-LEX EOM identified an instance of campaign activity conducted by electoral officials. Specifically, during a visit to DEC no. 34/10 Casla (r. Telenesti), flyers from the PAS party were discovered within the electoral office, evidently prepared for distribution to the public. It is crucial to highlight that according to Article 42, para. (1), letters a) and e), in their official capacity, electoral officials are prohibited from engaging in any activities as participants in the electoral process and are not permitted to make statements or engage in campaign activities either in support of or against any electoral competitors.

3.3. Evaluation of Lower-level Electoral Bodies Performance by Candidates and Other Election Stakeholders

Promo-LEX EOM, in accordance with the observation methodology, conducted a series of interviews with candidates, as well as with electoral officials, media representatives, local activists. One of the topics discussed concerned the performance and activities of territorial electoral bodies (DEC II, DEC I and PEBs).

Most of the interviewed subjects appreciated the activity of the lower-level electoral bodies as transparent and compliant with the electoral legislation both on the procedure for registration of candidates and on the organization of the campaign and Election Day. However, in the opinion of representatives of some electoral competitors, from both the parliamentary and extra-parliamentary opposition, expressed concerns regarding the impartiality of the permanent presidents of DEC II, who are employees of the CEC. They suggested that DEC presidents should be elected by the members of the respective body, as was the practice previously.

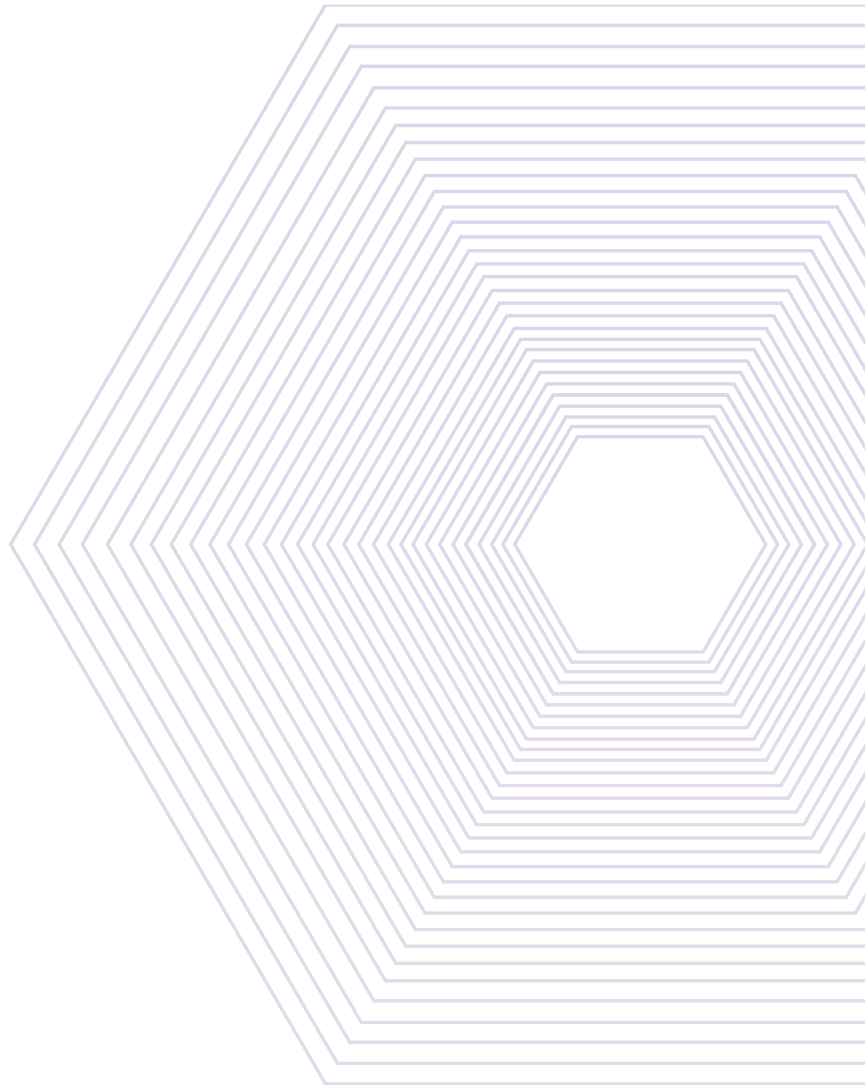
The issue of a general lack of human resources, particularly of qualified personnel, and the challenge of filling vacant positions were universally noted among the respondents. Specific concerns include the absence of competent individuals, the familial connections of some DEC members with candidates, and the diminishing population in rural areas. Furthermore, in certain instances, DEC I members were criticized for perceived incompetence and alleged bias towards local government authorities.

Some members of the electoral bodies have noted that the certification and training processes were initiated late, posing substantial challenges due to the high number of individuals needing certification in a short timeframe. This critical step should have been strategically planned and executed well in advance as one of the primary organizational measures of the electoral campaign.

The logistical provision of the lower-level electoral bodies was another issue mentioned by the electoral officials. Issues included delays in the provision of necessary office supplies and equipment, as well as internet connectivity problems, especially during the initial phase of DEC I activities. Instructional materials were sometimes delivered late, and in certain cases, DEC I members had to utilize their own resources at the start. Collecting materials from DEC II in multiple phases presented additional complications, with DEC I in first-level municipalities, responsible for multiple PEBs, feeling this impact acutely. A recommendation for DEC I in larger settlements involves augmenting the staff complement to address these challenges more effectively.

Evolutively, the Promo-LEX EOM draws attention to the issue of providing professional human resources, in particular, of DEC I. The level of dissatisfaction among candidates and other stakeholders regarding the procedural management by this electoral body has notably increased compared to previous local elections. In light of objective factors,

such as the ongoing exodus of the active workforce and internal migration towards urban centers, combined with the dwindling populations in many first-level ATUs, there is an urgent need for decisive action before the next general local elections. Measures could include administrative-territorial reorganization to avert the further exacerbation of these challenges. It is worth noting that, according to the National Bureau of Statistics and expert analyses, as of January 1, 2023, 469 (52%) of the 896 first-level ATUs that elected mayors had populations below 1,500 inhabitants,⁵⁶ despite the legal requirement for independent ATUs to have, as a general rule, at least 1,500 residents⁵⁷.



56 [400 inhabitants](#) and less: 10 smallest villages where mayors are to be elected.

57 [Law No. 764](#) of 27.12.2001 on the Administrative-Territorial Organization of the Republic of Moldova.

CHAPTER IV

ELECTORAL COMPLAINTS

4.1. Examination of Complaints in the Context of General Local Elections

4.1.1. Complaints Submitted to the CEC

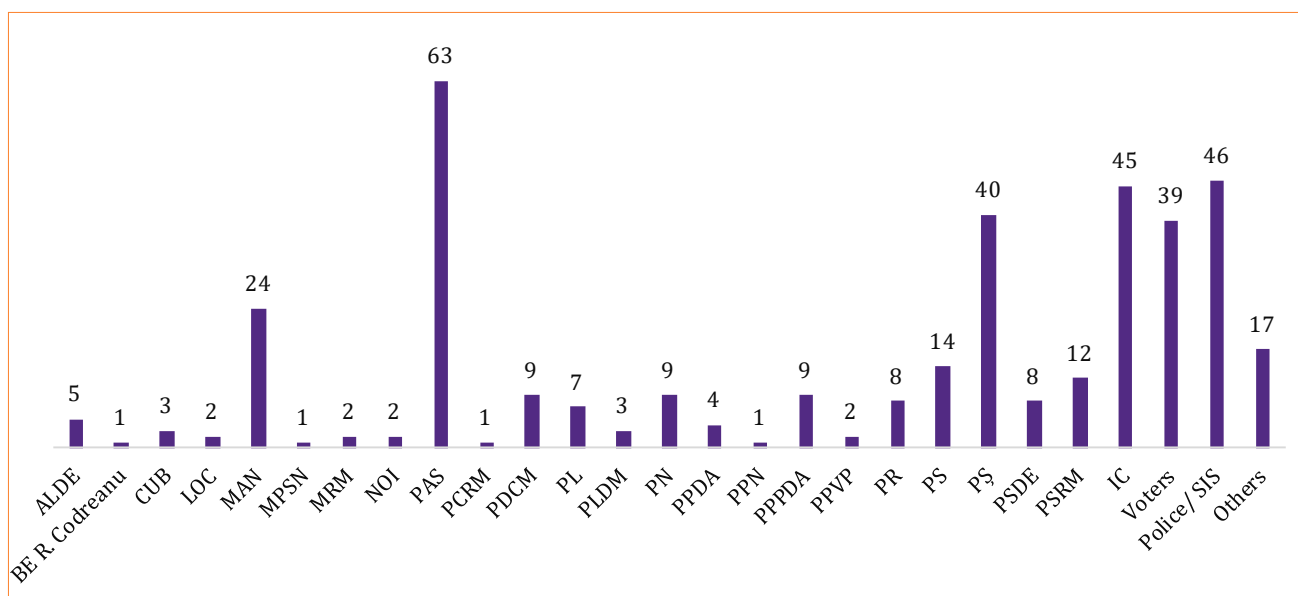
During the general local elections, approximately **370 complaints**, (including requests, petitions, and notifications), were submitted to the CEC, marking a significant increase—sevenfold compared to the 2019 general local elections. However, the Commission officially recognized and made public only 126 (34%)⁵⁸ of those identified by Promo-LEX EOM. The remainder of the complaints or their responses were published sporadically in other sections, leading to ambiguity regarding the CEC’s criteria for the registration and public disclosure of the complaints received as electoral challenges.

This observed practice, noted in previous elections as well, led to the proposal and acceptance of a broader definition of “complaints” in Article 1 of the Electoral Code, alongside criteria that would include requests or notifications reporting violations of electoral legislation under this definition. Regrettably, while these changes have not significantly enhanced the transparency and predictability of the electoral bodies’ actions, they have positively impacted the timely examination of electoral complaints.

Among the 370 complaints received, a substantial number, 230 complaints, were filed by potential candidates, political parties, and electoral competitors nominated by political parties. Independent candidates submitted 45 complaints, while representatives from law enforcement bodies, (Police, SIS), filed 46 complaints. Voters themselves lodged 39 complaints, and 17 were submitted by other entities (as illustrated in Chart No. 4).

58 [Complaints lodged with the Central Electoral Commission.](#)

Chart No. 4.
Complaints



In a departure from previous elections, law enforcement bodies emerged as notable reporters of a significant number of violations of electoral legislation. Promo-LEX advocates for a proactive approach to recurrent electoral issues, (such as irregularities in campaign financing, voter corruption, abuse of administrative resources, and the use of discriminatory and hateful language, etc.). This approach should involve not just law enforcement bodies but also justice actors, to address these persistent problems effectively.

However, the Promo-LEX EOM emphasizes that law enforcement bodies must avoid giving the appearance of being an election participant or an active entity capable of influencing election outcomes. Their role should strictly be to ensure public order and security, prevent, investigate, and detect crimes and offenses, and support electoral bodies in maintaining the integrity of the electoral process. Concerns about neutrality and non-interference may arise, particularly when complaints are filed exclusively against specific electoral competitors⁵⁹, raising questions about the impartiality of law enforcement bodies.⁶⁰

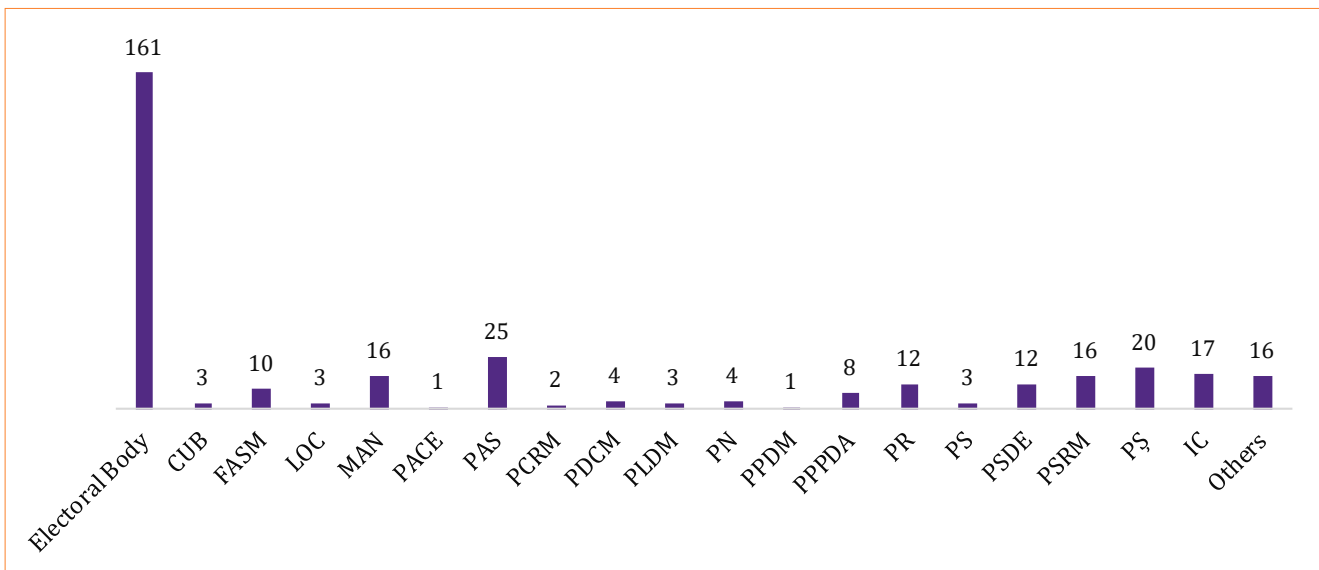
Most complaints were lodged against actions/inactions and documents of electoral bodies (161) and against actions of political parties and their nominated candidates (143) (Chart No. 5).

59 Most of the complaints to law enforcement bodies concerned alleged illegal actions of the electoral competitors PS, PR, FASM. Other complaints from law enforcement bodies concerned the actions of PSRM, PLDM, PACE, CUB and independent candidates.

60 One of the [guiding principles for public security during elections](#), based on OSCE commitments and other international standards, the principle of neutrality and non-interference states that public security providers should not be involved in politics, take part in or show preferential support for any specific party or candidate. They should remain neutral and be perceived as impartial. OSCE Guidelines for Public Security Providers in Elections.

Chart No. 5.

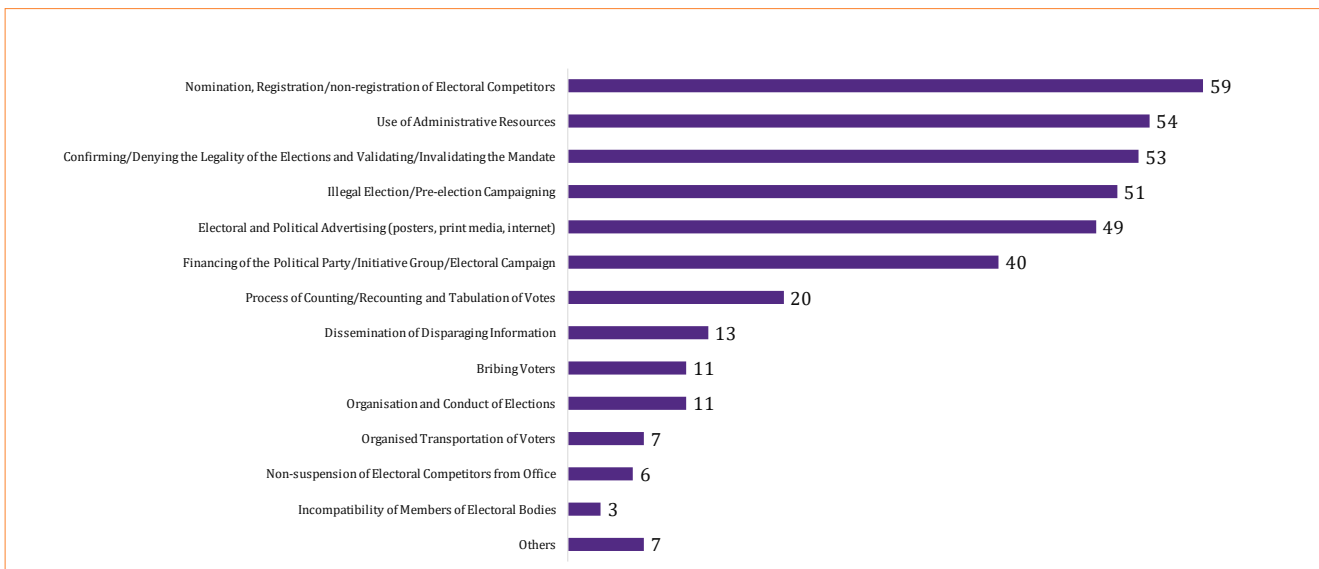
Complainants



The complaints lodged with the CEC mainly concerned the nomination, registration/non-registration of electoral competitors, misuse of administrative resources, confirming/annulling the legality of elections, conducting electoral/pre-electoral campaigning in violation of legal provisions and issues regarding electoral or political advertising (Chart No. 6).

Chart No. 6.

Topic of Complaints



We observe that, distinct from previous elections, the confirmation/denial of election legality and the validation/invalidation of mandates emerged as one of the primary focuses of electoral complaints, a trend similarly noted in complaints filed with district electoral councils. This shift was attributable to the transfer of authority to confirm/annul election legality from courts to the electoral bodies that registered the competitors.

At the same time, the issue of misuse of administrative resources also received a higher share of complaints than in previous elections. The reasons for this phenomenon could be the specificity of local elections, which is due to the large number of candidates running for elective office (including mayors running for a new mandate), but also the more precise regulation of the prohibition of the use of administrative resources in the Electoral Code and the Contravention Code, as from 2022.

Upon **reviewing the complaints and notifications**, the Central Election Commission (CEC) approved decisions rejecting complaints in 31 instances and decisions upholding 13 complaints, while also acknowledging 12 notifications. Simultaneously, the CEC ruled at least 39 complaints and requests as inadmissible. The predominant reason was the filing of a complaint by an entity other than those specified in Article 94, paragraphs (1) and (2) of the Election Code, or by an individual lacking the requisite authority (following the cancellation of the registration of the PŞ candidates). Additional grounds for the complaints' inadmissibility included the submission beyond the three-day deadline (in 3 cases) and the absence of substantiated arguments concerning the infringement of the complainant's rights (in one case).

At the same time, the CEC submitted at least 117 complaints and notifications (32% of the total number of complaints and notifications submitted) for examination under its competence and returned 86 complaints and notifications to the complainants (23% of the total number of complaints and notifications submitted). For the remaining objections and complaints, the CEC either provided a response other than those *mentioned above* (27 cases) or did not publish a response (37 cases).

The high rate of notifications and complaints being returned or forwarded to other authorities (55%) indicates, firstly, a lack of understanding among complainants regarding the appropriate jurisdiction for resolving complains and, secondly, a diminished trust in the capabilities of lower-level electoral bodies or other state authorities. Furthermore, the failure of the CEC to address complaints and notifications initially passed on by police or subordinate electoral entities also contributes to the frequent return and redirection of grievances. In light of this, we recommend the development of a guideline for electoral competitors that clarifies the specific authority responsible for complaint resolution, detailing the procedures for compliance and other prerequisites for complaint admissibility. Additionally, it is imperative to offer comprehensive training to election officials on how to assess and resolve complains, especially concerning local elections.

We would like to highlight that in the timeframe from October 30 to November 15, 2023, the CEC failed to disclose its incoming and outgoing correspondence. This includes notifications and complaints that were not registered as such, along with the responses to them. Such an oversight resulted in diminished transparency of the electoral process.

Regarding the compliance with the **deadlines for complaints consideration**, it is observed that 187 complaints were addressed or responded to within the mandated three-day period as stipulated by Article 100, para. (1) of the Electoral Code. Concurrently, 50 appeals were resolved within 4-5 days, suggesting that in these instances, the deadline may have been extended by no more than two days, in accordance with Article 100, para. (9) of the Electoral Code.

However, 84 complaints were resolved in a timeframe of 6-32 days, of which only 16 related to political party/electoral campaign funding. Given the exemption of political party/electoral campaign financing appeals from the time constraints set forth in the Electoral

Code, it is deduced that for at least 68 complaints, the examination and resolution periods were not adhered to. Additional observed deviations from the prescribed time limits include:

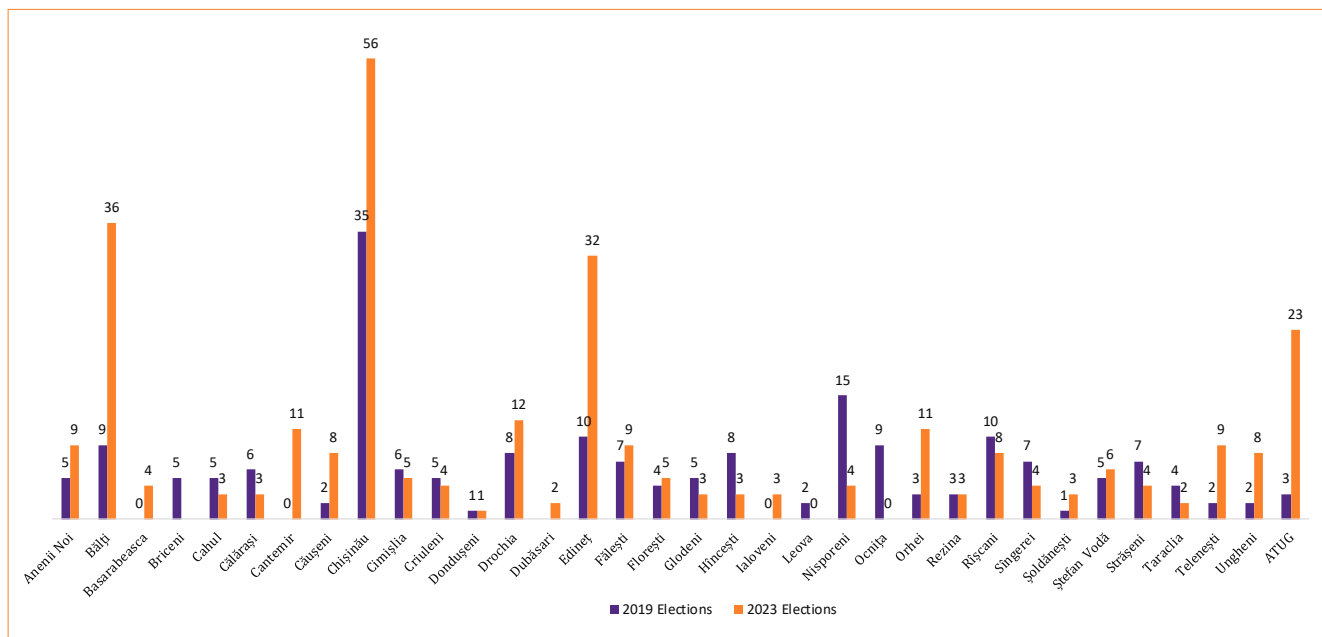
- a) in violation of Article 97, paragraph (3) of the Electoral Code, for 20 complaints, the maximum two-day timeframe, remitting for the complaint for examination to the authority with direct competence over the matter, was surpassed by 1-20 days;
- b) in violation to the stipulation that complaints must be addressed no later than Election Day, at least four complaints submitted before November 5 were processed after this date;
- c) in violation of Article 100, paragraph (4) of the Electoral Code, 15 complaints lodged on Election Day were resolved within 1-3 days, rather than on the day itself.

4.1.2. Complaints Logged with DEC II

According to Promo-LEX observers, 294 complaints were lodged in DEC II, about 51% more than in the 2019 local elections. Most complaints were submitted at the DEC Chisinau - 56, Balti - 36, Edinet - 32, ATUG - 23.

Chart No. 7

Complaints lodged under the DEC II



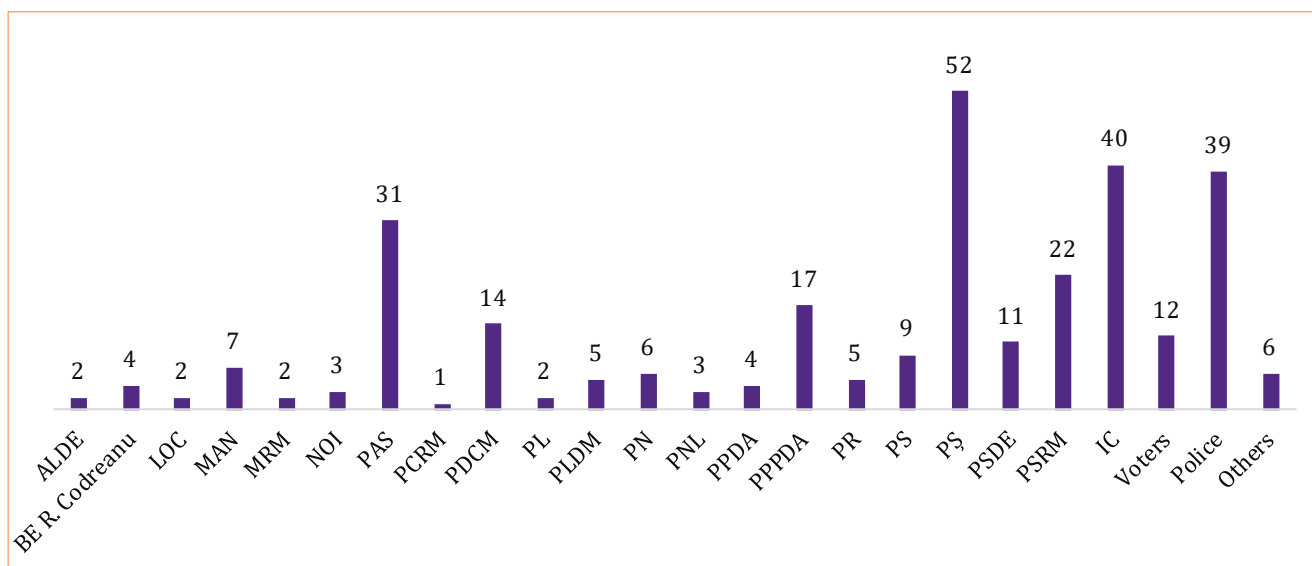
The notable rise in the volume of complaints can be attributed both to the increased number of political parties nominating candidates in the elections and to modifications in electoral legislation concerning the admissibility of complaints and the jurisdiction for their resolution. Thus, while in 2019 the Electoral Code did not include notifications in the notion of complaints, and only voters and electoral competitors could be the competitors, in 2023, a complaint means a request (notification) in written form, including the preliminary request, and the list of subjects entitled to file complaints has been extended to the nominated candidate, the initiative group and the political parties entitled to participate in the elections. Also, in 2019, the actions/inactions of electoral competitors were challenged directly in court, whereas in 2023, they are initially addressed to the electoral body that registered the concerned parties, and thereafter to the superior hierarchical authority. Consequently, the responsibility of district electoral councils to examine and adjudicate complaints saw a significant increase in local elections.

Promo-LEX observers identified deficiencies in the recording practices for complaints, including:

- a) the use of an electronic register (Word document) lacking security features or completed in a format other than that stipulated in Annex No. 1 of the *Regulation on the Procedure for Complaints Consideration during the Electoral Period*;
- b) delays in updating the register, either by not entering complaints or issued decisions on the day they were made or received;
- c) omissions in register the complaints and requests regarding electoral violations in the designated complaints register;
- d) instances of the complaints register being unavailable during observers' visits, often because it had been submitted to higher electoral authorities along with other election-related documents, after the Election Day, etc.

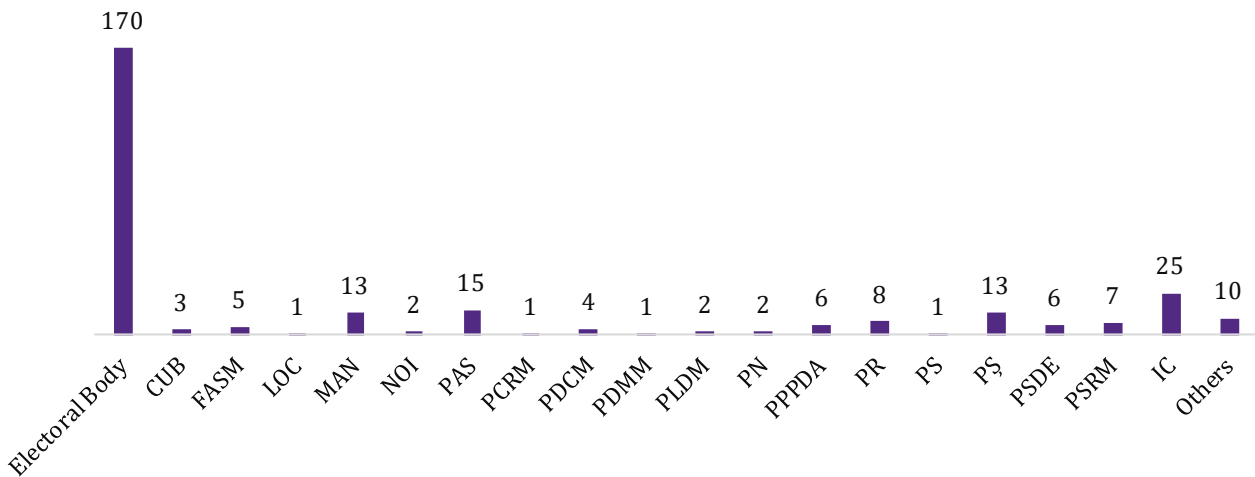
Regarding the **subjects who lodged complaints**, it was noted that 202 complaints were submitted by candidates nominated by political parties, 40 by independent candidates, 39 complaints by the police, 12 by voters, with the remaining submitted by other subjects of the electoral process (see Chart No. 8).

Chart No. 8
Complaints



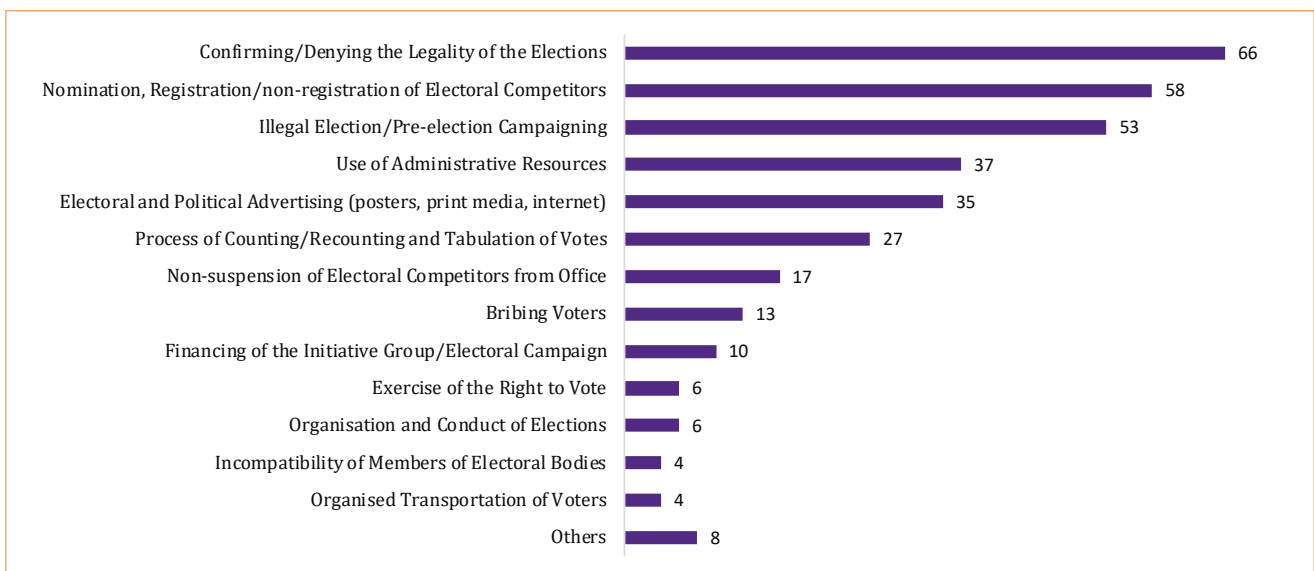
The majority of complaints targeted the actions/inactions and decisions of electoral bodies (170) and political parties along with their nominated candidates (90). Additionally, 25 complaints were lodged against the actions/inactions of independent candidates (see Chart No. 9).

Chart No. 9
Complainants



In contrast to the 2019 local elections, where the court was responsible for confirming or denying the legality of the elections and thus was not subject to contestation within the electoral bodies, the 2023 elections saw this competence shift to the electoral bodies. Consequently, the process of confirming or denying the legality of the elections became the most challenged aspect. Specifically, the complaints submitted to the second level District Electoral Councils (DECs) predominantly addressed the confirmation/denial of the election legality (66 cases), the registration/non-registration of electoral competitors (58 cases), violations in the conduct of the electoral campaign (53 cases), and the use of administrative resources (37 cases).

Chart No. 10
Topic of Complaints



As for the **solutions adopted therein**, the DEC II declared complaints inadmissible in at least 82 cases, rejected complaints in at least 56 cases, upheld complaints in at least 54 cases, remitted for examination to the authority with direct competence over the matter in at least 46 cases and returned complaints in at least two cases. We see in this local election a considerable increase in the number of complaints declared inadmissible by DEC II, compared to the 2019 local elections, when DEC II did not issue such decisions.⁶¹

The most common ground for inadmissibility cited by DEC II (in 45 cases, or 54%) was based on Article 93 para. (2), letter a), stating that a complaint is inadmissible if filed by a subject other than those mentioned in Article 94, para. (1) and (2), or by an unauthorized person. Additional grounds for inadmissibility cited in DEC II's decisions on complaints encompass:

- the procedure for considering the preliminary request was not followed (art. 93, para. (2), letter b)) – in at least **four** cases;
- the complaint was submitted after the expiry of the deadline laid down in Electoral Code (art. 93, para. (2), letter c)) – in at least **nine** cases;
- the complaint does not meet the requirements for form and content, including due to the lack of evidence (art. 93, para. (2), letter d)) – in at least **seven** cases. It is worth mentioning that DEC II's decisions did not clarify in every case whether the complainant had been given the opportunity to rectify the deficiencies, as the law requires, and in at least two instances, complainants noted that the electoral body did not provide them with an address for rectifying these shortcomings.⁶² Moreover, complaints were declared inadmissible even without an affidavit verifying the legal provenance of the evidence. Contrary to DEC II's interpretation of the lack of an affidavit, the CEC, in one case,⁶³ observed that the provision in paragraph 22 of the *Regulation on the Procedure for Complaints Consideration during the Electoral Period* refers to the presentation of evidence in the public meeting of the electoral body, and not at the stage of examining and drafting the decision on the complaint. The complainant affixed their signature attesting to the evidence's authenticity. Therefore, harmonizing the practice of interpreting conditions that could determine a complaint's inadmissibility would be advisable;
- the complainant cannot claim the violation of their electoral rights (art. 93, para. (2), letter e)) – in at least **five** cases;
- the complaint was lodged simultaneously with another electoral body (art. 93, para. (2), letter g)) – in at least **three** cases.

At the same time, it's observed that certain DEC II have declared the complaints inadmissible on grounds other than those exhaustively set out in the Electoral Code. Notably, the argument that administrative actions can only be challenged concurrently with the individual administrative act, and the rationale that the complainant failed to substantiate any of the grounds specified in the Electoral Code for complaints lodged after voting day, with reference to Article 91, para. (1), letter (b) of the Electoral Code. (9)⁶⁴.

Taking into account the large number of complaints deemed inadmissible, along with the principle of simplicity and informality in the appeal procedure, in particular with regard to the admissibility of complaints, outlined in the Code of Good Practice in Electoral Matters, a revision of the inadmissibility grounds is recommended to omit formal criteria that preclude examination of the complaint's substance. Concurrently, training for election officials on this matter is advisable.

61 According to Promo-LEX's observations, in the 2019 local elections, the DEC II adopted decisions rejecting complaints in at least 72 cases, remitted complaints for examination to the authority with direct competence over the matter in at least 32 cases, upheld complaints in at least 23 cases and returned complaints in at least 21 cases.

62 [Complaint](#) submitted by M. Brenici on 12.11.2023 to CEC; [Complaint](#) submitted by V. Alexandru on 11.11.2023 to CEC.

63 [CEC Decision](#) CEC Decision No. 1588 of 17.11.2023 on the Complaint No. CEC-7/8655 of 24.10.2023 submitted by PAS.

64 Post-voting day complaints may relate to violations concerning the exercise of the right to vote, the organization of voting procedures on voting day and/or the determination of voting results by the electoral bodies, as well as other violations whereby the rights of the complainants were violated and the voting results were influenced.

Regarding compliance with **deadlines for complaints consideration**, it's observed that at least 27 complaints were addressed or responded to on the day of submission, with only 12 of these being filed on Election Day. Furthermore, at least 60 complaints were resolved within one day, approximately 48 complaints within two days, 72 within three days, 16 within four days, seven within five days, five within six days, five within seven days, and one complaint within eight days.

It's noted that the second-level electoral bodies have breached the time limits specified by the Electoral Code for processing for several complaints, specifically:

- in violation to Art. 97 para. (3) of the Electoral Code, in the case of six challenges, the two-day deadline for remitting the complaint for examination to the authority with direct competence over the matter was not met;
- in violation to Art. 100, para. (1) of the Election Code, at least 14 complaints were addressed later than Election Day, although they had been submitted by Election Day;
- in violation to Art. 100, para. (1) and (9), at least six complaints lodged by Election Day were resolved in over 5 days, going beyond the prescribed time limit.

4.1.3. Complaints logged with DEC I

According to Promo-LEX EOM observers, at least **83 complaints** were submitted to the DEC I level, most of them being registered at DEC I in Edinet district (17); followed by mun. Chisinau (7), Riscani district (6) and Singerei district (6).

As regards the **subjects lodging complaints**, 66 complaints were filed by candidates nominated by political parties, 11 by independent candidates, and six by voters (see Chart No.11).

Most of the complaints were filed against the actions of political parties and candidates nominated by them (49) and against the actions/inactions and decisions of electoral bodies and their members (29). Five complaints were filed against the actions of independent candidates.

Chart No. 11
Complaints

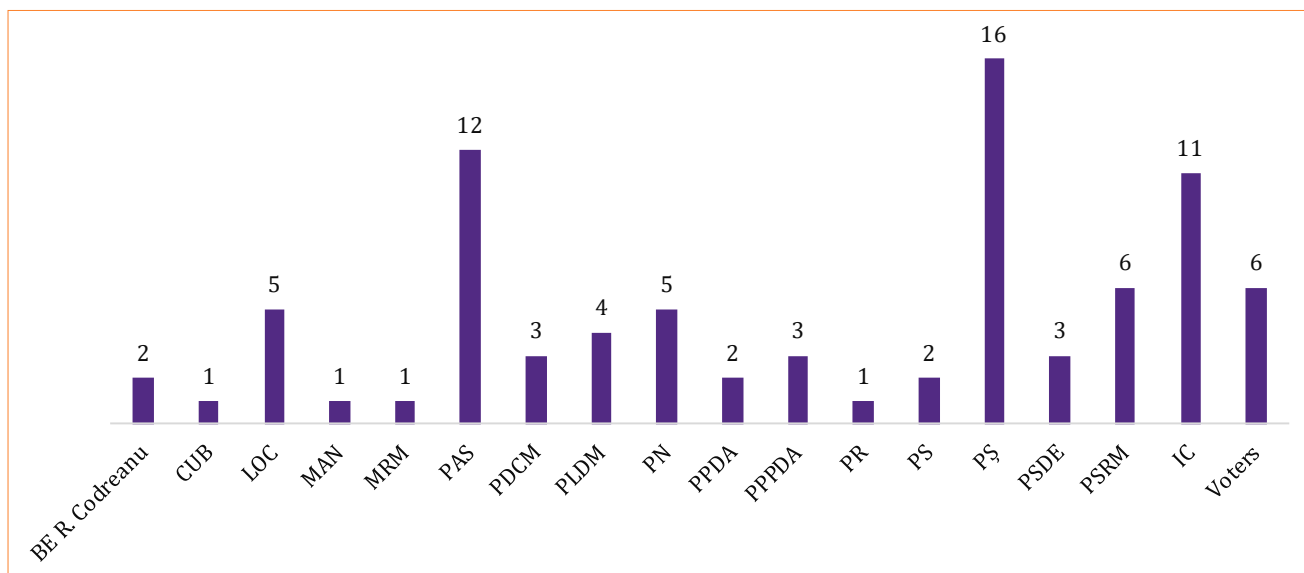
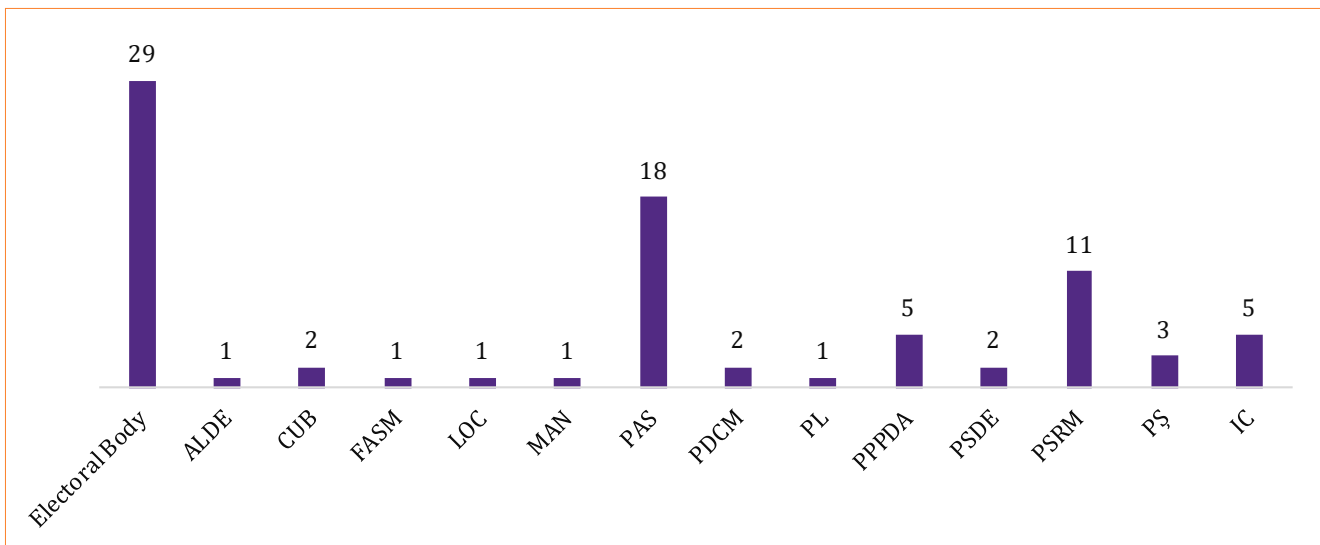


Chart No. 12

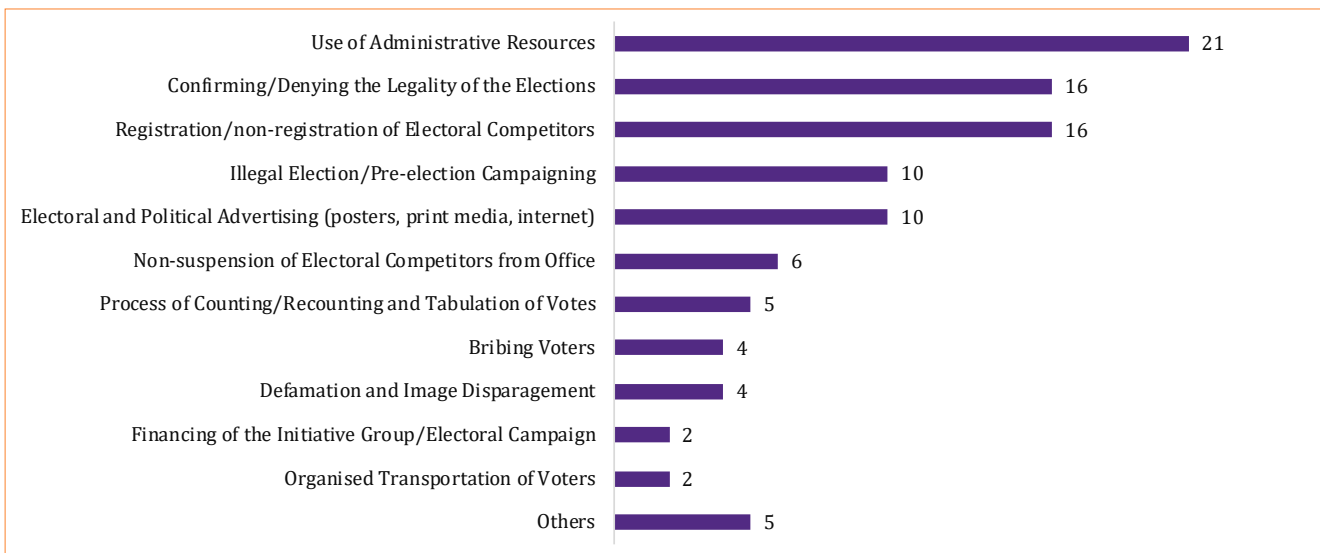
Complainants



The complaints lodged in DEC I mainly targeted the use of administrative resources (21), confirmation/denial of the legality of elections (16), registration/non-registration of electoral competitors (16), electoral/pre-electoral campaigning in violation of legal provisions (10). In this regard, we note that both DEC II and DEC I most frequently invoked the same issues of complaints.

Chart No. 13

Topic of Complaints



Regarding the **solutions adopted therein**, DEC I deemed complaints inadmissible in at least 30 instances, rejected complaints in at least 16 instances, partially or fully upheld complaints in at least 10 instances, remitted complaints for examination to the authority with direct competence over the matter in at least 15 instances, and returned complaints in at least two instances. Notably, in certain situations, DEC I did not render decisions after reviewing the complaints but instead issued a notification or letter to inform the complainant about the measures taken by DEC I or about the unfeasibility of intervening.

The observations and conclusions about the significant number of inadmissible complaints, similar to those noted for DEC II, also pertain to DEC I in comparison to previous local elections I.

The most common ground for inadmissibility cited by DEC I (in 16 cases, or 53%) was based on Article 93 para. (2), letter a), stating that a complaint is inadmissible if filed by a subject other than those mentioned in Article 94, para. (1) and (2), or by an unauthorized person. Additional grounds for inadmissibility cited in DEC I's decisions on complaints encompass:

- the complaint was submitted after the expiry of the deadline laid down in Electoral Code (art. 93, para. (2), letter c)) – in at least **one** case;
- the complaint does not meet the requirements for form and content, including due to the lack of evidence (art. 93, para. (2), letter d)) – in at least **seven** cases. It is worth mentioning that DEC I's decisions did not clarify in every case whether the complainant had been given the opportunity to rectify the deficiencies, as the law requires. A notable case involved a complaint lodged by Sergiu Stanciu against DEC 25/1 Orhei, where he reported that he was not allotted any opportunity to address the identified deficiencies and submitted an Affidavit on the legal provenance of evidence⁶⁵;
- the complainant cannot claim the violation of their electoral rights (art. 93, para. (2), letter e)) – in at least **one** case;

Regarding compliance with **deadlines for complaints consideration**, it's observed that at least six complaints were addressed or responded to on the day of submission, with only one of these being filed on Election Day. Furthermore, at least 18 complaints were resolved within one day, approximately 22 complaints within two days, 18 within three days, three within four days, one within five days, one within six days. It's also highlighted that, in at least one instance, the requirement set by Art. 97 para. (3) of the Electoral Code, which mandates a two-day timeframe for remitting the complaint for examination to the authority with direct competence over the matter, was not met.

4.1.4. Qualitative Analysis of Complaints and Their Resolutions in General Local Elections

a) Quality of the examination of complaints and notifications

Following the qualitative analysis of the complaints, Promo-LEX EOM found that in at least one case, the CEC, examining the response of the DEC of Mileștii Mici No. 21/12 to a complaint regarding alleged violations of the legislation on the use of administrative resources⁶⁶, drew the attention of the President of the DEC 21/12 to the fact that the complaints (notifications) are examined in accordance with the provisions of the Electoral Code and the Administrative Code, as well as the *Regulation on the Procedure for Complaints Consideration during the Electoral Period*. Thus, the CEC emphasized the necessity to comply with the regulatory framework and procedures, i.e. to adopt a solution based on documents and explanations of the parties.

Promo-LEX observers noted at least 15 instances⁶⁷ where the decisions on complaints didn't follow the required decision structure outlined in paragraph 15 of the *Regulation on the Procedure for Complaints Consideration during the Electoral Period*. Specifically, these

65 [Complaint](#) from 15.11.2023, submitted by Sergiu Stanciu against DEC 25/1 Orhei.

66 CEC [Letter](#) No. 3490 from 31.10.2023.

67 Decision No. 28/2 from 20.11.2023 of the DEC 4 Anenii Noi; Decision No. 30 from 03.11.2023 of DEC 4/21 Speia; Decision No. 23 from 15.10.2023 of DEC 12/8 Cruglic; Decision No. 1 from 08.11.2023 of DEC 16/22 Lopatnic; Decision No. 10 from 06.10.2023 of DEC 18/37 Vărvăreuca; Decision No. 23 from 18.10.2023 of DEC 20/2 Bălceana; Decision No. 1 from 29.10.2023 of CECE 21/5 Costești; Decision No. 1 from 14.10.2023 of DEC 23/21 Vărzărești; Decision No. 22, 23, 24 from 19.10.2023 of DEC 28/6 Bilicenii Vechi; Decision No. 8/1 from 18.10.2023, nr. 9/1 of 25/10/2023, nr. 11/1 from 27.10.2023 of DEC 29/17 Parcani; Decision No. 22 from 14.10.2023 of DEC 30/16 Pânășești.

deficiencies were observed in the decisions of first-level electoral councils, which lacked:

- a) description (facts invoked in the complaint by the complaining party and the defendant's position) – 12 cases;
- b) motivation (facts established by the electoral body based on the attached evidence, the legal grounds that the electoral body relied on) – 15 cases;
- c) Enacting (conclusion of the electoral body regarding the full or partial acceptance; full or partial rejection) – 3 cases⁶⁸.

In this context, we recommend the enhanced training of election officials for the effective consideration and resolution of complaints, especially during local elections. Furthermore, it may be beneficial to reassess the assignment of complaint resolution duties from DEC I to DEC II.

Additionally, it is important to note that despite the Electoral Code not assigning the PEB with the authority to resolve complaints, instances were noted where complaints were erroneously directed to them. For example, complaints submitted to CEC regarding the activity of the President and Secretary of PEB No. 7/7 Albinețul Vechi, Falesti, were inappropriately remitted for the examination to the PEB for resolution⁶⁹. This practice not only contravenes the legal framework but also improperly positions the PEB to judge alleged misconduct among its members. Moreover, remitting complaints⁷⁰ regarding the actions of DEC chairpersons to the same DEC for review contradicts Article 91 para. (3) of the Electoral Code, compromising the integrity of the complaint resolution process.

b) Legal Status of the Complainants

In at least two instances at the CEC⁷¹ and eleven instances at the constituency electoral councils, complaints were submitted by the presidents of territorial organizations (TO) or political bodies of political parties. It's important to note that, according to Art. 94 para. (1) of the Electoral Code, those entitled to submit a complaint include voters, nominated candidates, initiative groups, electoral blocs, electoral competitors who allege a violation of their legitimate rights as defined by the Code and other regulatory acts in the electoral domain. Additionally, political parties eligible to partake in elections are also entitled to lodge complaints.

It should be noted that in previous elections, challenges filed by representatives of territorial organizations of political parties were declared inadmissible because they were filed by unauthorized persons. In contrast to previous practice, in this election the electoral bodies examined these complaints. Moreover, the CEC considered, in one case⁷², that the complaint signed by the President of the Permanent Bureau of the territorial organization was submitted by an authorized person, pursuant to Art. 2, para. (1), Art. 14 para. (1) and (3) of the Law on Political Parties and the statutory provisions according to which the President of the TO represents the party at the territorial level, and the complaint concerned alleged unlawful acts committed in the respective ATU.

Promo-LEX EOM emphasizes that the procedure for submitting and determining the admissibility of complaints should avoid unnecessary formalities⁷³. Nevertheless, without a specific status conferred by the electoral body to election participants (such as candidates, initiative groups, or their representatives), identifying who is authorized to submit

68 Decision No. 30 from 03.11.2023 of DEC 4/21 Speia; Decision No. 10 from 06.10.2023 of DEC 18/37 Vărvăreuca; Decision No. 1 from 14.10.2023 of DEC 23/21 Vărzărești.

69 CEC [Letter](#) No. 8/3790 from 18.11.2023.

70 CEC [Letter](#) No. 8/3634 from 07.11.2023.

71 Complaints to the CEC: Permanent Bureau of TO PAS Anenii Noi vs PSRM; Pulisca M. - president of TO PAS Vatra vs MAN.

72 CEC [Decision](#) No. 1588 from 17.11.2023 regarding the complaint No. CEC-7/8655 from 24 October 2023 submitted by PAS.

73 Point 3.3, letter (b) of the [Code of Good Practice](#) in Electoral Matters: "The appeals procedure should be simple and informal, in particular with regard to determining the admissibility of complaints".

complaints can be challenging. For instance, based on the CEC's interpretation regarding political parties, it is conceivable that not only the president of the territorial organization (TO) but also the TO's vice-president, the president and vice-president of the party's local organization, and individuals they authorize through power of attorney could be recognized as legitimate complainants. However, verifying whether someone has been appointed as the chair of the territorial organization can be problematic, as electoral bodies may not have updated information on changes within the political party's structure.

Promo-LEX EOM recommends further examination of this issue and, if deemed necessary, to regulate the list of individuals authorized to represent political parties in elections and the required supporting documents. This regulation should be incorporated into the *Regulation on the Procedure for Complaints Consideration during the Electoral Period*.

c) *The status of complainant of the "CHANCE" Party (PȘ), after the cancellation of the registration of candidates nominated by the political party*

District electoral councils declared at least 59 complaints inadmissible, and the Central Electoral Commission (CEC) declared 35 inadmissible, on the grounds that they were filed by "subjects who are not entitled to file electoral complaints." These were specifically from PȘ candidates whose registration was cancelled just two days prior to election day. The complaints primarily sought to challenge the legality of the elections, arguing that the cancellation of their registration was unlawful. Furthermore, the central dispute filed by the PȘ on November 4 against the Commission for Emergency Situations, regarding the annulment of the registration of candidates nominated by the party, had not reached a final and irrevocable decision by early February 2024.

The electoral authorities encountered a significant volume of complaints challenging the legality of the CES provision, alongside the task to conclude on the overall legality of the election. This was compounded by the absence of a final and irrevocable court decision regarding the lawfulness of the cancellation of the registration of numerous candidates.

The electoral bodies proceeded with the examination of these complaints without awaiting the issuance of a final and irrevocable decision on the CES Provision. They determined that the complainants, not being entitled to lodge complaints in electoral matters, consequently had no infringed rights to claim. Courts additionally noted that following the annulment of all candidates from the "CHANCE" political party for the 5 November 2023 general local elections, the party lost its status as an electoral competitor. This loss of status was irreversible due to the expiration of the legal deadline for candidate registration, thereby barring the party from participating in the elections. Thus, without electoral competitor status, the party could not allege violations of electoral rights, including in the electoral administrative procedure, leading to the inadmissibility of the claims.⁷⁴ Promo-LEX EOM emphasized that the dispute regarding the legality of the CES Provision No. 92 of 3 November 2023 needed resolution within the narrow timeframes dictated by the Electoral Code.⁷⁵

In view of the *above-mentioned*, we recommend revising the practice of confirming/denying the legality of elections in order to comply with the condition laid down in Art. 174, para. (2) of the Electoral Code, i.e. **confirming or denying the legality of the elections not before the electoral bodies or the Courts have made final decisions on complaints submitted according to the established procedures**. Consideration could also be given to the appropriateness of including a condition for suspending the resolution of complaints

74 SCJ [Conclusion](#) from 19.11.2023 in the case of PȘ vs CECER Anenii Noi No. 4; SCJ [Conclusion](#) from 19.11.2023 in the case of PȘ vs DEC Glodeni No. 19; SCJ [Decision](#) from 19.11.2023 in the case of PȘ vs DEC Sângerei No. 28; SCJ [Conclusion](#) from 19.11.2023 in the case of PȘ vs DEC Râșcani No. 27; SCJ [Conclusion](#) from 19.11.2023 in the case of PȘ vs DEC Drochia No. 14; SCJ [Conclusion](#) from 19.11.2023 in the case PȘ vs DEC Dondușeni No. 13.

75 [Report No. 5](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 10-11.

if the acts/actions/inactions invoked in the complaints are the subject of another dispute under examination.

d) Involvement and Incompatibility of PEB and DEC members in election campaigning activities

Art. 42, para. (1) of the Electoral Code states that members of electoral councils and bureaus may not engage in any activity as another subject involved in the electoral process; may not make statements or campaigning in favor of or against electoral competitors; may not engage in political activities in support of any of the electoral competitors; may not support, either financially or by any other means, directly or indirectly, any electoral competitor. In local elections, members of electoral councils and electoral offices are prohibited from being the spouse, related by affinity, or a first-degree relative of any candidate standing as a candidate in the constituency within the territorial district of the electoral body to which they belong.

At least 14 complaints were submitted regarding the involvement of electoral body members (DEC, PEB) in campaigning activities for or against specific candidates. This contrasts with the 2019 elections when such complaints were typically rejected. In the 2023 elections, the majority of these complaints (10) were sustained, leading to various sanctions being imposed:

- in two cases, the first-level constituency electoral councils reviewed these complaints independently, despite being about one or more of their own members. In one situation, the chairwoman of DEC 6/14 received a warning for the inadmissibility of the infringement and was instructed to remove any posts favoring or opposing a candidate. In another case, a member of DEC 31/1 was issued a warning.
- In eight cases, DEC II opted to issue warnings to the DEC 18/27 President, a member of DEC 5/5, and the DEC 17/7 Secretary, and went as far as to dismiss two DEC members and the DEC 14/10 Secretary.

Furthermore, at least seven complaints were filed alleging conflicts due to the incompatibility of PEB/DEC members. These incompatibilities stemmed from their relationships by kinship or affinity with candidates and/or holding a position of public dignity concurrently with their role in the electoral body. The handling of these complaints varied, with the majority being referred for examination under the relevant jurisdiction (4 cases), rejected (1 case), declared inadmissible (1 case), or resolved through a different method than rejection or admission. In some instances, members of the electoral bodies implicated by these family or affinity conflicts ceased their involvement in the electoral process, either by resigning (such as the chairwoman of DEC 36/3 in Vulcanesti) or being revoked from their positions, which led to changes in the composition of the electoral bodies (e.g., a member of DEC 1/12).

We highlight the issue that individuals designated to serve as interim mayors (during the suspension of the mayoral candidates' activities) should not concurrently hold positions within electoral bodies. This concern arises from observations in at least two instances:

- a member of the DEC 26/5 Cuizăuca (who also undertook the responsibilities of the PEB as per Article 158 of the Electoral Code), concurrently held the role of acting mayor for the village of Cuizăuca, Rezina district⁷⁶;
- the President of DEC 1/5 Vadul lui Voda, who additionally fulfilled the duties of acting mayor for the town of Vadul lui Voda.⁷⁷

⁷⁶ Complaint from 29.10.2023 submitted to the DEC 26 Rezina by S. Cojocari (IC).

⁷⁷ Complaint from 10.11.2023 lodged with DEC 1 Chişinău by E. Cebotari (BE R. Codreanu).

This recommendation concerning the incompatibility of roles is supported by the procedure through which a mayor entrusts the exercise of mayoral duties “under his own responsibility” to a deputy mayor or, where applicable, to the council secretary, as per Article 34, paragraph (3) of Law no. 436 dated 28.12.2006. Furthermore, the appointment process of the deputy mayor, which is based on the mayor’s recommendation, underscores the potential conflict. The trust relationship between an incumbent mayor seeking re-election and the deputy mayor or secretary, to whom duties are delegated, is likely to conflict with the restrictions specified in Article 42 of the Electoral Code. These restrictions mandate that members of the council and electoral bureau refrain from making statements or engaging in activities favoring or opposing electoral competitors, as well as from providing financial or any other form of direct or indirect support to any electoral competitor.

Therefore, we suggest that CEC reviews the suitability of incorporating proposed amendments into the regulatory framework. Additionally, it may be prudent to supplement Article 42, paragraph (1) of the Electoral Code with an additional prohibition explicitly stating that individuals “shall not be entitled to act as interim mayor”.

e) Registration/non-registration of Electoral Competitors

For the first time in local elections, a requirement was introduced for mayoral candidates to have completed compulsory general education. This requirement led to a notable increase in complaints by electoral candidates. Specifically, at least 14 disputes revolved around either the absence of an education certificate in a candidate’s registration dossier or allegations of such certificates being falsified. Of these, only one complaint was upheld by the electoral authorities (DEC 27/21 in Recea, Râșcani), resulting in the annulment of the candidate’s registration. In the remaining instances, the electoral bodies deemed the challenges inadmissible, citing reasons such as the expiration of the deadline for filing complaints, or remitting the cases examination to the authority with direct competence over the matter, or rejecting the complaints.

However, in the specific case of the mayoral candidate for com. Bubuieci, L. Umaneț, the absence of an educational certificate led to the conclusion of the courts on the illegality of the decision to register the candidate. Correspondingly, the Bubuieci DEC revoked its decision to register the candidate in question on 27.12.2023. This action was taken after the election had concluded and the results were announced, which had initially indicated L. Umaneț as the winning candidate for mayor.

In this regard, we draw attention to the fact that that the legislation, specifically Article 161, paragraph (2), prescribes certain mandatory prerequisites for mayoral candidates, one of which is the attainment of compulsory general education. Moreover, the documentation required under Article 68, paragraph (1)—including a copy of the educational diploma—serves merely to verify compliance with these prerequisites. Consequently, the Promo-LEX EOM advocates for the verification of these documents, to ascertain compliance with the statutory requirements, should occur during the review of the candidate’s registration dossier. This process should precede the election to ensure that the electorate’s vote is cast for candidates duly vetted by the electoral bodies, rather than addressing these concerns post-election.

In another vein, it’s worth noting that there have been at least 21 complaints lodged against candidates for whom the National Integrity Authority (ANI) has issued findings and ordered the revocation of their eligibility to hold public office. Most of the complaints were deemed inadmissible or rejected by the electoral bodies. Nonetheless, there were instances⁷⁸, where

78 Țiței Vitalie (Pociumbăuți), Sandu Alexandru (Hiliuți), Ion Berladean (Cotova).

the courts ruled the registration of candidates as unlawful, particularly when there was an existing enforceable court decision validating the ANI's determinations at that time.

Promo-LEX EOM observed that the registration of candidates possessing definitive documents from the National Integrity Authority (ANI) that cite the imposition of sanctions, specifically the deprivation of the right to hold public office, yet who have not been discharged from their positions, has led to numerous electoral disputes. We contend that both the electoral bodies and the ANI ought to adhere to the judicial precedents established in this election cycle to avert similar occurrences in the future.

At the same time, we emphasize that following the elections and the announcement of the elected mayors, some DEC's initiated post-election verifications to ensure the candidates met the qualifications for mayorship, specifically regarding any prohibitions on holding positions of authority. For instance, DEC 10 Căușeni determined that, based on the voting results, Maria Ghelan was elected as the mayor of Căinari. However, a decision by the Supreme Court of Justice exists against her, which upheld the ANI's finding, thus barring her from holding any public functions or positions of dignity for a period of 3 years. Consequently, DEC 10 Căușeni concluded that while Maria Ghelan was not stripped of her eligibility to run for office, the presence of the Supreme Court decision prevents the validation of her mayoral mandate. They requested ANI to make a decision regarding the validation or invalidation of her public dignity mandate.⁷⁹

In light of this, we reiterate that electoral bodies must verify the mandatory qualifications for the mayoral office at the time of candidate registration, not during the later stages of confirming or denying the legality of the election and the validation of the mandate. Failure to do so risks creating a perception among voters that their vote is disregarded.

79 Căușeni DEC 10 [Letter](#) from 13.11.2023.

CHAPTER V

NOMINATION AND REGISTRATION OF COMPETITORS

5.1. Regulation of the Registration Procedure for Competitors

The nomination period begins no earlier than 60 days before Election Day for Level II constituencies and no earlier than 40 days for Level I constituencies. For registration as an electoral competitor, political parties, electoral blocs, and independent candidates must submit the required set of documents to the constituency electoral councils no later than 30 days before Election Day. The candidate lists must comply with the minimum representation quota of 40% for both genders, with at least four candidates for every ten seats.

Additionally, the new Electoral Code continues to require only independent candidates to collect signatures for registration. However, the required number of signatures has been reduced, and voters can now support more than one candidate, a change from the previous rule allowing support for only one candidate. The minimum age for mayoral candidates has been lowered from 25 to 23 years, and a new requirement for general education has been introduced.

5.2. Nomination and Registration of Competitors for the General Local Elections

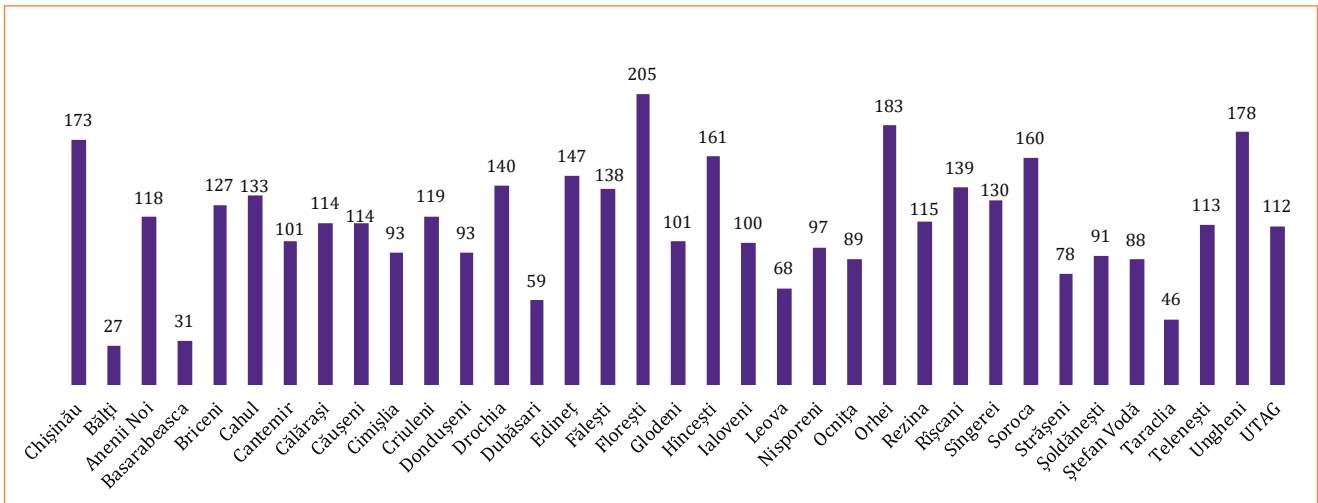
5.2.1. Registration of Mayoral Candidates

According to observers, a total of 3,981 candidates were registered across 898 District Electoral Commissions (DECs) for the position of mayor.⁸⁰ The highest number of candidates were registered in DEC II Floresti with 205 candidates, followed by Orhei with 183, and Ungheni with 178.

80 The information derived from Promo-LEX observers' analysis of primary data published on the CEC website.

Chart No. 14

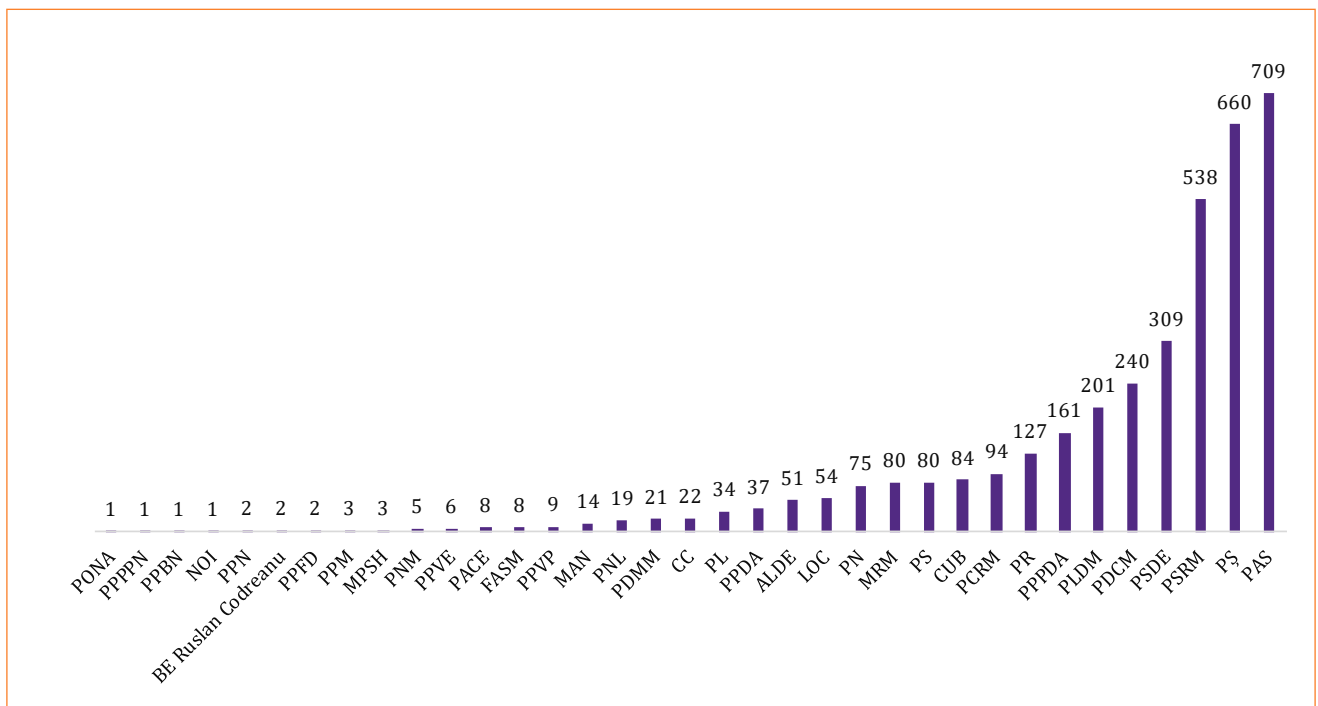
Registered Candidates for the Position of Mayor by Constituency



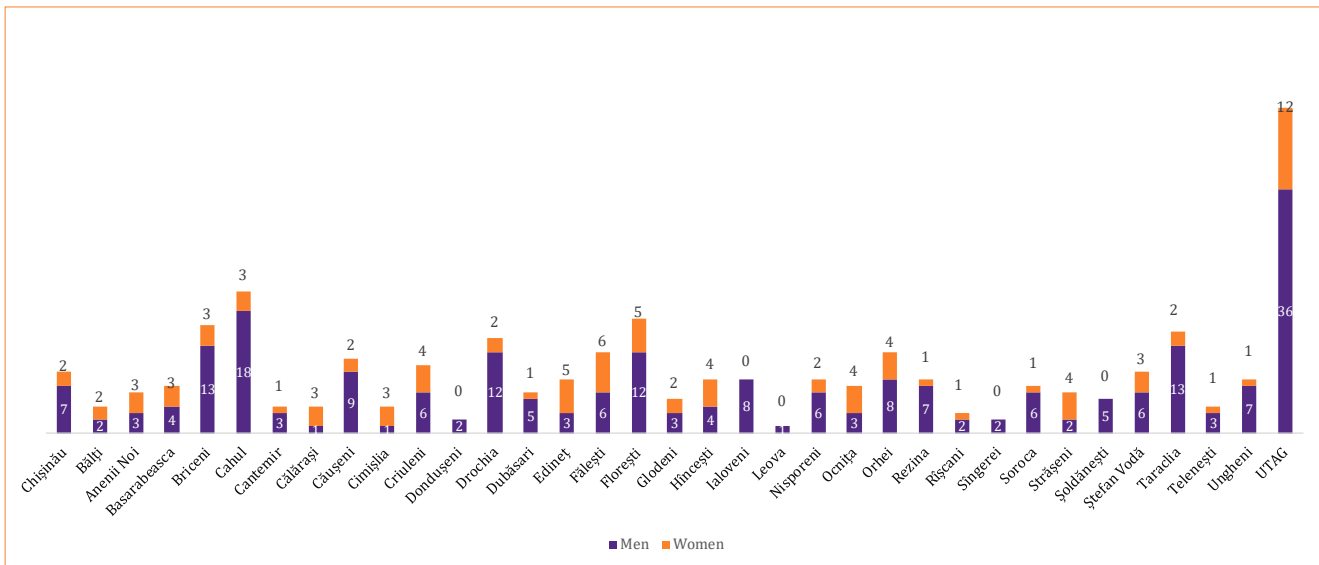
Based on political affiliation, as shown in Chart No. 15, the parties that nominated the most candidates were PAS (709), PȘ (660), and PSRM (538). Only 30% of all registered candidates are women, with 92% of them being nominated by political parties and just 8% standing as independent candidates. This data indicates that women continue to be under-represented among the registered candidates in the elections.

Chart No. 15

Candidates in Line with their Political Affiliation



Out of the 3,981 registered candidates, 319 (8%) ran as independent candidates. The DECs with the most independent candidates were DEC II of TUAG with 48, Cahul with 21, and Falești with 17.



It is important to note that in this election, according to the new Electoral Code provisions, independent candidates for mayor position must be supported by 1% of the voters in the constituency, but no fewer than 100 people. Previously, they had to present signatures from 5% of the voters, but no fewer than 150. Despite these changes, the number of registered independent candidates has decreased. In the 2019 election, 9% of all registered candidates for mayor were independent, compared to only 8% in the 2023 election.

5.2.2. Registration of Councillor Candidates

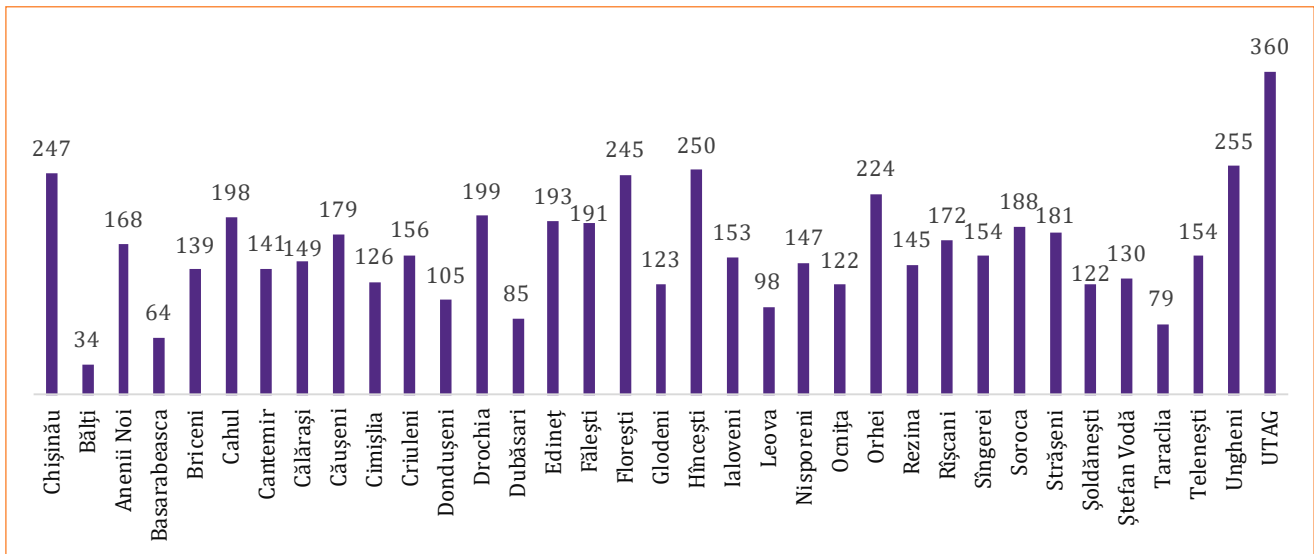
In the 2023 general local elections, there was a continued trend of reducing the number of councillors. Compared to the general local elections of October 20, 2019, the total number of local councillors to be elected decreased by 522.⁸¹ This reduction is significantly more pronounced than the decrease observed between 2015 and 2019, which saw a reduction of approximately 100 seats. The reasons for this reduction include both a continuous decrease in the population within local authority areas and legislative changes. Starting from the 2023 elections, the determination of councillor seats is based on data from the State Population Register (SPR) rather than the National Bureau of Statistics.

In total, 5,676 dossiers (representing more than 56.4 thousand individuals) were registered for the position of councillor across 896 DEC I and 35 DEC II. The highest number of dossiers were registered in TUAG (360), Ungheni district (255), and Hincești district (250).

81 [Report No. 1](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 8.

Chart No. 17

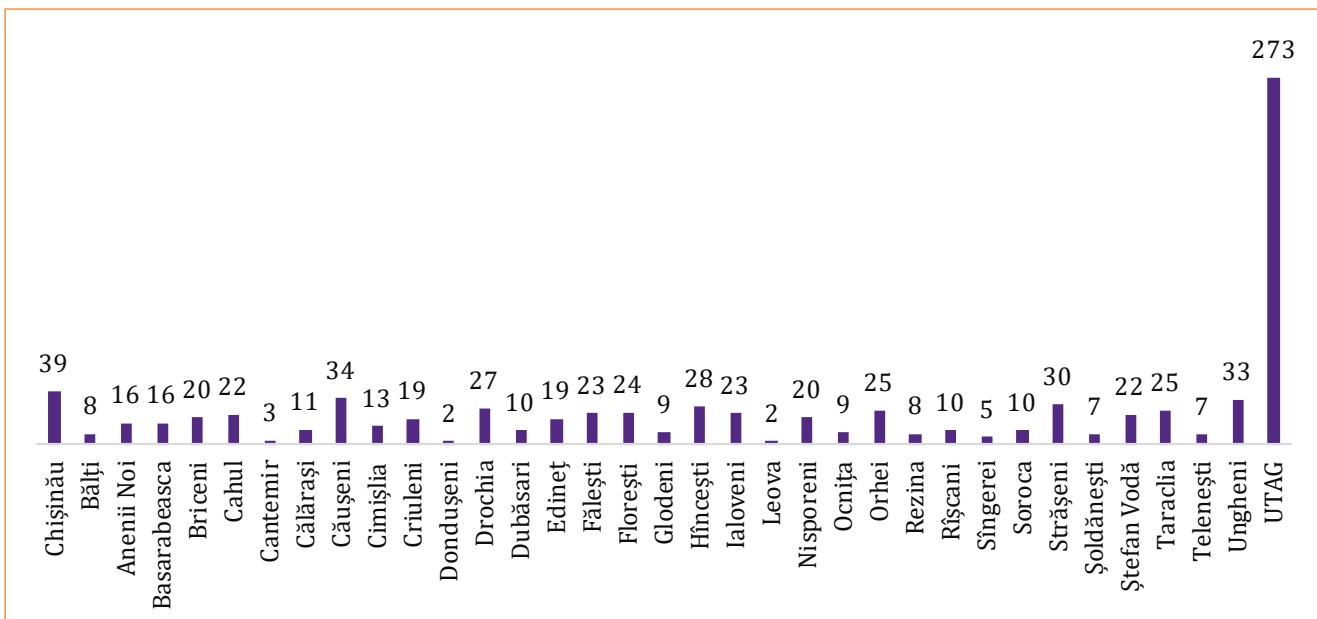
Number of Dossiers Registered per DEC (II and I)



Of the 5,676 dossiers registered, 852 were from independent candidates, as shown in Chart No. 18. The highest numbers of ICs were recorded in TUAG (273), the municipality of Chisinau (39), and Causeni (34). When compared to the 2019 elections, there has been a decrease in the participation of independent candidates for councillor positions, from approximately 19% to 15% for the 2023 general local elections. Of the registered independent candidates, only 171 (20%) were women.

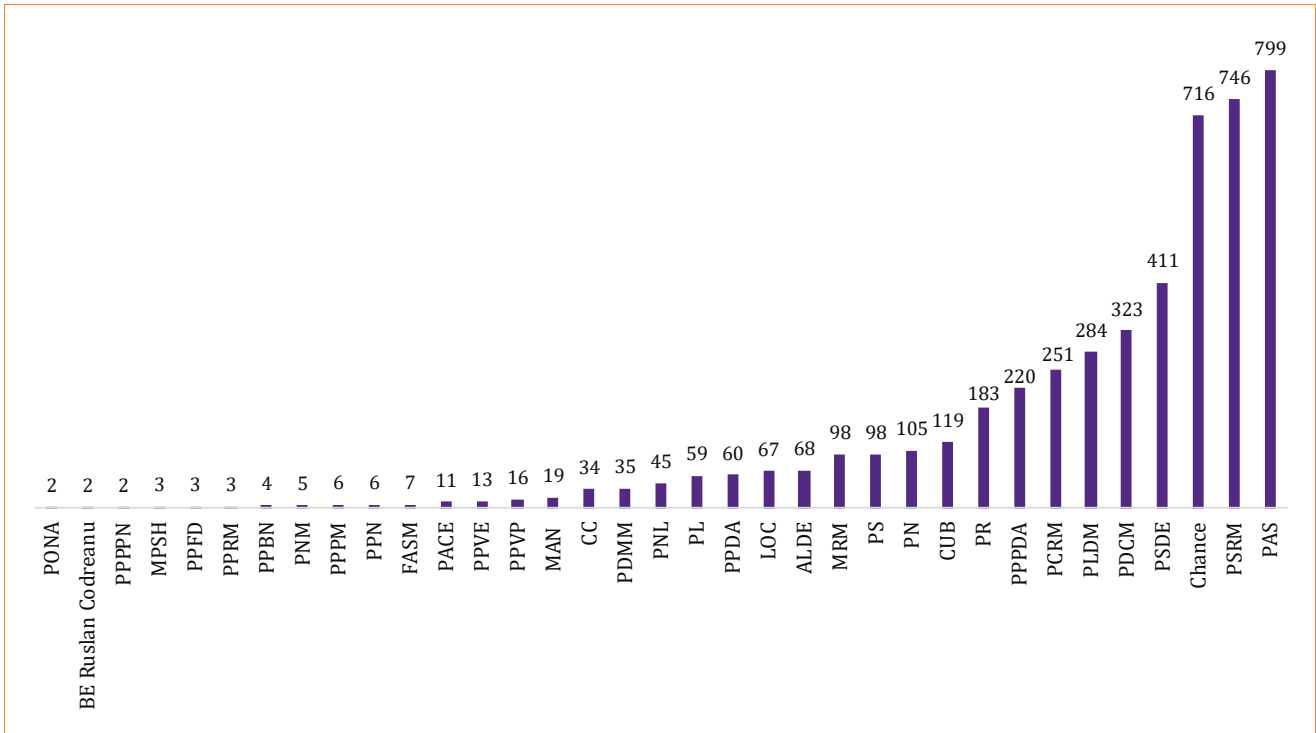
Chart No. 18

Registration of ICs for the Position of Councillor



When examining the data by political party affiliation, the largest numbers of candidate dossiers for the councillor positions were submitted by PAS with 799 files, PSRM with 746 files, and PŞ with 716 files.

Number of Dossiers Registered for the Position of Councilor by Political Party



Adhering to the Principle of Electoral Inclusion in Councillor List Formation. During our mission, we sought feedback from the representatives of electoral competitors regarding their adherence to the principle of electoral inclusion in compiling their candidate lists. This endeavor aimed to gauge the local party leaders’ attitudes towards inclusively forming these lists and to identify any areas needing further informational support.

Regarding the gender quota, representatives noted compliance with this legal mandate. However, some pointed out challenges in meeting the quota, citing a perceived “lack of qualified women in politics” as a barrier. Additionally, there were remarks about receiving delayed notifications concerning the Central Election Commission’s (CEC) circular and the specifics of completing the nomination lists for local elections, necessitating multiple revisions. Concerns were also raised that this requirement might inadvertently encourage the practice of political trawling.

Regarding the inclusion of *young people in their candidate lists*, most interviewees acknowledged they didn’t specifically calculate the proportion of young candidates. However, they emphasized that young individuals were indeed included on their lists, noting that integrating youth tends to be more challenging in rural areas. The issue of *representing ethnic minorities on the lists* was particularly pertinent in polyethnic communities.

The interviews revealed only isolated instances of including *individuals with disabilities* in the council candidate lists. A common rationale was the perceived absence of such individuals in their communities, leading to a lack of emphasis on this aspect of inclusion.

Overall, the selection of candidates was reportedly based on criteria such as professionalism, diversity of professions, experience, and territorial representation, rather than a focused effort on electoral inclusion.

5.2.3. Refusal of Electoral Bodies to Register Nominated Candidates

At least 21 instances of electoral bodies refusing to register nomination dossiers for mayoral candidates were documented. Among these, in 9 cases - IC (insufficient valid signatures in the subscription lists), in 6 cases – PȘ (candidate banned from participating in the elections⁸²), in 3 cases - PSRM and PACE (absence of the candidate's diploma), in 2 cases - PDCM and IC (candidates did not meet the minimum age requirement of 23) and in 1 case - SSP (incomplete dossier).

In the same context, we note that at least 18 cases of refusal of electoral bodies to register candidates nominated for the position of councillor due to the failure of the dossiers to comply with the legal provisions were identified. Of these, in 15 cases the ICs were targeted (insufficient valid signatures in the subscription lists), in 3 cases - PCRM, MRM and PPPDA (candidates' dossiers contained errors or the gender quota was not respected).

It's significant to highlight that with the introduction of the new Electoral Code, several candidacy requirements for mayors have been revised, including the reduction of the minimum age from 25 to 23 years and the imposition of a minimum compulsory general education requirement. According to data from the Central Election Commission (CEC), only 32 elected candidates (3.6%) were aged between 23 and 30 years. Concerning the education requirement, uncertainties regarding the validity of educational documents were noted in at least 14 cases (refer to the section on complaints). It should be recalled that The Promo-LEX Association, during public consultations on the new Electoral Code, advocated for the removal of the education criterion, arguing it is not in line with international guidelines.⁸³

5.2.4. Cancellation of Candidate Registrations and Amendments to Nominee Lists

The frequent modifications to candidate lists pose a challenge to electoral predictability. Observations from visits to 35 DEC II and 891 DEC I reveal at least 346 instances where changes to councillor candidate lists were requested. These modifications included: changes in the order of candidates on the list (222 cases), removal of a candidate from the list (87 cases), candidate replacement (37 cases), and complete substitution of the candidate list (10 cases). The majority of these requests were submitted by the following parties: PAS (71 requests), PSRM (54), PȘ (47), PCRM (25), PSDE (21), PLDM (17), LOC (16), and PDCM (15).

Regarding the cancellation of registration (for more details, see the section on complaints), in the session of October 30, 2023, the Central Election Commission (CEC) approved Resolution No. 1520. According to item 3 of the resolution, it was determined that representatives of the "CHANCE" Political Party violated Article 54, paragraphs (5)-(6) of the Electoral Code No. 325/2022 concerning the financing of the electoral campaign, voter bribing by the offering and promising of benefits from charitable actions to induce them to exercise their electoral rights, the use of financial means other than from the "Electoral Fund" account in the electoral campaign, exceeding the electoral fund ceiling, and the use of undeclared financial and material funds. In this context, 9 DEC I⁸⁴ were required to assess, by 16:00 on November 1, 2023, the cancellation of the registration of candidates nominated

82 At the request of the CEC, the ANI submitted the list of individuals who are prohibited from being elected, specifying the positions for which they are ineligible, as of August 28, 2023. This action was taken "to implement the provisions of Article 7, paragraph (2), letters c) and d) of the Electoral Code."

83 [Proposals made by the Promo-LEX Association](#) for the Joint Opinion of the Venice Commission and OSCE/ODIHR on the Draft Electoral Code of the Republic of Moldova (Law No. 288), page 23.

84 [CEC obliged](#) some district electoral councils to examine the cancellation of the registration of the candidates nominated for mayor and councillor on behalf of the political party "CHANCE": DEC Târșiței No. 34/27, Telenești district; DEC Țareuca No. 26/25, Rezina d.; DEC Ișcălău No. 17/16, Fălești d.; DEC Dobrogea Veche No. 28/14, Sângerei d.; DEC Merenii Noi No. 4/17, Anenii Noi d.; DEC Alexanderfeld No. 7/2, Cahul d.; DEC Pitușca No. 9/17, Călărași d.; DEC Răculești No. 12/22, Criuleni d.; DEC Joltai No. 36/24, UTAG.

for the positions of mayor and councillor by the “CHANCE” Political Party. All the 9 targeted DEC’s reviewed the CEC’s request; however, only 8 of them cancelled the registration of the candidates for mayor and councillor positions. Specifically, the DEC Alexanderfeld No. 7/2, r. Cahul, after review, decided that there is no legal ground for cancelling the candidates’ registration.

On November 3, 2023, the Commission for Emergency Situations of the Republic of Moldova issued Provision No. 92, which, as an exception to the provisions of Article 72, paragraph (4), and Article 102, paragraphs (2) and (5) of the Electoral Code No. 325/2022, ordered the cancellation of the registration of electoral competitors nominated by the political party “CHANCE” for the general local elections scheduled for November 5 (19), 2023. On the same day, the CEC, through Decision No. 1543⁸⁵, acknowledged the order from the CES. According to the CEC’s decision, the DEC and the PEB revoked all decisions related to the confirmation of their representatives and the trustworthy persons of the electoral competitors from the “CHANCE” party and ensured that all ballot papers were stamped “Withdrawn”. Additionally, the independent candidate for mayor of Balti municipality, Arina Corșicova, was deregistered after qualifying for the second round of voting.⁸⁶

5.2.5. Non-compliant registrations of electoral candidates for the councillor position in terms of gender quota compliance

According to Article 68, paragraph (3) of the Electoral Code, candidate lists for local elections must ensure a minimum representation quota of 40% for both sexes. The ranking of candidates on the lists shall be in accordance with the formula: minimum 4 candidates for every 10 seats.

During their observation, Promo-LEX reported 30 instances where the lists of candidates for councillors at DEC I were registered, 29 of which did not meet the 40% minimum quota and one case where the candidate positioning did not comply. The political parties that submitted these non-compliant lists yet were registered as competitors include: PȘ (11 cases), PAS (4), LOC (4), PCRM (2), PDCM (2), PSDE (1), and PR (1). It is important to note that, according to the stipulations of Article 68, paragraph (3), and Article 163, paragraphs (2) and (3), these lists should not have been accepted for registration. Some lists may have been amended following the visits from Promo-LEX observers.

85 [CEC Decision No. 1543/2023](#) from 3 November 2023 on the Provision of the Commission for Emergency Situations of the Republic of Moldova.

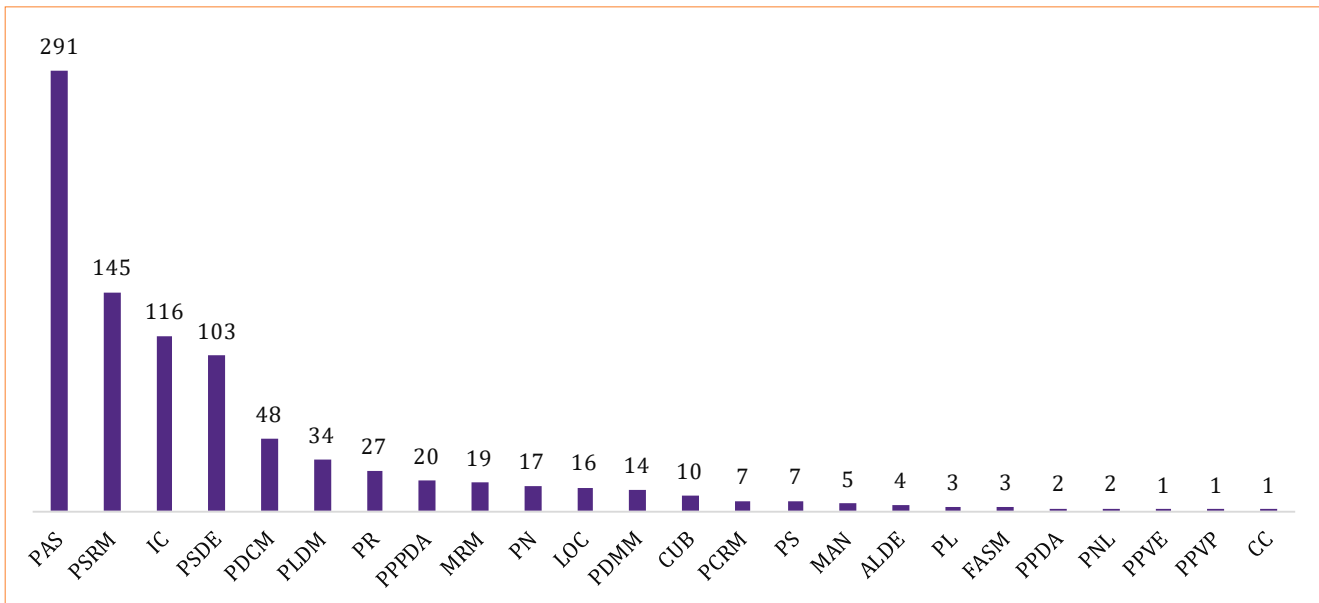
86 [Decision](#) on preliminary complaint No. CEC-10ALG/56 of 01.11.2023.

5.3. Political Affiliation of Elected Candidates

Following the general local elections (1st, 2nd round and repeat voting), out of 898 mayoral positions, 896 were elected.⁸⁷ Analyzing the political affiliation of the elected officials reveals that, 116 (13%) were held by ICs, while the remaining 780 by representatives of 23 political parties respectively (see Chart No. 20). The majority of elected mayors were nominated by PAS (291), PSRM (145) and PSDE (103). In terms of gender representation, women accounted for 22% (215) of the elected mayors, with just 13% (28) of these being independent candidates.

Chart No. 20

Mayors Elected in Line with their Political Affiliation



⁸⁷ In presenting current statistical data, we refer to elected mayors, not necessarily those whose mandates have been validated. (CEC set new local elections for mayor in Chioselia Rusă and Cotovscoe in ATUG, then repeated elections for mayor in Bubuieci, Chisinau).

CHAPTER VI

VOTERS' LISTS AND STATE ELECTORAL REGISTER

6.1. Evolution of data from the State Registry of Voters (SRV)

Throughout 2023, in preparation for the general local elections, the Central Electoral Commission (CEC) maintained its commitment to transparency by continuously publishing monthly voter data from the State Register of Voters (SRV), a move that Promo-LEX commends for its openness.

It is noteworthy that, contrary to the recent trend of a slight yet consistent decline in the number of registered voters within the SRV, the period leading up to the November 2023 general local elections saw a notable increase in voter registration. Specifically, there was an uptick of over 16,000 voters compared to the 2019 general local elections. This rise primarily stemmed from an increased registration of voters from the Autonomous Territorial Units (ATUs) on the left bank of the Dniester River and those lacking permanent or temporary residence documentation.

However, given the unique nature of general local elections—wherein only voters registered with a domicile or temporary residence in the respective ATU are eligible to vote—it's important to highlight that the actual number of voters able to participate has decreased by more than 56,000 compared to the 2019 elections, as detailed in Table 2.).

Table No. 2.

Dynamics of voter turnout based on SRV data

Date	Total number of voters	Dynamics	Voters without registered domicile/residence	Dynamics	ATU on the left bank of the Dniester River	Dynamics	Assigned by constituency	Dynamics
22.08.2019 ⁸⁸	3 285 894		224 250		243 416		2 818 228	
01.07.2020 ⁸⁹	3 285 874	-20	228 852	+4 602	249 013	+5 597	2808009	-10 219
01.06.2021 ⁹⁰	3 282 288	-3 586	237 322	+8 470	258 598	+9 585	2 786 368	-21 641

88 [The total number of voters](#) registered in the State Register of Voters is 3,285,894.

89 [The total number of voters](#) registered in the State Register of Voters, on 1 July 2020, is 3.285.874.

90 [The total number of voters](#) registered in the State Register of Voters, on 1 June 2021, is 3.282.288.

01.06.2022 ⁹¹	3 282 032	-256	249 289	+11 967	262 673	+4 075	2 770 070	-16 298
01.08.2023 ⁹²	3 301 121	+19 089	259 386	+10 097	270 836	+8 163	2 770 899	+829
02.10.2023 ⁹³	3 302 399	+1 278	273 112	+ 13 726	267 162	-3 674	2 762 125	-8 774

6.2. Ensuring Access and Receipt of Voter Lists

Based on Article 61, para. (9) of the Electoral Code and p. 64 of the CEC Calendar Programme, voter lists were required to be submitted to the PEBs by the 14th of October 2023, inclusively. Promo-LEX observers reported that, within the timeframe of 13th October to 17th November 2023, only 1,120 of the 1,403 PEBs visited, representing approximately 80%, received the voter lists by the mandated deadline.

According to Article 88, paragraph (9) of the Electoral Code, observers are entitled to access all electoral documentation, including electoral lists and the minutes produced by electoral bodies. Despite these legal stipulations, during visits conducted between 16 October and 4 November 2023, Promo-LEX observers reported being denied access to electoral lists at 28 out of the 1,366 open Precinct Electoral Bureaus (PEBs). Conversations with the members of these bureaus revealed several issues with the electoral lists:



After identifying various inaccuracies, 127 Precinct Electoral Bureaus (PEBs) proceeded to amend the electoral lists. It is important to note that in most instances where deceased individuals were found on the electoral lists, electoral office members reported an inability to remove these names due to the absence of official confirmatory documentation. This issue was particularly prevalent for individuals who passed away abroad or subsequent to the printing of the electoral lists.

Despite these challenges, a majority of the candidates and election officials interviewed by Promo-LEX observers acknowledged improvements in the accuracy of voter lists. Nevertheless, they also pointed out that specific issues persist, especially concerning the removal of individuals who have died abroad without official documentation. There was a consensus among officials on the need for establishing a procedure to systematically exclude such individuals from the electoral lists. On the other hand, while most voters reported not having personally verified the lists, they did not express significant concerns regarding their accuracy.

91 [The total number of voters](#) registered in the State Register of Voters, on 1 June 2022, is 3.282.032.

92 [The total number of voters](#) registered in the State Register of Voters, on 1 August 2023, is 3.301.121.

93 [The total number of voters](#) registered in the State Register of Voters, on 2 October 2023.

6.3. Special Restrictions on the Right to Vote in Local Elections

Voters who are not registered with a domicile or residence in the relevant Administrative-Territorial Unit (ATU) are excluded from participating in local elections. In line with Article 160 of the Electoral Code, the registration of a domicile or temporary residence must be established at least 3 months prior to the date of the first election round. This measure was recommended by the Promo-LEX Association to curb the practice of “artificial voter migration,” a tactic noted in past general local elections⁹⁴. Recognizing that this new requirement might inadvertently restrict certain voter groups’ rights, the CEC, following Promo-LEX’s suggestion, provided additional guidelines within its normative framework. These clarifications ensure that the stipulation does not disadvantage voters who maintain both a domicile and a temporary residence, those who have relocated their domicile or temporary residence within the same primary level ATU, and voting-age pupils/students who established their residence within the stipulated timeframe.⁹⁵

According to data from the Public Services Agency (ASP)⁹⁶, 6,318 citizens aged 18 and over changed their domicile or residence in the three months preceding the elections. Among these individuals, some could be pupils/students or have both a domicile and a residence, and therefore, might not be impacted by the restrictions. Nonetheless, it is possible that a certain portion of voters could have been affected by these regulations. However, Promo-LEX observers on election day did not report any incidents of voters being unable to vote at the polling stations due to these restrictions.

It is noteworthy to mention that, compared to 2019—when 8,453 people changed their domicile or residence without any legal provisions to prevent “artificial migration”—the number of individuals changing their domicile or residence ahead of the 2023 elections has decreased.

6.4. The Problem of the Quality of Basic Electoral Lists in Corjova Commune, Dubasari District

The Promo-LEX EOM highlights a persistent issue affecting the integrity of electoral lists, notably the exclusion of some *de facto* residents of Corjova commune⁹⁷. This problem is particularly significant in the context of local elections, where only voters registered with a domicile or temporary residence in the respective ATU are eligible to participate.

It’s important to note that many residents of the Corjova community *de facto* live in the commune, yet their identity documents register them as domiciled in the town of Dubasari, which lies outside the jurisdiction of the constitutional authorities. Consequently, these voters are omitted from the basic electoral lists of their actual locality. This issue persists across successive elections, with public and electoral authorities yet to offer any systemic resolutions. Promo-LEX considers the practice of voting on supplementary lists as a provisional measure that ought to be discontinued. There’s a pressing need to bring this issue into public discourse, facilitating a better understanding of various stakeholders’ perspectives and aiding in the easier identification of lasting solutions. Addressing the discrepancy between residents’ actual living situations and the addresses listed on their identity documents is a critical challenge that must be resolved.

94 Statement by Promo-LEX on special restrictions on voting rights in the general local elections of 5 November 2023.

95 CEC [Decision](#) No. 1153 of 4 August 2023 approving the Regulation on the Preparation, Administration, Dissemination and Updating of Voter Lists.

96 The information was provided by the ASP at the request of Promo-LEX by letter No 01/11964 of 26.12.2023.

97 For more details see: [Report No. 4](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 19; [Report No. 3](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 19-20.

Based on data from the National Bureau of Statistics (NBS), as of January 1, 2023, the population of the Corjova commune stood at 3,178 individuals (including those under 18 years of age).⁹⁸ However, information from the ASP indicated that, as of November 5, 2023, only 1,119 inhabitants aged 18 and over were officially domiciled or had residency in the municipality. The Central Election Commission (CEC) reported that 1,102 voters were registered on the basic electoral lists for the area.⁹⁹ On Election Day, 991 voters cast their votes using the supplementary lists in the first round, and 1,087 did so in the second round. These voters represented the majority of the total turnout, with 1,352 participating in the first round and 1,469 in the second round.

98 [Number of usually resident population](#) disaggregated by gender, at the level of first level administrative-territorial unit (village/commune, town/municipality) at the beginning of 2014-2023.

99 [Minutes](#) on the centralization of voting results for the election of the mayor of Corjova commune.

CHAPTER VII

PUBLIC ADMINISTRATION

The Central Electoral Commission (CEC) along with subordinate electoral bodies bear the primary responsibility for organizing and conducting elections. Concurrently, the Electoral Code assigns a significant role to other central and local public authorities in this regard.

The Promo-LEX Observation Mission for the 2023 General Local Elections identified several instances where central public authorities (CPAs) and/or local public authorities (LPAs) executed their legal responsibilities in manners that impacted the proper organization and execution of the elections.

7.1. Involvement of Central Public Authorities in the Organization and Conduct of Elections

Involvement of Law Enforcement Bodies in the Conduct of Elections. During these elections, both the Intelligence and Security Service (SIS) and the Moldovan Police played crucial roles. The actions taken, particularly those based on intelligence provided by the SIS, led to the CES suspending the broadcasting licenses of six television media services¹⁰⁰, and canceling the registration of electoral competitors nominated by the PȘ, all during the state of emergency.

Communication of Measures by the Government to Ensure Free and Fair Elections. Promo-LEX EOM identified an incident where the Government of the Republic of Moldova, rather than the Central Electoral Commission (CEC), communicated measures intended to facilitate the proper conduct of the local elections on November 5 (19), 2023.¹⁰¹

While the Observation Mission endorses the active engagement of state authorities in preventing and penalizing all forms of electoral misconduct, particularly those involving illegal financing, it emphasizes that, according to legal mandates, the responsibility to guarantee conditions conducive to the free and fair exercise of citizens' constitutional rights to vote and stand for election primarily rests with the CEC.

Circulars of Ministries in Ensuring the Smooth Conduct of General Local Elections¹⁰² Promo-LEX observed that the Ministry of Labour and Social Protection and the Ministry of Education and Research issued at least two circulars to their subordinate institutions. These circulars outlined directives to prevent the misuse of administrative resources and to ensure equal treatment for all electoral competitors.

¹⁰⁰ [Report No. 4](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 8.

¹⁰¹ [Report No. 2](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 21.

¹⁰² [Report No. 2](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 21-22.

While MO Promo-LEX views the actions of the central authorities during the election period as beneficial, reports from Promo-LEX observers indicate that the guidelines provided in these circulars were not fully adhered to, both by the recipients and, notably, by the issuers themselves (refer to Chapter VIII).

7.2. Involvement of Local Public Administration in the Organization and Conduct of Elections

The Promo-LEX Observation Mission for the 2023 General Local Elections closely monitored the implementation of electoral legislation by local authorities throughout the election period, from 15 September to 18 November 2023. Promo-LEX observers visited all 898 Local Public Administrations (LPAs), identifying numerous instances where LPAs failed to fully meet their legal obligations.

Nomination of LPA Representatives to Lower-level Electoral Bodies. According to Article 35, paragraphs (4) and (7) of the Electoral Code, candidates for two members of the District Electoral Council (DEC) of the second level and the first level are proposed by the respective local councils. Additionally, Article 38, para. (10) specifies that candidates for three members of electoral councils are proposed by first-level local councils.

Upon reviewing CEC decisions regarding the confirmation and amendment of the composition of the DEC II, and based on observer reports on the nominal composition of DEC I and Precinct Electoral Bureaus (PEB), Promo-LEX Election Observation Mission (EOM) observed that a majority of local government authorities exercised their right to nominate members to these electoral bodies. Nonetheless, there were noticeable gaps in this process. Specifically, in 526 electoral offices (27%), nine DEC I (1%), and three DEC II (8%) at the second and first level, local councils did not nominate candidates for membership in the aforementioned electoral bodies. Furthermore, while regulations mandate the nomination of two members to both DEC II and DEC I, it was found that in 19 electoral councils, the number of members nominated by LPAs was fewer than two. In addition, in 470 electoral councils (24%), the number of members proposed by LPAs was fewer than three (see Table No. 3).

These issues likely arise from a scarcity of human resources at the local level, combined with a shortage of individuals who possess the interest, calling, and training to serve as election officials. Recognizing that the success of election organization and management heavily relies on the expertise of these officials, we emphasize our suggestion to both the CEC and the Center for Continuous Electoral Training (CICDE) to prioritize the ongoing professional development of election personnel. This ensures the electoral regulations are consistently applied across the board. Furthermore, we advocate for the execution of joint activities (involving LPA/CEC/CICDE), aimed at bolstering public engagement and interest in the role of election official.

Table No. 3.

Nomination of Members of Lower Electoral Bodies

No. of members nominated by LPAs	DEC II	DEC I	PEB
0	3	9	526
<2	8	11	-
<3	-	-	470

Ensuring Conditions for Voter Information and Electoral Campaigning. According to Article 70, para. (10) of the Electoral Code, LPAs must designate and make available a minimum number of specific sites for election posters and a minimum number of venues for voter meetings within 3 days prior to the commencement of the electoral campaign. These decisions/rules must be promptly posted at the premises of these authorities and communicated to interested parties through media and other available communication means. Additionally, paragraph 68 of the *Regulation on the Provision, Distribution and Broadcasting of Political and Electoral Advertising and Messages of Public Interest* dictates that billboards for election posters should cover a minimum area of 2 square meters. For every 6,000 voters, at least two such specialized spots for electoral displays must be installed, and in the case of municipalities, towns, and communes, LPAs are required to ensure a minimum of one special location equipped with fixed electoral display panels of at least 2 square meters for each community under their jurisdiction.

The Observation Mission assessed the compliance of local authorities with their obligations under electoral legislation and observed the following:

Regarding the decision to allocate spaces for posters: Out of the total 896 Local Public Administrations (LPAs), 870 municipalities (97%) made decisions to allocate spaces for election posters. Among these, only 699 municipalities (80%) publicly displayed the adopted decisions at their premises. Furthermore, 807 LPAs (90%) provided spaces for poster display, but only 711 municipalities (88% of those providing spaces) met the sufficient space criteria as outlined in item 68 above.

Regarding the decision to provide venues for meetings with voters: Of the 896 LPAs, 856 municipalities (95%) decided to allocate spaces for voter meetings. However, only 681 of these municipalities (80%) made the decisions publicly available on their premises. Space was offered free of charge in 713 municipalities (83%), while 143 municipalities (17%) charged a fee for the use of the space (see Table No. 4).

Table No. 4.

Compliance with Legal Provisions on the Organization of Local Elections 2023

Approval of decisions/ orders on		Display at the LPA premises of decisions/ orders on		Providing clean space for advertising			Availability of space for meetings with voters	
Electoral advertising	meetings with voters ¹⁰³	Electoral advertising	meetings with voters	total	sufficient	insufficient	Free of charge	for a fee ¹⁰⁴
870 (97%)	856 (95%)	699 (80%)	681 (80%)	807 (90%)	711 (88%)	96 (12%)	713 (83%)	143 (17%)

The Promo-LEX EOM observed that a minimum of 15% of LPAs did not display decisions/orders of public interest on their premises, which negatively impacted the level of information available to citizens. In light of this, there's an emphasized need for the creation of a mechanism by the second level electoral councils, which operate continuously, to monitor and, if necessary, penalize local authorities that fail to comply with the relevant legal provisions. Specifically, this refers to Article 70, paragraph (10), and p. 68 and 122 of the *Regulation on the Provision, Distribution and Broadcasting of Political and Electoral Advertising and Messages of Public Interest*.

103 Among the spaces offered are: houses of culture, festival halls, educational institutions, parks and squares, stadiums, libraries, town halls.
 104 Local authorities have set fees ranging from 82 to 4,000 lei per hour and from 285 to 2,000 lei per meeting respectively.

Regarding the use of premises by competitors, observers reported that in at least 235 settlements, premises were utilized for meetings with citizens. In total, 28 competitors (22 political parties and 6 independent candidates) used the premises, with 34 instances involving a fee and 201 instances free of charge. According to information from observers, PAS organized the majority of these meetings (143 free of charge and 16 for a fee), followed by PŞ (50 free of charge and 10 for a fee), PSRM (40 free of charge and eight for a fee), PSDE (28 free of charge and four for a fee), PDCM (19 free of charge and six for a fee), and PPPDA (12 free of charge). Other candidates utilized the space for meetings with voters to a lesser extent.¹⁰⁵

Supplying Electoral Bodies with Essential Premises and Materials for Their Operations. According to observations by Promo-LEX, electoral bodies faced several challenges in organizing elections, including a shortage of space, inadequate working equipment (such as computers), and unfavorable thermal conditions. Specifically, during the first round of elections, only 26% of the Polling Stations had heating, a figure that increased to 77% in the second round (as detailed in Chapter XII - Election Day). It's important to highlight that the Electoral Code mandates a 14-hour voting day (from 07:00 to 21:00), yet the proportion of polling stations equipped with heating was relatively low. However, it was observed that for both election rounds, 98% of polling stations had sufficient lighting to conduct electoral procedures. Given these observations, we urge local authorities to fully support electoral bodies in fulfilling their responsibilities and to swiftly address the issues they report regarding election organization.

¹⁰⁵ MRM (seven - free of charge and 1 - for a fee), PR (five - free of charge and three - for a fee), PLDM and CC (each six - free of charge), PNL and PPDA (each four - free of charge), LOC (three - free of charge), CUB (two - free of charge and 1 - for a fee), MAN, ALDE and PN (each two - free of charge), PS (1 - free of charge and 1 - for a fee), PL, PNM, PDMM and PCRM (each 1 - free of charge), 6 ICs (six - free of charge).

CHAPTER VIII

ELECTORAL COMPETITORS' PERFORMANCE

8.1. Aspects Regarding the Nomination of Candidates

According to Article 1 of the Electoral Code, the nomination of candidates is the procedure of adoption by political parties, electoral blocs of decisions on candidates for elective office, held at meetings of the competent bodies of political parties, electoral blocs. At the same time, Art. 63, para. (1) of the Electoral Code stipulates that the nomination of candidates shall begin immediately after the establishment of district electoral councils, but not earlier than 60 days before the election day. According to the Calendar Programme,¹⁰⁶ the nomination of candidates for mayors and local councils of level II was to be carried out from 6 September 2023, and those for level I - from 26 September 2023.

However, contrary to what has been mentioned, as early as 6 September 2023, various political parties had already made public announcements regarding their potential candidates for the general local elections. This trend of early declarations was evident from October 2022. Specifically, for the City Hall of mun. Chisinau, 11 political parties had publicly revealed their candidates who would be entering the electoral race for the mayor's position (PPPO¹⁰⁷, PDCM¹⁰⁸, PACE¹⁰⁹, PAS¹¹⁰, LOC¹¹¹, CUB¹¹², PPPDA¹¹³, PL¹¹⁴, PSDE¹¹⁵, PSRM¹¹⁶ and CC¹¹⁷), Additionally, two other party leaders announced their intentions to run for mayor (Ion Ceban – MAN¹¹⁸ and Vasile Costiuc – PPDA¹¹⁹). This phenomenon was not limited

106 According to p. 9 and 24 of the [Calendar Programme](#) for the organization and conduct of the general local elections of 5 November 2023.

107 Former interim mayor of the capital Ruslan Codreanu (PPPO) will run for Chisinau mayor in 2023, October 22, 2022.

108 At the meeting of the National Political Council of the [PDCM](#) on 12 November 2022, it was decided: Mr. Anatol Usatâi was approved as candidate of the PDCM for the position of Mayor General of the municipality of Chisinau.

109 The Permanent Bureau of the [PACE](#) Party has approved the candidates for mayors of several municipalities in the country for the 2023 general elections, posted on 17 March 2023.

110 The [PAS](#) candidate for mayor of Chisinau has been nominated Lilian Carp, from 12 June 2023.

111 The [League of Towns and Communes](#) nominated the candidate for the position of Mayor General of Chisinau municipality, as of 19 June 2023.

112 Ion Bulgac, [CUB](#) candidate for mayor of Chisinau, 25 June 2023.

113 Presentation of the candidate of the [DA Platform](#) for the elections for mayor of Chisinau municipality on July 3, 2023.

114 Ion Purice – candidate of [Liberal Party](#) for the position of Mayor General of the mun. Chisinau, from 24 July 2023.

115 The [PSDE](#) vice-president, Vadim Brînzaniuc, will be the party's candidate in the elections in Chisinau. The decision was taken by the Chisinau municipal organization of the PSDE on 27 July 2023.

116 [PSRM](#) decision on the candidate for mayor general of the capital, August 2, 2023.

117 Mihail Poleanschi - candidate of the [Civic Congress](#) for the post of Chisinau mayor general, from August 9, 2023.

118 [Ion Ceban](#) will run for a second term as mayor of Chisinau on August 25, 2022.

119 [PPDA](#) leader Vasile Costiuc will run in the autumn elections for the post of Mayor General of the capital.

to Chisinau but was also observed in the City Hall of mun. Balti (PS – Nicolae Grigorişin¹²⁰), and at the level of APL I (PAS, PACE, PDCM, PPR, CC, PSDE etc.)¹²¹.

Promo-LEX views the *de facto* nomination of candidates before the legally established deadline, along with their electoral political promotion prior to the commencement of the electoral campaign, as a violation of the principle of equal opportunities for electoral competitors. This also facilitates the circumvention of legal provisions regarding campaign financing. Consequently, Promo-LEX suggests that the legislative authority consider amending the electoral legal framework to prohibit the explicit political promotion of a potential candidate following their public announcement but before their official nomination.

8.2. Election-oriented Promotional Activities Before the Official Campaign Period

According to Article 70, paragraph (3) of the Electoral Code, the election campaign for any type of election commences on the date the electoral competitor is registered but no earlier than 30 days prior to the voting day. The campaign concludes either when the registration of the electoral competitor is canceled or on the Friday preceding the voting day. As per the Calendar Program approved by the CEC¹²², the election campaign for all competitors began on 6 October 2023.

However, contrary to the above, by the start of the election campaign, at least 245 activities promoting candidates were observed (see Table 5). The most widespread activities were the distribution of information materials - 64% and sponsored posts on social media - 16%.

Table No. 5.

Election-oriented Promotional Activities

Activities conducted	PSRM	PAS	MAN	PSDE	PR	PŞ	PLDM	PDCM	PPDA	PS	Another 9 candidate ¹²³	Total
Distribution of Information Materials	74	25	37	12	3					3	2	156
Sponsored Posts	6	7		2	7	1	8	4		1	3	39
Press Conferences	6	2			1	8	1	2	7	1	2	30
Nomination Activities	1		1		2	2		2			5	13
Other		4		1				1			1	7
Total	87	38	38	15	13	11	9	9	7	5	13	245

According to Promo-LEX observers' reports, most activities were carried out by PSRM - 36%, followed by PAS and MAN - 16% each of the observed activities. Of the total activities observed, most were organized in Chisinau - 59% and Balti - 20%.

120 Grigorişin-Gligor joint [Conference](#) on 3 February 2023.

121 [Report](#) No. 1. Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 25.

122 According to point 42 of the [Calendar Programme](#) for the implementation of actions for the organization and conduct of the general local elections of 5 November 2023.

123 CUB, LOC, MRM, PACE, PN, CC, BE Ruslan Codreanu, IC Serghei Anastasov și IC Dmitri Moruz.

8.3. Electoral Promotion Activities

In the election campaign period, a total of 2,519 campaign promotion events were conducted by 31 political parties and 44 independent candidates (ICs), as detailed in Table 6. The primary methods of campaign promotion included the distribution of election materials, accounting for 48% of activities, and meetings with voters, which comprised 37% of the reported activities.

Table No. 6.

Electoral Promotion Activities

Activities conducted	PAS	PSRM	PȘ	PDCM	PPPDA	PLDM	PSDE	PN	PR	CUB	MAN	PS	Another 19 Parties ¹²⁴	44 IC ¹²⁵	Total
Distribution of Information Materials	276	252	123	49	62	42	69	39	54	41	38	16	112	43	1.216
Meetings with voters	274	140	103	83	38	52	20	42	12	20	9	15	61	59	928
Campaign launches	39	7	6	6	4	5	7	2	1	6		3	6	1	93
Press Conferences	12	17	10	3	13	3	11	2	2	3	23	2	16		117
Electoral Debates	10	7	4	2	1	8	3	1	4	3	1	3	18	7	72
Protests/ flash mobs	1		22		1				1				1		26
Other	10	7	15	5	10	4	4	2				1	8	1	67
Total	622	430	283	148	129	114	114	88	74	73	71	40	222	111	2.519

According to Promo-LEX observers, most activities were carried out by PAS - 25%, followed by PSRM - 17%, PȘ - 11% and PDCM - 6%. According to the location of the electoral promotion activities, most were organised in Chisinau - 30%, Balti - 10% and Ungheni - 5%.

Compared to the 2019 general local elections, there has been an increase in the number of election promotion activities, rising from 2,404 in 2019 to 2,519 in 2023. Candidates continued to show a preference for traditional promotional activities, such as the distribution of election materials and meetings with voters.

124 ALDE, BE Ruslan Codreanu, MPSN, NOI, PDMM, PL, PNL, PNM, PPBN, PPDA, PPM, PPN, PPVP, PVE, PCRM, CC, MRM, LOC and PACE.

125 IC Anastasov Serghei, IC BellCug Ivan, IC Belitei Liviu, IC Belitei Victor, IC BorimelCcov Alexandr, IC Budișteanu Igor, IC Cara Janna, IC Caraseni Stepan, IC Casian Valentina, IC Chetrușca Aurel, IC Chiriac Dumitru, IC Chiulafli Sergei, IC Constandoglo Oleg, IC Corșicova Arina, IC Coșarnaia Vera, IC Crețu Ion, IC Cuzuioc Ghenadie, IC Dandiș Nicolae, IC Donțu Alexandru, IC Dudoglo Nicolai, IC Filimon Ion, IC Fucedji Vadim, IC Garizan Oleg, IC Gorban Olga, IC Guzun Ion, IC Jizdan Vadim, IC Malu Vladimir, IC Masleaev Victor, IC Momat Elena, IC Moruz Dmitri, IC Musteață Valeriu, IC Nasulea Ion, IC Olaru Igor, IC Petică Gheorghe, IC Popescu Ala, IC Rența Sergiu, IC Rudicov Andrei, IC Slobodean Igor, IC Sobor Vasili, IC Topal Anatoli, IC Tureac Alexandru, IC Verdeș Aurel, IC Vrabie Vitalie, IC Zagorcea Iurie.

8.4. Use of Electoral Advertising

During the election campaign, Promo-LEX observers documented at least 4,851 instances of election advertising being utilized, as detailed in Table 7. The predominant forms of advertising included voter information materials (such as newspapers, posters, flyers, etc.) at 35%, followed by sponsored posts on social media at 25%, and street billboards/banners and tents accounting for 17%.

Table No. 7.

Electoral Advertising

Advertising Type	PAS	PSRM	PȘ	PLDM	PN	CUB	PDCM	MAN	PPDA	PSDE	PR	MRM	Another 17 parties ¹²⁶	52 CI ¹²⁷	Total
Newspapers, leaflets, flyers, etc.	467	327	173	73	54	38	81	29	77	90	59	27	137	75	1.707
Sponsored posts	430	16	27	129	124	121	33	110	10	4	4	75	83	32	1.198
Billboards, tents	265	116	60	17	38	42	61	35	43	26	47	6	36	14	806
Jackets, bags, caps, etc.	251	193	55	9	11	18	2	1	37	19	23	6	30	3	658
Video spots	119	25	70	37	5	7	39	9	6	19	24	6	38	23	427
Local print media	10			1	4	2	1		4	9			4	4	39
Online banners	5	1	2		3	1		1	1		2				16
Total cases	1.547	678	387	266	239	229	217	185	178	167	159	120	328	151	4.851

According to Promo-LEX observers, the majority of cases were attributed to PAS, accounting for 32%, followed by PSRM at 14%, and PȘ at 8%.

126 ALDE, BE Ruslan Codreanu, CC, LOC, MPSN, PACE, PCRM, PDMM, PL, PNL, PNM, PPDA, PPM, PPN, PPVP, PS și PVE.

127 IC Anastasov Serghei, IC Arnaut Pavel, IC BellCug Ivan, IC Belitei Liviu, IC Belitei Victor, IC BorimelCcov Alexandr, IC Budișteanu Igor, IC Bumbu Ion, IC Cara Janna, IC Caraseni Stepan, IC Casian Valentina, IC Chetrușca Aurel, IC Chiriac Dumitru, IC Chiulaffli Sergiei, IC Constandoglo Oleg, IC Corșicova Arina, IC Coșarnaia Vera, IC Crețu Ion, IC Cuzuioac Ghenadie, IC Dandiș Nicolae, IC Donțu Alexandru, IC Dudoglo Nicolai, IC Filimon Ion, IC Fucedji Vadim, IC Garizan Oleg, IC Gorban Olga, IC Guzun Ion, IC Jizdan Vadim, IC Lupov Veaceslav, IC Malu Vladimir, IC Masleaev Victor, IC Momat Elena, IC Moruz Dmitri, IC Musteață Valeriu, IC Nasulea Ion, IC Olaru Igor, IC Orbu-Novac Alina, IC Ostaș Lidia, IC Petică Gheorghe, IC Popescu Ala, IC Rența Sergiu, IC Rudicov Andrei, IC Slobodean Igor, IC Sobor Vasili, IC Topal Anatoli, IC Tureac Alexandru, IC Urechean Radu, IC Verdeș Aurel, IC Vieru Valeriu, IC Vrabie Dumitru, IC Vrabie Vitalie și IC Zagorcea Iurie.

When comparing to the 2019 general local elections, there was an increase in instances of electoral advertising, from 4,668 in 2019 to 4,851 in 2023. Notably, there was a significant rise in the use of sponsored posts on social media as a form of advertising. While in 2019, these accounted for only 5% of electoral advertising, by 2023, sponsored posts on social networks represented 25% of all reported cases of electoral advertising use. This shift indicates that social media is becoming an increasingly popular platform for candidate promotion in elections.

Despite the growing use of social networks, it's observed that they also serve as an effective means for circumventing legal regulations on campaign financing (for more details, refer to Chapter IX, sub-chapter 9.5.7 *Estimates Expenditures for Advertising on Internet*).

The guidelines for utilizing and disseminating election advertising are detailed in the CEC Regulation on the Provision, Distribution and Broadcasting of Political and Electoral Advertising and Messages of Public Interest.¹²⁸ Throughout the election campaign, Promo-LEX noted at least 269 instances where advertising was used in contravention of legal regulations. Among these, the SP was implicated in 44 (16%) of the cases, PAS in 39 (14%), and PR in 32 (12%). Compared to the 2019 general local elections, there was an observed increase of 98 cases in the use of electoral advertising that violated legal provisions.

In this context, it's important to note that paragraph 75 of the aforementioned regulation mandates that ***during the electoral period, providers of advertising services must execute tasks related to the preparation, production, distribution, and placement of advertisements on billboards solely using funds transferred in advance to the "Electoral Fund" account.*** This requirement represents a new measure introduced with the amendment of the legal framework. Despite this stipulation, there was an observed instance involving PAS where electoral materials were prepared and printed without adhering to the advance payment requirement.

On 14 December 2023, the Secretariat of the Parliament recorded the introduction of draft law No 473, aimed at amending certain normative documents (the Electoral Code, the Law on Political Parties),¹²⁹ This proposed amendment seeks to redefine "electoral campaign" by removing the term "preparation" from its description. The rationale behind this amendment is that mandating the execution of preparatory activities strictly within the electoral campaign period diminishes the legally allotted time for direct campaign activities. Observers are keenly watching to see if and how the CEC will implement changes in the *Regulation on the Provision, Distribution and Broadcasting of Political and Electoral Advertising and Messages of Public Interest*.

According to paragraph 15 of the same regulation, ***the use of political advertising material as election campaign material during the election campaign period is prohibited.*** This provision was implemented for the first time following the amendment of the legal framework. However, Promo-LEX observers documented at least 9 instances where election advertising was disseminated concurrently with political advertising. Among these, the PSRM was implicated in 4 cases, CUB in 2 cases, and PAS, MAN, and PR each in 1 case.

Also, in accordance with points 19 and 97 of the Regulation, ***each piece of printed material must include the following information:*** the clear, legible, and understandable name of the entity that commissioned it and the name/title of the advertising subject; the labels "Political advertising" or "Election advertising"; the identification details of the specialized economic entity that provided the printing services and, if relevant, of the individual who

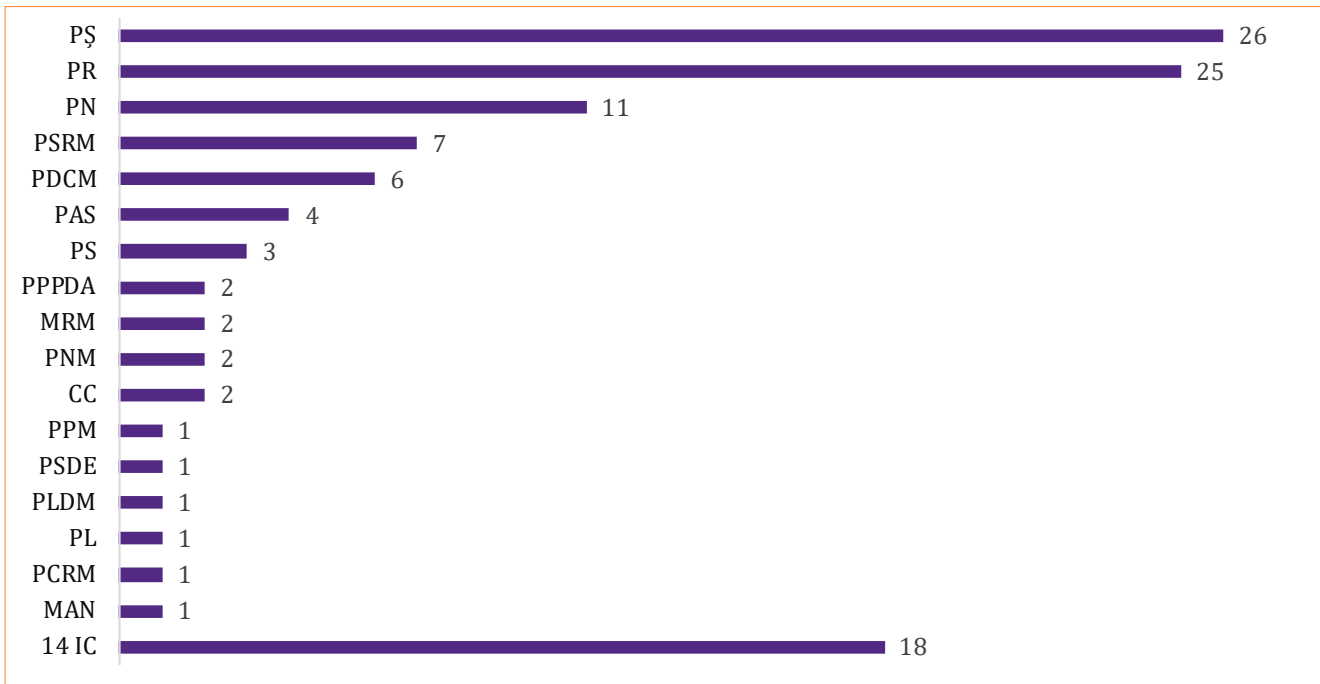
128 CEC [Regulation](#) on the Provision, Distribution and Broadcasting of Political and Electoral Advertising and Messages of Public Interest. Approved by CEC Decision No. 1155 from 4 August 2023.

129 [Draft of Law](#) on Amendment of several Normative Acts (Electoral Code No 325/2022 - Art. 1, 16, 45 etc.; Law on Political Parties No. 294/2007 - Art. 25).

executed the design and/or layout of the printed material; the number of copies printed, the order number, and the invoice number for the payment. This requirement isn't new but has been carried over from the previous legal framework.

Chart No. 21

Instances of Electoral Advertising Distributed Without Full Typographical Details



However, contrary to the above, at least 114 cases were reported where election advertising did not contain the full information required by the legal framework (see Chart No.21). Of these, in 26 cases the PȘ was targeted, in 25 - PR, in 18 - IC¹³⁰, in 10 - PN, in 7 - PSRM, in 6 - PDCM, in 4 - PAS, etc.

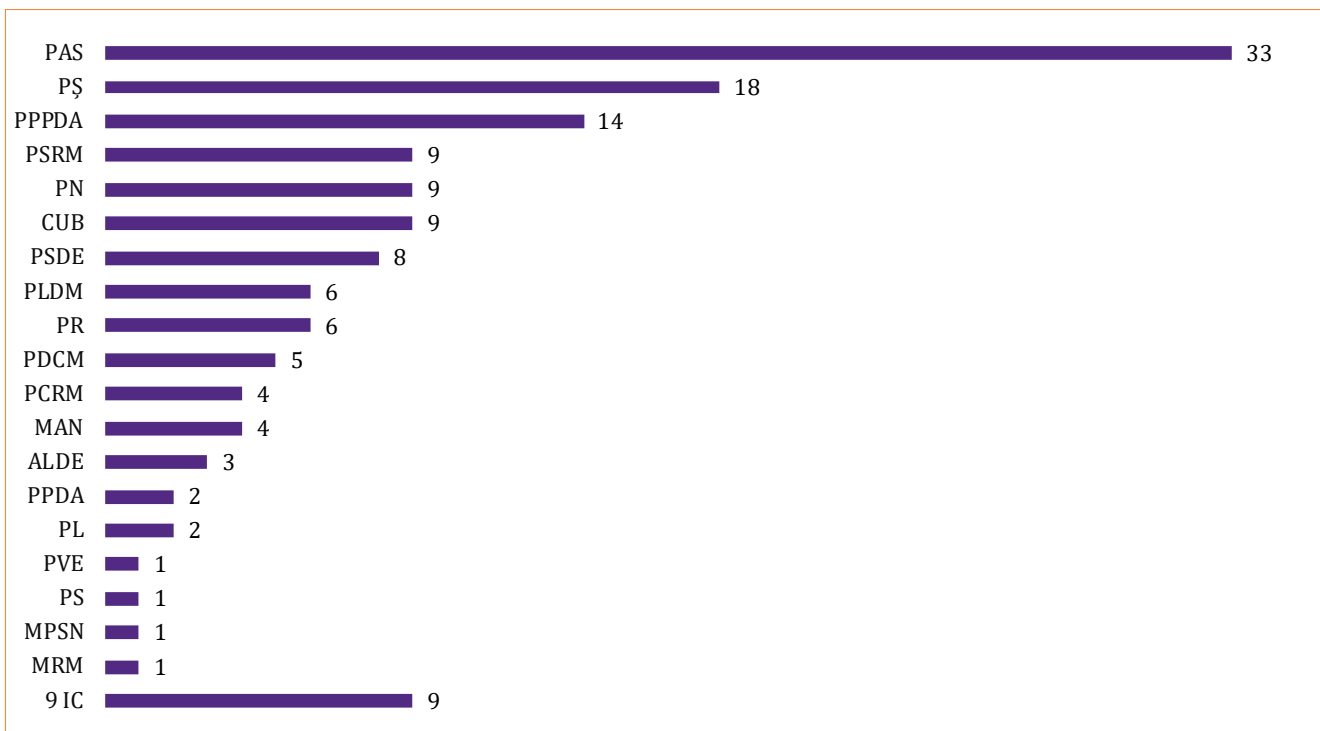
Similarly, as stated in paragraph 76 of the regulation, **it is prohibited to place electoral advertising** on public transport station pavilions, on trees and/or by causing damage to/destroying trees, on poles, in cemeteries, places of worship, squares, parks, public gardens, on water troughs, on the exteriors of windows and balconies of apartment buildings, on fences of private homes, as well as on their fencing components, etc. The act of placing advertising posters outside designated areas is considered an offence and is subject to penalties according to the Code of Offences. This guideline is not a novelty but has been adopted from the previous legal framework, enriched by specifying locations where advertising placement is forbidden (e.g., water troughs, residential balconies).

Contrary to these regulations, observers identified at least 145 instances where electoral advertising was placed or distributed in unauthorized locations by 19 political parties and 9 independent candidates¹³¹ (see Chart No. 22). Of these instances, PAS was implicated in 33 cases, PȘ in 18, PPPDA in 14, and both PSRM and PN in 9 cases each, among others.

130 IC Verdeș Aurel – 4 cases, IC Jizdan Vadim – 2 cases, by one case – IC Gorban Olga, IC Petică Gheorghe, IC Anastasov Serghei, IC Sobor Vasili, IC Bumbu Ion, IC Topal Anatoli, IC Caraseni Stepan, IC Vrabie Dumitru, IC Dudoglo Nicolai, IC Budișteanu Igor, IC Crețu Ion și IC Cara Janna.

131 IC Dandiș Nicolae, IC Rența Sergiu, IC Bumbu Ion, IC Sobor Vasili, IC Caraseni Stepan, IC Crețu Ion, IC Anastasov Serghei, IC Cara Janna, IC Coșarnaia Vera.

Instances of Unauthorized Placement of Electoral Advertising



Regarding the matter discussed, it should be noted that the CEC reviewed 5 complaints/appeals related to advertising. Based on these, it was determined that advertising was distributed in violation of legal provisions in the cases of PR, PSRM, and 3 ICs

8.5. Misuse of Administrative Resources

The new Electoral Code, for the first time, defines *administrative resources* and prohibits candidates from using them. This includes launching or participating in the launch of infrastructure projects or purchases from the national public budget, as well as the use of equipment, resources, and public goods during the election period.¹³² However, it is noted that the definition adopted is too narrow to encompass all situations observed in the context of political party activities and election campaigns.

During the public consultations on the subject, Promo-LEX advocated the adoption of the definition formulated by the Venice Commission,¹³³ as follows: „Administrative resources are human, financial, material, in natura and other immaterial resources enjoyed by both incumbents and civil servants in elections, deriving from their control over public sector staff, finances and allocations, access to public facilities as well as resources enjoyed in the form of prestige or public presence that stem from their position as elected of public officers and which may turn into political endorsements or other forms of support.” Promo-LEX also recommended expanding the prohibition on the use of administrative resources to include the periods between elections,¹³⁴ due to the widespread exploitation of these resources by political parties to build political capital.

132 The definition of the cited term and reference to some international standards in the field can be found in [Report No. 2](#) (p. 25) and [Report No. 4](#) (p. 23) of Promo-LEX Observation Mission to the General Local Elections of 5 November 2023.

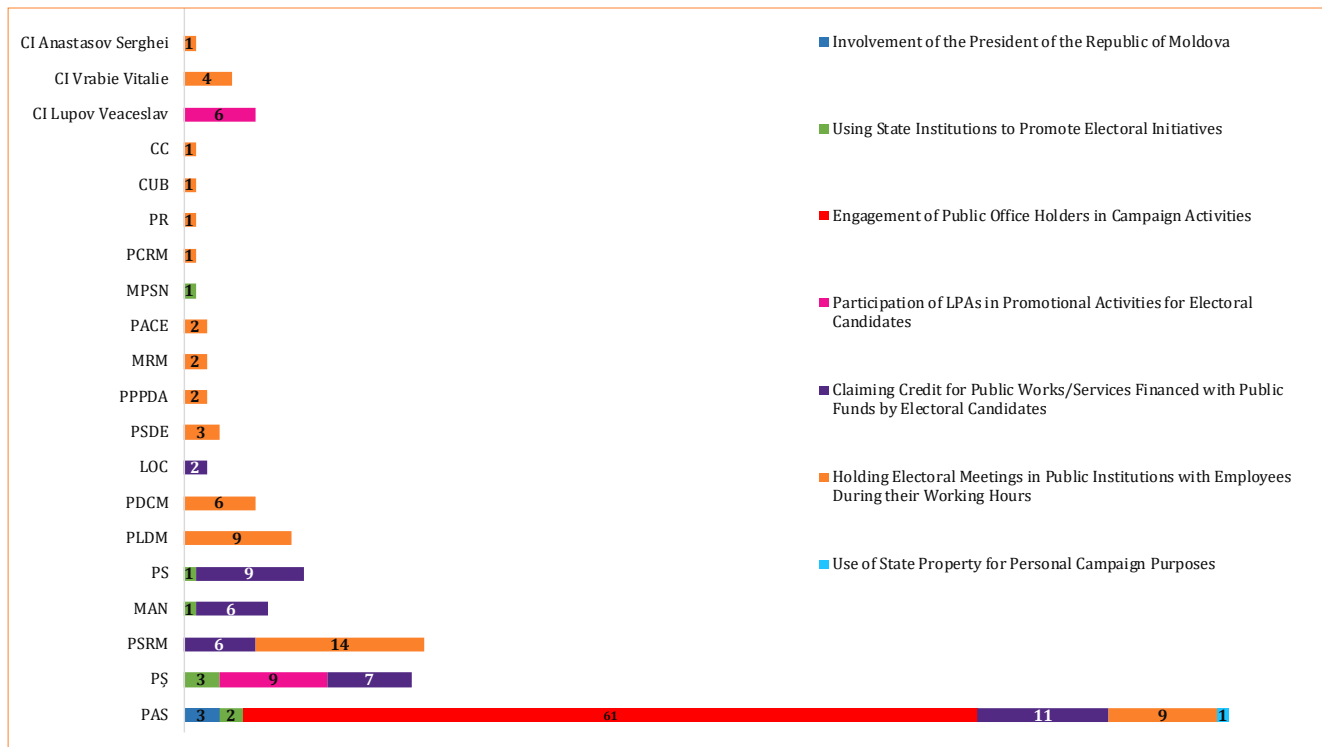
133 [Report](#) on the Misuse of Administrative Resources During Electoral Processes.

134 [Report](#) “Report on Political Party Financing in the Republic of Moldova: A 2021 Retrospective, p. 39.

During the 2023 general local elections, Promo-LEX identified at least **185 instances that could be classified as misuse of administrative resources**. Specifically, 87 instances involved PAS, 20 - PSRM, 19 - PȘ, 10 - PS, 9 - PLDM, 7 - MAN, 6 each to PDCM and IC Veaceslav Lupov, 4 - IC Vitalie Vrabie, 3 - PSDE, 2 each to LOC, PPPDA, MRM, and PACE, and 1 case each involved MPSN, PCRM, PR, CUB, CC, and IC Serghei Anastasov (refer to Chart No. 23).

Chart No. 23

Misuse of Administrative Resources in Electoral Context



Activities deemed as misuse of administrative resources included:

- *Involvement of the President of the Republic of Moldova in the general local elections* - 3 cases, targeting PAS.¹³⁵;
- *Using state institutions to promote electoral initiatives* – 8 cases. Of these, 2 cases targeted the Government of the Republic of Moldova (benefiting PAS candidates)¹³⁶, 3 involved local councils of ATUG, Orhei, and Taraclia (benefiting PȘ candidates)¹³⁷, by one case to each – City Halls of municipalities of Chisinau and Balti,¹³⁸ and, one case – Condița City Hall (benefiting MPSN)¹³⁹;
- *Engagement of Public Office Holders in Campaign Activities* – 61 cases, with PAS being targeted. These included at least 34 cases involving the Prime Minister of the Republic of Moldova, Dorin Recean, 18 cases with the Minister of Infrastructure and Regional Development, Andrei Spînu, and 9 cases with the Minister of Education and Research, Dan Perciun; Promo-LEX believes that the participation of the President and public officials in election promotion activities undermines the fairness of electoral competition. Their involvement in campaigns breaches the fundamental principle of a distinct separation between the state apparatus and political party activities, potentially skewing the electoral landscape in favor of certain competitors.

135 [Report No. 5](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 15.
 136 [Report No. 2](#), (p. 26) și [3](#) (p. 23) of Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 23.
 137 [Report No. 3](#), Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 23.
 138 [Report No. 1](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 28.
 139 [Report No. 2](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 26.

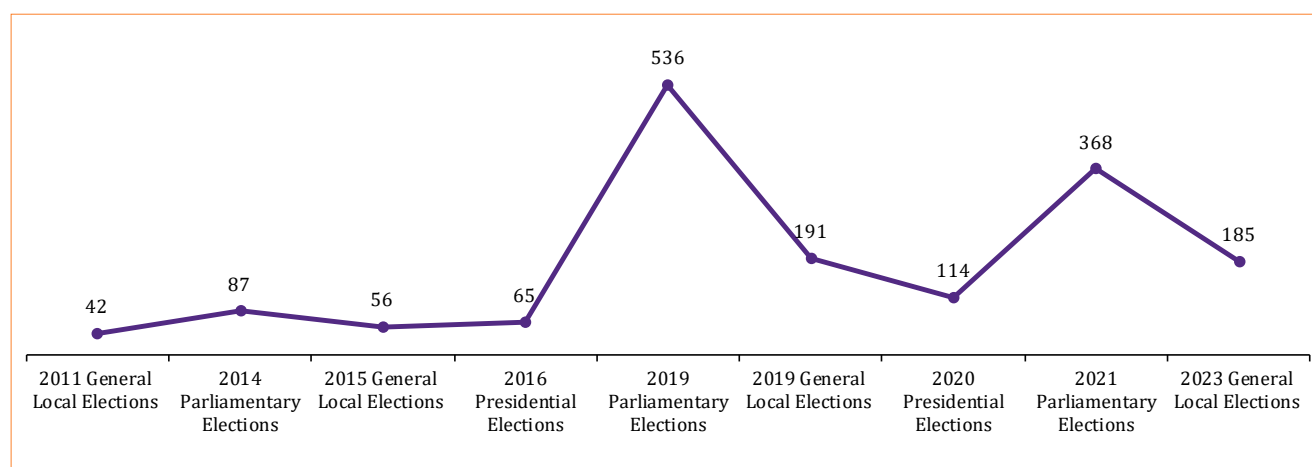
- *Participation of LPAs in promotional activities for electoral candidates* – 15 cases, with 6 involving IC Veaceslav Lupov and 9 targeting PȘ;
- *Claiming credit for public works/services financed with public funds by electoral candidates* – 41 cases. Of these, 11 targeted PAS, 9 – PS, 7 – PȘ, 6 – PSRM, 6 – MAN and 2 – LOC;
- *Holding electoral meetings in public institutions with employees during their working hours* – 56 cases (refer to Annexe No. 3), including 14 involving PSRM, 9 each for PAS and PLDM, 6 involving PDCM, 4 - IC Vitalie Vrabie, 3 - PSDE, 2 each for PPPDA, PACE, and MRM, and 1 each for CC, IC Serghei Anastasov, CUB, PCRM, and PR.
- *Use of state property for personal campaign purposes* – 1 case, targeting PAS.

In light of these observations, Promo-LEX EOM concludes that electoral competitors were not afforded equal opportunities to disseminate their electoral messages. The organization highlights that the exploitation of administrative resources unfairly benefits those candidates who engage in such practices, disadvantaging their competitors. This not only erodes the principle of equal opportunity but also hampers the free formation of voter opinions and violates¹⁴⁰ the crucial principle of maintaining a clear distinction between state functions and political party activities.¹⁴¹

Despite a reduction in instances identified as the use of administrative resources compared to previous elections (refer to Chart No. 24), this issue continues to pose a significant challenge.

Chart No. 24

Trends in Cases of Misuse of Administrative Resources



8.6. Potential Voter Bribery and Influence Activities

Under Article 181¹ of the Criminal Code, the act of offering or providing money, goods, services, or any other benefits to influence a voter or supporter to either use or abstain from using their electoral rights during elections is subject to penalties. These penalties include fines ranging from 750 to 1,150 conventional units (equivalent to 37,500 - 57,500 lei) or imprisonment for one to five years. For legal entities involved in such practices, the penalty

¹⁴⁰ [Report](#) on the misuse of administrative resources during electoral processes adopted by the Council for Democratic Elections at its 46th meeting (Venice, 5 December 2013) and the Venice Commission at its 97th Plenary Session (Venice, 6-7 December 2013), pct. 17.

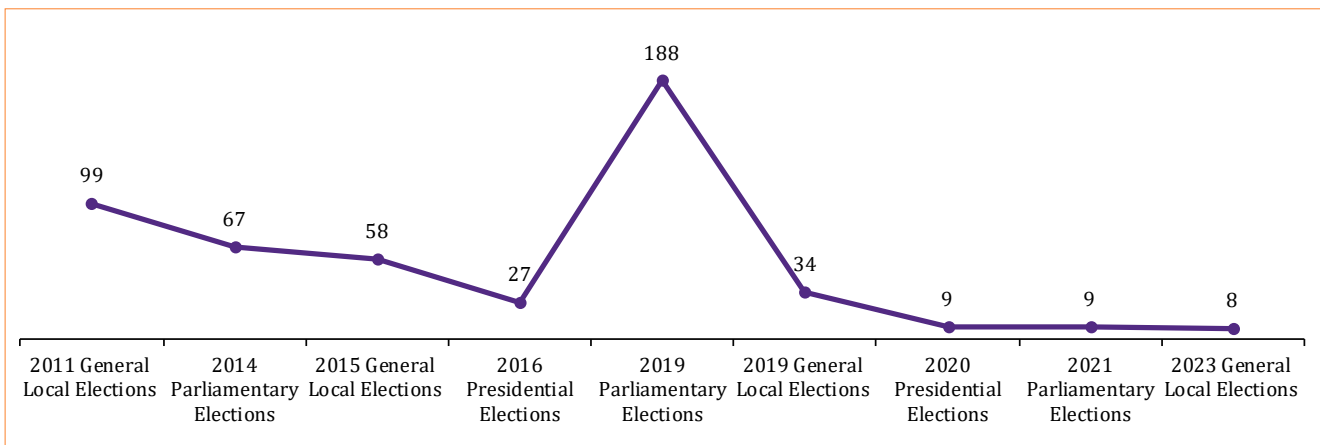
¹⁴¹ Joint [Guidelines](#) for preventing and responding to the misuse of administrative resources during electoral processes, adopted by the Council for Democratic Elections at its 54th meeting, Venice, 10 March 2016 and by the Venice Commission at its 106th plenary session, Venice, 11-12 March 2016.

is a fine of 6,000 to 8,000 conventional units (300,000 - 400,000 lei), coupled with the possibility of being barred from conducting certain types of activities or facing liquidation.

In the context of the 2023 general local elections, the Promo-LEX observation mission identified at least 8 instances that could be categorized as voter bribery. These instances were attributed to various political entities, including 4 cases involving the PȘ, 2 cases related to PAS, and one case each linked to PLDM and the independent candidate Iurie Zagorcea, as detailed in Annex No. 4.

Chart No. 25

Trends in Cases of Potential Voter Bribery



Compared to past elections, there has been a reduction in instances of potential voter bribery. Nonetheless, in the current electoral cycle, the nature of these incidents has become more complex, notably involving public institutions. This complexity, in Promo-LEX's assessment, has heightened both the impact and severity of the cases observed.¹⁴²

Specifically, we highlight the issue regarding the deregistration of the PȘ, which could be deemed as “systemic electoral corruption”. According to the SIS and other relevant public authorities, there were “identified activities aimed at influencing electoral processes across the country”, characterized by the PȘ receiving significantly large sums of financial resources from foreign entities, “utilized by the electoral competitor for illicit financing of the electoral campaign.”¹⁴³

142 Reports No. 2 (p. 27), 3 (p. 26) și 4 (p. 25) of Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 143 [CES Provision](#) No. 92 from 3 November 2023.

8.7. Opinions of Competitors on the Quality of the Electoral Campaign

In the context of applying methodological observation tools, the LTOs conducted a series of interviews with candidates to identify their views on the organization and conduct of the election campaign.

Most of the candidates interviewed characterized the local elections as “generally free, but not always fair.” Opposition competitors, in particular, expressed concerns that the elections were neither free nor fair, citing instances of pressure and intimidation. They argued that they were at a disadvantage compared to incumbent candidates, such as suspended mayors and district presidents, who had better access to and could misuse administrative resources. Trends highlighted by interviewees include misuse of administrative resources by PAS candidates and the utilization of illegal financial sources by the PŞ to attract electoral candidates and influence voters.

All the independent candidates interviewed managed the collection of signatures for their electoral registration personally, and the vast majority did not open an “Electoral Fund” account. They believe this puts them at a disadvantage compared to party-affiliated candidates, who have access to more resources.



CHAPTER IX

FINANCING OF ELECTORAL CAMPAIGNS

9.1. Evolution of the Legal Framework on Campaign Financing

Campaign financing is governed by the Election Code,¹⁴⁴ the Contravention Code,¹⁴⁵ the Criminal Code,¹⁴⁶ the Law on Political Parties,¹⁴⁷ the Law on Advertising,¹⁴⁸ and the Central Electoral Commission (CEC) *Regulation on the Financing of Initiative Groups and Election Campaigns*.¹⁴⁹ The CEC is entrusted with receiving, verifying, supervising, and controlling the financial reports related to campaign financing.

Promo-LEX supported most of the amendments introduced in the revised Electoral Code, which were designed to enhance the control and oversight capabilities. Key changes related to campaign financing included:

- Establishing limits on the amount of state budget funds that can be transferred to the “Election Fund” account;¹⁵⁰
- Increasing the cap on financial contributions that can be transferred to the “Electoral Fund” account from 0.05 to 0.1;¹⁵¹
- Reducing the maximum cash donation to one average national salary (down from three average salaries in the prior version);¹⁵²
- Allowing Moldovan citizens earning income abroad to donate up to six average national salaries, aligning with the limit for those earning within the country, but with a cap of 30% of the donor’s annual income reported for the preceding calendar year;¹⁵³

144 Election [Code](#) of the Republic of Moldova.

145 Contravention [Code](#) of the Republic of Moldova.

146 Criminal [Code](#) of the Republic of Moldova.

147 [Law](#) No. 294 from 21 December 2007 on Political Parties.

148 [Law](#) No. 62 from 17 March 2022 on Advertising

149 CEC [Decision](#) No. 1185 from 18 August 2023 on approving the Regulation on the Financing of Initiative Groups and Electoral Campaigns.

150 Art. 51, para. (10) of the Electoral Code: Political parties which have established initiative groups, electoral blocs of parties and/or have nominated candidates in elections who are entitled to receive allocations from the State budget, shall have the right to transfer to the bank accounts with the reference “Electoral Fund” / “Intended for initiative group” at most 70% of the amounts allocated from the State budget, which are present in the political party’s account at the beginning of the electoral period, complying with the national general ceiling of the funds which may be transferred for each type of elections.

151 Art. 53, para. (1): The general ceiling, at the national level, of funds which may be transferred to the account marked „Electoral Fund” or „Intended for initiative group” represents 0.1 % of the revenues provided for by the Law on the State budget for that year.

152 Art. 57, para. (4), item 1), letter e) shall make cash donations up to one average monthly wage for the year in question.

153 Art. 57, para. (4), item 1), letter a) of the Electoral Code: have the right to donate, during the period of activity of the initiative groups and during electoral campaigns up to 6 average monthly wages for the year in question, but not more than 30 % of their annual income recorded in the preceding calendar year.

- Mandating the submission of financial reports on campaign financing in electronic format,¹⁵⁴ etc.

Under the updated Electoral Code, the CEC only approved the *Regulation on the Financing of Initiative Groups and Electoral Campaigns* on 18 August 2023, which was 11 days after the commencement of the electoral period. This regulation introduced substantial modifications to the structure of campaign finance reports. Despite these changes, the electoral authority did not produce a guide or instructions that would elaborate on and clarify the procedures for filling out these reports.

During the electoral campaign, electoral competitors encountered difficulties in accurately completing and submitting their campaign finance reports, leading to numerous errors. Promo-LEX noted that for some competitors, expenses for identical purposes were inconsistently classified under different expenditure categories. Furthermore, the presence of two distinct and separate categories for similar activities in the reporting form (e.g., item 3.1.7. *Expenditure for the organization of political and electoral activities* and 3.1.14. *Expenditure for the organization of meetings, public events, seminars, and/or training courses within the country*) significantly hindered the accurate recording of incurred expenses.

The format for submitting the final income and expenditure report posed another challenge. The legal framework requires that within three days following the election day (Wednesday), competitors must submit their final report covering the entire campaign period. However, due to the submission format requested by the CEC for the general local elections (Final Report Round I + II), the total reported income and expenses by the electoral competitors were artificially inflated compared to the actual figures. For instance, in the case of PDCM,¹⁵⁵ the total campaign income matched the incurred expenses, amounting to 1.4 million lei. Yet, under the TOTAL income and expenditure section, the figure was erroneously reported as 2.8 million lei for this competitor.

In this context, we recommend the CEC to ensure the adoption of the relevant normative acts for the elections in due time, before the start of the electoral period, in order to effectively familiarize stakeholders with the established rules. We also recommend the development of a guide/guidelines detailing the expenditure lines in the financial reports and the types of expenditure that can be attributed to the corresponding lines. In addition, we consider it necessary to exclude from the model reporting forms expenditure lines which leave it to the discretion of competitors to present the same expenditure under different expenditure lines.

9.2. Regulating Campaign Financing for General Local Elections

During the election period, the CEC adopted a number of decisions regulating the conditions of campaign financing, as follows:

- » *Determining the amount of interest-free credit granted to electoral competitors in the general local elections of 5 November 2023*¹⁵⁶.

For each political party/electoral bloc, the CEC set the amount of 50,000 lei, and for each independent candidate - 10,000 lei. We note that despite the evolution of the economic situation in the Republic of Moldova, as well as the significant increase in inflation, the

154 Art. 58, para. (5) of the Electoral Code: Reports on the financing of political parties, initiative groups and electoral campaigns must be presented compulsorily, by automated reporting electronic means, through the IT subsystem "Financial Control", part of the State Automated Information System "Elections" and, at the request of the Central Electoral Commission - on paper support.

155 PDCM Final [Reportul](#) on Campaign Financing for the November 5, 2023 General Local Elections.

156 CEC [Decision](#) No. 1217 of 8 September 2023 on determining the amount of interest-free credit granted to electoral competitors in the general local elections of 5 November 2023.

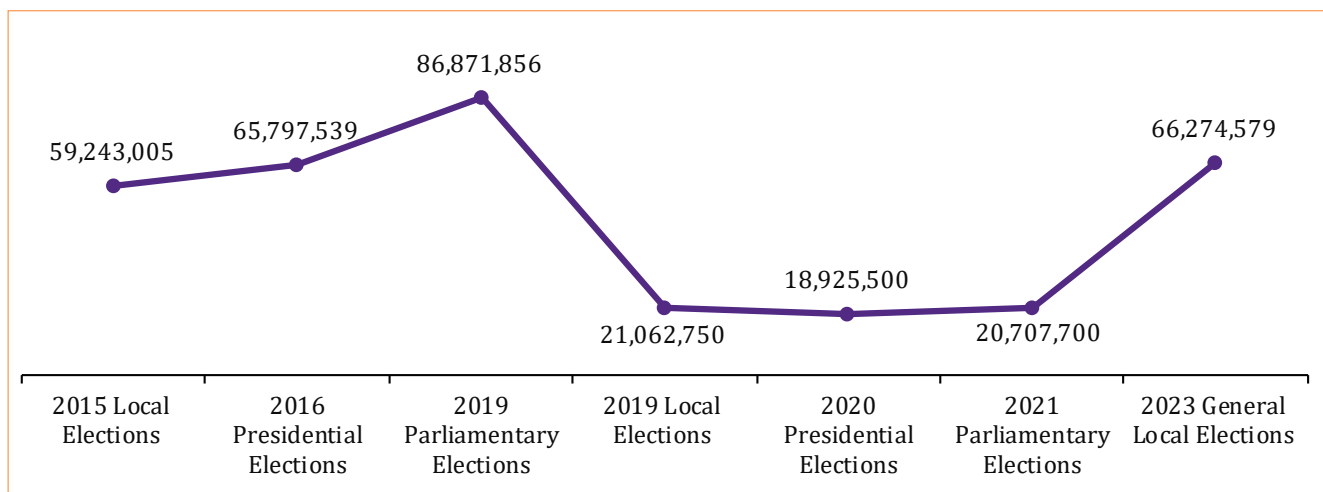
approved credit limits for electoral competitors remained unchanged, the credit has been constant since 2019. According to Promo-LEX, the low amount of interest-free credit could explain the unpopularity of this tool for financing the electoral campaign (only three electoral competitors made use of this source of financing - PDCM, MAN and IC Roman Slobozeanu).

» *Establishing the general ceiling of funds that can be transferred to the “Election Fund” account for the general local elections of 5 November 2023¹⁵⁷.*

In line with Article 53, para. (5) of the Electoral Code, the CEC has defined the upper limit of financial resources that electoral competitors can transfer to their ‘Electoral Fund’ accounts for the general local elections held on 5 (19) November 2023. This ceiling, designed to ensure equitable campaign financing, has been capped at 66,274,579 lei, equivalent to 0.1% of the state budget (refer to Chart No. 26).

Chart No. 26

Ceilings Evolution for Financial Transfers to the “Electoral Fund” Account (Lei)



We thus observe that, due to modifications in the legal framework, the total cap on funds transferable to the “Election Fund” account has seen a considerable increase compared to the past three national elections. Although these increased limits may motivate competitors to accurately account for all expenses without fear of quickly reaching these caps, Promo-LEX believes that, given that the 0.05% threshold has not been met by any electoral competitor since 2019 in national elections, the raise to 0.1% appears overly ambitious. This is particularly true considering the economic situation in the Republic of Moldova, where the minimum wage in 2023 was merely 4,000 lei, and the average wage was 11,700 lei.

Furthermore, in the context of the current elections, the combined income of all electoral competitors who provided information to the electoral authorities - comprising 32 political parties and 48 independent candidates - fell short of this increased limit. The total income reported by electoral competitors during the 2023 general local elections amounted to 37.6 million lei.

¹⁵⁷ CEC [Decision](#) No. 1219 of 8 September 2023 on the establishment of the general ceiling of funds that can be transferred to the “Election Fund” account for the general local elections of 5 November 2023.

9.3. Financial Reporting and Process Management by the Electoral Body¹⁵⁸

9.3.1. Financial Reporting by Electoral Competitors to Electoral Bodies

The financial reporting process for election competitors includes several steps as follows:

- » *Nomination and presentation for confirmation of the person responsible for finance (treasurer)¹⁵⁹.*

Out of the 36 political parties that nominated candidates, only 5 of them¹⁶⁰ did not confirm to the CEC the person in charge of finance (treasurer) - see Annex 5.

- » *“Electoral Fund” account opening¹⁶¹.*

According to the information available on the CEC’s website, out of the 36 political parties that nominated candidates, 6 did not notify or open an “Electoral Fund” account¹⁶² (refer to Annex No. 5). Regarding the independent candidates, as per the CEC’s website, only 53 (approximately 5%) out of 1,174 registered ICs opened an “Electoral Fund” account (see Annex No. 5).

As observed in previous elections, several political parties (such as PACE, PŞ, PONA, etc.) encountered difficulties when attempting to open the “Electoral Fund” account due to the refusal of commercial banks to provide this service. Promo-LEX has consistently pointed out, as in past elections, that when banks refuse to open an account or impose restrictions on a political party’s account, they effectively limit the party’s operations, including its right to participate in elections, even though no legal violations have been identified. Furthermore, the refusal by banks to open an account for an electoral competitor not only infringes upon the political entity’s operational rights but also restricts a citizen’s right to be elected, without any legal basis for such restrictions.¹⁶³

- » *Submission of the financial report at the beginning of the campaign by political parties intending to transfer own financial means to the “Election Fund” account¹⁶⁴.*

Based on the information available on the CEC’s website, 16 political parties provided their financial reports at the onset of the campaign period¹⁶⁵ (refer to Annex 5 for details). Despite this, there were 5 political parties¹⁶⁶ that failed to submit an initial campaign financial report, though the records reveal that these parties had already transferred funds to their “Electoral Fund” account from their existing accounts, which included financial resources derived from both private and public sources.

- » *Reporting on income accrued and expenses incurred in the electoral campaign¹⁶⁷.*

In alignment with the CEC Calendar Programme¹⁶⁸ for the 2023 general local elections, starting from 6 October 2023, electoral competitors were obligated to submit financial reports on a weekly basis to the CEC, or, for Initiative Groups (IC), to the appropriate District Electoral Council (DEC).

158 The present report analyses the data available up to 19.12.2023.

159 Art. 55, para. (1) of the Electoral Code.

160 FASM, PACE, PPBN, PPPPN and PPRM.

161 Art. 56, para. (1) of the Electoral Code.

162 FASM, NOI, PACE, PPBN, PPPPN and PPRM.

163 [Report No. 4](#). Election observation mission for the President of the Republic of Moldova on 1 November 2020..

164 Art. 57, para. (3) of the Electoral Code.

165 CC, LOC, MAN, MPSN, PAS, PCRM, PL, PLDM, PN, PPF, PPM, PPPDA, PPVP, PSDE, PSRM and PVE.

166 ALDE, PDCM, PNL, PNM and PS

167 Art. 58, para. (3) of the Electoral Code.

168 [Calendar Programme](#) for the organisation and conduct of the general local elections on 5 November 2023.

As per the details available on the CEC's official website, among the 36 political parties that fielded candidates, 32¹⁶⁹ submitted at least one report detailing their campaign financing (refer to Annex No. 5 for more information). Three political parties, namely NOI, PPBN, and PPPPN, notified the CEC that they would not incur any financial expenditures for election campaign activities. Regarding the Party of Regions of Moldova (PPRM), there was no submission of information regarding their election campaign's financial conduct.

Concerning systematic reporting, it was observed that 27 political parties¹⁷⁰ consistently submitted their weekly financial reports/relevant information, including the final report, whether within the stipulated timeframe or past the deadline.¹⁷¹ On the other hand, 5 political parties¹⁷² provided their reports sporadically, approximately every 2 to 3 weeks (refer to Annex 5 for details).

Among the 1,141 registered ICs, 53 that established an "Electoral Fund" account, as indicated on the CEC's official website, 49 ICs¹⁷³ submitted at least one report detailing their campaign financing (refer to Annex No. 5 for more information). For 4 ICs¹⁷⁴, there is no available information on the electoral authority's website regarding their campaign conduct. Additionally, 632 ICs (55%), who did not create an "Election Fund" account, reported to the electoral bodies on their campaign activities that did not involve financial expenses.¹⁷⁵ Thus, it is observed that 456 (40%) of the registered ICs have not disclosed any details on their campaign financing and conduct.

It is important to note that, as per Article 48¹ of the Contravention Code, failing to submit or late submission of electoral campaign financing reports by electoral competitors may result in penalties, including a warning or a fine ranging from 90 to 300 conventional units (equivalent to 4,500 - 15,000 lei).

9.3.2. CEC Management of the Financial Reporting Process

Throughout the election period, the CEC was responsible for overseeing and regulating the campaign financing of candidates participating in the general local elections. Based on this activity, several observations can be made:

» *Virtually no penalties, with the exception of warnings, were imposed on electoral competitors for infractions related to the campaign finance reporting process.*

In the context of the general local elections, the CEC made six decisions¹⁷⁶ through which it conducted both qualitative and quantitative analyses of the financial reports submitted by electoral competitors. Generally, the CEC's response was to issue warnings or summonses to electoral competitors, urging them to adhere to legal requirements (in some instances,

169 PSDE, PCRM, MPSN, PL, PSRM, PVE, PN, PPN, PNL, PLDM, PPM, PPDA, ALDE, PR, PPPDA, PPF, PAS, PPVP, CC, PDMM, PACE, PONA, PS, PDCM, PȘ, FASM, CUB, MAN, PNM, LOC, MRM and BE Ruslan Codreanu.

170 ALDE, CC, CUB, FASM, LOC, MAN, MPSN, MRM, PAS, PCRM, PDCM, PDMM, PL, PLDM, PN, PNM, PPDA, PPM, PPN, PPPDA, PPVP, PR, PS, PSDE, PSRM, PȘ and PVE.

171 For example, in the case of FASM - the campaign finance reports for the period 6 October to 8 November 2023 (6 reports) were all submitted on the same day, 30 November 2023.

172 BE Ruslan Codreanu, PACE, PNL, PONA and PPF.

173 IC Guțan Valentin, IC Burlea Ion, IC Sîrbu Sergiu, IC Cebotaru Sergiu, IC Slobozeanu Roman, IC Costiuc Nina, IC Malu Vladimir, IC Jizdan Vadim, IC Rusu Tatiana, IC Icmpeș Valentin, IC Urechean Radu, IC Dandiș Nicolae, IC Moruz Dmitri, IC Musteață Valeriu, IC Nasulea Ion, IC Vdovicenco-Minicuna Snejana, IC Guzun Ion, IC Țurcanu Ion, IC Bivol Cristina, IC Belicug Ivan, IC Tureac Alexandru, IC Zavroțchii Dmitrii, IC Buzu Nicolae, IC Marahovschi Victor, IC Nița Victor, IC Cuzuioac Ghenadie, IC Mursa Olga, IC Jardan Viorel, IC Damian Nicolae, IC Gaina Tamara, IC Vrabie Vitalie, IC Filimon Ion, IC Lipcan Pavel, IC Timofti Nicolae, IC Dudoglo Nicolai, IC Anastasov Serghei, IC Chiulafî Serghei, IC Levintii Dmitrii, IC Gheorghiu Veaceslav, IC Topal Anatoli, IC Carapirea Nicolai, IC Uzun Anatoli, IC Zlatovcen Ivan, IC Garizan Oleg, IC Fucedji Vadim, IC Capsamun Vasili, IC Chiosea Ilia, IC Chiuc Piotr and IC Topicu Fiodor.

174 IC Negru Fiodor, IC Breahna Pavel, IC Belicug Ivan and IC Ipolitov Nicolae.

175 [List](#) of ICs for the general local elections of 5 November 2023 who have not opened an "Election Fund" account.

176 Decisions No. [1495](#), [1541](#), [1551](#), [1589](#), [1632](#) and [1817](#) on the supervision of income and expenditure of electoral competitors in the electoral campaign for the general local elections of 5 November 2023.

this was done repeatedly). For the most part, electoral competitors responded to these requests by providing the necessary information or by addressing and rectifying the inconsistencies identified by the CEC, such as failing to submit all required types of reports, submitting reports past legal deadlines, or violating regulations on campaign financing.

However, on the basis of the supervision and control decisions, the CEC also applied the sanction in the form of a warning to 9 electoral competitors, as follows: PVE, PPM, PPPDA, FASM (2), PPPPRM (2), PACE, MPSN, NOI and BE Ruslan Codreanu.

In the case of FASM, for which two sanctions in the form of a warning were applied, we note that, by CEC Decision No. 1643 of 28 November 2023¹⁷⁷, it was found that undeclared material funds in the amount of 31,475 lei were used, equivalent to 5.14% of the admissible expenditure ceiling for DEC Orhei. According to Art. 102, para. (5) of the Electoral Code, this violation is sanctioned with the cancellation of the registration of the electoral competitor. However, taking into account the date of adoption of the decision - 28 November 2023 (23 days after the election day of 5 (19) November 2023, when the FASM candidate won in the first round), the CEC found it impossible to apply the sanction provided for in Art. 102, para. (5), letter (a) of the Electoral Code.

In the context mentioned, CEC Decision No. 1560, dated 9 November 2023 (four days after the first election round),¹⁷⁸ revealed that undeclared and unaccounted material funds had been utilized in the campaign finance reports by FASM for promoting its nominee for mayor of Balti Municipality. However, the estimated amounts by the electoral authority did not surpass 1% of the allowed expenditure limit for DEC Balti.

Consequently, FASM received a warning as a sanction. It is observed that, by the end of the electoral period, FASM faced three warnings as sanctions, and a more severe penalty, namely the cancellation of the registration of the electoral competitor for the mayor of Orhei city, could not be imposed.

» *Initiation of a comprehensive control of the financing of the election campaign of the candidate PȘ.*

By Decision No. 1550 of 8 November 2023,¹⁷⁹ five days after the exclusion of the PȘ from the electoral race by the decision of the CES, the CEC ordered the initiation of a comprehensive control mission on the financing of the electoral campaign of the PȘ for the entire reporting period for the general local elections of 5 November 2023.

According to legal provisions,¹⁸⁰ the notification about the initiation of an audit on an electoral competitor is also published on the official website of the CEC, under the section "Financial Control of Initiative Groups and Electoral Campaigns" (as per Regulation, point 110). Following this, the audit report is to be ratified during a public session of the CEC (Rule 118). On January 23, 2024, the CEC disclosed on its official website the *Report on the Comprehensive Audit of Campaign Financing for the "CHANCE" Political Party in the general local elections of November 5, 2023*¹⁸¹. The report indicated that the audit could not be fully completed due to the failure of the party and certain relevant authorities to submit the

177 [CEC Decision](#) No. 1643 of 28 November 2023 on complaints No. CEC-7/10682 of 21 November 2023 from Mr. Sergiu Stanciu, candidate for mayor of Orhei municipality, nominated by the Political Party "Action and Solidarity Party", and No. CEC-7/10856 of 23 November 2023 from the Security and Intelligence Service.

178 [CEC Decision](#) No 1560 of 9 November 2023 on preliminary objection No CEC-7/9681 of 5 November 2023 (CECE-2/S-27 of 4 November 2023) of Mr. Nicolai Grigorshin.

179 [Decision](#) No. 1550 on conducting a complex control of the financing of the electoral campaign of the electoral competitor "CHANCE" political party for the general local elections of 5 November 2023.

180 [Regulation](#) on the Financing of Initiative Groups and Electoral Campaigns, approved by CEC Decision No 1185 of 18 August 2023.

181 [Report](#) on conducting a complex control of the financing of the electoral campaign of the electoral competitor "CHANCE" political party for the general local elections of 5 November 2023.

necessary documents. A follow-up audit is planned, pending the report's ratification in a forthcoming CEC session. This report was officially ratified on February 14, 2024.

» *Enhancing the Transparency of Electoral Campaign Financing for Competitors.*

Based on Article 58, para. (8) of the Electoral Code, the CEC is shall to publish campaign finance reports on its official website within 24 hours after their receipt and acceptance. Similarly, district electoral councils, upon receiving financial reports from ICs, are required to forward these reports to both the CEC and the relevant LPAs for publication on their official websites. Furthermore, paragraph 81 of the *Regulation on the financing of initiative groups and election campaigns* stipulates that these financial reports should be published in a reusable format to facilitate straightforward data processing.

For the first time in the context of the general local elections, the CEC and subordinate electoral bodies have undertaken significant efforts to enhance the transparency of campaign financing by ICs. Additionally, this marked the first occasion the CEC attempted to facilitate the publication of financial reports in a more reusable format. While retaining the PDF format, efforts were made to enable conversion to more data-friendly formats. However, this approach has resulted in data loss, inconsistent conversion of information, and difficulties in the easy reuse of the data. Consequently, it is recognized that there are ongoing challenges in this area, and continued efforts are necessary to ensure the efficient functionality of this process.

Thus, it was noted that during the electoral campaign, the CEC published the financial reports beyond the legally mandated deadline. Moreover, the format chosen for these publications does not align with open data principles.

Additionally, in the case where financial reports were published in a format deemed by the CEC as reusable, these formats failed to display the submission deadlines of the reports. This omission is particularly critical since the legal framework prescribes sanctions for electoral competitors who fail to submit their financial reports on time. Consequently, without access to this information, stakeholders are unable to ascertain compliance with submission deadlines. Moreover, discrepancies were observed in the information provided by competitors across different reports, even though no updates to the reports were published in the interim.

In light of the above, we urge the CEC to address the identified shortcomings to enhance the transparency of campaign financing and to bolster civil society's trust in the transparency and fairness of electoral processes.

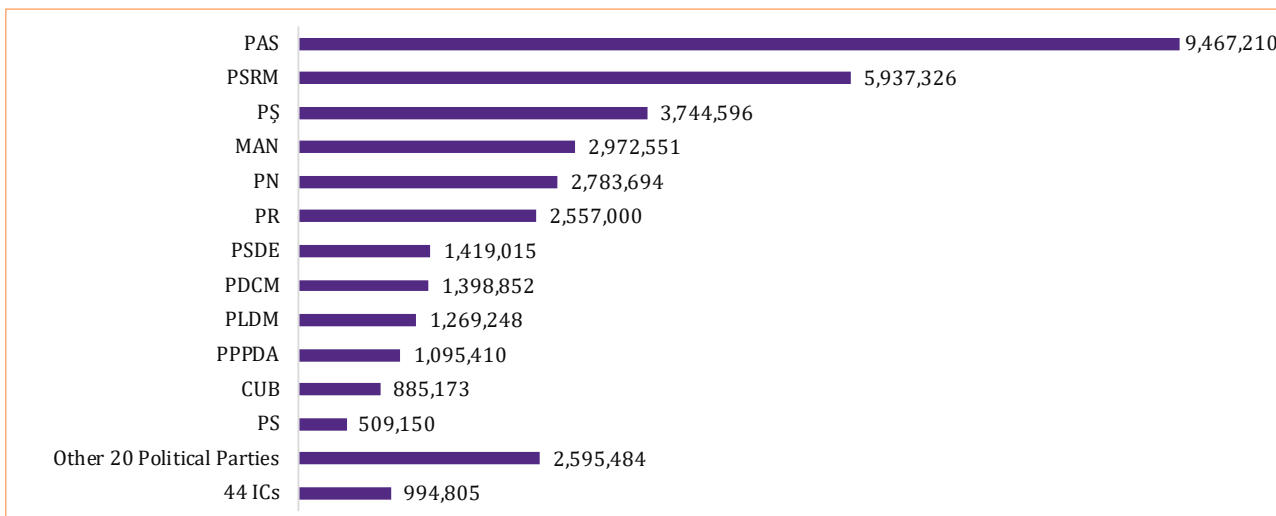
9.4. Income and Expenditure Reported by Electoral Contestants to the CEC

9.4.1. Reported Revenues and their Source

According to the official CEC website, 32 political parties and 44 ICs declared total revenues of 37,629,514 lei, with 2,802,546 lei coming from in-kind donations (refer to Annex 6). In the case of the other competitors who submitted reports, they did not report accumulated revenues.

The majority of reported revenues were attributed to PAS at 25%, followed by PSRM with 16%, PȘ - 10%, MAN - 8%, and both PN and PR each reported 7%. (refer to Chart No. 27). Thus, it is observed that 73% of the total declared revenues were accounted for by 6 political parties, while the remaining 27% of reported revenues were spread across the other 70 electoral competitors (comprising 26 political parties and 44 ICs).

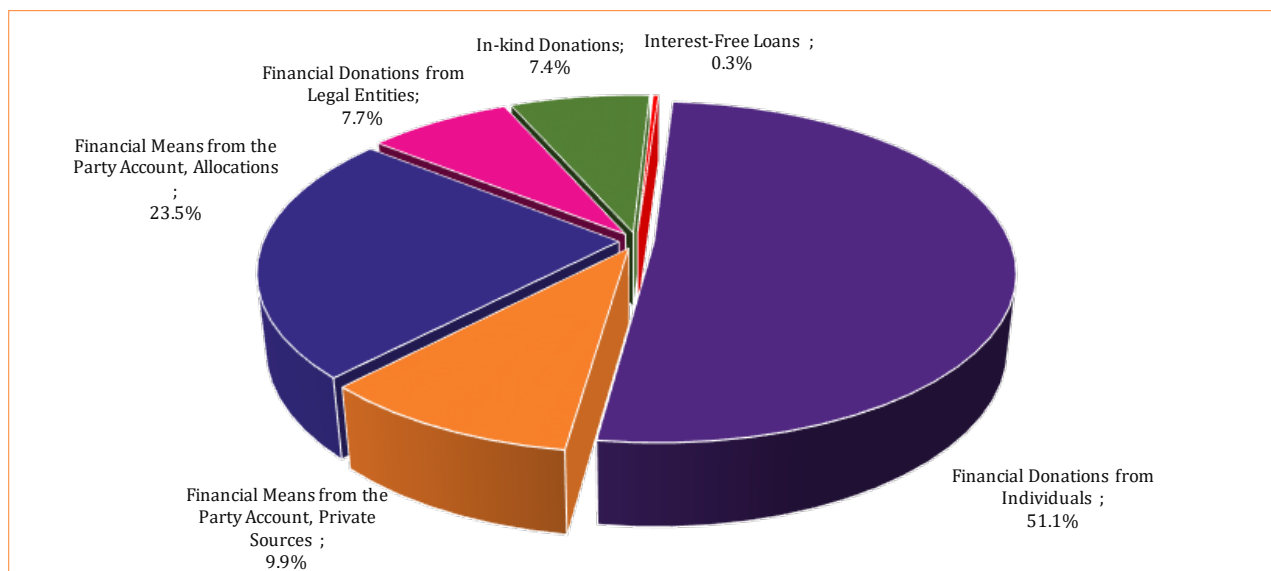
Reported Revenues of Electoral Competitors



Based on the source of income, the following distribution is observed (refer to Chart No. 28):

- **33.5%** of the revenues (12.6 million lei) are financial means transferred from the current accounts of political parties to the “Electoral Fund” account. Out of this, 70% (8.8 million lei) was from state budget allocations, reported by 12 parties, and 32% (3.7 million lei) came from private sources, reported by 11 parties.
- **51.1%** (19.2 million lei) was from private income (donations) reported by 26 political parties and 39 ICs.
- **7.7%** (2.8 million lei) were from financial donations from legal persons, reported by 12 political parties and 3 ICs.
- **0.3%** (110 thousand lei) were from interest-free loans, reported by 3 electoral competitors (PDCM, MAN, and IC Roman Slobozianu).
- **7.4%** (2.8 million lei) were from in-kind donations, reported by 15 political parties and 1 IC.

Declared Income Sources of Electoral Competitors



During the electoral campaign, Promo-LEX observed the accumulation of revenues by political parties in contradiction to legal provisions totaling 1,052,970 lei (refer to Annexe No.7), with the following violations identified:

- Art. 57, para. (4), item 1), letter e) of the Electoral Code, which mandates that individuals may make cash donations up to an average salary on the economy, equating to 11,700 lei. The amount accumulated non-compliantly was 200,250 lei.
- Art. 54, para. (5) of the Electoral Code, which prohibits the financing or material support in any form of electoral campaigns by legal entities that, in the last three years before the start of the electoral period, have concluded public procurement contracts for works, goods, or services as defined by Law No. 131/2015 on public procurement. The non-compliantly accrued revenue amount was 50,144 lei;
- Art. 57, para. (4), item 1), letter a) of the Electoral Code, which allows individuals to donate to initiative groups and electoral campaigns up to 6 average monthly salaries on the economy established for that year, but not more than 30% of their annual income recorded for the previous calendar year. The non-compliantly accumulated amount was 66,054 lei (IC Vitalie Vrabie);
- Art. 57, para. (4), item 2), letter c) of the Electoral Code, which stipulates that for donations to support electoral campaigns, legal entities must provide electoral competitors with information issued by the State Tax Service confirming the absence of arrears to the budget. The amount of non-compliantly accumulated revenues was 736,522 lei.

In instances of violations related to the first two provisions, following verifications by the CEC, electoral competitors were predominantly instructed to transfer the inappropriately accumulated revenues to the state budget. However, for the last cited provision regarding donations from legal entities with registered arrears to the state budget, the CEC did not make any determinations. Promo-LEX posits that such donations should also be redirected to the state budget.

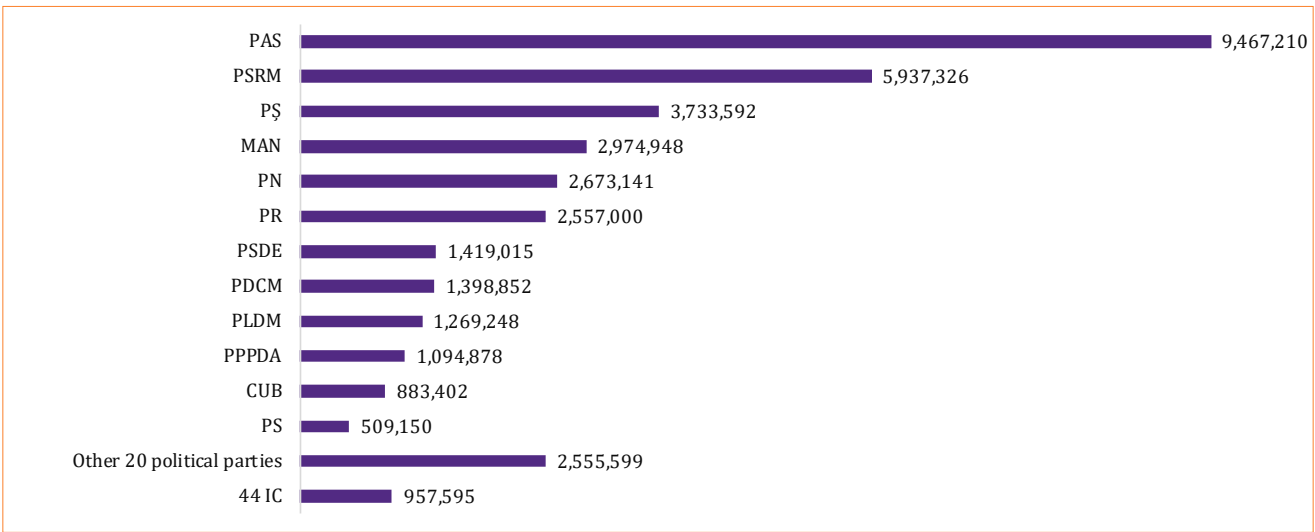
Furthermore, the electoral authority did not adopt a decisive stance on cash donations received by the PSRM that exceeded the limit of one average salary. The justification provided was that these funds were directly deposited by donors into the “Electoral Fund” account via bank counters. Promo-LEX challenges this interpretation, arguing that treating these operations as bank transfers rather than cash donations undermines the intent of the regulation limiting cash contributions. Promo-LEX contends that depositing cash directly into the “Election Fund” account at bank counters does not sufficiently verify the funds’ origin. Consequently, Promo-LEX suggests that such deposits should be considered cash donations and not bank transfer donations, highlighting concerns over the transparency and accountability of campaign financing practices.

9.4.2. Financial Expenditure Declared and its Destination

According to the CEC’s official website, 32 political parties and 44 CIs disclosed total expenditures amounting to 37,499,809 lei, with 2,773,546 lei of that being attributed to in-kind donations (see Annex 8). The PAS accounted for the highest share of these expenses at 25%, followed by PSRM - at 16%, PŞ - 10%, MAN - 8% and 7% each - for PN and PR (see Chart No.29). As for the income, we find that 6 political parties reported 73% of the total declared expenses, and the other 70 electoral contestants - only 27% of the expenses (24 political parties and 44 ICs).

Chart No. 29

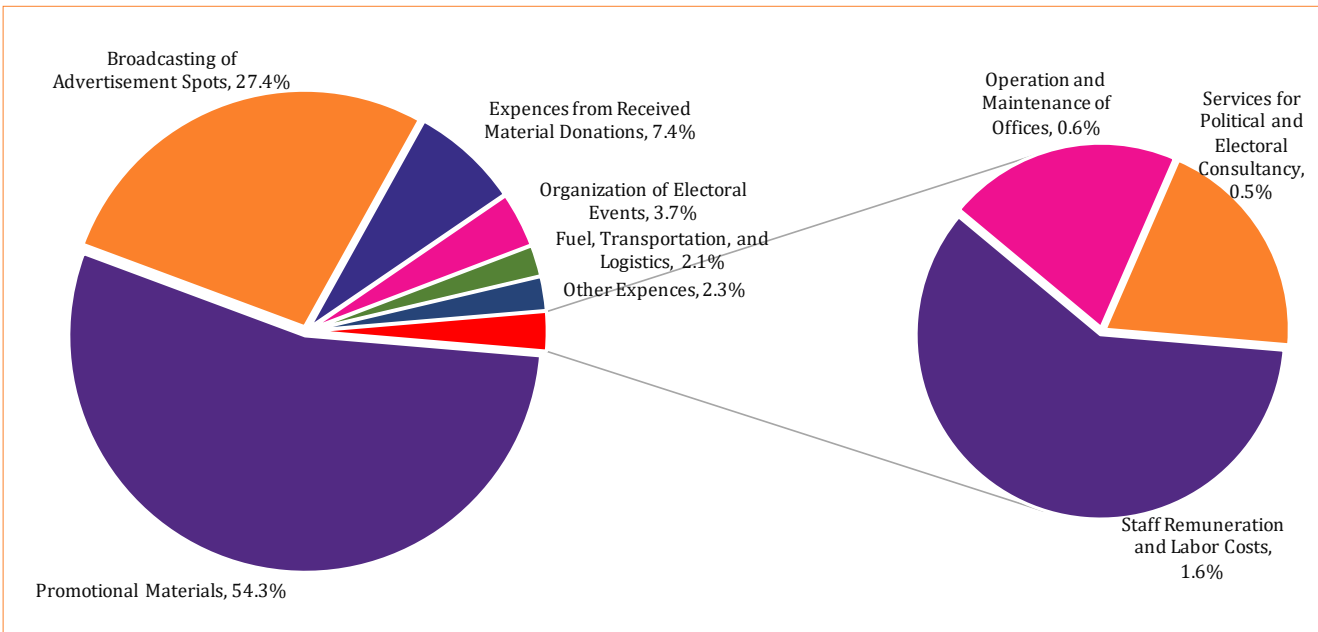
Reported Expenditures of Electoral Competitors



Based on the expenditure reports, the majority of spending was allocated to the production of promotional materials, such as newspapers, posters, vests, banners, pens, etc., accounting for 54.3% of total expenditures. This was followed by costs associated with the production and broadcasting of advertising spots, including street billboards, radio, TV, and internet advertising, etc. which represented 27.4% of the expenditure. Additionally, 7.4% of the expenditures were attributed to material donations (refer to Chart No. 30).

Chart No. 30

Purposes of Reported Expenditures by Electoral Competitors



9.5. Civic Monitoring of Campaign Financing

Based on reports from Promo-LEX observers, the campaign expenses of electoral competitors during the electoral period were estimated. These estimated expenses were then compared with what was declared to the CEC in their campaign financing reports. The methodology for estimating expenses involved applying the minimum market prices for services, goods, and works utilized by competitors for campaign purposes.

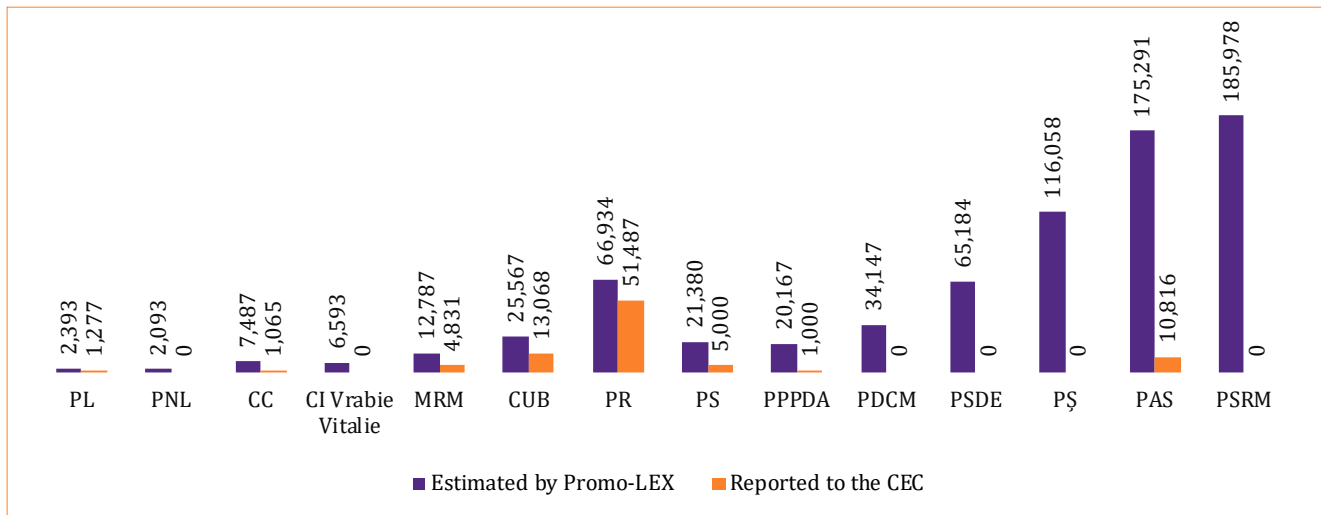
It is important to note that these prices were uniformly applied across all electoral competitors. Consequently, it's acknowledged that there might be discrepancies between the costs applied by Promo-LEX and those reported by the competitors, affecting both financial expenses and expenses from material donations.

9.5.1. Estimated Expenditure on Rental, Maintenance and Operation of Offices, including Telecommunications

Promo-LEX observers reported that at least 19 electoral contestants utilized offices and telecommunication services during their campaign. For 14 of these competitors, Promo-LEX identified unreported expenses amounting to at least 653,515 lei, as illustrated in Chart No. 31. For the remaining contestants not highlighted in the charts, the estimated expenses did not surpass the amounts they had reported to the CEC. This method of estimation applies to all subsequent expenditures discussed.

Chart No. 31

Estimated Expenses for Rental, Maintenance, and Operation of Offices, Including Telecommunications



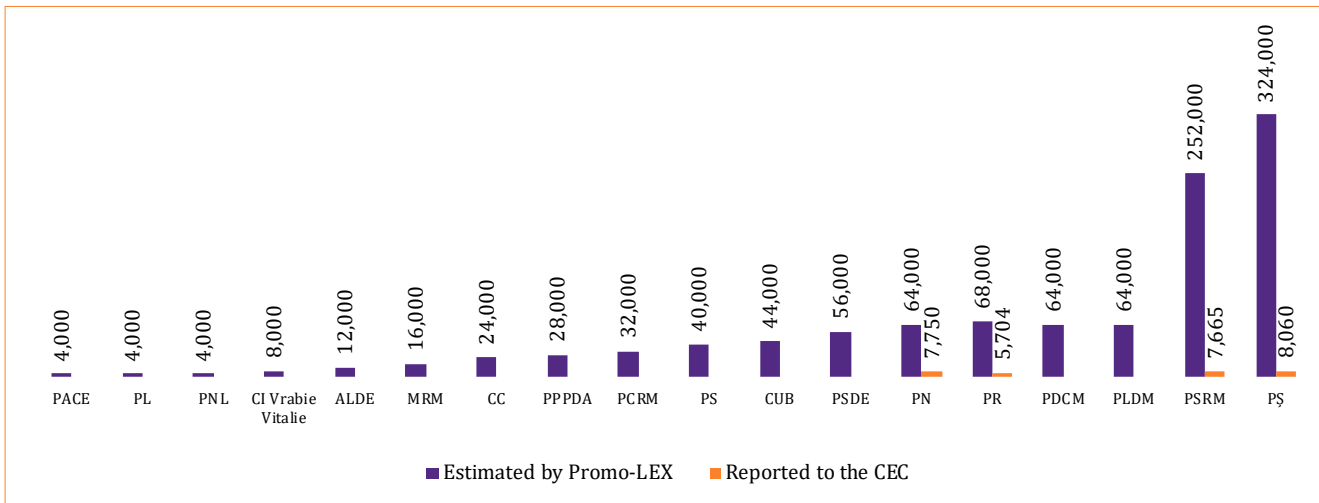
The highest estimated unreported expenses for offices, including telecommunications, were for PSRM (185,978 lei), followed by PAS (164,475 lei) and PȘ (116,058 lei).

9.5.2. Estimated Labor Compensation Expenses (Staff Costs)

Based on observations from Promo-LEX, at least 19 electoral competitors employed staff members for their election campaigns. For 18 of these competitors, it was estimated that there were unreported expenses amounting to at least 1,078,821 lei (refer to Chart No. 32).

Chart No. 32

Estimated Labor Compensation Expenses



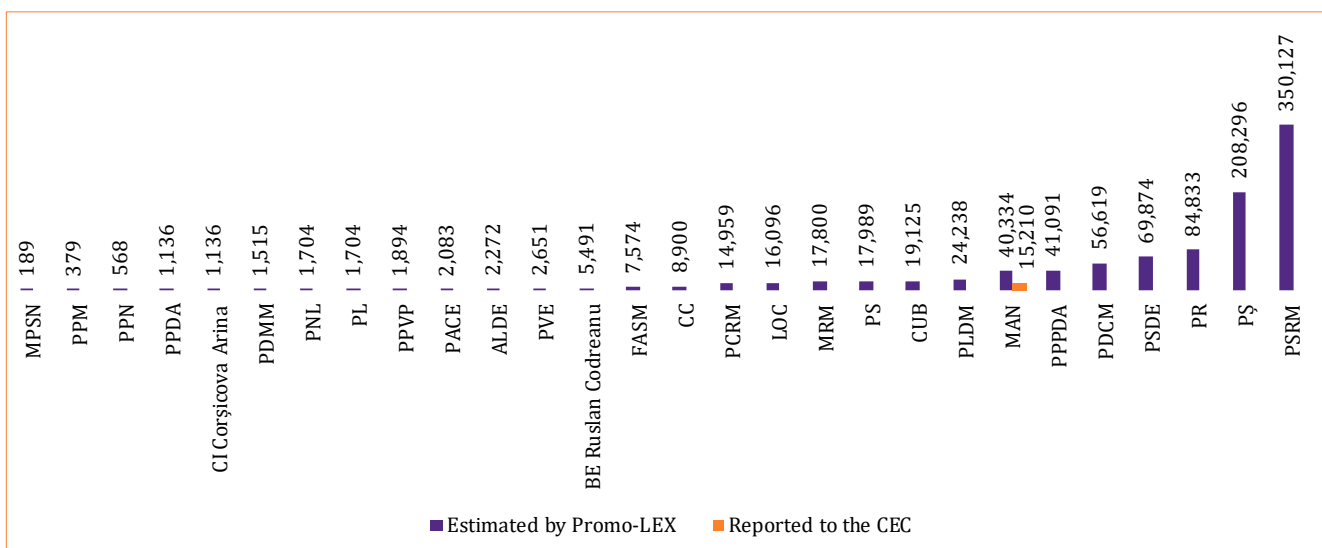
The highest unreported labor remuneration expenses were recorded for PŞ (315,940 lei), followed by PSRM (244,335 lei), and PDCM (64,000 lei).

9.5.3. Estimated Expenditures for Campaign Volunteers/Canvassers Incentives

During the election campaign, Promo-LEX observers noted campaign activities involving campaign canvassers (distributing election materials) and representatives of electoral competitors (estimations made for election day only) for at least 31 competitors. For 28 of these, unreported expenses were estimated to be at least 985,368 lei (see Chart No.33). These estimations were based on the country’s minimum wage¹⁸², applying a rate of 23.67 lei per hour (189.36 lei per day, 4,000 lei per month).

Chart No. 33

Estimated Expenditures for Campaign Volunteers/Canvassers Incentives



182 Government Decision No 670 of 29 September 2022 on setting the amount of the minimum wage in the country.

The most unreported expenses for volunteer/canvasser rewards were estimated for PSRM (350,127 lei), PŞ (208,296 lei), and PR (84,833 lei).

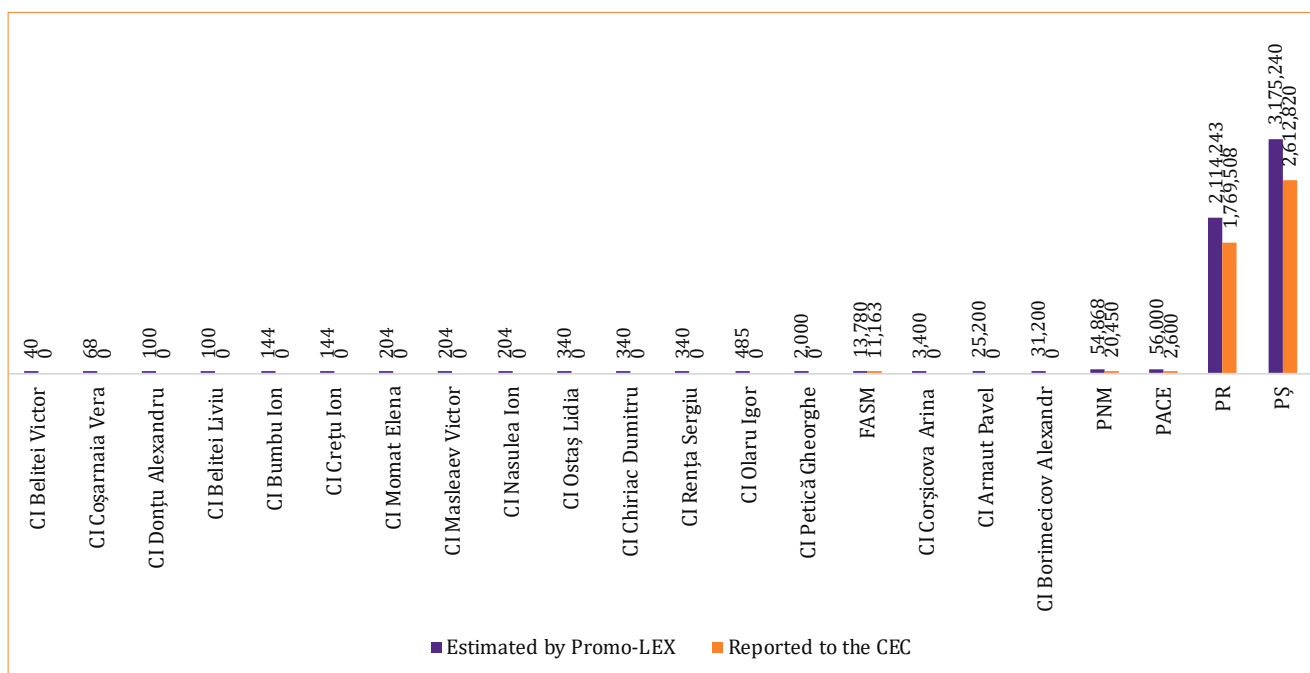
Regarding the involvement of canvassers and the reporting of their activity expenses, inconsistencies in financial reports were observed upon verification. Although the involvement of volunteers was reported by some competitors (PSRM, PPDA, PS, LOC, MRM, and BE Ruslan Codreanu), the estimated expenses for their activities were listed as “zero”. In contrast, other competitors (PNM) reported these expenditures as financial expenses. Therefore, we reiterate the necessity for the CEC to develop a guide or instructions on how to complete campaign finance reports accurately.

9.5.4. Estimated Expenses for Promotional Materials

According to Promo-LEX observers, electoral competitors used promotional materials (newspapers, flyers, banners, video spots, visibility materials, etc.) Based on the information observed, unreported expenses for 22 electoral competitors were estimated to be at least 1,062,103 lei (see Chart No. 34).

Chart No. 34

Estimated Expenses for Promotional Materials



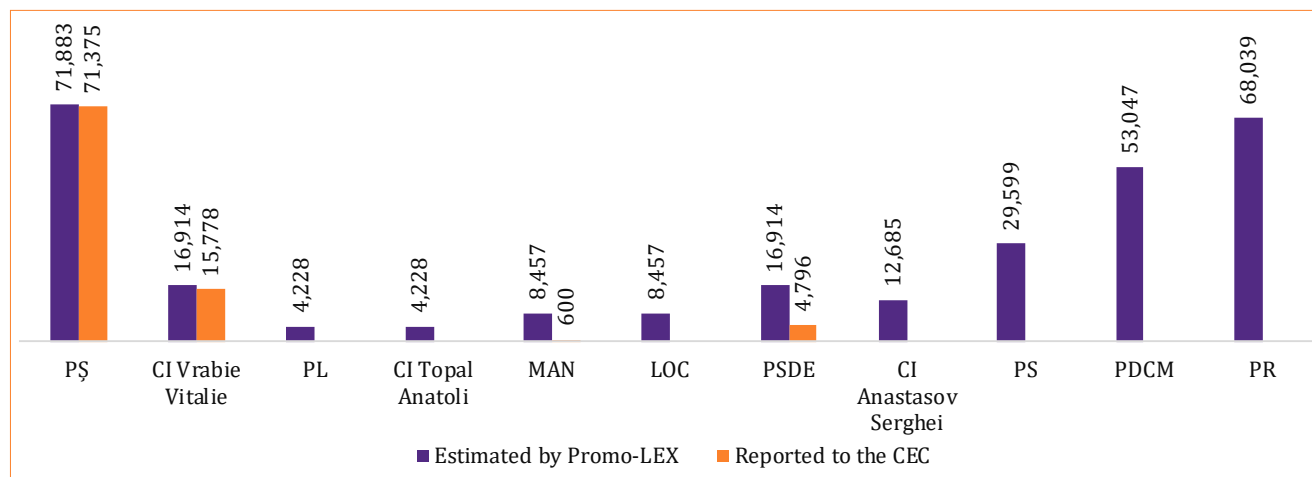
The most unreported expenditure was estimated for PŞ (562,420 lei), PR (344,735 lei) and PACE (53,400 lei).

9.5.5. Estimated Expenses for Advertising Space and Fixed or Mobile Advertising Devices

Promo-LEX observers reported on the use of street advertising by electoral contestants. On the basis of the reports received from them, unreported expenses were estimated for 11 electoral competitors amounting to at least 201,902 lei (see Chart No. 35).

Chart No. 35

Estimated Expenses for Advertising Space and Fixed or Mobile Advertising Devices



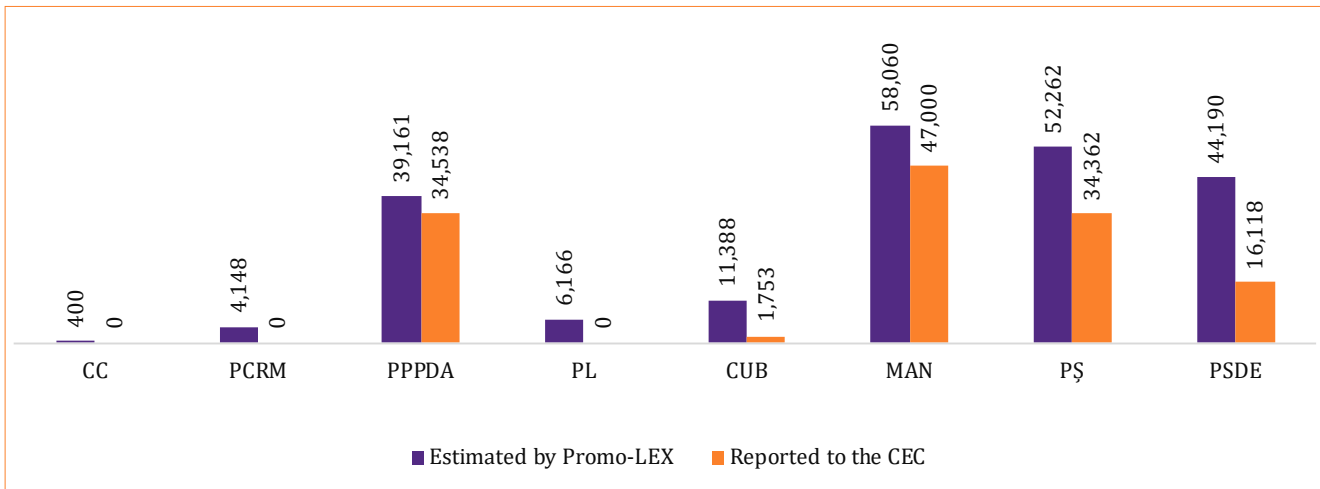
The most unreported expenditure for advertising space and fixed or mobile advertising devices (street advertising) was estimated for PR (68,039 lei), PDCM (53,047 lei) and PS (29,599 lei).

9.5.6. Estimated Expenses for Internet Advertising

During the monitored period, the use of internet advertising through live broadcasting of various events organized for electoral promotion was observed. Consequently, unreported expenses for 8 electoral competitors were estimated to be at least 82,006 lei (see Chart No. 36).

Chart No. 36

Estimated Expenses for Internet Advertising



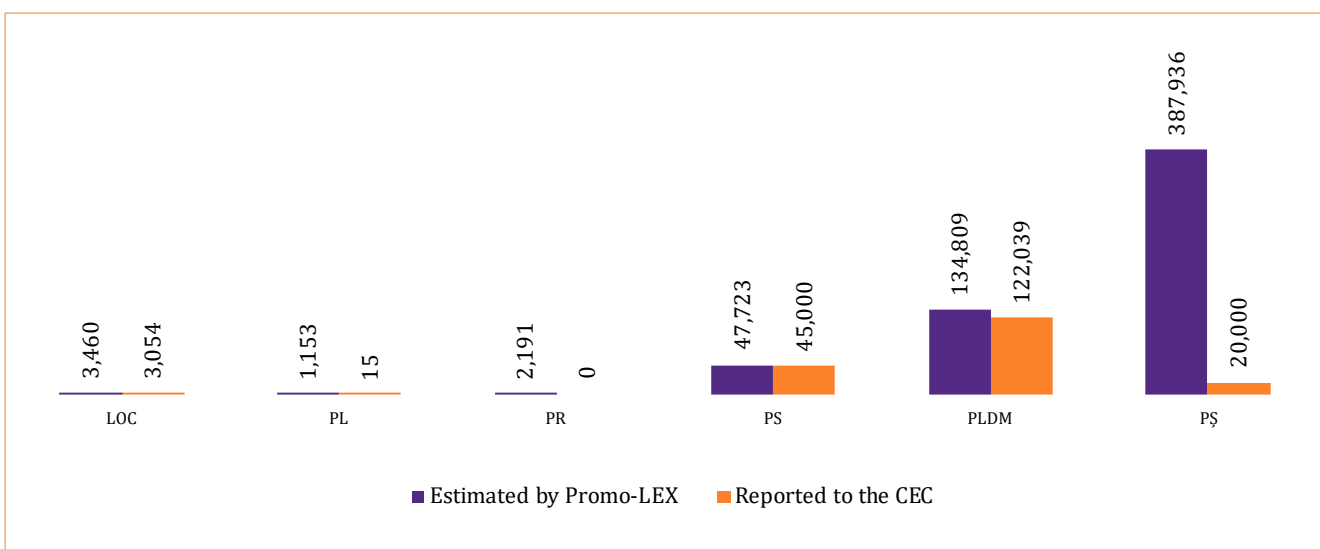
The most unreported expenditure for internet advertising was estimated for PSDE (28,072 lei), PȘ (17,901 lei) and MAN (11,060 lei).

9.5.7. Estimated Expenses for Advertising on Internet

Sponsored advertising on internet was widely used during the local general elections. Drawing from publicly accessible reports on Meta, unreported expenditures by 6 electoral competitors were estimated to be at least 387,165 lei (see Chart No. 37).

Chart No. 37

Estimated Expenses for Social Media Advertising



The highest unreported expenses for social media advertising were estimated for the PȘ (367,936 lei), the PLDM (12,770 lei), and the PS (2,723 lei).

In the context of social media spending, at least 28 instances were identified where, without disclosing the actual provider of paid advertising, Ilan Shor and his team, the SP, and IC Arina Corșicova¹⁸³ were promoted, with spending for this purpose estimated at at least 808,243 lei. Of this, 383,117 lei were specifically allocated to the PȘ, in support of its candidates during the general local elections.

In four other cases,¹⁸⁴ without publishing information about the actual provider of the paid advertising, it was observed that electoral advertising was distributed to denigrate the candidate nominated by MAN for the position of mayor of the municipality Chisinau, Ion Ceban, and IC Vitalie Vrabie. The expenses incurred for this purpose amounted to at least 47,059 lei.

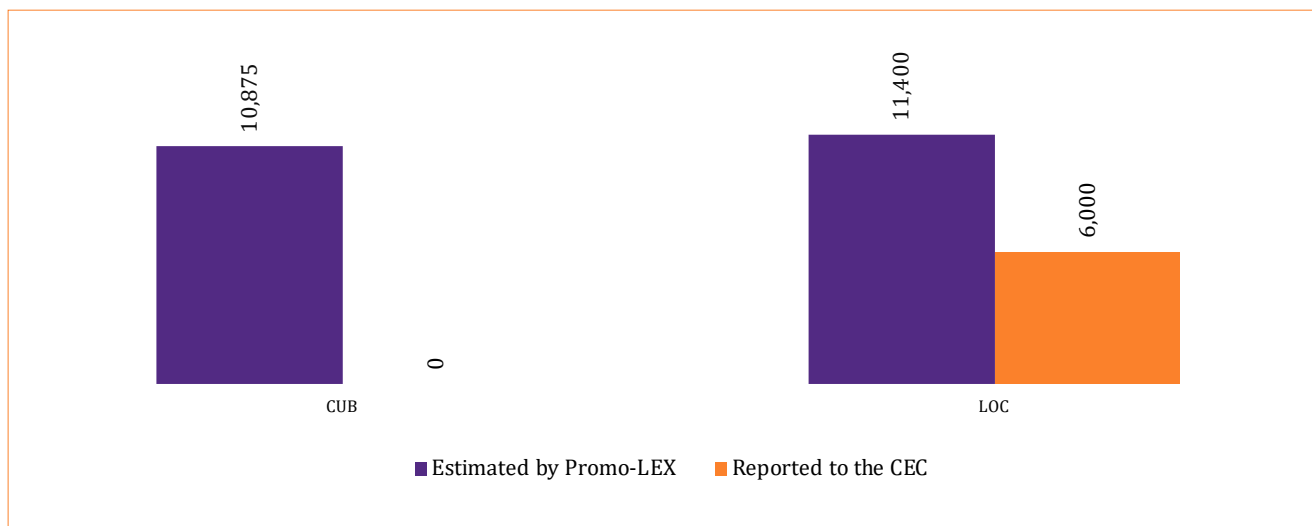
In this context, we reiterate that Promo-LEX has previously drafted and publicly presented a policy paper on political and electoral financing by “third parties”, in which it argued the need to regulate political and electoral financing by third parties.¹⁸⁵

9.5.8. Estimated Expenses for Print Media Advertising

During the observation period, Promo-LEX monitors documented the promotion of electoral contenders through articles in the local and regional periodical press. Drawing on their reports, unreported expenditures for two electoral competitors were estimated to total at least 16,275 lei (refer to Chart No. 38).

Chart No. 38

Estimated Expenses for Print Media Advertising



The most unreported expenditure for print advertising was estimated for CUB (10,875 lei) and LOC (5,400 lei).

183 Moldova Full of Surprises, MoldResurs, Moldova Balanced, Moldova Resources, Moldovan Traditions and Customs, Friendly Moldova, Moldova on the Move, Moldova for All, Moldova 24/7, Moldova’s Possibilities, Moldova With Hope, Moldova Inspired, Moldova in Media, A New Moldova, Press Moldova, I Love Moldova, Moldova News Center, Passion for Moldova, Progressive Moldova, Inspiration from Moldova, Soul of Moldova, Educational Moldova, Home is Moldova, Working Moldova, Moldovan Dream, Moldova’s Vision, Moldova in Harmony, Travelling through Moldova.

184 I Love Chisinau, Stop Thievery and War, Ivan Trotuar and SOS Chisinau.

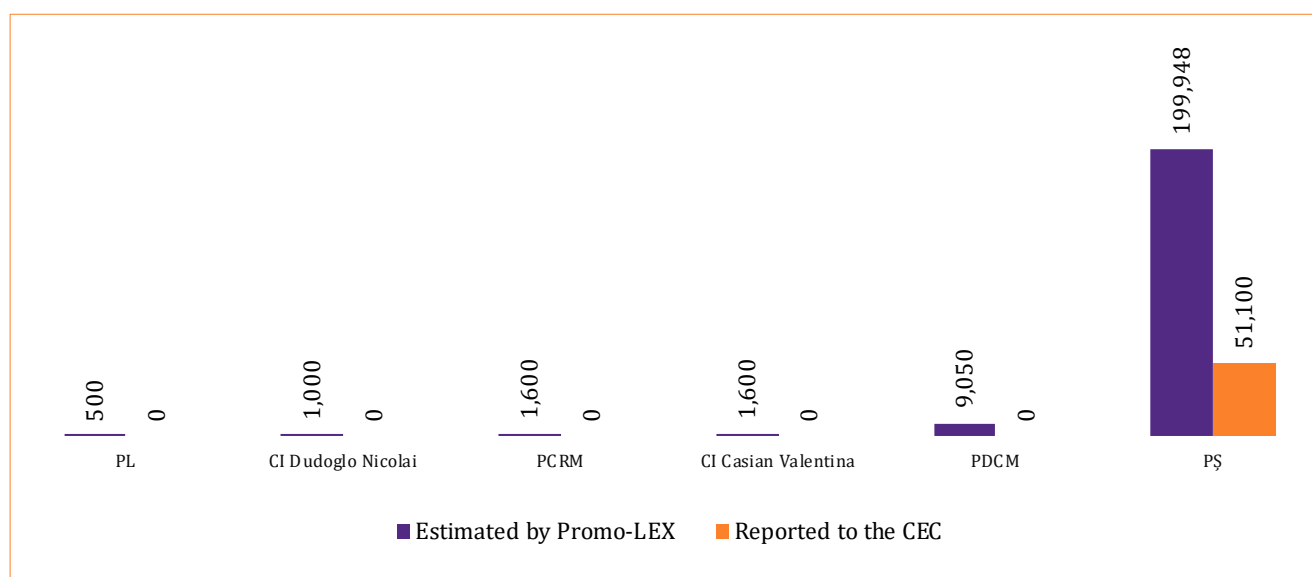
185 Policy Paper: Political and Electoral Financing by “Third Parties”.

9.5.9. Estimated Expenses for Organizing Political and Electoral Events

During the election campaign, Promo-LEX observers reported on the organization of election meetings, campaign launch events, distribution of election materials, etc. Based on the information submitted, it was estimated that 6 electoral competitors incurred unreported expenses of at least 162,598 lei (see Chart No. 39).

Chart No. 39

Estimated Expenses for Organizing Electoral Events

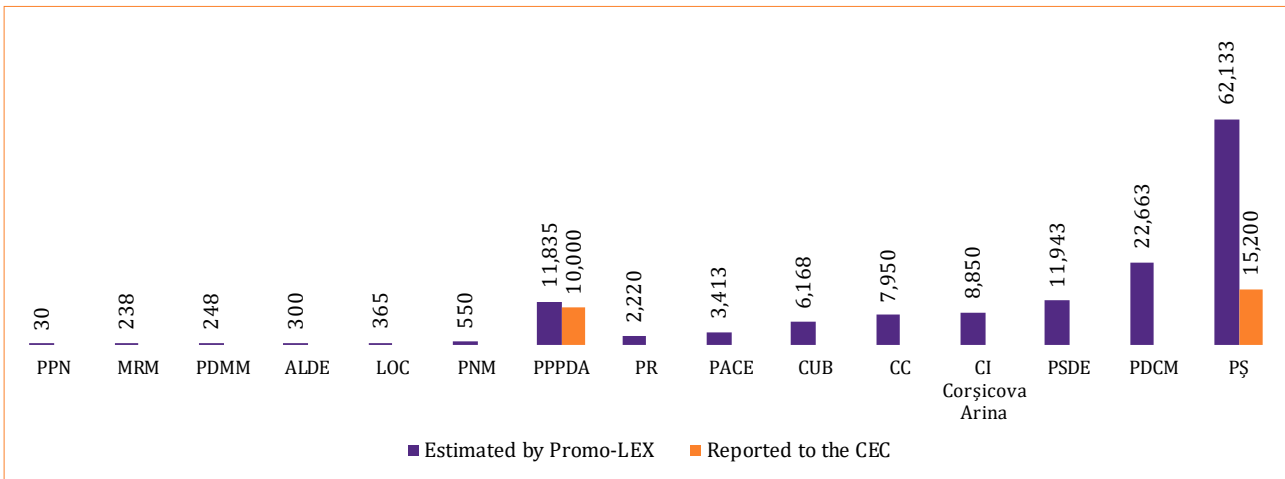


The most unreported expenses for organizing electoral events were estimated for PŞ (148,848 lei), PDCM (9,050 lei) and PCRM (1,600 lei).

9.5.10. Estimated Expenses for Fuel, Transportation, and Logistics

During the observation period, Promo-LEX monitors reported on campaign activities that involved the travel of electoral competitors or their representatives to various settlements across the Republic of Moldova, leading to transportation costs. On the basis of this information, it was estimated that 15 electoral competitors incurred unreported expenses amounting to at least 113,703 lei (see Chart No. 40).

Estimated Expenses for Fuel, Transportation, and Logistics

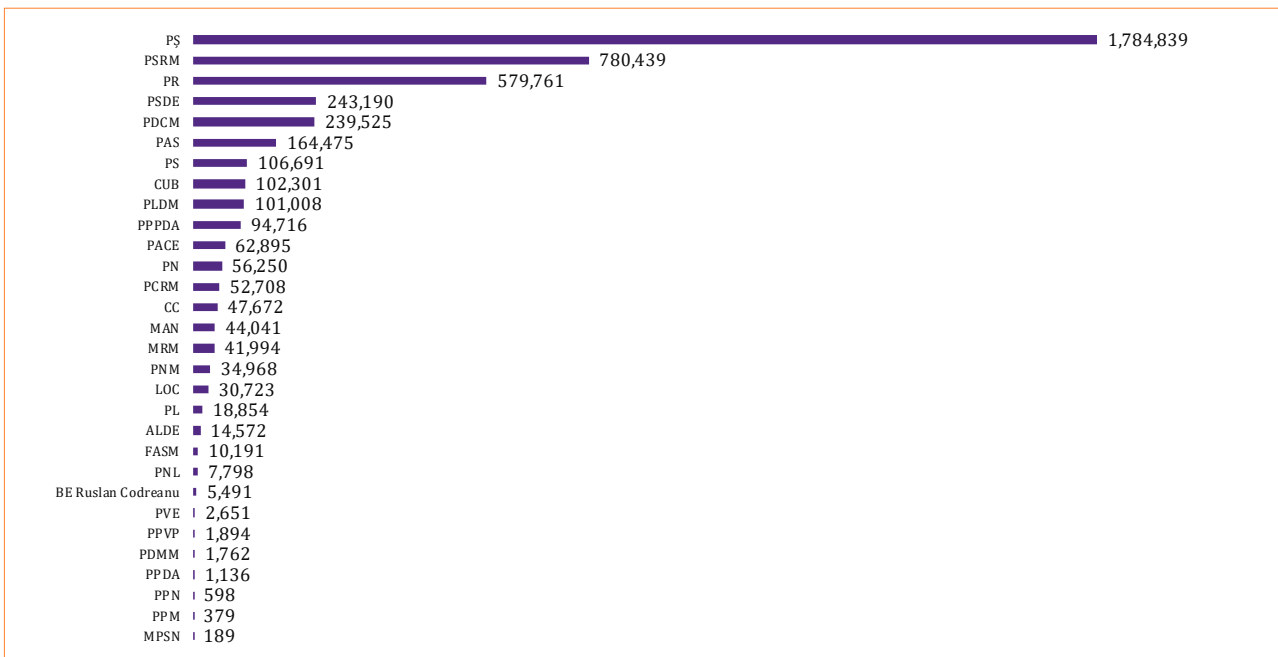


The most unreported expenditures for petrol/fuel and transportation were estimated for PŞ (46,933 lei), PDCM (22,663 lei) and PSDE (11,943 lei).

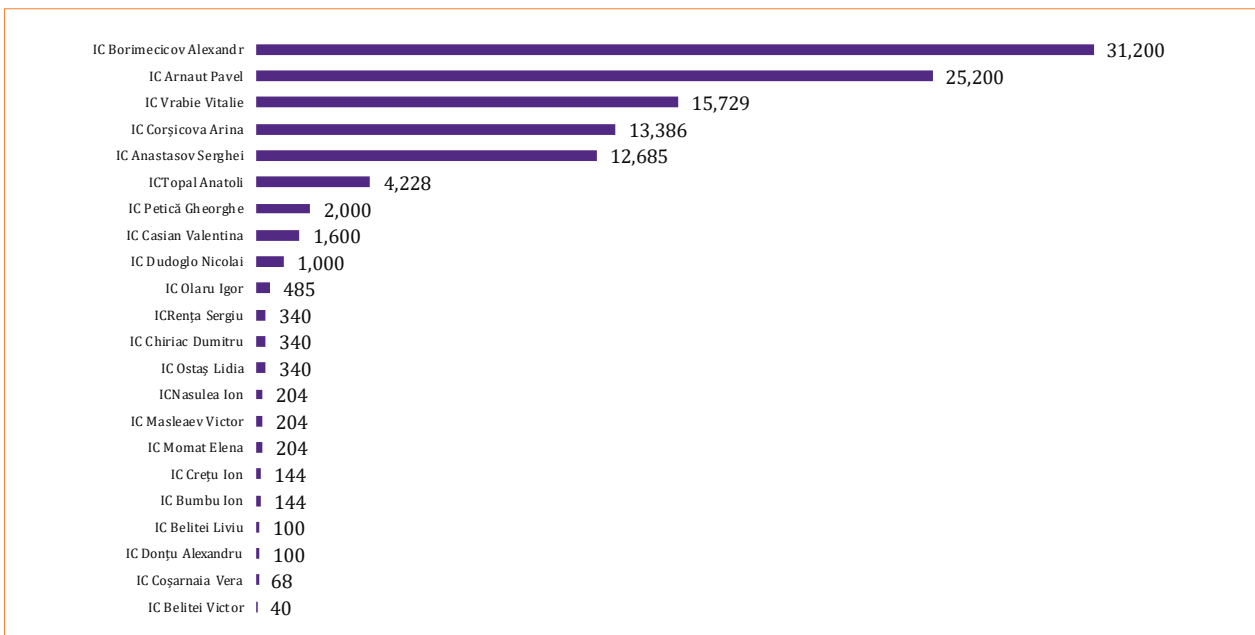
9.5.11. Conclusions on Civic Monitoring of Campaign Financing

In this context, for the campaign activities conducted by 30 political parties and 22 ICs, the Promo-LEX EOM estimated that there were at least 4,743,455 lei in unreported expenses, with 98% (4,633,713 lei) attributed to the 30 political parties and 2% (109,742 lei) to the 22 ICs. Among the political parties, the highest amount of unreported expenditure was estimated for PŞ at 38%, followed by PSRM at 16%, and PR at 12%.

Total Estimated Unreported Expenditure for Political Parties

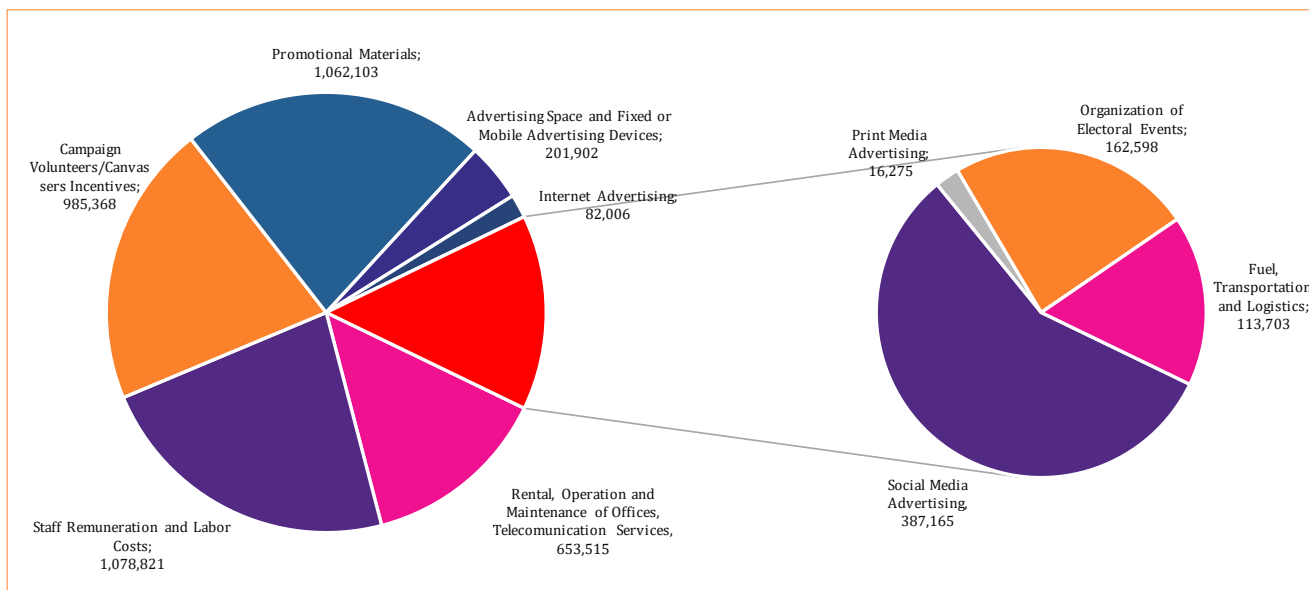


Total Estimated Unreported Expenditure for IC



Based on the categorization of the estimated unreported expenses, the largest portion was allocated for labor compensation at 23%, followed closely by promotional materials at 22%, rewards for campaign volunteers/canvassers at 21%, and the rental, maintenance, and operational costs of offices, including telecommunication services, at 14% (see Chart No. 43).

Purposes of Unreported Expenses Estimated by Promo-LEX

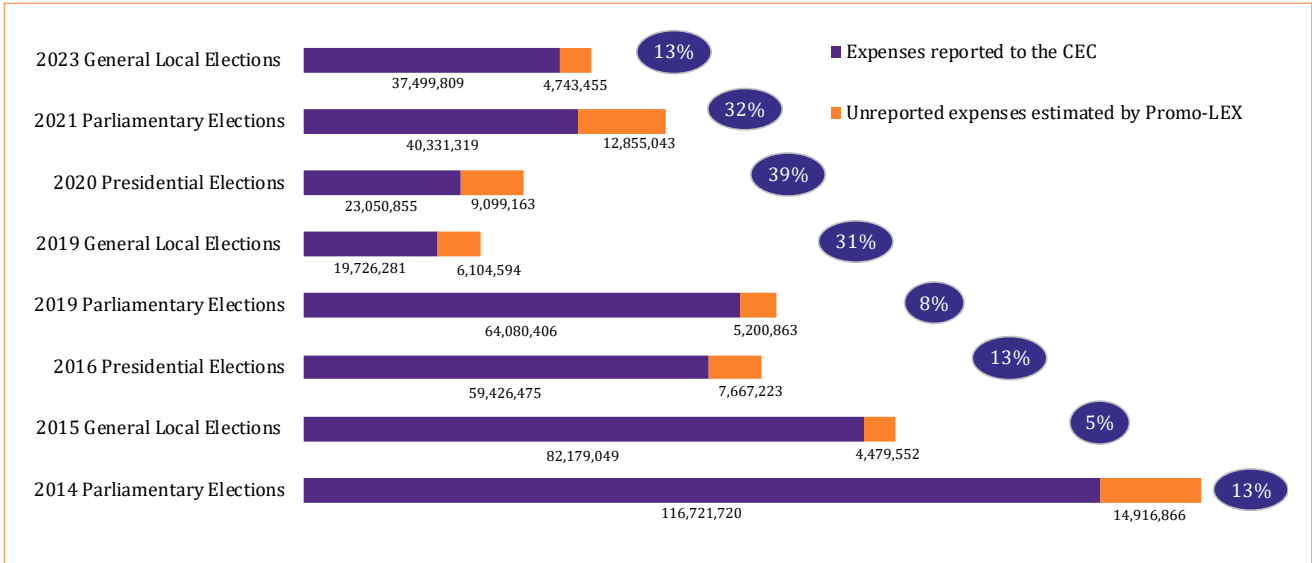


In the context of the 2023 general local elections, while campaign finance transparency seems to have improved compared to the last three national elections, it still remains insufficient and demands further improvement.

For instance, during the 2019 general local elections, Promo-LEX estimated unreported expenditures at about 31% of the total expenditures reported to the CEC. This figure rose to 39% in the electoral campaign for the 2020 presidential elections and was at 32% in the electoral campaign for the 2021 presidential elections and was at 32% in the context of the 2021 early parliamentary elections. However, in the 2023 general local elections, the unreported expenditures were reduced to 13% of the total reported expenditures.

Chart No. 44

Evolution of Expenditure Reporting Transparency During Electoral Campaigns (2014 - 2023)



CHAPTER X

HATE SPEECH AND INCITEMENT TO DISCRIMINATION

10.1. The dynamics of hate speech

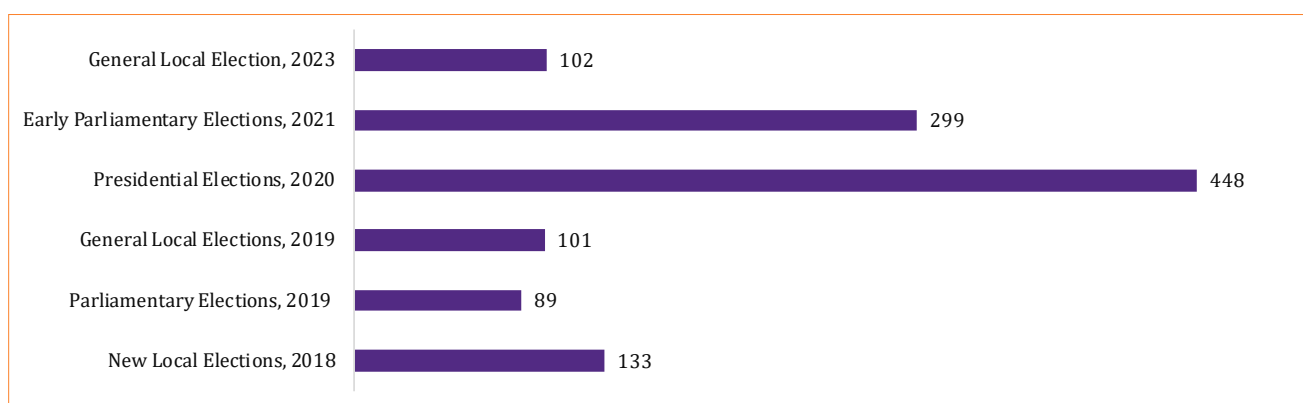
The monitoring conducted by the Promo-LEX Association from 2018 to 2021 reveals a consistent presence of hate speech during electoral periods. During the most recent elections—the presidential elections of November 1, 2020, and the early parliamentary elections of July 11, 2021—there were, on average, 4.9 and respectively 3.2 new cases of hate speech recorded daily. From 2018 to 2021, the most frequent authors of hate speech were men (88.37%) within the 35-50 age group (60%), while individuals under 35 used this type of speech the least (10.6%).

The criteria that were the basis of hate speech during this period were ‘political affiliation’, ‘sex/gender’, and ‘sexual orientation’. The 1 950 cases identified predominantly targeted election competitors and politicians, women, and members of the lesbian, gay, bisexual, transgender, queer, and intersex (LGBTQI) community. These cases of hate speech were shared 800 000 times and viewed over 40 million times.

In the context of the general local elections on November 5 (19), 2023, 102 cases of hate speech were identified, averaging 1.1 new cases per day.

Chart No. 45.

Dynamics of hate speech during election campaigns

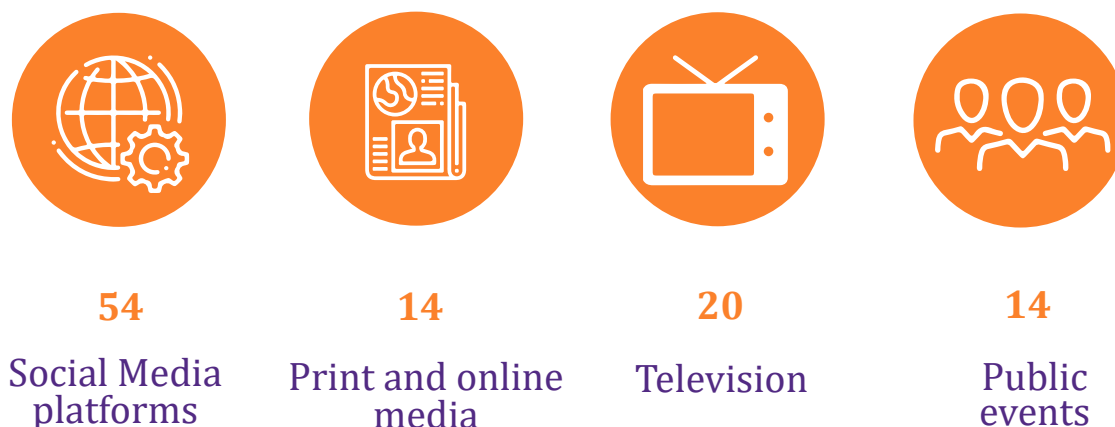


10.2. The extent and impact of hate speech

The 102 cases of hate speech were predominantly found on social media platforms and mobile applications (such as Facebook, YouTube, and Telegram). Television, print, and online media continue to be the primary sources for disseminating hate messages or fostering stereotypes and prejudices. Public events, including press conferences, protests, and election rallies, also served as venues for these expressions.

Table No. 8.

General categories of sources



Cases of hate speech were viewed over 2 million times, averaging 31 000 views daily. This data was gathered from web pages, social media, and online platforms. The identified instances were shared by at least 20 online media outlets through their websites or social media accounts, particularly Facebook.

Table No. 9.

Public resonance

2 859 975	15 914
views	shares

10.3. Distribution of hate speech by authors and affected groups

During the election period for the general local elections on 5 (19) November 2023, the authors of hate speech cases were primarily male, accounting for 89 incidents (approximately 93%). This finding was based on analyses where gender information was identifiable in 96 instances. These data align with trends observed from 2019 to 2021, where the average proportions of hate speech authors were 91% for men and 8.38% for women.

Table No. 10.

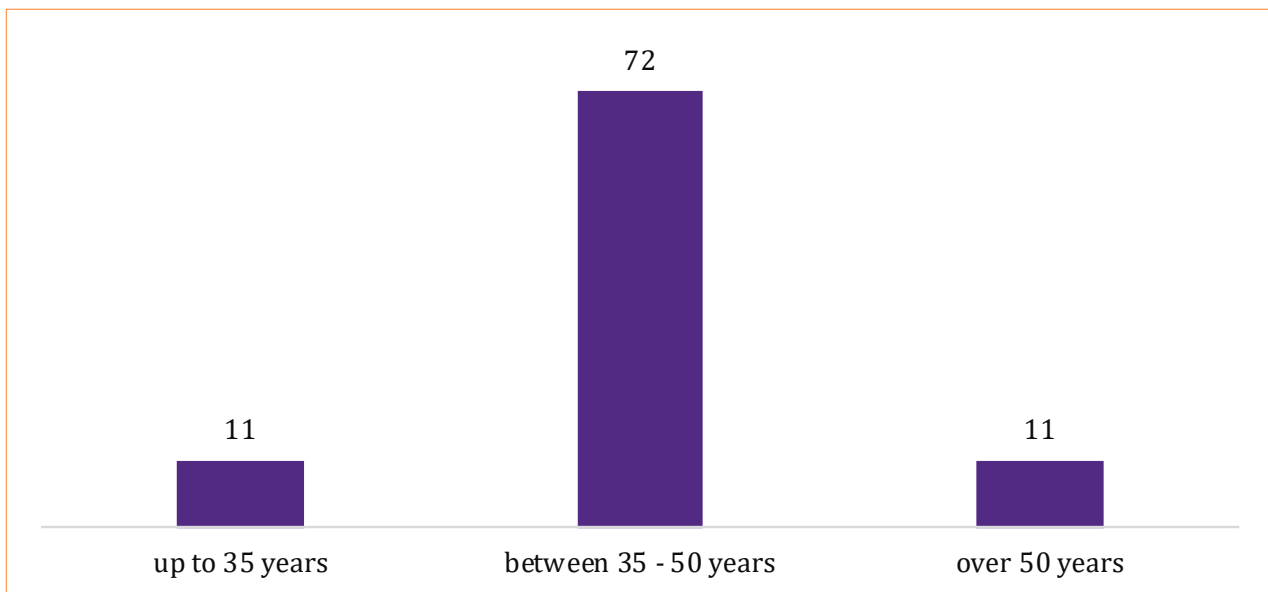
Distribution of hate speech by gender of authors



The analysis further highlights that people aged 35 to 50 are the most frequent users of hate speech, with 72 people in this age group responsible for approximately 76% of incidents. This marks an increase from 52% in 2019, observed during and around that year's general local elections, and from the last elections in 2021, where it stood at 63.69%. Conversely, hate speech usage among younger people (under 35) remains low, involving 11 people, or approximately 12% of cases, a trend that has persisted since 2018. There's also a notable decline in hate speech usage among individuals over 50, down to approximately 12% from 38% in 2019.

Chart No. 46.

Distribution of hate speech in terms of the author's age



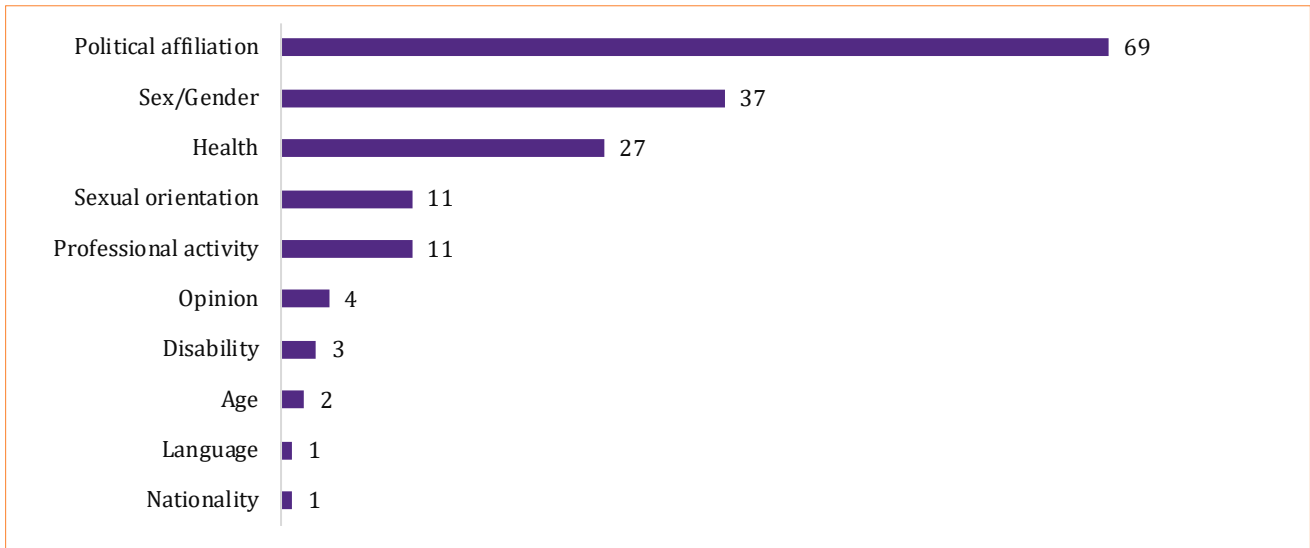
Note: The information concerning the age of those who generated hate speech was derived from instances where this data was identifiable, totaling 94 cases.

The criteria that were the basis of the hate speech primarily included “political affiliation”, “sex/gender”, “health”, “sexual orientation”, and “professional activity”. With regard to “political affiliation” and “gender”/“sex” criteria their presence confirms the longstanding trends recorded in recent years. There were the first two criteria that were the basis of hate speech in 2019, including those in the campaign for the general local elections of that year. For the first time, the “health” criterion is among the criteria that most often were the

basis of hate speech. Previously, only in 2020 presidential election campaign, “professional activity” was among the top four criteria that were the basis of hate speech. The rise of the criteria of “health” and “professional activity” shows the way in which the context is exploited to create new themes that generate stigmatization and marginalization.

Chart No. 47.

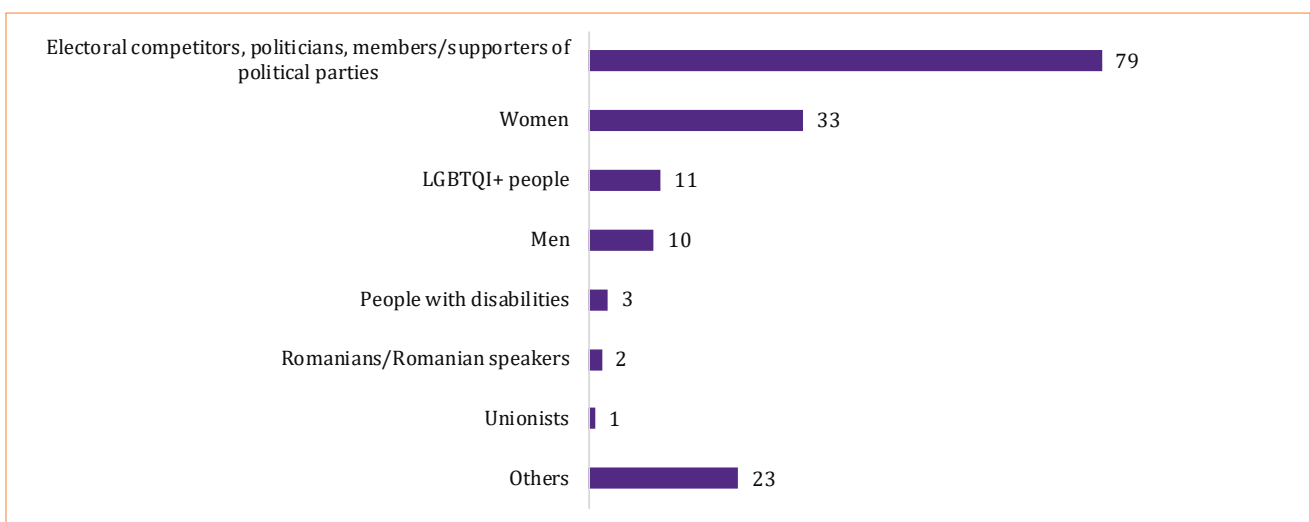
Criteria underlying hate speech



In the 2023 general local elections held on 5 (19) November, the groups most affected by hate speech were electoral competitors, politicians, political party members/supporters, women, LGBTQI people, men, and people with disabilities, etc. Data from previous monitoring processes confirm the maintenance of the trend regarding the main groups affected by hate speech during the election period. In 2019 also, electoral competitors, politicians, women, and LGBTQI people consistently were among the groups most frequently targeted by hate speech. The “others” category encompasses public officials and people with specific psychological/mental or autism spectrum conditions, etc.

Chart No. 48.

Groups affected by hate speech

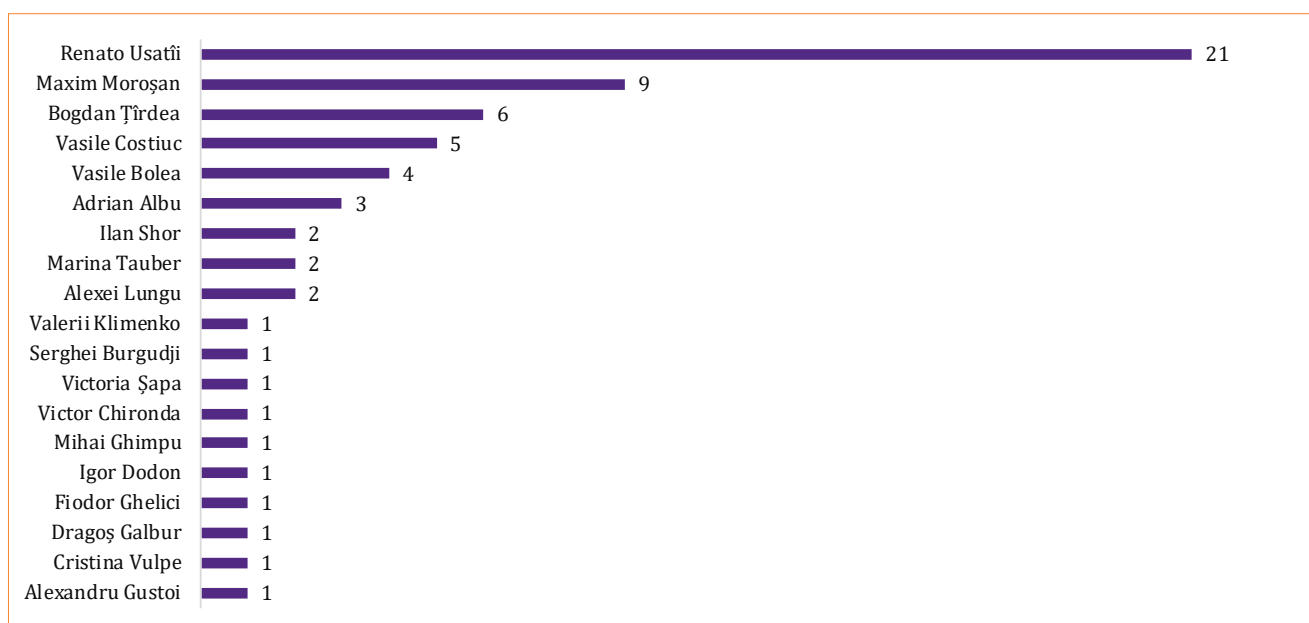


10.4. Hate speech and intolerance generate by and against electoral competitors and politicians

The monitoring data indicates that of the total number of authors of hate speech, 53% were electoral competitors or politicians. Renato Usatîi, candidate for the position of councilor in Balti Municipal Council, the president of Our Party and the former mayor of Balti City (2015–2018), Maxim Moroşan, the PSRM’s candidate for the position of mayor of Balti, and Bogdan Țîrdea, the deputy of the parliamentary faction “The Bloc of Communists and Socialists” in the Parliament of the Republic of Moldova, used this type of speech more often compared other electoral competitors and/or politicians.

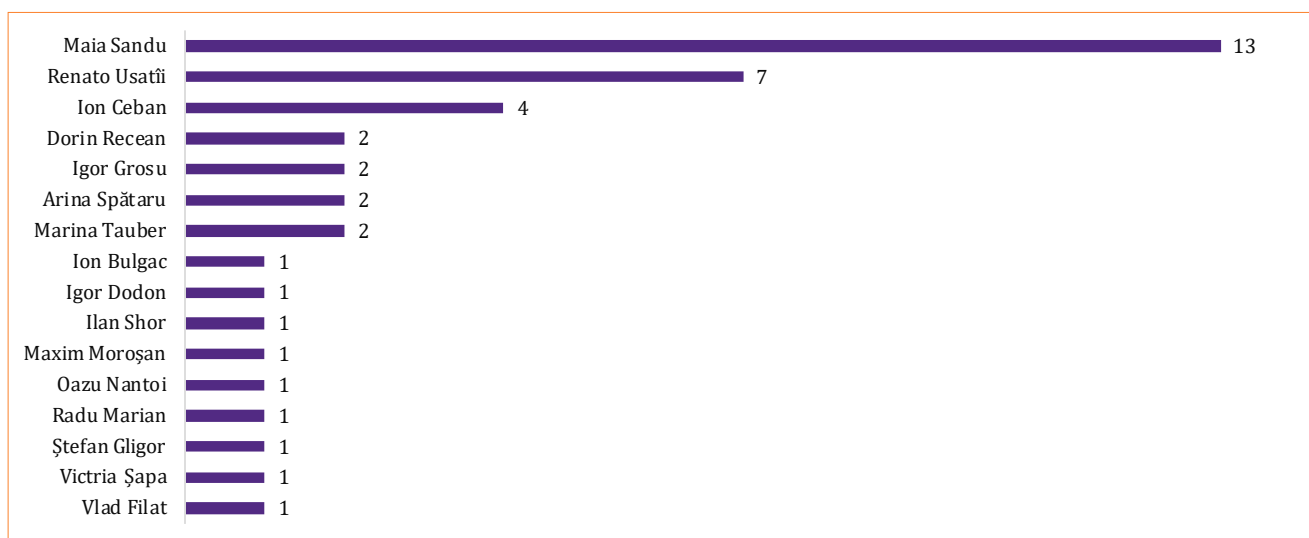
Chart No. 49.

Electoral competitors and politicians who used hate speech



The same data indicate that during the campaign for the general local elections on November 5 (19), 2023, hate speech predominantly affected groups of people rather than specific individuals. The electoral competitors and politicians most frequently targeted by hate speech and intolerant messages were: Maia Sandu, the President of the Republic of Moldova; Renato Usatîi, the candidate for the position of councilor in Balti Municipal Council from the PN party; and Ion Ceban, the candidate from the MAN party for the position of mayor of Chisinau.

Electoral competitors and politicians affected by hate speech



Hate speech targeting LGBTQI people has been among the most aggressive, that confirms the general trend observed from 2018 to 2021. During the election campaign for the general local elections on November 5 (19), 2023, hatred messages and incitement to discrimination based on “sexual orientation” and “gender identity” were notably propagated by members of the PSRM and Renato Usatîi, the candidate for the position of councilor in Balti Municipal Council and the president of the PN party. These were a continuation of the messages constantly promoted in the public space and online that create a hostile environment towards this group, but also lead to an increase in the number of cases of the prejudice-motivated crimes based on “sexual orientation”/”gender identity”.¹⁸⁶

Despite the fact that the proportion of female candidates for municipal councilor was 45.3% and for local councilor 47.2%, representing a 2% increase from 2019,¹⁸⁷ sexist discourse has persisted in electoral rhetoric. This trend corroborates the findings from monitoring data between 2018 and 2021, indicating that sexist discourse is not only prevalent during election periods but also beyond. Typically rooted in sexist attitudes, this discourse often leverages gender stereotypes and prejudices. It is commonly aimed at electoral competitors and/or politicians, with the intent to denigrate or ridicule them. Nevertheless, sexist discourse indirectly impacts groups represented by women or men in general.

10.5. The public authorities' reaction to hate speech cases

Monitoring data indicates a positive dynamic regarding the reaction of public authorities to hate speech during the general local elections on November 5 (19), 2023. The number of registered complaints and documentation of potential hate speech cases is increasing compared to the last four years. The General Inspectorate of Police initiated six contravention lawsuits under Article 52, paragraph (3) of the Contravention Code. Out of these, contravention reports have been drafted in four cases, with two still under review¹⁸⁸. The Audiovisual Council initiated controls in the case of 25 providers of audiovisual media

186 Between July 3, 2022, and July 3, 2023, the Information Centre “GENDERDOC-M” documented 15 instances of prejudice-motivated crimes targeting LGBTQI people, Association Promo-LEX [Analytical Study](#) with regard to the procedure of investigation and bringing to contravention and criminal liability provided by the new provisions on hate speech, 2023, page 13. This data was last accessed on January 25, 2024.

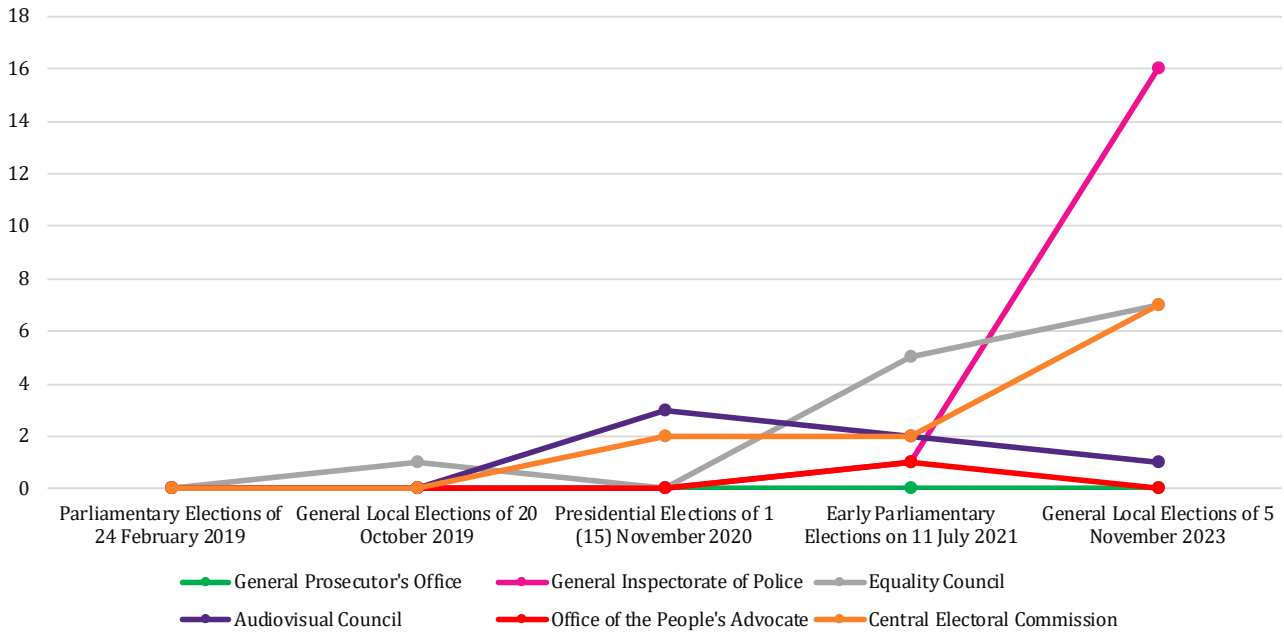
187 Partnership for Development Centre, Civic Coalition for Free and Fair Elections, [Study](#) on the representation of women and men in the office of councilor. The triumph of the double quota system or how we have achieved fair representation, 2023, page 5, last accessed on January 28 2024.

188 General Inspectorate of Police, Letter No. 34/17-8250 of 20 December 2023.

services regarding compliance with the provisions of the Electoral Code and the Audiovisual Media Services Code (inclusive avoiding any form of discrimination and hate speech). Since 2022, the existence of a non-institutionalized practice of requesting advisory opinions from the Equality Council by fact-finding agents has been observed.

Chart No. 51.

Dynamic of complaints registration regarding hate speech cases



CHAPTER XI

VOTER EDUCATION AND INFORMATION

11.1. Promo-LEX Campaign for Information, Electoral Education and Apolitical Mobilization of Moldovan Citizens with the Right to Vote

In the run-up to the general local elections on 5 (19) November 2023, the Promo-LEX Association, alongside three partner organizations that received sub-grants from the association, conducted over 209 initiatives aimed at informing, educating electorally, and apolitically mobilizing citizens eligible to vote, with a particular focus on engaging young voters.

To create a platform for dialogue between candidates vying for the position of General Mayor of Chisinau and the electorate, and to encourage voting that is both informed and deliberate, eight electoral debates were organized. These debates were a collaborative effort with the ProTV Chisinau TV station, the independent online outlet “NewsMaker,” the Public Association “Center for Journalistic Investigations” (Anticorupție.md portal), the Public Association “Primăria Mea”, the IPN Press Agency, and the Privesc.eu portal. Hosted by ProTV Chisinau, the debates were extensively promoted by Promo-LEX Association and its partners through social media, generating at least 88 posts and news pieces.

Promo-LEX also organized four public electoral debates with candidates for mayor in four localities: the village of Mereni (Anenii Noi district), the village of Slobozia Mare (Cahul district), the village of Sărata Galbenă (Hincesti district), and the village of Sociteni (Ialoveni district). Of the 18 candidates registered for the electoral race in these constituencies, 13 participated in the debates, with 10 being nominated by political parties and three being independent candidates. Approximately 330 voters participated in the debates.

The organizations that received sub-grants from Promo-LEX—Public Association “Association for Participatory Democracy” (ADEPT), “Interact Media” SRL (AGORA), and Public Association “Sud-Est MEDIA” (Moldova.org)—executed 119 activities aimed at enhancing voter information, electoral education, and apolitical mobilization, with a particular focus on engaging young voters. These activities employed the most contemporary means of communication for disseminating electoral messages, including news articles, video reports, explanatory and informative videos, studio interviews, analytical notes, press conferences, talk shows, newspaper articles, and posts on social media platforms.

Promo-LEX also created two motivational videos to inspire voter participation, which were disseminated across various social media platforms, amassing a total of four million views. Furthermore, these public service announcements were broadcast on 12 national and regional television channels.

Moreover, beginning with the initiation of the General Local Election Observation Mission on 5 September 2023, Promo-LEX has conducted 11 press conferences to discuss the organization and oversight of the electoral process. To guarantee that individuals with hearing impairments have access to publicly significant information, all press briefings held by the observation mission included sign language interpretation.

11.2. Training and Information Activities Organized by the CEC and CICDE

Training Activities: The Center for Continuous Electoral Training (CICDE) conducted a comprehensive suite of 311 training sessions—including seminars, webinars, videoconferences, and live conferences—to educate a wide range of participants involved in the electoral process. These participants included electoral officials, State Registry of Voters (SRV) registrars, operators of the State Automated Information System “Elections” (SAISE), DEC II operators, judges, and officials from the Ministry of Internal Affairs (MIA). A notable total of 34,888 individuals engaged in these CICDE-organized activities. Additionally, the CICDE took the initiative to develop or update educational materials tailored for DEC members, Polling Election Bureau (PEB) staff, operators, and MIA officials, and produced three instructional videos to further support the training process.

Outreach Activities: The Promo-LEX Election Observation Mission (EOM) observed that throughout the monitoring period, the CEC consistently kept the public informed about updates to the Electoral Code and its own operational activities. This effort to ensure transparency and promote electoral education was accomplished through various channels, including the CEC’s official website and collaborative initiatives with other public institutions. Moreover, the CEC engaged in direct outreach by participating in television and radio programs and organizing public events featuring representatives from political parties.¹⁸⁹

The CEC undertook two significant information campaigns to enhance electoral awareness among various stakeholders. The inaugural campaign, titled “Know Your Electoral Right,” was implemented across different regions. This initiative successfully educated over 1,500 local public administration representatives on the latest updates to the Electoral Code, aiming to improve the administration of electoral processes. The second campaign specifically targeted the electorate, focusing on increasing voter awareness and understanding. To achieve this, the CEC produced and distributed a variety of informational materials tailored for speakers of five ethnic minority languages: Russian, Ukrainian, Gagauz, Bulgarian, and Romani.

Further enhancing accessibility, the CEC collaborated with the “INFONET” Alliance to create both audio and mime-gesture language versions of the “Voter’s Guide to the General Local Elections on 5 November 2023”. This effort underscored the commitment to ensuring all voters, including those with hearing impairments, had the necessary resources to participate fully in the electoral process. In addition to these campaigns, the Promo-LEX EOM highlighted an important information drive conducted by the General Inspectorate of Police. This campaign focused on raising public awareness about electoral corruption and the measures in place to address and penalize such misconduct.¹⁹⁰

189 [Report No. 1](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 19.

190 [Report No. 3](#). Promo-LEX Observation Mission to the General Local Elections of 5 November 2023, p. 8.

CHAPTER XII

ELECTION DAY

12.1. Opening and Closing of Polling Stations

On 5 November 2023, Promo-LEX's observation efforts during the local general elections spanned across 602 Polling Stations (PSs) through static observers. The monitoring extended into the second round of voting and any instances of repeat voting, covering 175 PSs with the same diligent observation. Additionally, the election process was scrutinized by 70 mobile observer teams in the first round and by 50 teams in the subsequent round.

The observation reports indicate that a majority of the polling stations were promptly declared open and closed within the scheduled times. Specifically, about 90% (606) of the observed stations opened within the 10-minute window from 6:50 AM to 7:00 AM, while the remaining 66 stations (10%) opened slightly later, between 7:01 AM and 7:15 AM.

In alignment with the new Electoral Code, particularly Article 77 (1), the arrangement of polling station premises is mandated to fulfill the criteria of accessibility, legality, transparency, efficiency, and, notably, the solemnity of the voting process. The emphasis on solemnity is a novel requirement, introduced for the first time in this election cycle. Observer data analysis reveals that approximately 27% of PSs in the first round and 29% in the second round fell short of meeting the solemnity criterion, highlighting an area for potential improvement in future elections.

Table No. 11.

Opening of Polling Stations

Subject	YES		NO		Total PSs	
	Round I	Round II	Round I	Round II	Round I	Round II
Was the solemnity of the voting process upheld through the playing of the national anthem at the opening of polling stations and the display of the national flag within the premises?	490 (73%)	160 (71%)	182 (27%)	65 (29%)	672	225

Accessibility for voters with mobility impairments at polling stations continues to be problematic, and the provision of heating at polling stations was insufficient.

Table No. 12.

Polling Station Accessibility

Subject	YES		NO		Total PSs	
	Round I	Round II	Round I	Round II	Round I	Round II
Is the polling station equipped with facilities to accommodate voters with mobility difficulties?	713 (52%)	239 (42%)	652 (48%)	336 (58%)	1365	575
Is adequate heating provided at the polling station?	175 (26%)	175 (77%)	497 (74%)	50 (23%)	672	225

Regarding the closing procedures, it's important to emphasize once again that not all Precinct Electoral Bureaus (PEBs) adhere to the regulatory requirement that mandates only one member of the PEB should present the ballot papers to all participants during the counting process.

Table No. 13.

PSs Closing Procedures and Counting Ballots

Subject	YES		NO		Total PSs	
	Round I	Round II	Round I	Round II	Round I	Round II
Did the polling station close at 9:00 p.m.?	667 (99%)	224 (99%)	6 (1%)	1 (1%)	673	225
Was the ballot presentation to all counting process participants conducted by a single member of the PEB?	409 (61%)	166 (74%)	264 (39%)	59 (26%)	673	225
Was the entire process of unsealing the ballot boxes and counting the ballots continuously recorded by the video camera without interruption?	646 (96%)	224 (99%)	27 (4%)	1 (1%)	673	225

12.2. Incidents Observed on Election Day

After the complete analysis of data reported by Promo-LEX observers, a total of 854 incidents were identified and examined over the two rounds of the elections: 726 incidents in the first round and 128 in the second round.

For context, during the early parliamentary elections on 11 July 2021, the number of reported incidents on election day (single round) amounted to 480, marking a significant rise in the number of incidents.

Table No. 14.

Incidents reported by Promo-LEX observers on Election Day (rounds I and II)

No.	Incident Category	Round I	Round II	Total
1	Presence of advertising materials, posters, billboards within the radius of the polling station (100 meters from the polling station premises)?	13	4	17
2	Restricting observer access or obstructing free observation in polling stations.	10	3	13
3	Issues with ballot box sealing: non-compliance, damage, or missing seals.	16	9	25
4	Unjustified presence of unauthorized individuals in or around polling station premises (within 100m radius).	58	28	86
5	Violations of Ballot Secrecy (photographing of ballot papers, displaying the ballot paper with the vote cast, improper placement of polling booths allowing visibility of voter's choice, third parties marking the names/surnames of voters who voted, etc.)	128	22	150
6	Ballots not distributed to PEB members are not stored securely in a safe/drawer within the polling station.	5	1	6
7	Rumors, attempts, or instances of offering material or monetary incentives to voters within 100 meters of the polling station to influence voting.	7	0	7
8	Electioneering or negative PR actions within 100m perimeter and/or polling station precinct to influence voter choice.	22	1	23
9	Organized transportation of voters (coaches, minibuses, or other vehicles not commonly found near polling stations).	7	9	16
10	Interruption of the filming process during Election Day.	71	12	83
11	Acts of violence or intimidation towards voters or others	13	2	15
12	Deficiencies in the functioning of the State Automated Information System "Elections" (SAISE) (disruptions; instances where SAISE indicates a voter has voted when they claim not to have).	55	3	58
13	Inaccuracies in the electoral lists (address discrepancies; deceased voters; signatures on behalf of others).	88	5	93
14	Unjustified group voting (2 or more people in voting booths) or repeated assistance by the same individual to voters unable to complete ballots on their own.	128	5	133
15	Unjustified interruption/suspension of voting at the polling station.	3	0	3
16	Refusal to release copies of all requested vote-counting protocols (records, minutes).	6	2	8
17	Others	96	22	118
TOTAL		726	128	854

Promo-LEX Observation Mission has highlighted instances where, in at least 13 cases, its observers faced restrictions in freely observing the electoral processes, including difficulties in obtaining the minutes of vote counting and tabulation.

The most commonly reported incidents included breaches of vote secrecy (150 instances), unjustified group voting (133), deficiencies in the voter lists (93), the unjustified presence of unauthorized persons within the 100-meter perimeter or inside the polling station premises (86), and interruptions in the filming process throughout the day (83).

12.3. Final Results of Vote Counting

The parallel vote tabulation carried out by Promo-LEX Election EOM for the mayoral races in Chisinau and Balti revealed minor discrepancies when compared to the official results from the CEC. These differences were not significant enough to affect the overall standings of the electoral contestants.

Additionally, Promo-LEX EOM scrutinized the accuracy of 365 vote counting protocols from the first round of elections and 60 from the second round. The discovery of 18 protocols containing errors represents a decrease in such inaccuracies relative to previous elections.

Table No. 15.

Dynamics of Erroneous Completion of Protocols

	2019 General Local Elections (2 rounds)	2020 Presidential Elections (2 rounds)	2021 Early Parliamentary Elections	2023 General Local Elections (2 rounds)
Number of protocols containing errors	30	43	24	18

In the context of the first and second rounds, 18 protocols containing 31 errors were identified on the basis of the verification forms.

Table No. 16.

Type and Number of Errors Found

Error Type	Errors Found (rounds I and II)
$D = F+H$	4
$E = C-D$	3
$I = C+J$	2
$H = G1+G2+G3+G4+Gn$	10
$F = D-H$	4
$J = I-C$	7
$C \geq D$	1

12.4. Registering Voters to Supplementary Lists and Voting Using Electoral Lists at Their Current Place of Stay

Based on the reports from observers, on Election Day, 5 November 2023, across the 673 polling stations (PSS) monitored, 9,884 voters were registered on the supplementary lists, amounting to approximately 2% of the total voter turnout. On 19 November 2023, about 2.5% of voters utilized the supplementary lists in the 220 PSS observed, totaling 3,180 voters.

Notably, the highest counts of voters using supplementary lists were observed in the polling station 15/3 of Dubăsari, Corjova (991 voters), polling station 1/253 of Chisinau, Cricova (249 voters), polling station 1/251 of Chisinau, Cricova (167 voters), polling station 22/4 of Leova, Leova (152 voters), and polling station 1/212 of Chisinau, Rascani.

Promo-LEX EOM also highlights a significant number of requests for voting at the place of stay. According to the information provided by observers, in the first round of voting, at the opening of polling stations (672) there were about 27,949 requests for voting at the place of stay, and for the second round of voting - 9,577 in 225 polling stations

This trend warrants close monitoring by the CEC to prevent potential abuses that could impact the election results. According to paragraph 40 of the Code of Good Practice in Electoral Matters, the use of mobile ballot boxes is generally discouraged due to a high risk of fraud. However, if utilized, stringent measures should be implemented to mitigate any potential fraud. In this regard, it would be beneficial to include an additional section in the vote count records detailing the number of voters who cast their ballots using the electoral lists at the place of their stay. Currently, post-election analysis by the CEC of the extent of „mobile ballot box voting” is nearly impractical. The influence of this factor could be critical, especially in the context of local elections.

CHAPTER XIII

POST-ELECTORAL PERIOD

According to Article 174, paragraphs (2) and (3) of the Electoral Code, district electoral councils are required to confirm or reject the legality of elections in their respective electoral districts within a maximum of 10 days from receiving the electoral documents from electoral offices or, if applicable, DEC I. This confirmation or rejection can only occur after all lodged complaints have been finally resolved by the electoral bodies and courts, following established procedures. Once the legality of the elections is confirmed, these constituency electoral councils are then responsible for declaring candidates elected, allocating and validating the mandates of elected councillors and mayors, and confirming the list of alternate candidates, with decisions adopted to reflect these actions.

Promo-LEXEOM identified at least four instances where complainants claimed that electoral bodies confirmed the legality of elections prior to the final resolution of disputes, indicating a potential deviation from the procedural requirements set forth in the Electoral Code.

- 1) On November 14, 2023, the District Electoral Council (DEC) 25/1 in Orhei adopted a decision to confirm the legality of the general local elections held on November 5, 2023, in the Orhei municipal constituency No. 25/1 and to validate the mandate of the mayor of Orhei municipality, Orhei district. This decision was made despite the fact that the electoral contestant, Sergiu Stanciu, had submitted a notification to the Central Electoral Commission (CEC) and the Orhei DEC on November 4, 2023, filed a complaint to the CEC on November 7, 2023, and made a preliminary request to the CEC on November 15, 2023¹⁹¹. All these submissions were pending examination by the DEC.
- 2) On November 6, 2023, the DEC No. 1/4 in Sîngera issued a decision to confirm the legality of the general local elections held on November 5, 2023, in the Sîngera 1/4 municipal constituency and to validate the mandate of the mayor of the town of Sîngera, municipality of Chisinau. Additionally, Decision No. 49 was adopted to confirm the legality of the elections and validate the mandates of councillors. A complainant¹⁹² argued that these decisions were made within the legal timeframe allowed for filing complaints (3 days) and claimed that several complaints submitted within this period had not yet been reviewed. Specifically, regarding a complaint filed on November 7 to the electoral bodies, the DEC of 1/4 Sîngera deemed the complaint inadmissible, reasoning that the council had already confirmed the election results on November 6 and found no discrepancies in the minutes summarizing the voting outcomes.

¹⁹¹ CEC [Decision](#) No. 1643 from 28.11.2023 on complaints No. CEC-7/10682 of 21 November 2023 from Mr. Sergiu Stanciu, candidate for mayor of Orhei municipality nominated by the Political Party "Action and Solidarity Party", and No. CEC-7/10856 of 23 November 2023 from the Security and Intelligence Service.

¹⁹² Ion Duca, [preliminary request](#) submitted to the DEC Sîngera for the annulment of the Decision No 48 of 6 November 2023 of the DEC Sîngera 1/4 and [preliminary request](#) submitted to the CEC for the annulment of the Decision No 51 of 13 November 2023 of the DEC Sîngera 1/4.

- 3) On November 22, 2023, the District Electoral Council (DEC) 25/11 in Cucuruzeni made a decision to confirm the legality of the general local elections held on November 19, 2023, in the Cucuruzeni communal constituency No. 25/11, Orhei district, and to validate the mandate of the mayor of Cucuruzeni commune, Orhei district. This decision was made despite the fact that electoral competitor Nicolae Ipolitov had filed a complaint with both the Central Election Commission (CEC) and DEC 25 Orhei on November 21, 2023.¹⁹³
- 4) On December 1, 2023, the DEC 1/8 in Bubuieci decided to invalidate the legality of the elections even though there were still complaints being examined.¹⁹⁴

At the same time, in some constituencies, (such as the villages of Avdarma and Bugeac in the Autonomous Territorial Unit of Gagauzia (ATUG), the legality of elections and the validation of mandates were confirmed including on the day of November 5, 2023. In view of the above, the following conclusions can be drawn:

- There is no mechanism for electoral bodies to verify whether there are outstanding electoral complaints with higher hierarchical bodies or courts.
- In instances where electoral bodies confirmed the legality of elections and validated mandates within the complaint lodging period (3 days from election day), the right to an effective appeal was compromised.
- The current procedure for confirming or denying the legality of elections lacks the formality, publicity, adversarial nature, and equality of the parties that were present in the previous procedure conducted through the courts.

As of mid-January, two months after the elections, the mandates of local elected representatives had not been validated in the following constituencies:

- a) Bubuieci village, Chisinau municipality - the mayor's mandate;¹⁹⁵
- b) Calfa village, Anenii Noi district - the mayor's mandate and the mandates of local councillors;
- c) Alexandru Ioan Cuza village, Cahul district - the mayor's mandate;
- d) Țibirica village, Călărași district - the mayor's mandate;
- e) Nicoreni village, Drochia district - mayor's mandate.

The disputes over the confirmation or invalidation of the legality of the elections extended well beyond the designated period, continuing at least until the end of January. Notably, the controversies involved the "Chance" Party and the CSE (regarding the annulment of the registration of the party's candidates)¹⁹⁶ and the dispute between Leonid Umanet and the DEC of Chisinau, DEC 1/8 of Bubuieci (regarding the copy of the study certificate). These were still under review at the Chisinau Court of Appeal and, respectively, at the Supreme Court of Justice. Consequently, the electoral period significantly surpassed the 120-day limit stipulated in Article 1 of the Electoral Code. Promo-LEX Election EOM further observed that the process of confirming/denying the legality of the elections and validating the mandates in this election spanned longer than in the general local elections of 2019.¹⁹⁷

Under Article 46 of the Electoral Code, the dissolution of first-level district electoral councils and bureaus established in accordance with this Code is automatic upon the confirmation of election results and mandate validations by the relevant authority. However, this dissolution is contingent on the resolution of all electoral period complaints. Similarly,

193 [SCJ Conclusion](#) in the case of Nicolae Ipolitov vs DEC Orhei 25, DEC Cucuruzeni 25/11.

194 [SCJ Decision](#) from 11.01.2024 in the case of Leonid Umanet vs DEC Chișinău 1, DEC Bubuieci 1/8.

195 For this constituency, the CEC declared the results of the elections for mayor of com. Bubuieci, mun. Chisinau and set the repeat vote for 11 February 2023.

196 Litigation "Chance" Party vs. CES on the annulment of the CES provision ordering the cancellation of the registration of candidates nominated by the PS.

197 Confirmation of the legality of the elections (20 October 2019) and validation of local councils took place from 28 October to 15 November, confirmation of the legality and validation of district councils - from 24 October to 6 November, and validation of mayors' mandates for the second round (3 November 2019) - from 6 November to 20 November.

the duties of members of the second-level constituency electoral council, excluding the chairperson, conclude upon election result confirmation and mandate validation, again contingent on the final resolution of all lodged complaints. This regulatory framework might inadvertently encourage members of electoral bodies to bypass the comprehensive review process, including verifying the existence of complaints and confirming election legality, due to the potential for expedited dissolution or termination of duties.

Promo-LEX EOM observed instances where electoral body representatives cited the automatic dissolution of these bodies upon election result confirmation as justification for not addressing complaints. An instance on 23 November 2023 involved the CEC being notified by the President of DEC II Chisinau that DEC II members had ended their activities on 21 November 2023. Consequently, a complaint against the decision of DEC Bubuieci 1/8 dated 19 November 2023 was forwarded to the Central Electoral Commission¹⁹⁸. The President of DEC II then redirected additional complaints¹⁹⁹ to the CEC for resolution. Despite this, on 27 and 28 November,²⁰⁰ the CEC reiterated the necessity for DEC Chisinau to adjudicate the complaints as the competent authority. This indicates that in the case of mun. Chisinau, DEC II might have prematurely ceased operations before the official dissolution of electoral councils and bureaus responsible for the second election round.

The process of confirming or denying the legality of elections must adhere to the stipulation that it cannot commence until at least three days post-election day, ensuring electoral bodies are not prematurely dissolved. It's important to highlight that the legislator's condition for the dissolution of electoral bodies or the cessation of electoral council members' activities suggests that DEC II, as a higher hierarchical entity, is responsible for addressing appeals submitted to lower electoral bodies, namely DEC I and PEB. Consequently, it is unjustifiable for DEC II to cease its activities before the dissolution of DEC I and PEB, ensuring that the electoral process's integrity and the resolution of appeals are maintained until all electoral bodies have properly concluded their duties.

198 [Letter](#) to the President of the DEC II Chisinau dated 23.11.2023 to submit the complaint.

199 [Preliminary request](#) submitted by Ion Duca, candidate for local councillor Sîngera; [complaint](#) submitted by Leonid Umanet, candidate for mayor Sîngera from 23.11.2023.

200 CEC [Letter](#) No. 8/3871 from 27.11.2023; CEC [Letter](#) No. 8/3879 from 28.11.2023.

RECOMANDATIONS

To the Parliament of the Republic of Moldova:

1. Amend the definition of “electoral period” in Article 1 of the Electoral Code to replace the phrase “between the day of adoption of the act” with “between the day of entry into force of the act”.
2. Review the definition of *administrative resources* in accordance with the formulation provided by the Venice Commission.
3. Evaluate the suitability of adding a new restriction to the list of incompatibilities and restrictions on the activity of members of the Council and the electoral bureau as outlined in Article 42, paragraph (1) of the Electoral Code, specifically prohibiting them from acting as interim mayors.
4. Modify the Law on the State of Emergency, Curfew, and War Regime to prohibit the conduct of elections during periods when a state of emergency, curfew, or war has been declared.
5. Avoid passing amendments to the electoral legislation during the electoral period or, should there be pressing reasons necessitating an amendment, ensure such changes apply only to future elections.
6. Consider revising the electoral legislation in accordance with recommendations from the Venice Commission Opinion, ensuring that all parties, blocs, and independent candidates not currently represented in the electoral body or a superior body are required to demonstrate minimum support under uniform or similar conditions.
7. Amend Article 165, paragraph (2) of the Electoral Code to include “or at the request of the candidate on the list”. We believe that the candidates on the list should have the right to withdraw their candidacy, not just the political party or electoral bloc that submitted the candidate list.
8. Given the high number of complaints deemed inadmissible, it is recommended to revisit the criteria for inadmissibility in the regulatory framework, removing formal grounds that preclude the substantive examination of complaints.
9. Introduce provisions into Article 46 of the Electoral Code specifying that, to safeguard the right to an effective appeal, the confirmation or denial of the legality of elections should not occur until at least 3 days after Election Day, ensuring all appeals have been duly considered.
10. Introduce amendments to the Electoral Code to more thoroughly regulate political and electoral financing involving “third parties,” ensuring transparency and accountability in the financing mechanisms of electoral campaigns.
11. Consider the prohibition of the nominal political promotion of potential candidates before their official nomination, to maintain the integrity and fairness of the electoral process and prevent undue influence or premature campaigning.

12. Proceed with the administrative-territorial organization reform in the Republic of Moldova to enhance human resource capacities at the primary administrative level.

To the Central Electoral Commission, Centre for Continuous Electoral Training and lower-level electoral bodies:

1. Ensure adherence to the legislation by officially setting the election date in accordance with the Electoral Code's definition of the "electoral period," to uphold the legal framework and ensure clarity and consistency in the electoral process.
2. Amend the *Regulation on the Procedure for Confirming the Legality of Elections, Validating, and Allocating Mayoral and Councillor Mandates*, to include specific provisions that outline which categories of citizens from the State Population Register are to be considered by the Public Services Agency in the calculation of the population of an administrative-territorial unit.
3. Adopt the *Regulation on the Specifics of Conducting the Voting Process over two days*.
4. Ensure transparency by publishing detailed information on the approved budget for the institution, including specific planned expenditures for the elections and the status of their execution.
5. Make all complaints received by the Central Electoral Commission regarding the organization and conduct of the general local elections of 5 November 2023 accessible to the public. This should be done in both the "Entry documents" section and the section dedicated to elections on 5 November 2023 on the Commission's website, promoting transparency and public oversight.
6. Publishing on the web page as soon as possible all requests, applications and accepted decisions on them.
7. Ensure that electoral bodies assess whether mandatory legal conditions are met by examining the registration files of candidates before the elections, rather than post-election. This proactive approach confirms that voters' choices are respected and that only duly qualified candidates are allowed to participate in the electoral process.
8. Commit to swift examination and decision-making on complaints to uphold the principle of effective legal recourse.
9. Give priority to complaints concerning the registration or non-registration of electoral contestants. Prompt resolution of these issues enables candidates to engage in campaigning and allows voters to make informed decisions by getting to know all potential candidates.
10. Create detailed guidelines for electoral contestants outlining the specific jurisdiction for addressing complaints. This should include clear rules on following prior procedures and meeting other conditions for the admissibility of complaints, helping to streamline the process and ensure fairness.
11. Invest in comprehensive training for election officials on how to effectively handle and resolve complaints, especially during local elections.
12. Define and regulate the list of individuals authorized to represent political parties during elections, including specifying the required documents for confirmation. This should be included in the *Regulation on the Procedure for Complaints Consideration during the Electoral Period*.
13. Revise the process for confirming or denying the legality of elections to align with the stipulations in Article 174, paragraph (2) of the Electoral Code. This entails not confirming or denying the legality of elections until all complaints have been conclusively resolved by the relevant electoral bodies and courts, ensuring all grievances are adequately addressed before finalizing election results.
14. Implement a verification process at the registration stage by the CEC for cases where there are allegations of non-compliance with the rule mandating a minimum quota of 40% for the representation of either gender on the list of candidates for first-level councillor positions.

15. Enhance the transparency of financial reporting related to elections by ensuring the publication of financial data adheres to open data principles.
16. Mandate the publication of amended financial statements for all electoral contestants.
17. Develop comprehensive guidelines that detail the expenditure categories within financial reports and clarify the types of expenses that correspond to each category.
18. Simplify model reporting forms by eliminating expenditure categories that allow electoral contestants excessive discretion in how they report expenses.
19. Ensure timely provision of technical and material support to lower electoral bodies to facilitate their operations without impediments.
20. Implement a policy where election officials are certified only after undergoing comprehensive training.
21. Incorporate a dedicated sub-section titled "*Certification of Election Officials*" within the "General Local Elections 2023" segment and similar future sections on the Central Electoral Commission (CEC) website. Although this information may partially exist on the CICDE (Center for Continuous Electoral Training) webpage, aggregating and displaying it fully in a single, accessible location is crucial for providing comprehensive and convenient information to all stakeholders involved.
22. Implement ongoing training programs for individuals listed in the Register of Electoral Officials in order to maintain and strengthen their qualifications.
23. Prevent obstruction of the organization of public electoral debates as measures of electoral education, which, in accordance with the Electoral Code, may be conducted by civil society organizations and groups, educational institutions, the media, and other interested parties. These activities aim to enhance citizens' understanding of political and electoral processes to ensure the exercise of an informed and freely expressed vote.
24. To develop a procedure for submitting complaints filed by electoral for the referral of complaints from electoral contestants regarding alleged cases of hate speech and/or incitement to discrimination to the General Inspectorate of Police.
25. To carry out regular activities, in collaboration with the General Inspectorate of Police, the Audiovisual Council, the Equality Council, and civil society organizations, for members of electoral bodies and for employees on the recognition and identification of hate speech and other forms of intolerance, and promotion of existing national mechanisms for combating hate speech and/or incitement to discrimination.

To the Government of the Republic of Moldova/Commission for Emergency Situations:

1. Avoid interference in the organization and management of elections, and in cases like the suspension of licenses for six TV stations, offer comprehensive explanations of the factual and legal circumstances that justify such restrictive measures.

To the Public Services Agency

1. Post on the institution's website, in a dedicated section, the population data from the State Population Register for administrative-territorial units (levels I and II), which are submitted to the Central Electoral Commission to determine the number of council seats.
2. Form a working group, involving representatives from the Central Electoral Commission and the Corjova commune mayor's office, aimed at ensuring all voters are included in the primary electoral lists for Corjova commune.
3. Collaborate with the Central Electoral Commission to establish a mechanism or procedure for removing deceased persons from electoral lists, especially those who passed away abroad, in cases where confirmatory documents are absent but local authorities provide confirmation.

To the Local Public Administration

1. Draft, approve, and publish regulations regarding the suspension of mayors (and other relevant positions) and the delegation of their powers, without anonymizing the names/signatures of the involved individuals, as this constitutes information of public interest to the society/community.
2. Exercise the authority granted by the Electoral Code to delegate members to subordinate electoral bodies effectively and transparently.
3. Ensure that buildings of public utility, where polling stations and electoral offices are set up, are accessible to all voters, including those with disabilities.
4. Provide comprehensive and timely support to electoral bodies in fulfilling their duties, including adequate space, necessary working equipment, and proper thermal conditions (electricity, heating).

To the Courts

1. Give priority to complaints regarding the registration or non-registration of electoral competitors. This ensures they have the opportunity to participate in campaigning and allows voters to familiarize themselves with all candidates, facilitating a more informed voting decision.
2. Address disputes related to the electoral process, especially cases like PŞ v. CES, within a specified, limited timeframe. This approach enables electoral bodies to make timely decisions on confirming the legality of elections and the validation of mandates, ensuring the integrity and efficiency of the electoral process.

To the General Police Inspectorate

1. To develop a bilateral referral procedure between GPI and AA in cases of hate speech and/or incitement to discrimination in audiovisual media where the authors are the guests of the shows (application of the AC to the GPI) or moderators (application of the GPI to the AC).
2. To carry out regular training activities for police officers on hate speech and/or incitement to discrimination, as well as other forms of intolerance in order to effectively apply the contravention provisions on hate speech.
3. To promote the mechanism for notifying the Police in cases of hate speech and/or incitement to discrimination among the general public by initiating information campaigns.

To the Audiovisual Council

1. To further develop the internal mechanism for monitoring hate speech in audiovisual media by collecting disaggregated data.
2. To continue to carry out regular training activities for members and employees on identifying cases of hate speech, incitement to discrimination or other forms of intolerance.

To Political Parties

1. Implement a system where political parties train their members who are potential candidates for electoral body positions, with the Central Electoral Commission and the Center for Continuous Electoral Training subsequently certifying these members.
2. To monitor compliance with their own Codes of Conduct, and in the absence thereof, to take over the Code of Conduct proposed by the CEC as an internal self-regulatory tool.
3. To condemn hate speech and use national mechanisms to screen and sanction hate speech whenever targeted by such speech.
4. To conduct regular training activities for party members, especially those who are nominated candidates for elective positions and communicators on hate speech, sexism, racism, homophobia and other forms of intolerance.

ABREVIATIONS

- AC** – Audiovisual Council
ALDE – Alliance of Liberals and Democrats for Europe
ANI – National Authority for Integrity
art. – article
ATU – Administrative-Territorial Unit
ATUG – Autonomous Territorial Unit Gagauzia
BE Ruslan Codreanu – Electoral Bloc „Ruslan Codreanu”
CC – Common Action Political Party - Civil Congress
CEC – Central Electoral Commission
CES – Commission for Emergency Situations
CICDE – Center of Continuous Electoral Training under the CEC
CPA – Central Public Authorities
CUB –Coalition for Unity and Welfare Political Party
d. – district
EOM – Election Observation Mission
EU – European Union
IC –Independent Candidate
FASM –Alternative and Salvation Force of Moldova Political Party
GPI – General Police Inspectorate
LGBTQI – lesbians, gay, bisexuals, transgenes, queer and intersex
LOC –League of Towns and Communes Political Party
LPA – Local Public Administration
LTO – Long-Term Observer
MAN – National Alternative Movement Political Party
MIA – Ministry of Internal Affairs
MPSN – “Speranta – Nadejda” Professional Movement, Political Party
MRM –Respect Moldova Movement Political Party
mun. – municipality
No. – number
NOI – New Historical Option Political Party
OM – Observation Mission
OSCE/ODIHR – OSCE Office for Democratic Institutions and Human Rights
PC – Conservative Party
PACE – Building Europe at Home Political Party
para. – paragraph
PAS – Political Party of Action and Solidarity
PCRM – Communist Party of the Republic of Moldova

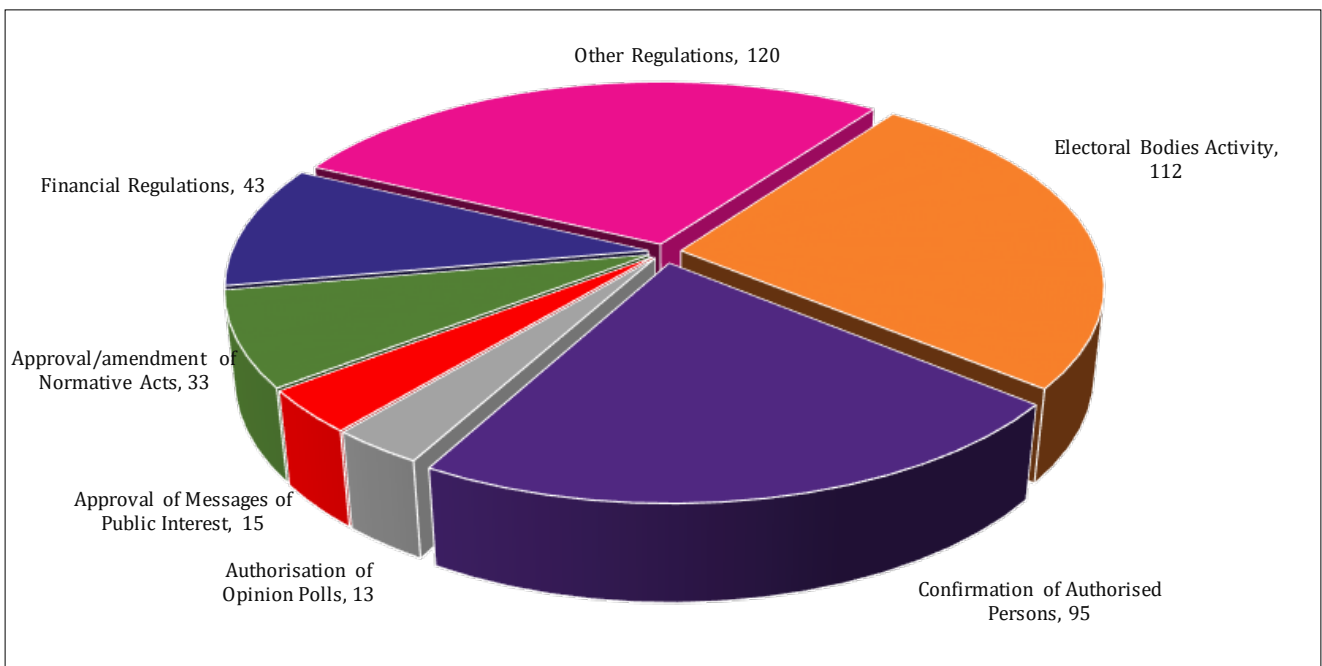
PDCM – Party of Development and Consolidation of Moldova
PDMM – Modern Democratic Party of Moldova
PEB – Precinct Electoral Bureau
PL – Liberal Party, Political Party
PLDM – Liberal Democratic Party of Moldova
PPN – „Our Party” Political Party
PNL – National Liberal Party
PNM – Moldovan National Party
PONA – Political Party “For People, Nature and Animals”
PPDA – „Democracy at Home” Political Party
PPFD – „Diaspora’s Force” Political Party
PPPN – „We” Political party
PPPDA – Dignity and Truth Platform, Political Party
PPPO – “People’s Power” Political Party
PPRM – People’s Party of the Republic of Moldova
PPVP – “People’s Will” Political Party
PR – „Revival” Political Party
PS – Party of Change, Political Party
PSDE – European Social Democratic Party
PSRM – Party of Socialists of the Republic of Moldova, Political Party
PŞ – “CHANCE” Political Party
PVE – Green Ecologist Party, Political Party
REO – Registry of Electoral Officials
SAISE – State Automated Information System “Elections”
SCJ – Supreme Court of Justice
STO – Short-Term Observer
TO – Territorial Organization
UCSM – Christian Social Union of Moldova, Political Party
USAID – United States Agency for International Development.

ANNEXES

Annex No. 1. Activity of the Central Electoral Commission

Chart No. 1.1.

Thematic Content of CEC Decisions



National Observers				Total
Promo-LEX Association	998	Institute for Human Rights in Moldova	29	1118
Public Association "MIRAD"	47	Public Association "Centre for Educational and Community Development (CDEC)"	21	
Association for Urban Safety and Mediation of Moldova	2	Association for Participatory Democracy "ADEPT"	2	
Public Institution "Centre for Continuous Electoral Training"	17	East European Foundation	2	
International Observers and Experts				
Embassy of the Czech Republic	2	Embassy of the Republic of Lithuania	4	397
Embassy of the Kingdom of the Netherlands	6	Embassy of the Republic of Slovenia	1	
Embassy of the Republic of Finland	3	Embassy of the French Republic	5	
Embassy of the Republic of Austria	4	Embassy of the Federal Republic of Germany	5	
Embassy of Japan	4	Embassy of the Federal Republic of Germany	5	
Embassy of the Republic of Hungary	31	The Embassy of the United Kingdom of Great Britain and Northern Ireland in Bucharest	5	
Hungarian Embassy	1	Embassy of the Kingdom of Sweden	5	
Embassy of the Republic of Latvia	2	Permanent Electoral Authority of Romania	1	
Central Election Commission of Georgia	3	Consulate General of the Republic of Turkey in Comrat	6	
Central Elections and Referendums Commission of the Kyrgyz Republic	2	Central Election Commission of the Republic of Lithuania	2	
State Electoral Commission of the Republic of Croatia	2	Supreme Electoral Council of the Republic of Turkey	2	
Central Election Commission of the Republic of Armenia	2	Central Election Commission of the Republic of Albania	2	
Central Election Commission of the Republic of Uzbekistan	2	Central Election Commission of Ukraine	2	
Central Election Commission of the Republic of Azerbaijan	3	Central Election Commission of the Republic of Kazakhstan	3	
OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR)	235	National Electoral Committee of the Republic of Estonia	2	
Swiss Cooperation Office/Representation of the Embassy of the Swiss Confederation	1	European Network of Election Monitoring Organizations (ENEMO)	11	
Congress of Local and Regional Powers of the Council of Europe	20	Pro Democracy Club Association Târgu-Neamț	1	
European Parliament	12			
Confirmed Interpreters				
OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR)	140	Consulate General of the Republic of Turkey in Comrat	2	159
European Network of Election Monitoring Organizations (ENEMO)	5	Congress of Local and Regional Powers of the Council of Europe	9	

201 Accreditation of Observers.

Table No. 1.3.

Journalists Approved by CEC²⁰² and DEC II

Private Institution "Radio Orhei"	1	Limited Liability Company "MEDIA VOICE"	11
Independent Periodical "Observatorul de Nord"	7	Branch of the Romanian Television Company	4
Regional TV station "Elita TV"	2	Public Association "Pilgrim-Demo"	9
LLC "Ecolu nostru" Periodical Publication	3	Public Association "Alternative Media"	2
Press Group REALITY	9	European PressPhoto Agency	1
"NEWS MAKER" Limited Liability Company	7	ORIZONT TV	36
Enterprise with Foreign Capital "REFORMA ART" LLC	1	Regional Television "ITV Moldova"	23
Regional Television "Gagauziya Radio Television"	9	News portal Est Curier	4
Ziuadeazi.md News Portal	2	Freelancer	1
Total			132

Table No. 1.4.

Approved Public Interest Messages²⁰³

UN Women	2 video spots
National Center for Child Abuse Prevention	1 video spot
CONTACT Center Public Association	1 informative-educational video spot
Central Electoral Commission	13 video spots; 1 info booklet; 1 information leaflet; 5 information posters
Centre for Continuous Electoral Training	2 informative video spots
Council of Europe Office in Chisinau	1 informative video spot
Promo-LEX Public Association	2 informative video spots
Total	29

Table No. 1.5.

Authorization of Opinion Polls and Exit Polls²⁰⁴

Authorization for Conducting Opinion Polls	16
"IMAS-RESEARCH AND STRATEGIES" LLC	1
"INTELLECT GROUP" LLC	6
"SMART DATA" LLC	3
CC "MAGENTA CONSULTING" LLC	1
"MLD MEDIA" LLC	1
Small Enterprise "C.B.S.-RESEARCH" LLC	3
"SIMPALS" LLC	1
Authorization of Publication of Opinion Polls	5
Public Association Institute for Public Policy	1
CC "MAGENTA CONSULTING" LLC	1
National Democratic Institute for International Affairs, Washington, Chisinau Branch	3
Denials of Permission to Conduct Polls	1
"INTELLECT GROUP" LLC	1

202 [Confirmation of](#) Journalists.203 [Approval](#) of Public Interest Messages204 [Authorization](#) of Opinion Polls and Exit Polls

Annex No. 2. Accessibility and Location of the Lower-level Electoral Bodies Offices

Chart No. 2.1.

Physical Accessibility of DEC II Premises

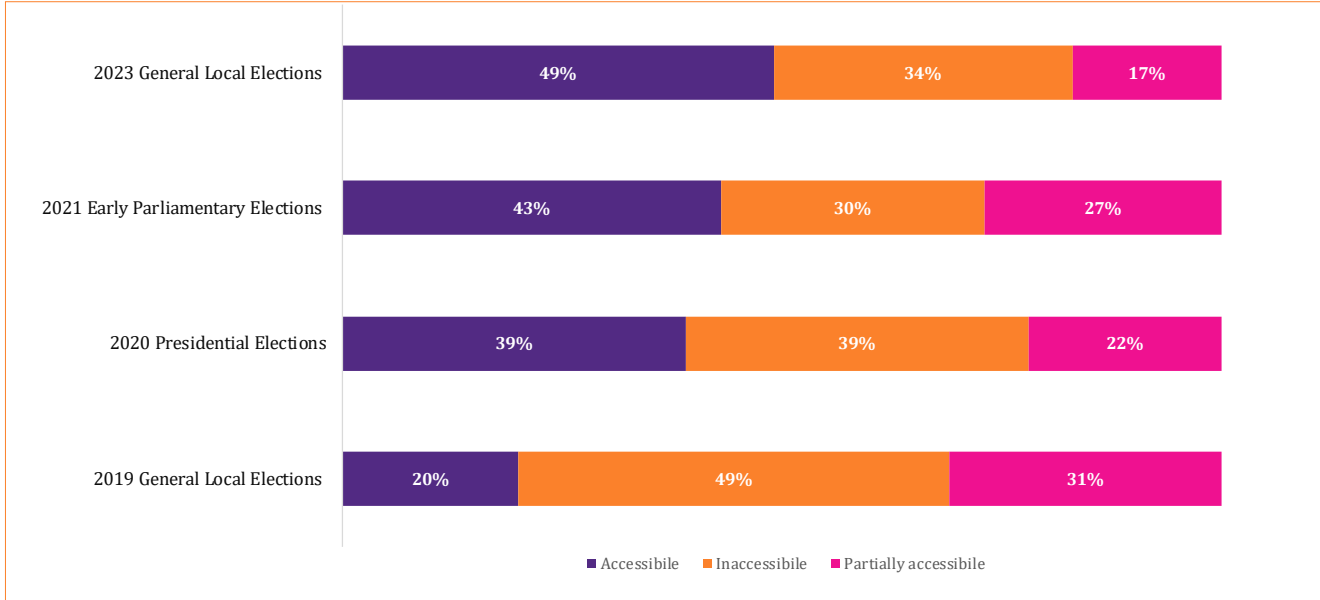
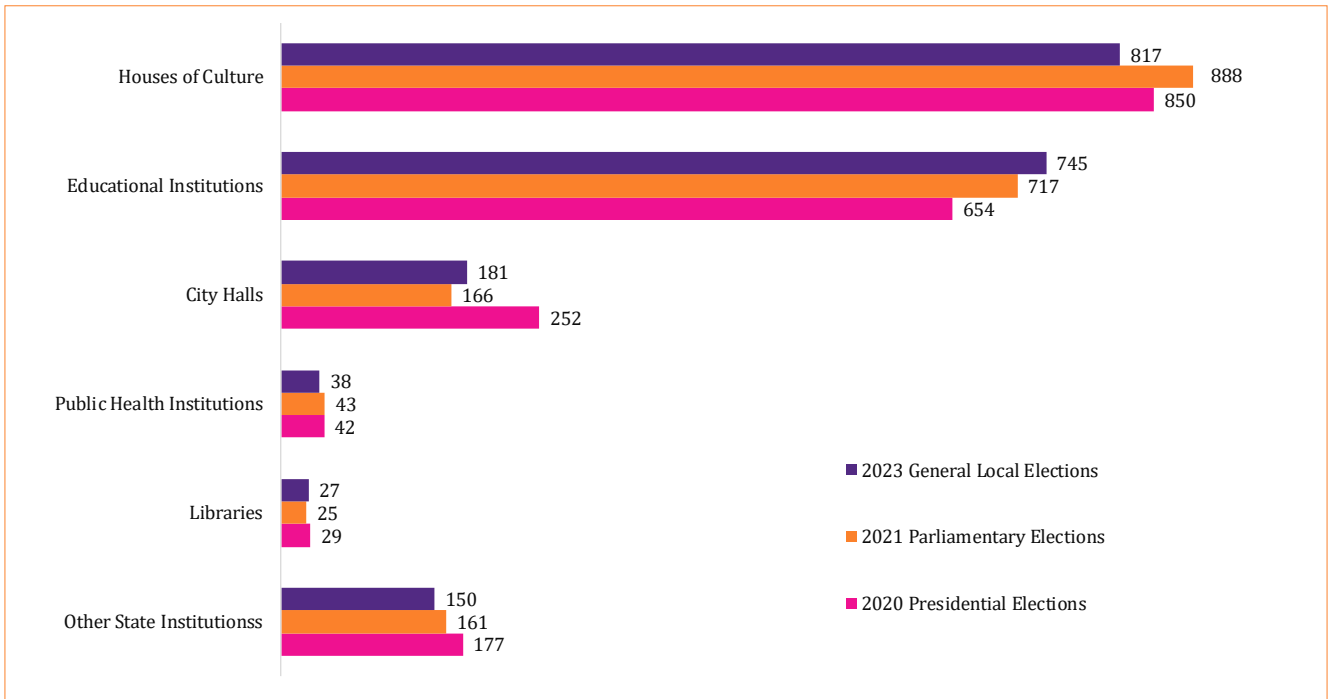


Chart No. 2.2.

Location of PEB / Polling stations Offices



Annex No. 3. Organization of Electoral Meetings within Public Institutions during Working Hours

Competitor Name	No.	Date	Location	Public Institution
CC	1	24.10.2023	Soroca, Soroca	"Mihai Eminescu" College
CI Anastasov Serghei	1	20.10.2023	UTAG, Comrat	Kindergarten
IC Vrabie Vitalie	1	17.10.2023	Ungheni	"Solnyshko" Kindergarten
	2	18.10.2023	Ungheni	"Licurici" Kindergarten
	3	20.10.2023	Ungheni	TL "Ion Creangă"
	4	31.10.2023	Ungheni	"Tereza Sobolevschi" Kindergarten
CUB	1	06.10.2023	Chişinău, Center	IMSP Municipal Clinical Hospital of Phthisiopneumology
MRM	1	01.11.2023	Ungheni, Pârlița	Kindergarten
	2	01.11.2023	Ungheni, Pârlița	TL "Alexei Mateevici"
PACE	1	31.10.2023	Bălți	Preschool Institution No. 23
	2	01.11.2023	Bălți	TL „Mihai Eminescu”
PAS	1	09.10.2023	Chişinău, Botanica	TL "Iulia Hasdeu"
	2	10.10.2023	Chişinău, Râşcani	TL „Nicolae Milescu Spătaru”
	3	11.10.2023	Chisinau, Center	Republican Diagnostic Center
	4	17.10.2023	Rezina	Electricity Distribution Networks Nord SA
	5	19.10.2023	Bălți	"Alexandru Ioan Cuza" Gymnasium
	6	26.10.2023	Dubăsari, Molovata	School
	7	26.10.2023	Ungheni	"Dimitrie Cantemir" Public Library
	8	26.10.2023	Bălți	TL "Lucian Blaga"
	9	31.10.2023	Cantemir	"Mihai Eminescu" Gymnasium
PCRM	1	10.10.2023	Chisinau, Center	TL "Mikhail Kotsyubinsky"
PDCM	1	18.10.2023	Dubăsari, Coşnița	Kindergarten
	2	19.10.2023	Chisinau, Center	IMSP Center Territorial Medical Association
	3	19.10.2023	Dubăsari, Coşnița	School
	4	20.10.2023	Dubăsari, Coşnița	Moldovagaz SA, subsidiary. Dubăsari
	5	28.10.2023	Chişinău, Râşcani	"Sfânta Treime" Municipal Clinical Hospital
	6	02.11.2023	Bălți	TL "Lucian Blaga"
PLDM	1	17.10.2023	Ungheni	TL "Gheorghe Asachi"
	2	18.10.2023	Ungheni	"Guguta" Kindergarten
	3	19.10.2023	Ungheni	Territorial Social Insurance Fund
	4	23.10.2023	Ungheni	"Licurici" Kindergarten
	5	31.10.2023	Ungheni	Center for Elderly People
	6	01.11.2023	Ungheni	Ungheni Gaz SA
	7	01.11.2023	Ungheni	District Hospital
	8	02.11.2023	Soroca	"Mihai Eminescu" College
	9	03.11.2023	Ungheni	"Dimitrie Cantemir" Public Library
PPPDA	1	23.10.2023	Chişinău, Râşcani	„Sfânta Treime” Hospital
	2	24.10.2023	Chişinău, Râşcani	TL "Alexandru Ioan Cuza"

Competitor Name	No.	Date	Location	Public Institution
PR	1	19.10.2023	Chisinau, Center	TL "Mihai Viteazul"
PSDE	1	16.10.2023	Ungheni	RED Nord SA Ungheni
	2	18.10.2023	Ungheni	TL "Ion Creangă"
	3	19.10.2023	Chisinau, Center	Institute of Neurology and Neurosurgery
PSRM	1	10.10.2023	Chisinau municipality, Botanica	TL "Dimitrie Cantemir"
	2	11.10.2023	Chisinau municipality, Ciocana	IMSP Ciocana Territorial Medical Association
	3	11.10.2023	Chisinau, Center	IMSP Center Territorial Medical Association
	4	12.10.2023	Chisinau, Riscani	TL "Nicolae Milescu Spataru"
	5	12.10.2023	Chisinau, Center	Center of Family Physicians No. 7
	6	13.10.2023	Bălți	Psychiatric Hospital
	7	16.10.2023	Chisinau, Center	IMSP Republican Dental Municipal Center for Children
	8	19.10.2023	Chisinau municipality, Cricova	Kindergarten
	9	20.10.2023	Chisinau, Riscani	ME Green Spaces Management Association
	10	25.10.2023	Taraclia	Gymnasium No. 3
	11	25.10.2023	Chisinau municipality, Ciocana	ME Liftservice
	12	25.10.2023	Chisinau, Center	Institute of Neurosurgery
	13	26.10.2023	Chisinau, Center	Blood Transfusion Center
	14	30.10.2023	Chisinau, Center	Institute of Oncology

Annex No. 4. Instances of Potential Voter Bribery

Competitor Name	Location	Period	Activity
PȘ	The territory of the Republic of Moldova	electoral period	Collecting signatures for the "Moldovan Village" and "Moldovan City" projects
	ATUG	14.10.2023	Distribution of Envelopes Containing 500 Lei to Teachers at the Teachers' Day Event Organized by the ATUG Administration
	Dubăsari, Pârâta	22.10.2023	A recreational event was arranged for the residents of the village, offering children the chance to enjoy a slide, with the activities moderated by two animators. For adults, a raffle was held with prizes including 6 teapots, an electric stove, and 10 boxes of biscuits. Participants were also provided with juice (small boxes – approximately 70), still water, ice cream, and cakes. During the event, three volunteers, without any visible affiliation signs, distributed electoral flyers for the PȘ candidate.
	Taraclia	18.10.2023	The Interim mayor of Taraclia, Marta Chemengeji, announced that the City Hall had received the promised donation from sponsors (whose identities were not disclosed) during the City Day in May – four GAZEL minibuses. The information was disseminated on social networks by Veaceslav Lupov, the suspended mayor and independent candidate, supported by Ilan Shor and the PȘ (t the PȘ campaign launch event in Taraclia on October 15, 2023, Veaceslav Lupov appeared on stage alongside PȘ candidates).
PAS	Briceni, Șirăuți	31.10.2023	16 sports uniforms were donated for the football team of the Gymnasium "Haiducii juniori"
	Soroca, Bulboci	22.10.2023	The mayoral candidate of the locality organized an excursion for the ninth-grade students of the local school to the Prut River meadow in Costești, the Costești-Stânca reservoir, and the „Suta de movile” nature reserve.
PLDM	Ungheni	27.10.2023	PLDM candidate for mayor of Ungheni, Lidia Sanduleac, made a donation to three families in the city: 6 pillows, 3 sacks of potatoes and other food.
CI Zagorcea Iurie	Edinet, Bleșteni	27.10.2023	Financially supported by children and friends from abroad through the Association of Bleșteni-Volodeni Natives, the candidate reportedly donated a washing machine and a dryer to the local community center.

PR	10.10.2023		29.09.2023	06.10.2023	Submitted	Submitted	Submitted	Submitted	10.11.2023	Submitted	Submitted
PS	12.10.2023		09.10.2023	info	Submitted	Submitted	Submitted	Submitted	10.11.2023	19.11.2023	22.11.2023
PSDE	06.10.2023	06.10.2023	29.09.2023	06.10.2023	Submitted	Submitted	Submitted	Submitted	10.11.2023	17.11.2023	Submitted
PSRM	06.10.2023	25.09.2023	25.09.2023	07.10.2023	13.10.2023	Submitted	10.27.2023	Submitted	10.11.2023	Submitted	21.11.2023
PŞ	06.10.2023		11.10.2023	06.10.2023	Submitted	Submitted	Submitted	Submitted	N/A	N/A	Submitted
PVE	12.10.2023	10.11.2023	13.10.2023	-	info	Submitted	Submitted	Submitted	10.11.2023	Submitted	Submitted
CI Negru Fiodor				-	-	-	-	-	N/A	N/A	-
CI Guţan Valentin		-	16.10.2023	-	-	25.10.2023	Submitted	Submitted	Submitted	Submitted	Submitted
CI Burlea Ion		-	17.10.2023	-	-	26.10.2023	-	-	N/A	N/A	-
CI Breaşna Pavel				-	-	-	-	-	N/A	N/A	-
CI Sîrbu Sergiu		-	16.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	-
CI Cebotaru Sergiu		-	24.10.2023	-	-	Submitted	Submitted	Submitted	Submitted	Submitted	-
CI Slobozeanu Roman		-	18.10.2024	-	-	-	Submitted	Submitted	N/A	N/A	-
CI Costiuc Nina		-	24.10.2024	-	-	Submitted	Submitted	Submitted	N/A	N/A	Submitted
CI Malu Vladimir		-	10.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	Submitted
CI Jizdan Vadim		-	11.10.2023	-	Submitted	Submitted	Submitted	Submitted	N/A	N/A	Submitted
CI Rusu Tatiana		-	16.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	Submitted
CI Cimpoş Valentin		-	16.10.2023	-	-	Submitted	Submitted	Submitted	Submitted	Submitted	Submitted
CI Urechean Radu		-	19.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	Submitted
CI Dandiş Nicolae		-	13.10.2023	-	-	-	-	13.11.2023	N/A	N/A	Submitted
CI Moruz Dmitri		-		-	-	-	-	-	N/A	N/A	Submitted

CI Musteață Valeriu		-		-	-	-	-	-	N/A	N/A	Submitted
CI Nasulea Ion		-		-	Submitted	-	-	-			-
CI Vdovicenco-Minciuna S.		-	24.10.2023	-	-	-	Submitted	Submitted	N/A	N/A	-
CI Guzun Ion		-	24.10.2023	-	-	-	Submitted	Submitted	N/A	N/A	Submitted
CI Țurcanu Ion		-	06.10.2023	-	12.11.2023	-	12.11.2023	12.11.2023	N/A	N/A	Submitted
CI Bivol Cristina		-	13.10.2023	-	13.11.2023	-	13.11.2023	13.11.2023	24.11.2023	24.11.2023	Submitted
CI Belciug Ivan		-	23.10.2023	-			Submitted	Submitted	N/A	N/A	-
CI Nicu Anatolie		-		-	-	-	-	-	N/A	N/A	-
CI Tureac Alexandru		-	11.10.2023	-	Submitted	-	Submitted	Submitted	N/A	N/A	Submitted
CI Zavroțchii Dmitrii		-	23.10.2023	-	-	-	Submitted	Submitted	N/A	N/A	Submitted
CI Buzu Nicolae		-	20.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	Submitted
CI Marahovschi Victor		-	20.10.2023	-	-	-	Submitted	Submitted	N/A	N/A	Submitted
CI Ipolitov Nicolae		-		-	-	-	-	-	-	-	-
CI Nița Victor		-	30.10.2023	-	-	-	Submitted	Submitted	Submitted	Submitted	-
CI Cuzuioac Ghenadie		-	12.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	-
CI Mursa Olga		-	06.10.2023	-	-	-	-	Submitted	N/A	N/A	-
CI Jardan Viorel		-		-				Submitted	Submitted	Submitted	Submitted
CI Damian Nicolae		-	17.10.2023	-	-	-	Submitted	Submitted	N/A	N/A	Submitted
CI Gaina Tamara		-	19.10.2023	-	-	-	-	-	N/A	N/A	Submitted

CI Vrabie Vitalie		-	11.10.2023	-	Submitted	Submitted	Submitted	Submitted	Submitted	Submitted	Submitted
CI Filimon Ion		-	13.10.2023	-	Submitted	Submitted	Submitted	Submitted	N/A	N/A	Submitted
CI Lipcan Pavel		-		-	-	Submitted	Submitted	Submitted	N/A	N/A	Submitted
CI Timofti Nicolae		-		-		Submitted	Submitted	-	N/A	N/A	Submitted
CI Dudoglo Nicolai		-	11.10.2023	-	-	Submitted	Submitted	Submitted	-	-	-
CI Anastasov Serghei		-		-	-	Submitted	Submitted	Submitted	-	23.11.2023	-
CI Chiulafli Serghei		-	17.10.2023	-	-	-	Submitted	Submitted	N/A	N/A	-
CI Levintii Dmitrii		-	26.10.2023	-	-	-	Submitted	Submitted	N/A	N/A	-
CI Gheorghiu Veaceslav		-	16.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	-
CI Topal Anatoli		-	12.10.2023	-	Submitted	Submitted	Submitted	Submitted	N/A	N/A	-
CI Carapirea Nicolai		-	13.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	-
CI Uzun Anatoli		-	18.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	-
CI Zlatovcen Ivan		-	18.10.2023	-	-	Submitted	Submitted	-	N/A	N/A	-
CI Garizan Oleg		-	17.10.2023	-	-	Submitted	Submitted	Submitted	-	-	-
CI Fucedji Vadim		-	11.10.2023	-	Submitted	Submitted	Submitted	Submitted	-	-	-
CI Capsamun Vasili		-		-	-	Submitted	Submitted	Submitted	N/A	N/A	-
CI Chiosea Ilia		-	23.10.2023	-	-	-	Submitted	Submitted	N/A	N/A	-
CI Chiciuc Piotr		-	17.10.2023	-	-	Submitted	Submitted	Submitted	N/A	N/A	-
CI Topciu Fiodor		-		-	-	Submitted	Submitted	Submitted	N/A	N/A	-

Annex No. 6. Reported Revenues of Electoral Contestants in the Context of General Local Elections

Competitor Name	Total Revenue	Cash Revenue	Private Source Financial Contributions	Public Source Financial Contributions	Donations from Natural Persons	Donations from Legal Entities	State-provided Interest-free Loans	In-kind Donations
TOTAL	37.629.514	34.796.562	4.016.305	8.847.971	18.931.356	2.880.230	110.000	2.802.546
PSDE	1.419.015	1.129.452	0	690.000	439.452	0	0	289.563
PCRM	202.443	202.443	90.000	112.443	0	0	0	0
MPSN	25.500	25.500	0	7.000	18.500	0	0	0
PL	178.000	178.000	40.000	0	138.000	0	0	0
PSRM	5.937.326	5.001.190	0	3.391.275	1.609.915	0	0	936.136
PVE	26.873	26.873	0	21.973	4.900	0	0	0
PN	2.783.694	2.617.115	100.000	1.965.780	473.835	70.000	0	166.579
PPN	27.000	27.000	0	0	27.000	0	0	0
PNL	171.381	171.381	95.381	0	76.000	0	0	0
PLDM	1.269.248	1.269.248	69.218	85.000	1.045.030	70.000	0	0
PPM	1.500	1.500	0	1.500	0	0	0	0
PPDA	59.516	34.516	0	0	34.516	0	0	25.000
ALDE	142.200	142.200	750	0	131.450	10.000	0	0
PR	2.557.000	2.535.000	0	0	2.335.000	200.000	0	22.000
PPPDA	1.095.410	1.087.910	0	600.000	482.910	5.000	0	7.500
PPFD	102.000	102.000	0	30.000	0	72.000	0	0
PAS	9.467.210	8.966.920	3.246.201	1.900.000	2.059.319	1.761.400	0	500.290
PPVP	55.500	55.500	0	43.000	12.500	0	0	0
CC	222.800	222.800	0	0	222.800	0	0	0
PDMM	189.790	189.790	0	0	189.790	0	0	0
PACE	2.600	0	0	0	0	0	0	2.600
PONA	18.435	18.435	0	0	18.435	0	0	0
PS	509.150	509.150	15.000	0	471.150	23.000	0	0
PDCM	1.398.852	1.387.489	1.783	0	1.330.706	0	50.000	11.363
PŞ	3.744.596	3.194.664	33.690	0	3.160.974	0	0	549.932
FASM	11.163	0	0	0	0	0	0	11.163
CUB	885.173	885.173	0	0	500.173	385.000	0	0
MAN	2.972.551	2.904.330	0	0	2.804.330	50.000	50.000	67.816
PNM	59.000	0	30.000	0	0	0	0	29.000
LOC	244.550	244.550	0	0	171.550	73.000	0	0
MRM	475.438	455.700	0	0	455.700	0	0	19.738
BERC	379.796	221.000	0	0	121.000	100.000	0	158.796
IC GUȚAN Valentin	42.000	42.000	42.000	0	0	0	0	0
IC Burlea Ion	5.070	0	0	0	0	0	0	5.070
IC Sîrbu Sergiu	3.830	3.830	0	0	0	3.830	0	0
IC Cebotaru Sergiu	12.000	12.000	3.000	0	9.000	0	0	0
IC Slobozianu Roman	10.000	10.000	0	0	0	0	10.000	0
IC Costiuc Nina	18.000	18.000	18.000	0	0	0	0	0
IC Malu Vladimir	30.000	30.000	30.000	0	0	0	0	0

Competitor Name	Total Revenue	Cash Revenue	Private Source Financial Contributions	Public Source Financial Contributions	Donations from Natural Persons	Donations from Legal Entities	State-provided interest-free Loans	In-kind Donations
IC Jizdan Vadim	10.026	10.026	10.026	0	0	0	0	0
IC Rusu Tatiana	6.816	6.816	0	0	6.816	0	0	0
IC Cimpoeș Valentin	24.300	24.300	0	0	24.300	0	0	0
IC Dandiș Nicolae	11.875	11.875	11.875	0	0	0	0	0
IC Moruz Dmitri	8.360	8.360	8.360	0	0	0	0	0
IC Musteață Valeriu	0	0	0	0	0	0	0	0
IC Urechean Radu	500	500	500	0	0	0	0	0
IC Nasulea Ion	2.200	2.200	2.200	0	0	0	0	0
IC Vdovicenco-Minciuna Snejana	3.000	3.000	3.000	0	0	0	0	0
IC Guzun Ion	5.520	5.520	5.520	0	0	0	0	0
IC Țurcanu Ion	3.500	3.500	3.500	0	0	0	0	0
IC Bivol Cristina	4.800	4.800	4.800	0	0	0	0	0
IC Belciug Ivan	8.000	8.000	8.000	0	0	0	0	0
IC Tureac Alexandru	8.130	8.130	8.130	0	0	0	0	0
IC Zavroțchii Dmitrii	3.500	3.500	3.500	0	0	0	0	0
IC Buzu Nicolae	3.135	3.135	3.135	0	0	0	0	0
IC Marahovschi Victor	75.000	75.000	0	0	75.000	0	0	0
IC Nița Victor	4.035	4.035	0	0	4.035	0	0	0
IC Cuzuioac Ghenadie	23.000	23.000	23.000	0	0	0	0	0
IC Mursa Olga	365	365	0	0	365	0	0	0
IC Jardan Viorel	6.740	6.740	0	0	6.740	0	0	0
IC Damian Nicolae	10.000	10.000	10.000	0	0	0	0	0
IC Gaina Tamara	0	0	0	0	0	0	0	0
IC Vitalie Vrabie	303.149	303.149	0	0	253.149	50.000	0	0
IC Filimon Ion	3.500	3.500	0	0	3.500	0	0	0
IC Lipcan Pavel	5.000	5.000	0	0	5.000	0	0	0
IC Timofti Nicolae	3.005	3.005	3.005	0	0	0	0	0

Competitor Name	Total Revenue	Cash Revenue	Private Source Financial Contributions	Public Source Financial Contributions	Donations from Natural Persons	Donations from Legal Entities	State-provided Interest-free Loans	In-kind Donations
IC Dudoglo Nicolai	89.300	89.300	0	0	89.300	0	0	0
IC Anastasov Serghei	60.710	60.710	60.710	0	0	0	0	0
IC Chiulafli Serghei	91.400	91.400	0	0	91.400	0	0	0
IC Levintii Dmitrii	0	0	0	0	0	0	0	0
IC Gheorghiu Veaceslav	2.495	2.495	2.495	0	0	0	0	0
IC Topal Anatoli	28.500	28.500	8.500	0	20.000	0	0	0
IC Carapirea Nicolai	0	0	0	0	0	0	0	0
IC Uzun Anatoli	28.200	28.200	0	0	0	0	0	0
IC Zlatovcen Ivan	6.127	6.127	0	0	6.127	0	0	0
IC Garizan Oleg	20.000	20.000	20.000	0	0	0	0	0
IC Fucedji Vadim	7.000	7.000	0	0	0	7.000	0	0
IC Chioseia Ilia	1.565	1.565	0	0	1.565	0	0	0
IC Chiciuc Piotr	126	126	0	0	126	0	0	0
IC Topciu Fiodor	1.026	1.026	1.026	0	0	0	0	0

Annex No. 7. Income Earned by Electoral Competitors with Deviations from Legal Provisions

Legal Framework Violation	Competitor Name	Donation Date	Non-compliant Donation Amount (Lei)	Donor (in case of Legal Entities)
art. 57, para. (4), p. 1), l. e)	ALDE	07.10.2023	8.300	1 Natural Person
	PR	11.10.2023	3300	1 Natural Person
	PȘ	19.10.2023	3.300	1 Natural Person
	CI Guțan Valeriu	17.10.2023	30.300	1 Natural Person
	CI Ghenadie Cuzuioc	17.10.2023	300	1 Natural Person
	PSRM	25.10.2023 - 03.11.2023	154.750	20 Natural Persons
art. 57, para. (4), p. 1), l. a)	CI Vrabie Vitalie	campanie	66.054	1 Natural Person
art. 54, para. (5)	PAS	24.10.2023	50.000	Moldpresa Grup LLC
	MAN	10.10.2023	144	Alfin Protect LLC
art. 57, para. (4), p. 2), l. c)	PLDM	19.10.2023	70.000	Bogdas Trans LLC
		12.10.2023	4.000	Individual Entreprise B. Fortuna
	18.10.2023	25.000	Veles-Ventura LLC	
	23.10.2023	10.000	Panvio-Auto LLC	
	23.10.2023	20.000	Madame Style SRL	
	24.10.2023	10.000	Stâncăuți SRL	
	24.10.2023	10.000	Good Autoservice SRL	
	25.10.2023	10.000	Mini Auto-Grup SRL	
	25.10.2023	10.000	Catalor – IID SRL	
	PAS	21.10.2023	300	Consumer Cooperative of Cania
		21.10.2023	900	Union of Consumer Cooperatives of the town Fălești
		01.11.2023	92.000	Intelect Security SRL
		02.11.2023	50.000	Printnova Studio SRL
		02.11.2023	50.000	Luxiton SRL
		03.11.2023	50.000	Evylu & CO SR.L
		28.10.2023	300	UNIVERSCOOP of Dondușeni
		13.11.2023	10.000	SICOM SRL
		17.11.2023	90.400	Printnova Studio SRL
	PS	16.10.2023	10.000	Vava Trade Invest SRL
	CUB	20.10.2023	137.000	Linacor SC SRL
	MAN	09.10.2023	6.849,32	IE Somes-Hîncu
		10.10.2023	19.533,33	IE Somes-Hîncu
		10.10.2023	239,73	Claus-D SRL
LOC	10.10.2023	50.000	Leader Energy Group SRL	
Total			1.052.970	

Annex No. 8. Declared Expenditures by Electoral Competitors

Competitor Name	TOTAL EXPENSES	Financial Expenditures	Expenditures from In-Kind Donations
TOTAL	37.499.809	34.726.263	2.773.546
PSDE	1.419.015	1.129.452	289.563
PCRM	221.781	221.781	0
MPSN	25.500	25.500	0
PL	178.000	178.000	0
PSRM	5.937.326	5.001.190	936.136
PVE	18.900	18.900	0
PN	2.673.141	2.506.562	166.579
PPN	24.999	24.999	0
PNL	128.329	128.329	0
PLDM	1.269.248	1.269.248	0
PPM	1.500	1.500	0
PPDA	59.516	34.516	25.000
ALDE	137.617	137.617	0
PR	2.557.000	2.535.000	22.000
PPPDA	1.094.878	1.087.378	7.500
PPFD	102.000	102.000	0
PAS	9.467.210	8.966.920	500.290
PPVP	55.486	55.486	0
CC	222.800	222.800	0
PDMM	189.790	189.790	0
PACE	2.600	0	2.600
PONA	18.425	18.425	0
PS	509.150	509.150	0
PDCM	1.398.852	1.387.489	11.363
PŞ	3.733.592	3.252.347	549.932
FASM	11.163	0	11.163
CUB	883.402	883.402	0
MAN	2.974.948	2.907.132	67.816
PNM	61.963	61.963	0
LOC	244.550	244.550	0
MRM	475.438	455.700	19.738
BERC	375.243	216.447	158.796
IC GUȚAN Valentin	42.000	42.000	0
IC Burlea Ion	5.070	0	5.070
IC Sîrbu Sergiu	3.768	3.768	0
IC Cebotaru Sergiu	12.000	11.985	0
IC Slobozianu Roman	4.518	4.518	0
IC Costiuc Nina	18.000	18.000	0
IC Malu Vladimir	29.820	30.000	0
IC Jizdan Vadim	10.026	10.026	0
IC Rusu Tatiana	6.816	6.816	0
IC Cimpoeş Valentin	24.300	24.300	0
IC Dandiş Nicolae	11.875	11.875	0
IC Moruz Dmitri	8.360	8.360	0
IC Musteață Valeriu	2.233	2.233	0
IC Urechean Radu	500	500	0

Competitor Name	TOTAL EXPENSES	Financial Expenditures	Expenditures from In-Kind Donations
IC Nasulea Ion	0	0	0
IC Vdovicenco-Minciuna Snejana	2.984	2.984	0
IC Guzun Ion	5.515	5.515	0
IC Turcanu Ion	2.260	2.260	0
IC Bivol Cristina	4.700	4.700	0
IC Belciug Ivan	8.000	8.000	0
IC Tureac Alexandru	8.130	8.130	0
IC Zavrotchii Dmitrii	3.400	3.400	0
IC Buzu Nicolae	3.135	3.135	0
IC Marahovschi Victor	73.102	73.102	0
IC Nița Victor	4.035	4.035	0
IC Cuzuioac Ghenadie	22.850	22.850	0
IC Mursa Olga	365	365	0
IC Jardan Viorel	6.740	6.740	0
IC Damian Nicolae	8.026	8.026	0
IC Gaina Tamara	0	0	0
IC Vitalie Vrabie	303.139	303.139	0
IC Filimon Ion	3.500	3.500	0
IC Lipcan Pavel	5.000	5.000	0
IC Timofti Nicolae	3.005	3.005	0
IC Dudoglo Nicolai	89.300	89.300	0
IC Anastasov Serghei	60.720	60.720	0
IC Chiulafli Serghei	73.024	73.024	0
IC Levintii Dmitrii	0	0	0
IC Gheorghiu Veaceslav	2.495	2.495	0
IC Topal Anatoli	22.667	22.667	0
IC Carapirea Nicolai	0	0	0
IC Uzun Anatoli	28.140	28.140	0
IC Zlatovcen Ivan	5.957	5.957	0
IC Garizan Oleg	19.500	19.500	0
IC Fucedji Vadim	5.930	5.930	0
IC Chiosea Ilia	1.565	1.565	0
IC Chiciuc Piotr	100	100	0
IC Topciu Fiodor	1.026	1.026	0

Annex No. 9. Declared Expenditures by Electoral Competitors

Competitor Name	TOTAL EXPENSES	Financial Expenditures	Expenditures from In-Kind Donations
TOTAL	37.499.809	34.726.263	2.773.546
PSDE	1.419.015	1.129.452	289.563
PCRM	221.781	221.781	0
MPSN	25.500	25.500	0
PL	178.000	178.000	0
PSRM	5.937.326	5.001.190	936.136
PVE	18.900	18.900	0
PN	2.673.141	2.506.562	166.579
PPN	24.999	24.999	0
PNL	128.329	128.329	0
PLDM	1.269.248	1.269.248	0
PPM	1.500	1.500	0
PPDA	59.516	34.516	25.000
ALDE	137.617	137.617	0
PR	2.557.000	2.535.000	22.000
PPPDA	1.094.878	1.087.378	7.500
PPFD	102.000	102.000	0
PAS	9.467.210	8.966.920	500.290
PPVP	55.486	55.486	0
CC	222.800	222.800	0
PDMM	189.790	189.790	0
PACE	2.600	0	2.600
PONA	18.425	18.425	0
PS	509.150	509.150	0
PDCM	1.398.852	1.387.489	11.363
PŞ	3.733.592	3.252.347	549.932
FASM	11.163	0	11.163
CUB	883.402	883.402	0
MAN	2.974.948	2.907.132	67.816
PNM	61.963	61.963	0
LOC	244.550	244.550	0
MRM	475.438	455.700	19.738
BERC	375.243	216.447	158.796
IC GUȚAN Valentin	42.000	42.000	0
IC Burlea Ion	5.070	0	5.070
IC SIRBU Sergiu	3.768	3.768	0
IC Cebotaru Sergiu	12.000	11.985	0
IC Slobozianu Roman	4.518	4.518	0
IC Costiuc Nina	18.000	18.000	0
IC Malu Vladimir	29.820	30.000	0
IC Jizdan Vadim	10.026	10.026	0
IC Rusu Tatiana	6.816	6.816	0
IC Cimpoeş Valentin	24.300	24.300	0
IC Dandiş Nicolae	11.875	11.875	0
IC Moruz Dmitri	8.360	8.360	0
IC Musteață Valeriu	2.233	2.233	0
IC Urechean Radu	500	500	0
IC Nasulea Ion	0	0	0

Competitor Name	TOTAL EXPENSES	Financial Expenditures	Expenditures from In-Kind Donations
IC Vdovicenco-Minciuna Snejana	2.984	2.984	0
IC Guzun Ion	5.515	5.515	0
IC Țurcanu Ion	2.260	2.260	0
IC Bivol Cristina	4.700	4.700	0
IC Belciug Ivan	8.000	8.000	0
IC Tureac Alexandru	8.130	8.130	0
IC Zavroțchii Dmitrii	3.400	3.400	0
IC Buzu Nicolae	3.135	3.135	0
IC Marahovschi Victor	73.102	73.102	0
IC Nița Victor	4.035	4.035	0
IC Cuzuioc Ghenadie	22.850	22.850	0
IC Mursa Olga	365	365	0
IC Jardan Viorel	6.740	6.740	0
IC Damian Nicolae	8.026	8.026	0
IC Gaina Tamara	0	0	0
IC Vitalie Vrabie	303.139	303.139	0
IC Filimon Ion	3.500	3.500	0
IC Lipcan Pavel	5.000	5.000	0
IC Timofti Nicolae	3.005	3.005	0
IC Dudoglo Nicolai	89.300	89.300	0
IC Anastasov Serghei	60.720	60.720	0
IC Chiulafli Serghei	73.024	73.024	0
IC Levintii Dmitrii	0	0	0
IC Gheorghiu Veaceslav	2.495	2.495	0
IC Topal Anatoli	22.667	22.667	0
IC Carapirea Nicolai	0	0	0
IC Uzun Anatoli	28.140	28.140	0
IC Zlatovcen Ivan	5.957	5.957	0
IC Garizan Oleg	19.500	19.500	0
IC Fucedji Vadim	5.930	5.930	0
IC Chioseia Ilia	1.565	1.565	0
IC Chiciuc Piotr	100	100	0
IC Topciu Fiodor	1.026	1.026	0

Annex No. 10. Categories of Election Day Incidents Across the Last 3 National Elections

No.	Incident Category	2020 Presidential Election, Round II	2021 Early Parliamentary Elections	2023 General Local Elections
1.	Presence of advertising materials, posters, billboards within the radius of the polling station (100 meters from the polling station premises)?	9	57	17
2.	Restricting observer access or obstructing free observation in polling stations	13	12	13
3.	Issues with ballot box sealing: non-compliance, damage, or missing seals	43	19	25
4.	Unjustified presence of unauthorized individuals in or around polling station premises (within 100m radius).	28	24	86
5.	Violations of Ballot Secrecy (photographing of ballot papers, displaying the ballot paper with the vote cast, improper placement of polling booths allowing visibility of voter's choice, third parties marking the names/surnames of voters who voted, etc.)	108	100	150
6.	Ballots not distributed to PEB members are not stored securely in a safe/drawer within the polling station	0	4	6
7.	Rumors, attempts, or instances of offering material or monetary incentives to voters within 100 meters of the polling station to influence voting	22	17	7
8.	Electioneering or negative PR actions within 100m perimeter and/or polling station precinct to influence voter choice	19	29	23
9.	Organized transportation of voters (coaches, minibuses, or other vehicles not commonly found near polling stations)	37	29	16
10.	Interruption of the filming process during Election Day	24	53	83
11.	Acts of violence or intimidation towards voters or others	9	9	15
12.	Deficiencies in the functioning of the State Automated Information System "Elections" (SAISE) (disruptions; instances where SAISE indicates a voter has voted when they claim not to have)	61	28	58
13.	Inaccuracies in the electoral lists (address discrepancies; deceased voters; signatures on behalf of others)	15	23	93
14.	Unjustified group voting (2 or more people in voting booths) or repeated assistance by the same individual to voters unable to complete ballots on their own	10	31	133
15.	Unjustified interruption/suspension of voting at the polling station	7	12	3
16.	Refusal to release copies of all requested vote-counting protocols (records, minutes)	5	13	8
17.	Others	80	20	118
TOTAL		499	480	854

