

REPORT NO. 2

OBSERVATION MISSION FOR THE PARLIAMENTARY ELECTIONS OF 28 SEPTEMBER 2025

OBSERVATION PERIOD: 22 JULY - 27 AUGUST, 2025



Promo-LEX Association

23/13 Mitropolit Petru Movila St.

Chisinau, Moldova

info@promolex.md

www.promolex.md

Promo-LEX

Advancing democracy and human rights

DISTRIBUTED FREE OF CHARGE

All rights reserved. The content of the report may be used and reproduced for non-profit purposes without the prior consent of the Promo-LEX Association provided that the source of information is indicated.



This report has been produced as part of the Observation Mission for the parliamentary elections of 28 September 2025, carried out by the Promo-LEX Association. The mission is financially supported by Sweden, the Government of the United Kingdom of Great Britain and Northern Ireland, the European Union, the French Embassy, and the Council of Europe.

The Observation Mission is carried out under the aegis of the Civic Coalition for Free and Fair Elections.

Responsibility for the opinions expressed in this report lies with the Promo-LEX Association, and they do not necessarily reflect the position of the donors. In case of discrepancies between the text in Romanian and its translation into another language, the Romanian version of the report will prevail.

CONTENTS

INTRODUCTION	7
I. SOCIAL AND POLITICAL CONTEXT	9
II. LEGAL FRAMEWORK.....	11
III. ELECTORAL BODIES AND PUBLIC ADMINISTRATION.....	15
IV. ELECTORAL COMPLAINTS AND DISPUTES.....	28
V.NOMINATION AND REGISTRATION OF ELECTORAL COMPETITORS	34
VI. PERFORMANCE OF POTENTIAL ELECTORAL COMPETITORS.....	39
VII. ELECTION AND CAMPAIGN FINANCING.....	45
VIII. HATE SPEECH AND INCITEMENT TO DISCRIMINATION.....	51
RECOMMENDATIONS.....	58
ABBREVIATIONS	59
ANNEXES	61

EXECUTIVE SUMMARY

Legal framework. During the observation period, the legal framework was marked by changes made by the CEC to the Regulation on the status of observers and the accreditation procedure. The new requirements imposed on international organizations and observers, such as to demonstrate technical, financial capabilities and experience in the field, are not clearly defined and may generate arbitrary interpretations, which contravenes the Electoral Code and the principles of legality and proportionality. Also, the expansion of the grounds for withdrawing accreditation by vague terms such as “hampering” and “jeopardizing” raises risks of disproportionate penalties.

The CEC also initiated amendments concerning the mobile ballot box and voters lists, justified by the need to increase transparency and efficiency, including through digitization. However, they were adopted too close to voting day, contrary to the principle of stability of electoral legislation.

According to Promo-LEX, the amendment of the regulatory framework only one month before voting day could affect the predictability and stability of the electoral legal framework.

Electoral bodies. During the reference period, the CEC met in a mixed format in 21 meetings and adopted 202 decisions on the organization and conduct of elections. Most of the decisions concerned the registration of competitors, the establishment and activity of hierarchically lower electoral bodies and the accreditation/confirmation of persons authorized to participate in the electoral process.

The process of accreditation of observers is intensifying. During the monitored period, 1,176 national observers and 76 international observers and experts were accredited. The Promo-LEX Association accredited 627 observers.

Most DEC's follow the schedule. Out of a total of 149 visits made during working hours, in 97% DEC's were open. At the same time, more than half (54%) of premises of DEC's are accessible / partially accessible for people with special needs, according to Promo-LEX observers.

In the context of the parliamentary elections of 28 September 2025, 2,274 polling stations were set up in due time, of which 12 PS's were organized for voters from the Transnistrian region, and 301 PS's were set up abroad, including 4 for postal voting. Compared to the 2024 presidential election, the number of polling stations established by the CEC for the Transnistrian region decreased (from 30 to 12), while the number of those organized abroad increased (from 234 to 301).

With regard to the increase in the number of polling stations by about 70 units compared to the 2024 ballots, the Promo-LEX OM, in principle, supports the efforts to make voting abroad accessible. However, we reiterate the position that the number of polling stations abroad will not be able to grow indefinitely, and other mechanisms for making voting abroad accessible (e.g. voting over two days) could be applied in the future.

In the case of the PS's open for the Transnistrian region, the Promo-LEX OM considers that, based only on the dynamics of participation in the last three ballots, the decrease of the number of PS's by about three times seems unjustified.

The work of Promo-LEX observers was obstructed by acts of intimidation against an observer by a political actor, but also by the refusal and delay of providing electoral information by the authorities (PSA, CEC).

Electoral complaints and disputes. During the reference period, at least six notifications and three complaints were filed with the CEC, and the courts examined at least six disputes. They concerned the distribution of leaflets, defamation of electoral competitors, electoral campaigning, discriminatory treatment when presenting signatures collecting lists. The Promo-LEX OM appreciates that the CEC has started to publish in the section dedicated to elections the notifications filed by interested persons, an initiative that responds to a previous recommendation of Promo-LEX.

Designation and registration of electoral competitors in the parliamentary elections. For the parliamentary elections, the lists of candidates were registered from 4 electoral blocs (Patriotic EB, Alternative EB, Together EB, BUN EB), 13 political parties (PAS, PPDA, CUB, ALDE, PPNM, PSDE, MRM, LOC, AUR, PAM, PL, UCSM, PN) and 4 independent candidates (Andrei Năstase, Olesea Stamate, Victoria Sanduța, Tatiana Crețu).

At the same time, the CEC rejected applications for registration from 8 political parties due to non-compliance with the procedure for nominating a sufficient number of candidates, limiting the activity of the party, non-compliance with the minimum quota of representation for both sexes, or non-compliance with the statutory provisions on the designation of the list of candidates. Also, the presentation of an insufficient number of signatures led to the refusal of registration of three independent candidates.

Activity of electoral competitors. During the observation period, at least 31 activities carried out by 8 electoral competitors were observed, the majority carried out by Olesea Stamate's IG (9), Victoria Sanduța (6), Dina Carpinschi (5).

Despite the fact that the electoral campaign had not yet started, during the monitored period Promo-LEX observers reported at least 2,339 activities with electoral implications, most of which were observed in the case of the Patriotic EB (57%), PAS (23%), and MRM (5%). Of the 2,339 activities, most (71%) were distribution of information materials (newspapers, leaflets, flyers, calendars, etc.), 19% were dissemination of street and online advertising, and 6% were meetings with voters.

Use of administrative resources and activities with the potential to corrupt voters. Promo-LEX observers reported at least 40 cases of misuse of administrative resources, of which 30 cases by PAS, 4 cases by the Patriotic EB, 2 cases by PSDE and LOC each, one case by MRM and PPDA each. Also, observers found five cases that can be qualified as activities with potential to corrupt voters – two cases by PPDA and one case each by Patriotic EB, Victory EB and PSDE.

Involvement of third parties in the electoral process. During the monitoring period, we observed activities with electoral implications carried out by at least six subjects that can be qualified as third parties: European Initiative [Inițiativa Europeană] (expenditure of at least MDL 24,399), and social media pages – Moldova Stat Liber [Moldova Free State] (expenditure of at least MDL 31,362); Opreți gruparea Hoție și Război [Stop the Theft and War Group] (MDL 82,922); Jose Perry (MDL 24,419); Esther Bush (MDL 12,111); Молдова Молдовенеск Молдовенеште [Moldova Moldovan Moldovan] (MDL 20,206); and moldovenii.md.

Observation of election and campaign financing. Of the 20 contenders for the status of independent candidates, none opened a "For the initiative group" bank account. The total income declared during the signature collection period amounted to MDL 214,501, reported by 7 contenders, most of which were declared by Andrei Năstase's IG – 80% and Olesea Stamate's IG – 13% of income. The ceiling of the funds that could be used was exceeded in the case of Andrei Năstase's IG by MDL 115,577, which led to the application of a warning to him and the obligation to transfer to the state budget the amount that exceeded the ceiling. The electoral authority also applied other sanctions to Olesea Stamate's IG and Alexandru Țvetarnîi, following the supervision and control of the financing carried out in the context of the collection of signatures.

By 27.08.2025, out of the 21 registered electoral competitors, only four did not have a treasurer confirmed. At the same time, half of the electoral competitors (10) confirmed the opening of the "Electoral Fund" account. In order to be able to transfer their own funds to the "Electoral Fund" account, five political parties submitted financial reports to the CEC with the income accumulated and expenses incurred before the beginning of the electoral period – PAS, PSDE, MRM, PCRM (member of the Patriotic EB) and MAN (member of the Alternative EB).

Hate speech. At least 233 cases of hate speech, incitement to discrimination, and other forms of intolerance were identified between 21 July and 19 August 2025. Of these, 162 cases took place in the context of the electoral period for the parliamentary elections of 28 September 2025 and amounted to more than 2,500,000 views.

Compared to the 2021 parliamentary elections, there has been a negative evolution of hate speech, as between 21 July and 19 August 2025 alone there were about 54% of all the cases identified between 11 May and 25 July 2021.

People between the ages of 35 and 50, male, generate, promote, and/or spread hate messages more often. The hate speech identified was based on different criteria, most often political affiliation (70 cases), professional activity (54 cases), health (47 cases), opinion (37 cases), sexual orientation and/or gender identity (35 cases), and sex and/or gender (35 cases). It was mainly directed against politicians, members/supporters of political parties and politically appointed public officials (128 cases), women (38 cases) and LGBT people (33 cases).

INTRODUCTION

Report no. 2 has been prepared and presented in the context of the launch of the Promo-LEX Observation Mission (OM) for the parliamentary elections of 28 September 2025. Overall, it covers the period from 22 July to 27 August 2025. The main findings and trends in the current report refer to the socio-political and legal context of the elections, the activity of electoral bodies and the activities with electoral impact of potential competitors, the financing of elections and of the electoral campaign. Also, some observations are presented regarding the trends of hate speech, which will be further monitored during these elections.

This report includes the results of observation of the electoral period from 22 July to 27 August 2025, which includes the period of collection of signatures by independent candidates as well as the nomination and registration of electoral competitors, the establishment of lower electoral bodies. The monitoring of hate speech and incitement to discrimination was conducted from 21 July to 19 August.

During the mission, Promo-LEX will present four interim elections observation reports and one final report. For the voting day, press releases will be prepared on the conduct of the ballot and the results of the rapid counting of votes.

The objectives of the Promo-LEX OM reports are: to inform society about the trends attested in the electoral process; to notify electoral bodies about the results of real-time observation of the quality of the procedures of organizing and conducting the elections; to hold the electoral actors accountable; to prevent possible violations of the electoral legislation.

The observation methodology applied by Promo-LEX is based on relevant international standards and involves observation of elections both in the long term (during the electoral period) and in the short term (on voting day). The observation reports are prepared by the core team of the Promo-LEX OM based on their own findings and on those reported by the long-term observers (LTOs) regarding the activities of all the actors involved in the process of organizing and conducting the elections: (potential) electoral competitors, public authorities, electoral bodies, political parties, as well as civil society. LTOs' findings are reported on the basis of thematic forms and are stored on the web platform www.data.promolex.md, secure system with limited access, managed by Promo-LEX. Promo-LEX observers collect and analyze information resulting from on-site observations during visits to the territory, from interviews and meetings with interlocutors, as well as from study of official documents. The activity of electoral competitors and third parties will also be monitored online.

The monitoring of campaign financing is an important component of the work of the Promo-LEX OM. It involves observing electoral competitors from the perspective of the funds collected and used for campaign activities. Promo-LEX will estimate the expenses made by electoral competitors by applying minimum market prices and will compare them with those declared by competitors to the CEC in order to assess the transparency and correctness of the financing of the electoral campaign. We admit that there may be some differences between the costs applied by Promo-LEX for estimates and the actual costs of electoral competitors, but the important thing is that these prices will be applied uniformly for all competitors. The Promo-LEX OM will also observe and analyze how the Central Electoral Commission will perform its role of control and supervision in the area of political financing.

Observation of electoral procedures will be carried out during the electoral period by 42 LTOs, including two LTOs who will be responsible for monitoring voting abroad. Promo-LEX will monitor hate speech and discrimination through eight monitors.

On voting day, the Promo-LEX OM will ensure the observation of voting by covering polling stations based on a representative sample made of 400 static short-term observers (STOs). Their effort will be supplemented by 400 STOs who will visit the rest of the polling stations being grouped into 200 mobile teams, two observers per team.

Promo-LEX will observe every polling station set up for voters in the Transnistrian region. About 100 polling stations opened abroad will also be covered with observers. In this regard, particular attention will be paid to the stations established for postal voting.

The work of observers is managed by the core team of the Mission. All Promo-LEX observers and monitors are trained in seminars organized by the Observation Mission. Observers also sign and

undertake to comply with the Code of Conduct¹ for Promo-LEX independent national observers, assuming the obligation to act operatively, in good faith, and in a nonpartisan manner.

The OM for the parliamentary elections of 28 September 2025 is a project carried out by Promo-LEX Association within the Civic Coalition for Free and Fair Elections (CALC).

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

The Promo-LEX Mission manages the web platform www.electorala.monitor.md, where anyone can report activities with electoral implications. Relevant information from observers' reports is stored on this platform, too. Citizens' reports can be checked by observers.

Promo-LEX is a public association that aims to develop democracy in 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 Moldova since 2009, this OM being the 30th. Employees and members of the Association also have international experience, participating in international election observation missions in Armenia, the 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. Each report ends with recommendations for public authorities, electoral bodies, electoral competitors, other stakeholders, in order to ensure proper organization and improvement of the electoral process.

This report is prepared with the financial support of Sweden, the Government of the United Kingdom of Great Britain and Northern Ireland, the European Union, the French Embassy, and the Council of Europe.

Responsibility for the opinions expressed in this report lies with the Promo-LEX Association, and they do not necessarily reflect the position of the donors. In case of discrepancies between the text in Romanian and its translation into another language, the Romanian version of the report will prevail.

¹ [Code of Conduct](#) for Promo-LEX independent national observers.

I. SOCIAL AND POLITICAL CONTEXT

During the observed electoral period, the socio-political situation was marked by several events with an impact on the security and integrity of the process of organizing and conducting the parliamentary elections of 28 September 2025. These actions seem to fit into the list of threats identified by Promo-LEX with reference to “the danger of external interference in the electoral processes of the Republic of Moldova” and “illegal campaign financing and electoral corruption”².

According to the Moldovan authorities responsible for security, the source of interference is the Russian Federation, which is involved in the electoral process through at least 10 interference instruments³, including:

- Electoral corruption and illegal financing from external sources;
- Information manipulation campaigns;
- Organization of paid protests;
- Cyber attacks on critical infrastructure;
- Instrumentalization of the church by involving paid clergy to manipulate public opinion.

Some of the events with a social-political impact during the electoral period took place through the involvement of Ilan Șor, former president of the Chance Party, declared unconstitutional, currently staying in the Russian Federation. The activation of the protest actions of the parties coordinated by Ilan Șor⁴, including through the promise to pay for participation in the protests⁵, occurred against the background of the sentencing of Evghenia Guțul (current governor of ATUG) and Svetlana Popan in the criminal case concerning the illegal financing of the Chance Party (2021-2023) by an organized criminal group⁶. The People’s Assembly of ATUG, through the position of the majority, also criticized the act of justice⁷. At the same time, messages of support for the two convicted in the cases of illegal financing also came from some officials of the Russian Federation⁸.

The police promptly intervened in the protests organized at the initiative of Ilan Șor, during which situations of physical assault of journalists took place⁹. In the context of the aforementioned criminal case, we shall draw attention that the judge who examined the case “was subjected to constant pressure and serious threats”¹⁰.

Opposition parties were divided over the conviction of Evghenia Guțul. Some supported it, noting that the conviction is important but “delayed”¹¹, others, on the contrary, condemned it¹².

The Russian Federation gets involved in the electoral processes in Moldova by promoting the idea of “election fraud through the diaspora”¹³. The national authorities rejected¹⁴ and condemned¹⁵ Russia’s interference and disinformation attacks on the vote cast abroad and on overall electoral processes.

Cyber attacks on critical infrastructure, according to the authorities, are another feature of the interference in the activity of government institutions during the electoral period. Thus, the Information Technology and Cyber Security Service (ITCSS) announced about a cyber security incident organized by

² [Report no. 1](#). Promo-LEX Observation Mission for the parliamentary elections of 28 September 2025. pp. 11-12.

³ [Press release](#). President Maia Sandu convened the meeting of the Supreme Security Council: “The analyses of institutions show 10 main instruments of interference in the political and electoral processes in Moldova.”

⁴ By coordinated parties we mean at least the components of the so-called Victory Bloc. For example, [Revival Party](#). Today we are supporting our colleagues Evghenia Guțul and Svetlana Popan.

⁵ [Șor openly called](#) for disobedience and promised to pay \$3,000 for “protests”.

⁶ [Pronouncement of the sentence](#) concerning illegal financing of an electoral competitor and a political party, 5 August 2025. Chisinau Court.

⁷ [Extraordinary meeting](#) of the People’s Assembly of Gagauzia. 6 August 2025.

⁸ [Maria Zakharova](#). The court sentenced the legitimate head of Gagauzia, Evghenia Guțul, to 7 years in prison.

⁹ [Declaration by the Independent Journalism Center](#). We demand to stop and counteract the illegal actions of “protesters” associated with Governor Evghenia Guțul directed against journalists.

¹⁰ The [Superior Council of Magistracy](#) defends the independence of justice in the face of a wave of intimidation.

¹¹ [The conviction of Evghenia Guțul](#) is seen as “a kind of debut for Moldovan justice.”

¹² [Igor Dodon](#), after the sentence received by the governor of Gagauzia: All that Maia Sandu’s justice could do is convict a woman, a mother, a leader elected by the people. We live in an autocratic state

¹³ [Moldova at a crossroads](#). Secretary of the Russian Security Council Sergei Shoigu

¹⁴ [The CEC rejects](#) disinformation campaigns and reaffirms the right of all citizens to vote freely.

¹⁵ [The MFA condemns](#) the interference of the Russian Federation and disinformation attacks against the Moldovan diaspora.

a foreign actor against the governmental infrastructure¹⁶. We shall remind that ITCSS hosts the State Automated Information System “Elections”¹⁷.

Also, the unique national service for emergency calls 112 informed about the reception of multiple fake calls initiated automatically by robotic systems and artificial intelligence, without direct human intervention, which affects the functionality of the service and can make it difficult to react to real situations¹⁸.

The detention of the former president of the Democratic Party of Moldova (PDM) Vladimir Plahotniuc by the Greek authorities and the decision to extradite him to Moldova¹⁹ also caused a wave of discussions in society and marked the activity of political parties during the registration of electoral competitors²⁰. In this context, we shall remind that according to investigative journalists, the former oligarch had a number of meetings with officials of the Russian Federation in the past year²¹.

The efforts of the Moldovan authorities to strengthen the European path and counter Russian interference are further supported by the European Union, including by the recent visit of three leaders of European states to Chisinau on Independence Day²². French President Emmanuel Macron, German Chancellor Friedrich Merz and Polish Prime Minister Donald Tusk responded to President Maia Sandu’s invitation. The visit did not result in the approval of any decisions, but was an act of support for Moldova’s European integration efforts, manifested in the run-up to the election campaign. Some opposition parties criticized the visit²³.

¹⁶ [Press release](#). Information Technology and Cyber Security Service.

¹⁷ [Report no. 1](#). Promo-LEX Observation Mission for the parliamentary elections of 28 September 2025. pp. 21.

¹⁸ [Fake calls](#) generated through 112 by robots and artificial intelligence.

¹⁹ [Vladimir Plahotniuc](#) to be extradited to Moldova: Last minute decision made in Greece.

²⁰ Following V. Plahotniuc’s [appeal](#) to his former supporters, the activity of the Modern Democratic Party of Moldova in preparation for the elections intensified, including by [joining](#) of members from other parties.

²¹ [The Insider](#). The Kremlin’s laundromat: Billionaire Moldovan fraudster Vladimir Plahotniuc repeatedly flew to Moscow for secret high-level talks.

²² [RFI. Moldova](#). Macron, Merz and Tusk: A European trio in Chisinau to support Moldova.

²³ “Comrade Macron, we won’t forget”: [Dodon criticizes](#) the visits of European leaders to Chisinau before the elections.

II. LEGAL FRAMEWORK

2.1. Amendment of the Regulation on the status of observers and the procedure for their accreditation

On 30.07.2025, the CEC adopted a decision²⁴ amending the Regulation on the status of observers and the procedure for their accreditation, although at that time observers from several observation missions had already been accredited²⁵. The Promo-LEX OM and the Ministry of Justice made recommendations to the CEC on this matter, but they were largely ignored.

When the decision to amend the Regulation was adopted, a separate opinion was formulated by CEC member Vadim Filipov²⁶, which contains objections similar to those brought by the Promo-LEX OM and the Ministry of Justice.

The amendments referred to the procedure for accreditation of observers: lit. e) was added to pt. 13 subpt. 1) of the Regulation, stipulating that “for the accreditation of observers, nongovernmental organizations shall present information on the availability of technical, human capacities, qualifications and experience in the field of election observation, which shall include the planned number of accredited persons, the number of monitored elections – separately in the country and abroad, the number of years of activity in the fields mentioned in pt. 10, the name of the organization/person/persons that will finance the work of the mission. If the association/organization will carry out observation from its own sources, the information confirming the financial sustainability of organizing the mission shall be presented/communicated.”

Subpt. 2) of pt. 13 provides for the accreditation procedure for international observers. It was completed with lit. g), which contains the same new requirements as those mentioned above.

From the analysis of the additional requirements included, we note that the conditions regarding the availability of “technical, human capacities, qualifications and experience in the field of election observation” are not clearly defined in the Regulation. The lack of clarity can lead to subjective interpretations on the part of the CEC, increasing the risk of arbitrary rejection²⁷ of accreditation applications, in violation of art. 19 of the Regulation and the principle of legality under the Administrative Code.²⁸

We shall mention that subpt. 3) of pt. 13 provides that the filing of documents with deviations from subpt. 1) and 2) is a ground for rejecting the candidate/candidates for observers or interpreters, or for rejecting the application submitted by the applicant entity. The CEC kept this provision without establishing exceptions, even though in the process of debating these amendments in the public meeting²⁹, the CEC members pointed out that these new amendments will not represent a conditionality, being included in order to ensure transparency.

We shall point out that the Electoral Code exhaustively establishes some conditions under which observers can be accredited: (1) compliance with the general rules on incompatibilities,³⁰ and (2) membership in public associations/non-commercial organizations dealing, according to the statute or other internal acts, with the defense of human rights or democratic values, or in electoral training and research institutions of Moldova that have the mission to observe the way elections are organized and conducted. There are no other conditions for accreditation of observers in the Electoral Code. Therefore, the amendments to the Regulation override the electoral legislation.

²⁴ [CEC Decision no. 3684 of 30.07.2025](#) amending the Regulation on the status of observers and the procedure for their accreditation, approved by the CEC Decision no. 1195/2023.

²⁵ CEC Decision no. [3612](#) of 25.06.2025; CEC Decision no. [3613](#) of 01.07.2025; CEC Decision no. [3625](#) of 04.07.2025.

²⁶ [Separate opinion](#) expressed by CEC member Vadim Filipov.

²⁷ According to art. 16 para. (2) of the [Administrative Code](#), the exercise of discretionary right does not allow the performance of arbitrary administrative activity.

²⁸ According to art. 21 para. (1) of the Administrative Code, the competent public authorities and courts must act in accordance with the law and other regulatory acts.

²⁹ [CEC meeting](#) of 30.07.2025.

³⁰ According to art. 88 para. (1) of the [Electoral Code](#), the status of observer is incompatible with the status of electoral official working within the electoral body, of candidate in elections, of member of an initiative group, of representative or trusted person of an electoral competitor or a participant in the referendum, and with that of treasurer.

Another amendment was made to pt. 30 of the Regulation, which extended the list of grounds for which an observer could have the accreditation canceled or a warning applied, by including the ground of “hampering the activity of the electoral body and jeopardizing the voting process.” In this regard, we consider that the terms “hampering” and “jeopardizing” are vague and can be interpreted subjectively, which increases the risk of disproportionate penalties and uneven application. This may violate the principle of proportionality under the Administrative Code³¹.

We shall point out that in the case of this amendment, too, the provision of the Regulation exceeds the provisions of the Electoral Code established in art. 102 para. (8).

In addition to the above, we shall point out that the respective amendments not only exceed the legal framework and make the accreditation procedure difficult/bureaucratic, but could also be contrary to international recommendations³².

In the context of the multiple deficiencies found, we recommend the central electoral authority to abandon the changes made.

2.2. Other amendments to the regulatory framework made by the Central Electoral Commission

During the observation period, the CEC initiated public consultations³³ to amend the Instruction³⁴ on the voting procedure with the mobile ballot box and to amend the Regulation³⁵ on the preparation, administration, dissemination and updating of voters lists (hereinafter the Regulation on voters lists).

The amendment of these regulatory acts most likely aims to ensure the transparency and integrity of voting with the mobile ballot box, in light of electoral incidents during the last ballots³⁶, but also to support the implementation of passport reading equipment at polling stations abroad, in order to increase the efficiency of electoral procedures.

However, we reiterate that the amendment of regulatory acts during the electoral period does not correspond to the principle of stability of electoral law, provided for in the Revised Interpretative Declaration to the Code of Good Practice in Electoral Matters on stability of electoral law³⁷.

The Promo-LEX OM sent to the CEC an opinion on these matters, in which it appreciated, on the one hand, the improvements made to clarify the voting procedures with the mobile ballot box, and at the same time identified some shortcomings that could affect inclusion. The findings presented include:

- The potential exclusion of persons with disabilities from the electoral process, through the requirement of personal submission or autonomous completion of applications, contrary to the UN Convention on the Rights of Persons with Disabilities³⁸;
- Lack of clarity in identification data (which data specifically should be indicated);
- Absence of provisions for prolonging the work of the polling station if the ballot box returns later than 21:00, etc.

Regarding the amendment of the Regulation on voters lists, we shall mention that it extends pt. 5 of the Regulation (voters lists) by including electronic lists. During consultations, Promo-LEX pointed out that the inclusion of the notion of “electronic voters list” in pt. 5, along with the addition of a separate compartment, is an insufficient measure from the point of view of the plenary and organic inclusion of a

³¹ According to art. 29 para. (1) of the Administrative Code, any measure taken by public authorities affecting the rights or freedoms provided by law must correspond to the principle of proportionality.

³² [Using International Election Standards](#): Council of Europe Handbook for civil society organizations / Council of Europe. - Chisinau: S. n., 2017 (ÎS „Tipografia Centrală”), p. 96.

³³ The CEC [announcement](#) on the organization of public consultation on amending the Instruction on the voting procedure with the mobile ballot box.

³⁴ [Instruction](#) on the voting procedure with the mobile ballot box, approved by CEC Decision no. 1154 of 4 August 2023.

³⁵ [Regulation](#) on the preparation, administration, dissemination and updating of voters lists, approved by CEC Decision no. 1153 of 4 August 2023.

³⁶ The case of the elections in [Bolduresti commune](#) and [the case in a seniors nursing home in Comrat](#), reported by Promo-LEX during the elections of 20.10.2024.

³⁷ [Revised Interpretative Declaration](#) to the Code of Good Practice in Electoral Matters on stability of electoral law. Adopted by the Venice Commission at its 139th plenary session (Venice, 21-22 June 2024).

³⁸ [Convention](#) on the rights of persons with disabilities.

new type of list in the body of the regulatory act subject to public consultations. The CEC took into account several proposals from the opinion sent by Promo-LEX.

In fact, the draft amendment of the Regulation represents a step forward towards the digitization of the electoral process, aligned in principle with the Electoral Code, but retains the vagueness and inconsistencies previously reported by the Promo-LEX OM.

The decisions amending the regulatory acts were adopted on 26 August 2025, about a month before voting day.

2.3. The Constitutional Court case law regarding the recent amendments to the legal framework

During the observed period, the Constitutional Court issued a decision³⁹ on a notification that requested the declaration of unconstitutionality of the text “do not have the right to participate in elections” in art. 11 para. (7)⁴⁰ of Law no. 294 of 21 December 2007 on political parties.

The authors of the notification invoked⁴¹ the fact that the text “do not have the right to participate in elections” limits the right of political parties to participate in elections, to present their political program and their opinion on the political programs of electoral competitors, contrary to art. 32 of the Constitution. They added that the Parliament adopted the contested text only three months before the elections and one month before the start of the period of nominating candidates, and the prohibition to participate in elections is a disproportionate penalty, affecting the very essence of the right to participate in political life. The contested text does not provide for a reasonable time limit for the registration of the political bureau and no mechanism for warning, notification, or remedy.

In this context, we would like to remind that the Promo-LEX OM has previously warned⁴² about the risks that recent amendments to the Law on political parties may generate.

The Constitutional Court declared the notification inadmissible, stating that the obligation to present information about the members of the governing bodies of parties is not an excessive burden. This obligation is justified by the public interest towards the leaders of the parties seeking to participate in elections. The Court notes that from the moment of registration of the political party, it is natural for its leaders to assume that the party acquires legal personality and that it implicitly accesses a space of public interest. Moreover, it should be borne in mind that the leadership of a political party exerts a direct influence on the decision-making process, the electoral climate, and that it seeks to take on representative public offices. In this respect, the obligation to present information about the members of governing bodies is justified by the need to ensure the transparency and accountability of political parties, and it guarantees effective supervision of the activity of parties, the Court notes.

Another notification⁴³ was filed with the Constitutional Court by PLDM. The author of the notification claims that the challenged provisions,⁴⁴ as they were applied by the CEC, reduce the time limit for the registration of electoral competitors provided by art. 63 para. (1) of the Electoral Code and hinder the updating of the list on the basis of the data subsequently presented by the PSA. Consequently, these provisions, applied in an unclear and unpredictable manner, disproportionately restrict the right to be elected.

³⁹ [Constitutional Court](#) Decision no. 113 of 12 August 2025 on the inadmissibility of notification no. 182g/2025 regarding the exception of unconstitutionality of the text “do not have the right to participate in elections” in art. 11 para. (7) of Law no. 294 of 21 December 2007 on political parties (prohibition to participate in elections for political parties that do not submit to the PSA in due time the numerical and nominal list of presidents, vice-presidents, and members of central executive bodies).

⁴⁰ According to art. 11 para. (5) lit. b) and para. (7) of [Law no. 294](#) of 21 December 2007 on political parties, political parties that, before the beginning of the electoral period, did not submit to the Public Services Agency the numerical and nominal list of members of the political party that fall under art. 3 para. (1) lit. e⁵) of Law no. 133/2016 on the declaration of wealth and personal interests, do not have the right to participate in elections.

⁴¹ Pt. 14-18 of Constitutional Court Decision no. 113 of 12 August 2025.

⁴² [Report no. 1](#), Promo-LEX Observation Mission for the parliamentary elections of 28 September 2025, p. 16.

⁴³ [Notification](#) no. 189g of 22 August 2025 on the exception of unconstitutionality of the provisions of art. 12 para. (4) and art. 27 lit. g) of the Electoral Code.

⁴⁴ Art. 12 para. (4) of the Electoral Code, which establishes that the CEC approves the calendar of electoral activities, setting out the deadlines expressed in calendar days for their implementation. Art. 27 lit. g) of the Electoral Code, which establishes that, during the electoral period, the CEC has the following powers: [...] based on the data presented by the PSA, it publishes the list of political parties that have the right to participate in elections.

The Constitutional Court declared the notification inadmissible, concluding that the incidence of the fundamental rights invoked by the author of the notification was not demonstrated, that is, the author of the notification did not present to the Court sufficient arguments that the challenged rules allow interference with fundamental rights.

2.4. Application of the sanction in the form of deprivation of the right to conduct electoral advertising activities in relation to a political party

On 05.08.2025, the Chisinau Court issued a judgment⁴⁵ concerning the PCRM, by which it was imposed a penalty in the form of a fine of MDL 12,000, with deprivation of the right to carry out electoral advertising activities for a period of 3 months, for committing the contravention provided by art. 50 of the Contravention Code, namely for the provision of electoral advertising through printed materials (leaflets) containing exaggerated information and statements that did not correspond to reality. The actions for which PCRM was sanctioned referred to the 2024 referendum, where it was a participant in the referendum⁴⁶.

Art. 50 of the Contravention Code provides that the provision of advertising materials for electoral campaigning that do not meet the conditions of Law no. 62/2022 on advertising is sanctioned with a fine and/or deprivation of the right to carry out certain activities for a term from 3 months to one year.

The law allows applying a complementary punishment, which is indicated in the special part of the Contravention Code. In general, the application of complementary sanctions in the form of deprivation of the right to carry out a certain activity is an area of discretion of the court, only that discretion must be applied according to the rules established in art. 35 of the Contravention Code. Thus, this sanction is applied in cases where, taking into account the nature of the contraventions committed by the guilty person, the law declares inadmissible the conduct of a certain activity or the holding of a certain position by this person. For example, the law prohibits the financing of political parties by minors, and prohibits representatives of religious faiths from carrying out activities related to electoral campaigning, and so on.

In another respect, the proportionality of the punishment is not limited to compliance with the letter of the law, but must be assessed on the basis of the gravity of the contravention, the purpose of the sanction and the effects on fundamental rights. Proportionality is a key principle in European law (EU Charter of Fundamental Rights⁴⁷ and ECtHR case law⁴⁸), which requires that any restriction of rights (such as the right to political expression or electoral participation) be necessary and fit for purpose. A three-month prohibition just before the election is equivalent to a partial exclusion from campaigning, since electoral advertising is essential for the visibility of a party (electoral posters, TV spots, online campaigns, etc.).

In view of the above, the punishment seems excessive, as it could alter the electoral balance and undermine political pluralism. The ECtHR condemned the electoral restrictions imposed in similar cases⁴⁹, considering them disproportionate, if there is no clear evidence of a serious threat to democracy.

⁴⁵ The [judgment](#) of Chisinau Court, Buiucani Office, of 05.08.2025, handed down in the contravention case against the Party of Communists of the Republic of Moldova.

⁴⁶ CEC Decision no. [2723](#) of 23.08.2024 on the application of the Party of Communists of the Republic of Moldova for registration as a participant in the republican constitutional referendum of 20 October 2024.

⁴⁷ Art. 52, para. 1 of the [Charter](#) of Fundamental Rights of the European Union.

⁴⁸ [Hirst v. the United Kingdom](#), 2005, para. 76-85.

⁴⁹ [Podkolzina v. Latvia](#), 2002, para. 36-38.

III. ELECTORAL BODIES AND PUBLIC ADMINISTRATION

3.1. The work of the Central Electoral Commission

Approval and transparency of decisions on the organization and conduct of elections. During the period under observation, the CEC managed the process of organizing parliamentary elections efficiently, according to legal deadlines and, for the most part, transparently. Access to the public meetings of the CEC was provided; they were broadcast live, and the respective recordings are also available. The decisions adopted were published within legal deadlines. Summaries of the CEC meetings are published. At the same time, at the time of drafting this report, not all documentation relevant to the organization and conduct of elections was available on the CEC website, such as the PLDM's requests to be included in the list of parties with the right to participate in elections, or the MFA's opinion on the establishment of polling stations abroad.

The CEC met in 21 meetings and adopted 202 decisions. Most of the decisions concerned the nomination and registration of competitors, the establishment and activity of hierarchically lower electoral bodies, and the accreditation/confirmation of persons authorized to participate in the electoral process. Compared to the similar reporting period in previous elections⁵⁰, the CEC approved a larger number of decisions in a larger number of meetings. This increase is due to the larger number of applications for registration of competitors in the current parliamentary elections.

Based on the information publicly available on the CEC website in the section of vacant positions, we deduce that the problem of human resources shortage remains valid for the CEC staff. At least 8 contests initiated and held before the electoral period are marked as closed, but the names of the persons who won the contest are not published⁵¹.

We shall point out that some members of the CEC, in the context of exercising their rights and obligations under the law, faced pressure at the limit of intimidation. These actions constitute prohibited interference in the exercise of official functions, may affect the institutional independence of the authority, as well as have the effect of undermining public confidence in the fairness of the electoral process.

Accreditation of observers. During the observation period, the CEC accredited 1,252 observers: 1,176 national observers and 76 international observers and experts.

In total, in order to monitor the elections of 28 September 2025, the electoral authority accredited 1,325 observers from 12 national and foreign institutions: 1,249 national observers and 76 international observers and experts, including international election observation missions ENEMO and OSCE/ODIHR.⁵² Of the total number of national observers, 627 (65%) were from Promo-LEX Association.

Compared to 2024, when about 719 observers were accredited before the electoral campaign⁵³, in this parliamentary election we find a larger number of accredited observers.

For the first time ever, at these elections the CEC made a public appeal to "election monitoring organizations" calling for "prudence and accuracy in the public presentation of findings".⁵⁴ In the absence of conclusive examples and references to "formulations that may give rise to interpretations that are erroneous or do not correspond to reality," as well as in the absence of precise mentions of which organization they mean, the Promo-LEX OM considers that the message of the CEC can be perceived as a deterrent to the activity of observers.

Approval of public interest messages. During the observed period, the CEC approved 17 decisions on messages of public interest, with the following topics: information on voting procedures (8); call for participation in voting (3); on electoral/political corruption (2); and on non-electoral topics (4). Thus, about 24% of the approved public interest messages do not refer to current electoral topics. In this

⁵⁰ [Report no. 2](#). Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024. p. 11.

⁵¹ Current [vacancies](#). The CEC staff.

⁵² Parliamentary elections 2025. [Accreditation of observers](#).

⁵³ [Report no. 2](#). Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024. p. 11.

⁵⁴ [Public appeal](#) to election monitoring organizations.

context, the CEC also approved guidelines/information leaflets in five languages (Romanian, Ukrainian, Russian, Gagauz, and Romani).

Authorization to conduct opinion polls and exit polls. By the date of publication of this report, the CEC authorized eight entities with the right to conduct 13 opinion polls on the political preferences of voters.⁵⁵

At the same time, the Promo-LEX OM identified at least 10 cases that can be qualified as unauthorized conduct of opinion polls about the political/electoral preferences of voters (see Annex 1). We attest to a trend of online promotion of polls during the electoral period. We shall remind that, according to regulations⁵⁶, opinion polls on the political preferences of voters, conducted during the electoral period, must be authorized by the CEC. In these circumstances, we ask the CEC to investigate the reported cases and, if necessary, to involve other competent institutions, in order to ensure compliance with the legal framework on the organization and dissemination of surveys, as well as the transparency of their financing.

Certification of electoral officials. During the current observation period, the certification of potential electoral officials by the Center for Continuous Electoral Training (CCET) and the CEC continued. The transparency of the process was ensured by providing full information about the results of certification on the CCET website⁵⁷.

Statistically, according to CCET, 158 exams (offline and online) were organized during the monitored period, attended by 2,735 persons, with 2,188 potential officials (80%) having passed the evaluation. The certification session is open until 5 September 2025, and 6,037 persons have been certified in this session by 24 August, according to CCET. The intensity of certification increased as the period of establishment of polling stations approached. Thus, about 39% of the total number of exams held in the reporting period took place during the week of 18-24 August. Overall, according to statistics, 25,557 persons are certified. At the elections in autumn 2024, slightly over 20,000 citizens worked as electoral officials (DEC and PEB).

Statistics do not provide data segregated by geographical criteria – in the country and abroad. Given the difficulties observed in the previous elections, as well as the CEC’s decision to supplement the number of PSs open abroad with about 70 stations, we reiterate the recommendation to pay particular attention to the certification of potential officials who will work in PSs abroad.

Promo-LEX observers also had access to certification exams. In the period of 12 to 23 August 2025, they monitored the organization and conduct of 28 certification exams in 13 electoral districts. Observers rated the organization of exams as “efficient” and “good”. In three cases, however, according to LTOs, assistants consulted the exam takers.

⁵⁵ [Authorization](#) to conduct opinion polls and exit polls.

⁵⁶ [CEC Regulation](#) on the organization and conduct of opinion polls and exit polls during the electoral period

⁵⁷ [Session 2025](#) – CCET. Certification exams for electoral training/specialization.

3.2. Organization of polling stations for voters abroad

According to art. 39 para. (5) of the Electoral Code, the main ground for establishing PSs abroad is the dynamics of voter participation in the last three ballots. In addition, one shall take into account the data of prior registration and the information presented by the MFA on the number and place of stay of Moldovan citizens abroad. Contrary to the Promo-LEX recommendations, the CEC Regulation does not clarify how the application of the main ground is correlated with the application of complementary grounds and what their weight is in calculating the number of PSs⁵⁸.

According to legal provisions, but also in accordance with the terms of the *Work plan for the organization of polling stations abroad*⁵⁹, the Ministry of Foreign Affairs (MFA) presented to the CEC its recommendations on the list of polling stations (PSs) abroad and their location⁶⁰. The MFA, in principle, proposed to keep the same list of stations as in the 2024 ballots, but with a number of additions and changes. The CEC published those recommendations for public consultation on the information regarding the number and possible locations of PSs abroad⁶¹. Initially, the MFA proposed to organize 294 PSs, and the proposal was later supplemented with three more stations – 297 in total, without the stations for postal voting. In accordance with legal provisions, on 24 August 2025, the CEC approved the organization of 301 PSs abroad, of which four for postal voting⁶². Thus, the CEC fully supported the proposals made by the MFA.

With regard to the increase in the number of polling stations by about 70 units compared to the 2024 ballots, the Promo-LEX OM, in principle, supports the efforts to make voting abroad accessible. However, we shall remind that at the last elections the ballot papers were practically exhausted only in the PSs in the Russian Federation (5,000 papers per station) and the United Arab Emirates (500 papers). In the other countries, including where it is proposed to increase the number by 10-15 PSs, there were no cases of exhaustion of ballot papers. Moreover, according to Promo-LEX analysis, in the 2024 elections, there were at least 20 PSs abroad in the second round, established outside embassies/consulates, where less than 500 people voted. They were in Canada, Germany, Italy (8), the UK (2), the Netherlands, Portugal, Spain (2), and the USA (4). Accordingly, it seemed more reasonable to relocate polling stations, and not necessarily increase their number.

The recommendations of the MFA, respectively the CEC decision, indicate a careful analysis of the information on the number and location of citizens abroad, including those who would potentially be on holiday. At the same time, we shall point out that the organization of PSs abroad seems to completely disregard the main ground provided by the Electoral Code – the dynamics of participation in the last three ballots. The recommendations of the MFA, according to which the CEC approved its decision, given the argumentation notes, are based solely on the results of participation in the 2024 ballots. In addition, it is not clear why the MFA, when determining the number of PSs, in many cases follows from the logic of increasing the number of PSs where more than 2,000 voters voted. Referring to another argument put forward by the MFA for the establishment of new stations – the number of voters greater than 500 in certain countries, we shall remind that according to art. 39 para. (3) of the Electoral Code this number refers to “one locality or several localities” and not to a whole country.

The Promo-LEX OM examined the CEC decision and came up with its own estimate for the distribution of the 297 PSs per country. Due to the lack of clear regulations on how to apply legal grounds, ***in its estimation Promo-LEX used strictly mathematical calculations according to the main ground – the dynamics of participation in the last three ballots, each ballot being assigned an equal weight***. For the presidential elections (2020 and 2024), the results of participation in the second round were used⁶³.

⁵⁸ Promo-LEX Association’s [proposals](#) for the Joint Opinion of the Venice Commission and OSCE/ODIHR on the Draft Electoral Code of the Republic of Moldova (Law no. 288). p. 11.

⁵⁹ [Work plan](#) for the organization of polling stations abroad for the parliamentary elections of 28 September 2025.

⁶⁰ [MFA proposals](#) on the number and possible locations of PSs abroad.

⁶¹ Parliamentary elections 2025: [The CEC publishes proposals](#) for polling stations abroad

⁶² [CEC Decision](#) no. 3851 of 24.08.2025 on the organization of polling stations abroad and polling stations for postal voting for the parliamentary elections of 28 September 2025.

⁶³ Participation in the second round was chosen in order to take into account the maximum number of voters who voted in the respective ballot.

Table 1. Promo-LEX estimate based on the CEC decision

No.	COUNTRY	ELECTION 2024	ELECTION 2025 MFA / CEC proposals	Promo-LEX estimate 2025	Difference
1.	Austria	2	3	3	0
2.	Azerbaijan	1	1	1	0
3.	Belarus	1	1	1	0
4.	Belgium	4	5	7	+2
5.	Bulgaria	1	1	1	0
6.	Canada	6	7	6	-1
7.	Czechia	2	2	4	+2
8.	China	1	1	1	0
9.	Cyprus	1	1	1	0
10.	Denmark	2	2	1	-1
11.	Switzerland	2	2	3	+1
12.	United Arab Emirates	1	2	1	-1
13.	Estonia	1	1	1	0
14.	Finland	0	1	0	-1
15.	Russian Federation	5	2	10	+8
16.	France	20	26	28	+2
17.	Germany	26	36	32	-4
18.	Greece	2	4	3	-1
19.	India	1	1	1	0
20.	Ireland	10	12	12	0
21.	Iceland	0	1	0	-1
22.	Israel	2	2	5	+3
23.	Italy	60	75	80	+5
24.	Japan	1	1	1	0
25.	Kazakhstan	0	1	1	0
26.	Latvia	1	1	1	0
27.	Lithuania	1	1	1	0
28.	Luxembourg	0	1	0	-1
29.	United Kingdom	17	24	27	+3
30.	Norway	1	2	1	-1
31.	Poland	1	1	1	0
32.	Portugal	6	6	7	+1
33.	Qatar	1	1	1	0
34.	Netherlands	2	3	4	+1
35.	Romania	16	23	22	-1
36.	Spain	11	15	10	-4
37.	USA	16	22	10	-12
38.	Sweden	1	1	1	0
39.	Turkey	2	2	3	+1
40.	Ukraine	2	2	3	+1
41.	Hungary	1	1	1	0
TOTAL		231	297	297	

The biggest differences between the MFA proposals and Promo-LEX estimates are in the case of Italy, where, according to mathematical calculations, five PSs more must be established, Germany – four fewer, and the USA – 12 fewer. In the case of the USA, we are aware of the long distances that might have motivated the increase, but a nuanced approach is needed for each PS.

Starting from the “obligation of the state to guarantee the security of its citizens”⁶⁴, the authorities decided that for the cases of Israel (complicated security situation), Ukraine and the Russian Federation (countries at war as a result of Russia’s aggression on Ukraine), two polling stations should be organized

⁶⁴ [MFA proposals](#) on the number and possible locations of PSs abroad.

in each. Regarding the Russian Federation, the Promo-LEX OM considers that in addition to threats to citizens' security, there are also vulnerabilities related to the integrity of the electoral process⁶⁵.

As for prior registration as a complementary ground, except for the Russian Federation, we see a decrease in the interest of the citizens living abroad for this mechanism, a trend that started from the 2024 ballots. We consider that it is based on two reasons: on the one hand, until the adoption of the new Electoral Code, this was a main ground, and not "secondary", and on the other hand, due to the fact that prior registration is a procedure valid for several ballots, citizens who have already registered can no longer do this again.

Table 2. Dynamics of prior registration for the 2025 parliamentary elections (top 4 states)

State/2025	02.05	19.05	13.06	26.06	14.07	21.07	11.08	Final
Italy	27	37	51	64	91	103	261	484
United Kingdom	23	30	62	70	83	91	206	259
Germany	28	42	55	63	91	100	269	436
Russian Federation	13	20	32	515	5,108	6,591	12,039	13,040
Total (2025)	220	338	546	1,135	5,926	7,505	14,136	16,148

Regarding prior registrations for the Russian Federation, like in the 2024 ballots, Promo-LEX again "finds an unusual increase in prior registrations, contrary to the continuous decrease in the number of Moldovans in that country in recent years."⁶⁶ Registrations for the Russian Federation accounted for about 81% of the total number of registrations for 2025.

In addition, according to the CEC, these registrations, "like in the 2024 ballot, raise reasonable suspicions that most of the registrations were made personally by the voters and denote a concerted action to mislead the electoral authority and the public opinion regarding the veracity of the registrations and the actual number of requests for the organization of polling stations in this country."⁶⁷ Thus, we find that these unnatural results for prior registration affect the credibility of that ground.

Regarding the second complementary ground – the MFA estimates, they reflect, in principle, the figures presented by the MFA for the 2024 ballots. We shall remind that, according to them⁶⁸, over time, compared to 2020, the authority found the largest increases in the number of citizens (in approximate values) in Italy (+171,000), France (+143,000), USA (+80,000), and Germany (+71,000). On the other hand, a decrease in the number of Moldovan citizens was observed in some states, for example in the Russian Federation (-100,000).

The Promo-LEX OM reiterates its position that the number of PSs abroad will not be able to increase indefinitely. The organization of such a large number of PSs, beyond financial resources, implies an overload of human resources. Compared to Romania, by reporting the number of stations abroad to the total number of voters, Moldova organizes practically twice as many stations. We shall remind that the current electoral legislation also provides for other mechanisms to make voting abroad accessible, such as voting over two days. Also, for the next national elections, the authorities must come up with a clear position in advance on the "universal" applicability of postal voting.

Organization of polling stations for postal voting. The partial implementation of postal voting, initiated in the 2024 ballots, continued in the current parliamentary elections. Promo-LEX recommended, based on the experience of 2024 and the proximity of the parliamentary elections of 2025,

⁶⁵ The Promo-LEX OM for the presidential election and constitutional referendum of 2024 found several incidents that affected the integrity of the voting procedures in the stations organized in the Russian Federation. For details see: Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October (3 November) 2024: [Latest data on voting day](#); [Details on the conduct of the ballots](#).

⁶⁶ [Final report](#), Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024, p. 23.

⁶⁷ [CEC Decision](#) no. 3851 of 24.08.2025 on the organization of polling stations abroad and polling stations for postal voting for the parliamentary elections of 28 September 2025.

⁶⁸ [Report no. 2](#), Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024, p. 18.

that for this autumn's elections this alternative voting mechanism should be applied partially, given the insufficient time for a "universal" implementation⁶⁹. Already after these elections, the authorities are to decide in due time on the strategy to make voting abroad accessible. Referring to the future implementation of postal voting, the Promo-LEX OM insists on the idea that it should be available to all voters abroad.

In these elections, the number of states for which PSs for postal voting are established increased from 6 to 10⁷⁰. In the case of three new states – the Republic of Korea, the Commonwealth of Australia, and New Zealand – Moldovan citizens for the first time had the opportunity to register for postal voting.

Statistically, compared to 2024, the number of requests increased from 1,986 to 2,606⁷¹. The share of registrations from the newly added states is about 4%. In this context, we shall point out that an increased interest in postal voting was manifested, in particular, in states where this mechanism is implemented repeatedly.

Table 3. Dynamics of registration for postal voting 2024-2025

	2024, registrations ⁷²	2025, registrations	Difference
United States of America	1,086	1,399	+313
Canada	580	682	+102
Sweden	91	166	+75
Finland	72	121	+49
Norway	131	109	-22
Iceland	26	38	+12
Republic of Korea	0	13	-
Commonwealth of Australia	0	57	-
New Zealand	0	7	-
Japan	0	14	-

Initially, the CEC budgeted costs for 10 polling stations for postal voting⁷³. Subsequently, by CEC Decision no. 3851 of 24.08.2025, four polling stations were approved.⁷⁴ The reduction in the number might indicate higher expectations on the part of the institution regarding the applicability of this mechanism.

In addition, we shall point to possible problems of interpretation of the provisions of art. 13 para. (2) of the Law on the partial implementation of postal voting, with reference to the organization of the polling station for Japan (14 applications), the Republic of Korea (13 applications), and New Zealand (7 applications). We shall remind that the legal norm establishes that "polling stations (...) comprise at least 30 and not more than 2,500 voters included in voters lists for postal voting *in the territory of one country.*"

3.3. Organization of polling stations for voters from the left bank of the Dniester

According to Promo-LEX, the organization of polling stations for voters from the left bank of the Dniester should be treated in a broader context of the need for democratization and reintegration of the uncontrolled region. The current geopolitical environment must be used by the constitutional authorities to make the so-called Tiraspol authorities accept some demands, which in the future would ensure conditions for democratization of the Transnistrian region. The efforts of the Moldovan authorities, from the perspective of integrating voters from the region into national democratic electoral processes, should be focused on guaranteeing access to the national media in the region, competitors, observers, etc. These efforts will contribute substantially to preventing, and counteracting as necessary, attempts to damage the fairness of the electoral process.

⁶⁹ [Final report](#), Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024, p. 25-26.

⁷⁰ [Law no. 129](#) of 29.05.2025 amending Law no. 109/2024 on the partial implementation of postal voting.

⁷¹ [Press release](#). Registration for postal voting has ended

⁷² Number of registrations up to the verification stage. [CEC Decision no. 3328](#) of 16.01.2025 on the approval of the Report on the partial implementation of postal voting as an alternative method of voting in the republican constitutional referendum and election for the office of president of the Republic of Moldova of 20 October 2024.

⁷³ [CEC Decision](#) no. 3237 of 28.11.2024 on the approval of the budget of the Central Electoral Commission for 2025.

⁷⁴ [CEC Decision](#) no. 3851 of 24.08.2025 on the organization of polling stations abroad and polling stations for postal voting for the parliamentary elections of 28 September 2025.

The establishment of separate polling stations for voters from the Transnistrian region of the Republic of Moldova, which is not controlled by constitutional authorities, is regulated by the Electoral Code and the CEC Regulation on the establishment of polling stations for voters from localities on the left bank of the Dniester⁷⁵.

Thus, when setting up polling stations for voters from localities on the left bank of the Dniester, the CEC must take into account data from the State Registry of Voters (SRV) in relation to the dynamics of voter participation in the last three ballots and, in addition, the information or proposals of the entities responsible for implementing the reintegration and security policy. However, according to the Promo-LEX OM, the CEC regulations do not provide enough detail on how to calculate the number of stations by reporting data from the SRV to the dynamics of participation in the last three ballots.

According to the approved decision⁷⁶, the CEC established 12 PSs for these elections, 18 fewer than for the ballots in 2024. Fewer stations, 8-11, were organized only in 2001-2009⁷⁷. According to the decision, the CEC calculated the number of stations by dividing the number of voters from the left bank of the Dniester according to the SRV (278,777) by the average voter turnout in the region in the last three ballots (23,264 – data for the first round, and 28,954 – data for the second round).

Starting from the Commission’s decision to locate stations depending on the number of voters who participated in the last elections, we would like to draw attention to the fact that, in particular, the PS in Cocieri might face overcrowding. This is given that at the ballots in 2024, there were two stations in the village, where a total of 2,343 voters voted, and for the current elections only one station will be created. In addition, in the neighboring localities, Ustia and Molovata Noua, there will no longer be any stations.

Table 4. Changes in the number of polling stations established for voters from localities on the left bank of the Dniester (2014-2025)

Election type	Parliamentary 2014	Presidential 2016	Parliamentary 2019	Presidential 2020	Parliamentary 2021	Presidential, Referendum 2024	Parliamentary 2025
Number of PSs	26	30	47	42	41	30	12
Number of voters who voted	9,261	1st round – 6,964 2nd round – 16,728	NED ⁷⁸ – 37,257 SMD – 36,696	1st round – 14,711 2nd round – 31,783	28,791	1st round – 16,133 2nd round – 26,288	-
Average number of voters per PS	356	1st round – 232 2nd round – 696	NED – 793 SMD – 781	1st round – 350 2nd round – 757	702	1st round – 538 2nd round – 876	-

The decision-making process, carried out according to the Work plan⁷⁹, included several local public administration authorities (from ATU where such polling stations were previously organized) and central authorities (Bureau for Reintegration Policies (BRP), General Police Inspectorate (GPI), Security and Intelligence Service (SIS)). The documents related to the process are published on the CEC website⁸⁰.

The GPI proposed to organize nine stations for voters from the left bank of the Dniester and informed the Commission about the risks related to the electoral process. In particular, these include: electoral bribes

⁷⁵ [Regulation](#) on the establishment of polling stations for voters from localities on the left bank of the Dniester, approved by CEC Decision no. 2544 of 28 May 2024.

⁷⁶ [CEC decision no. 3852](#) of 24.08.2025 on the organization of polling stations for voters from localities on the left bank of the Dniester for the parliamentary elections of 28 September 2025.

⁷⁷ [Promo-LEX policy paper](#). Establishment of polling stations for voters from the left bank of the Dniester. pp. 11-12.

⁷⁸ The 2019 parliamentary election was based on the mixed electoral system, respectively the meaning of abbreviations is: NED – national electoral district, and SMD – single member district.

⁷⁹ [Work plan](#) on the organization of polling stations for voters from localities on the left bank of the Dniester in the parliamentary elections of 28 September 2025.

⁸⁰ For example, [the address](#) of the Security and Intelligence Service.

offered to voters who are transported in an organized manner; blocking of access to polling stations by false alerts (“bomb” or “suspicious object”) in the vicinity of bridges; organization of spontaneous protests. The SIS, taking note of particular dangers to state security, recommended the organization of eight polling stations. The BRP also urged the CEC, when establishing the number of PSs, to pay much more attention than in the past to the risks of security, public order, and destabilization.

In the policy paper prepared in 2021, the Promo-LEX Association concluded, based on its calculations, that “28 polling stations is a reasonable number to ensure the participation in the vote of citizens from the left bank of the Dniester.”⁸¹ The electoral legislation at that time provided that separate stations would be opened “based on data from the State Registry of Voters” and that “the number of voters who participated in the previous ballots shall be taken into account.” These criteria are provided for in the current legislation, too, but without the phrase “in relation to.” In the ballots of 2024, the Promo-LEX OM supported the CEC decision to organize 30 polling stations, noting that “based on the average number of voters per station and under the condition of their relocation, access to vote was ensured by a sufficient number of PSs.”⁸²

Regarding the number of PSs organized for the 2025 parliamentary elections, the Promo-LEX OM considers that, based only on the dynamics of participation in the last three ballots, the decrease of the number of PSs by about three times seems unjustified. Given the arguments put forward by the authorities, in addition to the application of legal criteria, the CEC decision is seemingly based, in particular, on reasons of security and integrity of the voting process.

In this context, based on the experience of previous ballots, the Promo-LEX OM confirms the existence of potential dangers that the vote cast by voters from the left bank of the Dniester might be damaged by electoral bribes and organized transport to polling stations. In the Final report to the ballots of 2024, the Promo-LEX OM concluded that the mission “is concerned by the rumors regarding the offering of monetary rewards (25 cases), which referred predominantly (52%) to the voters from the Transnistrian region.”⁸³

Thus, on the one hand, the Promo-LEX OM continuously supported the need to ensure access to vote for voters from the districts on the left bank of the Dniester, as a measure to promote the right of the citizens in the region to be involved in national democratic political processes. Based on legal provisions, the specifics of the location of stations, the travel distances and the existing access routes, Promo-LEX considered that the number of 28 PSs is a reasonable one.

At the same time, given the intensification of dangers to the integrity and security of the electoral process, generated by the fact that the constitutional authorities do not effectively control what happens in the region, we consider, for the most part, justified the actions of the authorities to optimize the number of stations. However, we shall draw the attention of the authorities that the reduction in the number of PSs may still cause a decrease in the dynamics of voter participation, respectively, in the long term, it will generate a continuous and stable decrease in the number of stations.

Some opposition parties criticized the decision to reduce the number of polling stations.⁸⁴ The so-called Tiraspol authorities also reacted,⁸⁵ condemning the intention to reduce the number of polling stations and demanding unrestricted access for Moldovan citizens from the left bank of the Dniester to the voting process. This is the second time, after the ballots of 2024,⁸⁶ that the respective “institutions” request “unrestricted access for participation in the elections” in the Republic of Moldova.

In this context, the Promo-LEX OM reiterates that the vote of the voters from the localities on the left bank of the Dniester should be informed and assumed, and the electoral campaign should be carried out

⁸¹ [Promo-LEX policy paper](#). Establishment of polling stations for voters from the left bank of the Dniester. p. 18.

⁸² [Final report](#). Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024. p. 27.

⁸³ [Final report](#). Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024. p. 94.

⁸⁴ [PSRM](#): We demand equal vote for all Moldovans. CEC – under the control of the opposition!

⁸⁵ [The Presidium of the Supreme Council of the PMR](#) addressed a statement to the Parliament and the Central Electoral Commission of the Republic of Moldova, as well as to international organizations.

⁸⁶ [Report no. 4](#). Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024. p. 17-18.

in compliance with the guarantees of all electoral actors, including on the territory currently uncontrolled by the constitutional authorities.

3.4. Activity of district electoral councils

Confirmation and modification of DEC composition. According to art. 35 para. (4) of the Electoral Code, the following entities have the right to designate members to DEC: the court and local council in whose territorial area the respective district electoral council is located (two members each); political parties represented in the Parliament (one member each).⁸⁷

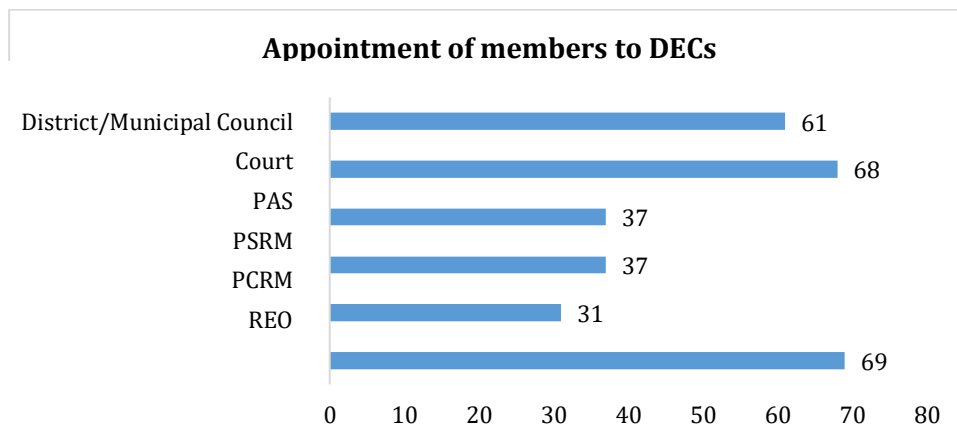
On 30 July 2025, within the deadline stipulated by the calendar of activities, the CEC established district electoral councils for the localities on the left bank of the Dniester (DEC no. 37) and for polling stations abroad (DEC no. 38), and confirmed the nominal composition of the 37 councils. A numerical composition of 9 members was established for the majority of DEC (i.e. 33 DEC); for 3 DEC (no. 1 Chisinau, no. 2 Balti, no. 38 for polling stations abroad) – 11 members; and only for DEC no. 37 on the left bank of the Dniester a numerical composition of 7 members was established.

Promo-LEX OM observers analyzed the decisions confirming and modifying the composition of electoral councils, made visits to all DEC, and have found the following:

- Gender equality is not ensured when establishing electoral bodies, the share of women members of DEC being significantly higher than that of men (72% versus 28%);
- Leadership positions are also mostly filled by women (59% versus 41% – chairperson, and 70% versus 30% – secretary);
- The secret voting procedure for the election of the secretary was observed in the absolute majority of cases, with the exception of DEC no. 36 ATU Gagauzia.⁸⁸

The appointment of members to the electoral body by the entities having this right is reflected in Chart 1.

Chart 1



Based on the information analyzed by observers in the decisions establishing DEC, we find that two of the three parliamentary parties – PSRM and PAS – delegated members to all DEC. Analyzing the appointment of members to DEC, compared to the previous ballot, it has been found that in some cases the same members, currently appointed from REO (3) and LPA (1), were previously appointed by political parties: in three cases by PAS and in one case by PSRM.⁸⁹ In this context, it is necessary, especially in the case of appointments made from the REO, the electoral body to ensure compliance with the representativeness of each subject that has the right of appointment according to the law, taking into account the experience of electoral officials and the history of appointments.

⁸⁷ We shall remind that the chairperson of DEC works with permanent status, being appointed in accordance with Law no. 158/2008 on public office and the status of civil servant.

⁸⁸ According to art. 36 para. (2) of the Electoral Code, in case of early termination of the mandate of the chairperson and secretary of the Central Electoral Council of Gagauzia, until the seat is filled by another person, ad interim appointment and termination shall be ordered by a decision of the Central Electoral Commission.

⁸⁹ PAS – REO (DEC no. 13 Donduseni, no. 21 Ialoveni, no. 36 ATUG) and PSRM – LPA (DEC no. 15 Dubasari).

For 5 DEC, the local councils did not appoint members – DEC no. 1 Chisinau, DEC no. 25 Orhei, DEC no. 34 Telenesti, DEC no. 37 for the left bank of the Dniester, and DEC no. 38 for voters abroad.

According to art. 35 para. (5) of the Electoral Code, DEC members appointed by courts and local councils must have higher education in law or in public administration. The analysis of the CEC decision confirms compliance with this requirement, and the share is even higher, with 69% of the appointed members having education in law or in public administration.

During the monitored period, the nominal composition of eight DEC, underwent changes based on the following circumstances: six cases of replacement of the DEC composition, five requests for resignation, and one case of revocation.

Regarding revocation, according to CEC Decision no. 3749/2025⁹⁰, based on the notification of Orhei Police Inspectorate and the examined evidence, the CEC found that Mr. Serghei Șteliman, member of DEC no. 25 Orhei, violated the principles of integrity and impartiality provided by art. 42 and art. 102 para. (6) of the Electoral Code, by engaging in corruption actions during meetings. Since such acts are incompatible with the status of an electoral official, the Commission ordered his revocation and the prohibition to carry out any activity in electoral bodies for a period of 2 years.

Compliance with the work schedule. According to Promo-LEX observers, in 97% of the 149 visits made, DEC, were open during working hours⁹¹.

Accessibility of DEC premises. According to reports of Promo-LEX observers, only 17 (46%) electoral councils are accessible to vulnerable groups, 3 (8%) are partially accessible, and 17 (46%) are inaccessible. We believe that, by virtue of art. 51 of the Constitution of the Republic of Moldova, state institutions must provide normal conditions of social integration for persons with special needs, including participation in the electoral process at all levels.

Difficulties in the work of electoral bodies. During visits to the territory and after discussions with electoral officials, observers found that 2 councils (DEC no. 37 for the left bank and DEC no. 38 for voters abroad) did not have a distinct space/premises for the proper conduct of work for at least 3 weeks from their establishment. Likewise, we found limited access to the offices subsequently granted to these DEC, because those offices are located within the premises of state institutions where access for unauthorized persons is restricted, in some cases the prior approval of DEC representatives being required. In this respect, the Promo-LEX OM reiterates the need to ensure free access during the monitoring process.

Establishment of polling stations. By the deadline of 24 August 2025, set in the calendar of activities approved by the CEC, district electoral councils (except DEC no. 37 for the left bank of the Dniester and DEC no. 38 for polling stations abroad) established a total of 1,961 polling stations. That number is four more than in the 2024 presidential election.

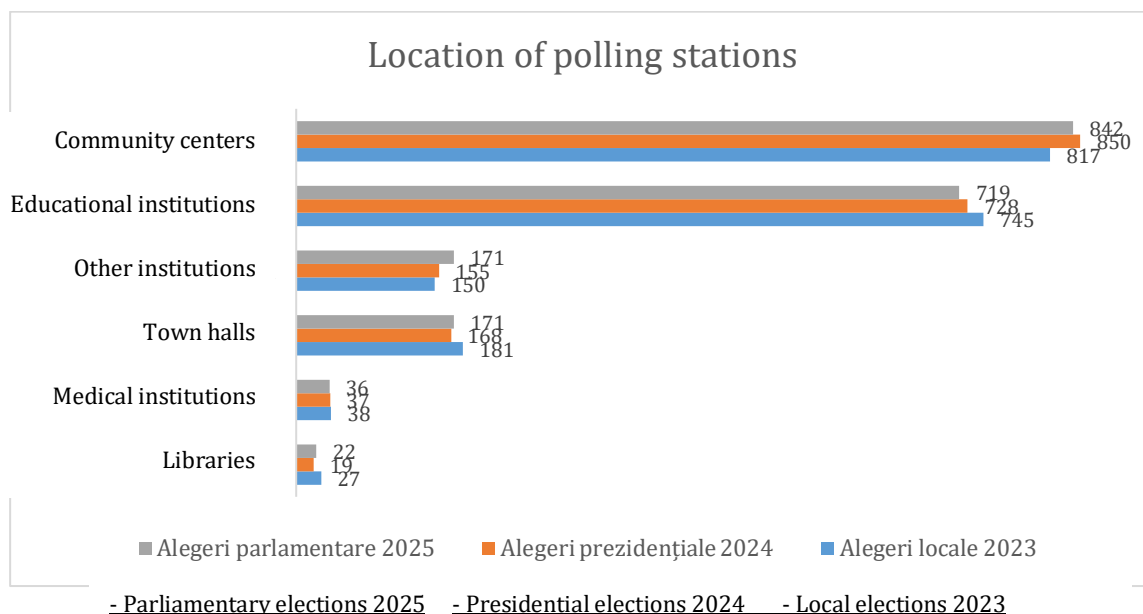
In some electoral districts, the number of polling stations was reduced: one station less in electoral districts no. 10 Causeni, no. 19 Glodeni, and no. 23 Nisporeni, and two stations less in electoral district no. 20 Hincesti. At the same time, the number of polling stations was supplemented by seven in electoral district no. 1 Chisinau, and by one in electoral districts no. 14 Drochia and no. 35 Ungheni.

Examining the DEC decisions on the establishment of 1,961 polling stations in terms of their location, the Promo-LEX OM has found:

- Approximately 91% of the polling stations were opened in premises owned by the state or administrative-territorial units (ATU), or under the management of local public administration authorities;
- Most of the polling stations (about 80%) were located in community centers and educational institutions, including preschool (see Chart 2).

⁹⁰ [CEC Decision no. 3749](#) of 06.08.2025 on the notification of the Orhei Police Inspectorate no. CEC-7/21229 of 31 July 2025.

⁹¹ The offices of DEC no. 1 Chisinau (one case, DEC members were at a training seminar), DEC no. 6 Briceni (one case), DEC no. 37 for the left bank of the Dniester (2 cases, lack of office), and DEC no. 38 for voters abroad (one case, lack of office) were closed during working hours.



Given that an overwhelming proportion (91%) of the polling stations are located in public spaces, we shall draw the attention of the local public administration authorities to the legal obligation to ensure that the premises of the polling stations and access routes to them meet the accessibility requirements provided by the Regulation on the accessibility of the electoral process for persons with disabilities.

In total, 2,274 polling stations were set up for the elections of 28 September, including 12 polling stations for voters from the left bank of the Dniester and 301 polling stations for voters from abroad.

3.5. The work of public administration

Between 31 July and 26 August, Promo-LEX observers visited 550 localities where the local public authority is based.

According to the calendar of activities, the deadline by which the LPA had to establish the minimum number of places for display of electoral materials and the minimum number of places for meetings with voters was 26 August 2025. However, the visits took place before the deadline, which is why many LPAs were still in the process of preparation. Thus, the data presented comprise only an intermediate stage, since a single visit cannot reflect whether subsequently, by the deadline, the authorities succeeded in fulfilling their duties in full.

Adoption of the decision on the provision of spaces for display. 406 town halls (74% of the 550 visited) adopted the decision/order on the provision of spaces for display. Of these, only 62% were displayed in the premises of the LPA.

Adoption of the decision on the provision of premises for meetings with voters. Out of the 550 localities visited, 396 town halls (72%) adopted decisions/orders on providing premises for meetings with voters. Of these, only 60% were displayed in the premises of the LPA.

Of the 396 LPAs that adopted decisions/orders, 293 (74%) offer the premises for meetings with voters for free, and 103 LPAs (26%) set fees ranging from MDL 1.48 to MDL 500 per hour and, respectively, MDL 1,000 and MDL 3,000 per day/meeting. Among the premises offered are: community centers, halls of festivities, educational institutions, parks and squares, stadiums, libraries, meeting rooms of town halls.

3.6. Hindering the work of observers

During the monitored period, the work of Promo-LEX observers was obstructed by acts of intimidation against an observer by a political actor, but also by the refusal and delay of providing electoral information by the authorities (PSA, CEC).

- In the first case, on 24 August 2025, in the context of exercising the duties of observer of the Promo-LEX Observation Mission for the parliamentary elections of 28 September 2025, a LTO was publicly insulted from the scene of the event, and subsequently intimidated in direct discussion by Alexei Lungu, who otherwise showed aggressive behavior, although the observer clearly and repeatedly presented himself as a representative of the Promo-LEX OM.

We qualify such actions as a direct attempt to impede the exercise of observers' duties and a flagrant violation of electoral legislation. The LTO filed a complaint with the police, and the Promo-LEX OM asked the authorities to investigate this case and apply the necessary legal measures to sanction actions of intimidation and obstruction of the observation activity. We shall point out that, at international level, independent observers are recognized as human rights defenders⁹² and therefore enjoy protection in the exercise of their duties.

The Promo-LEX OM appreciates the "Public appeal" launched by the Ombudsman in the context of the parliamentary elections of 28 September 2025, through which they ask, among other things, that the competitors "respect the role of election observers and let them conduct free and independent monitoring, refraining from attacks, intimidation, or discrediting."⁹³

The Code of Conduct for the conduct and coverage of the electoral campaign, proposed by the CEC for signing to electoral competitors and media outlets on 28 August,⁹⁴ contains provisions on respect of the rights of observers and prohibits the use of offensive, discriminatory, or hateful language, as well as any form of intimidation, harassment, or denigration of them. These provisions aim to ensure a transparent, fair, and non-discriminatory electoral process.

- In another case, on 06.08.2025, the Promo-LEX OM submitted to the PSA a request for information of public interest, asking for information, in electronic format, on the factual circumstances, based on which some political parties⁹⁵ were denied registration of changes, as well as a copy of the decisions adopted by the PSA regarding the respective political parties.

On 15.08.2025, the Promo-LEX OM received the PSA's reply, through which the institution communicated that the state registration body issues copies of the records of legal entities according to the fees provided for in the annex to Law no. 220/2007 on the state registration of legal entities and individual entrepreneurs. Accordingly, the Promo LEX OM may not have access to electoral information until it pays the fees indicated by the PSA.

We shall remind that according to art. 88 para. (9) of the Electoral Code, observers have access to electoral information, and the information requested by the Promo-LEX OM has a clear electoral nature, since the changes to the party structure affect participation in elections, the lists of candidates, and the validation of electoral competitors.

At the same time, according to the Law on access to information of public interest,⁹⁶ the communication of information of public interest is free, with the exceptions provided in regulatory acts. In the light of this rule, the information requested by Promo-LEX was to be granted free of charge, because it concerns the activity of a legal entity (political party) registered by the state and implies the transparency of administrative processes, being of public interest.

In this context, we shall remind that the new powers of the PSA in the part related to decisions of refusal, cited above, entered into force recently, on 14.06.2025.⁹⁷

- In the third case, the Observation Mission requested copies of electoral documents from the Central Electoral Commission back on 22.08.2025, and the information was not provided at least until the presentation of this report.

⁹² [The Venice Commission Report](#) on election observers as human rights defenders, adopted in December 2024, and the similar declaration of the UN human rights rapporteurs in 2022

⁹³ [Public appeal](#) of People's Advocates in the context of the parliamentary elections of 28 September 2025.

⁹⁴ [Press release](#). The Central Electoral Commission invites electoral competitors and media outlets to sign the Code of Conduct for the Parliamentary Elections of 28 September 2025.

⁹⁵ Agrarian Party of Moldova, Alternative and Rescue Force of Moldova, Chance Party, Victory Party.

⁹⁶ Art. 22 para. (1) of the [Law](#) on access to information of public interest.

⁹⁷ [Law no. 100/2025](#) on amending some regulatory acts (effective combating of electoral corruption and related aspects).

Hereby, we ask all public institutions involved in electoral processes not to create obstacles in the presentation of electoral information. The provision of this information will contribute to strengthening public trust in state institutions, which have positive obligations in terms of ensuring the transparency of electoral processes.

IV. ELECTORAL COMPLAINTS AND DISPUTES

4.1. Notifications and complaints filed with the CEC

During the observed period, at least six notifications and three complaints were filed with the CEC. They concerned the distribution of leaflets, defamation of electoral competitors, electoral campaigning, intellectual property issues, discriminatory treatment when presenting signatures collecting lists, etc. The term of examination of these notifications varied from 1 to 11 days.

MAN filed 4 complaints/notifications; PAS filed 2 complaints/notifications; and PSDE, PNM, and others filed one notification each. Recently, the CEC has started to publish in the section dedicated to elections⁹⁸ the notifications filed by interested persons, a welcome initiative that responds to a previous recommendation of Promo-LEX. The CEC managed to resolve all the submitted notifications. At the same time, five of them were sent according to the competence to the GPI.

1. On 28.07.25, the CEC registered a notification,⁹⁹ through which PAS informed the central electoral authority about the allegedly illegal actions of PRIM. Thus, violations of “defamation, misuse of the trademark /pas/ by massive distribution of leaflets, posters, brochures containing slanderous messages and distinctive elements of PAS visual identity, including similar fonts, colors, and graphic styles” were alleged.

The CEC issued a reply,¹⁰⁰ explaining the rules for examining actions related to guaranteeing the exercise of the right to free expression and informing the author of the notification about the referral of the notification to the GPI for its examination through the prism of the existence of contravention elements provided for by art. 52 para. (1) and (2) of the Contravention Code.

The CEC chose not to rule on the merits of the requests of the author of the notification in the part related to the use of the registered trademark /pas/ by PRIM, even if it previously did so in other cases that concerned the registration of electoral competitors.¹⁰¹

On the other hand, PRIM representatives used PAS symbols in a protest, where the use of symbols of another party can be considered a form of freedom of expression, protected by art. 32 of the Constitution of the Republic of Moldova and art. 10 of the European Convention on Human Rights. However, this freedom is limited by the obligation to respect the rights of others, including intellectual property rights. Given that both rights/freedoms are not absolute, a proportionality test may be useful in such cases. The use of the PAS symbol for political criticism or parody purposes could be allowed if (1) it does not create confusion as to the origin of the symbol (the public understands that it is being used by another party), and (2) it is clear that the purpose is political criticism, not commercial exploitation.

At the protest, it was visible that the PAS symbol was used by PRIM, so to an objective observer it is sufficiently clear that there are two distinct political parties, and in such circumstances claims of confusion as to the origin of the symbol cannot be held.

At the same time, the use of the PAS symbol was accompanied by political criticism and in no way pursued a commercial interest. We are mentioning this because, under the Law on trademarks,¹⁰² the proprietor of the trademark is entitled to prohibit third parties from using in their commercial activity, without his consent: a) a sign identical with the trademark for products and/or services identical with those for which the trademark is registered; b) a sign that, due to the identity or similarity with the registered trademark and the identity or similarity of the products or services covered by the sign and the trademark, generates the risk of confusion in the consumer’s perception; the risk of confusion also includes the risk of association between the sign and the trademark; c) a sign identical or similar to the trademark for products and/or services different from those for which the trademark is registered, when the latter has acquired a reputation in the Republic of Moldova, and the third person, following the use

⁹⁸ [The section](#) dedicated to the parliamentary elections of 28.09.2025.

⁹⁹ [Notification](#) registered by the CEC under no. CEC-7/21100 of 28.07.2025, filed by PAS against the Heart of Moldova Party.

¹⁰⁰ [The CEC reply](#), registered under no. CEC-8/8209 of 31.07.2025.

¹⁰¹ [CEC Decision](#) no. 2715 of 16.08.2024 on the application of the Together Electoral Bloc for registration to participate in the republican constitutional referendum and the election for the office of President of the Republic of Moldova of 20 October 2024.

¹⁰² Art. 9 para. (1) of the [Law](#) on protection of trademarks no. 230 of 28.07.2022.

of the sign, without justified reasons, takes advantage of the distinctive nature or reputation of the trademark or harms them.

Thus, in the opinion of Promo-LEX, the law protects the proprietor of the trademark, particularly against its use by third parties in commercial and not political activities, otherwise the freedom of opinion and expression of electoral competitors would be affected.

2. On 30.07.2025, MAN filed a complaint, invoking the distribution of leaflets, pre-electoral advertising materials by PAS. By the reply of 13.08.2025,¹⁰³ the CEC clarified that the submitted document is in fact a notification, and given that the electoral bloc is not even registered as an electoral competitor because the candidates for the position of MP have not yet been registered, the electoral bloc cannot at this time file complaints.

All potential violations must be resolved by the competent bodies within limited deadlines, and transparently,¹⁰⁴ regardless of who files the complaint/notification. Otherwise, parties or electoral competitors are placed in conditions of inequality. Here we shall reiterate the opinion expressed earlier,¹⁰⁵ when there were cases in which complaints were found inadmissible only because of the name of the document, or the examination of notifications related to the elections was based on procedures other than those established by the Electoral Code.

Unlike the first case, the CEC did not address the GPI for the examination of the complaint through the prism of the existence of contravention elements provided for in art. 52 para. (1) and (2) of the Contravention Code, although MAN reported on the distribution of pre-electoral advertising materials.

3. On 04.08.2025, Victoria Furtună filed a notification¹⁰⁶ to the CEC, in which she invoked aspects regarding the commission of alleged acts of corruption by the MSU leadership. The CEC, in its reply of 09.08.2025,¹⁰⁷ qualified the circumstances notified by Victoria Furtună as declarative, and the facts described anonymous, without conclusive evidence being brought. However, the CEC suggested the author of the notification to address law enforcement bodies in case of alleged violations concerning persons in leadership positions within Moldova State University.

4. On 07.08.2025, PAS filed a complaint¹⁰⁸ against PSDE on issues of voter corruption, manifested by offering school bags to children from Bucovat village. In its reply,¹⁰⁹ the CEC noted that the document does not meet the condition of a complaint, but represents a petition or notification. At the same time, the CEC informed the complainant that it sent the complaint to the GPI, according to competence.

5. On 11.08.2025, Victor Grosu, contender for the position of Member of Parliament, filed a notification to the CEC.¹¹⁰ The author of the notification mentioned that a female candidate presented the signatures of at least 1,000 supporters with the right to vote, a practice that creates a distinction between female and male candidates, thus citing discriminatory treatment.

Although at the time of writing this report the CEC did not resolve this notification, we shall mention that the state can implement positive actions (reverse discrimination/affirmative action) in its social policies to correct “factual inequities/inequalities” in certain disadvantaged social groups.¹¹¹ Thus, the “discriminatory” condition invoked by the author of the notification is provided for in art. 113 of the Electoral Code and aims to encourage women’s participation in politics.

According to the case law of the Constitutional Court,¹¹² the preferential treatment of women is an affirmative action aimed at the inclusion of women in political life and has the goal of achieving a sex-based balance of representation in the Parliament.

¹⁰³ [The CEC reply](#), registered under no. CEC-8/8352 of 13.08.2025.

¹⁰⁴ [Code of Good Practice in Electoral Matters](#) of the Venice Commission. Guidelines and explanatory report, pt. 3.3.b.

¹⁰⁵ [Report no. 1](#), Promo-LEX Observation Mission for the parliamentary elections of 28 September 2025, p. 15.

¹⁰⁶ [Notification](#) registered by the CEC under no. 7/21353 of 04.08.2025.

¹⁰⁷ [The CEC reply](#), registered under no. CEC-8/8310 of 09.08.2025.

¹⁰⁸ [Complaint](#) registered by the CEC under no. CEC-7/21471 of 07.08.2025.

¹⁰⁹ [The CEC reply](#), registered under no. CEC-8/8322 of 10.08.2025.

¹¹⁰ [Notification](#) registered by the CEC under no. 7/21569 of 11.08.2025.

¹¹¹ Pt. 42 of the [Guide](#) on art. 14 of the European Convention on Human Rights and art. 1 of Protocol no. 12 to the Convention.

¹¹² Constitutional Court’s [Decision](#) no. 101 of 29.06.2021 on inadmissibility of notification no. 148g/2021 on the exception of unconstitutionality of art. 86 para. (2) of the Electoral Code (differential treatment based on gender when registering independent candidates for parliamentary elections).

6. On 13.08.2025, PNM filed a notification to the CEC,¹¹³ asking it to issue a decision on notifying the Ministry of Justice and filing an action to dissolve the ALDE party. The author of the notification claims that Ilan Șor, the leader of the Șor Party, declared unconstitutional, is involved in the organization and functioning of the ALDE party. In its reply,¹¹⁴ the CEC noted that “the finding of circumstances such as the eventual successor status of a political party declared unconstitutional cannot be carried out by a formal act of the Commission, but involves the analysis of and provision of proof for a set of facts and circumstances within the procedure carried out by the Ministry of Justice. Only this authority is empowered by law to assess the merits of those circumstances and, where appropriate, to initiate appropriate legal action.”

7. On 19.08.2025, a representative of MAN filed a complaint,¹¹⁵ in which he invoked the prohibited actions of electoral campaigning and elements of defamation of the candidate for the position of MP Ion Ceban, carried out by PAS. *In concreto*, the complainant reported that on 16 August 2025, a video was posted on PAS’s Facebook page, with the description: “Ivan Ceban did not limit himself to Moldova! In the presidential election in Romania he supported an extremist: Calin Georgescu [...]”

The CEC sent the complaint, according to competence, to the GPI¹¹⁶ for it to issue an opinion on the fact of a contravention provided for in art. 52 of the Contravention Code, at the same time suggesting the complainant to go to court for defamation of the candidate for the position of MP Ion Ceban.

8. On 20.08.2025, a representative of MAN filed a complaint,¹¹⁷ in which he invoked the prohibited actions of electoral campaigning and elements of defamation of the candidate for the position of MP Ion Ceban, carried out by PAS. Thus, the complainant reported that, on 20 August 2025, a picture of Mr. Ion Ceban on the background of the Kremlin was published on PAS’s Facebook page, with the text “Ivan Ceban secretly visited Moscow on the day of Russia’s invasion of Ukraine [...]”

In this case, the CEC did exactly like in the previous case.¹¹⁸

9. On 21.08.2025, a representative of MAN filed a complaint,¹¹⁹ in which he invoked the prohibited actions of electoral campaigning carried out by PAS, manifested in the publication of a message on PAS’s Facebook page with the following content: “Moldova HiTech Park: About MDL 4 billion in Chisinau and 21,600 well-paid jobs by 2030 – the investment of PAS Government [...]” The CEC adopted the same solution as in the case of pt. 7 and 8.¹²⁰

We find that the uniform treatment of complaints no. 7-9 by the CEC, by redirecting them to the GPI and the court, shows a procedural approach, which may also indicate a lack of capacity or tools to directly address such complex cases.

4.2. Disputes examined by the courts

The courts examined at least six disputes during the observed period. The term of examination of such disputes ranged from 1 to 10 days. Most of the electoral disputes related to the registration of electoral competitors, which is typical for the observed period, but there were also cases of applying new mechanisms, such as security measures limiting the activity of political parties.¹²¹

1. On 23.07.2025, Vasile Bolea, the Revival Party, the Chance Party, the Victory Party, and the Alternative and Rescue Force of Moldova Party filed an action to the Central Court of Appeal (CCA) against the CEC. The case concerned the refusal of the CEC to register the Victory Electoral Bloc.¹²²

The CCA examined the case within seven days and found that the action was filed late, declaring it inadmissible,¹²³ while noting in the body of the ruling that the plaintiffs had failed to meet the deadline

¹¹³ [Notification](#) registered by the CEC under no. CEC-7/21664 of 13.08.2025.

¹¹⁴ [CEC Reply](#) no. CEC-8/8527 of 20.08.2025.

¹¹⁵ [Complaint](#) no. CEC-10AP/1 of 19.08.2025.

¹¹⁶ [CEC Reply](#) no. CEC-8/8509 of 20.08.2025.

¹¹⁷ [Complaint](#) no. CEC-10AP/2 of 19.08.2025.

¹¹⁸ [CEC Reply](#) no. CEC-8/8571 of 21.08.2025.

¹¹⁹ Complaint no. [CEC-10AP/3](#) of 21.08.2025.

¹²⁰ [CEC answer](#) no. CEC-8/8582 of 22.08.2025.

¹²¹ The security measure is provided for in art. 21 para. (3³) of the [Law](#) on political parties.

¹²² [CEC Decision no. 3670](#) of 19.07.2025 on the application of the Victory Electoral Bloc for registration to participate in the parliamentary elections of 28 September 2025.

¹²³ [CCA Ruling](#) of 30.07.2025 on the case of administrative litigation.

within which they were to claim their allegedly infringed right. This clarification of the court is unclear, since it itself violated the deadline for examination of the action, because, according to art. 100 para. (1) of the Electoral Code, during the electoral period, the competent authorities shall examine complaints within 3 days from their filing, but not later than voting day. When examining electoral disputes, the courts apply the same deadline, including in appeal proceedings.

It is worth mentioning that, by decision of the Supreme Court of Justice (SCJ),¹²⁴ the solution adopted by the CCA was maintained.

2. On 04.08.2025, the Chance Party president Alexei Lungu, the Alternative and Rescue Force of Moldova Party, and the Victory Party president Vadim Grozavu filed actions against the CEC, requesting the annulment of the administrative acts adopted by the CEC.¹²⁵ The case concerned the exclusion of these parties from the list of political parties that have the right to participate in the parliamentary elections of 28 September 2025, in connection with the adoption by the PSA of decisions on non-registration of changes in the data entered in the State Register of Legal Entities. The court examined the action within 10 days and rejected¹²⁶ as unfounded the actions brought by the Alternative and Rescue Force of Moldova Party, the Chance Party, and the Victory Party, stating that *“the plaintiffs did not prove that the CEC issued an arbitrary act, restricted any fundamental rights, or excluded parties on political or ideological grounds, since, from the circumstances reported, it follows that when issuing the contested act, the CEC applied the law objectively, in conditions of legality and proportionality.”* The SCJ upheld¹²⁷ the CCA decision.

3. On 11.08.2025, the Ministry of Justice filed an action to the CCA against Revival Party, Chance Party, the Alternative and Rescue Force of Moldova Party, and the Victory Party, third parties CEC and SIS, on the dissolution of political parties. The CCA adopted a ruling on the application of the security measure until pronouncement on the merits, and limited the activity of the political parties concerned. The SCJ upheld the ruling of the CCA.¹²⁸ The security measure of this type is a novelty, having been added recently by Law no. 100/2025 on amending some regulatory acts. We shall also mention that the CCA ruling had not been published by the time of writing this report.

4. On 23.08.2025, the Revival party filed an action against the CEC decision¹²⁹ by which it refused to register the list of candidates for the position of MP. Because of the limitation of the party’s activity, which was ordered as a security measure (see the previous pt.), the CEC took note of the CCA’s ruling and rejected the party’s application, arguing that *“the enforceable court act results in unconditional deprivation of the applicant of the right to participate in any type of ballot, which subsequently falls under the constitutional obligation of the Central Electoral Commission to comply with enforceable court acts and, respectively, to refuse registration as an electoral competitor, having no margin of discretion in this regard.”* The court indicated that *“the CEC has the obligation to comply with enforceable court acts and, respectively, to refuse registration as an electoral competitor, having no margin of discretion in this regard.”* We shall mention that the exclusion of a party on the basis of a ruling that applied an interim measure might affect the right to participate in elections, especially if the process on the merits lasts beyond the elections and a solution is ordered other than the one imposed by the security measure.

5. On 22.08.2025, the Centrist Union of Moldova Party filed an action against the CEC decision¹³⁰ by which it refused to register the list of candidates for the position of MP. The court held that *“from the contested administrative act it appears that the CEC retained the incidence of the notion of ‘camouflaged electoral bloc’ in relation to some candidates on the list of the Centrist Union of Moldova (such as Verbițchi Ruslan, Rotari Sergiu, Filip Alexandru, and Roșca Ștefan), on the grounds that they were previously members on the register of the Liberal Democratic Party of Moldova (PLDM). However, such a conclusion is unfounded. In this case, there is no evidence in this regard. The CEC’s retention of the incidence of a ‘camouflaged electoral bloc’ is unfounded, as the existence of a collective and masked participation of the*

¹²⁴ [SCJ Decision](#) of 01.08.2025.

¹²⁵ CEC Decision no. [3742](#) of 03.08.2025 and CEC Decision no. [3651](#) of 14.07.2025.

¹²⁶ [CCA Decision](#) of 14.08.2025 on administrative case.

¹²⁷ [SCJ Ruling](#) of 16.08.2025.

¹²⁸ [SCJ Decision](#) of 25.08.2025.

¹²⁹ [CEC Decision](#) no. 3835 of 21.08.2025 on the application of the Revival Party for registration of its candidates for the position of Member of Parliament of the Republic of Moldova.

¹³⁰ [CEC Decision](#) no. 3826 of 20.08.2025 on the application of the Centrist Union of Moldova Party for registration of its candidates for the position of Member of Parliament of the Republic of Moldova.

PLDM in the elections through the Centrist Union has not been proven. The candidates concerned were nominated by the party, did not have the status of independents, and their mere previous membership in the PLDM does not constitute a legal ground for applying the sanction provided for in art. 68 para. (11) lit. d) of the Electoral Code.”

6. On 25.08.2025, the Greater Moldova Party filed an action with the CCA, requesting the annulment of the CEC decision¹³¹ on refusal to register the list of candidates for the position of MP. The court annulled the CEC decision and ordered the re-examination of the application of the Greater Moldova Party for registration of its candidates for the position of Member of Parliament of the Republic of Moldova. We shall mention that at the time of writing this report the court published only the operative part of the decision.¹³²

It should be noted that at the time of writing this report, several cases were pending at the CCA,¹³³ in respect of which the court had not yet ruled on the merits.

4.3. Activity of law enforcement bodies

During the observation period, the law enforcement bodies communicated about the conduct of several actions concerning the representatives of some political entities and about illegal acts of electoral nature:

- **On 01.08.2025**, the police informed¹³⁴ that one of the vice-presidents of Orhei District was documented by the police for corrupting the participants in the protest of 26.07.2025 in Chisinau, after he financially remunerated some of the people in the office of a political party in Orhei.
- **On 07.08.2025**,¹³⁵ officers of the NII and of territorial subdivisions, jointly with prosecutors of the POCOCSC and with the support of police officers from SPPB “Fulger”, conducted 78 searches in several localities of the country. The actions were carried out as part of a criminal case initiated on the facts of electoral corruption, illegal financing of political parties, and money laundering. Two persons were detained for 72 hours. They already hold the status of defendant in a criminal case examined by the Soroca Court, initiated on the basis of art. 181¹ para. (1) of the Criminal Code – “Electoral corruption.” At that time, the TAITO app, which facilitates communication and interaction within the Șor network, as well as viewing and accessing the PSB (Promsvyaz Bank) account from the Russian Federation, was mentioned in the public space for the first time.¹³⁶
- **On 08.08.2025** the police detained¹³⁷ two foreign citizens who were pasting posters in the capital with content that incited to social, interethnic, and religious hatred. The two men entered Moldova in the morning, and the law enforcement are examining the version that the purpose of their stay on the territory of Moldova was to be actively involved in disrupting the electoral process.

According to the information verified by specialized state institutions, those persons allegedly participated in training camps on mass disorder, organized in Serbia, Bosnia and Herzegovina, during the previous elections and the referendum, about which the National Police and the Security and Intelligence Service had communicated previously.

- **On 10.08.2025**, the police announced¹³⁸ that minutes were drawn up in relation to dozens of people for receiving and offering money in exchange for participation in protests. The police determined that those who protested were offered between MDL 200 and MDL 400, and those who brought the protesters with personal cars were offered between MDL 1,000 and MDL 1,500.
- **On 13.08.2025**, the police announced¹³⁹ that the authorities of Moldova, through the collaboration of the National Police, ANRCETI, and the Security and Intelligence Service, submitted official requests to block 443 TikTok channels (containing thousands of videos), involved in spreading disinformation with impact on national security and social stability. They

¹³¹ [CEC Decision](#) no. 3846 of 23.08.2025 on the application of the Greater Moldova Party for registration of its candidates for the position of Member of Parliament of the Republic of Moldova.

¹³² The [operative part](#) of the CCA decision of 26.08.2025.

¹³³ [Andrei Năstase v. CEC](#), [PLDM v. CEC](#), [MAN v. CEC](#).

¹³⁴ Police press release of [01.08.2025](#).

¹³⁵ Updated police press release of [08.08.2025](#).

¹³⁶ Ministry of Internal Affairs press release of [06.08.2025](#)

¹³⁷ Police press release of [08.08.2025](#).

¹³⁸ Police press release of [10.08.2025](#).

¹³⁹ Police press release of [13.08.2025](#).

also detected 12 channels that spread false information about alleged preparations to rig the parliamentary elections in Moldova, seven of which were blocked.

- **On 16.08.2025**, the police announced about the organization of an unauthorized protest. The police drew up about 150 minutes on contravention, of which 60 for corruption related to organized meetings.

At the same time, representatives of some political parties also invoked alleged actions of abuse by law enforcement bodies:

- **On 03.08.2025**, Vasile Costiuc made public a case¹⁴⁰ in which he mentioned that the police, being notified anonymously, came to a meeting of the inhabitants of Bumbăta village, Ungheni district with the president of the Democracy at Home Party Vasile Costiuc.
- **On 11.08.2025**, PRIM reported¹⁴¹ about a case of seizure of two street tents and 800 party newspapers, accusing the police of abuse.
- **On 16.08.2025**, the PSRM made public¹⁴² a case in which it mentioned that the police detained a vehicle with the party's newspapers in Vulcanesti.

Regarding public meetings, we shall remind that art. 40 of the Constitution and art. 11 of the ECHR¹⁴³ guarantee freedom of assembly. However, this right is not absolute and may be subject to certain restrictions, as provided for in art. 54 para. (2) of the Constitution.¹⁴⁴ Thus, citizens can participate in meetings with representatives of political parties as long as no illegal activities are carried out in these meetings (e.g. acceptance of money for participation in organized meetings, use of weapons of any type, electoral campaigning outside the time of the actual electoral campaign, and so on). On the other hand, according to art. 28 para. (1) pt. 1) lit. b) of the Electoral Code, "[...] The Ministry of Internal Affairs ensures the security and public order in the places and premises of meetings of electoral competitors or other subjects with voters in the territory, including from the perspective of compliance with public health measures."

We shall mention that the appearance of the police at the meetings of citizens with representatives of political parties could be regarded as excessive intervention, especially in cases where such interventions are based on the police taking action on the basis of anonymous calls. We shall remind that the legislator established the possibility of state agents taking action based on an anonymous notification only in the case of crimes, at the start of a criminal trial,¹⁴⁵ not in the case of contraventions.¹⁴⁶ We shall hereby draw attention to the fact that in the electoral process, an anonymous notification could be used by electoral competitors as a tool for pursuing and putting pressure on political opponents.

¹⁴⁰ [Meeting](#) of the inhabitants of Bumbăta village, Ungheni district with the president of the Democracy at Home Party Vasile Costiuc, published on 03.08.2025 on Facebook.

¹⁴¹ [News reports](#) showing the seizure of two street tents and 800 party newspapers.

¹⁴² [News report](#) invoking the detention of a vehicle with PSRM's newspapers.

¹⁴³ [European Convention](#) on Human Rights.

¹⁴⁴ The exercise of rights and freedoms may not be subject to restrictions other than those provided for by law, which correspond to the unanimously recognized norms of international law and are necessary in the interests of national security, territorial integrity, economic well-being of the country, public order, for the prevention of mass disorder or crimes, for the protection of the rights, freedoms, and dignity of other persons, for the prevention of disclosure of confidential information, or for guaranteeing the authority and impartiality of justice.

¹⁴⁵ Art. 263 para. (8) of the [Code of Criminal Procedure](#).

¹⁴⁶ Art. 440 para. (2) of the [Contravention Code](#).

V. NOMINATION AND REGISTRATION OF ELECTORAL COMPETITORS

5.1. Registration of electoral blocs

According to pt. 29 of the calendar of activities, the registration of electoral blocs for the nomination of candidates for the position of Member of Parliament took place between 20 June and 19 August 2025. During the monitored period, three applications for registration of electoral blocs were registered and examined by the CEC.

The Patriotic Electoral Bloc of Socialists, Communists, Heart, and Future of Moldova. On 29 July 2025, the application and the set of documents for the registration of an electoral bloc for participation in the parliamentary elections of 28 September 2025 were submitted to the CEC. The application was submitted by three political parties: the Party of Socialists of the Republic of Moldova, the Heart of Moldova Republican Party, and the Future of Moldova Political Party. Following the examination of the application at the CEC meeting of 3 August 2025, the Patriotic Electoral Bloc of Socialists, Heart, and Future of Moldova was registered by CEC Decision no. 3729.¹⁴⁷

Subsequently, on 5 August 2025, the Party of Communists of the Republic of Moldova informed the CEC about accession to the aforementioned electoral bloc, presenting the application and the set of documents in order to register amendments to the agreement on the establishment of the bloc. Thus, following the examination of the application, the CEC approved CEC Decision no. 3760¹⁴⁸ of 8 August 2025, by which PCRM was included into the electoral bloc, with changes to the electoral symbol and the name of the bloc: Patriotic Electoral Bloc of Socialists, Communists, Heart, and Future of Moldova (Patriotic EB).

Together Electoral Bloc. On 6 August 2025, the CEC received the application and the set of documents for the registration of the Together Electoral Bloc from two political parties: the Party of Change and the Ecologist Green Party. At the meeting of 8 August 2025, the Commission approved by CEC Decision no. 3761¹⁴⁹ the registration of the electoral bloc, the electoral symbol, the way of its representation, and the particularities of participation in elections (Together EB).

National Unity Electoral Bloc. The Party of National Reunification “At Home” and the National Liberal Party submitted to the CEC the application and the set of documents for the registration of the Bloc of National Union as an electoral bloc on 8 August 2025. In the process of examining the request, a lawyers’ office notified the CEC that the name Bloc of National Union [*Blocul Unității Naționale*] is a national trademark registered in the name of an individual with the State Agency for Intellectual Property. Consequently, the constituent parties decided to change the name to National Unity Bloc [*Blocul Unirea Națiunii*], removing the reported non-compliance. Thus, by CEC Decision no. 3780¹⁵⁰ of 13 August 2025, the National Unity Electoral Bloc (BUN EB) was registered.

Since the deadline for registration of electoral blocs expired on 19 August 2025, we find that four electoral blocs were registered for participation in this election: Alternative EB¹⁵¹, Patriotic EB, Together EB, and BUN EB. In total, during the period of registration of electoral blocs, the Commission examined five applications for registration and one application for accession. We shall remind that the CEC rejected an application for the registration of an electoral bloc, namely the Victory EB.¹⁵²

Compared to the early parliamentary elections of 11 July 2021, a larger number of electoral blocs was registered for these elections, which indicates an increased interest of political parties to participate in elections through political associations. We shall remind that two electoral blocs participated in the elections of 2021: the Electoral Bloc of Communists and Socialists, and the Renato Usatii Electoral Bloc.

¹⁴⁷ [CEC Decision no. 3729](#) of 03.08.2025 on the application of the Patriotic Electoral Bloc of Socialists, Heart, and Future of Moldova for registration to participate in the parliamentary elections of 28 September.

¹⁴⁸ [CEC Decision no. 3760](#) of 08.08.2025 on the application of the Patriotic Electoral Bloc of Socialists, Communists, Heart, and Future of Moldova for registration to participate in the parliamentary elections of 28 September.

¹⁴⁹ [CEC Decision no. 3761](#) of 08.08.2025 on the application of the Together Electoral Bloc for registration to participate in the parliamentary elections of 28 September.

¹⁵⁰ [CEC Decision no. 3780](#) of 13.08.2025 on the application of the National Unity Electoral Bloc for registration to participate in the parliamentary elections of 28 September.

¹⁵¹ Alternative EB: MAN, PDCM, CC. Details in [Report no. 1](#) of the Observation Mission for the parliamentary elections of 28 September 2025, p. 19.

¹⁵² Details in [Report no. 1](#) of the Observation Mission for the parliamentary elections of 28 September 2025, p. 19.

5.2. Nomination and registration of electoral competitors

According to art. 112-113 of the Electoral Code no. 325/2022 and the provisions of the Regulation on the particularities of nominating and registering candidates for parliamentary elections¹⁵³ (hereinafter the Regulation on nominating and registering candidates), the following subjects have the right to nominate candidates for elections: political parties that have the right to participate in elections based on the data presented by the PSA, registered electoral blocs, and citizens of Moldova who put themselves forward as a candidate.

According to the provisions of pt. 35 of the calendar of activities, the submission of documents for the registration of candidates for the position of Member of Parliament of the Republic of Moldova took place between 20 July and 19 August 2025. During this period, the CEC received applications and files for the registration of candidates from 4 electoral blocs, 21 political parties, and 7 independent candidates.

Independent candidates. To be registered, an independent candidate must submit signatures collecting lists (hereinafter SCL) containing the signatures of at least 2,000 and no more than 2,500 supporters with the right to vote. By way of derogation from this provision, a female candidate must submit the signatures of at least 1,000 and no more than 2,500 supporters with the right to vote. Also, the collection of signatures can be ensured through the “Electronic Signatures Collecting List” Information Subsystem. We shall note that the ESCL ISS was launched before the presidential election and the republican constitutional referendum of 2024.

During the period of nomination and registration of candidates, the CEC received 21 applications from potential independent candidates, of which only 3 candidates requested the establishment of initiative groups in order to collect the signatures of supporters, and, respectively, 18 decided to collect the required number of signatures by themselves (see Table 5).

Table 5. Requests for registration of initiative groups

No.	Name	Date of application to the CEC	Date of examination at the meeting	No. of IG members	Status
1.	Olesea Stamate	20.07.2025	22.07.2025	10	Registered, CEC Decision no. 3671
2.	Andrei Năstase	20.07.2025	22.07.2025	55	Registered, CEC Decision no. 3672
3.	Oleg Bolotnicov	07.08.2025	10.08.2025	11	Registered, CEC Decision no. 3775
					SCL returned without request for registration. (19.08.2025)

Of the 21 applications, 6 (29%) were submitted by female candidates and 15 (71%) by male candidates, respectively. Signatures collecting lists were issued to 20 contenders for the position of independent candidate, and one of the applicants (Roman Emilianov) did not pick up the lists.

Of the 20 contenders who collected the signatures of supporters, only 7 submitted registration files to the CEC, and 2 of them collected signatures through initiative groups, while 5 collected signatures by themselves. Of the 13 contenders for the position of independent candidate who did not apply for registration, only 10 returned the signatures collecting lists to the CEC (see Table 6).

¹⁵³ [Regulation](#) on the particularities of nominating and registering candidates for parliamentary elections, approved by CEC Decision no. 1204/2023.

Table 6. Requests for the issuance of signatures collecting lists (SCL)

No.	Name	Date of application to the CEC	Status
1.	Eleonora Rusu	20.07.2025	SCL were not returned.
2.	Sergiu Rența	20.07.2025	SCL returned without request for registration. (14.08.2025)
3.	Natalia Clevadi	21.07.2025	File submitted for registration.
4.	Victoria Sanduța	21.07.2025	File submitted for registration.
5.	Victor Grosu	21.07.2025	SCL were not returned.
6.	Nicolae Urîtu	22.07.2025	SCL returned without request for registration. (19.08.2025)
7.	Marcel Darie	23.07.2025	SCL returned without request for registration. (13.08.2025)
8.	Dina Carpinschi	23.07.2025	File submitted for registration.
9.	Stepan Savițchi	24.07.2025	SCL were not returned.
10.	Alexandru Țvetarnii	28.07.2025	SCL returned without request for registration. (15.08.2025)
11.	Valentin Vinnincenco	29.07.2025	SCL returned without request for registration. (18.08.2025)
12.	Uliana Bideac	04.08.2025	SCL returned without request for registration. (19.08.2025)
13.	Tatiana Crețu	04.08.2025	File submitted for registration.
14.	Igor Ianac	04.08.2025	File submitted for registration.
15.	Roman Oglindă	05.08.2025	SCL returned without request for registration. (18.08.2025)
16.	Sergiu Ungureanu	06.08.2025	SCL returned without request for registration. (19.08.2025)
17.	Roman Emilianov	09.08.2025	Did not pick up SCL.
18.	Victor Brăileanu	11.08.2025	SCL returned without request for registration. (19.08.2025)

Compared to the early parliamentary elections of 2021, when only 2 applications for registration of independent candidates were examined, for these elections we find an increase in citizens' interest to run independently. Likewise, we see the increase in the share of women who run independently (5 out of the 7 applications for registration).

Verification of signatures collecting lists. The CEC verified the signatures of supporters collected in support of 7 independent candidates. The signatures collection period ranged from 9 to 29 days.

According to the provisions of pt. 165.1 of the Regulation on the establishment and registration of IGs and the preparation, presentation, and verification of signatures collecting lists, approved by CEC Decision no. 3641/2025, the electoral body shall verify signatures collecting lists within 5 days of receiving them. Following the analysis of the CEC decisions on the examination of applications for registration of independent candidates, we find that on average, about 13% of the signatures verified by the CEC were declared invalid.

Table 7. Signatures collecting lists submitted by IC

No.	Candidate	Collection period	Verified signatures	ESCL ISS signatures	Valid signatures	Invalidated signatures	Invalidation percentage
1.	Andrei Năstase	9 days	2,311	34	2,164	148	6.4%
2.	Olesea Stamate	15 days	1,221	88	1,112	109	8.9%
3.	Victoria Sanduța	25 days	1,104	180	1,066	38	3.4%
4.	Dina Carpinschi	26 days	1,178	10	908	270	22.9%
5.	Natalia Clevadi	29 days	66	36	65	1	1.5%
6.	Igor Ianac	15 days	2,342	-	1,816	526	22.4%
7.	Tatiana Crețu	15 days	1,212	4	1,107	105	8.6%

Applications for registration and lists of candidates. A political party or electoral bloc shall submit the list of candidates, which shall not be less than 51 persons and shall not exceed the number of 111 persons. The lists of candidates for the parliamentary elections shall be drawn up respecting the minimum representation quota of 40% for both sexes. The positioning of candidates on the lists is made according to the formula: at least four candidates for every ten seats. In order to be registered, candidates from the lists of political parties, electoral blocs, and independent candidates personally submit documents to the CEC.

During the nomination and registration period, the CEC examined at meetings 27 applications for the registration of candidates for the position of MP from 4 electoral blocs and 21 political parties.¹⁵⁴ In the case of two political parties, PPDA and PR, the CEC repeatedly examined their applications, because PPDA submitted two applications for registration, the first being rejected, and the application for registration submitted by PR was examined at two CEC meetings, since at the first examination of the file, the draft decision did not meet the required number of votes (see Annex no. 2).

Some electoral competitors reported difficulties in the process of nominating and registering candidates. They included the obligation for candidates to personally submit certain documents, an aspect that complicates and slows down the procedure; the modification by the CEC of the program for receiving applications during the nomination period; as well as the high degree of bureaucratization, accentuated by the lack of possibility to submit some documents in electronic format. These elements, as a whole, may limit the accessibility and predictability of the electoral process for competitors.

Following the examination of the applications for registration of candidates, the lists of candidates were registered for the electoral race from 4 electoral blocs (Patriotic EB, Alternative EB, Together EB, BUN EB), 13 political parties (PAS, PPDA, CUB, ALDE, PPNM, PSDE, MRM, LOC, AUR, PAM, PL, UCSM, PN), and 4 independent candidates (Andrei Năstase, Olesea Stamate, Victoria Sanduța, Tatiana Crețu).

In the case of PDMM, by the time of preparing this report – 28.08.2025, the CEC did not make a decision, because the proposed draft decision did not meet the required number of votes, and thus the registration file was sent to another member-rapporteur. Thus, the 7-day period established in the Electoral Code for registration or refusal (art. 68 para. (5)) was exceeded.

On the day of the meeting in which the application for registration of the PDMM was examined, the PSA sent a notification¹⁵⁵ regarding the temporary withdrawal of the PDMM from the updated list of political parties, arguing that on 19.08.2025 it received data and information revealing the activity of the said party in ways contrary to the law, which requires the re-examination of data and information from the register of members of the party in question.

In this context, we shall remind that on 22.08.2025, the Official Gazette¹⁵⁶ published the order¹⁵⁷ of the director of the Security and Intelligence Service (SIS), which completed the *List of persons for whom there is evidence, documented information that they are associated with the subjects of restrictions*, adding to it a number of persons, including Vladimir Cebotari, one of the leaders of the PDMM, but also companies controlled by him.

Refusals of registration. The CEC rejected applications for registration from 8 political parties and 3 independent candidates for the following reasons:

- Non-compliance with the procedure for nominating a sufficient number of candidates (PPDA, PPN, MPSH);
- Limitation of activity of a party by ascertaining its status of successor of a political party declared unconstitutional (PR);
- Exclusion from the list of candidates of persons who do not meet the conditions of nomination, which led to the decrease of the minimum representation quota of 40% for both sexes (PPMM, NOI: the nominated candidates have eligibility restrictions, according to art. 16 para. (2) lit. c) of the Electoral Code; UCM: the nominated candidates have another political affiliation);
- Failure to comply with the statutory provisions on the nomination of the list of candidates (PONA);
- Submission of insufficient number of signatures to be registered as IC (Dina Carpinschi, Natalia Clevadî, Igor Ianac).

¹⁵⁴ Some political parties (PPN, PONA) submitted to the CEC applications for registration and subsequently withdrew them, registering other applications in this regard. Also, at the last meeting of the CEC, an [application](#) for registration was submitted by a political party not included in the list approved by the Commission – the Social-Political Movement of Roma.

¹⁵⁵ [Notification](#) of the PSA on the temporary withdrawal of the PDMM from the updated list of political parties, dated 25.08.2025

¹⁵⁶ Official Gazette [no. 445-447](#) of 22.08.2025.

¹⁵⁷ SIS director's [order](#) no. 53 of 21.08.2025 on amending the order of the director of the Security and Intelligence Service of the Republic of Moldova no. 2/2024.

Modification of lists of candidates. According to art. 15 of the Electoral Code no. 325/2022, electoral competitors have the right to request, before the start of the electoral campaign, the replacement of a candidate from the registered list by withdrawing him and nominating another candidate and/or by adding to the list of candidates. Likewise, competitors have the right to request, at least 10 days before voting day, the change of place of order or the exclusion of a candidate from the registered list or the withdrawal of the entire list of candidates.

During the monitored period, the CEC examined 9 requests for modification of the list of candidates from 5 electoral competitors: PPDA (5 applications), PAS (1 application), CUB (1 application), Patriotic EB (1 application), and Together EB (1 application). The electoral competitors requested withdrawing and replacing some candidates, adding to the number of candidates, and changing the order of candidates. In this regard, the CEC adopted 7 decisions, 3 of which concerned the PPDA.

Thus, according to the lists of candidates submitted by electoral competitors, including the latest changes, and the lists of registered independent candidates, 1,248 candidates are registered for the position of MP, of whom 556 (44.5%) are women and 692 (55.5%) are men. Given the total number of 101 MPs who will enter the Parliament, it follows that about 12 candidates are competing for one seat.

VI. PERFORMANCE OF POTENTIAL ELECTORAL COMPETITORS

6.1. Activities observed in the process of collecting signatures by IGs / independent candidates

The process of collecting signatures by the 21 persons who expressed their intention to register as independent candidates for the position of MP was little visible both in the public space (physical) and online, because of which Promo-LEX could not estimate the expenses for signature collection activities by independent candidates (observed activities were very few).

Promo-LEX observers reported at least 31 signature collection activities for 8 electoral competitors, as follows: Olesea Stamate's IG (9), Victoria Sanduța (6), Dina Carpinschi (5), Sergiu Rența (3), Uliana Bideac (3), Sergiu Ungureanu (3), Roman Oglindă (1), and Igor Ianac (1). Of these, only 2 were registered by the CEC – Olesea Stamate and Victoria Sanduța, while 4 returned the signatures collecting lists without requesting registration (Sergiu Rența, Uliana Bideac, Sergiu Ungureanu, and Roman Oglindă), and 2 had their registration rejected (Dina Carpinschi and Igor Ianac).

In the case of another candidate – Andrei Năstase's IG, no signature collection activities were observed; instead, at least 60 sponsored posts published by him in social networks were observed during the signature collection period (22-31 July 2025).

We reiterate that in the case of independent candidates, only 3 formed initiative groups for collecting signatures for signatures collecting lists (Olesea Stamate, Andrei Năstase, and Oleg Bolotnicov), while the rest opted for collecting them by themselves. Out of the 21 potential independent candidates, as a result of presenting the signatures collecting lists with sufficient signatures, as well as in line with the legal framework, the CEC registered only 4 ICs (Andrei Năstase, Olesea Stamate, Victoria Sanduța, and Tatiana Crețu).

6.2. Promotion activities with electoral implications

According to the law, the electoral campaign is to start for all registered competitors on 29 August 2025¹⁵⁸ (30 days before voting day), and shall end either on the Friday before voting day or on the date of cancellation of the registration of the electoral competitor. Electoral campaigning includes appeals, statements, as well as information dissemination actions that aim to induce voters to cast their votes for a certain electoral competitor. Therefore, we find that there is no express obligation for such actions, appeals, or statements to contain the word "vote".

Compared to the parliamentary elections of 2021, the provisions of the current electoral code provide for an equal term for all electoral competitors in which they can carry out electoral campaigning.¹⁵⁹ For the parliamentary elections of 28 September 2025, the first electoral competitor was registered on 27.07.2025, i.e. two months before voting day, and the last one was to be registered no later than 28.08.2025, when the full list of registered candidates should have been published.¹⁶⁰

Despite the new provisions regarding the electoral campaign, during the monitored period, Promo-LEX observers reported at least 2,339 activities with electoral implications (see Table 8). Through them, various subjects carried out activities to promote their/some political entities, their achievements, as well as visions of further development of the state, but also to denigrate other political entities or to promote negative aspects related to the functioning of state institutions.

Of the total observed activities, most (71%) were distribution of information materials (newspapers, leaflets, flyers, calendars, etc.), 19% were dissemination of street and online advertising, and 6% were meetings with voters. In terms of organizers, the most activities were observed in the case of the Patriotic EB – 57%, PAS – 23%, and MRM – 5%.

¹⁵⁸ [Calendar of activities](#) for organizing and conducting the parliamentary elections of 28 September 2025.

¹⁵⁹ Previously, according to the Electoral Code of 1997 (valid until 2022), the electoral campaign could be carried out immediately after the registration of the electoral competitor, and not only in the 30 days before voting day, as the new Code provides.

¹⁶⁰ At present, the CEC decisions refusing the registration of UCM and PPMM have been successfully challenged, and the CEC is to re-examine the applications for their registration. Also, the CEC is to examine repeatedly the application for registration of the PDMM.

Table 8. Activities with electoral implications observed during the monitored period

Observed activities with electoral implications	Patriotic EB	PAS	MRM	PAM	PN	PSDE	PPMM	Victory PB	LOC	PPDA	Alternative EB	ALDE	CUB	PDMM	Together EB	UCM	Total
Distribution of information materials	1,135	344	56	66		14	20	1	10		8		3				1,657
Dissemination of street advertising	119	44	31	22	25	19	1		4		1		1				267
Dissemination of online advertising	16	90	10	6	24	7	3		10	7	3	9	3	2	2		192
Meetings with voters	31	62	11		7	1	13		3	17	6						151
Protests / flash mobs	12							24				1					37
Press conference / live broadcasts	10			5				2			3			1		1	22
Other	3	4					2	4									13
Total	1,326	544	108	99	56	41	39	31	27	24	21	10	7	3	2	1	2,339

In the case of meetings with voters, most of the times they were reflected as working visits to the territory or meetings with the staff/supporters of the political entities in the regions. However, the delivered messages, as well as the format of dissemination/distribution of information, clearly reflected activities aimed at the electoral promotion of the organizers in the context of the parliamentary elections.

Thus, for example, in the case of the Patriotic EB, in the context of meetings with voters, participants are told about the need to vote, as well as to “take down the yellow government” and give “a vote for” the development of the state.¹⁶¹

Almost the same rhetoric is promoted at the events organized by PPMM – emphasizing the denigration of the current government – how they stole the language of Moldovans, how they rewrote history, how they try to replace the church, how the current leadership continues to divide citizens into theirs and others, etc.

In another case, PAM distributed its electoral program in several town halls around the country.¹⁶² In the case of PPDA, the leader of the party, in a live broadcast on social networks on 22 August 2025, published and supported the statements of a voter regarding her intention to “vote for Vasile Costiuc, who is second” on the list for the parliamentary elections.¹⁶³

In the case of PAS, meetings with voters were conducted by the candidates registered on the party’s list, including those who hold the position of ministers/secretaries of state, in the form of meetings in the context of working trips in the territory. At them, voters are informed about the achievements of “PAS government”, future projects, as well as the necessity and importance of maintaining the European course of the state (given that the slogan used in the campaign is “EU 2028”).

A particular attention was attracted by the public group on social networks “Vote PAS on 28 September, for a European Moldova.” The current name of the group was changed on 30 July 2025 (previously it was named “Support Maia Sandu in the second round on 3 November 2024!”). The moderators of the group include Mihaela Zaporozjan (PAS member, TO Cricova), Igor Boldescu (Chisinau municipal councilor, PAS faction, member of PAS Cricova).

Members of this group are Vladimir Bolea, PAS vice-president, minister of infrastructure and regional development; Roman Roșca, PAS MP, candidate registered on the PAS list; Dumitru Alaiba, PAS member; Ion Melnic, Mihail Briceag, Irina Baran – Chisinau municipal councilors, PAS faction; etc. Since the group changed its name, it had publications by the above persons about the achievements of “PAS government”, projects implemented on public money, meetings in the territory, etc.

In the context of the above, we find that despite the fact that the electoral campaign is to start on 29 August 2025, de facto the promotion activities started much earlier, being camouflaged as political

¹⁶¹ See the event organized by the Patriotic EB on 22 August in [Cantemir](#).

¹⁶² Distribution of information materials by [PAM](#).

¹⁶³ The live video posted by Vasile Costiuc, [PPDA](#), on social networks.

promotion activities or reporting on the achievements of the last four years (since the 2021 parliamentary elections). For this reason, we conclude that the financial expenses actually incurred for the purpose of electoral promotion will be much higher than the expenses that will be declared by electoral competitors.

According to the law, the financial expenses incurred by political entities in the period of 01.07.2025 – 28.08.2025 (before the start of the electoral campaign) are to be reported to the CEC in January 2026, in the context of the presentation of financial reports for the second semester of 2025, when the newly elected legislature is already to be in place.

Based on the above, given that the source of the financing of political entities, as well as the expenses incurred by them for activities before the electoral campaign, disguised as political promotion activities, constitute information of public interest, *we consider it necessary for the CEC to identify measures (including by amending the existing legal framework, if necessary) that would ensure the transparency of the financing of the political parties participating in elections before the start of the electoral campaign.*

6.3. Use of administrative resources

According to the law,¹⁶⁴ candidates are prohibited to use administrative resources during the electoral period. These can be “the human, financial, and material resources which are equally available to persons holding elected offices, persons in positions of responsibility, and civil servants, and which derive from these persons’ control over the staff, financial resources, and allocations from the national public budget, from access to public facilities, or from the administration by these persons of movable and immovable property that is part of the public domain of the state or of administrative-territorial units.” Such violations shall be sanctioned.¹⁶⁵

According to Promo-LEX, the definition of administrative resources in the legal framework is not as exhaustive as the one formulated by the Venice Commission,¹⁶⁶ for which reason it recommended and promoted the adoption of the latter. Therefore, in the process of election observation, the Promo-LEX mission is guided by the recommendations developed by the international authority on this topic.¹⁶⁷

In the same context, we shall remind that by the *Document of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE (OSCE)* of 29.06.1990¹⁶⁸, member states have undertaken to ensure *clear delimitation between the state and political parties; in particular, political parties cannot be confused with the state.*

During the observation period, at least 40 cases were identified that can be qualified as misuse of administrative resources, of which 30 cases concerned PAS, 4 cases – Patriotic EB, 2 cases – PSDE and LOC each, one case – MRM and PPDA each (see Annex no. 3). These cases concerned the involvement of public employees in political/electoral activities during working hours (including for signing the application to the CEC to be registered as a candidate) – 28 cases, as well as the use of local public authorities for political/electoral promotion – 12 cases.

In the case of PAS, there have been situations of involvement of mayors/town halls in the promotion activities with electoral implications by organizing the so-called general meetings of residents in order to present the activity report. By chance or not, it was noticed that these events coincide as a form of organization / agenda with information in the Communication guide “Together we take care of the future of Moldova,” elaborated by PAS in 300 copies on 20 May 2025 (see Annex no. 4). In this respect, we shall mention that in an interview offered by Igor Grosu, president of PAS,¹⁶⁹ to a media outlet, he said that out of the 896 town halls, 324 mayors are PAS’s.

¹⁶⁴ Art. 54 para. (6) lit. e) and art. 70 para. 6 of the Electoral Code.

¹⁶⁵ Art. 48¹ para. (7) of the [Contravention Code](#) of the Republic of Moldova and art. 181² para. (2) of the [Criminal Code](#) of the Republic of Moldova.

¹⁶⁶ [Report](#) of the Venice Commission on the misuse of administrative resources during electoral processes, Strasbourg, 16 December 2013.

¹⁶⁷ “Administrative resources are human, financial, material, in natura and other immaterial resources enjoyed by both incumbents and civil servants in elections, deriving from their control over public sector staff, finances and allocations, access to public facilities as well as resources enjoyed in the form of prestige or public presence that stem from their position as elected or public officers and which may turn into political endorsements or other forms of support.”

¹⁶⁸ [Document](#) of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE (OSCE) of 29.06.1990, pt. 5.4.

¹⁶⁹ [Answers](#) of Mr. Igor Grosu to the questions of investigative journalists.

In the same context, for the monitored observation period, we found the intensification of trips to the territory of the ministers who, at the same time, are also candidates in the PAS list.

Thus, for example, the minister of environment Sergiu Lazarencu, between 28 July and 26 August 2025, visited at least 10 districts (respectively, several localities), where he had meetings with citizens, including public sector employees, during working hours. At those meetings they discussed achievements in environmental area, challenges and future projects. At the same time, in several of these trips, reflected as work trips, the official was accompanied by one PAS MP, candidate registered in the PAS list (for example, Larisa Novac – member of the Parliamentary commission on culture, education, research, youth, sports, and the media; Artemie Cătănoi – member of the Commission on legal issues, appointments, and immunities, etc.).

In the context of the above, we reiterate that the misuse of administrative resources in elections violates the chances of other potential electoral competitors to compete on an equal footing and undermines the voters' right to choose without being unduly influenced. Therefore, we recommend electoral competitors to comply with the provisions of the legal framework on administrative resources and to ensure clear delimitation between the state and political parties, so that political parties are not confused with the state.

6.4. Activities with potential to corrupt voters

During the monitoring period, Promo-LEX observers reported at least 5 cases with potential to corrupt voters, of which 2 cases concerned PPDA and one case concerned the Patriotic EB, Victory PB, and PSDE each.

On 26 July 2025, the Patriotic EB organized a protest titled “For Moldova” in the center of Chisinau. As a result, police representatives announced that they documented several cases in which participants were paid to protest, including 5 people from Floresti and 13 people from Orhei, reported by Promo-LEX observers.

On 4 August 2025, PSDE president Tudor Ulianoschi attended the patron saint holiday in Bucovat town of Straseni district. On the occasion of the event, he allegedly made a donation of about 15 school bags for each child from the locality who will start first grade in the 2025-2026 school year.¹⁷⁰

On August 4, 2025, a promotional video was posted on the Facebook page of the Democracy at Home Party, featuring the registered PPDA candidates, Dinu Tudos and Ion Pralea, who talk about the “Farmers’ Force” Association’s campaign. Through this campaign of solidarity among farmers, the farmers from Cahul district would support their colleagues from Căușeni district with cereals (for the autumn sowing).¹⁷¹

On 11 August 2025, Ilan Șor, leader of the Victory PB,¹⁷² in a video broadcast online, said that he would offer USD 3,000/month for participants in anti-government protests in Moldova. To this end, Șor urged voters to “come out on Saturday (16.08.2025), at 15:00, to the Great National Assembly Square. And stay there for as long as it takes, to remove this yellow mold. For the time you won’t be able to work, I’ll pay your salary. 3,000 dollars – this must be the minimum monthly income of each citizen. Every day, each person who joins the protest will receive 3,000 dollars on account – the equivalent for a month of work.”

On 22 August 2025, in a live on social networks, Vasile Costiuc, candidate registered in the PPDA list, promised a voter from Ecaterinovca village of Cimislia district, after her statement that she would vote for him, that he would buy her an electric tricycle and groceries.¹⁷³

6.5. Involvement of third parties in the electoral process

During the period of monitoring the financing of political parties and electoral campaigns, Promo-LEX observed individuals and legal entities that apparently had no legal ties with political parties/electoral competitors and/or do not run in elections – the so-called “third parties”, who engaged in political/electoral promotion activities for or against political parties/competitors, or on specific topics

¹⁷⁰ Tudor Ulianoschi, [PSDE](#), with the people of Bucovat, at the town’s patron saint holiday.

¹⁷¹ [About](#) the Farmers’ Force Association and their support.

¹⁷² See Ilan Șor’s address distributed on the [Telegram](#) channel.

¹⁷³ [Grandmother](#) Maria from Ecaterinovca of Cimislia district received 5,000 lei back from those who brought half of the purchased wood.

associated with parties/electoral competitors. Instead of making direct donations to political parties and/or electoral competitors, they spread information directly to the public. These activities have a significant impact on the political and electoral processes in the country, including in that the financial expenses incurred by these “third parties” are not regulated and, therefore, are not reported or controlled in any way.

According to the Venice Commission,¹⁷⁴ the concept of “third party” includes a wide range of entities – from those set up by political parties themselves as a way of circumventing party funding regulations (set limits, transparency and reporting of funding sources, etc.), to entities that are completely independent of political parties, which wish to promote a political party/electoral competitor or address a particular issue/situation promoted by a party/electoral competitor (e.g. health or emigration).

A policy paper developed and published by Promo-LEX analyzed this phenomenon in Moldova and offered recommendations to regulate political and electoral financing by “third parties”.¹⁷⁵ Similar recommendations have also been made by the European Commission¹⁷⁶ and OSCE/ODIHR.

During the monitoring period, activities with electoral implications were observed on the part of at least 6 such subjects, as follows:

- *European Initiative [Inițiativa europeană]*

According to the official website,¹⁷⁷ it is a civic platform made up of people who want to contribute specifically to the process of Moldova’s integration into the EU, and the goal is “membership status by 2030,” similar to the term promoted by the current government.

Promo-LEX observers reported at least 3 activities of distribution of informative materials (newspapers with a circulation of at least 3,500 copies, and calendars with a cumulative circulation of 8,000 copies), as well as sponsored posts on social networks (MDL 24,399). These materials reflect information about the EU, as well as the need to vote for a pro-European Parliament on 28 September 2025.

- *Moldova Free State [Moldova Stat Liber]*

A page on social networks, declared to be run by a non-governmental organization, which promotes critical messages about the entities and forces that are not in government or that, for one reason or another, have left PAS. Through it, at least 12 sponsored posts (MDL 31,362) were posted only in the last 30 days. Currently, the page is no longer active (it has been deleted).

- *Stop the Theft and War Group [Opriți gruparea Hoție și Război]*

A page created in October 2022, during the period when PAS representatives used this slogan extensively. Although the “Stop the Theft and War Group” slogan has been extensively used by PAS representatives, it is not possible to link that page to the PAS party for lack of conclusive evidence. Through it, critical messages are disseminated about the Patriotic EB, Alternative EB, PN, and Ilan Șor / people affiliated to him. At least 27 sponsored posts (MDL 82,922) were posted in the last 30 days alone.

- *Jose Perry; Esther Bush*

Pages on social networks, seemingly fake, which promote critical messages about PAS, as well as about Vladimir Plahotniuc. On the first page, 16 sponsored posts (MDL 24,419) were published between 29 July and 3 August alone, and on the second page – 6 posts (MDL 12,111); however, they were soon blocked by META for failure to label them properly (political/electoral topics).

- *Moldova Moldovan Moldovan [Молдова Молдовенеск Молдовенеште]*

A page on social networks promoting critical messages about the Patriotic EB, Alternative EB, and PN. Through it, at least 15 sponsored posts (MDL 20,206) were posted in the last 30 days alone.

- *Website <https://moldovenii.md/md>*

¹⁷⁴ OSCE/ODIHR [Note](#) on third party regulations in the OSCE region.

¹⁷⁵ [Promo-LEX policy paper](#): Political and electoral financing by “third parties”

¹⁷⁶ [European Commission](#), Republic of Moldova 2023 Report. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2023 Communication on EU Enlargement policy, November 2023, p.4.

¹⁷⁷ [Inițiativa europeană](#).

This page purports to be a project aimed at “studying, understanding, and promoting the true history and values of the culture and civilization of Moldova.”¹⁷⁸ The authors of the website are allegedly a group of 50 people, experts in the field of history, religion, culture, political science, business, economics, and finance. The information they share is declared not to be carried out for the purpose of a political party. However, upon a more detailed analysis of the information disseminated on this website, we found that it resembles the information distributed in the territory by PAM – “The Creed of Moldovans”; “We, Moldovans”; “Development strategy”. The website also shares the events held by PAM.¹⁷⁹

In conclusion, we find that the phenomenon of “third parties” involvement is present, and the financial expenses incurred by them for promoting/denigrating certain parties/projects is significant, thus circumventing the legal framework on political and electoral financing.

¹⁷⁸ [About](https://moldovenii.md/md) the website <https://moldovenii.md/md>.

¹⁷⁹ See under the heading [News](#).

VII. ELECTION AND CAMPAIGN FINANCING

We reiterate that in the context of the parliamentary elections of 28 September 2025, 21 persons expressed their intention to register as an independent candidate for the position of MP. Of these, only 3 constituted IGs (Olesea Stamate, Andrei Năstase, and Oleg Bolotnicov), and the remaining 19 opted for collecting signatures by themselves.

The financial reporting process of IGs / independent candidates is reflected in Table 9.

Table 9. Financial reporting of IGs / independent candidates

No.	IG	Registration	Treasurer	Account opening	Term 28.07.25	Term 04.08.25	Term 11.08.25	Term 18.08.25	Final report
1	Olesea Stamate's IG*	22.07.25	-	information	28.07.25	04.08.25	11.08.25	-	12.08.25
2	Andrei Năstase's IG*	22.07.25	22.07.25	information	28.07.25	04.08.25	-	-	04.08.25
3	Eleonora Rusu****	independent		information	information	information	information	information	information
4	Sergiu Rența**	independent		information	information	information	information	information	information
5	Victoria Sanduța*	independent		information	information	information	information	information	information
6	Natalia Clevadi****	independent		information	information	information	information	information	information
7	Victor Grosu****	independent		information	28.07.25	04.08.25	11.08.25	18.08.25	20.08.25
8	Nicolae Urîtu**	independent		information	information	information	information	information	information
9	Marcel Darie**	independent		information	information	information	information	information	information
10	Dina Carpinschi***	independent		information	information	information	information	information	information
11	Stepan Savițchi****	independent		information	information	information	information	information	information
12	Alexandru Țventarnî**	independent		information	-	06.08.25	12.08.25	15.08.25	17.08.25
13	Valentin Vinnicenco**	independent		information	-	information	information	information	information
14	Oleg Bolotnicov's IG**	10.08.25	-	information	-	-	information	18.08.25	20.08.25
15	Uliana Bideac**	independent		information	-	-	information	information	information
16	Igor Ianac***	independent		information	-	-	12.08.25	18.08.25	20.08.25
17	Tatiana Crețu*	independent		information	-	-	11.08.25	18.08.25	20.08.25
18	Roman Oglindă**	independent		information	-	-	11.08.25	18.08.25	20.08.25
19	Sergiu Ungureanu**	independent		information	-	-	information	information	information
20	Roman Emilianov*****	independent		-	-	-	-	-	-
21	Victor Brăileanu**	independent		information	-	-	-	information	information

*	registered as independent candidates
**	returned signatures collecting lists without requesting registration
***	registration rejected
****	no data on the results of the signatures collection process
*****	did not pick up signatures collecting lists to collect signatures

One independent candidate, Roman Emilianov, did not pick up signatures collecting lists from the CEC to collect signatures, nor did he present any information relevant to the financing process.

Among the other 20 candidates, only Andrei Năstase nominated a treasurer to the CEC, but no contender for registration as an independent candidate opened a bank account "Intended for the initiative group." All candidates complied with the obligation to report weekly, as well as to present final information on the financing of the signatures collection activity.

The total income declared during the signatures collection period was MDL 214,501, reported by 7 candidates (see Table 10). Most were declared by Andrei Năstase's IG – 80% of the declared income, followed by Olesea Stamate's IG – 13% of the income.

Table 10. Income declared by IGs / independent candidates

Candidate	Material donations*	Volunteering	Total
Andrei Năstase's IG	57,141	115,000	172,141
Olesea Stamate's IG	3,248	25,668	28,916
Oleg Bolotnicov's IG	0	1,200	1,200
Victor Grosu	2,150		2,150
Alexandru Țventarnî	1,187		1,187
Roman Oglindă	3,553		3,553
Tatiana Crețu	5,354		5,354
TOTAL	72,633	141,868	214,501

* Material donations were from advertising on social networks – MDL 61,239, transport – MDL 8,981, and street advertising – MDL 2,414.

The ceiling of funds that can be transferred to the account “Intended for the initiative group” was established by the CEC in the amount of MDL 57,564¹⁸⁰, which was calculated according to the maximum number of 2,500 signatures needed to be collected. Therefore, we find that in the case of Andrei Năstase’s IG, the respective ceiling was exceeded by MDL 115,577.

7.1. Financial reporting by electoral competitors

The process of financial reporting of electoral competitors includes several stages, as follows:

- *Appointment and presentation for confirmation of the person in charge of finances (treasurer)*

According to art. 55 para. (1) of the Electoral Code, the electoral competitor shall appoint and present for confirmation to the CEC a person responsible for finances (treasurer). According to the official website of the CEC, out of the 21 electoral competitors registered, only 4 did not have a treasurer confirmed as of 27.08.2025 (see Table 11).

In the case of PL, the registration of the person appointed as treasurer was rejected because of failure to present the declaration that he does not hold elected offices.¹⁸¹ Therefore, PL is to appoint the treasurer repeatedly.

Table 11. Information on financial reporting to the CEC

No.	Competitor	Registration	Treasurer	Report at the start of campaign	Opening of Electoral Fund
1	PAS	27.07.25	27.07.25	31.07.25	04.08.25
2	PPDA	30.07.25	30.07.25		information
3	CUB	06.08.25	06.08.25		13.08.25
4	Andrei Năstase IC	06.08.25	06.08.25		09.08.25
5	ALDE	10.08.25	10.08.25		20.08.25
6	Olesea Stamate IC	13.08.25	13.08.25		22.08.25
7	PNM	15.08.25	15.08.25		19.08.25
8	PSDE	15.08.25	15.08.25	18.08.25	18.08.25
9	MRM	18.08.25	18.08.25	26.08.25	26.08.25
10	Patriotic EB	18.08.25	18.08.25	12.08.25	Information
11	Alternative EB	18.08.25	18.08.25	27.08.25	26.08.25
12	Together EB	19.08.25	23.08.25		Information
13	LOC	21.08.25	21.08.25		Information
14	AUR	21.08.25	21.08.25		Information
15	Victoria Sanduța IC	22.08.25			information
16	PAM	23.08.25	23.08.25		information
17	BUN EB	24.08.25			information
18	PL	24.08.25	rejected		information
19	UCSM	25.08.25	25.08.25		information
20	Tatiana Crețu IC	26.08.25			
21	PN	26.08.25	26.08.25		25.08.25

- *Opening of “Electoral Fund” account*

According to art. 56 para. (1) of the Electoral Code, within 3 days after registration, the electoral competitor shall open an “Electoral Fund” bank account. Subsequently, within 24 hours, information about the opened account is to be presented to the CEC. In case of non-opening of the mentioned bank account, the electoral competitor is to inform the CEC about this fact, with the conduct of electoral campaign activities that do not involve financial expenses.

According to the official website of the CEC, only ten electoral competitors confirmed to the CEC the opening of the “Electoral Fund” bank account by 27.08.2025. Ten other electoral competitors informed the CEC that they had not yet opened the respective bank account. Regarding the 21st electoral

¹⁸⁰ [CEC Decision](#) no. 3666 of 19 July 2025 on establishing the ceiling of funds that can be transferred to the account “Intended for the initiative group” to support the independent candidate for the position of Member in the Parliament of the Republic of Moldova in the parliamentary elections of 28 September 2025.

¹⁸¹ Article 55 para. (3) of the Electoral Code.

competitor (registered on 26.08.25, with a deadline to submit information by 29.08.25), information is missing (the CEC is to publish the information within 24 hours of receipt).

- *Submission of the financial report at the start of the electoral period by political parties that intend to transfer their own funds to the “Intended for the initiative group” / “Electoral fund” account.*

According to art. 57 para. (3) of the Electoral Code, political parties may transfer to the “Electoral fund” account their own funds, held on their accounts at the time of the start of the electoral period, under the condition of submitting a financial report to the CEC, indicating information about the income obtained and expenses incurred before the start of the electoral period.

According to the official website of the CEC, such reports were submitted by five political parties – PAS, PSDE, MRM, PCRM (member of the Patriotic EB), and MAN (member of the Alternative EB).

7.2. Management of the financial reporting process by the electoral authority

In the context of signatures collection by IGs / independent candidates in support of their running for the position of MP, the CEC adopted 4 decisions¹⁸² on the supervision and control of the financing of electoral competitors. Based on them, the following sanctions/corrective measures were applied:

- ✓ Warning of 3 electoral competitors for late presentation of information on the financing of signatures collection (Andrei Năstase’s IG, Olesea Stamate’s IG, and Alexandru Țventarnîi);
- ✓ Warning of 2 electoral competitors for violating the financing rules (Andrei Năstase’s IG – for exceeding the ceiling of funds for IG, and Alexandru Țventarnîi – for repeatedly late presentation of information on financing);
- ✓ Obliging Andrei Năstase IC to transfer to the state budget the amount that exceeded the legal ceiling established by the CEC for IGs – MDL 115,577 (the declared value of income in the form of material donations).

Regarding the obligation imposed on Andrei Năstase to transfer to the state budget the amount that exceeded the ceiling established by law, we find that a large part of the exceeded value is the assessed cost of the volunteering provided by IG members in the process of collecting signatures (22-31 July 2025). In this respect, we shall note that in the Register of persons performing volunteer activity (final), Andrei Năstase reported 58 members of the IG, for whom a reward of MDL 115,000 was estimated.

We shall remind that Andrei Năstase’s IG was registered on 22 July 2025, consisting of 55 members.¹⁸³ No other decision adopted by the CEC on the modification of the IG composition has been identified. However, the financial report included 3 more IG members¹⁸⁴ that allegedly collected signatures and, respectively, expenses for their work were estimated.

According to the law,¹⁸⁵ the collection of signatures in support of a candidate for an elective position by persons who are not registered according to the legislation in force is sanctioned with a fine of 60 to 90 conventional units applied to an individual and, respectively, with a fine of 90 to 180 conventional units applied to a person in a responsible position.

On the same topic, we find that currently, there is no regulatory act that details the way in which electoral competitors are to evaluate/estimate/report on volunteer activities. The Electoral Code establishes that the financing of IGs / electoral campaigns also includes volunteering and services provided to electoral competitors free of charge.

Respectively, the CEC Regulation on the financing of initiative groups and electoral campaigns¹⁸⁶ stipulates that competitors have the right to incur financial expenses for rewards to

¹⁸² CEC decisions no. [3733](#) of 3 August 2025, no. [3781](#) of 13 August 2025, no. [3801](#) of 15 August 2025, and no. [3844](#) of 22 August 2025 on the supervision of the activity of initiative groups established to collect signatures in support of independent candidates for the position of Member in the Parliament of the Republic of Moldova for the parliamentary elections of 28 September 2025, appointed by citizens’ assembly, and of the signatures collection activity carried out personally by the independent candidates who put themselves forward as candidates and did not constitute initiative groups.

¹⁸³ [CEC Decision](#) no. 3672 of 22 July 2025 on the application for registration of the initiative group to support the candidate for the position of Member of Parliament of the Republic of Moldova, Mr. Andrei Năstase.

¹⁸⁴ Grosu Sergiu, Zestrea Emilian, and Vartic Liudmila.

¹⁸⁵ Art. 51¹ of the [Contravention Code](#).

¹⁸⁶ [Regulation](#) on the financing of initiative groups and electoral campaigns, approved by CEC Decision no. 1185/2023, pt. 67-68¹.

volunteers/campaigners (transport, accommodation, food, optional medical insurance against the risks arising from the nature of the activity performed, per diems, etc.). They are to be included in the corresponding expenditure line of the report (Annex 6 to the Regulation, 3.1.3 Expenditure for rewards to volunteers/campaigners). Therefore, the financial expenses incurred directly from the “Intended for IG” / “Electoral fund” account can be attributed to this category.

At the same time, the Regulation stipulates that volunteer activity is considered free and voluntary provision by the citizens of Moldova of services, knowledge, and skills for the benefit of electoral competitors, or participation in the provision of activities organized and carried out by electoral competitors. Volunteers can be engaged only for the provision of unqualified services (informing about electoral competitors, raising funds for their financial support, organizing and participating in events, etc.).

The above-mentioned volunteer activities are to be evaluated by electoral competitors at the average market price and, respectively, are to be included in the *Register of persons carrying out volunteer activities* (part of the financial report, but not found as a component of its Compartments I-II – Generalizing table). Therefore, for the respective services, electoral competitors do not incur financial expenses from the “Intended for IG” / “Electoral fund” account.

However, at present, when downloading the *Register of persons who carry out volunteer activity* directly from the “Financial Control” ISS, column 7 of the table indicates information on the “Amount of reward paid (MDL) according to pt. 67 of the Regulation,” which implies that expenses were incurred for them from the “Intended for IG” / “Electoral fund” account. De facto, this section shall include the value estimated by electoral competitors for the volunteer activities they benefited from, for which no financial expenses were incurred directly from the bank account – as specified in Annexes no. 5 and 6, sheet 6 of the Excel document. In this aspect, we find that the CEC did not approve any changes to the content of the said annexes, in particular to the *Register of persons who carry out volunteer activity*.

In the case of Andrei Năstase IC, de facto, partially, he was obliged to transfer to the state budget funds that were estimated by the electoral competitor for volunteer services provided by initiative group members in the process of collecting signatures, i.e. services provided free of charge.

Comparatively, we shall mention that in the context of collecting signatures in the presidential elections of 2024, electoral competitors had different approaches to the evaluation and, respectively, reporting of volunteer services. Thus, for example, in the case of Maia Sandu’s IG (PAS), 100 signature collectors were reported, involved between 24 August and 12 September 2024 (20 days of collection), for whom a total amount of MDL 10,000 was estimated, i.e. MDL 100 per person. In another case – Tudor Ulianoschi’s IG (IC), with 66 registered IG members, for the period of 24 August to 20 September 2024, the involvement of only 8 members in the process of collecting signatures was reported, for the volunteer activity of whom MDL 0 (zero) were estimated. The CEC did not address these issues.

In the opinion of Promo-LEX, the evaluation of volunteer activities, given that they are a component part of the financing of IGs / electoral campaigns, is to be included as a component part of the total income and expenses reported by electoral competitors. For this reason, we consider that there should be a unique approach, in the form of a regulatory act developed and approved by the CEC, to the way in which these activities are to be evaluated and reported – a recommendation that was formulated also in the context of observing the presidential election of 2024.¹⁸⁷

Thus, we consider that the values estimated for volunteer activities can be included as a component part of the *income from donations from individuals in the form of property, goods, merchandise, objects, works, or services free of charge or on terms more advantageous than the commercial or market value, evaluated in MDL* (line 2.2 of the Generalizing table), in the form of a new subpoint – 2.2.6 *Volunteer activities evaluated*. Respectively, the same information is to be included in the *expenses from donations in the form of property, goods, merchandise, objects, works, or services free of charge or on terms more advantageous than the commercial or market value* (line 3.2 of the Generalizing table), in the form of a new subpoint – 3.2.6 *Volunteer activities evaluated*.

¹⁸⁷ [Report](#) no. 2 – Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024, pp. 46-47.

7.3. Approval of reports on the complex control of some political subjects

Between 25 October 2024 and 31 July 2025, the CEC carried out the mission of complex control of the financing of the Victory PB (through its constituents – PR, FASM, Chance Party, PPV), PPVM, and Victoria Furtună IC for the period of 1 July to 31 October 2024.¹⁸⁸ On 14 and 21 August 2025, the CEC approved reports on the complex control of financing of FASM, PPV, Chance Party, and PR¹⁸⁹ (constituents of the Victory PB), of PPVM,¹⁹⁰ and of Victoria Furtună (IC).¹⁹¹

As a result of complex controls, the CEC found illegal financing of political entities and the independent candidate, which violates the principles of equality in relation to other political actors and implicitly the rule of law as a fundamental element of democracy. In the CEC's view, the above-mentioned issues prejudice free, fair, and transparent political and electoral competition, with a detrimental impact on the legitimacy of the acquired power and a serious prejudice to political pluralism and fundamental democratic principles.

The complex control carried out by the CEC found the following issues:

- Victory PB and its constituents

The CEC concluded that the organization of electoral events without being registered as an electoral competitor, without concluding rental agreements with the owners of the premises where the events were organized and with transport service providers (organized transportation to events), directed organization of protests/flashmobs with financial expenses and destabilizing messages, production and distribution of informative materials without compliance with legislation on transparency are conclusive evidence of illegal financing of the constituent political parties of Victory PB.

The electoral authority found illegal financing of PR through donations from 6 individuals exceeding the ceiling established by law, in a total amount of MDL 79,129, PR being ordered to transfer this amount to the state budget. At the same time, as regards the donors, the CEC drew up 6 minutes on contravention, the fines being paid voluntarily by the offenders (total value of MDL 16,500).

For the organization and conduct of political and socio-cultural events by the Victory PB, the CEC found a minimum of MDL 2.9 million not reported according to legal provisions. Given that they exceeded the minimum ceiling of 20 average monthly salaries per economy for 2024 (MDL 274 thousand), the electoral authority notified the Anticorruption Prosecutor's Office in order to verify the activities that involved the expenses identified through the prism of the offense of illegal financing of political parties.¹⁹²

- PPVM

As regards this political party, the CEC also found organization of electoral events and use of services and materials that were not reported according to legal provisions (rental, transport services, equipment, etc.). In addition, it found illegal financing through donations from individuals exceeding the legal ceiling, amounting to a total of MDL 524,310, for which the CEC initiated and examines 49 contravention lawsuits, not yet having elucidated all circumstances.

At the same time, the electoral competitor allegedly accepted and used in the campaign, but did not evaluate and report properly, materials, goods, services, and works, which were not evaluated and declared according to the provisions of the law, their total value being MDL 239,843 – the amount that the PPVM was ordered to transfer to the state budget.

¹⁸⁸ Promo-LEX [Report](#) on the financing of political parties in Moldova. Retrospective for year 2024, p. 14.

¹⁸⁹ [CEC Decision](#) no. 3788 of 14 August 2025 approving the report on the complex control of the financing of the Alternative and Rescue Force of Moldova Party, the Victory Party, the Chance Party, and the Revival Party for the period of 1 July to 31 October 2024, carried out on the basis of the Central Electoral Commission Decision no. 3141/2024.

¹⁹⁰ [CEC Decision](#) no. 3833 of 21 August 2025 approving the report on the complex control of the financing of the Future of Moldova Party for the period of 1 July to 31 October 2024, carried out on the basis of the Central Electoral Commission Decision no. 3141/2024.

¹⁹¹ [CEC Decision](#) no. 3789 of 14 August 2025 approving the report on the complex control of the financing of the initiative group and the electoral campaign of the independent candidate for the position of President of the Republic of Moldova Mrs. Victoria Furtună, for the period of 1 July to 31 October 2024, carried out on the basis of the Central Electoral Commission Decision no. 3141/2024.

¹⁹² Art. 126 para. (1) and art. 181³ of the Criminal Code.

The complex control also reflected that PPVM, contrary to legal provisions, benefited and used property, goods, merchandise, objects, works, and services in any form, offered for consideration, without advance payment for them. For this reason, the CEC notified the State Tax Service to order physical tax posts at the offices of legal entities that provide printing services in order to exclude cases of issuing advertising materials without their full advance payment.

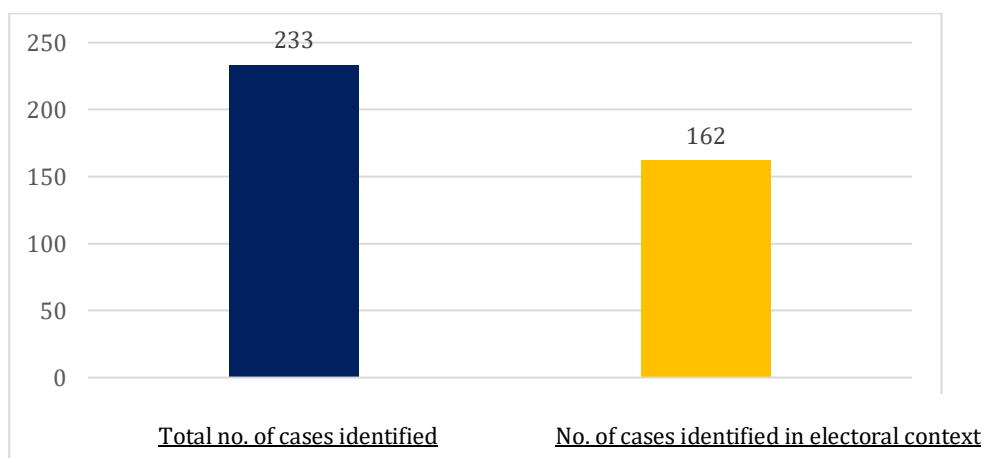
- Victoria Furtună (IC)

The CEC found the use by the candidate and in her interest of financial resources not declared in accordance with the provisions of the law (for the development of the website, production of video spots and their sponsored dissemination), in the estimated amount of at least MDL 229,636 – an amount that Victoria Furtună was ordered to transfer to the state budget.

VIII. HATE SPEECH AND INCITEMENT TO DISCRIMINATION

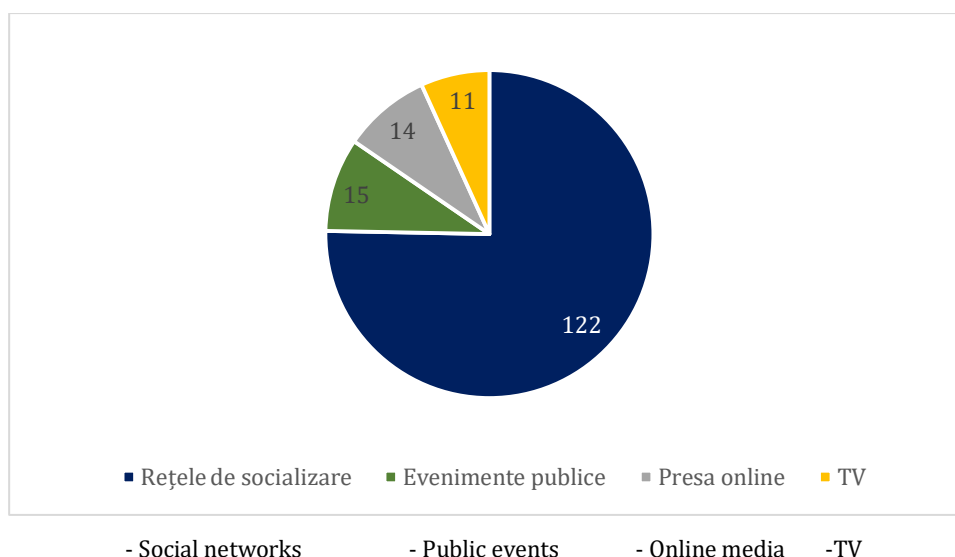
At least 233 cases of hate speech, incitement to discrimination, and other forms of intolerance were identified between 21 July and 19 August 2025. Of these, 162 cases took place during campaigning before the parliamentary elections of 28 September 2025, gathering more than 2,500,000 views (see Chart 3).

Chart 3. Cases identified during the monitoring period



The majority of cases (122 of 162, or 75% of the cases identified) were published in social media and mobile applications. In 15 cases, hate messages were transmitted during public events, protests or rallies, in 14 cases through online media and in 11 cases through TV channels (see Chart 4). Compared to the 2021 parliamentary elections, there is a negative trend in hate speech dissemination. Approximately 54% of the total number of cases identified between 11 May and 25 July 2021 were found in the period between 21 July and 19 August 2025 alone.¹⁹³ On the other hand, hate speech still tends to be generated, spread, or encouraged, especially through social networks, during this pre-electoral period compared to the 2021 parliamentary elections.

Chart 4. General categories of sources

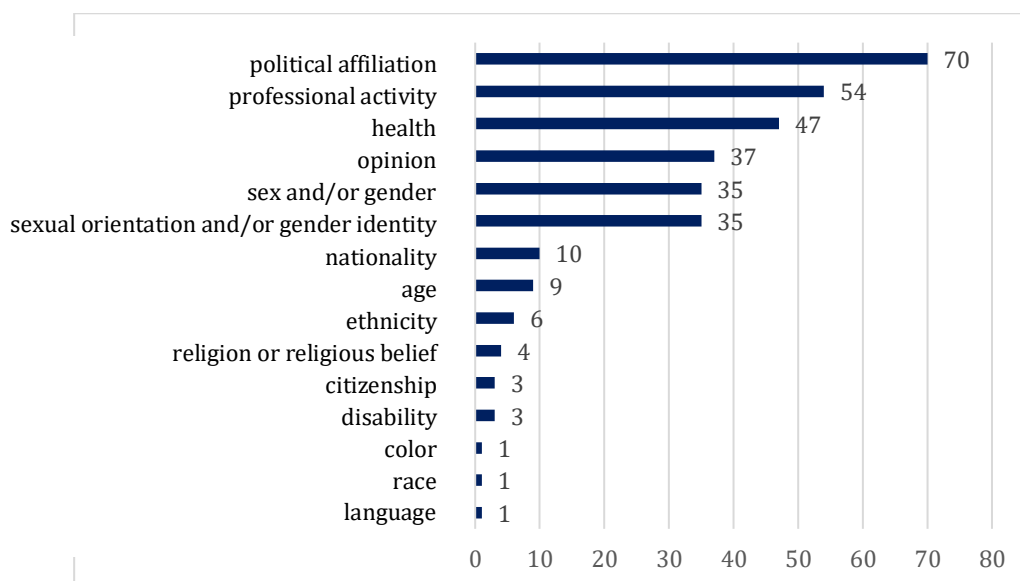


People between the ages of 35 and 50, male, generate, promote, and/or spread hate messages more often. The hate speech identified was based on different criteria, most often political affiliation (70 cases), professional activity (54 cases), health (47 cases), opinion (37 cases), sexual orientation and/or gender identity (35 cases), and sex and/or gender (35 cases). The messages were mainly directed against politicians, members/supporters of political parties, and politically appointed public officials (128 cases); women (38 cases); and LGBT people (33 cases); see Chart 5. Indirectly, hate speech based on

¹⁹³ P. 20, [Monitoring Report](#) "Hate speech and incitement to discrimination in the public space and in the media of Moldova during the electoral campaign for the early parliamentary elections of 11 July 2021", Promo-LEX, 2021, last accessed: 21 August 2025

stereotypes and prejudices most often targeted people suffering from mental health problems (20 cases). During the monitoring period, women were more often targeted by hate speech (44 cases) than men (41 cases). The age group of the people predominantly targeted by this type of speech was above 50 years old.

Chart 5. Criteria underlying hate speech identified in electoral context



7.1. Hate speech generated by politicians, members and supporters of political parties/electoral blocs

On 23 July 2025, during a protest organized by the Party of Socialists of the Republic of Moldova (PSRM), Igor Dodon, ex-President of Moldova (2016-2020), ex-MP (2016-2019, July – October 2021), and PSRM Chairperson, threatened to use physical force against his opponents from the Action and Solidarity Party (PAS), saying:

“Don’t worry, I renovated this building (note: President’s Office). Maia Sandu criticized me for doing it. I renovated it. I won’t let anyone destroy this or that building. But we’ll drag them out of there (note: President’s Office) and out of here (note: Parliament) by the neck and ears. As early as October.”¹⁹⁴

The protesters reacted with “Bravo!” (followed by applause).

The protest was recorded and broadcast live on Privesc.eu and on the Facebook accounts of Igor Dodon, PSRM, and some online media outlets, and it was viewed by over 12 thousand people. This message was published by one of PSRM supporters, a protester nicknamed Ion_superpower100, on TikTok, where it was viewed by over 106 thousand people and shared over 600 times.

Another threatening message addressed by Igor Dodon to his election opponents (PAS) was given during another protest held on 17 August 2025, organized by the Patriotic Electoral Bloc of Socialists, Communists, Heart and Future of Moldova. Igor Dodon said:

“Maia Sandu, Grosu, Recean and others who think that, after we form the parliamentary majority with this team of patriots, they can block the appointment of the Government and stop us from appointing our Prime Minister – hear this: we will smoke you out of both places and the Constitutional Court. Don’t mess with people’s will!”¹⁹⁵

¹⁹⁴ Igor Dodon, [protest](#) organized by the Party of Socialists of the Republic of Moldova in front of the Ministry of Agriculture and Food Industry building, 23.07.2025, time: 22:32, last accessed: 21 August 2025

¹⁹⁵ Igor Dodon, [protest](#) organized by the Electoral Bloc of Socialists, Communists, Heart and Future of Moldova against the Constitutional Court takeover by PAS, 17.08.2025, time: 01:08:40, last accessed: 21 August 2025

In the context of the pre-electoral period and in the current political and social context (such as the use of verbal and physical violence against representatives of media outlets^{196,197} during public demonstrations, intimidation of and threats against representatives of the judicial system,¹⁹⁸ etc.) such threatening messages based on “political opinion” or “political affiliation” support the idea that using violence, including in politics, is a way of winning electoral competitions or preventing failure in potential political negotiations. Consequently, threats of physical violence are normalized and increase the risk of them turning into acts of violence not only against the directly targeted persons, but also against those politically affiliated.

A hate speech was also detected during a protest organized by the Heart of Moldova Party on 6 August 2025. Sergiu Butuc, Chairperson of the territorial office of Heart of Moldova Party in Cantemir, district councilor in the Cantemir District Council from the Party of Moldova Development and Consolidation (PDCM)¹⁹⁹ and ex-local councilor in Ciobalaccia (2019-2023) from Our Party,²⁰⁰ said:

“And let’s not forget to wish Mr. Grosu what he needs, i.e. another nice thing that he’ll need: a pack of cigarettes. I have no idea what the deal is, but I’ve seen it in the movies that cigarettes are more precious than gold in that place. Mr. Grosu, with all due respect, maybe you’d poison yourself. Only not too hard, because smoking vine leaves is dangerous for health. It hits you a little and you start to bend people. Then they bend you. You might need it. A nicotine cigarette is better. I’d add something else, but there’s someone walking down the road and I don’t want to scare them.”²⁰¹

The protest was recorded and broadcast live on the YouTube channel of Irina Vlah, Chairperson of the Heart of Moldova Party, as well as on her Facebook account, and was viewed by over 9 thousand people.

During the TEMA show at Primul in Moldova on 4 August 2025, Victoria Furtună, Chairperson of the Greater Moldova Party, used a homophobic speech. In her message she appealed to fears (the disappearance of Moldova as a state and the destruction of the traditional family). Greater Moldova’s Chairperson also referred to the “sources” of fears – her opponents (PAS) as the source of fear of state disappearance, on the one hand, and PAS and LGBT people as the source of fear of the “destruction” of the traditional family, on the other hand.

“And if we pay attention to the rhetoric used by those in power, they don’t see us as a state, they don’t see us as a nation, but they actually see us as a component part of another state. So, therefore, I’m not the only one here to say it is time to become aware, and to stand up from our knees, and to proudly say we are Moldovans and we are capable and we have professional expertise and we should be at the negotiating table. We hear the same thing from parties and countries in the EU. So, while the LGBT movement is being promoted in our country more than the traditional family, we see members of the European Union, representatives of the governing party and people from the United States coming to us and telling us loud and clear: ‘People, if we want peace everywhere, for everyone, then we must put family at the forefront. If we want countries to develop independently, then we must put the nation at the forefront. And if we want to have democracy instead of censorship, then we need to hear each other and make decisions in favor of the countries we represent.’”²⁰²

The show host Victor Stepaniuc supported the message and did not intervene to stop the homophobic speech. The show was posted on Primul in Moldova’s YouTube channel and was viewed by 1,400 people.

¹⁹⁶ Independent Journalism Center, [Statement](#) on increased number of journalist bullying and intimidation cases, 03.07.2025, last accessed: 22 August 2025

¹⁹⁷ General Police Inspectorate, [Information message](#), 27.08.2025, last accessed: 28 August 2025

¹⁹⁸ Radio Europa Liberă Moldova, [News](#) “Judge Livia Mitrofan receives new death threats”, 12.08.2025, last accessed: 22 August 2025.

¹⁹⁹ Cantemir District Council, [Detailed list](#) of councilors of the Cantemir District Council as of 01.08.2025, last accessed: 21 August 2025

²⁰⁰ Ciobalaccia Mayor’s Office, Cantemir district, [Composition of Ciobalaccia Local Council](#) (2019-2023), last accessed: 21 August 2025

²⁰¹ Sergiu Butuc, [Protest](#) organized by the Heart of Moldova Party, 06.08.2025, time: 25:26, last accessed: 21 August 2025

²⁰² Victoria Furtună, [TEMA show](#), Primul in Moldova, time: 43:56, last accessed: 21 August 2025

Similar messages were identified in three other cases of homophobic speech that were made and posted on TikTok and associated with the Greater Moldova Party and Victoria Furtună.

Another case of homophobic speech came during the Mlive online show from guest Vasile Costiuc, Chairperson of the Democracy at Home Party. Vasile Costiuc's speech was a combination of manipulation and homophobia. In other words, Vasile Costiuc initially made reference to a model administration, but not of a locality, but of a monastery, so that each audience member in their imagination could make a connection with the religion they share and their own religious beliefs. Then, he mentioned LGBT people, not presenting them as a group of people with equal rights, but using the rainbow symbol as a reference and qualifying them as "nonsense" and "harmful propaganda" that should be combated. In the end, Vasile Costiuc enhanced the antagonizing nature of the message, describing those who support traditional values as "very many" and united by principles such as "family", "society" and "God" versus LGBT people who are a minority ("those with the rainbow are few"). Vasile Costiuc used the concept of "silent majority", which is allegedly targeted by "LGBT propaganda", and thus justified the need for a "brave voice" to proclaim traditional values and bring the society to "normality".

"I assure you that, if these three districts here left with three people had a fair and efficient management, they would look like the Martha and Mary Monastery. To those of you who don't know what the Martha and Mary Monastery looks like: go to Causeni and see a monastery of rare beauty with arranged alleys, roses, animals, milk and dairy products, and everything. Because there is an internal order, and Moldova may look like a monastery, neat with flowers and beautiful, yet there should be discipline, order and faith in God. But we've wandered far and we walk around with this rainbow flag, and my colleagues will come from... American senators are categorically against this nonsense, and they will say the same thing in Chisinau. You know what I liked from the discussions we had in Washington? One of the senators said: "This pro-LGBT propaganda is so fierce and harmful that at some point we were scared to speak publicly that we share other values, until Donald Trump came and made things clear. So, when we voted for these principles, we saw that we are very, very, very many. Not just many, but very many." It's the same in Chisinau, until someone's crazy enough to say out loud: these are the principles that unite us – family, society, God, the principles that you'll find here with us, and you'll see that there are so many of us, but those with the rainbow are few. And those with the rainbow, as we have already seen, are not even on the PAS voting lists anymore. I guess, they're not happy either."²⁰³

The show host Gheorghe Gonța supported the message of his guest. The online show was posted on the YouTube channel Morari.live and was viewed by more than 48 thousand people.

²⁰³ Vasile Costiuc, MLive [online broadcast](#). Costiuc: Support for AUR. Criminal cases. Further actions, 22.07.2025, min.: 52: 05, Last accessed: 21 August 2025.

7.2. Hate speech against politicians, members/supporters of political parties / electoral blocs or other social groups



On 7 August 2025, a message was found on the WTF Moldova?! Telegram channel, which incites physical elimination of people who have a different political view.²⁰⁴ Thus, initially, the author associated PAS members and supporters with an animal or vegetal organism that attacks plants, crops, or animals and causes damage, thus dehumanizing them. He later encouraged the audience to call disinsection services to eliminate them.

The written message is also accompanied by a video showing two people in yellow vests with the inscription “PAS” during an information activity. The person being informed is holding a backpack insecticide sprayer and using it against PAS representatives.

The WTF Moldova?! Telegram channel is followed by more than 12 thousand people. On the day of publication, the message in question was viewed by more than 7 thousand people.

On 3 August 2025, a rally was organized in the city of Comrat in support of governor Evghenia Guțul, with an attendance of at least 500 people. It was broadcast online by Gagauziya Radio Televizionu on its YouTube channel, where it had over 4 thousand views, and on its Facebook account, where it had 130 thousand views. The event was moderated by Ivan Stamov, known as an activist and cultural figure in the Gagauz region. Participants included representatives of the Victory Political Bloc and members of the People’s Assembly of Gagauzia. Ivan Stamov incited violence against the journalists present at the event, dehumanizing them by associating them with “cockroaches”, saying:

“I want to make it clear to everyone standing in this square and everyone who hears me: we see instigators walking among us, trying to provoke some illicit actions or statements. Don’t fall for it. They are paid-for agents, paid by illegal criminal organizations such as the USAID or the Soros Foundation – those who brought the PAS party to power four years ago. Now they’ve sent their cockroaches here to bite you. And what do we do to cockroaches? Basın korkmayın! Baaaasın!» (translation from Gagauz: “Step on them, don’t be afraid. Step on them!”)²⁰⁵

Audience reaction: “Basaaaain!” (“Step on them!”) followed by applause.

Another hate speech was generated by Alexandr Muravschi, ex-MP (March 1998 – March 1999), ex-Deputy Prime Minister and ex-Minister of Economy and Reform of the Republic of Moldova (March–November 1999). On 27 July 2025, Alexandr Muravschi posted a message on his Facebook account, which indirectly incites acts of discrimination such as sending people with different political views to a

²⁰⁴ WTF Moldova?!, Telegram, [message](#) of incitement to violent actions, 07.08.2025, Last accessed: 22 August 2025.

²⁰⁵ Ivan Stamov, [Rally](#), 03.08.2025, time: 45:09, Last accessed: 21 August 2025.

detention camp.²⁰⁶ Moreover, this message was posted at a time of several national events commemorating the victims of the communist regime (6-27 July 2025) and shortly after the day commemorating the victims of political repressions deported to the GULAG (6 July 2025).

“Politicians who have divided the country into two irreconcilable groups belong in a camp.”²⁰⁷

Another hate message that took the form of a threat based on political opinion was found on the Facebook page of Victor Shmidt, a content maker, followed by 5 thousand people. On 11 August 2025, he published a message commenting on a news story about the statements made by Maia Sandu, President of Moldova, about the meeting between Donald Trump, US President, and Vladimir Putin, Russian President, in Alaska. Victor Shmidt’s message targeted both Maia Sandu and PAS members:

“I’ll sooner see you, Maia Grigorievna, become some kind of ‘Risipeni Hundred’, like the Heavenly Hundred in Ukraine.”²⁰⁸

The Heavenly Hundred is a concept that emerged in Ukraine after the Dignity Revolution known as Euromaidan (2013-2014). It honors the over 100 protesters killed in Kiev in February 2014 by law enforcement or snipers, who have become a symbol of the struggle for freedom. This concept was used by Victor Shmidt to suggest that a person (Maia Sandu) or a group of people (PAS members/supporters) could have a similar fate to the Heavenly Hundred.

During the monitoring period there was also a case of threat based on opinion sent in private, but made public by Vasile Costiuc, Chairperson of the Democracy at Home Party, to whom the threat was addressed. The author of the message was Ion Ciubotaru, who threatened to use violence and resorted to prejudice and stereotypes towards people with disabilities.

“YOU’RE SUCH A PRO-RUSSIAN IDIOT! I’D FUCKING KILL YOU ON THE SPOT ALONG WITH DODON AND OTHER HANDICAPPED FOLKS! IF YOU WRITE NONSENSE AGAIN, YOU IDIOT, I’M BLOCKING YOU!”

The message was posted by Vasile Costiuc on 15 August 2025 on the party’s Facebook page in the form of a story that becomes unavailable after 24 hours. The Facebook page of the Democracy at Home Party is followed by 528 thousand people.

Sexist and ageist speeches continue to be used against women and men involved in political life in Moldova. For instance, on 12 August 2024, the Ungureanu 112 Telegram channel, followed by more than 42 thousand people, posted a sexist message. The message contained insults and slander against Fulga Grabovschi, lawyer, and Maria Vieru, journalist. The latter is a candidate for the position of MP on the list of the Alternative Political Bloc.

“There, even Ion Chicu confirms that Fadei Nagacevschi was not happy and chose another ‘Alternative’ because he wasn’t happy with the list, as my sources said a week ago. I don’t understand why Stoianoglo’s mistress and the murderer and smuggler Grabovschi’s schizophrenic wife with a cow’s name started kicking because I happened to be right! One more piece of information has been confirmed, just like everything else. It’s reliable information, not the product of sick and desperate minds. Come on, you morons, I’m not the one who made their list, I’m not the one who recruited Fadei, and I’m not the one who put his mistress Maria Vieru on top of the list just to bring her down to a party’s zipper level of place 18 after a scandal.”²⁰⁹

The author emphasized the named persons’ alleged extramarital relationships in order to downscale the importance of their activity, but also to negatively influence the public perception of their role and status, therefore of the way in which they should be seen and treated. In the case of Maria Vieru, the author

²⁰⁶The term “camp” in post-Soviet speech usually refers to forced labor camp/correctional labor colony, which is a type of prison.

²⁰⁷ Alexandr Muravschi, [Public message](#), Facebook, 27.07.2025, Last accessed: 22 August 2025.

²⁰⁸ Victor Shmidt, [Public message](#), Facebook, 11.08.2025, Last accessed: 22 August 2025.

²⁰⁹ Ungureanu 112, Telegram, [Public message](#), 12.08.2025, Last accessed: 22 August 2025.

supports the stereotype that women cannot become MPs without being someone's "mistresses". In other words, he reduces women to sexual objects and thus cancels their role in political and social life.

The "age" criterion was found at the base of several hate speeches identified during the monitoring period. An example of this was the speech of Dorin Chirtoacă, politician, ex-mayor of Chisinau (2007-2018). During the Puterea a Patra show on the Național 4 TV channel, Dorin Chirtoacă said:

Moderator: You've seen, we've all seen the images. What is your opinion? I see Igor Dodon is very optimistic, while Vladimir Voronin is more skeptical, at least that's how it seemed to me.

Dorin Chirtoacă: Okay, first of all, Vladimir Voronin has one foot in the grave. I don't understand what a guy his age could need. I had a father Vladimir Voronin's age and, unfortunately, I lost him last December, at 83-84 years old. A man should think about how to spend his old age, like everyone else, I think, beyond political opinions. I mean, it's somehow undignified to have a man at this age, who barely walks and talks, come out to the microphone and, I don't know, try and drag along those few percent that the Communist Party still has. What is this? Is this the Soviet Union? Are we going feet first like they did in Brezhnev's time, the way you want Putin to get out of the Kremlin?²¹⁰

With this message Dorin Chirtoacă supported the idea that an elderly person should not get involved in politics because he or she is incapable of political activity. The show host Olga Bejan did not intervene to stop the ageist speech. The show also appeared on Național 4's YouTube channel, where it was watched by over 1,700 people.

²¹⁰ Dorin Chirtoacă, Puterea a Patra [show](#), Național 4, 22.07.2025, time: 15:34, last accessed: 22 August 2025.

RECOMMENDATIONS

To the Parliament of Moldova:

- To regulate political and electoral financing by third parties.

To the Central Electoral Commission:

- To give up the amendments made to the Regulation on the status of observers and the procedure for their accreditation.
- To investigate cases of unauthorized conduct of opinion polls about the political/electoral preferences of voters, with the involvement of other competent institutions, if necessary.
- To prepare a guide/instruction on how to evaluate and report volunteer activities provided for the benefit of political entities / electoral competitors.
- To ensure compliance with the representativeness of each subject that has the right to appoint members to electoral bodies, in particular in the case of those from the Register of electoral officials, taking into account the experience of electoral officials and the history of appointments.
- To identify the measures that need to be implemented (including by amending the existing legal framework, if necessary) in order to ensure the transparency of the financing of the political parties participating in elections before the start of the electoral campaign.
- To ensure respect for observers' rights by granting access and providing election-related information in an optimal time.

To lower electoral bodies:

- To ensure compliance with the representativeness of each subject that has the right to appoint members to electoral bodies, in particular in the case of those from the Register of electoral officials, taking into account the experience of electoral officials and the history of appointments.
- To ensure free access (including physical access to the premises of electoral bodies) in the observation process.

To the Public Services Agency:

- To refrain from creating obstacles in the presentation of information of public interest and with electoral implications by means of requesting the payment of state fees by accredited observers.

To the Center for Continuous Electoral Training:

- To pay more attention to the certification of potential officials who will work in polling stations abroad.

To electoral competitors:

- To comply with the legal framework on administrative resources, ensuring clear delimitation between the state and political parties.

ABBREVIATIONS

para. – paragraph

ALDE – Alliance of Liberals and Democrats for Europe Political Party

ANRCETI – National Regulatory Agency for Electronic Communications and Information Technology

LPA – local public administration

art. – article

PSA – Public Services Agency

AUR – Alliance for the Union of Romanians Political Party

PEB – precinct electoral bureau

Patriotic EB – Patriotic Electoral Bloc of Socialists, Communists, Heart and Future of Moldova

BUN EB – The National Unity Electoral Bloc

BCS – Bloc of Communists and Socialists

PB – political bloc

SPPB – Special Purpose Police Brigade

BRP – Bureau for Reintegration Policies

EB – electoral bloc

AC – Audiovisual Council

CCA – Central Court of Appeal

CEC – Central Electoral Commission

DEC – second-level district electoral council

CCET – Center for Continuous Electoral Training

IC – independent candidate

SCJ – Supreme Court of Justice

ECtHR – European Court of Human Rights

CUB – Coalition for Unity and Welfare Political Party

FASM – Alternative and Rescue Force of Moldova Political Party

IG – initiative group

GPI – General Police Inspectorate

NII – National Integrity Inspectorate

lit. – letter

LGBT – lesbian, gay, bisexual, transgender

LOC – League of Cities and Communes Political Party

SCL – signatures collecting list

MFA – Ministry of Foreign Affairs

MAN – National Alternative Movement Political Party

OM – Observation Mission

MPSH – “Hope” Movement of Professionals

MRM – Respect Moldova Movement Political Party

mun. – municipality

NOI – New Historical Option Political Party

no. – number

OSCE – Organization for Security and Co-operation in Europe

TO – territorial organization
LTO – long-term observer
STO – short-term observer
PAM – Moldovans Alliance Party
PAS – Action and Solidarity Party
POCOCSC – Prosecutor's Office for Combating Organized Crime and Special Cases
PCRM – Party of Communists of the Republic of Moldova
PDMM – Modern Democratic Party of Moldova
PONA – “For People, Nature and Animals” Political Party
PNM – National Moldavian Party
PL – Liberal Party
PLDM – Liberal Democratic Party of Moldova
PN – Our Party
PPDA – Democracy at Home Political Party
PPN – Noi [We] Political Party
PPNM – National Moldavian Political Party
PPMM – Greater Moldova Political Party
PPV – Victory Political Party
PPVM – Future of Moldova Political Party
PR – Revival (Renaștere) Party
PRIM – Heart of Moldova Republican Party
PSDE – European Social Democratic Party
PSRM – Party of Socialists of the Republic of Moldova
pt. – point
d. – district
REO – Register of electoral officials
SRV – State Registry of Voters
v. – village
SAISE – State Automated Information System “Elections”
SIS – Security and Intelligence Service
subpt. – subpoint
PS – polling station
“Financial Control” ISS – “Financial Control” Information Subsystem
ESCL ISS – “Electronic Signatures Collecting List” Information Subsystem
ITCSS – Information Technology and Cyber Security Service
UCM – Centrist Union of Moldova Political Party
UCSM – Christian Social Union of Moldova Political Party
MSU – Moldova State University
ATUG – Autonomous Territorial Unit of Gagauzia
EU – European Union

ANNEXES

Annex no. 1. Cases that may qualify as conduct of unauthorized surveys

	Institution	Topic	Link	Identified expenses	Date of identification	Active / Inactive (26.08.2025)
1.	Not identified	Electoral options	Source		01.08.2025	Active
2.	Not identified	Electoral options	Source		24.07.2025	Inactive
3.	Not identified	Electoral options	Source		01.08.2025	Active
4.	AtlasIntel Survey	Electoral options	Source	Meta EUR 1-1,500	13.08.2025	Active
5.	Sondaje.md	Political options of inhabitants of the left bank of the Dniester	Source	Meta Under EUR 100	15.08.2025	Active
6.	Voxpublica.net	Electoral options	Source		15.08.2025	Active
7.	For Fair Elections [Pentru Alegeri Cinstite]	Electoral options	Source		08.08.2025	Active
8.	Not identified	Political/electoral options	Source		19.08.2025	Active
9.	RVM – Answers for the Ruture of Moldova. Anonymous polling platform	Political/electoral options	Source		20.08.2025	Active
10.	Not identified	Electoral options	Source		24.08.2025	Active

Annex no. 2. Applications for registration of electoral competitors

No.	Candidate	Documents submission date	Date of examination	Status	CEC Decision	No. of candidates on the list
1.	PAS	20.07.2025	27.07.2025	Registered	CEC Decision no. 3638/2025	104 ²¹¹ Women – 42 (40.4%) Men – 62 (59.6%)
2.	PPDA	20.07.2025	22.07.2025	Rejected	CEC Decision no. 3673/2025	
		23.07.2025	30.07.2025	Registered	CEC Decision no. 3682/2025	88 ²¹² Women – 40 (45.45%) Men – 48 (54.55%)
3.	CUB	30.07.2025	06.08.2025	Registered	CEC Decision no. 3744/2025	60 ²¹³ Women – 24 (40%) Men – 36 (60%)
4.	IC – Andrei Năstase	31.07.2025	06.08.2025	Registered	CEC Decision no. 3745/2025	
5.	ALDE	04.08.2025	10.08.2025	Registered	CEC Decision no. 3774/2025	54 Women – 28 (51.9%) Men – 26 (48.1%)
6.	IC – Olesia Stamate	06.08.2025	13.08.2025	Registered	CEC Decision no. 3779/2025	

²¹¹ List of candidates modified by [CEC Decision no. 3809](#) of 18.08.2025.

²¹² List of candidates modified by [CEC Decision no. 3778](#) of 13.08.2025, [CEC Decision no. 3827](#) of 20.08.2025, and [CEC Decision no. 3837](#) of 22.08.2025.

²¹³List of candidates modified by [CEC Decision no. 3857](#) of 24.08.2025

7.	PPNM	08.08.2025	15.08.2025	Registered	CEC Decision no. 2799/2025	55
						Women – 25 (45.45%)
						Men – 30 (54.55%)
8.	PSDE	08.08.2025	15.08.2025	Registered	CEC Decision no. 3800/2025	64
						Women – 29 (45.3%)
						Men – 35 (54.7%)
9.	PR	08.08.2025	15.08.2025	The CEC Decision did not meet the required number of votes.		
			21.08.2025	Rejected	CEC Decision no. 3835/2025	
10.	PPN	11.08.2025	Application withdrawn on 11.08.2025			
		16.08.2025	18.08.2025	Rejected	CEC Decision no. 3817/2025	
11.	MRM	11.08.2025	18.08.2025	Registered	CEC Decision no. 3818/2025	101
						Women – 43 (42.6%)
						Men – 58 (57.4%)
12.	Patriotic EB	11.08.2025	18.08.2025	Registered	CEC Decision no. 3819/2025	110 ²¹⁴
						Women – 46 (41.8%)
						Men – 64 (58.2%)
13.	Alternative EB	11.08.2025	18.08.2025	Registered	CEC Decision no. 3820/2025	103
						Women – 49 (47.6%)
						Men – 54 (52.4%)
14.	Together EB	12.08.2025	19.08.2025	Registered	CEC Decision no. 3823/2025	60 ²¹⁵
						Women – 27 (45%)
						Men – 33 (55%)
15.	UCM	13.08.2025	20.08.2025	Rejected	CEC Decision no. 3826/2025	
16.	LOC	14.08.2025	21.08.2025	Registered	CEC Decision no. 3828/2025	52
						Women – 28 (53.8%)
						Men – 24 (46.2%)
17.	AUR	14.08.2025	21.08.2025	Registered	CEC Decision no. 3829/2025	58
						Women – 25 (43.1%)
						Men – 33 (56.9%)
18.	IC – Victoria Sanduța	15.08.2025	22.08.2025	Registered	CEC Decision no. 3836/2025	
19.	PAM	16.08.2025	23.08.2025	Registered	CEC Decision no. 3847/2025	57
						Women – 23 (40.4%)
						Men – 34 (59.6%)
20.	PPMM	16.08.2025	23.08.2025	Rejected	CEC Decision no. 3846/2025	
21.	PONA	08.08.2025	Application withdrawn on 08.08.2025			
		16.08.2025	23.08.2025	Rejected	CEC Decision no. 3845/2025	
22.	BUN EB	17.08.2025	24.08.2025	Registered	CEC Decision no. 3854/2025	66
						Women – 28 (42.4%)
						Men – 38 (57.6%)
23.	NOI	17.08.2025	24.08.2025	Rejected	CEC Decision no. 3853/2025	
24.	PL	17.08.2025	24.08.2025	Registered	CEC Decision no. 3850/2025	56
						Women – 26 (46.4%)
						Men – 30 (53.6%)
25.	PDMM	18.08.2025	25.08.2025	The CEC Decision did not meet the required number of votes.		
			The application for registration was assigned for examination to another reception group.			
26.	UCSM	18.08.2025	25.08.2025	Registered	53	

²¹⁴ List of candidates modified by [CEC Decision no. 3856](#) of 24.08.2025

²¹⁵ List of candidates modified by [CEC Decision no. 3866](#) of 26.08.2025

					CEC Decision no. 3861/2025	Women – 23 (43.4%) Men – 30 (56.6%)
27.	IC – Dina Carpinschi	18.08.2025	25.08.2025	Rejected	CEC Decision no. 3860/2025	
28.	PN	19.08.2025	26.08.2025	Registered	CEC Decision no. 3873/2025	103 Women – 47 (45.63%) Men – 56 (54.37%)
29.	IC – Natalia Clevadî	19.08.2025	26.08.2025	Rejected	CEC Decision no. 3863/2025	
30.	IC – Igor Ianac	19.08.2025	26.08.2025	Rejected	CEC Decision no. 3864/2025	
31.	IC – Tatiana Crețu	19.08.2025	26.08.2025	Registered	CEC Decision no. 3865/2025	
32.	MPSH	19.08.2025	24.08.2025	Rejected	CEC Decision no. 3855/2025	

Annex no. 3 Cases qualified as misuse of administrative resources for purposes of promotion with electoral implications

Competitor	No.	Date	Event details
Patriotic EB	1	28.07.2025	On 28 July 2025, the PSRM Republican Council meeting organized in Chisinau was attended by the mayor of Anenii Noi, Alexandru Mațarin, during working hours.
	2	30.07.2025	On 30 July 2025, the mayor of Anenii Noi, concurrently the chairman of PSRM's TO in Anenii Noi, Alexandru Mațarin, attended a PSRM working meeting in Chisinau during working hours.
	3	07.08.2025	On 7 August 2025, a meeting of party members took place in Soroca. PSRM secretary and Alla Bordian, deputy president of the district – both employed in state institutions – were present during working hours.
	4	11.08.2025	On 11 August 2025, Alexandru Mațarin, mayor of Anenii Noi, participated in submitting documents to the CEC for registration as a candidate on the lists of the Patriotic EB, during working hours.
LOC	5	14.08.2025	On 14 August 2025, during working hours, Vladislav Cociu, mayor of Stefan Voda, went to Chisinau to submit documents to the CEC in order to register as a candidate on the lists of LOC.
	6	14.08.2025	On 14 August 2025, Constatin Cojocar, mayor of Edinet, was present at the submission of documents to the CEC for registration as a candidate on the lists of LOC, during working hours.
MRM	7	11.08.2025	On 11 August 2025, Natalia Ciobanu, mayor of Petruseni v., Riscani d., candidate on the list of MRM, went to Chisinau to submit documents to the CEC for registration during working hours.
PAS	8	22.07.2025	On 22 July 2025, during a meeting with citizens in Bratuleni v., Nisporeni d., Dorin Recean, prime minister and candidate designated on the PAS list, asked the participants to mobilize in the context of the autumn parliamentary elections in order to preserve the European course.
	9	23.07.2025	On 23 July 2025, Igor Grosu, Speaker of the Parliament, had a working visit to Telenesti, where he had a meeting with mayors and school directors from the district. He emphasized the achievements of the last 4 years, which allegedly show that the direction is correct, and pointed to the need to continue this development, while preserving the European course of the country. The event was attended by mayors and school directors, president and vice-presidents of the District Council, secretary of the State Chancellery (during working hours).
	10	25.07.2025	On 25 July 2025, a meeting was organized of PAS MPs – Leahu Mihail and Igor Chiriac (candidate registered on the PAS list) – with the employees of Frasin town hall, Donduseni d., during working hours.
	11	29.07.2025	On 29 July 2025, Vladimir Bolea, Minister of infrastructure and regional development, accompanied by Mr. Pavel Culicovschi, president of Cantemir district, had a working visit to Gotesti v., Cantemir d., where they met with citizens. At the meeting, PAS newspapers were distributed.
	12	29.07.2025	On 29 July 2025, Dorin Recean, Prime Minister, candidate registered on the PAS list, had a meeting with citizens in Sofia v., Drochia d., where he discussed the direction to be chosen for Moldova, how important the accession to the EU is.
	13	30.07.2025	On 30 July 2025, Igor Grosu, Speaker of Parliament, candidate registered on the PAS list, had a meeting with voters at the Embassy of Moldova in Switzerland. There, he assumed the merits of PAS for the infrastructure projects carried out in the localities of the country, and pointed out that if they do not get a good result in the parliamentary elections, then no more funds will be provided for the implementation of projects. He also communicated about the relationship of the ruling party with local elected officials who are not from PAS, stressing that there are no more apolitical officials, all apolitical being at the Doina cemetery.
	14	30.07.2025	On 30 July 2025, at the meeting with voters from Taul v., Donduseni d., PAS MPs Mihail Leahu, Igor Chiriac, as well as Alexandru Bordeinî, candidate registered on the PAS list (deputy head of the Edinet Territorial Office of the State Chancellery), attributed the merits for the construction of the water main in the village to PAS. To travel to the meeting, where PAS newspapers were distributed, they used the car of the State Chancellery no. C SI 076 Dacia Duster, GSG 492, and the car of the territorial social assistance agency.
	15	31.07.2025	On 31 July 2025, PAS MP Marina Morozova, candidate registered on the PAS list, had a meeting with social workers from Drochia district during working hours, where they discussed the country's European course, government achievements, and future development prospects, as well as topics related to strengthening the social system and the importance of European integration for citizens' well-being.
	16	01.08.2025	On 1 August 2025, on social networks and in particular on the PAS Truseni page, a post was made informing local residents about the opening of a new nursery group for children aged 1 to 2 years. The merits for this were assumed by the party, and Viorica Beregoi, mayor of the locality (PAS), is indicated as a signatory of the posted message.

17	05.08.2025	On 5 August 2025, Botnaru Oleg (PAS MP), Veaceslav Boldu (deputy head of the State Chancellery, Northern Territorial Office), Sergiu Ghiletschi (head of the National Office of Social Insurance, Glodeni branch), Ion Crudu (head of the Glodeni Territorial Structure of Social Assistance), had a meeting with citizens in Cajba village, during which newspapers and flyers promoting PAS were distributed, during working hours.
18	06.08.2025	On 6 August 2025, the mayors of Chetrosu v., Leonid Zalevschi, and of Tintareni v., Vadim Bulgaru, participated in the activities of promoting PAS by distributing newspapers in localities, during their working hours.
19	11.08.2025	On 11 August 2025, the PAS candidate for MP, Ludmila Adamciuc, had a meeting with the residents of Corpaci v., Edinet d. It was attended, during working hours, by the mayor of the village, Veaceslav Uji (PAS), and by Otilia Dulap, head of the Edinet Territorial Organization of Social Assistance. In her post on social networks, the candidate marked #UE2028 and # PAS, used by PAS in parliamentary elections.
20	12.08.2025	On 12 August 2025, Sergiu Lazarencu, minister of environment, accompanied by Larisa Novac, PAS MP, both candidates registered on the PAS list, had a meeting with voters in Varvareuca v., Floresti d., attended by public sector employees during working hours. They discussed achievements and future plans.
21	12.08.2025	On 12 August 2025, Sergiu Lazarencu, minister of environment, had a working visit to Floresti district, where he also had a meeting with citizens, including LPA employees, during their working hours, discussing investments in environmental projects. Mr. Lazarencu was accompanied by Larisa Novac, PAS MP, member of the Parliamentary committee on culture, education, research, youth, sports and the media, candidate registered on the PAS list. She spoke at the meeting held on the occasion of the visit of the minister of the environment.
22	13.08.2025	On 13 August 2025, Vladimir Bolea, minister of infrastructure and regional development, candidate registered on the PAS list, visited Nisporeni district, where he had a meeting with citizens. During this meeting, he spoke to the participants about the government's achievements in recent years, including with European funding, but also about the importance of the parliamentary elections, the outcome of which, including the continuation of the initiated processes, depends on each citizen and their conscience. The meeting was also attended by Vasile Portevschi, candidate registered on the PAS list; Dan Negel, mayor of Nisporeni; Ion Diavor, district president; Nicolai Drumea, deputy head of the Ungheni Territorial Office of the State Chancellery.
23	14.08.2025	On 14 August 2025, Ludmila Adamciuc, candidate registered on the PAS list, visited the Placement Center in Brinzeni, being accompanied by social workers and by the head of the Edinet Territorial Organization of Social Assistance, Otilia Dulap, during working hours. The post on social networks is accompanied by the PAS tags - #PAS, #UE2028.
24	14.08.2025	On 15 August 2025, in Carbutaru v., Ialoveni d., a meeting with voters was held, where the mayor's activity report regarding the projects implemented with the support of the PAS government was presented. The event was attended by Petru Frunze, PAS MP, and Ilie Ionaș, mayor of Costesti v., candidate registered on the PAS list, the latter assuring the people that their locality will be further supported.
25	17.08.2025	On 17 August 2025, the residents' meeting was held, organized by the town hall in order to report the achievements. Doina Gherman and Gheorghe Ichim, PAS MPs and candidates registered on the PAS list, participated as guests. The latter mentioned on social networks: Balasesti is the most pro-European village in Singerei district. When I get here, I don't need to convince people to keep our course. They know it is the right one. I usually come here to celebrate new projects. Projects are possible due to the openness of the PAS government, the Action and Solidarity Party. Thanks to Vice President Doina Gherman, who fights for Sangerei, because she cares a lot about our district. And of course thanks to the EU partners, who are waiting for us in their family, under the umbrella of peace.
26	17.08.2025	On 17 August 2025, the general meeting of residents took place, where the mayor of Sipoteni v., Calarasi d., Vasile Rață, presented the achievements of the last four years and the development plans for the next period. The event was attended by Mihai Popșoi, minister of foreign affairs, candidate registered on the PAS list.
27	18.08.2025	On 18.08.2025, Alexei Buzu, minister of labor and social protection, accompanied by Ersilia Qatrawi, candidate registered on the PAS list, had a meeting with social workers from Stefan Voda district, where they discussed the problems they have in the territory and how to bring support to people in difficulty. Messages were also delivered regarding the need to continue the course towards European integration, stressing the need to stay together in order to achieve the objective of integration.
28	19.08.2025	On 19 August 2025, Vladimir Bolea, minister of infrastructure and regional development, during a declared working visit, had a meeting with the mayors of the villages of Telenesti district, employees of the Education Directorate, the head of the Social Assistance Directorate, employees of the District Council, a representative of the territorial organization of the State Chancellery, etc., where they discussed the achievements of Moldova in 4 years of PAS government, the elections, and the importance of continuing the European path, the importance of 28 September in order to continue development projects.
29	19.08.2025	On 19 August 2025, Vladimir Bolea, minister of infrastructure and regional development, had a trip to Telenesti district, where he had several meetings with voters. In Mindresti v., the meeting was also attended by Iurie Tulgara, the district president, and Oxana Guzun, the mayor of the village, during working hours. At this meeting, the local elected officials spoke about the local achievements of the government, as well as about the autumn elections, urging attendees to choose the European course and people like Vladimir Bolea.
30	19.08.2025	On 19 August 2025, Vladimir Bolea, minister of infrastructure and regional development, allegedly had a working trip to the territory. During it, he had a meeting with voters in Negureni v., where it was communicated about the government's achievements, future plans, but also the need to maintain the European course. The meeting was attended by Ion Popa, mayor of the village, during working hours. Up to this point, the mayor was also involved in organizing the meeting (on his page on social networks, he announced it and urged people to participate in the event).
31	20.08.2025	On 20 August 2025, in Tareuca v., Rezina d., the mayor of the village organized a meeting with the residents in order to present achievements and future plans. The event was attended by PAS MP Vitalie Jacot, candidate registered on the PAS list. The post on social networks ends with the slogans declared to be used by the party in the elections - #PAS, #EU2028, #MoldovaEuropeana.
32	22.08.2025	On 22 August 2025, Victor Matragună, head of the Orhei territorial office of the State Chancellery, candidate registered on the PAS list, had a meeting with the employees of the Territorial Subdivision for Food Safety and the Orhei Territorial Office of Social Insurance, during working hours. They discussed the achievements of PAS government in Orhei district and the continuation of the European course. On one of the tables where one of the meetings took place, PAS information materials (calendars) were observed.

	33	23.08.2025	On 23 August 2025, the mayor of Boghenii Noi v., Ungheni d., invited the local residents to a meeting where the achievements of the last year and plans for 2026 were presented. The completed and ongoing projects were discussed. The meeting was also attended by Andrian Cheptonar, candidate registered on the PAS list, as well as Lucian Manole, deputy head of the Ungheni territorial office of the State Chancellery.
	34	23.08.2025	On 23 August 2025, the mayor of Raciula v., Calarasi d., organized the general meeting of the village to present the achievements of his activity in public office, together with the PAS government. The event was attended by Tatiana Rotari, head of the Ungheni territorial office of the State Chancellery, candidate registered on the PAS list.
	35	24.08.2025	On 24 August 2025, the general meeting of Horodiste v., Calarasi d., was held, announced and organized by the town hall, during which the mayor presented a report on the achievements made together with the PAS government. The event was attended by Doina Gheman, PAS MP; Vladimir Bolea, minister of infrastructure and regional development; Tatiana Rotari, head of the Ungheni territorial office of the State Chancellery; Nicolae Draganel, president of Calarasi district – all candidates registered on the PAS list. At the event, they discussed the achievements of PAS in 4 years of government, as well as urges to continue the European course.
	36	24.08.2025	On 24 August 2025, the general meeting of residents of Dragusenii Noi v. and Horodca v., Hincesti d, organized by the mayor and announced on the official pages of the LPA, took place. The agenda was the mayor's activity report for the period 2024-2025., as well as the speeches of the expected guests. The event was attended by Iurie Levinschi, president of Hincesti d, candidate registered on the PAS list; Ion Bunduchi, head of the Hincesti territorial office of the State Chancellery; Dumitru Vartic, vice-president of the district; Vasile Moraru, head of the Hincesti Environmental Protection Inspection.
	37	24.08.2025	On 24 August 2025, the general meeting of residents took place, where Petru Sorici, the mayor of Niscani v., Calarasi d., presented the activity report of the town hall for 2025. The event was attended by Tatiana Rotari, head of the Ungheni territorial office of the State Chancellery, and Nicolae Draganel, president of Calarasi district – both registered on the PAS list. At the event they discussed the achievements of the reporting period and the projects implemented with the support of the government.
PPDA	38	23.07.2025	On 23 July 2025, the mayor of Rusestii Noi v., Ialoveni d., Valentina Meșină, went to Chisinau to submit the application for registration as a candidate on the PPDA list, during working hours.
PSDE	39	01.08.2025	On 1 August 2025, the employees of Cimiseni town hall, Criuleni d., attended a meeting with PSDE representative Mihail Stratulat, in the so-called campaign of the party "Talking to the doctor". Mihail Stratulat is a candidate registered on the PSDE list.
	40	08.08.2025	On 8 August 2025, Valentina Grosu, mayor of Manoilesti v., and Corina Slupețcaia, vice-president of Ungheni d., went to Chisinau to submit documents for registration as candidates on the PSDE list, during working hours.

Annex no. 4. Content of the Communication Guide developed by PAS – “Together we take care of Moldova’s future”

Cuprins	
Mesaj general	3
Top 3 realizări	5
Ce vom face în următorii 4 ani	6
Ce putem pierde	
10 fraze descriptive	7
Mesaje pe domenii - top	8
Domenii - Realizări mai detaliate	10

Contents	
General message	3
Top 3 achievements	5
What we will do in the next 4 years	6
What we can lose	
10 descriptive phrases	7
Messages per areas – top	8
Areas – more detailed achievements	10

**Erratum: Due to an admitted error, in Report No. 2 of the Election Observation Mission for the 28 September parliamentary elections, on page 40, item 6.4, the following text was included: "On 4 August 2025, a promotional video was posted on the Facebook page of the Democracy at Home Party, featuring candidates registered on the PPDA list, Dinu Tudos and Ion Pralea, who speak about the campaign of the Association Forța Fermierilor (Farmers' Force). Through this solidarity campaign among farmers, those from Cahul district would support their colleagues from Căușeni district with grain (for autumn sowing)."*