

Promo-LEX

Advancing democracy and human rights

OBSERVATION MISSION

PRESIDENTIAL ELECTIONS AND
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The responsibility for the opinions expressed in this report lies with the Promo-LEX Association and does not necessarily reflect the positions of the donors. In case of discrepancies between the Romanian text and its translation into another language, the Romanian version of the report shall prevail. age and its translation in another language, the provisions in the Romanian version shall prevail.

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EXECUTIVE SUMMARY

Legal framework. Promo-LEX OM highlights the lack of a clear legal framework concerning the consolidation of elections, the unique aspects of running electoral campaigns for two simultaneous elections, and the participation of unregistered entities in the campaign for one of these elections. As a result, independent candidates in the presidential elections and initiative groups find themselves at a disadvantage, as the legislation does not provide them with the same rights as political parties or electoral blocs that are registered as competitors in both elections.

Furthermore, Promo-LEX OM states that while legal regulations have been established to penalize the involvement of religious denominations in the electoral campaign, instances of electoral agitation by their representatives have also been noted in this election.

Electoral bodies. During the reference period, the CEC met in 9 meetings and adopted 106 decisions. Over 1,000 individuals were confirmed as authorized participants in the electoral process. They included: 28 journalists, 527 international national observers, and 517 trusted persons.

For each of the 11 registered electoral competitors in the election race, one representative has been confirmed in the Central Electoral Commission (CEC). The 517 trusted persons have been confirmed on behalf of Renato Usatii and Vasile Tarlev. Promo-LEX OM draws the attention of electoral competitors to the importance of utilizing the institution of "representatives and trusted persons" during the electoral campaign.

Most of the lower electoral bodies visited by Promo-LEX observers (DEC II and PEB) were open during working hours. The electoral officials were responsive and cooperative. At the same time, Promo-LEX observers noted several cases of intimidation of electoral officials within DEC II.

The electoral bureaus were established within the legal deadline. The gender composition of the bureaus remains unbalanced, with 90% women and 10% men. As for the entities entitled to nominate members, 40% were appointed by local councils, 30% by parliamentary parties (PAS – 12%, PSRM – 11.3%, and PCRM – 6.5%), while the remaining 30% of positions were filled from the Register of Electoral Officials.

A problematic situation occurred during the organization of elections in the Russian Federation, due to the failure to establish three polling stations after the Ministry of Foreign Affairs withdrew the proposed candidates for these bureaus. Promo-LEX OM thus emphasizes that MFA and DEC no. 38 must adhere to legal requirements and CEC decisions to ensure timely organization of elections abroad.

Promo-LEX OM continued its observation of mail-in voting, focusing on the printing of ballots for 1,089 voters and the distribution of relevant electoral materials and documentation to the responsible precinct electoral bureaus (PEB).

Public administration. Promo-LEX has found that most of the visited 109 mayor's offices have implemented decisions to provide spaces for advertising and meetings with voters. In 71% of instances, these meeting spaces were offered at no cost. The authority to appoint members to the electoral body was exercised inconsistently: in at least 36 electoral bureaus, local councils did not appoint any members, while in 34 PEBs fewer than three members were appointed. Conversely, in 477 PEBs, local councils took advantage of their right to add 1 to 4 members to the bureau's composition.

Complaints and electoral disputes. During the reporting period, the Central Electoral Commission received 10 complaints regarding the use of administrative resources (4 cases), the establishment of polling stations (3 cases), electoral advertising (1 case), campaign activities (1 case), and the refusal to register a candidate (1 case). All deadlines for addressing these complaints were observed.

A total of eight actions were filed in court, addressing issues such as the exclusion of political parties from the list of eligible candidates, the establishment of polling stations, refusal to register individuals as trusted representatives, the annulment of regulations set by CEC, and the refusal to release subscription lists. These cases were adjudicated by the courts within a timeframe of 2 to 10 days, although the legal deadline was exceeded in two instances.

Registration of electoral competitors. For the presidential elections on 20 October 2024, the Central Electoral Commission (CEC) has registered 11 electoral competitors, of which 5 were nominated by political parties, 1 by an electoral bloc, and five were independent candidates (IC). One candidate, Igor Munteanu, was not registered, and a group of initiative failed to collect the required number of signatures (Alexandru Arseni). During verification of subscription lists, the most common reasons for invalidating supporters' signatures were: the supporter incorrectly filled in their identification details (37.9%) and the supporter provided incorrect identity information that made identification impossible (35.6%).

Compared to the presidential elections of 2020, when 8 candidates were registered, the number of competitors in this election has increased. Additionally, the proportion of women candidates has risen from 25% in 2020 to 36% in 2024. We also note an increase in the number of independent candidates, in contrast to the previous presidential election, where only one independent candidate was registered.

Registration of referendum participants. For the constitutional republican referendum, CEC has registered 15 participants, of which 13 chose "YES" option and two chose "NO" option. During the examination process, the Commission rejected 3 registration requests from referendum participants and recorded one case of revocation of a registration decision.

Activity of electoral competitors. In the first ten days of the campaign, Promo-LEX observed at least 792 promotional activities. Most of them were carried out by three competitors: Maia Sandu (PAS) – 286 (36%), Alexandr Stoianoglo (PSRM) – 217 (27%), Renato Usatii (OP) – 104 (13%). Note that in the case of PAS, most of the election campaign events had a dual purpose, promoting both Maia Sandu (PAS) and the constitutional referendum. There is also continued involvement of the unregistered political bloc "Victory" in activities promoting "NO" option for the referendum.

At least 1,711 instances of electoral advertising were reported. According to observers, the most active were the same three competitors: PAS and Maia Sandu (PAS) – 39%, followed by Alexandr Stoianoglo (PSRM) – 24%, and Renato Usatii (OP) – 16%.

Furthermore, there were at least three reported instances where members of a religious group participated in the election campaign of independent candidate Victoria Furtuna and in promoting a particular referendum option.

Use of administrative resources and activities with the potential to corrupt voters. Observers identified at least 32 cases classified as the use of administrative resources, of which 30 involved PAS and Maia Sandu (PAS), and one case each for RP/PB Victory and Ion Chicu (PDCM). These cases involved participation in electoral campaign activities by public officials (11 cases) and electioneering with the involvement of public sector employees during working hours (21 cases).

Furthermore, during the observation period, at least seven cases were noted that could be classified as voter corruption, mainly involving PB Victory.

Financing of the presidential election campaign. According to data published on the official CEC website, during the observation period, only five electoral competitors submitted financial reports for the week leading up to 23 September 2024. By the week ending on 30 September, all 11 registered candidates had submitted reports.

According to the reports submitted to CEC, the total income declared by presidential candidates for the period between 20 and 30 September was 12,997,847 lei, of which 236,399 lei came from material donations. The highest declared income was from Maia Sandu (PAS) – 36% of the total, followed by Alexandr Stoianoglo (PSRM) – 34%, and Renato Usatii (OP) – 19%.

In terms of expenditures, the total declared by the candidates was 8,384,579 lei, of which 236,399 lei came from material donations. The highest declared income was from Maia Sandu (PAS) – 50% of the total reported expenses, followed by Renato Usatii (OP) - 26% and Alexandr Stoianoglo (PSRM) – 14%.

According to Promo-LEX estimates, unreported expenses amounted to at least 2,281,950 lei. The highest unreported expenses were for Alexandr Stoianoglo (PSRM) – 40% of the total estimated expenses, followed by Vasile Tarlev (FMP) – 23%, and Irina Vlah (Independent Candidate) – 18% of the expenses.

Financing of the referendum campaign. In the context of the referendum, only PAS submitted financial reports detailing their campaign income and expenditures. Four participants (CUB, Together EB, PPDA, and PPN) reported no income or expenses related to the campaign. As of 30 September 2024, the remaining 10 participants had not provided any financial data on the CEC's official website concerning their campaign funding.

PAS reported a total income of 1,377,300 lei, with 10,000 lei coming from material donations. Their declared expenditures totalled 1,241,966 lei, the majority of which was spent on promotional materials (65%), followed by the production and broadcasting of advertisements (17%) and the organization of electoral events (11%).

For the campaign activities conducted by four referendum participants (RP/PB Victory, PCRM, PAS, and MAN), Promo-LEX estimated unreported expenses amounting to at least 1,642,552 lei.

Hate speech. Between 9 and 22 September, at least 14 cases of hate speech and other forms of intolerance were identified. Of these 14 cases, eight occurred in a political context, and six were in an electoral context. "Political affiliation," "professional activity," and "health" were the main criteria behind the hate speech cases identified during this period. The six cases were viewed over 134,000 times and shared 368 times.

INTRODUCTION

Report no. 3 is prepared and presented by the Promo-LEX Observation Mission (OM) for the presidential elections and the constitutional referendum of 20 October 2024. This report covers the findings from the electoral period between 18 September 2024 and 1 October 2024, which includes the period of candidate registration process for the presidential election and referendum, along with the start of the electoral campaign. The financing of initiative groups and electoral competitors was monitored between 20 and 30 September, while hate speech and incitement to discrimination were monitored between 9 and 22 September.

Public reports presented by Promo-LEX Observation Mission throughout its activities include findings, conclusions, and recommendations concerning both elections, the presidential elections and the constitutional referendum. Promo-LEX has planned to present four interim reports (five if a second round of elections is held) and a final report. On election day (including for a potential second round of presidential elections), press releases will be issued on the conduct of the election and the results of the rapid vote count.

The objectives of Promo-LEX reports are: to inform the public about trends observed in the electoral process; to notify electoral authorities of the real-time observations on the quality of the election organization and execution; to hold electoral actors accountable; to prevent potential violations of electoral legislation.

The observation methodology applied by Promo-LEX is based on international standards in the field and involves long-term (electoral period) and short-term (election day) observation. The observation reports are prepared by the central team of Promo-LEX Observation Mission, based on their own findings and those reported by long-term observers (LTOs) regarding the activities of all actors involved in organizing and conducting the elections: (potential) electoral competitors, referendum participants, public authorities, electoral bodies, political parties, and civil society. LTO findings are reported using thematic forms and stored on the web platform www.data.promolex.md, a secure system with limited access managed by Promo-LEX. Promo-LEX observers collect and analyze information from on-site visits, interviews, meetings with stakeholders, and consultations of official documents. The activities of electoral competitors and referendum participants are also monitored online.

Monitoring the financing of campaigns is an important component of Promo-LEX Observation Mission. This involves monitoring electoral competitors from the perspective of financial resources collected and used for campaign activities. Promo-LEX estimates the expenses incurred by electoral competitors using minimum market prices and compares them with those declared to the Central Electoral Commission (CEC) by competitors, in order to evaluate transparency and fairness of campaign financing. We acknowledge that there may be some discrepancies between the costs used by Promo-LEX for estimates and the actual costs of the electoral competitors, but it is important that these prices are applied uniformly for all competitors. Promo-LEX will also observe and analyse how CEC performs its role in overseeing and monitoring political financing.

The observation of electoral procedures is carried out during the electoral period by 45 LTOs, including two LTOs responsible for monitoring election campaigns and election day activities abroad. Promo-LEX monitors hate speech and incitement to discrimination by means of seven monitors.

On election day, Promo-LEX will ensure observation by covering polling stations with a representative sample of 600 short-term static observers (STOs). Their efforts will be complemented by 140 STOs, who will visit the remaining polling stations in 70 mobile teams, with two observers per team. Promo-LEX will observe every polling station established for voters from the Transnistrian region. Additionally, over 50 polling stations opened abroad will be covered by observers. Special

attention will be given to stations set up for postal voting, as well as those where voting will take place over two days.

The activity of observers is managed by the central team of the Mission. All Promo-LEX observers and monitors are trained during seminars organized by the Observation Mission. Furthermore, observers sign and commit to adhere to the Code of Conduct¹ for Promo-LEX independent national observers, and to act in good faith and in a non-partisan manner.

Promo-LEX Observation Mission (OM) for the presidential elections and the constitutional referendum of 20 October 2024 is a project carried out by Promo-LEX Association as part of the Civic Coalition for Free and Fair Elections (CALC).

Promo-LEX OM is not a political opponent of the competitors and participants involved in the electoral process, is not an investigative body and does not assume the express obligation to prove the observed findings. However, the observers' reports are accompanied, as far as possible, by photographic and video evidence, which can only be made available to the law enforcement bodies and Central Electoral Commission, on the basis of appropriate requests, and under no circumstances to the electoral competitors. At the same time, the violations, including the alleged ones, which are included in this report, must be treated by the electoral authorities as notifications and are to be examined according to their competence, in the light of provisions of Article 88, para. (9) of the Electoral Code.

Promo-LEX Mission manages the web platform www.electorala.monitor.md where anyone can report electoral campaigning activities. Relevant information from the observers' reports is stored on the same platform. Additionally, reports from citizens can be verified by the observers.

Promo-LEX is a public association, which aims to develop democracy in the Republic of Moldova, including the Transnistrian region, by promoting and protecting human rights, monitoring democratic processes and strengthening civil society. The Association has been organizing election observation missions in the Republic of Moldova since 2009, with the current mission being the 27th. The employees and members of the Association also have international experience, participating in the observation of elections within 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 each report, recommendations are formulated for public authorities, electoral bodies, electoral competitors, other stakeholders, aiming to ensure good organization and improvement of electoral process.

This report is developed with the financial support of the United States Agency for International Development (USAID), the European Union, the German Marshall Fund of the United States, the Government of the United Kingdom, the International Organization of La Francophonie, and the Soros Foundation Moldova.

The responsibility for the views expressed in this report belongs to Promo-LEX Association and does not necessarily reflect the opinion of donors. If there are any discrepancies between the text in Romanian language and its translation in another language, the provisions in the Romanian version shall prevail.

¹ [The Code of Conduct](#) for Promo-LEX independent national observers can be found here.

I. LEGAL FRAMEWORK

1.1. Uncertainties regarding electoral campaigns conducted by unregistered participants in the referendum

Under the current legislation, independent candidates or other non-political actors cannot register as participants in a referendum. According to the Electoral Code, only political parties or electoral blocs can be registered as referendum participants.

On the other hand, due to amendments to the Electoral Code at the beginning of 2024 [Article 184, para. (2)], the legislator decided that the presidential elections and the constitutional referendum would take place on the same day. However, Parliament has not yet regulated the specific details concerning the conduct of electoral campaigns for two parallel elections, nor has it addressed the involvement of subjects unregistered for one of the elections. Promo-LEX has previously expressed opposition to the combination of elections, both in 2018² and in the context of the 2024 amendments to the Electoral Code³.

While political parties and electoral blocs had the option to choose which election to participate in and campaign for, independent presidential candidates and the citizens' initiative groups they formed did not have the same option. This places them in an unequal position because the law does not grant them the same rights as political parties or electoral blocs registered for both elections (e.g., access to free airtime for both elections, higher total campaign financing limits, etc.).

It is worth noting that the Central Electoral Commission (CEC) registered five independent candidates for the presidency of the Republic of Moldova. Since they are running for a position that involves making decisions on national issues, they are also expected to take a stance on the constitutional referendum. Furthermore, according to CEC Decision No. 2660 of 31 July 2024⁴, the central electoral authority decided that media service providers have the right to discuss the referendum topic with all debate participants as part of the external policy responsibilities of the Republic of Moldova. However, this topic should not exceed one-third of the total time allocated for debate broadcasts.

Although freedom of expression is guaranteed to all citizens, including candidates for state office, Article 70(2) of the Electoral Code stipulates that the right to conduct electoral agitation can be subject to formalities, conditions, restrictions, or penalties provided by law. The conditions and restrictions for this activity are regulated by Article 70(3)–(13), most of which are applicable to registered electoral competitors in the respective election.

According to Article 50 (b) and (c) of the Electoral Code, the financing and material support of electoral campaigns must comply with the principles of equal opportunity in the electoral process and transparency of income and expenditures. Based on these principles, Promo-LEX believes that in the context of combined elections, unregistered subjects in a particular election can engage in campaign or promotional activities only to the extent that such activities do not involve financial expenditures.

² Promo-LEX [Analysis](#) on holding the republican referendum on the same day with the parliamentary elections (24 February 2018)

³ Promo-LEX [Opinion](#) on holding the republican referendum on the same day with the parliamentary or presidential elections (15 January 2024).

⁴ CEC [Decision](#) No. 2660 of 31 July 2024, on media coverage of the presidential election and constitutional referendum on 20 October 2024:

Therefore, we recommend that Parliament regulate the circumstances in which unregistered participants in the election can engage in electoral campaigning. Moreover, we consider it appropriate to amend the Electoral Code to include non-political actors in the list of subjects eligible to register as referendum participants.

1.2. Activity of religious denominations in electoral campaigns

During the reporting period, there were multiple instances of religious groups being involved in electoral campaigns within the public sphere (see compartment 5.5 *Involvement of religious denominations in electoral campaigns*).

As outlined in the Law on freedom of thought, conscience and religion⁵, religious groups and their members must refrain from publicly expressing their political preferences or endorsing any political party or socio-political organization. Similar restrictions are also established by the Electoral Code⁶, which specifies that electoral agitation actions, directly or indirectly targeting electoral competitors and referendum participants, must not use images representing religious groups or their components.

The legislator's reasoning behind prohibiting religious groups from participating in electoral campaigns also extends to the financing of such campaigns. The Electoral Code⁷ prohibits any form of financial or material support for electoral campaigns by religious organizations.

The Constitution of the Republic of Moldova further strengthens the separation between the state and religious organizations, as highlighted in Article 31(4), which states that religious groups are autonomous and separate from the state. The Constitutional Court of Moldova reinforced this principle in Decision No. 34 of 13.12.2016⁸, ruling that the involvement of representatives of the Moldovan Orthodox Church in the 2016 presidential elections was contrary to the Constitution. In this context, the Court reminded all actors that, as a secular state, Moldova has the authority, through the Ministry of Justice, pursuant to Law on freedom of thought, conscience and religion⁹, to suspend the activity of religious groups for up to one year or even to seek the termination of their activities for more severe violations.

Moreover, both in this decision and letter¹⁰ to the Parliament, the Court emphasized the need for Parliament to establish swift and effective sanctions, including criminal penalties, for any attempts by religious groups to interfere in electoral campaigns. The Contravention Code, in Article 52, already provides for fines in cases where religious groups or their representatives engage in electoral agitation, including within places of worship.

Thus, we recommend that religious group representatives refrain from engaging in any activities promoting or opposing electoral competitors or referendum options. Additionally, we recommend the Police to thoroughly investigate and penalize instances of involvement by religious denominations in electioneering activities.

⁵ Article 15 para. (2) of [Law](#) No. 125 of 11.05.2007 on freedom of thought, conscience and religion.

⁶ Article 70 para. (4) of the Electoral [Code](#):

⁷ Article 54 para. (5) letter 3) of the Electoral [Code](#).

⁸ Constitutional Court [Decision](#) No. 34 of 13.12.2016 on confirmation of election results and validation of the mandate of President of the Republic of Moldova:

⁹ Article 24 of [Law](#) No. 125 of 11.05.2007 on freedom of thought, conscience and religion.

¹⁰ [Letter](#) sent by the Constitutional Court to Parliament:

II. ELECTORAL BODIES AND PUBLIC ADMINISTRATION

2.1. Activity of the Central Electoral Commission

Approving decisions on the organization and conduct of elections. During the observation period, the CEC held 9 meetings and adopted 106 decisions.

Accreditation of observers. During the observation period, there was an increased interest from international observers in these elections. Accordingly, at their request, CEC accredited an additional 102 international observers and experts, as well as 425 national observers. No cases of rejection of applications submitted by applicants were noted.

In total, for monitoring the elections on 20 October 2024, the electoral authority accredited 1,246 observers from 32 national and foreign institutions: 1,068 national observers and 178 international observers and experts, including the international election observation missions ENEMO, OSCE/BIDDO, and NDI (see Annex 1). Out of the total number of national observers, 1,059 (99%) were accredited by Promo-LEX Association.

Conformation of representatives and authorized persons. According to Article 69 of the Electoral Code, electoral competitors are entitled to appoint one representative for the electoral period within the electoral bodies that registered them, as well as in subordinate electoral bodies. Once confirmed by the electoral body, the representatives can defend the interests of the electoral competitor in electoral disputes, as well as in court. Thus, the Commission confirmed one representative for each electoral competitor (11) in CEC for the electoral period of the presidential elections on 20 October 2024.

By CEC Decision No. 2874 of 16 September 2024¹¹, the electoral authority established a maximum number of 2,143 authorized persons¹² who can be confirmed for each electoral competitor and participant in the constitutional republican referendum, distributed across each electoral constituency. They can assist in conducting electoral campaigns, engage in electoral agitation, and represent their interests in dealings with public authorities, voters, and electoral councils and bureaus.

By 1 October, only two electoral competitors exercised this right. Thus, CEC confirmed a total of 517 authorized persons: 262 from Renato Usatii and 255 from Vasile Tarlev.

Concerning the trusted persons submitted for confirmation by Vasile Tarlev, it is noted that CEC rejected the candidacy of Alexandr Isac, mayor of Chistelnita, Telenesti, elected from the RP. According to CEC decision, the request for confirmation of Mr. Alexandr Isac implies the existence of a camouflaged electoral bloc, which contradicts Article 1 of the Electoral Code.¹³

¹¹ CEC [Decision](#) No. 2874 of 16 September 2024

¹² According to Article 71 of the Electoral Code, electoral competitors can have authorized persons with voting rights in each electoral constituency. Authorized persons can assist electoral competitors in conducting electoral campaigns, engage in electoral agitation, and represent their interests in dealings with public authorities, voters, and electoral councils and bureaus.

¹³ The notion of an electoral bloc signifies "a voluntary union of two or more political parties, established for the purpose of participating jointly in elections and registered by the Central Electoral Commission."

Additionally, we draw attention to another case¹⁴ in which CEC decided to exclude Mr. Alexandr Berlinschi, former CEC secretary, from the list of trusted persons. The reason for his exclusion, as explained during the meeting, was a potential conflict of interest. This was based on Article 20 of the Law on declaration of wealth and personal interests¹⁵, which states that individuals who have ended their employment or service with a public organization cannot, for one year, represent the interests of any person or legal entity in that organization, nor can they represent them in matters related to their previous duties.

Given that the former CEC secretary's service ended on 5 April 2024¹⁶, and taking a strict interpretation of the Electoral Code, it can be concluded that he falls under the prohibitions outlined in Article 20 of Law No. 133/2016. This is because less than a year has passed between his resignation and the decision to appoint him as a trusted person for Renato Usatii.

Nevertheless, note that both the representative and the trusted person represent the electoral competitor. Representation is ensured in various areas of activity; thus, the trusted person cannot hold the status of a representative and vice versa, as this incompatibility is provided for in their operational regulations.

Given the above, Promo-LEX OM draws the attention of electoral competitors to the importance of using the institution of "representatives and trusted persons" during the electoral campaign.

Confirmation of journalists. During the observed period, CEC confirmed 28 additional journalists for the purpose of covering and monitoring the elections. In total, the electoral authority confirmed 37 journalists from six media outlets/institutions in the country (see Annex 1).

In accordance with the provisions of the Regulation on coverage of elections by media institutions, the coverage of the electoral process can also be carried out by journalists accredited by international or foreign media institutions. According to point 13 of the aforementioned document, these journalists, as well as their interpreters, need to be confirmed by the Ministry of Foreign Affairs, and the right to invoke Article 89(6) of the Electoral Code will be confirmed by CEC. The accreditation¹⁷ (confirmation) procedure and the necessary documents are available on the Ministry's website.

Promo-LEX observers identified a case where MFA refused¹⁸ to confirm a correspondent from the RIA Novosti news agency, based on a negative opinion from the Intelligence and Security Service.

Approval of public interest messages. In the observed timeframe, CEC approved 12 additional public interest messages (nine video spots, one leaflet, one informational material, and one brochure), developed by the Commission (6), Promo-LEX Association (2¹⁹), "Citizens for Europe" Association (1), and the National Agency for the Development of Youth Programmes and Activities (3) (see Annex 1).

¹⁴ CEC [Decision](#) No. 2947 of 24 September 2024, regarding the registration of trusted persons from Renato Usatii, candidate for president of the Republic of Moldova on 20 October 2024.

¹⁵ [Law](#) No. 133/2016 on declaration of wealth and personal interests.

¹⁶ Parliament [Decision](#) No. 088 of 5 April 2024, regarding the termination of CEC membership.

Accreditation ¹⁷ [procedure](#) of MFA

¹⁸ [Refusal](#) of accreditation of a journalist from a foreign media outlet.

¹⁹Promo-LEX spot: [Future does not accept excuses. Future demands responsibility.](#)

Authorization to conduct opinion polls and exit polls. During the reference period, CEC authorized the conduct of four opinion polls regarding voters' political preferences by three institutions: MLD MEDIA S.R.L. (2), SIMPALS S.R.L. Institute of Public Policy (IPP) (1).

Public information. Promo-LEX MO emphasizes that, during this period as well, there were periodic difficulties in accessing electoral materials published under the "Incoming/Outgoing Documents" section on the Commission's website. We reiterate our belief that ensuring transparency throughout the entire process is very important, and the electoral authority should ensure correct, complete, and timely information for the general public and all stakeholders in the electoral process.

2.2. Work of second-level district electoral councils

Compliance with the work schedule. According to Promo-LEX observers, in 97% of the 74 visits, the second-level district councils (DEC II) were open during working hours²⁰.

Changes in the composition of DEC. In the observed period, Promo-LEX MO identified three cases of changes in the composition of the second-level DEC (No. 23 Nisporeni, No. 36 UTAG, and No. 37 for localities on the left bank of the Dniester). These changes were caused by the resignation requests of DEC members included in the composition of the councils in the Register of Electoral Officials.

Accreditation of observers. Based on the observations, at the territorial level, only three observers from "Bastina - Nimoreni" Civic Association (Ialoveni) were accredited, specifically within DEC II.

Difficulties in the activities of electoral bodies. During the visits, Promo-LEX observers interacted with electoral officials, who were open, cooperative, and responsive to requests for presenting electoral materials. From the discussions, it was noted that the main difficulty encountered in their activity was related to confirming the composition of electoral bureaus.

Additionally, there was an incident of intimidation involving the leadership of DEC II no. 8 Cantemir regarding the confirmation of the nominal composition of PEB Sadic no. 8/39 (see section on complaints submitted to CEC). The leadership of DEC II no. 8 faced intimidation from the local councillor Avram Ion (member of PEB no. 8/39) and a resident of the same area because they allegedly overlooked a decision made by the Local Council²¹ during the formation of PEB Sadic. Consequently, PEB was established with seven members from the Register of Electoral Officials and two members appointed by two political parties (PAS and PSRM). This intimidation manifested through heated debates between the president and the councillor/PEB member, which were recorded on video and subsequently shared on social media.

In another case, Vasile Bolea filed a complaint with the General Prosecutor's Office, requesting the initiation of criminal proceedings against two presidents of district electoral councils and several police officers for collecting information about the complainant, exceeding their official duties, and negligence in office.

We condemn the intimidation of electoral officials, considering such actions inadmissible and dangerous for the proper functioning of the electoral bodies.

²⁰In one of the two visits, the DEC No. 13 Donduseni was closed during working hours.

²¹ According to letter no. 7 of 27.09.2024 of Cahul Territorial Office of the State Chancellery, the administrative act (Sadîc Local Council decision regarding the nomination of candidates for the establishment of PEB) is not published in the State Register of Local Acts.

2.2.1. Organizing elections for citizens abroad.

Establishment of precinct electoral bureaus in the Russian Federation. A problematic situation arose during the monitored period regarding the organization of elections in the Russian Federation.

Note that, by CEC decision no. 2866 of 14 September 2024, 234 polling stations were organized abroad for the elections on 20 October 2024. Through the same decision, the Commission ordered that DEC no. 38 establish the polling stations and the electoral bureaus. In accordance with this decision, on 14 September DEC no. 38 approved decision no. 8 regarding the establishment of 234 polling stations²². However, on 25 September 2024, DEC no. 38, contrary to CEC decision no. 2866, decided to establish only two electoral bureaus in the Russian Federation instead of five. The electoral council justified this decision by a request from the Ministry of Foreign Affairs (MFA), which withdrew the proposed candidates for the establishment of three PEBs (no. 196, 197, and 198)²³, citing the inability to ensure security conditions²⁴. Note that CEC stated that MFA only informed DEC about the withdrawal of its proposals, avoiding communication with the Central Electoral Commission.²⁵

CEC reviewed the subject in its session held on 29 September 2024, and addressed it within the context of adopting the decision regarding the complaint no. CEC-10APr/5 of 27 September 2024, by PSRM (*see section 3.1. Complaints submitted to CEC*). According to the Commission's decision, MFA was required to propose members for the three PEBs within two days, and DEC no. 38 was ordered to revise its decision within three days and establish five PEBs in the Russian Federation.

In Promo-LEX MO's view, this unusual situation is primarily about respecting the legislation and the roles assigned to public authorities in organizing the vote abroad. Promo-LEX Association has always advocated for a single coordinating authority with decision-making power, and this should be CEC²⁶.

We remind that, since 2020, CEC is the sole institution that decides on the number of polling stations established, in communication with MFA. Therefore, Article 39, paragraph (4) of the Electoral Code stipulates that: "The establishment of polling stations provided for in paragraphs (1) and (3) is decided by the Central Electoral Commission, with the prior approval of the Ministry of Foreign Affairs and European Integration regarding the fulfilment of the condition to obtain the consent of competent authorities of the respective country and the possibility of ensuring the voting process from a technical and logistical point of view."

In retrospect, note that there have been other situations where MFA's proposals did not entirely coincide with CEC's decision, but MFA complied with the electoral authority's decision without

²² [Decision no. 8](#) of 14 September 2024, regarding the establishment of polling stations abroad and for mail-in voting for the constitutional referendum and the election for the position of President of the Republic of Moldova on 20 October, issued by DEC no. 38.

²³ According to Article 39, paragraph (6) of the Electoral Code: "Members of the precinct electoral bureau abroad are proposed by the entitled subjects as follows:

a) 2 members are proposed by the Ministry of Foreign Affairs and European Integration. These members automatically serve as president and secretary of the respective electoral bureau;

b) 1 member is proposed by each political party represented in Parliament.

²⁴ [Decision](#) no. 9 of 25 September 2024, regarding the establishment of Precinct Electoral Bureaus Abroad, issued by DEC no. 38.

²⁵ [CEC decision no. 2977](#) of 29 September 2024, regarding the complaint (preliminary request) no. CEC-10APr/5 of 27 September 2024, of the Political Party "Socialist Party of the Republic of Moldova".

²⁶ [Promo-LEX analysis](#) on the geography and number of polling stations established abroad. Published on 16 October 2018.

delaying or jeopardizing the process. For example, in 2020, for Greece and Spain, MFA proposed opening one and four polling stations, respectively, but CEC decided on two and five, respectively.²⁷ Another example is the 2021 early parliamentary elections when MFA proposed the establishment of 191 polling stations, but CEC ultimately approved 150 without further consultation with the ministry.

In this context, we would like to draw attention once again to the necessity of ensuring effective collaboration among central public authorities that are pursuing a common goal²⁸, and to avoid jeopardizing the quality and legality of the decision-making process as well as the electoral process as a whole.

Given these events, *Promo-LEX OM thus emphasizes that MFA and DEC no. 38 must adhere to legal requirements and CEC decisions to ensure timely organization of elections abroad.*

Implementation of the postal voting. During the reference period of this Report, Promo-LEX OM continued its observation of postal voting organization activities. On 26 September 2024, Promo-LEX observers monitored the printing process of ballots intended for the partial implementation of postal voting in six countries (USA, Canada, Norway, Sweden, Iceland, and Finland).

A total of 1,809 ballots were printed for the elections on 20 October 2024, for voters who were accepted after verifying the applications submitted for postal voting. The ballots will be distributed as follows: 313 for Sweden, Norway, Iceland, and Finland; 508 for Canada; and 988 for the USA. Note that there were a total of 1,986 registrations, which means that only 9% of the applications did not pass the verification stage.

Additionally, the ballots, along with other relevant electoral materials and documentation, were sent to PEBs in the aforementioned states. In turn, the bureaus received the materials and began the process of distributing the envelopes with the voting materials. Promo-LEX intends to observe the reception of envelopes containing ballots by the electoral authority, as well as the procedures for counting and tabulating the votes in at least two polling stations.

2.2.2. Organization of elections for voters on the left bank of the Dniester

During the reporting period, DEC no. 37 constituted and managed the activity of PEB in accordance with the provisions of the regulatory framework and the calendar program. At the same time, Promo-LEX notes, based on publicly available information, that the Reintegration Policies Bureau, together with DEC, has not yet organized and conducted an information and electoral education campaign for voters on the left bank of the Dniester, even though Article 28 of the Electoral Code provides so.

The campaign “20 October is about our common future,” initiated by the media platform *Zona de securitate* is among the few informational actions directed towards voters on the left bank of the Dniester.²⁹

²⁷ [Report no. 3](#). Presidential election observation mission in the Republic of Moldova on 1 November 2020, p. 22.

²⁸Regarding the collaboration/cooperation between CEC and MAEIE, as well as other aspects relevant to the current situation, the Chisinau Court of Appeal also addressed this matter in 2021, a decision that was upheld by the Supreme Court of Justice: [Decision](#) of 17 June 2021, Chisinau Court of Appeal, Civil and Administrative Litigation College.

²⁹ “20 октября - это про наше общее будущее”. Что значит 20 октября для Приднестровья — как и где жителям региона голосовать на референдуме.

The unconstitutional authorities in Transnistria do not inform voters in the region about the elections on 20 October 2024, through their media channels.

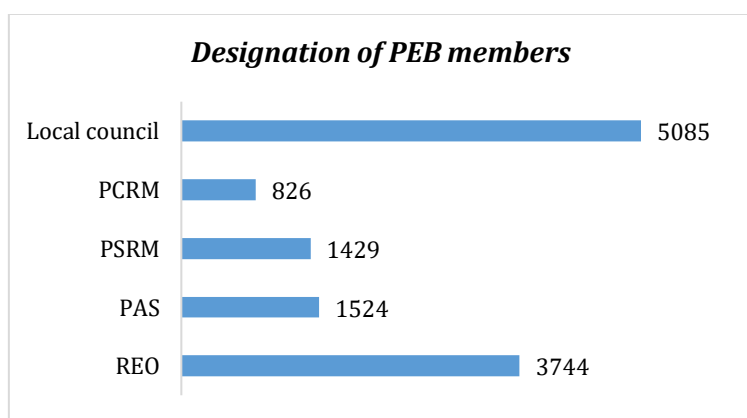
2.3. Activity of precinct electoral bureaus

Confirmation and modification of the composition of precinct electoral (PEBs). Within the timeframe specified in the calendar program (by 25 September), the district electoral councils constituted and confirmed the nominal composition of the electoral bureaus. According to Article 38, paragraph (9) of the Electoral Code, PEB consists of an odd number of members, at least 5 and no more than 11. Analysing the decisions of DEC regarding the formation and modification of the nominal composition of 1,533 PEBs³⁰ (69% of 2,222), we conclude the following:

- In the case of 113 PEBs (7.4% of the 1,533), the numeric composition was set at five members; in 611 PEBs (40%) — at seven members; in 564 PEBs (37%) — at nine members; and in 245 PEBs (16%) — at eleven members.
- Gender equality is not ensured in the composition of the electoral bodies, with the proportion of female members in PEBs being significantly higher than that of males (90% versus 10%). Moreover, in 691 electoral bureaus (45% of 1,533), no men are active, and in 754 (49% of 1,533), the number of men in PEBs composition is 1-2.
- The designation of members in the electoral body by the entities holding this right (local councils and parliamentary parties) was carried out differentially (see Graph no. 1 and Table no. 1). Thus, 40% of electoral officials were appointed by local councils, 30% by parliamentary parties (PAS – 12%, PSRM – 11.3%, and PCRM – 6.5%), while the remaining 30% of positions were filled from the Register of Electoral Officials.
- In at least 129 cases, the nominal composition of PEB was modified. The changes were due to resignation requests from members designated by local public authorities (18), PSRM (23), PCRM (11), PAS (16), and from the composition of REO (59).

Graph no. 1.

Table no. 1.



No. of members designated	LC	PAS	PSRM	PCRM
0 members	36	9	104	707
≤2 members	34	-	-	-

Between 30 September 2024 and 1 October 2024³¹, Promo-LEX observed at least 189 promotional activities. As a result of processing the reported information, we note the following:

³⁰ The number of DEC decisions regarding the confirmation of the nominal composition of PEB processed by Promo-LEX during 25 September – 1 October 2024.

³¹ After the election of the leadership, the public announcement of the composition, location of electoral

- The activity program of PEBs was respected at a rate of 94%.
- In at least nine cases, PEBs did not have an appropriately arranged space to carry out their activities.
- Only 54% of the PEBs made their composition public, and 83% published their working hours, thus not fully ensuring compliance with the legal obligation to inform the public about the activities of bureaus.
- Leadership positions are predominantly held by women (91% of the 189 visited). Gender balance in the leadership of the electoral body was observed in only 20 electoral bureaus (11% of the 189 visited).
- In at least five cases, the procedure for open voting during the election of the leadership was not followed.
- Only 30% of the visited electoral bureaus are accessible to vulnerable groups, 34%– are partially accessible, and 36%– inaccessible. Thus, we would like to remind that starting with 1 October 2024, individuals authorized to participate in the electoral process, including voters, can verify the accuracy of the data included in the voter's lists available at PEB, and the accessibility of bureaus is essential for citizens to exercise this right. We believe that state institutions must ensure normal social integration conditions for people with special needs, including participation in the electoral process at all levels.

2.4. Activity of public administration

Between 30 September 2024 and 1 October 2024, Promo-LEX observed at least 109 promotional activities. As a result of these visits, the following aspects were noted:

Adoption of the decision regarding the provision of advertising spaces. 107 mayors' offices (98% of the 109 visited) adopted the decision regarding the provision of advertising spaces. Of these, only 70 decisions (65%) were posted at the LPA headquarters. At the same time, clean advertising areas were arranged in only 86 ATUs (79% of the 109 visited)

Adoption of the decision regarding the provision of spaces for meetings with voters. Of the 109 visited localities, 103 mayors' offices (94%) adopted decisions regarding the provision of spaces for meetings with voters. Of these, only 67 decisions (65%) are posted at the LPA headquarters. Of the 103 LPAs that adopted decisions, 73 (71%) offer the space for meetings with voters for free, while 30 LPAs (29%) have established fees ranging from 1.63 lei to 500 lei per hour, and 1,000 lei to 2,000 lei per meeting. Among the offered spaces, we mention: cultural houses, festivity halls, educational institutions, parks and squares, stadiums, libraries, and meeting rooms of the mayors' offices.

Responsibilities of LPAs in designating members of the electoral body. Following the analysis of DEC decisions regarding the nominal confirmation of 1,533 PEBs, we find that, in the case of 36 electoral bureaus, the local council did not designate any member, and for 34 PEBs, the number of designated members was less than 3. Additionally, we note that in 477 PEBs, the local council exercised its right to complete the composition of the electoral bureau under Article 38, paragraph (11) of the Electoral Code³².

Responsibilities of LPA in declaring voters' residency. During the observation period, cases of improper application by representatives of local public administration of CEC Regulation regarding

bureaus, and contact details was made.

³² In cases where political parties do not submit their candidates for the precinct electoral bureau at least 5 days before the deadline of its establishment, the necessary number of members is completed by the local council.

the preparation, administration, dissemination, and updating of voters' lists were reported³³. Thus, individuals who showed up at the single window of certain district offices within Chisinau municipality to declare a new residency in order to be registered in the voters' list at the polling station corresponding to their residence were asked to return the next day to receive a receipt confirming the declaration of their new residence.

Promo-LEX recommends that CEC digitalize the procedure for declaring a new place of residence so that voters can personally update their information regarding their temporary residence.

³³ CEC [Regulation](#) on the preparation, administration, dissemination, and updating of voters' lists, approved by Central Electoral Commission Decision No. 1153 of 04.08.2023.

III. COMPLAINTS AND ELECTORAL DISPUTES

3.1. *Complaints submitted at CEC*

During the observation period, **10 complaints** were submitted at CEC. They covered the use of administrative resources (4 cases), the establishment of polling stations (3 cases), electoral advertising (1 case), campaign activities (1 case), and the refusal to register a candidate (1 case).

1. On 20 September 2024, the Central Electoral Authority registered Renato Usatii's complaint³⁴ number CEC-7/16482. The complaint states that Maia Sandu donated the "Robert Blum Prize for Democracy 2024," valued at 25,000 euros, for the repair and conservation of a church in the village of Niscani, Calarasi district. Thus, in the view of the complainant, Niscani village mayor's office, by posting about this on its Facebook page, allowed the use of administrative resources.

CEC examined the complaint within four days and declared it inadmissible³⁵, justifying its decision by stating that the complainant failed to submit evidence to support the claims, and also failed to meet the deadlines for filing the complaint.

Additionally, it is noteworthy that the complainant, in requesting the establishment of the use of administrative resources by Niscani village mayor's office, also sought an examination of the donation process as well as the legality of the donation made to the church in Niscani by electoral competitor Maia Sandu. However, since CEC deemed the complaint inadmissible, it did not verify this claim.

2. On 24 September 2024, a voter (Vasile Bolea) submitted a complaint to CEC requesting the establishment of the use of administrative resources by candidate Maia Sandu. He cites that videos have appeared in the public space, in which the presidential candidate, Maia Sandu, who is also the acting President, discusses actions taken in rural communities through the "European Village" project. These videos were published on Facebook and YouTube pages of the Presidency.

CEC examined the complaint within two days and issued Response No. CEC-8/6057 on 26 September 2024, stating that Vasile Bolea is not entitled to file a complaint since he did not invoke a violated right.

3. On 25 September 2024, Vasile Bolea submitted another complaint to CEC, requesting the establishment of the use of administrative resources by the Minister of Agriculture and Food Industry, Vladimir Bolea. According to the complaint, during an online meeting on 31 July 2024, with the heads of district agricultural departments, Vladimir Bolea urged them to inform farmers to participate in the elections and vote in the referendum for Moldova's accession to the European Union on 20 October 2024, noting that his speech represents a political statement.

Note that ministers fall under the prohibition of illicit use of administrative resources, as they are state officials. In this context, it should be clarified that in addition to the provisions of the Electoral Code prohibiting the illicit use of administrative resources (Articles 1 and 16), the Law on the status of people holding positions of public dignity No. 199/2010³⁶ states in Article 10 that an official, when exercising his/her functional duties, must refrain from promoting the doctrine and ideology of the

³⁴ The [complaint](#) filed by Renato Usatii.

³⁵ CEC [Decision](#) No. 2946 of 24 September 2024, regarding complaint No. CEC-7/16482 of 20 September 2024.

³⁶ [Law](#) No. 199/2010 on the status of people holding positions of public dignity;

party or socio-political organization of which he/she is a member or exponent, including from participating in fundraising or using administrative resources.

CEC examined the complaint in one day and issued Response No. CEC-8/6056 on 26 September 2024. As in the case of complaint no. 3, CEC noted that the complainant did not invoke the violation of a specific subjective right.

4. On 25 September 2024, Ion Chicu submitted a complaint³⁷ to CEC, registered under No. CEC-10Apr/1. The complainant alleges violations committed by Maia Sandu involving minors in the electoral campaign. He specifies that minor representatives of the youth organization of PAS distributed newspapers and leaflets as electoral agitation materials targeting the electoral candidate Maia Sandu. CEC examined the complaint³⁸ within two days and forwarded it to GPI for resolution according to its jurisdiction.³⁹

5. On 26 September 2024, Ion Duca, secretary of the local council of Sadic commune, submitted a preliminary request to CEC, under No. CEC-10Apr/2⁴⁰, requesting CEC to oblige DEC no. 8 Cantemir to amend its decision regarding the inclusion of a person as a member of this PEB no. 8/39 Sadic, etc. On the same day, Ion Avram, a local councillor from Sadic commune, and Maria Parsova, the person designated by the local council of Sadic commune to be a member of PEB no. 8/39, submitted a preliminary request with the same content, registered under No. CEC-10Apr/3⁴¹.

CEC decided to join these requests and examined them at the meeting on 29 September 2024, pronouncing it inadmissible⁴². CEC justified its decision by stating that the authors of the requests did not demonstrate the violation of their rights and do not have the authority to submit complaints on behalf of or on their own initiative regarding the actions of other public entities (in the case of Ion Duca).

6. On 26 September 2024, Vasile Bolea submitted a complaint to CEC against the NGO "Citizens for Europe," which allegedly conducted electoral campaigning in support of the constitutional referendum scheduled for 20 October 2024. This campaigning was carried out via a digital portal, Facebook page, and through meetings in various localities across the country.

The complainant requested that CEC determine the violation of the law, citing that, according to electoral campaign regulations, non-commercial organizations cannot engage in campaigning⁴³

CEC reviewed the complaint in five days and issued the Response No. CEC-8/6096 on 1 October 2024, referring the matter to the General Police Inspectorate (GPI) for further investigation in accordance with Article 52, paragraph (2) of the Contravention Code, which prohibits electoral campaigning by non-commercial organizations during an electoral campaign.

³⁷ [Complaint](#) submitted to CEC by Ion Chicu vs. Maia Sandu

³⁸ CEC's [Response](#) to the complaint submitted by Ion Chicu

³⁹ CEC based its position on the provisions of Article 50, paragraph (2), and 400 of the [Contravention Code](#) and Article 10, paragraph (3), letter n) of [Law](#) No. 62/2022 on advertising

⁴⁰ [Complaint](#) submitted by Ion Duca vs. DEC no. 8 Cantemir

⁴¹ [Complaint](#) submitted by Ion Avram and Maria Parsova vs. DEC no. 8 Cantemir

⁴² CEC [Decision](#) no. 2978 of 29 September 2024, regarding the complaints (preliminary requests) no. CEC-10Apr/2 and CEC-10Apr/3 of 26 September 2024, submitted by Mr. Duca Ion, Mr. Avram Ion, and Mrs. Parsova Maria.

⁴³ Article 6, paragraph (5) of [Law](#) No. 86/2020 on Non-Commercial Organizations

7. On 27 September 2024, Vasile Bolea filed another complaint with CEC, this time requesting that the electoral authority recognize the misuse of administrative resources by Maia Sandu during her campaign launch.

He pointed out that, along with ordinary citizens, high-ranking officials, including Parliament Speaker Igor Grosu and Prime Minister Dorin Recean, were present at the campaign launch event on 20 September 2024. Ministers, MPs, mayors, teachers, and cultural figures also attended the event. The complainant specified that these officials participated during working hours, for which they are paid from the state budget.

CEC reviewed the complaint in four days and issued the Response No. CEC-8/6097 on 1 October 2024. The response only reiterated legal provisions and did not include a concrete solution to the complaint.

8. On 27 September 2024, Igor Munteanu submitted a preliminary request, registered as No. CEC-10Apr/4, expressing his disagreement with the refusal to register him as a candidate for the Presidential election⁴⁴. CEC resolved the preliminary request on the same day⁴⁵. It informed Mr. Munteanu that according to the Electoral Code, CEC decisions must be challenged directly in court without requiring a preliminary procedure.

9. On 27 September 2024, PSRM submitted a preliminary request, registered as No. CEC-10Apr/5, contesting Decision No. 9⁴⁶, adopted by DEC no. 38 on 25 September 2024. The decision concerns the exclusion of three polling stations in the Russian Federation (Nos. 38/196, 38/197, and 38/198) out of the five⁴⁷ previously approved by CEC.

The authors of the notification mention that CEC Decision No. 2866 of 14 September 2024, has a binding nature, given that it has already been subjected to judicial review. It is worth noting that PSRM itself contested this CEC decision in the Chisinau Court of Appeals on 17 September 2024.

CEC examined this complaint within two days, and on 29 September 2024, it decided to partially admit it⁴⁸, instructing the Ministry of Foreign Affairs (MFA) to take actions within two days to put forward proposals for the establishment of precinct electoral bureaus that had been excluded. Additionally, CEC ordered DEC no. 38 to undertake actions to establish the three electoral bureaus within three days. MFA.

CEC based its decision on the fact that the Ministry of Foreign Affairs did not fulfil its legal obligations in the electoral process, as it withdrew its candidacy proposals without providing appropriate justification and failed to inform the Central Electoral Commission of this.

During the observation period, CEC addressed the complaints within a timeframe of 1 to 5 days, which was an improvement compared to the previous reporting period, even though a higher number of complaints were registered during this time.

⁴⁴ CEC [Decision](#) No. 2942 of 24 September 2024, regarding Igor Munteanu's registration as a candidate for President of the Republic of Moldova, representing the Coalition for Unity and Welfare Political Party, also included confirmation of the electoral competitor's representative and the financial officer (treasurer).

⁴⁵ CEC [Response](#) sent to Igor Munteanu

⁴⁶ [Decision](#) No. 9, adopted by DEC no. 38 on 25 September 2024

⁴⁷ CEC [Decision](#) No. 2866 of 14 September 2024

⁴⁸ CEC [Decision](#) no. 2977 of 29 September 2024, regarding the complaint (preliminary request) no. CEC-10Apr/5 of 27 September 2024, of the Political Party "Socialist Party of the Republic of Moldova";

Promo-LEX OM welcomes CEC's decision to publish complaints and the adopted solutions in the section dedicated to the "2024 Presidential Elections" on the CEC website. However, we regret to note that during this reporting period, some complaints were still not published on the Commission's website. Additionally, we observe that CEC continues not to inform the authors of complaints about the appeal, contrary to Article 120 para. (1) letter h) of the Administrative Code.

3.2. Complaints submitted at DEC

According to Promo-LEX observers, on 24.09.2024, DEC no. 31 Soldanesti was notified by the Soldanesti Police Inspectorate. The police informed DEC about the placement in the town of Soldanesti of a political content billboard belonging to "Our Party," contrary to the Law on Advertising.

Examining this complaint, DEC no. 31 Soldanesti decided to forward the complaint to the Police, as under the Contravention Code, this type of violation is ascertained and examined by the police.

3.3. Electoral litigation.

During the observation period, a total of **eight actions** were filed in court, addressing issues such as the exclusion of political parties from the list of eligible candidates, the establishment of polling stations, refusal to register individuals as trusted representatives, the annulment of regulations set by CEC, and the refusal to release subscription lists.

1. On 17.09.2024, the "Chance" Party filed an action with Chisinau Court of Appeal against CEC, requesting the exclusion of the respective formation from the list of political parties entitled to participate in the 20 October 2024 elections.

Chisinau Court of Appeal examined the action in two days and on 19.09.2024 rejected it as unfounded⁴⁹.

The court stated that it "cannot uphold as justified the argument of the "Chance" Political Party that the provisions of Article 21 para. (8) of the Law on Political Parties, according to which the activity of the political party cannot be limited during the electoral campaign in which it participates, are applicable to this case. Thus, the activity of a political party cannot be limited only during the electoral campaign in which it participates, which, according to the definitions in Article 1 and Article 70, paragraph (3) of Electoral Code No. 325/2022, begins on the date of registration of the electoral competitor, but not earlier than 30 days before the election day. The election day was set for 20 October, and the limitation regarding "Chance" Political Party was applied outside the electoral campaign, the contested decision being issued on 14 September 2024.

On 19.09.2024, Chance Political Party filed an appeal against the decision of the appellate court. The Supreme Court of Justice examined the appeal in six days, declaring it inadmissible on 25.09.2024.⁵⁰

2. On 17.09.2024, PSRM filed an action expressing its disagreement with CEC's position on organizing polling stations abroad⁵¹, particularly disagreeing with the number of polling stations proposed for the Russian Federation.

⁴⁹ [Decision](#) of Chisinau Court of Appeal on 19.09.2024 in the case Chance Party vs. CEC

⁵⁰ [Ruling](#) of the Supreme Court of Justice of 25.09.2024 in the case of the Chance Party vs. CEC

⁵¹ CEC [Decision](#) No. 2866 of 14.09.2024 regarding the organization of polling stations abroad and for postal voting for the constitutional republican referendum and the presidential elections of the Republic of Moldova

Chisinau Court of Appeal examined the action in three days and on 20.09.2024 issued a decision⁵² rejecting some of the claims made by PSRM as unfounded, and declaring the others inadmissible. Regarding the complaint related to the number of polling stations proposed for the Russian Federation, the court referred to the legality of CEC decision, taking into account the opinion of the Ministry of Foreign Affairs and the response from the Information and Security Service.

In addition, the court declared inadmissible the action obliging the electoral authority to issue a favourable administrative act, citing that "prior to filing the administrative court complaint, PSRM did not comply with the provisions of Article 208 para. (3) of the Administrative Code, and did not previously submit a request to the competent public authority."

We remind that in a similar case, in the context of the 2021 early parliamentary elections, Chisinau Court of Appeal⁵³ noted the considerations of the Constitutional Court⁵⁴, which clarified that "the decisions of the Central Electoral Commission regarding the opening of polling stations are not individual administrative acts but are normative administrative acts. They are adopted to implement the relevant provisions of the Electoral Code, concern an indeterminate number of subjects, and have a general character. Therefore, in the case of contesting such decisions in court, it is not necessary to go through the prior procedure."

Referring to the decision in the case PSRM vs. CEC of 20 September 2024, it is concluded that Chisinau Court of Appeal incorrectly applied the legal provision of Article 208, paragraph (3) of the Administrative Code.

On 23 September 2024, PSRM filed an appeal against the decision of Chisinau Court of Appeal of 20 September 2024. Accordingly, the Supreme Court of Justice examined the appeal within two days, and on 25 September 2024, it declared it inadmissible⁵⁵.

3. On 17 September 2024, Chisinau Court of Appeal registered an action filed by Gheorghe Guzun against CEC. The subject of the action was CEC's response, in which the central electoral authority refused to issue him subscription lists. The court examined the action within three days and declared it inadmissible⁵⁶, reasoning that the claimant had not rectified the deficiencies.

4. On 20 September 2024, an action was filed in Chisinau Court of Appeal by Tudor Soilita. The claimant requested the annulment of the Regulation on organizing and implementing postal voting, approved by CEC Decision No. 2680 of 5 August 2024.

The court examined the action within 10 days and issued its decision on 30 September 2024⁵⁷, rejecting the action filed by Tudor Soilita as unfounded.

5. On 26 September 2024, the candidate Renato Usatii filed an action requesting that CEC be ordered to issue an additional decision confirming Alexandr Berlinschii as a trusted representative. The court

on 20 October 2024.

⁵² [Decision](#) of Chisinau Court of Appeal of 20.09.2024 in the case PSRM vs. CEC

⁵³ [Decision](#) of Chisinau Court of Appeal of 17.06.2021 in the case Electoral Bloc "Renato Usatii" and others against CEC.

⁵⁴ [Decision](#) of inadmissibility no. 94 of 15.06.2021, adopted by the Constitutional Court, para. 30.

⁵⁵ [Ruling](#) of the Supreme Court of Justice in the case PSRM vs. CEC

⁵⁶ [Decision](#) of Chisinau Court of Appeal of 20.09.2024 in the case Gheorghe Guzun vs CEC

⁵⁷ [Operative part of the Decision](#) of Chisinau Court of Appeal in the case Tudor Soilita vs. CEC

examined the case within four days, and on 30 September 2024, it issued a decision⁵⁸ rejecting the action.

The court noted that "considering the fact that Alexandr Berlinschii held the position of a CEC member, and his membership was terminated based on Parliament Decision No. 88 of 12 April 2024, CEC rightly considered the prohibitions set forth in Article 20 of the Law on declaration of assets and personal interests, No. 133 of 17 June 2016, and refused to register Alexandr Berlinschii as a trusted representative on behalf of Renato Usatii, a candidate in the presidential elections of the Republic of Moldova on 20 October 2024.

6. On 27 September 2024, Chisinau Court of Appeal registered the action filed by OP and Renato Usatii against CEC, concerning the annulment of CEC Decision no. 2946 of 24 September 2024. In the action, Renato Usatii contested CEC's decision regarding the claimant's complaint about a donation made to the church of Niscani by electoral candidate Maia Sandu.

The Court of Appeal examined the case in four days, and on 1 October 2024 issued the operative part of the decision⁵⁹ on this case, dismissing Renato Usatii's claim as unfounded.

7. On 27 September 2024, Igor Munteanu and CUB submitted a case to Chisinau Court of Appeal, requesting the annulment of CEC's decision to refuse to register him as a candidate for President. The court examined the case within five days and issued its decision on 01 October 2024⁶⁰, rejecting the case filed by Tudor Soilita as unfounded.

8. On 30 September 2024, PDCM filed an action at Chisinau Court of Appeal, requesting that CEC be compelled to examine a complaint alleging violations by candidate Maia Sandu for involving minors in the electoral campaign.

The court examined the action within three days and issued its decision on 02 October 2024⁶¹, rejecting the action filed by Tudor Soilita as unfounded.

During the observation period, Promo-LEX OM noted that the cases were reviewed by the courts within a timeframe varying from 2 to 10 days. Note that the timeframe for reviewing complaints was exceeded in two cases, by one day and by four days, respectively. Also note that according to the Electoral Code⁶², during the electoral period, courts must examine complaints within three days, with the possibility of extending this period by two days in complex cases.

3.4. Activity of law enforcement bodies

On 1 October 2024, the National Anticorruption Center carried out criminal prosecution actions in Comrat as part of criminal cases initiated on money laundering, falsification of financial reports, and illegal financing of a political party.

Thus, according to the Center's statement⁶³, during the documentation process, several episodes were recorded involving the mobilization of citizens to participate in protests in exchange for

⁵⁸ [Decision](#) of Chisinau Court of Appeal in the case Renato Usatii and Alexandru Berlinschii vs. CEC

⁵⁹ [Operative part](#) of the decision in the case Renato Usatii vs. CEC

⁶⁰ [Operative part of the Decision](#) of Chisinau Court of Appeal of 01.10.2024 in the case Igor Munteanu and CUB vs CEC

⁶¹ [Operative part of the Decision](#) of Chisinau Court of Appeal of 02.10.2024 in the case PDCM vs. CEC

⁶² [Electoral Code](#), Article 100 para. (1) and (9)

⁶³ [Statement](#) of the National Anticorruption Center of 1 October 2024

monetary rewards, illegal payments made to passenger transporters for organized protests, as well as salaries paid to the party's activists. Additionally, the payment of bonuses to pensions and salaries for some public employees through the "PSB" application of the Russian Federation's Promsvyazbank was found. A total of 51 searches were conducted on 20 suspects, including in their offices located in the Comrat territorial organization of the political party in question. Moreover, searches were carried out at the suspects' homes and in their cars.

On 3 October 2024, in a press conference⁶⁴ organized by the General Police Inspectorate (GPI) and the Anticorruption Prosecutor's Office, the law enforcement authorities announced that searches had taken place that morning as part of a criminal case on the financing of political parties, voter bribery, and money laundering.

The head of the GPI, Viorel Cernauteanu, stated that the criminal case established that approximately 15 million dollars were transferred in September for the purpose of bribing voters, destabilization activities, etc. Additionally, the head of the GPI declared that in contravention cases, it was identified that approximately 130,000 voters had received money as part of bribery efforts. During the press conference, a video was shown presenting informational materials related to the "Victory" electoral bloc and the "Chance" Party.

⁶⁴ [Press conference](#) of 03.10.2024, organized by the General Police Inspectorate and the Anticorruption Prosecutor's Office

IV. DESIGNATION AND REGISTRATION OF ELECTORAL COMPETITORS

4.1. Registration of candidates for the office of President

On 24 September 2024, the deadline for submitting registration files for presidential candidates ended. Of the 13 initiative groups (IGs) that collected signatures in support of the candidates, 12 submitted their registration files and subscription lists (hereinafter SL) to CEC. Independent candidate Alexandru Arseni returned the subscription lists without requesting his registration in the electoral race.

Table no. 2. Submission of registration files

No.	Candidate	Political party/ Independent candidate	IG registration date	SL submission date	Examination date	Status
1.	Alexandr Stoianoglo	PSRM	23.08.2024	26.08.2024	CEC Decision no. 2802 of 02.09.2024	Registered
2.	Maia Sandu	PAS	24.08.2024	06.09.2024	CEC Decision no. 2843 of 12.09.2024	Registered
3.	Renato Usatii	PN	24.08.2024	12.09.2024	CEC Decision no. 2890 of 18.09.2024	Registered
4.	Vasile Tarlev	FMP	03.09.2024	13.09.2024	CEC Decision no. 2891 of 18.09.2024	Registered
5.	Ion Chicu	PDCM	23.08.2024	16.09.2024	CEC Decision no. 2911 of 21.09.2024	Registered
6.	Irina Vlah	IC	24.08.2024	16.09.2024	CEC Decision no. 2912 of 21.09.2024	Registered
7.	Andrei Nastase	IC	26.08.2024	18.09.2024	CEC Decision no. 2931 of 23.09.2024	Registered
8.	Victoria Furtuna	IC	26.08.2024	19.09.2024	CEC Decision no. 2941 of 24.09.2024	Registered
9.	Octavian Ticu	TOGETHER EB	23.08.2024	19.09.2024	CEC Decision no. 2932 of 23.09.2024	Registered
10.	Igor Munteanu	CUB	24.08.2024	20.09.2024	CEC Decision no. 2942 of 24.09.2024	Rejected
11.	Natalia Morari	IC	27.08.2024	20.09.2024	CEC Decision no. 2943 of 24.09.2024	Registered
12.	Tudor Ulianovschi	IC	24.08.2024	20.09.2024	CEC Decision no. 2944 of 24.09.2024	Registered

Following verification of candidates' files and subscription lists, 11 candidates were registered for the presidential election, of which five are independent candidates, five were designated by political parties, and one candidate was designated by an electoral bloc.

Compared to the presidential elections of 2020, when 8 candidates were registered, the number of competitors in this election has increased. Additionally, the proportion of women candidates has risen from 25% in 2020 to 36% in 2024. We also note an increase in the number of independent candidates, in contrast to the previous presidential election, where only one independent candidate was registered.

In this election, CEC rejected the registration of a presidential candidate in one case—Igor Munteanu, designated by CUB. According to CEC decision no. 2942 of 24 September 2024, following the verification of 17,357 signatures from supporters, the Commission found that the number of signatures supporting the candidate fell below the minimum threshold of 15,000 established by law, as well as the fact that the initiative group did not present valid signature lists from at least 600 supporters, from at least half of the second-level administrative territorial units (ATUs)—only the lists from 12 ATUs (out of 22 ATUs) contained the minimum required number of valid signatures.

Of the total signatures processed, 14,827 were valid, while 2,530 were declared invalid in accordance with the provisions of Article 67 paragraphs (4) and (5) of the Electoral Code and point 163 subpoint 2) of the Regulation on the establishment and registration of initiative groups, preparation, presentation, and verification of subscription lists, approved by CEC Decision no. 1166/2023.

4.2. Collection of supporter signatures and verification of subscription lists

As far as the use of the "Electronic Subscription List" Information Subsystem (ESL IS) in the process of collecting signatures is concerned, we note that voters practically did not use it. Signatures from only 198 supporters for 11 candidates were collected through the subsystem, (see Table 3).

The Observation Mission analysed CEC's decisions regarding the examination of candidate registration requests and the informative notes regarding the results of the verification of subscription lists, finding that on average, about 14% of the signatures verified by CEC were declared invalid. Compared to the previous presidential election, the number of signatures declared invalid decreased from 16% (2020) to 14% (2024), which could be attributed, among other factors, to the review of the grounds for invalidating signatures, allowing the same voter to support multiple candidates with their signature.

The fewest signatures declared invalid were for candidate Maia Sandu (5%), while the most were for candidate Victoria Furtuna (26%).

Table 3: Subscription lists submitted by candidates

No.	Candidate	No. of ATU, level II	Collection period	Verified signatures	Signatures ESL	Valid signatures	Invalid signatures	Percentage of invalid signatures
1.	Alexandr Stoianoglo	27	3 days	19,368	0	17,925	1 443	7%
2.	Maia Sandu	31	13 days	19,734	82	18,580	966	5%
3.	Renato Usatii	26	18 days	18,056	9	16,353	1 703	9%
4.	Vasile Tarlev	26	10 days	18,867	3	16,338	2 529	13%
5.	Ion Chicu	25	24 days	18,210	9	16,516	1 694	9%
6.	Irina Vlah	23	23 days	18,464	8	16,016	2 448	13%
7.	Andrei Nastase	26	23 days	19,224	5	16,139	3 085	16%
8.	Victoria Furtuna	24	24 days	22,022	11	16,397	5 625	26%

9.	Octavian Ticu	28	27 days	17,492	11	15,031	2 461	14%
10.	Igor Munteanu	22	27 days	17,357	5	14,827	2 530	15%
11.	Natalia Morari	26	24 days	18,954	25	15,210	3 744	20%
12.	Tudor Ulianovschi	22	27 days	18,055	30	15,106	2 949	16%

Analysing the periods for collecting signatures by IGs, we found that the signatures supporting candidate Alexandr Stoianoglo were collected in the shortest timeframe of only three days. The longest period for collecting signatures was 27 days, during which three IGs collected the necessary number of signatures in support of candidates Octavian Ticu, Igor Munteanu, and Tudor Ulianovschi.

Following the verification of SL and signatures from supporters, the Commission found violations of the provisions of the Electoral Code, which led to the invalidation of at least 23 subscription lists and 31,177 signatures from supporters. The subscription lists were invalidated under the following circumstances:

- The SL is of a different model or series than those issued by the electoral body;
- The SL is not signed by the collector and/or the name/surname of the collector is missing;
- Unauthorized collector.

Note that there was one case where a candidate's SL was found in another candidate's file, and vice versa (candidates Victoria Furtuna and Igor Munteanu). Additionally, public order and national security authorities reported to CEC several cases of signatures being collected by unauthorized collectors:

- 1) Involvement of a criminal investigation officer from Floresti Police Inspectorate in the actions of collecting signatures in support of candidate Irina Vlah. As a result, CEC decided that it would not consider the signatures collected in Floresti;
- 2) Collection of signatures in support of Victoria Furtuna by the parish priest of the Church in Miciurin village, Drochia district. CEC decided that it would not consider the signatures in that subscription list;
- 3) Collection of signatures in support of Victoria Furtuna by individuals not part of the initiative group (two requests received from SIS, and one from Floresti Police Inspectorate). As the public order and national security authorities failed to indicate the number of subscription lists on which these signatures were collected, CEC was unable to take this information into account during the signature verification.

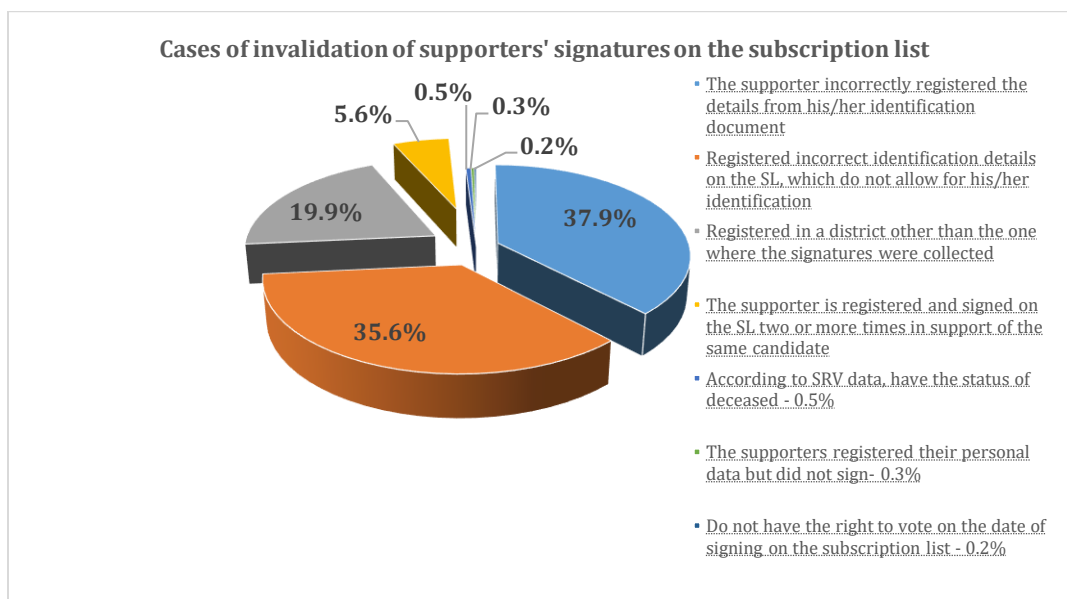
Regarding the circumstances of the invalidation of supporters' signatures, we observe that most invalidations occurred under the following conditions: the supporter incorrectly filled in the data from their identity document (37.9%), and the supporter provided erroneous identity data in the SLs, preventing their identification (35.6%).

In 19.9% of invalidation cases, the supporter who signed the lists was registered in a different district than the one where the signatures were collected. We thus note that for this presidential election, the procedure for collecting signatures from supporters underwent changes with the adoption of Electoral Code no. 325/2022, specifically that the subscription list must contain only signatures from supporters from the same second-level administrative territorial unit (ATU).

We remind that previously, according to Electoral Code no. 1381/1997, the subscription lists could only include signatures from supporters residing in a single locality. Although a similar provision in

the new Electoral Code was introduced to facilitate the signature collection process, we find that such invalidation cases persist.

Graph no. 2.



In cases of invalidation concerning the status of supporters at the time of signing, we note a significant number of instances (193) where the verified supporters are recorded as deceased, according to SRV data. We note a concerning trend, as the collectors, by applying their signature on each list, confirm that the signatures of the supporters were collected by them personally and that the identity of the individuals whose names appear on the lists was verified by them based on identity documents.

4.3. Registration of participants in the constitutional republican referendum

From 21 August to 20 September 2024, CEC received and examined 19 requests for registration as participants from 17⁶⁵ political parties and TOGETHER EB.

Table no. 4. Requests for registration as a participant in the referendum

No.	Participant	Option	File submission date	Status	CECD examination date
1.	PCRM	NO	21.08.2024	Registered	CEC Decision no. 2723 of 23.08.2024
2.	EGP	YES	26.08.2024	Registered	CEC Decision no. 2755 of 29.08.2024
3.	RMM	YES	29.08.2024	Registered	CEC Decision no. 2759 of 31.08.2024
4.	ALDE	YES	30.08.2024	Registered	CEC Decision no. 2803 of 02.09.2024

⁶⁵ESDP repeatedly submitted the request for registration as a participant.

5.	RP	NO	03.09.2024	Registered	CEC Decision no. 2823 of 06.09.2024
6.	SP	NO	04.09.2024	Registered	CEC Decision no. 2829 of 07.09.2024
				Revoked	CEC Decision no. 2864 of 14.09.2024
7.	ESDP	YES	05.09.2024	Rejected	CEC Decision no. 2830 of 23.08.2024
8.	CUB	YES	10.09.2024	Registered	CEC Decision no. 2844 of 23.08.2024
9.	TOGETHER EB	YES	10.09.2024	Registered	CEC Decision no. 2845 of 23.08.2024
10.	PAS	YES	10.09.2024	Registered	CEC Decision no. 2846 of 23.08.2024
11.	MAN	YES	13.09.2024	Registered	CEC Decision no. 2873 of 16.09.2024
12.	PPDA	YES	17.09.2024	Registered	CEC Decision no. 2905 of 19.09.2024
13.	PACE	YES	18.09.2024	Rejected	CEC Decision no. 2913 of 23.08.2024
14.	AUR	YES	19.09.2024	Registered	CEC Decision no. 2914 of 23.08.2024
15.	NOI	YES	20.09.2024	Registered	CEC Decision no. 2927 of 23.08.2024
16.	AT HOME	YES	20.09.2024	Registered	CEC Decision no. 2928 of 23.08.2024
17.	ESDP	YES	20.09.2024	Registered	CEC Decision no. 2929 of 23.08.2024
18.	VPP	NO	20.09.2024	Rejected	CEC Decision no. 2930 of 23.08.2024
19.	WPP	YES	20.09.2024	Registered	CEC Decision no. 2945 of 23.08.2024

Following the examination of requests and documents, 15 participants were registered for the referendum, of which 13 chose "YES" option and 2 chose "NO" option. All requests were reviewed within 3 days, as stipulated in Article 200, paragraph (2) of the Electoral Code.

During the examination process, the Commission rejected 3 registration requests from referendum participants and recorded one case of revocation⁶⁶ of a registration decision.

Similarly, the registration request from "WILL OF THE PEOPLE" Political Party was examined during two sessions of the Commission. At the Commission meeting on 23 September 2024, a draft resolution was presented regarding the rejection of registration due to failure to submit documents certifying the establishment of the numerical and nominal composition of the National Political

⁶⁶ By the decision of the Balti Court on 16 August 2024, the activity of "Chance" Political Party was limited for a period of 3 months. Details can be found in [Report no. 2 of the Observation Mission for elections on 20 October 2024](#), p. 33

Council and the list of individuals present at its meeting. This draft resolution did not gather the necessary number of votes on the ground that failure to submit the requested documents could not serve as a basis for non-registration. According to statements made during the meeting, all applicants who submitted requests for registration as participants underwent the same procedure, and the aforementioned documents were additionally requested.

Thus, the request for registration as a participant in the referendum was forwarded for re-examination to another rapporteur, and at the meeting on 24 September, the project regarding registration of WPP as a participant in the referendum was presented and approved.

In this context, Promo-LEX Observation Mission emphasizes the importance of uniformly applying electoral procedures for all competitors. In addition, if deficiencies are identified during the examination of registration requests that do not allow a decision to be made based on the set of documents submitted in accordance with current legal provisions, we recommend that CEC subsequently intervene with proposals to modify and adjust the legal framework to streamline the process in future elections.

Refusals of registration of participants in the referendum. During the entire registration period, the registration requests from three political parties to participate in the referendum were rejected on the following grounds:

- ESDP - lack of the necessary quorum to declare the meeting of the National Political Council of the party deliberative⁶⁷,
- PACE - the decision to participate in the republican referendum was approved by a body other than the competent one according to the statute.
- "VICTORY" Political Party (VPP) - failure to submit the additional documents requested by the Commission certifying the establishment of the numerical and nominal composition of the Central Permanent Bureau and the list of persons present at the meeting in which the decision to participate in the referendum was made. In the case of VPP, the Commission also found that the request for registration as a participant in the referendum was, in fact, pursuing the hidden purpose of legalizing the promotion of a political option through a camouflaged and unofficially registered electoral bloc (the refusal to register the electoral bloc "VICTORY - ПОБЕДА"⁶⁸).

⁶⁷ Case described in [Report no. 2 of the Observation Mission for elections on 20 October 2024](#), p. 33

⁶⁸Through [CEC Decision no. 2687/2024](#), the Commission refused to register the electoral bloc "VICTORY - ПОБЕДА." Details can be found in [Report no. 1 of Promo-LEX Observation Mission for elections on 20 October 2024](#), p. 21.

V. PERFORMANCE OF ELECTORAL COMPETITORS

5.1. Activity of electoral competitors and participants in the referendum

In the first ten days of the electoral campaign, Promo-LEX observers reported at least 792 activities aimed at promoting candidates for the presidency and the constitutional referendum (see Table no. 5).

According to the reported information, most activities - 286 (36%)—were conducted by PAS and Maia Sandu (PAS). Most of the electoral promotion events had a mixed nature, promoting both Maia Sandu (PAS) and the constitutional referendum. Alexandr Stoianoglo (PSRM) followed with a minimum of 217 promotional activities, while Renato Usatii conducted at least 104 activities.

Table no. 5. Campaign/ information activities

<i>Promoted electoral scrutiny</i>	<i>Distribution of informational materials</i>	<i>Meetings with voters</i>	<i>Field trips</i>	<i>Others</i>	<i>Protests/flash mobs</i>	<i>Press conferences</i>	<i>Total</i>
Events carried out by electoral competitors							
Mixed	168	51	34	2	0		255
PAS	168	51	33	2			254
TOGETHER EB			1				1
Presidential	316	56	27	10		10	419
Alexandr Stoianoglo (PSRM)	186	22	4	2		3	217
Renato Usatii (OP)	85	11	6	2			104
Ion Chicu (PDCM)	17	6	6			1	30
Maia Sandu (PAS)	8	6	5	1		3	23
Vasile Tarlev (FMP)	15	2	1				18
Irina Vlah (IC)	4	7	2	1			14
Octavian Ticu (Together EB)	1		3	1		1	6
Andrei Nastase (IC)				2		1	3
Tudor Ulianoschi (IC)		1				1	2
Natalia Morari (IC)				1			1
Victoria Furtuna (IC)		1					1
Referendum	46	27	4	3	13	2	95
RP/PB Victory	27	24	2	2	12	2	69
MAN	12						12
PAS	4	2	2	1			9
PCRM	3	1			1		5
Events carried out by other stakeholders							
Referendum	1	11	0	2	9	0	23
Citizens for Europe	1	11		2			14
Voters in the country/ Diaspora					9		9
Total	531	145	65	17	22	12	792

According to the locations of the activities, most took place in Chisinau (16%), followed by Balti (12%), and Floresti, Donduseni, and Soroca, each accounting for 4%.

In the case of activities carried out by the RP/PB Victory, it is important to note that only the RP is registered as a participant in the referendum. However, during the observed electoral events, it was noted that the organizers are affiliated with all the constituent parties of PB Victory, and the promotional materials used also represent PB Victory, such as bags and t-shirts bearing the inscription "Victory," as well as LED panels displaying the same message. Therefore, we find that the electoral promotion of the referendum (NO option) is, in fact, carried out by the same bloc whose registration was refused by CEC⁶⁹. We would like to remind you that PB Victory is a political entity

⁶⁹ CEC [Decision](#) No. 2687 regarding the registration request of the electoral bloc "VICTORY - ПОБЕДА" to

lacking legal status, founded on 21 April 2024, in Moscow, Russian Federation. It comprises four registered political parties in the Republic of Moldova (RP, CHANCE, AFSM, and VPP), all of which are affiliated with Ilan Sor.

On the same topic, it is worth noting that the electoral meetings organized by RP/PB Victory are not publicly advertised; they are communicated exclusively through private Telegram channels, and transportation for voters is arranged. Also, according to these channels, these meetings may occur twice on the same day at the same location due to the large number of participants (for example, the first meeting may be at 4 PM, and the second at 7 PM). Furthermore, the organizers maintain a strict record of participants based on pre-completed lists, making random participation difficult.

According to some interlocutors of Promo-LEX observers, in addition to promoting the NO option in the referendum, the electoral meetings held by RP/PB Victory also promote the option of NOT voting for candidate Maia Sandu (PAS).

From the same closed sources on certain Telegram channels, it was found that RP/PB Victory pays for organizing so-called "solitary pickets" (protests/flashmobs) that require at least nine participants, with each receiving 200 lei for their participation. In this type of event, the visibility signs of RP/PB Victory are not used; instead, only placards with various slogans (Anti-EU, etc.) are present. According to Promo-LEX observers, protests/flashmobs with a small number of participants have also been organized abroad (London, UK; Paris, France; Moscow, Russian Federation, etc.).

5.2. Electoral advertising

In the first ten days of the campaign, Promo-LEX observers reported at least 1,711 instances of electoral advertising used to promote presidential candidates and the constitutional referendum (see Table 6). The most commonly used forms were visibility materials (vests, bags, caps, etc.) – 34%, followed by printed informational materials (leaflets, flyers) – 21%, and sponsored advertisements – 21%.

Table no. 6. Instances of electoral advertising usage

<i>Forms of advertising/election campaign</i>	<i>Vests, bags, caps, etc.</i>	<i>Newspapers, leaflets, flyers, etc.</i>	<i>Billboards, tents</i>	<i>Sponsored posts</i>	<i>Video spots</i>	<i>Google ads</i>	<i>TOTAL</i>
Advertising used by electoral competitors							
Mixed	199	151	69	118	11		548
PAS	199	151	69	118	11		548
Presidential	333	191	254	59	25	15	877
Alexandr Stoianoglo (PSRM)	194	103	97		7	2	403
Renato Usatii (OP)	90	74	82	27	3	6	282
Maia Sandu (PAS)	11	7	52	21	4	4	99
Ion Chicu (PDCM)	17	2	15	2	1		37
Vasile Tarlev (FMP)	16	1	5		1		23
Natalia Morari (IC)				9	5	2	16
Irina Vlah (IC)	4	2			2	1	9
Octavian Ticu (Together EB)	1	1	1		1		4
Tudor Ulianoschi (IC)		1	1				2
Andrei Nastase (IC)			1				1
Victoria Furtuna (IC)					1		1
Referendum	50	8	16	43	4		121
RP/PB Victory	32	7	2	41	4		86
MAN	12						12
PCRM	4						4
PAS	2	1	14	2			19

participate in the constitutional republican referendum and the elections for President of the Republic of Moldova on 20 October 2024.

Advertising used by other stakeholders							
Referendum/election	4	2	9	137	13		165
Citizens for Europe	4	2	9	55	13		83
Veaceslav Platon				16			16
WatchDog.MD				22			22
Voice of Moldova				44			44
TOTAL	586	352	348	357	53	15	1,711

The majority of cases of advertising usage were for PAS and Maia Sandu (PAS) – 39%, followed by Alexandr Stoianoglo (PSRM) – 24%, and Renato Usatii (OP) – 16%. Additionally, Promo-LEX observers noted that Ion Chicu (PDCM) used banners for tents and informational materials printed during the activities of IG.

The rules for the use and distribution of electoral advertising are set out in the Regulation on the provision, distribution and dissemination of political and electoral advertising and messages of public interest⁷⁰ (hereinafter referred to as the Regulation). Thus, according to point 15 of the same Regulation, **using, during the electoral campaign, political advertising materials as electoral campaigning materials, is prohibited.** However, during the monitored period, violations of this provision were reported in the case of 4 electoral competitors, as follows:

- PAS – in at least 18 cases, the simultaneous use of political and electoral advertising was observed (flyers printed in July, banners, and billboards starting with June 2024, etc.);
- Renato Usatii (OP) – at least 4 cases of using billboards placed before the start of the electoral period (which were only replaced on 24-25 September 2024);
- Alexandr Stoianoglo (PSRM) – one case of using banners printed in June 2024 (as the wall of a tent);
- RP/PB Victory distributed anti-EU flyers/posters printed before the start of the electoral period.

According to points 19 and 97 of the Regulation, **each printed material must contain the following information:** readable, easily decipherable, and understandable name of the supplier who ordered it, the title of the subject of the advertising; the title "Political Advertising," "Electoral Advertising"; the identification details of the specialized economic entity that provided the printing service, and, if applicable, the name of the person who created the design and/or layout of the printed material; the executed print run, the order number, and the invoice number. However, deviations from these provisions were noted in the electoral advertising of three candidates:

- Renato Usatii (OP), whose street billboards and banners used as walls of tents did not contain data on the executed print run;
- Alexandr Stoianoglo (PSRM) – invitations to an electoral meeting in Ocnita were observed without printing data;
- RP/PB Victory distributed at least three types of anti-EU flyers/posters without printing data (throughout the state).

According to point 76 of the same normative act, **placing electoral advertising** on public transport station pavilions, on trees and/or by damaging/destroying trees, on poles, in cemeteries, places of worship, squares, parks, public gardens, on crosses, the outside of windows and balconies of residential blocks, fences of private households, as well as on their surrounding elements, etc. **is prohibited.** Placing advertising outside the designated locations constitutes a contravention and is

⁷⁰ CEC [Regulation](#) on the provision, distribution and dissemination of political and electoral advertising and messages of public interest, approved by CEC Decision no. 1155 of 4 August 2023.

sanctioned under the Contravention Code. This provision is not new, as it was carried over from the previous legal framework, with additional locations specified where advertising placement is prohibited (e.g., crosses, residential balconies).

Despite these rules, at least 20 cases of placing/distributing electoral advertising in unauthorized locations were observed. Of these, in 18 cases (90%), RP/PB Victory was targeted, and one case involved Alexandr Stoianoglo (PSRM).

5.3. Abusive use of administrative resources

The definition and concept of administrative resources, as well as their abusive use in the context of elections, including the referendum, were analysed in previous Promo-LEX reports⁷¹.

During the monitored period, Promo-LEX observed at least 32 cases of abusive use of administrative resources, of which 30 cases involved PAS and Maia Sandu (PAS), and one case each involved RP/PB Victory and Ion Chicu (PDCM).

- *Participation in campaign activities by public officials targeted PAS and Maia Sandu (PAS) – at least 11 cases;*

This category included cases of electoral campaigning involving public officials, heads of central public authorities involved in ensuring the conduct of elections, regardless of when the campaigning took place (on weekends or working days). On 22 September 2024, Dorin Recean, Prime Minister of the Republic of Moldova, held a meeting with voters in the locality of Step-Soci, Orhei district, urging them to vote for Maia Sandu (PAS) as President and vote "YES" in the referendum.

On 22 September 2024, Dorin Recean, Prime Minister of the Republic of Moldova, held a meeting with voters in the locality of Susleni, Orhei district, urging them to vote for Maia Sandu (PAS) as President and "YES" in the referendum.

Note that the position held by Dorin Recean – Prime Minister of the Republic of Moldova, cannot be separated from him on weekends in such a way that his political image does not influence voters' opinions. For comparison, we note that two days after the electoral campaigning in Orhei, on 24 September 2024, Dorin Recean paid a working visit to Riscani, when he met with citizens and state institution employees. At this meeting, in addition to the topics discussed, the Prime Minister urged citizens to participate in the presidential elections and referendum on 20 October (without mentioning Maia Sandu (PAS) as President or urging them to vote "YES" in the referendum, as he did two days earlier).

On 26 September 2024, Dumitru Alaiba, Minister of Economic Development and Digitalization, held an electoral meeting with employees of SA RED-Nord and PSA about Moldova's European future and urged employees to vote for Maia Sandu and choose "YES" option in the referendum.

On 28 September 2024, Alexei Buzu, Minister of Labor and Social Protection, along with Dumitru Alaiba, Minister of Economic Development and Digitalization, distributed printed materials promoting candidate Maia Sandu (PAS) and "YES" option in the referendum in the villages of Cocieri, Cosnita, Oxentea, and Dorotcaia, Dubasari district.

⁷¹ [Report](#) no. 1: Promo-LEX Mission Observation Mission for the presidential election and the constitutional referendum of 20 October 2024, p. 29.

Also, at least 7 PAS deputies were observed conducting electoral campaigning during working hours⁷².

- *During the monitored period, there were 21 cases of electoral agitation involving public sector employees during working hours.* Out of these, 19 cases involved PAS and Maia Sandu (PAS), while there was one case each for RP/PB Victory and Ion Chicu (PDCM).

PAS and Maia Sandu (PAS)

On 20 September 2024, during Maia Sandu's campaign launched at 5:00 PM, several officials attended during working hours: Sergiu Armasu, mayor of Ialoveni Natalia Eremia, president of Ialoveni District Victoria Butuc Guranda, mayor of Ialoveni Veaceslav Cernat, deputy mayor of Ialoveni.

Festival of Iacob Ciachir, 5th edition, organised on 21 September 2024 under the auspices of Ungheni District Council, Ungheni mayor's office, the Junior Chamber Association of Ungheni, and the Equestrian School. The event was attended by the mayor of Ungheni and Dorin Recean, the Prime Minister of the Republic of Moldova. The latter used the event to urge participants to go to the polls to vote for Maia Sandu (PAS) and for a "YES" on the referendum.

On 24 September 2024, Maia Sandu (PAS) held an electoral meeting with the staff and patients of Puhoi Health Center in the Ialoveni district during the institution's working hours. The meeting was also attended by Natalia Eremia, the president of Ialoveni district, and Nadejda Carajea, the mayor of Puhoi.

On 24 September 2024, Alexei Cojocaru, the mayor of Mitoc, Orhei, distributed promotional newspapers for the candidate Maia Sandu (PAS) and "YES" option for the referendum during working hours.

On 24 September 2024, Victor Matraguna, head of the Territorial Office of the State Chancellery in Orhei, distributed promotional newspapers for candidate Maia Sandu (PAS) and "YES" option for the referendum during working hours.

On 24 September 2024, Radu Birna, deputy head of the Territorial Office of the State Chancellery in Causeni, and Nicolae Casulschi, a specialist in the Territorial Office of the State Chancellery in Causeni, distributed promotional newspapers for candidate Maia Sandu (PAS) and "YES" option for the referendum during working hours.

On 24 September 2024, in Calarasi district, during working hours, Tatiana Rotari, head of the Territorial Office of the State Chancellery in Calarasi, Nicolae Draganel, president of Calarasi district, Ion Revenco, vice president of Calarasi district, Grecu Gheorghe, mayor of Oniscani, and Victor

⁷² Larisa Novac – Distributed newspapers (Floresti, 26 and 27 September).

Mariana Cusnir – Distributed newspapers (Orhei, 26 September).

Radu Marian – Held electoral meetings (Soldanesti, 26 September).

Petru Frunze – Distributed newspapers (Rusestii Noi, Ialoveni, 27 September).

Liliana Grosu – Held electoral meetings (Balti, 27 September).

Iulia Dascalu – Distributed newspapers (Chisinau, 24 September).

Ana Oglinda – Distributed newspapers (Anenii Noi, 25 September).

Ambroci, mayor of Calarasi town, engaged in electoral campaigning for Maia Sandu (PAS) and "YEES" option for the referendum by distributing informational materials and holding meetings with voters.

On 25 September 2024, Maia Sandu (PAS) held an electoral meeting with the staff of Mihai Eminescu High School in Straseni during working hours. Lucia Caciuc, the head of the General Education Directorate of Straseni, was also present at the meeting.

On 25 September 2024, in Soroca, Ion Babici, PAS deputy, and Veaceslav Burlacu, head of the Territorial Office of the State Chancellery, distributed promotional newspapers for candidate Maia Sandu (PAS) and "YES" option for the referendum during working hours.

On 25 September 2024, at an electoral meeting with voters from Ciocalteni, Orhei, in support of candidate Maia Sandu (PAS) and "YES" option for the referendum, Mariana Cusnir, Member of Parliament, and Liubovi Buciuscanu, mayor of Ciocalteni, participated during working hours.

On 25 September 2024, an electoral meeting organized by Maia Sandu (PAS) took place with approximately 350 women, ambassadors of Moldova's EU accession. Stela Baidu, mayor of Valea Perjei, and Siloci Nina, director of the Batar Gymnasium in Cimisia, participated in this meeting during working hours.

On 26 September 2024, Radu Marian, PAS deputy in the Parliament of the Republic of Moldova, organized an electoral meeting with the staff of the gymnasium in Salcia, Soldanesti, during working hours. Aliona Pinzari, president of Soldanesti district, was also present at the event.

On 26 September 2024, Ungheni District Youth Center, together with Ungheni District Youth Council, with support from Ungheni District Council and Ungheni Education Directorate, organized the Ungheni District Youth Forum. During the event, Dionisie Ternovschi, president of Ungheni district, expressed his support for Maia Sandu (PAS) in his speech and emphasized the importance of participating in the referendum. He urged attendees to vote in favour of the European path and encouraged them to tell their parents and grandparents to make the same choice.

On 26 September 2024, Andrian Cheptonar, a PAS deputy, held two electoral meetings during the working hours of employees at two institutions—the gymnasium and kindergarten in Pirlita, Ungheni.

On 26 September 2024, Roman Rosca, PAS deputy in the Parliament of the Republic of Moldova, organized an electoral meeting with the staff of Holercani educational institution, Dubasari, during working hours.

On 27 September 2024, Igor Chiriac, PAS deputy in the Parliament of the Republic of Moldova, organized an electoral meeting with the employees of Grinauti Agroindustrial College in Ocnita during working hours.

On 27 September 2024, Igor Chiriac, PAS deputy in the Parliament of the Republic of Moldova, organized an electoral meeting with the staff of the gymnasium in Clocusna, Ocnita, during working hours.

On 27 September 2024, Igor Chiriac, PAS deputy in the Parliament of the Republic of Moldova, organized an electoral meeting with the staff of Ocnita PSA, during working hours.

On 28 September 2024, Alexandru Bordeinii, Deputy Head of Donduseni Territorial Office of the State Chancellery, during a live broadcast on social media in the context of distributing electoral materials in support of candidate Maia Sandu (PAS) and "YES" option in the referendum, announced that water supply networks were expanded in Horodiste, Donduseni, as part of the "European Village" program. The activist mentioned that this achievement was thanks to Maia Sandu.

RP/PB Victory

On 26 September 2024, at an electoral meeting organized by PB Victory with voters from Orhei, Marina Tauber, Member of Parliament, Victor Pertu, Director of MI Regia Apa Canal Orhei, Cristina Cojocari, deputy mayor of Orhei, and Vasile Cojocaru, mayor of Pohrebeni commune, attended during working hours.

Ion Chicu (PDCM)

On 23 September 2024, in Costesti, Ialoveni, at an electoral meeting with citizens organized by Ion Chicu (PDCM), mayor of Cigirleni, Ialoveni, Sergiu Erizanu, also participated during working hours.

5.4. Organized transportation of voters to electoral events

Current legislation prohibits organized transportation of voters to polling stations on election day to influence their electoral rights. This action constitutes a violation and is subject to penalties. However, this rule does not apply during the electoral campaign for events leading up to election day.

Promo-LEX observers monitored how electoral meetings involving large groups of voters from various regions were organized. It was found that electoral competitors practised organized transportation of voters.

For instance, during the campaign launch event for Maia Sandu (PAS) in Chisinau on 20 September 2024, the local mayor of Magdacesti, Cojocaru Liuba (PAS), and representatives of the Criuleni Education Directorate verbally encouraged school staff to attend in large numbers. This message was conveyed via phone through the school principal and deputy directors. Around 15 people from the institution travelled in their personal vehicles. Although participant attendance wasn't officially recorded, teachers were urged to ensure their presence. Voters from Ungheni were also transported.

At Maia Sandu's (PAS) campaign launch in Soroca on 22 September 2024, participants compared Ilan Sor's meetings, where food was provided, to PAS events, where nothing was offered. Voters were brought from Drochia, Soldanesti, Edinet, Rascani, Glodeni, Falești, Ocnita, and Briceni. Drivers discussed the number of people transported, mentioning 3 to 4 minibuses.

Similarly, at the campaign launch event for Maia Sandu (PAS) in Cahul on 21 September 2024, organized transportation was provided for voters from Stefan Voda.

In the case of RP/PB Victory, during the protest against EU membership organized by RP/PB Victory on 22 September 2024, in Chisinau, organized transportation was ensured for voters from Balti, Floresti, and Falesti.

At the electoral meeting in Rosu, Cahul on 21 September 2024, organized by PB Victory about the referendum, at least 400 people attended, and organized transportation was provided from multiple localities.

At the voter meeting in Cantemir on 23 September 2024, organized by PB Victory regarding the referendum, organized transportation was provided for voters from several localities. Similarly, at the voter meeting in Donduseni on 29 September 2024, also organized by PB Victory, organized transportation was arranged for voters from various localities.

In the case of Alexandr Stoianoglo (PSRM), on 21 September 2024, in Taraclia, organized transportation was provided for voters from the district's localities for the candidate's electoral meeting. Around 400 people reportedly attended the event.

On 21 September 2024, in Cahul, organized transportation was provided for voters from the district for Alexandr Stoianoglo (PSRM) electoral meeting. Around 500 people reportedly attended the event.

5.5. Involvement of religious denominations in campaigns

The engagement of representatives from religious denominations in electoral campaigning, including activities conducted within places of worship, is subject to sanctions⁷³. Furthermore, the legal framework⁷⁴ prohibits any financial or material support for electoral competitors from religious denominations in any form. It is also forbidden to use images representing religious denominations or their components in electoral programs, electoral campaigning materials, electoral agitation actions, and in electoral advertising that targets electoral competitors in any way.⁷⁵

Contrary to the aforementioned, Promo-LEX observers reported at least three cases where representatives of religious institutions engaged in electoral campaigning, two of which directly targeted two electoral candidates – Victoria Furtuna (IC) and Maia Sandu (PAS).

On 21 September 2024, the parish priest of "Saint Mina" Church in Balti, in his sermon to parishioners, delivered anti-EU messages (including disinformation).

On 22 September 2024, during an electoral meeting in Peresecina, Orhei, organized by candidate Maia Sandu (PAS), the local church priest gave a message supporting the candidate and "YES" option in the referendum.

On 24 September 2024, the bishop of Balti and Falesti, Marchel, openly committed to campaigning for the presidential candidate Victoria Furtuna (IC), urging people to support her in the election.

5.6. Activities with the potential to corrupt voters

According to Article 181¹ of the Penal Code, offering or giving money, goods, services, or other benefits to influence a voter or supporter to exercise or not exercise their electoral rights in elections is punishable by a fine ranging from 750 to 1,150 conventional units (37,500 – 57,500 lei) or

⁷³ Article 52, para. (2) [Contravention Code](#).

⁷⁴ Article 54 para. (5) of the Electoral [Electoral Code](#).

⁷⁵ Article 70 para. (4) of the Electoral [Code](#):

imprisonment for 1 to 5 years, while a legal entity is fined between 6,000 and 8,000 conventional units (300,000 – 400,000 lei) and may lose the right to conduct certain activities or be dissolved.

During the observation period, at least seven cases were noted that could be classified as voter corruption, mainly involving PB Victory.

PB Victory. On 20 September 2024, in the context of a meeting organized by PB Victory with voters in Chistelnita, Telenesti, attended by at least 100 people, each was given a fabric bag with the symbol "Victorie/Victory", containing rice, buckwheat, bananas, and canned food, with an estimated value of 200 lei per bag.

On 20 September 2024, PB Victory leader Ilan Sor stated that at the request of farmers in UTAG, the Bashkan of Gagauzia, and the President of the People's Assembly, assistance would be provided through Eurasia NGO in the form of 5,000 tons of diesel, 4,000 tons of mineral fertilizers, and 3,000 tons of amorphous mineral fertilizers.

On 21 September 2024, in the context of a meeting organized by PB Victory with voters in Rosu, Cahul, attended by at least 400 people, each was given a fabric bag with the symbol "Victorie/Victory", each containing one box of chocolate. The bag also included a cup with the same inscription.

On 25 September 2024, in Balti, PB Victory informed on social media about providing a food basket to an elderly voter (including a pack of wheat flour, wheat groats, buckwheat, rice, porridge, pasta, a bottle of oil, and a jar of tomato sauce).

On 25 September 2024, it was found that PB Victory continued recruiting citizens as volunteers in the "Eurasia" organization. For this, several groups were created via the Telegram platform, where people were lured with money to become "volunteers" within the Eurasia NGO. Recruits had to provide copies of their ID cards and confirm their identity by sending a 5-10 second video selfie. To receive money, they were required to invite five more people into the group.

On 26 September 2024, in Cimislia, PB Victory representatives offered an elderly person a package containing rice, buckwheat, pasta, biscuits, candies, tea, 3-in-1 coffee, canned food (sprats in oil, meat, jam, condensed milk, pâté), and a bottle of oil. The entire event was filmed, and at the end, the elderly person was asked to say, "Thank you, Ilan Sor."

On 29 September 2024, on his Telegram channel, Ilan Sor, the leader of PB Victory, announced the launch of a chatbot (on Telegram) for their supporters. According to him, the chatbot already included over 800,000 people. To complete the registration process, 500 lei would be paid, and personal voter data (ID card information, bank account numbers) would be collected, posing a heightened risk to voter security since all this data ends up in an uncontrolled virtual space, potentially in the hands of a group from the Russian Federation.

After registration, participants in the group would receive various tasks to complete until election day, with each task being paid for (the day after completion). According to Ilan Sor, 2,000 lei would be paid for completing the minimum tasks, and if the majority in the voter's polling station voted "NO" in the referendum and for PB Victory-promoted candidate, the voter would receive a reward of 5,000 lei.

5.7. Acts of intimidation

On 26 September 2024, two PCRМ members (Iurie Bruma and Alexandru Nastas), who were distributing flyers promoting the "NO" option in the referendum, were detained by law enforcement near Septelici village, Soroca district, being escorted by several police units and held for 3 hours.

They were later released without being given a report or other document explaining the reason for their detention. The agitators' flyers (860 copies) were confiscated and not returned upon their release.

According to the police, suspicions about the electoral materials' compliance with current legislation underpinned their confiscation and the individuals' escort to the territorial police station for identification. The electoral materials were submitted to the Central Electoral Commission for assessment.

On 27 September 2024, a group of PCRМ activists organized a protest in front of Soroca Police Inspectorate, demanding the resignation of the officer who detained those PCRМ members.

On 29 September 2024, Irina Vlah (IC) planned her campaign launch in Naslavcea, Ocnita, at the panoramic point overlooking the heart-shaped island on the Dniester. When attempting to access this location, the candidate and her supporters were blocked by law enforcement representatives.

The restriction was reportedly for two reasons: the police were searching for criminals from Ukraine, with information about their illegal border crossing, and the second reason was that individuals with a residence permit more than 30 km from the border area are not allowed access to this zone or should have submitted a written request in advance.

According to a statement from the General Police Inspectorate on Telegram, the police did not intervene and had no communication with the people present there. Moreover, she urged the electoral competitor to substantiate the accusations, at least by publishing video clips or photographs of the police officer who is alleged to have "restricted the event."⁷⁶

⁷⁶ The Telegram [post](#) of the General Police Inspectorate.

VI. FINANCING OF ELECTIONS AND ELECTORAL CAMPAIGN

6.1. Financial reporting to CEC

6.1.1. Financial reporting in the context of presidential elections

The financial reporting process for electoral competitors includes several stages:

- *Designation and submission for confirmation of the person responsible for finances (treasurer);*

According to Article 55, paragraph (1) of the Electoral Code, the electoral competitor must designate and submit for confirmation a person responsible for finances (treasurer) to CEC. According to the official CEC page, all 11 electoral competitors have registered the person responsible for finances.

Table no. 7. Information on the financial reporting to CEC in the context of presidential elections

NO	Candidate	Political affiliation	Competitor registration	Treasurer registration	Campaign start report	Opening of the "Electoral Fund" account	Financial report (Deadline: 23.09.2024)	Financial report (Deadline: 30.09.2024)
1	Alexandr Stoianoglo	PSRM	02.09.2024	02.09.2024	02.08.2024	17.09.2024	23.09.2024	30.09.2024
2	Maia Sandu	PAS	12.09.2024	12.09.2024	29.08.2024	17.09.2024	24.09.2024	30.09.2024
3	Renato Usatii	PN	18.09.2024	18.09.2024	26.08.2024	19.09.2024	23.09.2024	30.09.2024
4	Vasile Tarlev	FMP	18.09.2024	18.09.2024		23.09.2024	23.09.2024	01.10.2023
5	Irina Vlah	IC	21.09.2024	21.09.2024		27.09.2024	information	30.09.2024
6	Ion Chicu	PDCM	21.09.2024	21.09.2024		17.09.2024	23.09.2024	30.09.2024
7	Andrei Nastase	IC	23.09.2024	23.09.2024		26.09.2024	-	01.10.2023
8	Octavian Ticu	TOGETHER EB	23.09.2024	23.09.2024	16.09.2024	25.09.2024	-	30.09.2024
9	Victoria Furtuna	IC	24.09.2024	24.09.2024		27.09.2024	-	30.09.2024
10	Tudor Ulianoschi	IC	24.09.2024	24.09.2024		26.09.2024	-	30.09.2024
11	Natalia Morari	IC	24.09.2024	24.09.2024		27.09.2024	-	30.09.2024

- *Opening of the "Electoral Fund" account;*

According to Article 56, paragraph (1) of the Electoral Code, within 3 days after registration, the electoral competitor must open an account at the bank with the mention "Electoral Fund". Subsequently, within 24 hours, information about the opened account must be submitted to CEC. In case of failure to open the account, the electoral competitor must inform CEC about this and carry out campaign activities that do not involve financial expenses.

According to CEC official page, all 11 electoral competitors have confirmed to CEC that the account entitled "Electoral Fund" was opened.

- *Weekly reporting on accumulated income and expenses incurred during the electoral campaign.*

According to Article 58, paragraphs (3) and (5) of the Electoral Code, electoral competitors must submit weekly reports to CEC, according to the schedule approved for in the Calendar Program⁷⁷, regarding the accumulated income and expenses incurred during the electoral campaign.

During the monitored period, the registered electoral competitors were required to submit their financial reports on 23.09.2024 and 30.09.2024. Table no. 7 contains the information regarding the submission of financial reports by the 11 electoral competitors, noting that the relevant information regarding the financing of the electoral campaign was submitted to CEC, either on time or after the established deadline.

6.1.2. Financial reporting in the context of constitutional referendum

The financial reporting for referendum participants follows the same stages as for electoral competitors. Table no. 8 reflects the data on financial reporting by the 15 registered referendum participants.

It was found that, in the case of 3 referendum participants (CUB, Together EB and AT HOME), treasurers were not confirmed by CEC decision.

As far as the collection of campaign revenues is concerned, only PAS submitted financial reports reflecting income and expenses for the electoral campaign of the constitutional referendum.

As of 30.09.2024, only 4 participants reported no expenses and income for the campaign (CUB, Together EB, PPDA, and OP). For the other 10 participants, as of 30.09.2024, no data regarding the financing of the electoral campaign is available on the official CEC page.

Table no. 8. Information on the financial reporting to CEC in the context of constitutional referendum

NO	Participant	Registration date	Treasurer	Campaign start report	Opening of the "Electoral Fund" account	Deadline: 23.09.2024	Deadline: 30.09.2024
1	PCRM	23.08.2024	06.09.2024		11.09.2024	information	
2	EGP	29.08.2024	31.08.2024	23.09.2024	24.09.2024	information	
3	RMM	31.08.2024	31.08.2024	02.09.2024	17.09.2024	23.09.2024	
4	ALDE	02.09.2024	02.09.2024		05.09.2024	information	
5	RP	06.09.2024	12.09.2024		24.09.2024	information	
6	CUB	12.09.2024				information	information
7	TOGETHER EB	12.09.2024		16.09.2024		information	information
8	PAS	12.09.2024	12.09.2024	29.08.2024	17.09.2024		30.09.2024
9	MAN	16.09.2024	16.09.2024	24.09.2024	20.09.2024		
10	PPDA	19.09.2024	19.09.2024				information
11	AUR	21.09.2024	29.09.2024		23.09.2024		
12	OP	23.09.2024	23.09.2024			information	information
13	AT HOME	23.09.2024				-	
14	ESDP	23.09.2024	23.09.2024	24.09.2024	25.09.2024	-	
15	WPP	24.09.2024	01.10.2024			-	

⁷⁷ The Calendar [Program](#) for carrying out the organization and conduct of elections for the President of the Republic of Moldova and the constitutional republican referendum of 20 October 2024.

According to the legal framework, the late submission or failure to submit financial reports by electoral competitors or referendum participants regarding campaign financing is sanctioned with a warning or a fine ranging from 90 to 300 conventional units⁷⁸. Additionally, for violations of electoral laws, the Central Electoral Commission (CEC) can apply or request the application of appropriate sanctions⁷⁹.

6.2. Income and expenses reported by electoral competitors to CEC

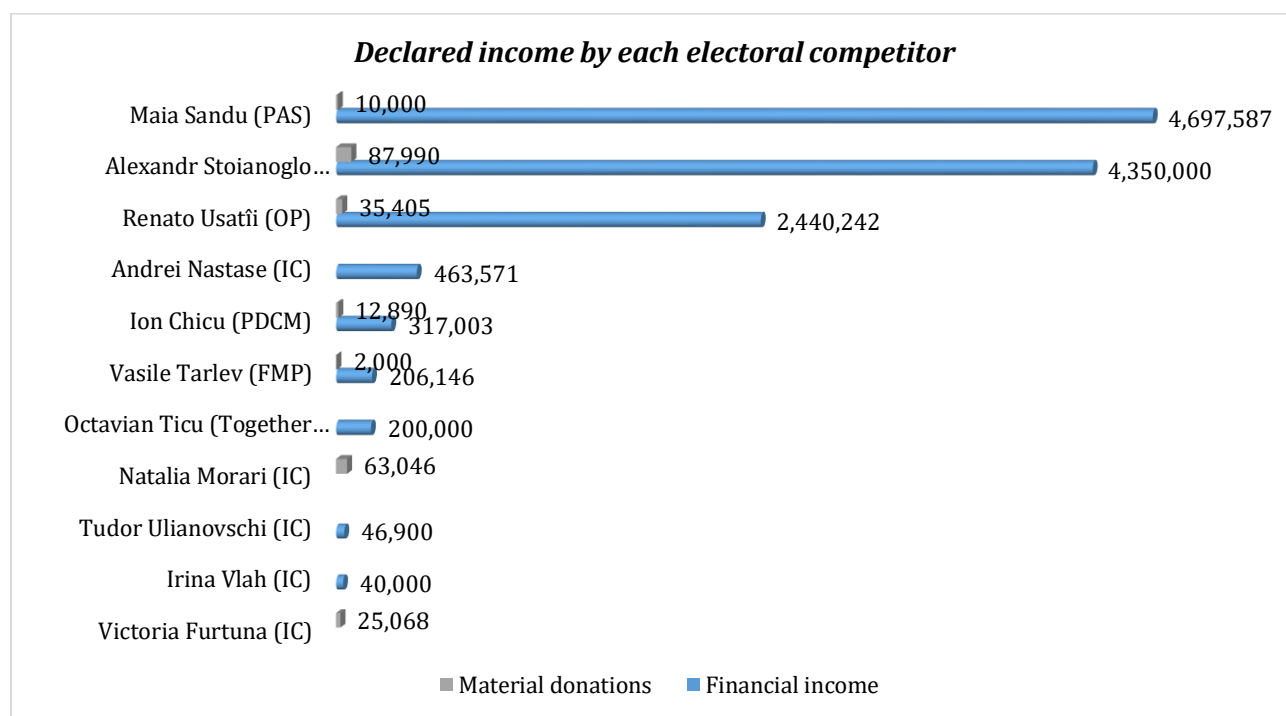
6.2.1. Reported income and sources

6.2.1.1 Declared income in the context of presidential elections

For the period 20–30 September 2024, 11 electoral competitors reported total income of 12,997,847 lei, of which 236,399 lei came from material donations (2% of the total declared income).

The highest declared income were reported by Maia Sandu (PAS) – 36% of the total, followed by Alexandr Stoianoglo (PSRM) – 34%, and Renato Usatii (OP) – 19% (see Graph no. 3) Consequently, 89% of the total declared income were reported by three electoral competitors, while only 11% were reported by the remaining eight competitors.

Graph no. 3.



Depending on the source of income, the situation is as follows (see Graph no. 4):

- 75% (9.8 million lei) were financial transfers from the political parties' current accounts to the "Electoral Fund" account. Of these, 30% came from state budget allocations [Alexandr Stoianoglo (PSRM), Maia Sandu (PAS), Renato Usatii (OP), Octavian Ticu (Together EB)], and

⁷⁸ Article 48¹, para. (5) [Contravention Code](#).

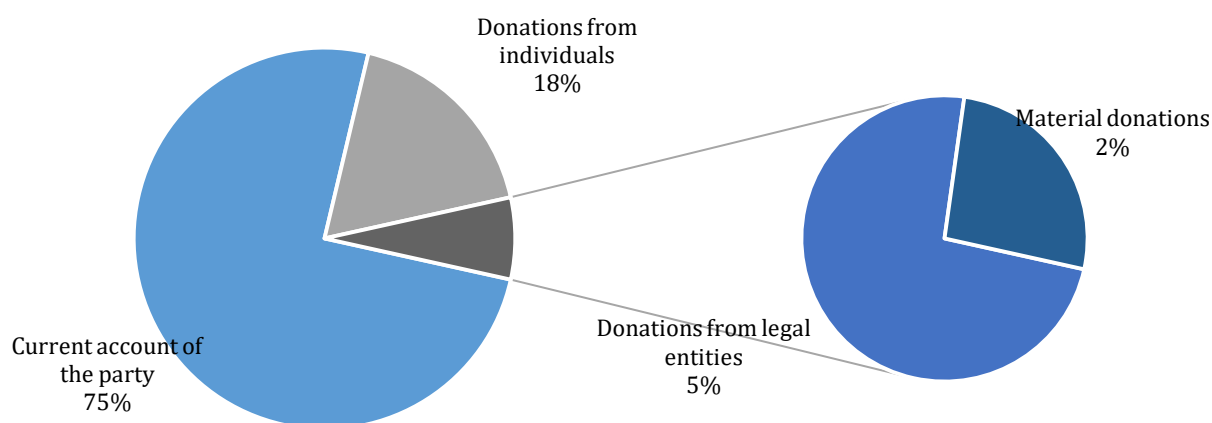
⁷⁹ Article 102 para. (2) of the Electoral [Code](#).

70% from private sources [Alexandr Stoianoglo (PSRM), Maia Sandu (PAS), Renato Usatii (OP), Ion Chicu (PDCM)];

- 18% (2.3 million lei) came from donations by individuals, collected by eight electoral competitors [Alexandr Stoianoglo (PSRM), Maia Sandu (PAS), Renato Usatii (OP), Vasile Tarlev (PVM), Irina Vlah (IC), Ion Chicu (PDCM), Andrei Nastase (IC), Tudor Ulianoschi (IC)];
- 5% (664,000 lei) came from financial donations by legal entities, collected by three electoral competitors [Maia Sandu (PAS), Renato Usatii (OP), Vasile Tarlev (FMP)];
- 2% (236 million lei) came from material donations, reported by seven electoral competitors [Alexandr Stoianoglo (PSRM), Maia Sandu (PAS), Renato Usatii (OP), Vasile Tarlev (PVM), Ion Chicu (PDCM), Victoria Furtuna (IC), and Natalia Morari(IC)].

Graph no. 4.

Sources of income declared by electoral competitors (20 - 30 September 2024)



Of the reported material donations, 89% were services, 5% were goods, and 3% each were properties and objects.

6.2.1.2 Declared income in the context of constitutional referendum

For the period of 20–30 September 2024 (as of 2 October 2024), only PAS declared income collected for the constitutional referendum campaign, totalling 1,377,300 lei, of which 10,000 came from material donations. Of the financial income, 55% came from state budget allocations, 35% from donations by individuals, and 10% from donations by legal entities.

6.2.2. Declared expenses and their destination

6.2.2.1 Declared expenses in the context of presidential elections

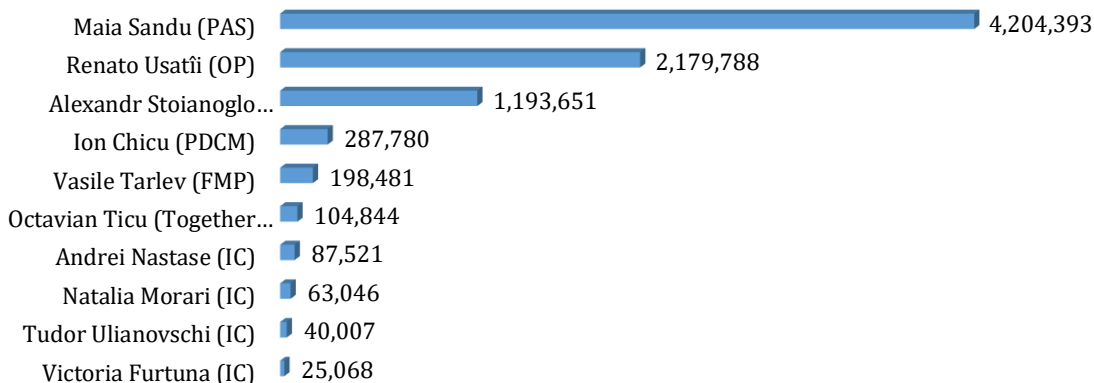
According to CEC's official website, for the period of 20–30 September 2024, 10⁸⁰ electoral competitors declared total expenses of 8,384,579 lei, of which 236,399 lei came from material donations. The highest declared income was from Maia Sandu (PAS) – 50% of the total reported expenses, followed by Renato Usatii (OP) - 26% and Alexandr Stoianoglo (PSRM) – 14% (see Graph

⁸⁰Irina Vlah (IC) did not declare any expenses.

no. 5). Consequently, as with the income, 90% of the total declared expenses belonged to three electoral competitors, and only 10% - to the remaining seven competitors.

Graph no. 5.

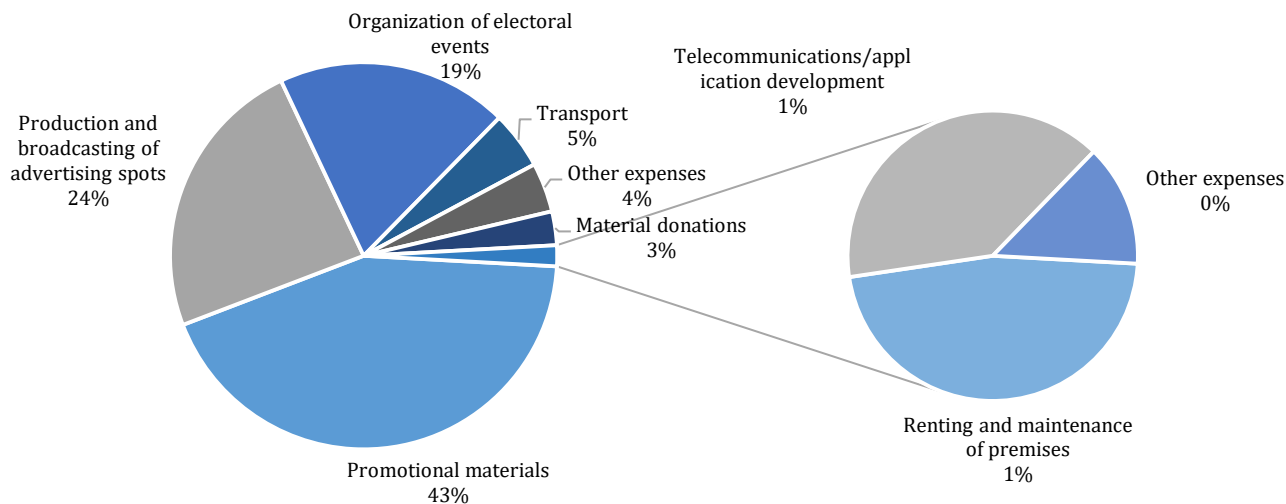
Expenses declared by electoral competitors (20 - 30 September 2024)



Regarding the destination of the reported financial expenses, most – 43% – were for promotional materials, followed by expenses for the production and broadcasting of advertising spots – 24%, and for organizing electoral events – 19% (see Graph no. 6).

Graph no. 6.

Destination of expenses declared by electoral competitors (20 - 30 September 2024)



6.2.2.2 Declared expenses in the context of constitutional referendum

Between 20 and 30 September 2024, only PAS declared campaign expenses for the constitutional referendum, amounting to 1,241,966 lei. Most expenses were for promotional materials – 65%, followed by the production and broadcasting of advertising spots – 17%, and for organizing electoral events – 11%.

6.3. Civic monitoring of electoral campaign financing

Based on reports completed by Promo-LEX observers, estimates were made of the expenses incurred by electoral competitors during 20 - 30 September 2024. These estimated expenses were compared to the expenses declared to CEC in the reports on campaign financing. The minimum market prices identified for the services, goods, and works used for electoral campaigning were applied as methodological benchmarks for estimating expenses. It should be noted that these prices were uniformly applied to all electoral competitors and referendum participants.

Note that some discrepancies may exist between the costs applied by Promo-LEX and those reported by electoral competitors (both for financial expenses and material donations).

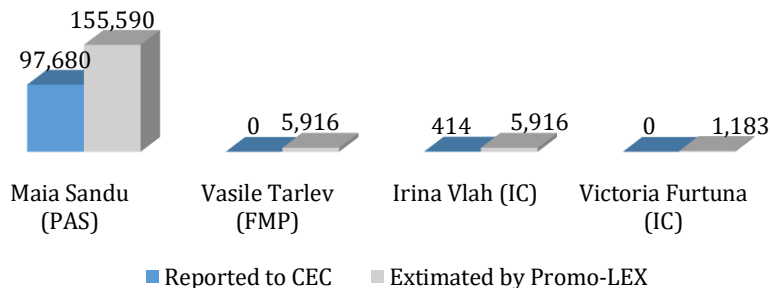
6.3.1. Estimation of expenses for rewards to volunteers/agitators

During the monitoring period, Promo-LEX observers reported activities involving agitators. Expenses were estimated based on the minimum national salary⁸¹, applying the rate of 29.58 lei/hour (236.64 lei/day, 5,000 lei/month).

Presidential election. As for the four electoral competitors, unreported expenses were estimated at a minimum of 70,511 lei (see Graph no. 7).

Graph no. 7.

Estimation of expenses for rewards to agitators/volunteers in the presidential elections

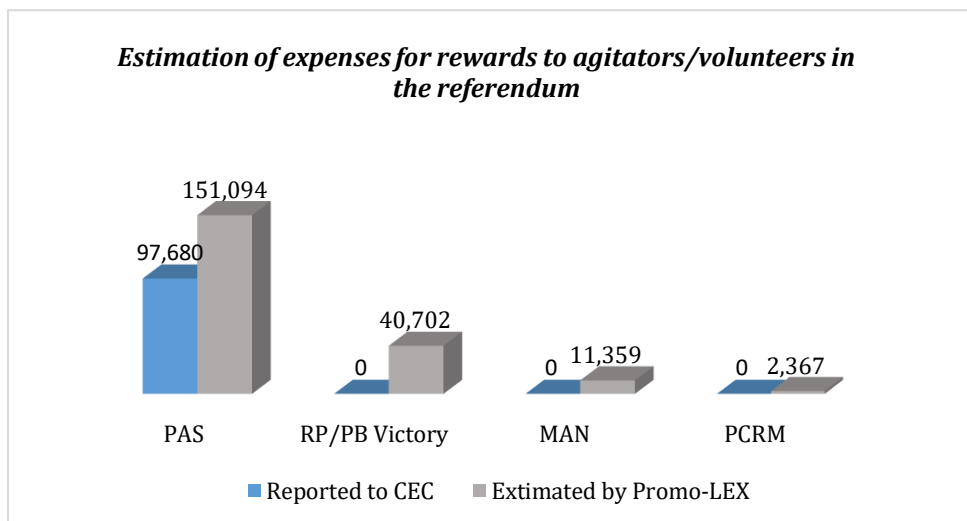


The highest unreported expenses for volunteer/agitator rewards were observed in the case of Maia Sandu (PAS) – 57,910 lei, followed by Vasile Tarlev (FMP) – 5,916 lei, and Irina Vlah (IC) – 5,502 lei.

Constitutional referendum. Similarly, for four participants in the constitutional referendum, unreported expenses of at least **107,842 lei** were estimated. The most significant unreported expenses were noted for PAS – 53,414 lei and RP/PB Victory– 40,702 lei (see Graph no. 8).

⁸¹ Government [Decision](#) No. 985 of 6 December 2023, regarding the establishment of the minimum national salary for 2024.

Graph no. 8.

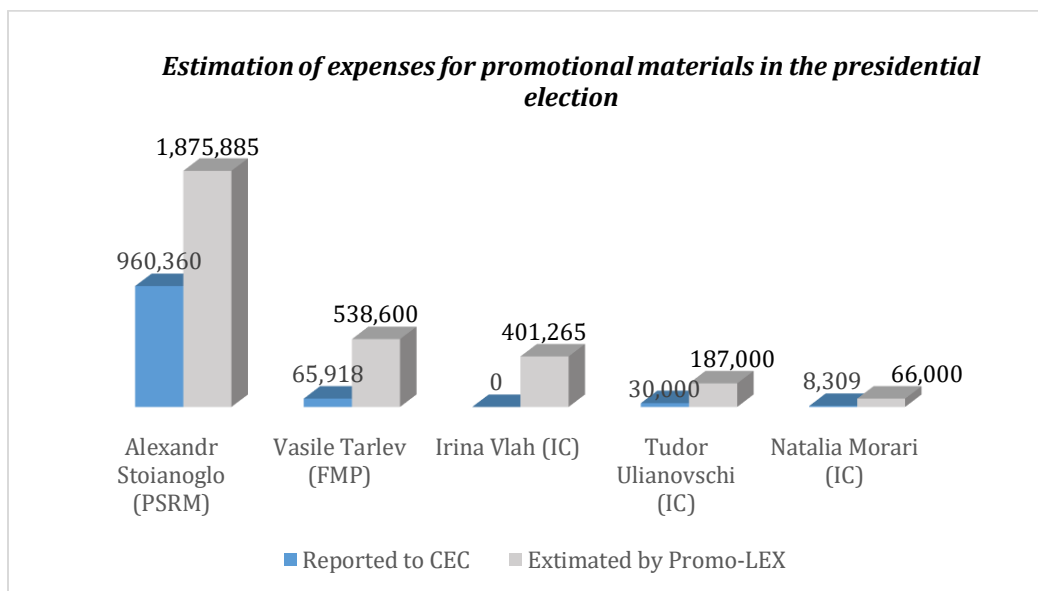


6.3.2. Estimation of expenses for promotional materials

According to Promo-LEX observers, electoral competitors used promotional materials (flyers, banners, video spots, visibility materials, etc.).

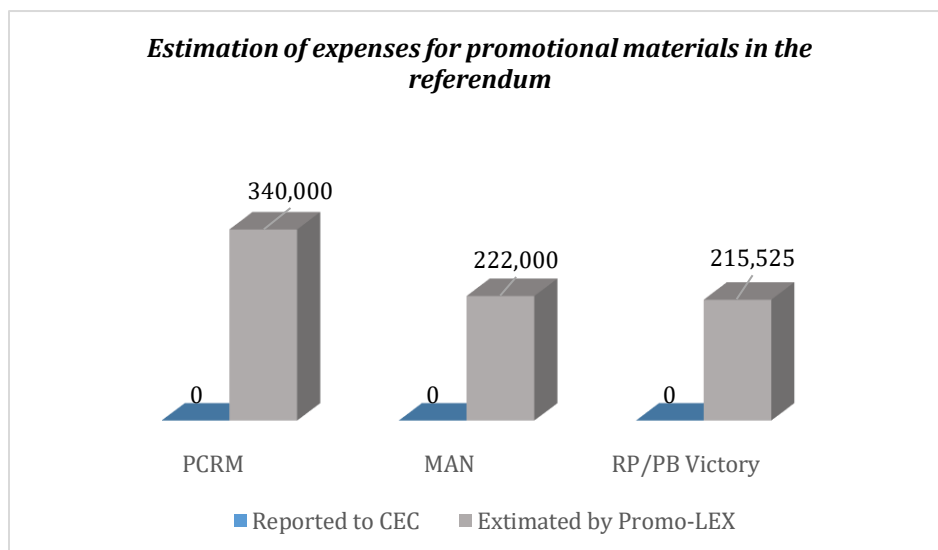
Presidential election. Based on observed data, unreported expenses were estimated for five electoral competitors, amounting to at least **2,004,163 lei**. The highest estimated unreported expenses for promotional materials were for Alexandr Stoianoglo (PSRM) – 915,525 lei, Vasile Tarlev (FMP) – 472,682 lei, Irina Vlah (IC) – 401,265 lei, Tudor Ulianoschi (IC) – 157,000 lei, and Natalia Morari (IC) – 57,690 lei (see Graph no. 9).

Graph no. 9.



Constitutional referendum. After monitoring the campaign, unreported expenses were estimated for three participants in the referendum, amounting to at least 777,525 lei: PCRМ – 340,000 lei, MAN – 222,000 lei, and RP/PB Victory – 215,525 lei (see Graph no. 10).

Graph no. 10.



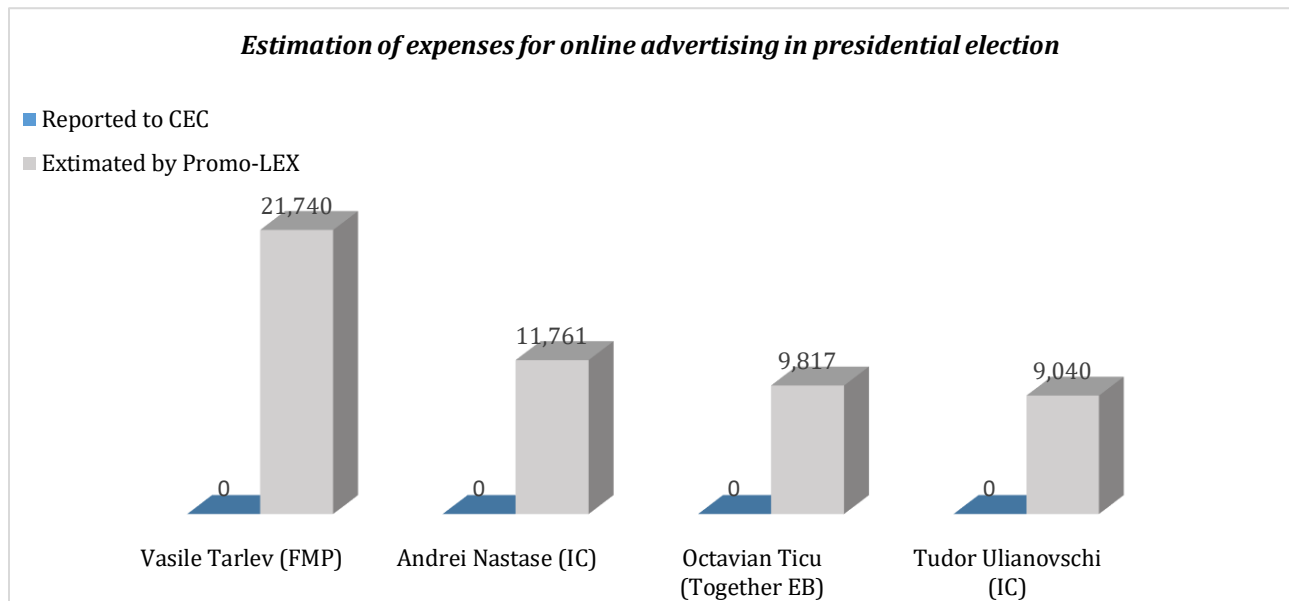
Regarding the estimated expenses for promotional materials, it was observed that RP/PB Victory distributed anti-EU flyers without any print data across all regions of the country. Due to this, it was impossible to estimate the costs of these materials, suggesting that the unreported expenses should be much higher than those listed in the report.

6.3.3. Estimation of expenses for online advertising

During the monitored period, online advertising was observed through live broadcasts of various events organized for promotional purposes⁸².

Presidential election. Unreported expenses of at least **52,358 lei** were estimated for four electoral competitors, as follows: Vasile Tarlev (FMP)) – 21,740 lei, Andrei Nastase (IC) – 11,761 lei, Octavian Ticu (Together EB) – 9,817 lei, and Tudor Ulianoschi (IC) – 9,040 lei (see Graph no. 11).

⁸²It was noted that the expenses for Google Ads could not be estimated, so these costs were excluded from the declared sums.



Constitutional referendum. Unreported expenses were estimated for two participants in the referendum, amounting to at least 27,337 lei, specifically: PAS – 16,451 lei and RP/PB Victory – 10,886 lei.

6.3.4. Estimation of expenses for advertising on social networks

Presidential election. Sponsored social media advertising was widely used during the electoral campaign. Based on public reports accessible on Meta, unreported expenses of **6,473 lei** were estimated for the electoral competitor Natalia Morari (IC).

Constitutional referendum. Similarly, for two participants in the constitutional referendum, unreported expenses were estimated at no less than **265,017 lei**, specifically RP/PB Victory – 245,944 lei and PAS – 19,073 lei.

In the context of the electoral campaign regarding the constitutional referendum, other subjects, aside from the registered participants, were observed making expenses for advertising on social media, estimated at least 36,167 lei: Voice of Moldova – 11,689 lei and Citizens for Europe – 21,986 lei. These entities sponsored advertising in support of the constitutional referendum. Anti-government and anti-PAS messages were also observed, with at least 84,815 lei in unreported expenses incurred by Veaceslav Platon.

Considering the points mentioned above, we reiterate Promo-LEX's opinion regarding the necessity of regulating political and electoral financing by third parties.⁸³

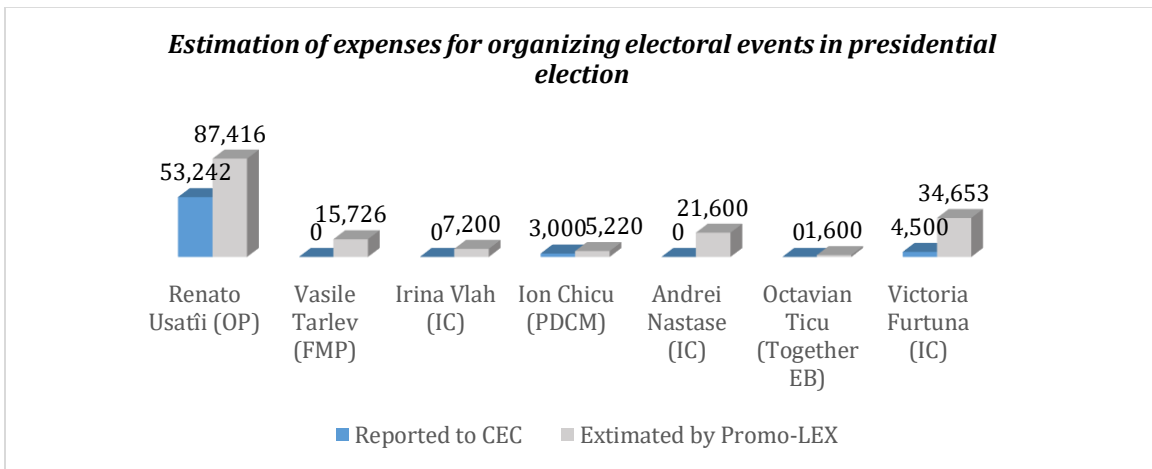
⁸³ [Political and electoral financing](#) by "third parties" is a means of circumventing the provisions of the legal framework concerning political and electoral financing in the Republic of Moldova.

6.3.5. Estimation of expenses for organizing electoral events

During the monitoring period, Promo-LEX observers reported on the organization of electoral meetings, the distribution of electoral materials, etc.

Presidential election. Based on the information collected by Promo-LEX observers, unreported expenses of at least **112,672 lei** were estimated for seven electoral competitors. The highest unreported expenses were for Renato Usatii (OP) – 34,173 lei, Victoria Furtuna (IC) – 30,153 lei, and Andrei Nastase (IC) – 21,600 lei (see Graph no. 12).

Graph no. 12.



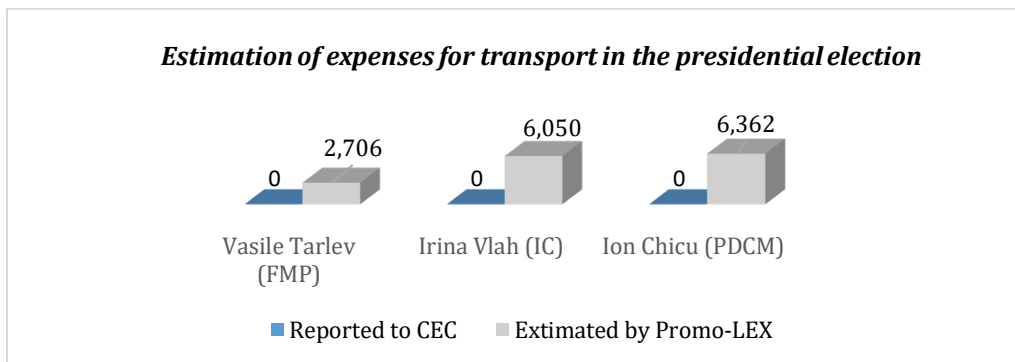
Constitutional referendum. Unreported expenses were estimated for two participants in the referendum, amounting to at least **149,497 lei**, specifically: RP/PB Victory – 146,497 lei and PCRM – 3,000 lei.

6.3.6. Estimation of expenses for fuel and transportation

During the monitored period, Promo-LEX observers reported that electoral competitors engaged in activities involving travel across Moldova, leading to transportation expenses.

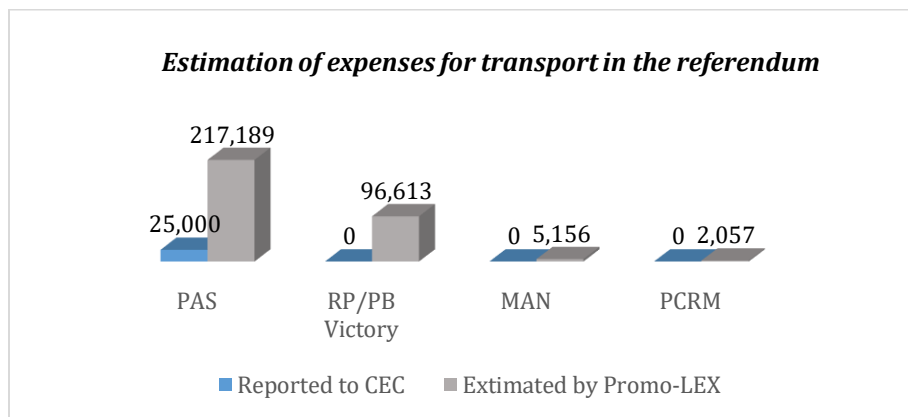
Presidential election. Based on this information, unreported expenses of at least **15,118 lei** were estimated for three electoral competitors (see Graph no. 13).

Graph no. 13.



Constitutional referendum. Unreported expenses for transport of at least **296,015 lei** were estimated for four electoral competitors. The highest expenses were for PAS – 192,189 lei and RP/PB Victory – 96,613 lei (see Graph no. 14).

Graph no. 14.



6.3.7. Estimation of expenses for travel abroad

According to Promo-LEX observers, electoral competitors also travelled abroad. In the case of **presidential elections**, unreported expenses for travel were estimated at least **20,655 lei** for two electoral competitors, namely Maia Sandu (PAS) – 19,319 lei and Ion Chicu (PDCM) – 1,335 lei.

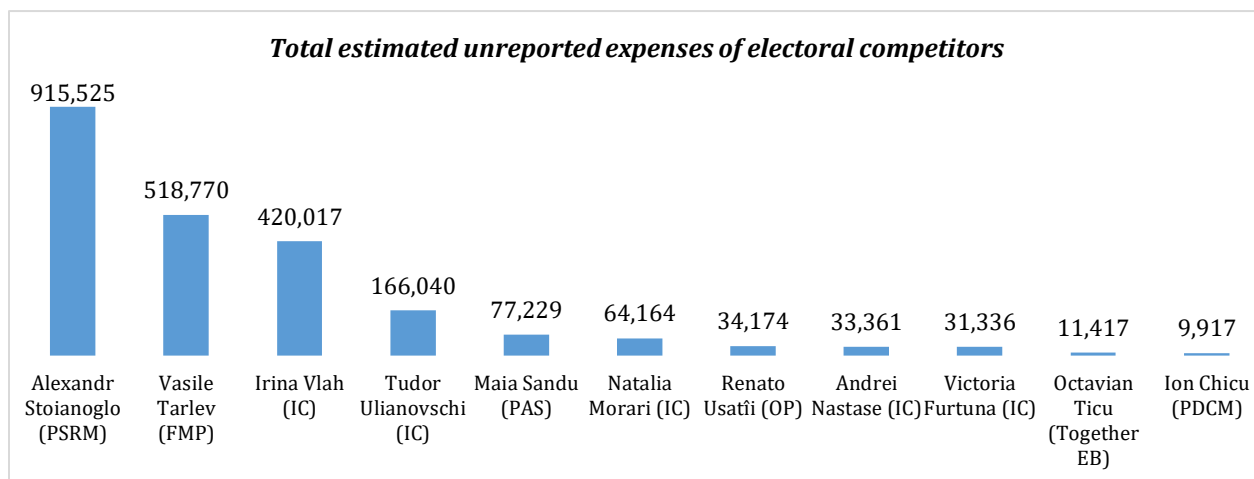
Within the campaign regarding the **constitutional referendum**, unreported estimated expenses were observed for one participant, PAS, amounting to at least **19,319 lei**.

6.3.8. Conclusions on the civic monitoring of the electoral campaign

Presidential election. For the campaign activities carried out by 11 electoral competitors, Promo-LEX estimated unreported expenses totalling at least **2,281,950 lei**.

The highest unreported expenses were for Alexandr Stoianoglo (PSRM) – 40% of the total estimated expenses, followed by Vasile Tarlev (FMP) – 23%, and Irina Vlah (Independent Candidate) – 18% of the expenses (see Graph no. 15).

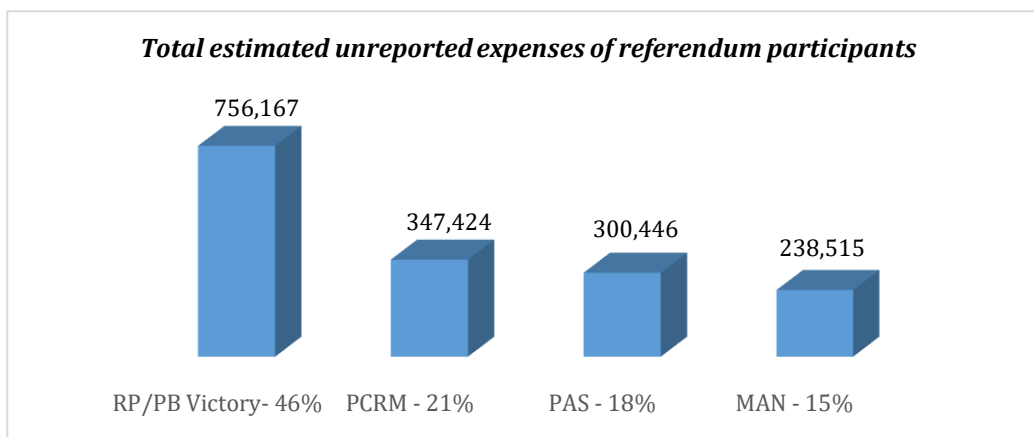
Graph no. 15.



Based on the destination of estimated unreported expenses, the majority were for promotional materials—88%, followed by event organization—5%, rewards for volunteers/agitators—3%, Internet—2%, and transportation and travel abroad—1%.

Constitutional referendum. For the campaign activities conducted by four referendum participants (RP/PB Victory, PCR, PAS, and MAN), Promo-LEX estimated unreported expenses amounting to at least **1,642,552 lei** (see Graph no. 16).

Graph no. 16.



Based on the destination of the expenses, the majority were estimated for promotional materials—47%, transportation—18%, social media advertising—16%, followed by event organization—9%, rewards for volunteers/agitators—7%, online advertising—2%, and travel abroad—1%. In the case of RP/PB Victory, expenses would have been higher, considering that informative materials without identifiable print data were distributed nationwide, making cost estimation impossible. Due to this, it was impossible to estimate the costs of these materials. We also note that the events organized are not public, making it very difficult to obtain information regarding the actual expenses.

VII. HATE SPEECH AND INCITEMENT TO DISCRIMINATION

Between 9 and 22 September, at least 14 cases of hate speech and other forms of intolerance were identified. Of these 14 cases, eight occurred in a political context, and six were in an electoral context. "Political affiliation," "professional activity," and "health" were the main criteria behind the hate speech cases identified during this period. The six cases were viewed over 134,000 times and shared 368 times.

Furthermore, in the online space, some politicians, members/sympathizers of political parties are associated with mental or psychological illnesses, indirectly promoting stereotypes against individuals suffering from such conditions. During the reference period, cases of sexist language, as well as homophobic or xenophobic messages, were identified. Although these messages did not incite hatred, discrimination, or violence, they contribute negatively, on one hand, to the promotion of stereotypes and prejudices against vulnerable groups, and on the other hand, to fuelling social fears.

For example, Igor Dodon, the president of PSRM and former president of the Republic of Moldova (2016 - 2020), delivered a speech in which he used derogatory language based on prejudice against LGBT activists, defenders of LGBTQI+ rights in Moldova, and promoted biases against LGBTQI+ individuals.

*"I have the summons; I can publish it to make sure there will be criminal and administrative proceedings, from those who consider themselves the biggest ones, I would rather say big***... We have such people in the Republic of Moldova. Let them sue me again; no problem. But what happens next, pay very close attention. They call me to the police, and I ask them: "What do you want from me?" "Well, someone complained that you called them names. You called them that and that, saying that the majority of the population...,but there is no study to prove that the majority of the population is against us,' these fellas or chicks, whatever they are, say. What you are is your business at home, but don't bring it out into the street and don't try to put that in schools and kindergartens."*⁸⁴

In the context of presidential elections, as well as the constitutional referendum, several false messages were identified in the public space that, although aimed at influencing electoral choices, directly target LGBTQI+ individuals, portraying them as a danger to traditional society. For instance, claims about sexual identity tests in schools, the introduction of an LGBT quota in state institutions, etc. These messages are part of antagonistic discourses from various political actors who either organize electoral agitation against Moldova's accession to the European Union or support certain candidates for the presidency of the Republic of Moldova. In the public space of the Republic of Moldova, these messages have a continuous presence, being used in all electoral campaigns over the past eight years.

For example, in a material disseminated in the public space, but which does not contain information about the print run and sponsor, reference is made to the "traditional values" of the member states of the Eurasian Economic Union and the "non-traditional values" of the European Union, such as: "gay parades and 'pride month' are mandatory for Moldova to be a member of the «European family'» vs. "no one forbids or penalizes an unconventional personal life if it is not public" (see *Annex no. 3*). Given the data of the Social Distancing Index developed by the Partnership for Development Center⁸⁵, which shows that 65% of the population would not be ready to accept LGBTQI+ individuals as colleagues or neighbors, such messages contribute to creating a hostile environment for these individuals.

⁸⁴Igor Dodon, [Online Show](#) "Live with Igor Dodon," 13 September 2024, min. 13:52, last accessed: 25 September 2024.

⁸⁵Partnership for Development Center, [Social Distancing Index](#), 2024, p. 6, last accessed: 25 September 2024.

A case of sexist language was identified in the public discourse of Alexei Lungu, president of "Chance" party and journalist. He stated during the КОНТЕКСТ show:

"Хотя, что они кричали, Майя Санду? «Freedom», low gas prices, etc. Who is in power today? Какой-то карлик, какая-то баба яга маленькая, которая имеет очень много... я не знаю, как сказать по-русски «frustrări», ну, внутренних неудовольствиях. И которое всё это... то есть, ставит на народ. Они издеваются на сегодняшний день."⁸⁶

The association with Baba Yaga and physical appearance in discussions about Maia Sandu's professional activity represents a form of ridicule and minimization of her professional abilities. Indirectly, such messages promote gender stereotypes in political and social life.

⁸⁶ Alexei Lungu, [КОНТЕКСТ Show](#), Găgăuzia24, YouTube, min. 21:51, last accessed: 25 September 2024.

RECOMMENDATIONS

To the Parliament of the Republic of Moldova:

1. Regulating circumstances in which unregistered participants in the election can engage in electoral campaigning.
2. Amending the Electoral Code to include non-political actors in the list of subjects eligible to register as referendum participants.
3. Regulation of grounds for invalidating signatures in the case of collecting electronic signatures

To the Central Electoral Commission:

4. Reviewing the form of subscription lists, specifically the number and content of the fields that need to be completed by supporters in order to simplify the information registration process.
5. Promoting the use of "Electronic Subscription List" Information Subsystem (ESL IS) as an alternative method for collecting supporters' signatures.
6. Digitalizing the procedure for declaring a new place of residence so that voters can personally update their information regarding their temporary residence.
7. Publishing detailed and complete information regarding the organization and conduct of elections.
8. Organizing and conducting with the Bureau for Reintegration Policies of an information and electoral education campaign for voters on the left bank of the Dniester.

To the local public authorities

9. Ensuring lower electoral bodies have all the necessary conditions for effective operation.

To representatives of religious denominations

10. Refraining from conducting electoral campaigning activities for certain electoral competitors or for one of the referendum options.

ABBREVIATIONS

para. – paragraph

HOME – National Reunification Party Home

ALDE – Alliance of Liberals and Democrats for Europe

LPA – local public administration

PSA – Public Services Agency

art. – Article

AUR – Alliance for the Union of Romanians

EB – electoral bloc

PEB – precinct electoral bureau

PB – political bloc

CEC - Central Electoral Commission

DEC – second-level district electoral council

IC – independent candidate

CUB – Coalition for Unity and Welfare

ENEMO – European Network of Election Monitoring Organizations

let. – letter

PI – Police Inspectorate

SL – subscription lists

MAN – National Alternative Movement

MFA – Ministry of Foreign Affairs

OM – Observation Mission

RMM – Respect Moldova Movement

NDI – National Democratic Institute

NOI - NOI Political Party

no. - number

OSCE/ODIHR – OSCE Office for Democratic Institutions and Human Rights

LTO – long-term observer

STO – short-term observer

PACE – Building Europe at Home Party

PAS – Action and Solidarity Party

PCRM – Party of Communists of the Republic of Moldova

PDCM – Party of Development and Consolidation of Moldova

OP – Our Party

FMP – Future of Moldova Party

VPP – Victory Political Party

RP – Revival Party

ESDP – European Social Democratic Party

PSRM – Party of Socialists of the Republic of Moldova

ChP – Chance Party

EGP – Ecologist Green Party

pt. – point

d. – district

REO – Register of Electoral Officials

SRV – State Register of Voters

SIS – Security and Intelligence Service

PS – polling station

ESL IS – "Electronic Subscription List" Information Subsystem

ATU – administrative-territorial unit

EU – European Union

USAID – United States Agency for International Development

ANNEXES

Annex no. 1. Accreditation/confirmation of persons authorized to participate in the electoral process

Table no. 1.1. Observers accredited by CEC⁸⁷ and DEC II

National observers				Total
Promo-LEX Association	1,059	Association for Participatory Democracy "ADEPT"	4	1,071
Public Association ADOR ORAȘUL MEU [I Love My City]	5	Public Association Bastina - Nimoreni	3	
International observers and experts				
Embassy of the Republic of Lithuania	6	Central Electoral Commission of the Republic of Lithuania	2	178
Embassy of the Republic of Slovakia	1	Central Electoral Commission of the Republic of Latvia	1	
Embassy of the Republic of Latvia	3	Central Electoral Commission of the Republic of Georgia	2	
Embassy of the Republic of Austria	2	Central Electoral Commission of the Republic of Azerbaijan	2	
Embassy of the Republic of Turkey	6	Central Electoral Commission of the Republic of Armenia	2	
Embassy of the Kingdom of Belgium	1	Central Electoral Commission of Ukraine	2	
Embassy of Canada	1	Central Electoral Commission of the Republic of Kazakhstan	1	
Embassy of the Kingdom of Sweden	6	Permanent Electoral Authority of Romania	1	
Embassy of the Netherlands	8	Supreme Election Council of the Republic of Turkey	2	
National Democratic Institute for International Affairs	15	National Electoral Committee of the Republic of Estonia	2	
European Network of Election Monitoring Organizations (ENEMO)	15	National Electoral Institute of the United Mexican States	2	
International Institute for Democracy and Electoral Assistance	3	International Republican Institute Washington	20	
European Platform for Democratic Elections	15	Parliamentary Assembly of the Black Sea Economic Cooperation	3	
Pro Democracy Association Targu Neamt Club	1	OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR)	38	
International Foundation for Electoral Systems (IFES)	15			

Table no. 1.2. Journalists confirmed by CEC⁸⁸ and DEC II

Private Institution "Radio Orhei"	1	Independent Periodical Publication "Observatorul de Nord"	8
Independent Periodical Publication "Ecoul Nostru" SRL	6	„CLOUD MEDIA” SRL	4
Press Agency "INFO-PRIM NEO" SRL	2	Bright Communications SRL	14
„Filiala Societății Române de Televiziune” SRL	8	Total	43

⁸⁷ **Accreditation of observers.**

⁸⁸ **Confirmation** of journalists.

Table no. 1.3. Authorization to conduct opinion polls and exit polls.⁸⁹

Authorization to conduct opinion polls	13
"INTELLECT GROUP" SRL	1
"DATE INTELIGENTE" SRL	3
"MLD MEDIA" SRL	4
Mixed Enterprise "C.B.S.-RESEARCH" SRL	2
Public Association "Aripi de viață"	1
Public Association "Institute for European Policies and Reforms"	1
"SIMPALS" S.R.L.	1
Authorization to publish opinion polls	1
Public Association "Institute for European Policies and Reforms"	1

Table no. 1.4. Approval of public interest messages⁹⁰

Diaspora Relations Bureau	2 video spots
Bright Communications (Realitatea TV Media Group)	3 motivational video spots
Public Association "Comunitatea Plus"	1 information leaflet
Central Electoral Commission	6 video spots 2 information leaflets 1 information poster 1 brochure 1 information material
Council of Europe Office in Chisinau	1 information video spot
Promo-LEX Association	2 motivational video spots
Public Association "Citizens for Europe"	1 video spot
National Agency for Development of Youth Programmes and Activities	3 motivational video spots
Total	24

⁸⁹ [Authorization](#) to conduct opinion polls and exit polls.

⁹⁰ [Approval](#) of public interest messages.

Annex no. 2. Number of invalid signatures collected from supporters of candidates for President


No.	Types of mistakes	Alexandr Stoianoglo	Maia Sandu	Renato Usatii	Vasile Tarlev	Irina Vlah	Ion Chicu	Andrei Nastase	Octavian Ticu	Victoria Furtuna	Tudor Ulianovschi	Natalia Morari	Igor Munteanu	Total
1.	Registered their personal data but did not sign.	38	14	9	7	9	2	7	5	3	5	11	3	113
2.	Do not have the right to vote on the date of signing on the subscription list	3	7	0	1	2	4	10	12	8	2	6	29	84
3.	Incorrectly registered the details from their identification document	555	502	679	1015	1095	645	1622	1174	1943	1578	1997	1255	14060
4.	Registered in a district other than the one where the signatures were collected	388	349	482	518	557	485	763	608	1121	688	821	588	7368
5.	Registered incorrect identification details on the SL, which do not allow for the identification of the supporter	675	438	582	991	1184	764	1112	966	2735	1154	1686	905	13192
6.	Registered and signed on the SL two or more times in support of the same candidate	47	28	167	94	87	48	91	73	1155	106	147	87	2130
7.	According to SRV data, have the status of deceased	5	4	0	15	14	7	15	14	51	22	26	20	193

Annex no. 3. Information material (no identification data)

**UE NE-A ADUS LGBT
ЕС УЖЕ ПРИВЕЛ К НАМ ЛГБТ**

IMPOTRIVA UE!

- X** **VOR OBLIGA INTRODUCEREA ORELOR DE EDUCAȚIE SEXUALĂ ÎN ȘCOLI**
ЗАСТАВЯТ ВВЕСТИ УРОКИ СЕКСУАЛЬНОГО ОБРАЗОВАНИЯ В ШКОЛАХ
- X** **PENTRU A SPUNE „BĂIAT” SAU „FĂȚĂ”, COPILII VOR TREBUI SĂ TREACĂ TESTE PRIVIND IDENTITATEA SEXUALĂ**
ЧТОБЫ СКАЗАТЬ «МАЛЬЧИК» ИЛИ «ДЕВОЧКА», ДЕТИ ДОЛЖНЫ ПРОЙТИ ТЕСТЫ НА СЕКСУАЛЬНУЮ ИДЕНТИЧНОСТЬ
- X** **PARADELE GAY ȘI „LUNA MĂNDRIEI” SUNT OBLIGATORII PENTRU CA MOLDOVA SĂ FIE MEMBRĂ A „FAMILIEI EUROPENE”**
ГЕЙ-ПАРАДЫ, «МЕСЯЦ ГОРДОСТИ» ОБЯЗАТЕЛЬНЫ, ЧТОБЫ МОЛДОВА БЫЛА ЧЛЕНОМ «ЕВРОПЕЙСКОЙ СЕМЬИ»
- X** **CĂSĂTORIILE ÎNTRE PERSOANE DE ACELAȘI SEX SUNT DOAR O CHESTIUNE DE TIMP. TOATE ȚĂRILE UE CEDEAZĂ SUB PRESIUNE.**
ОДНОПОЛЫЕ БРАКИ — ДЕЛО ВРЕМЕНИ. ВСЕ СТРАНЫ ЕС СДАЮТСЯ ПОД ДАВЛЕНИЕМ



**ȚĂRILE UNIUNII ECONOMICE EUROASIATICE
RESPECTĂ VALORILE TRADIȚIONALE**

**В ЕВРАЗИЙСКОМ ЭКОНОМИЧЕСКОМ
СОЮЗЕ УВАЖАЮТ ТРАДИЦИОННЫЕ
ЦЕННОСТИ**

IMPOTRIVA UE!

- ✓** **EDUCAȚIE LAICĂ, FĂRĂ PERVERSIUNI, PENTRU COPII**
СВЕТСКОЕ ОБРАЗОВАНИЕ ДЛЯ ДЕТЕЙ БЕЗ ИЗВРАЩЕНИЙ
- ✓** **CĂSĂTORIA ÎNTRE BĂRBAT ȘI FEMEIE ESTE STIPULATĂ ÎN CONSTITUȚIA MULTOR ȚĂRI ALE ȚĂRILE UNIUNII ECONOMICE EUROASIATICE**
БРАК МЕЖДУ МУЖЧИНОЙ И ЖЕНЩИНОЙ ПРОПИСАН В КОНСТИТУЦИИ МНОГИХ СТРАН ЕВРАЗИЙСКОГО ЭКОНОМИЧЕСКОГО СОЮЗА
- ✓** **LEGI PRIVIND INTERZICEREA PROMOVĂRII LGBT ÎN RÂNDUL COPILOR**
ЗАКОНЫ О ЗАПРЕТЕ ЛГБТ-ПРОПАГАНДЫ СРЕДИ ДЕТЕЙ
- ✓** **NIMENI NU INTERZICE SAU NU SANȚIONEAZĂ O VIAȚĂ PERSONALĂ NECONVENȚIONALĂ DACĂ NU ESTE PUBLICĂ**
НИКТО НЕ ЗАПРЕЩАЕТ ИЛИ НЕ НАКАЗЫВАЕТ ЗА НЕСТАНДАРТНУЮ ЛИЧНУЮ ЖИЗНЬ, ЕСЛИ ОНА НЕ ПУБЛИЧНА
- ✓** **VALORI TRADIȚIONALE ȘI RESPECT PENTRU CREDINȚĂ**
ТРАДИЦИОННЫЕ ЦЕННОСТИ И УВАЖЕНИЕ К ВЕРЕ



ЕАЭС Евразийский экономический союз
Țările Uniunii Economice Euroasiatice