

REPORT NO. 4

OBSERVATION MISSION FOR THE PARLIAMENTARY ELECTIONS OF 28 SEPTEMBER 2025

OBSERVATION PERIOD: 11 SEPTEMBER - 24 SEPTEMBER, 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

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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.

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EXECUTIVE SUMMARY

Legal framework. On 25 September, the Central Court of Appeal ordered the restriction of the activity of the PRIM party, as a security measure, at the request of the Ministry of Justice. This decision came after the CEC raised suspicions about the party's illegal financing. Limiting PRIM's activity has direct consequences for the Patriotic EB, of which it is a part, including the risk of violating the gender quota rule of the Electoral Code if the list of candidates were changed. Since the legislation allows adjustments to the lists only at least 10 days before the elections, the bloc no longer has the legal possibility to correct any defects.

The Promo-LEX OM points out that the unlawful actions of a constituent party should not automatically lead to the cancellation of registration of the entire electoral bloc and recommends applying equal treatment, similar to the one the CEC applied to PPDA, when the electoral authority obliged the electoral competitor to repair, within 24 hours, the non-conformities related to the mandatory criteria of meeting the gender quota, reserving the right to cancel its registration otherwise. At the same time, Promo-LEX recommends that the future Parliament amend the legislation so that the lists of candidates can be adjusted even closer to voting day, in justified situations.

Electoral bodies. During the observation period, the CEC held ten meetings and adopted 126 decisions. We found that during this period the number of accredited international observers increased significantly. Thus, upon request, the CEC accredited an additional 397 international observers and experts and 456 national observers. During the observed period, the CEC confirmed another 66 journalists in order to cover and monitor the elections.

By a decision of 25.09.2025, the CEC decided to relocate five polling stations for voters from the left bank of the Dniester, raising concerns about the limitation of access to voting. Although the CEC invoked the security risks reported by the General Police Inspectorate, the Security and Intelligence Service, and the Bureau for Reintegration Policies, the Promo-LEX OM found this decision extraordinary, having an impact on the exercise of constitutional rights. Reserve locations were preliminarily established for six other polling stations.

Out of the total 1,418 PEBs visited by Promo-LEX observers, 96% complied with the working hours. At the same time, only 68% of (visited) PEBs made public their composition, and 90% – the working hours, thus not fully ensuring compliance with the legal obligation to inform the public about the work of the bureaus. Managerial positions in the bureaus are held mostly by women (89% of the 1,668 visited), the gender balance in the management of the electoral body being found only in 174 electoral bureaus (12%).

The difficulties reported in the work of the bureaus include the incomplete composition of the electoral body, with a deficit of 40% of members in 17 PEBs in DEC no. 36 ATUG and DEC no. 1 Chisinau. According to Promo-LEX observers, on 25 September 2025, just three days before the parliamentary elections, the situation with filling the vacant positions in precinct electoral bureaus was not yet fully resolved.

Regarding the accessibility of PEBs, Promo-LEX found that only 35% are accessible to vulnerable groups, 18% are partially accessible, and 47% are inaccessible.

According to Promo-LEX observers, at least 4,452 representatives of four electoral competitors were confirmed at the PEB level: Alternative EB – 1,306 persons; PN – 1,129 persons; Patriotic EB – 1,912 persons; and PAS – 105 persons.

Electoral complaints and disputes. During the observation period, 5 notifications and 41 complaints were filed regarding electoral advertising, misuse of administrative resources, prohibited electoral activism, creation of a camouflaged electoral bloc. The Promo-LEX OM notes that many complaints about the misuse of administrative resources submitted to the CEC are subsequently sent to the GPI according to its competence, and it is not clear what criteria the CEC uses to decide whether a complaint should be examined by the electoral authority or sent to the GPI.

The courts examined seven electoral disputes, which referred to prohibited electoral activism (two disputes), use of administrative resources (three disputes), suspension from office (one dispute), creation

of a camouflaged electoral bloc (one dispute). They were examined by the courts within a period ranging from 2 to 5 days.

Activity of electoral competitors. In the last weeks of the campaign, Promo-LEX observers reported at least 1,984 electoral activities. Most of the activities found were carried out by PAS – 26%, and the Patriotic EB – 26%. Electoral advertising was used in at least 1,754 cases, the most active being three competitors: PAS – 27%, followed by the Patriotic EB – 24%, and PN – 23%.

Promo-LEX also observed non-compliant use of electoral advertising during the monitored period. Thus, the placement of electoral advertising in prohibited places was observed in 37 cases – by PAS (19 cases), PN (10 cases), Alternative EB (2 cases), PPDA and PSDE (1 case each); lack of full printing data – in the case of PNM, AUR, BUN; and the use of political advertising materials as electoral campaign materials – PSDE and PN (3 cases each), PAS (2 cases), IC Andrei Năstase (1 case).

Use of administrative resources, involvement of religious faiths in the campaign, and acts of intimidation and black PR. Promo-LEX observers reported at least 84 cases of misuse of administrative resources, of which 66 cases by PAS, 8 cases by the Patriotic EB, 5 cases by the Alternative EB, 3 cases by CUB, and 1 case each by LOC and PNM.

During the monitored period, at least six cases of active involvement of religious faiths in the electoral campaign were identified, despite the legal provisions prohibiting such actions.

There were also recorded at least six situations that can be classified as acts of intimidation and negative PR practices, especially targeting the Action and Solidarity Party (PAS), the Patriotic Electoral Bloc, as well as a public association.

Involvement of third parties in the electoral process. During the monitoring period, we observed activities with electoral impact carried out by at least 15 subjects that can be qualified as third parties: “Army of fake online accounts”, coordinated by the Russian Federation for the promotion of Victoria Furtună and PPMM; the Project for Fair Elections; pages on social networks: Mișcarea civică Inițiativa Europeană [Civic Movement European Initiative] – MDL 9,390; Moldova: AICI ȘI ACUM [Moldova: HERE AND NOW]; Alarmativa (MDL 50,390); Opriți gruparea Hoție și Război [Stop the Theft and War Group] (MDL 94,890); De pe internet [From the internet] (MDL 24,910); Inter Moldova (MDL 17,319); Молдова Молдовенеск Молдовенеште [Moldova Moldovan Moldovan] (MDL 16,731); Valorile Familiei Moldovenești [Moldovan family values] (MDL 6,650); Vocea Moldovenilor [Voice of Moldovans] (MDL 36,875); Ruskii Korabili (MDL 10,081); YouTube and Telegram channels: Ковчег - семья и вера [Shrine - Family and Faith]; Sare și lumină [Salt and light]; and the website moldovenii.md.

The coordinated inauthentic behaviour observed in the context of the parliamentary elections was manifested in the amplification of narratives on social networks, which aim to discredit the electoral process and the institutions that organize the elections. The promoted narratives referred to: repair works on 7 bridges across the Dniester before the elections – a strategy for limiting the right to vote; closing the 12 polling stations for voters from the left bank of the Dniester under the pretext of Russian influence; the ballot papers sent for postal voting do not contain all electoral competitors; election falsification is being prepared / annulment of elections is being prepared / there are no free elections in Moldova.

Observation of the financing of the electoral campaign. According to the data published on the official website of the CEC, during the observation period, 22 out of the 23 electoral competitors submitted a financial report for the week until 15 September 2025, and 21 out of the 23 registered electoral competitors submitted reports for the week until 22 September.

According to the reports submitted to the CEC, the amount of income declared by electoral competitors for the period from 8 to 21 September is MDL 23,842,469, of which MDL 2,398,142 are from material donations. The most income was declared by PAS – 27% of the total, followed by the Patriotic EB – 22%, PN – 19%, and the Alternative EB – 12%.

Regarding expenses, we note that the 23 electoral competitors declared expenses totalling MDL 23,010,755, of which MDL 2,390,142 were from material donations. The most expenses were declared by PAS – 28% of the total reported expenses, followed by the Patriotic EB – 22%, the Alternative EB and PN – 14%. In terms of the destination of the reported financial expenses, the most – 44% – were

for the production and dissemination of advertising spots, followed by expenses for promotional materials – 22%, online advertising – 10%, and advertising on social networks – 7%.

According to Promo-LEX OM estimates, unreported expenses amounted to at least MDL 693,243. The most unreported expenses were incurred by PAS – 43% of the total estimated expenses, followed by PPDA – 12%, LOC – 10%, and UCSM – 7%.

Hate speech. Between 5 and 18 September 2025, at least 72 cases of hate speech were identified, 62 of which occurred in an electoral context. About 66% of cases of hate speech were identified in mobile applications and social networks. In total, the 62 cases of hate speech were viewed by more than 2,600,000 people. Most often, hate speech was generated by men (36 cases) and people aged 35 to 50 (22 cases). The hate speech identified was based on different criteria, such as professional activity, political affiliation, opinion, sexual orientation, gender identity, health, and others.

INTRODUCTION

Report no. 4 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. This report contains the results of the observation of the last two weeks of the electoral campaign – from 11 to 24 September 2025. The main findings and trends in the current report refer to the work of electoral bodies and public authorities and campaign activities carried out by competitors. The observation of the financing of electoral competitors was carried out from 8 to 21 September, and hate speech and incitement to discrimination were monitored from 5 to 18 September.

During the course of the mission, Promo-LEX is to present four interim election 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 analyse 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. In addition to electoral competitors, the Promo-LEX OM will also estimate the expenses of political entities not registered as electoral competitors, but which continue to carry out political activity during the electoral campaign. 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 analyse 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 409 static short-term observers (STOs). Their effort will be supplemented by 382 STOs, who will visit the rest of the polling stations being grouped into 191 mobile teams, two observers per team.

Promo-LEX will observe every polling station set up for voters in the Transnistrian region. 129 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.

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

I. LEGAL FRAMEWORK

Limiting the activity of a constituent party of an electoral bloc

On 25.09.2025, the Central Court of Appeal (CCA) ruled on the limitation of PRIM's activity as a security measure, following the appeal of the Ministry of Justice of 19.09.2025,² by which it requested applying this measure for the duration of examination of the case, until a decision on the merits is pronounced.³ The appeal of the Ministry of Justice was initiated on the basis of a CEC decision,⁴ whereby the electoral authority presented certain suspicions regarding the illicit nature of PRIM financing.

We shall remind that the court session scheduled by the CCA for 23.09.25⁵ was postponed, because PRIM raised the exception of unconstitutionality of the provisions of art. 21 para. (3²) of the law on political parties.⁶ The Constitutional Court has recently registered another notification raising the exception of unconstitutionality of several provisions of art. 21 of Law no. 294 of 21 December 2007 on political parties, including para. (3²). On 25.09.2025, the Court declared PRIM's notification inadmissible,⁷ noting that "there may be cases in which the choice of measures available to the authorities in order to respond to an urgent social need in connection with perceived negative consequences, given the existence or activities of an association, is inevitably limited. The state is entitled to take preventive measures against political parties for the protection of democracy. The state cannot wait until the political party takes power and begins to take concrete steps to implement a policy incompatible with the standards of the Convention. Where the danger of that policy has been sufficiently established and is imminent, the state can reasonably prevent the application of such a policy before the attempt to implement it by means of concrete steps damages the social peace and democratic regime of the country."

According to art. 21 para. (5) of the Law on political parties, during the period of limitation of activity, the political party is forbidden to participate in elections and referendums, either individually or jointly.

At the same time, according to art. 21 para. (3⁴), the ruling on the application or rejection to apply the security measure of limitation of activity of the political party may be appealed on points of law separately from the merits of the case. The application for appeal on points of law shall be examined by the Supreme Court of Justice within 5 days. Simultaneously, according to art. 181 para. (3) of the Code of Civil Procedure, the filing of an appeal on points of law against the ruling on securing the action does not suspend the examination of the case and the execution of the ruling.

Thus, even if PRIM were to file the appeal to the SCJ on 25.09.2025 (the date of the ruling), there is a probability that the SCJ would rule on the fifth, last day of the legal term provided by law for the examination of the appeal against the security measure.⁸ Respectively, if the SCJ were to rule after the voting day, on 30 September 2025, it would make PRIM's right to an effective appeal illusory.

In another train of thought, according to art. 115 para. (2), (3), and (5) of the Electoral Code, electoral competitors have the right to request, at least 10 days before voting day, the following changes to be made to the list of candidates: a) change of place on the list or exclusion of the candidate from the registered list; b) withdrawal of the entire list of candidates. Under para. (1) and para. (2) lit. a) of this article, the decision to withdraw or change the list of candidates shall be adopted by the political party or electoral bloc that submitted the list of candidates, in compliance with the provisions of art. 7 para. (2) lit. b) of Law no. 5/2006 on ensuring equal opportunities for women and men and art. 68 para. (3) of the Electoral Code, and shall be submitted to the Commission. The Central Electoral Commission shall refuse to make changes that fail to meet the requirements set out in para. (1)–(3) and shall issue a decision in this regard.

² [Press release](#) of the Ministry of Justice of 19.09.25.

³ Art. 21 para. (3²) of Law no. 294 of 21.12.2007 on political parties.

⁴ [CEC Decision](#) no. 3993 of 17.09.25 regarding complaint no. CEC-10AP/6 of 2 September 2025 and notification no. CEC-7/22684 of 5 September 2025.

⁵ [Information](#) about the CCA meeting of 23.09.25.

⁶ [Notification](#) no. 202g of 24.09.25 filed by PRIM with the Constitutional Court.

⁷ Constitutional Court [Decision](#) no. 137 of 25 September 2025 on inadmissibility of notification no. 202g/2025 regarding exception of unconstitutionality of art. 21 para. (3²) of Law no. 294 of 21 December 2007 on political parties.

⁸ According to art. 95 para. (1) and (8) of the [Electoral Code](#), during the electoral period, the general term for filing complaints is 3 days, which is calculated from the day following the day on which [...] the decision is adopted. The filing of actions in administrative litigation, as well as the exercise of appeals against judicial acts shall be carried out within the period set in para. (1).

In accordance with art. 68 para. (3) of the Electoral Code, the lists of candidates for parliamentary and local 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.

Under the conditions of art. 102 para. (5) lit. g) of the Code, the annulment of registration is applied by decision of the electoral body that registered the electoral subject in case of non-compliance with the requirements established in art. 68, 112, 113, and 139.

Having analysed the list of candidates of the Patriotic EB,⁹ we found that in the top ten positions there are two women candidates for the position of MP put forward by PRIM. Thus, given the limitation of PRIM activity, if these two candidates were removed, a new numbering of the top ten candidates would start, of whom seven are men and three are women. In such a way, the rule established in art. 68 para. (3) of the Electoral Code would be violated, and the Patriotic EB would risk having its registration as electoral competitor annulled. We shall mention that 25 candidates on the Patriotic EB's list of candidates were put forward by PRIM. Moreover, the limitation of PRIM's activity could also have an impact on the name of the electoral bloc and the electoral symbol used, the financing of the electoral campaign from the sources of PRIM, the distribution of advertising in which PRIM representatives appear, etc.

In the opinion of the Promo-LEX OM, the unlawful action or inaction of a constituent part of the bloc cannot in itself serve as a basis for annulling the registration of the entire electoral bloc. This position is due on the factual and legal circumstances of this case in the parliamentary elections of 28 September.

Taking into account the fact that the legislator allows changing the lists of candidates at least 10 days before voting day, we find that the Patriotic EB would be unable to change the list of candidates due to circumstances beyond its control.

However, in this context we shall remind that, on 24.09.2025, the CEC issued a decision concerning the PPDA's list of candidates. The CEC excluded some of this party's people and obliged the electoral competitor to repair, within 24 hours, the non-conformities related to the mandatory criteria of meeting the gender quota, reserving the right to cancel its registration otherwise.

Given the above, the Promo-LEX OM finds it appropriate for the Patriotic EB to be treated similarly to PPDA, taking into account the judicial practice¹⁰ and the precedents established by the CEC in these elections, thus ensuring equal treatment of electoral competitors.

In principle, the Promo-LEX OM recommends that the future Parliament review art. 115 of the Electoral Code and, where appropriate, reduce the 10-day period during which the list of candidates can be changed, or establish exceptions to this rule for cases where the list could be changed in justified circumstances even up to the day before voting day, such as described in this case.

⁹ [List](#) of candidates for the position of MP of the Patriotic EB.

¹⁰ [CCA judgment](#) of 26.08.25 in PPMM v. CEC; CCA judgment of 29.08.25 in NOI v. CEC.

II. ELECTORAL BODIES AND PUBLIC ADMINISTRATION

2.1. The work of the Central Electoral Commission

Approval and transparency of decisions on the organization and conduct of elections. The Central Electoral Commission (CEC) continued providing public access to its meetings, both through physical participation and through online broadcasts, thus ensuring transparency of the decision-making process. During the monitored period, the CEC held 10 meetings and adopted 126 decisions, most of them on matters essential for the organization and conduct of the parliamentary elections. The decisions adopted by the CEC were made public within the deadlines stipulated by the legislation.

Regarding the CEC decision to relocate some polling stations established for voters from the left bank of the Dniester. At the meeting of 25 September 2025, the CEC decided to relocate five polling stations out of the 12 established for voters from the left bank of the Dniester. The polling stations organized in Varnita and Cocieri, which are practically in highest demand, were among the ones relocated. For six other polling stations, reserve locations were preliminarily established. Only the polling station organized in Chisinau was not affected by the decision. It should be mentioned that this issue was introduced into the agenda at the beginning of the meeting, and at least one member noted that he had no time to get acquainted with the content of the draft decision.

According to the CEC, this decision was adopted in the context of the recommendations of the General Police Inspectorate (GPI), issued on 22 September 2025. The GPI argued its request by the existence of major security risks in the security zone, while the intervention of the law enforcement would be difficult, since it would require the consent of the Joint Control Commission. The position of the GPI was also supported by the references of the Security and Intelligence Service (SIS) and the Bureau for Reintegration Policies (BRP).

The Promo-LEX OM finds this decision extraordinary, approved just two days before the elections, which will limit the access of Moldovan citizens from the Transnistrian region to polling stations. At the same time, according to the legislation, the responsibility to create optimal conditions for the unimpeded exercise of the constitutional right to elect and be elected rests with the Central Electoral Commission. In the context in which the law enforcement cannot guarantee an adequate level of security, the CEC decision seems to have been adopted in a balance between protecting the right to vote and the need to ensure the security of the electoral process.

Accreditation of observers. The CEC continued the process of accrediting observers. During the current monitoring period, 847 observers were accredited, of whom 456 are national and 391 are international (including experts). At the end of the electoral campaign, we attest a significant increase in the interest of international observers and experts for elections in Moldova, which is about a fourfold increase in the number of accredited persons, compared to the previous reporting period.¹¹

In total, the CEC accredited 2,965 observers from 53 national and international institutions to monitor the parliamentary elections of 28 September 2025 (as of 24.09.2025). Of these, 2,449 are national observers and 516 are international observers and experts. The absolute majority of national observers was accredited by two organizations, namely Promo-LEX, with 1,218 observers (50%), and the Moldovan Lawyers' Union, with 1,170 observers (48%).

Compared to the 2024 elections, when 1,905 observers from 56 national and international institutions were accredited at the same stage, there is a significant increase in the number of observers accredited for the 2025 elections.¹² The increase is due to a greater number of accredited national observers. We believe that the increased number of observers, provided that they work according to regulations, will strengthen the transparency of the electoral process.

Confirmation of representatives and trusted persons. In these elections, 16 out of the 23 competitors confirmed representatives at the CEC (12 political parties, 3 electoral blocs, 1 independent candidate), respectively six competitors¹³ did not use this mechanism of representation of interests.

¹¹ [Report no. 3](#). Promo-LEX OM for the parliamentary elections of 28 September 2025, p. 11.

¹² [Report no. 4](#). Promo-LEX OM for the presidential election and the constitutional referendum of 20 October 2024, p. 12.

¹³ Together EB, PAM, PPM, UCSM, IC Andrei Năstase, IC Victoria Sanduța, and IC Tatiana Crețu.

During the reference period of this report, the CEC confirmed two trusted persons of MRM. Thus, for these elections, trusted persons were confirmed only by PN (69 persons) and MRM (2 persons). We found that in these elections competitors still avoid using the institution of trusted persons.¹⁴ Instead, they prefer to declare volunteers for the conduct of electoral activism, a procedure that does not require prior confirmation and compliance with any conditions, as in the case of those imposed on trusted persons.¹⁵

Confirmation of journalists. During the reporting period, the CEC confirmed 66 journalists, about 20 more than in the entire confirmation period so far. Thus, for the elections of 28 September, the CEC confirmed a total of 111 journalists from 17 media outlets in the country,¹⁶ in order to cover and monitor the parliamentary elections. We see an increase of about 50% in the number of confirmed media representatives, compared to the 2024 elections.

We shall remind that journalists legitimized by media outlets and confirmed by the CEC have access to the meetings of electoral bodies, electoral operations, and electoral information under the same conditions as observers and in accordance with the provisions of the Regulation on the coverage of elections by media outlets.¹⁷

Approval of public interest messages. Having analysed the CEC website, we found that during the reporting period, 13 decisions were adopted regarding the approval of public interest messages, with the following electoral themes: electoral mobilization/motivational spots – 4; explanation of voting procedures – 6; combating electoral corruption – 3.¹⁸

Authorization to conduct opinion polls and exit polls. By the time of publication of this report, the CEC authorized 11 entities with the right to conduct 16 opinion polls on the political preferences of voters.¹⁹ At the same time, the CEC examined and rejected the request of „DATE INTELIGENTE” S.R.L. regarding the authorization to conduct an exit poll on the day of the parliamentary elections of 28 September 2025. The refusal was based on certain doubts regarding the financing of the exit poll.

The promotion of unauthorized online polls has become a distinctive feature of these elections. One of the most promoted polls in the reporting period is the one attributed to AtlasIntel, which, according to the Meta report for the period of 8-21 September 2025, spent about MDL 35,360.²⁰

On 24 September 2025, in Buiucani sector of Chisinau, a Promo-LEX observer found a case of unauthorized conduct of a sociological survey on topics relevant to the electoral process. It was an interviewer, who presented himself as representing the Public Opinion Fund (Fondul Opiniei Publice, FOP) and was doing face-to-face interviews. FOP was not identified in the list of subjects that have the right to conduct surveys. According to the CEC website, at the time of writing this report, FOP was not in the list of subjects who authorized the conduct of a sociological survey.

Certification of electoral officials. The certification exams of electoral officials, according to the extended program,²¹ will be held until 26 September 2025. According to the information obtained by observers from the CCET (on 24.09.2025), in the certification session held in 2025, in the context of preparing for the current parliamentary elections, 7,626 potential electoral officials obtained the qualification certificate. A total of 9,402 applicants participated, the promotion rate being 82.3%. In the period of 2023-2025, the CCET issued a total of 27,200 qualification certificates. We shall remind that a little over 20,000 citizens worked as electoral officials (in DEC and PEBs) in the elections in autumn 2024.

2.2. Activity of district electoral councils

¹⁴ In the 2024 presidential election, only 5 out of 11 competitors sought confirmation of trusted persons. [Final report](#). Promo-LEX Observation Mission for the presidential election and constitutional referendum of 20 October 2024. p. 17.

¹⁵ [Regulation](#) on the status and activity of trusted persons of electoral competitors, approved by CEC Decision no. 1130 of 18 July 2023

¹⁶ PP „Observatorul de Nord” SRL; IP Radio Orhei; AO Nord Press Club; PP Exclusiv Media SRL; AO Academia de Creație și Inovații Mediatice; AO Asociația Reporterilor „NORD MEDIA”.

¹⁷ CEC [Decision](#) no. 1137 of 27.07.2023 on approval of the Regulation on the coverage of elections by media outlets.

¹⁸ [Messages](#) of public interest approved by the CEC. Parliamentary elections of 28 September 2025.

¹⁹ [Authorization](#) to conduct opinion polls and exit polls.

²⁰ [AtlasIntel](#). Meta ad library.

²¹ [Report no. 3](#). Promo-LEX OM for the parliamentary elections of 28 September 2025, p. 12.

Compliance with the work schedule and access of observers to information. During the reference period of the report, Promo-LEX observers made 76 visits to DEC. All councils were found to be open during working hours, and electoral officials were cooperative and responsive to observers' requests for electoral information and materials.

Change in the composition of DECs. During the reference period, the Promo-LEX OM found two cases of change in the nominal composition of second-level district electoral councils (DECs) – DEC no. 1 Chisinau and DEC no. 27 Riscani. These changes were determined by the resignation applications submitted by the members previously appointed by PSRM and PCRM.

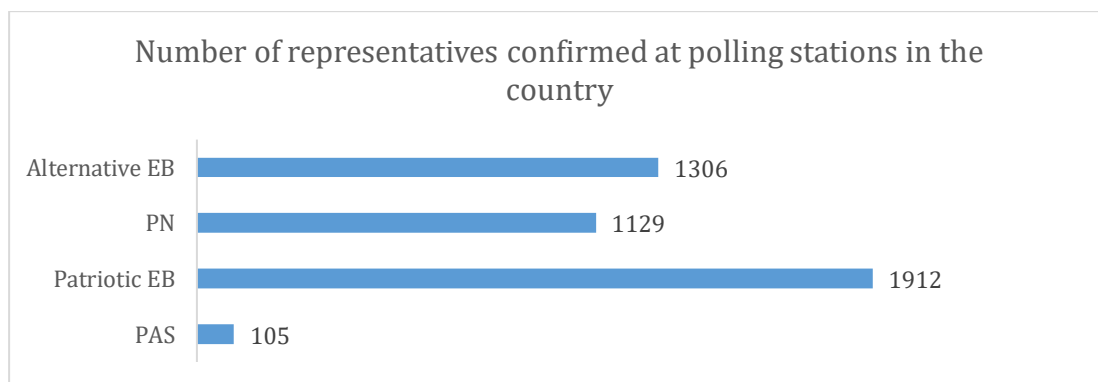
Difficulties in the work of electoral bodies. According to Promo-LEX observers, following discussions with members of DECs, it was found that at the initial establishment of PEBs, DEC no. 36 ATU Gagauzia and DEC no. 1 Chisinau faced a shortage of members. Thus, at least 14 PEBs under DEC no. 36 ATU Gagauzia and 3 PEBs under DEC no. 1 Chisinau had a composition reduced to 60% or even less. At the same time, at least 57 PEBs under DEC no. 1 Chisinau and 27 PEBs under DEC no. 36 ATU Gagauzia lacked 2-3 members.

The main causes identified were suspicion of electoral corruption and failure to pass CEC integrity checks in the case of DEC no. 36 ATU Gagauzia, as well as the lack of certified persons in the case of DEC no. 1 Chisinau. According to Promo-LEX observers, on 25 September 2025, just three days before the parliamentary elections, the situation with filling the vacant positions in precinct electoral bureaus was not yet fully resolved. In DEC no. 1 Chisinau, there was a lack of about 5% of the total number of PEB members, and in DEC no. 36 ATU Gagauzia, 12 members in 8 electoral bureaus were missing, which affects the full functionality of the bureaus. This shortage is to be covered by district electoral councils as a matter of urgency, so that by 27 September 2025, i.e. the day before the elections, all candidacies are approved and confirmed.

Confirmation of representatives of electoral competitors. According to the information reported by observers and the analysis of DEC decisions published on the CEC website, by 24 September 2025, 10 representatives from four electoral competitors were confirmed in electoral districts: PAS (1 representative – DEC no. 15 Dubasari), Alternative EB (6 representatives – DEC no. 36 ATU Gagauzia, DEC no. 15 Dubasari, DEC no. 29 Soroca, DEC no. 28 Singerei, DEC no. 19 Glodeni, and DEC no. 4 Anenii Noi), PN (2 representatives – DEC no. 24 and DEC no. 29 Soroca), and Patriotic EB (1 representative – DEC no. 26 Rezina). Once confirmed, they can defend the interests of the subject who appointed them within the electoral body, in electoral disputes, as well as in court.

According to the data reported by Promo-LEX observers and the analysis of DEC decisions, at PEB level in the country, by 24 September, four electoral competitors confirmed their representatives, totalling 4,452 persons: Alternative EB – 1,306 persons, PN – 1,129 persons, Patriotic EB – 1,912 persons, and PAS – 105 persons.

Chart 1



By 24 September 2025, the following electoral competitors confirmed their representatives at polling stations abroad, a total of 635 persons: Alternative EB – 238 persons, PN – 170 persons, PPDA – 78 persons, Andrei Năstase – 11 persons, NOI – 100 persons, and AUR – 38 persons.

Accreditation of observers. According to observations from the territory, 13 observers were accredited and 15 journalists from two media outlets were confirmed at DEC level. DEC no. 36 ATU Gagauzia accredited 13 observers from the Pilgrim-Demo Public Association and confirmed 13 journalists from the public broadcaster OK GRT, and DEC no. 14 Drochia accredited two journalists from SRL Satelrom-TV.

Non-compliance with incompatibilities by members of electoral bodies. According to the findings of Promo-LEX observers, several cases of non-compliance with incompatibilities by members of electoral bodies were reported during the reference period. These situations concerned both district electoral councils and precinct electoral bureaus:

- Promo-LEX observers reported that on 16 September 2025, a member of DEC no. 8 Cantemir, appointed by PSRM, participated in an electoral event organized by the candidate for the position of MP Igor Dodon.

- On 19 and 23 September 2025, the Orhei Police Inspectorate filed two notifications concerning several members of electoral bureaus, who were sanctioned under art. 47 of the Contravention Code (“passive electoral corruption”). As a result, 9 PEB members were removed from office and sanctioned with the complementary measure of prohibition to participate in the work of electoral bodies for a period of 2 years. Subsequently, on 24 September, Orhei PI filed a new notification concerning another 20 members sanctioned for the same contravention. The DEC is expected to make a decision regarding the examination of this notification.

The situation was different for PEB 25/62 and PEB 25/10. Two members who were on the list of sanctioned persons provided by the Orhei PI filed applications for resignation, accepted by the electoral authority, while the other members concerned were revoked by law and sanctioned with a prohibition to work in electoral bodies for 2 years. This difference in treatment reveals the need for a uniform and transparent application of sanctions. We shall note that, although Promo-LEX observers were previously informed about the existence in practice of a mechanism for checking the integrity of potential members of electoral bodies, the reported situations demonstrate shortcomings in the application of this mechanism.

In this regard, Promo-LEX recommends to establish by law a clear mechanism for checking the integrity of candidates for membership in electoral bodies and to explicitly define verification criteria and procedure, so that the process is transparent and uniformly applied.

- Promo-LEX observers reported that a member of PEB no. 11/01 Cimislia participated in two electoral meetings with Patriotic EB’s candidates for the position of MP, on 12 and 21 September 2025.

- On 19 September, in Chetrosu v., Anenii Noi d., an electoral meeting organized with the staff of the local gymnasium was attended by PCRM’s MP Nicolai Rusol, Patriotic EB’s candidate Alexandru Mațarin, and PCRM’s first secretary Veaceslav Bondari. According to Promo-LEX observers, two members and the secretary of PEB 4/12 were present at this event.

- On 19 and 24 September 2025, the Promo-LEX OM was notified by the Patriotic EB that members of PEB 38/207 and PEB 4/18 allegedly carried out electoral activities in favour of an electoral competitor through social networks, publishing the competitor’s texts and slogans and distributing articles and messages to the detriment of other electoral competitors.

We shall remind that the regulation on the activity of precinct electoral bureaus clearly establishes the incompatibilities and obligations of the members of electoral bodies, including the prohibition to conduct electoral activities as subjects directly involved in the electoral process or to admit improper influences on the electoral process, and the prohibition to engage in electoral activism in favour of or against electoral competitors.

2.3. Activity of precinct electoral bureaus

Between 8 and 22 September, Promo-LEX observers visited at least 1,418 electoral bureaus in order to observe and document the process of organizing the elections of 28 September 2025. Having processed the reported information, we found the following:

- PEBs' work schedule was respected in the proportion of 96%. Most cases when PEBs were closed were found in Chisinau municipality (32 cases). We shall point out that in the absolute majority of the 4% of PEBs that were closed, the gates of public institutions (preschool/school/medical), which do not work on Saturdays and Sundays but host the offices of PEBs, were closed/locked during the working hours of PEBs.
- Only 68% of (visited) PEBs made public their composition, and 90% – the working hours, thus not fully ensuring compliance with the legal obligation to inform the public about the work of the bureaus.
- In the case of 68% of (visited) PEBs, voters were not informed about the electoral competitors included in the ballot paper for the parliamentary elections.
- The members of at least 7 PEBs lacked understanding of the open voting procedure when electing their leadership. In these PEBs, the leadership was elected by secret ballot.
- Leadership positions are mostly held by women (89% of presidents and 97% of secretaries). Gender balance in the leadership of the electoral body was found only in 174 electoral bureaus (12% of the 1,418 visited).
- Accessibility could be assessed in 1,376 PEBs out of the 1,418 visited, depending on the PEB status at the time of the visit (open/closed). Thus, only 35% of the visited electoral bureaus are accessible to vulnerable groups, 18% are partially accessible, and 47% are inaccessible. The Promo-LEX OM points out that, given that 62% of PEB premises are identical to the premises of the polling station, the cooperation of entities (LPA, DEC, PEB) in order to ensure the accessibility of the electoral process, including the adaptation of premises, is essential. The need to ensure accessibility becomes urgent, especially for the localities and sectors to which voters with special needs are assigned.

Confirmation of the composition of precinct electoral bureaus. Having analysed the DEC decisions on the establishment and modification of the nominal composition of PEBs, in the 1,418 PEBs visited by Promo-LEX observers, we find the following:

- In 59 PEBs (4% of those visited), the established numerical composition is five members, in 420 PEBs (30%) – seven members, in 528 PEBs (37%) – nine members, and in 411 PEBs (29%) – 11 members.
- According to the initial establishment decisions, the 1,418 visited PEBs were to have 12,497 members. Of these, 12,089 were actually nominated, reflecting a shortage of 408 members in total.
- Gender equality is not ensured in the establishment of electoral bodies, the share of women members of PEBs being significantly higher than that of men (86% versus 14%). Moreover, there are no men working in 532 PEBs (37% of the 1,418), and the number of men in 657 PEBs (46% of the 1,418) is 1-2 persons.
- The appointment of members to the electoral body by the entities that have this right (local councils and parliamentary parties) was carried out differently: local councils – 4,804 members, PAS – 1,372 members, PSRM – 1,301 members, PCRM – 686 members, and REO – 3,926 members. It should be noted that in the case of 24 PEBs, local councils did not appoint any members, as they did not hold a meeting to make the designations to electoral bodies.

Changes in the composition of precinct electoral bureaus. According to Promo-LEX observers, in the 1,418 visited PEBs, at least 178 changes in the membership of electoral bodies were identified. The most frequent changes were initiated by the CEC from the REO, which occurred in 85 cases (about 47.7% of the total). In these situations, the CEC appointed members from the Register of electoral officials, which represents 105 new appointments (59% of the total registered after changes).

The second most frequent changes were made by local councils, which initiated 43 changes (24.1% of the total), having thus appointed 28 new members (15.7%). Political parties come next, with smaller shares:

the Party of Socialists of the Republic of Moldova (PSRM) was the initiator in 20 cases (11.2%), appointing 21 members (11.8%); the Action and Solidarity Party (PAS) initiated 19 changes (10.7%), appointing 16 members (9%); and the Party of Communists of the Republic of Moldova (PCRM) had 11 cases (6.1%), appointing 8 members (4.5%).

These data reflect the fact that the CEC has a central role in the process of adjusting the composition of electoral bureaus, intervening almost twice as frequently as local councils and more than four times more frequently than each of the political parties. At the same time, the high percentage of members appointed by the CEC indicates that the institution has a decisive weight in ensuring the functionality of PEBs, especially in situations where local councils or parties failed to make the necessary appointments.

Receiving and ensuring access to voters lists. In accordance with art. 61 para. (9) of the Electoral Code and the CEC's calendar of activities, voters lists were to be sent to PEBs through DEC's by 8 September 2025 inclusive.

Following the discussions of Promo-LEX observers with electoral officials, we found that 1,359 PEBs (99%) of the 1,364 PEBs (which had received voters lists by the time of the observers' visit) received voters lists in due time.

We shall point out that according to pt. 88 of the CEC's calendar of activities, the lists were to be made available to the public for verification starting 8 September.

According to art. 88 para. (9) of the Electoral Code, observers shall have access to all electoral information, including voters lists. Contrary to the mentioned legal provisions, out of the total of 1,359 PEBs that were open during the visits made between 8 and 22 September 2025, in 33 cases the observers did not have access to voters lists.

Based on discussions with bureau members, Promo-LEX observers found the following deficiencies in voters lists:

- Presence of deceased persons in lists (26 cases).
- Absence of voters in the main lists (12 cases).
- Wrong assignment of voters to polling stations (33 cases).
- Wrong assignment of voters to another locality (12 cases).
- Address errors (7 cases).

Following the identification of deficiencies, 80 PEBs made changes to voters lists. We shall point out that in most cases where deceased persons were identified on voters lists, according to the interviewed electoral officials, their deletion is not possible due to the lack of confirmatory documents, since these persons died abroad.

Use of public spaces for meetings with voters. According to Promo-LEX observations, at least 205 cases of use of public spaces for meetings with citizens, organized by 13 electoral competitors, were reported. The most meetings were held by PAS (80), followed by the Patriotic EB (53), the Alternative EB (18), PN (17), and PSDE (10). CUB and MRM organized 6 meetings each, while PAM and PPMM – 5 each. LOC had 2 meetings, while ALDE, PPDA, and AUR – one each.

Also, the Promo-LEX OM found a case in which the local public administration refused to authorize a meeting of the Patriotic EB with voters, on the grounds that it was to be held in a different place than the one provided by the LPA.

III. ELECTORAL COMPLAINTS AND DISPUTES

3.1. Notifications registered and examined by the CEC

During the observed period, electoral competitors submitted five notifications, two of which were submitted by the Patriotic EB, and one by PAS, PLDM, and a citizen, each. The subject matter of those notifications was: violations related to electoral advertising, misuse of administrative resources, prohibited electoral activism. Two out of the five notifications have not been resolved by the CEC by the time of writing this report, and the examination term of the other three notifications was 5-7 days.

1. On 12.09.2025 and 14.09.2025, the CEC registered two notifications sent by the Patriotic EB,²² which alleged violation of the rules on the provision, distribution, and dissemination of electoral advertising and public interest messages on the territory of Cahul d. and Anenii Noi d. by PAS exponents. The authors of the notification showed that, on 11.09.2025 and 12.09.2025, on the pavilions of transport waiting stations in Pelinei and Alexanderfeld, Cahul d., and on a supplement built above a billboard in Delacau v., Anenii Noi d., several electoral posters accompanied by PAS symbols were found. At the time of writing this report, the CEC has not yet resolved these notifications.

2. On 12.09.2025, the CEC registered a notification sent by a citizen,²³ who alleged that Radu Marian and Anastasia Nichita, candidates on PAS lists, published an electoral spot on TikTok, using administrative resources and financial promises. The CEC examined the notification within seven days and sent it to the GPI according to its competence,²⁴ in line with art. 48¹ para. (7) of the Contravention Code.

3. On 15.09.2025, the CEC registered a notification sent by PLDM,²⁵ which challenges the actions of the Moldovan President Maia Sandu in the context of her visits to Germany and Italy in the period 01.05-10.09.2025. The authors of the notification claim that Maia Sandu used these visits for electoral purposes and sent messages of electoral mobilization. Such statements made in her position of head of state during visits financed from public money are allegedly tantamount to turning the presidential institution into an electoral actor. The CEC examined the notification within five days and found lack of grounds for CEC intervention.

4. On 18.09.2025, the CEC registered a notification filed by PAS,²⁶ in which it invoked that Sinilga Școlnic, head of Ciocana sector administration in Chisinau, was present at the electoral tent of the Alternative EB during working hours. During the event, she shared newspapers and talked with citizens. The applicant considers that Sinilga Școlnic violated the legal provisions related to the use of administrative resources. The CEC has not yet resolved this notification.

3.2. Complaints registered and examined by the CEC

During the observed period, 41 complaints were submitted to the CEC, the subject matter of which referred to: prohibited electoral activism (11 cases), violations related to electoral advertising (11 cases), creation of a camouflaged electoral bloc (one case), misuse of administrative resources (18 cases) (see Chart 2). The term of examination of complaints by the CEC ranged from 1 to 5 days. The Patriotic EB filed 20 complaints, the Alternative EB – 16, PNM – 2, PN – 1, PPDA – 1, PAS – 1.

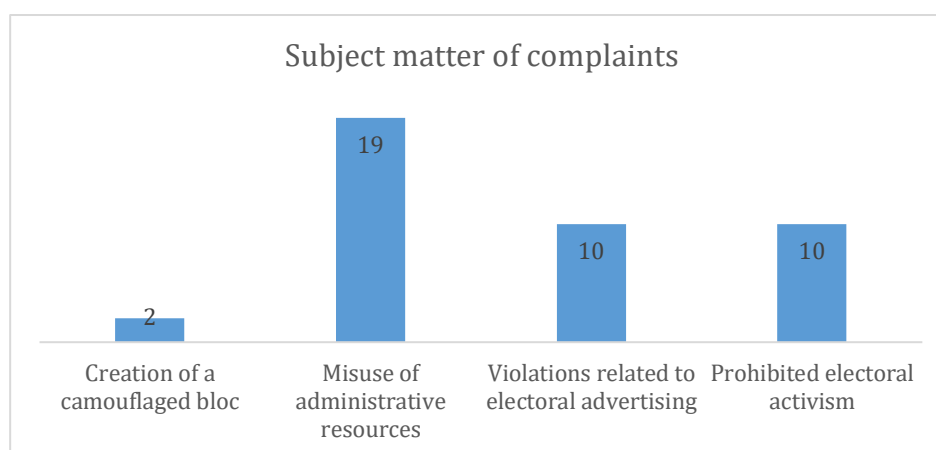
²² Notifications registered by the CEC under no. [CEC-7/22977 of 12.09.25](#) and [CEC-7/23008 of 15.09.25](#).

²³ Notification registered by the CEC under no. [CEC-9/618 of 12.09.25](#).

²⁴ Reply no. [CEC-8/9017 of 19.09.25](#).

²⁵ Notification registered by the CEC under no. [CEC-7/23007 of 15.09.25](#).

²⁶ [Notification](#) registered by the CEC under no. CEC-7/23194 of 18.09.25.



The complaints filed to the Central Electoral Commission are shown in the generalizing table below.

Table 1. Complaints filed to and resolved by the CEC between 11 and 24 September

No.	Author of complaint	Subject matter of complaint	No. of complaints	Term of settlement by the CEC (days)	Status
1	Patriotic EB	Prohibited electoral activism	9	2 days	Settled
2		Violations related to electoral advertising	1	2 days	Settled
3		Misuse of administrative resources	10	3 days	Partially settled
4	Alternative EB	Violations related to electoral advertising	9	1-2 days	Partially settled
5		Creation of a camouflaged electoral bloc	1	4 days	Settled
6		Misuse of administrative resources	6	1-5 days	Settled
7	PNM	Creation of an electoral bloc	1	4 days	Settled
8		Misuse of administrative resources	1	1 day	Settled
9	PN	Prohibited electoral activism	1	2 days	Settled
10	PPDA	Misuse of administrative resources	1	2 days	Settled
11	PAS	Misuse of administrative resources	1	2 days	Settled

The complaints filed to the CEC are as follows:

1. On 11.09.2025, the CEC registered a complaint of the Patriotic EB,²⁷ which pointed to the actions of prohibited electoral activism by the representative of the State Chancellery in Comrat, Serghei Cernev. The CEC examined the complaint within two days and sent it to the State Chancellery for clarification of the circumstances, but without intervening in any way.²⁸

2. On 11.09.2025, the CEC registered a complaint of the Alternative EB²⁹ invoking misuse of administrative resources and violation of the rules of distribution of electoral advertising materials by PAS, namely their distribution on 09.09.2025 in the premises of the Centre of Excellence in Medicine and Pharmacy "Raisa Pacalo". The CEC examined the complaint within two days and sent it to the Central Police Inspectorate and the GPI³⁰ for its examination in the light of the competence provided by art. 48¹ para. (7) and art. 50 of the Contravention Code.³¹

The Promo-LEX OM notes that, in contrast to the previous practice of examining complaints concerning the misuse of administrative resources, the CEC in the application addressed to the GPI and the Central PI made reference to the rules applicable to the case, which should facilitate the examination of the complaint by the investigating agents of the GPI.

²⁷ Complaint no. [CEC-10Ap/29 of 11.09.25.](#)

²⁸ Reply no. [CEC-8/8908 of 13.09.25.](#)

²⁹ Complaint no. [CEC-10Ap/30 of 11.09.25.](#)

³⁰ Reply no. [CEC-8/8915 of 13.09.25.](#)

³¹ Art. 48¹ para. (7) of the Contravention Code provides for contravention liability for misuse of administrative resources, and art. 50 for violating the rules on electoral displays and

3. On 11.09.2025, the CEC registered a complaint of the Alternative EB³² invoking the creation of a camouflaged electoral bloc between PAS and PDA, presenting as evidence an audio recording, in which Dinu Plîngău allegedly talked to other people about possible political scenarios and an alleged coordination and political association with PAS. On 12.09.2025, the CEC registered a complaint filed by PNM,³³ which contained similar facts and requests. The CEC joined the complaints, examined them in four days, and rejected them,³⁴ stating that “the general claims regarding alleged links between PAS and the Dignity and Truth Platform (PDA) are not consolidated by documents, joint public actions, or other verifiable manifestations.”

We reiterate³⁵ that the introduction into the Electoral Code of the concept of “camouflaged electoral bloc” does not have legal certainty and will generate further interpretations, given its ambiguity in the text of the law.

4. On 12.09.2025, the CEC registered a complaint of the Alternative EB,³⁶ which reported facts of violation by PAS of the rules concerning electoral advertising, manifested in the placement of advertising on the fence of a household in Chisinau, Meșterul Manole St. The CEC examined the complaint in one day and sent it³⁷ to the GPI, Ciocana Police Inspectorate, and the administration of Ciocana sector, Chisinau municipality, for examination according to competence.

5. On 12.09.2025, the CEC registered a complaint of PNM³⁸ invoking misuse of administrative resources by PAS, manifested in the presentation of Dorin Recean as prime minister at a press conference held by the candidate for the position of MP Igor Grosu. The complainant also claimed that Dorin Recean promotes electoral messages using his official Facebook page, where he presents himself as prime minister and government official. The CEC examined the complaint in one day and sent it to the GPI.³⁹

Compared to case no. 2 of this list, the CEC did not refer to the legal rules relevant to the deed notified, limiting its reply only to the competence of examination, provided by art. 400 and 48¹ para. (7) of the Contravention Code.

6. On 12.09.2025, the CEC registered a complaint of the Alternative EB⁴⁰ invoking that Dorin Recean, being present at an electoral campaign activity, misused administrative resources, namely, as acting prime minister, he said in his speech the following: “On 28 September, we vote for a pro-European parliamentary majority of PAS.” The complainant also noted that Dorin Recean uses the official Facebook page of the prime minister, in which he made publications containing the PAS symbol. The CEC examined the complaint in one day and sent it to the GPI⁴¹ for examination according to competence, in line with art. 48¹ para. (7) and art. 400 of the Contravention Code.

7. On 12.09.2025, the CEC registered a complaint of the Alternative EB mentioning that Sergiu Lazarencu, a PAS candidate for the position of MP, misused administrative resources by using the position of minister in an event organized by ABS Recycling on 12 September 2025 on the occasion of inauguration of a new technological line. The CEC examined the complaint in five days, partially admitted it, and acknowledged the actual use of the position of minister in the cited event, but not the use of administrative resources.⁴² As a result, the CEC applied to the candidate Sergiu Lazarencu the sanction in the form of a warning.

The Promo-LEX OM considers that the CEC should not make difference between these two actions. The actual use of the position of minister in the context of the electoral campaign is a representative example of misuse of administrative resources, since there is a causal link between these two actions. The same logic is observed in the content of art. 16 para. (3) of the Electoral Code, which establishes that candidates in elections, who, by virtue of the office they hold, are obliged to comply with the legal regime of conflicts of interest, incompatibilities, as well as other restrictions and limitations provided by special legal norms, including for the purpose of preventing illicit use of administrative resources during the electoral period, shall suspend their activity in that position from the start of the electoral campaign.

³² Complaint [no. CEC-10Ap/31 of 11.09.25.](#)

³³ Complaint [no. CEC-10Ap/34 of 12.09.25.](#)

³⁴ CEC Decision [no. 3988 of 15.09.25.](#)

³⁵ [Report no. 1](#), Promo-LEX Observation Mission for the parliamentary elections of 28 September 2025, p. 14.

³⁶ Complaint [no. CEC-10Ap/32 of 12.09.25.](#)

³⁷ CEC Reply [no. CEC-8/8914 of 13.09.25.](#)

³⁸ Complaint [no. CEC-10Ap/33 of 12.09.25.](#)

³⁹ Reply [no. CEC-8/8909 of 13.09.25.](#)

⁴⁰ Complaint [no. CEC-10Ap/35 of 12.09.25.](#)

⁴¹ Reply [no. CEC-8/8910 of 13.09.25.](#)

⁴² CEC Decision [no. 3994 of 17.09.25.](#)

8. On 13 and 14.09.2025, the CEC registered four complaints filed by the Alternative EB⁴³ invoking violation by PAS of the rules for dissemination of electoral advertising in Chisinau mun.; Pogonesti v., Hincesti d.; Geamana v., Anenii Noi d.; and Federeuca v., Orhei d. The CEC examined the complaints in two days and sent them according to competence to the police inspectorates of Hincesti, Anenii Noi, and Orhei.⁴⁴ The CEC also informed the local public authorities that it is their competence to remove the unauthorized electoral displays.

9. On 13.09.2025, the CEC registered a complaint of the Alternative EB⁴⁵ invoking violation by PAS of the rules of distribution, supply, and dissemination of electoral advertising, namely the distribution of misleading materials and materials inciting hatred. The CEC examined the complaint in two days and sent it according to competence to the GPI,⁴⁶ in order to examine the deed provided by art. 52 para. (3) of the Contravention Code.

10. On 14.09.2025, the CEC registered a complaint of the Alternative EB⁴⁷ invoking that the Ambassador of Moldova to Romania Victor Chirilă, on 11.09.2025, during working hours, shared on his personal Facebook page the press conference of Dorin Recean and Igor Grosu, PAS candidates. The CEC examined the complaint in two days and sent it according to its competence to the GPI⁴⁸ for examination in the light of art. 364 and 400 of the Contravention Code.

11. On 16.09.2025, the CEC registered two complaints⁴⁹ filed by the Alternative EB against PAS and its candidate Sergiu Lazarencu for posts on the Facebook page "PAS Ciorescu" describing a meeting at Ciorescu town hall with representatives of the government, including Lazarencu, as Minister of Environment, Gheorghe Hajder, and PAS councillor Alexei Manoli. The complainant claimed that Lazarencu, unsuspected from office, participated in the electoral campaign as a representative of the government and a PAS candidate. The CEC examined the complaints in one day⁵⁰ and found that no administrative resources were used by Lazarencu, but identified favouring of their illegal use on the "PAS Ciorescu" page for his benefit, notifying the GPI. Despite finding repeated violation by the same person of the same rules (pt. 7 in this list), the CEC applied to PAS candidate Sergiu Lazarencu a warning and pointed out the need for PAS to comply with legal obligations and prevent such situations.

12. On 16.09.2025, PN filed a complaint⁵¹ against the violation by Olga Pînzaru, an official of PEB no. 14/4 Drochia appointed by PAS, of the regime of incompatibilities and restrictions in the part related to the non-admission of involvement in electoral activism. It reported that, on 07.09.2025, in the village of Pelinia, Drochia d., Olga Pînzaru participated in a PAS electoral meeting with local residents, and a picture on Facebook suggests that she was part of the PAS supporters group, being actively involved in the campaign. The CEC analysed the complaint in two days and rejected it,⁵² finding that Olga Pînzaru had been revoked from PEB by PAS, which led to the termination of her membership, making the complaint obsolete.

13. On 18.09.2025, the CEC registered a complaint of the Alternative EB,⁵³ which reported that electoral campaign materials containing direct calls of mayors to vote in favour of PAS were found in several localities in the country. The CEC examined the complaint in two days and sent it to the police inspectorates of Dubasari, Ialoveni, and Cahul for examination according to competence⁵⁴ in order to ascertain the deed provided by art. 48¹ para. (7) of the Contravention Code.

The Promo-LEX OM notes that many of the complaints regarding the misuse of administrative resources submitted to the CEC are subsequently sent to the GPI according to competence. It is unclear what criteria the CEC uses to decide whether a complaint should be examined by the electoral authority or sent to the GPI. In some cases, the same complaint is analysed by the CEC, which applies administrative

⁴³ Complaint [no. CEC-10Ap/37 of 13.09.25](#); Complaint [no. CEC-10Ap/40 of 14.09.25](#); Complaint [no. CEC-10Ap/41 of 14.09.2025](#); Complaint [no. CEC-10Ap/42 of 14.09.25](#).

⁴⁴ Reply [no. CEC-8/8941 of 15.09.25](#); Reply [no. CEC-8/8954 of 16.09.25](#); Reply [no. CEC-8/8955 of 16.09.25](#); Reply [no. CEC-8/8956 of 15.09.25](#).

⁴⁵ Complaint [no. CEC-10Ap/38 of 13.09.25](#).

⁴⁶ Reply [no. CEC-8/8929 of 15.09.25](#).

⁴⁷ Complaint [no. CEC-10Ap/39 of 14.09.25](#).

⁴⁸ Reply [no. CEC-8/8969 of 16.09.25](#).

⁴⁹ Complaint [no. CEC-10Ap/43 of 16.09.25](#); Complaint [no. CEC-10Ap/45 of 16.09.25](#);

⁵⁰ CEC Decision [no. 3995 of 17.09.25](#).

⁵¹ Complaint [no. CEC-10Ap/44 of 16.09.25](#).

⁵² CEC Decision [no. 4007 of 18.09.25](#).

⁵³ Complaint [no. CEC-10Ap/46 of 18.09.25](#).

⁵⁴ Reply [no. CEC-8/9026 of 20.09.25](#).

sanctions, and then it is sent to the GPI for examination in the light of the Contravention Code. The Guidelines⁵⁵ recently published by the CEC do not provide clarification in this regard. *We recommend the CEC to supplement the document with clear rules on the delimitation of competences between the CEC and the GPI.*

14. On 18.09.2025, the CEC registered a complaint of the Patriotic EB invoking violation by PAS of the rules of distribution, supply, and dissemination of electoral advertising, namely distribution of materials with inadmissible content. The content of the materials is identical to that described in pt. 9 of this list. The CEC examined the complaint in two days and sent it according to competence to the GPI,⁵⁶ in order to examine the deed provided by art. 364 of the Contravention Code.

15. On 18.09.2025, the CEC registered a complaint of PPDA⁵⁷ invoking misuse of administrative resources by PAS, namely the fact of using the image of President Maia Sandu in electoral campaign materials. The CEC examined the complaint in two days and sent it according to competence to the GPI,⁵⁸ in order to examine the deed provided by art. 48¹ para. (7) of the Contravention Code.

16. On 19.09.2025, PAS filed a complaint⁵⁹ alleging that the mayor of Drochia, Nina Cereteu, PN's candidate for the position of MP, misused administrative resources, namely, she made a post on Facebook, in which she appears against the background of repair and construction works on the roundabout in the city, thus directly associating the infrastructure project financed from the public budget with her own image and political activity. The CEC examined the complaint in two days and rejected it,⁶⁰ stating that it "did not take note of the launch or participation in the launch of infrastructure projects by Mrs. Nina Cereteu, the latter being present casually at the construction site with public access, no organizational elements with the involvement of administrative resources being present."

17. On 19.09.2025, the Alternative EB filed a complaint to the CEC,⁶¹ in which it noted that Igor Grosu, PAS candidate for the position of MP, published on his Facebook page several posts containing text and video as electoral campaign materials, which were the object of sponsored promotion as electoral advertising, in violation of the rules regarding the dissemination and distribution of electoral advertising. Having examined the complaint in two days, the CEC replied⁶² that "the video materials distributed on Mr. Igor Grosu's personal Facebook page do not constitute distinct or undeclared expenses. All amounts related to the materials promoted during the reference period were paid from the card account of the electoral competitor, PAS."

18. On 19.09.2025, the CEC registered four complaints filed by the Patriotic EB,⁶³ which invoked that the TikTok pages of the PAS candidates for the position of MP Igor Grosu, Doina Gherman, Dorin Recean, and Dan Perciun showed the titles President of the Parliament of the Republic of Moldova, Vice-President of the Parliament of the Republic of Moldova, Prime Minister of the Republic of Moldova, and Minister of Education and Research, respectively, but the content published on these pages refers to their activity as candidates for elective office. The CEC examined the complaints in three days,⁶⁴ declared them inadmissible, and noted that "the use of an official page benefiting from public institutional resources can be regarded as involving the resources and image of the respective institution, but the personal page has no institutional characteristics, does not represent the institution, and cannot be considered an administrative resource. It is reserved exclusively to the private sphere of the person, even if it highlights his official title, and its content cannot be assimilated under any circumstances with the use of public resources."

19. On 19.09.2025, the CEC registered a complaint filed by the Patriotic EB⁶⁵ invoking electoral activism in favour of PAS carried out by Ludmila Brînză, secretary of DEC no. 12 Criuleni. The complainant

⁵⁵ [Guidelines](#) on preventing and combating the use of administrative resources in electoral processes.

⁵⁶ Reply [no. CEC-8/9025 of 20.09.25.](#)

⁵⁷ Complaint [no. CEC-10Ap/49 of 18.09.25.](#)

⁵⁸ Reply [no. CEC-8/9025 of 20.09.25.](#)

⁵⁹ Complaint [no. CEC-10Ap/50 of 19.09.25.](#)

⁶⁰ CEC Decision [no. 4036 of 21.09.25.](#)

⁶¹ Complaint [no. CEC-10Ap/51 of 19.09.25.](#)

⁶² Reply [no. CEC-8/9045 of 21.09.25.](#)

⁶³ Complaint [no. CEC-10Ap/52 of 19.09.25;](#) Complaint [no. CEC-10Ap/53 of 19.09.25;](#) Complaint [no. CEC-10Ap/54 of 19.09.25;](#) Complaint [no. CEC-10Ap/59 of 19.09.25.](#)

⁶⁴ Reply [no. CEC-8/9056 of 22.09.25.](#)

⁶⁵ Complaint [no. CEC-10Ap/55 of 19.09.25.](#)

noted that she appeared in an electoral campaign material of PAS. The CEC examined the complaint in two days and sent it according to competence to DEC no. 12 Criuleni.⁶⁶

20. In the period of 19-20.09.2025, the Patriotic EB filed seven complaints,⁶⁷ showing that various electoral officials, on their personal Facebook pages, engage in electoral activism in favour of PAS. The CEC examined the complaints in two days and sent them according to competence to DEC no. 37 and DEC no. 38 to examine and take measures.⁶⁸

21. On 20.09.2025, the Patriotic EB filed five complaints⁶⁹ concerning the misuse of administrative resources and violation by several mayors nominated by PAS for local elections of the rules regarding the dissemination of electoral advertising. The complainant reported that these mayors engaged in electoral activism in favour of PAS on Facebook. At the time of writing this report, the CEC has not resolved these complaints.

22. On 22.09.2025, the Alternative EB filed a complaint⁷⁰ invoking that a billboard of PAS was found in the town of Cimislia, which said, "Attention. Do not vote for traitors," accompanied by photos of several politicians, including the leaders of the Alternative EB – I. Ceban, I. Chicu, M. Tkaciuk, and A. Stoianoglo. The complainant claimed that PAS was trying to induce the false image that the Alternative EB represented a pro-Russian force, respectively, trying to incite hatred and hostility towards the leaders of this bloc. At the time of writing this report, the CEC has not resolved this complaint.

23. On 22.09.2025, the Patriotic EB filed a complaint⁷¹ invoking that the Minister of Justice V. Mihailov-Moraru misused the administrative resources of the Ministry of Justice when she decided to publish a press release about filing a court action to limit the activity of PRIM, which, in the opinion of the complainant, led to the public discrediting of PRIM. At the time of writing this report, the CEC has not resolved this complaint. We consider that the publication of the press release by the Ministry of Justice does not constitute a violation of electoral rules, but an act of mandatory transparency, which does not exceed the limits of the ministry's powers.

3.3. Disputes in courts

During the observed period, the national courts examined a total of seven disputes. Their subject matter was prohibited electoral activism (two disputes), use of administrative resources (three disputes), suspension from office (one dispute), creation of a camouflaged electoral bloc (one dispute) – see Chart 3. The Alternative EB filed four actions, PAS – two, Irina Vlah – one action. The term of examination of electoral disputes varied between 2 and 5 days.

⁶⁶ Reply [no. CEC-8/9048 of 21.09.25.](#)

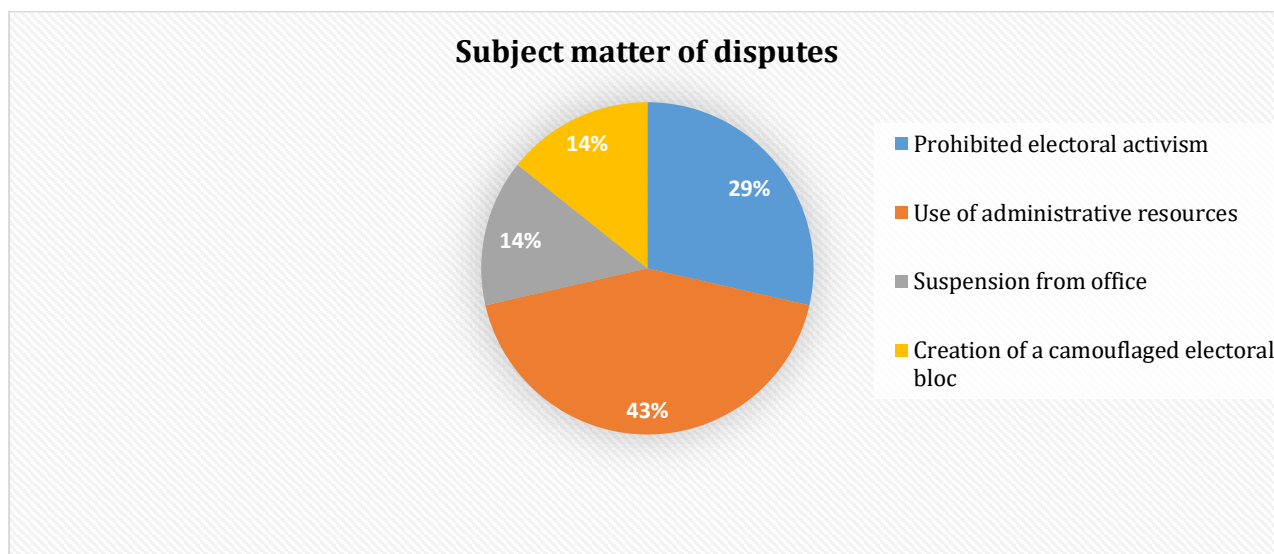
⁶⁷ Complaint [no. CEC-10Ap/56 of 19.09.25;](#) Complaint [no. CEC-10Ap/57 of 19.09.25;](#) Complaint [no. CEC-10Ap/58 of 19.09.25;](#) Complaint [no. CEC-10Ap/60 of 19.09.25;](#) Complaint [no. CEC-10Ap/61 of 20.09.25;](#) Complaint [no. CEC-10Ap/62 of 20.09.25;](#) Complaint [no. CEC-10Ap/63 of 20.09.25.](#)

⁶⁸ Reply [no. CEC-8/9051 of 21.09.25;](#) Reply [no. CEC-8/9052 of 21.09.25;](#) Reply [no. CEC-8/9049 of 21.09.25;](#) Reply [no. CEC-8/9053 of 22.09.25;](#) Reply [no. CEC-8/9054 of 22.09.25;](#) Reply [no. CEC-8/9081 of 22.09.25;](#) Reply [no. CEC-8/9050 of 21.09.25.](#)

⁶⁹ Complaint [no. CEC-10Ap/64 of 20.09.25;](#) Complaint [no. CEC-10Ap/65 of 20.09.25;](#) Complaint [no. CEC-10Ap/66 of 20.09.25;](#) Complaint [no. CEC-10Ap/67 of 20.09.25;](#) Complaint [no. CEC-10Ap/68 of 20.09.25.](#)

⁷⁰ Complaint [no. CEC-10Ap/69 of 22.09.25.](#)

⁷¹ Complaint [no. CEC-10Ap/70 of 22.09.25.](#)



Disputes initiated in courts are as follows:

1. On 12.09.2025, PAS filed an action to court against the CEC,⁷² challenging the reply of the electoral authority. It requested sanctioning PN, which allegedly committed violations in its electoral activities, namely, violated the restrictions on involvement of children in electoral activism. Having examined the action in three days, the court rejected it and held that “the plaintiff did not invoke violation of an infringed own right, because the complaint does not concern violation of the regulations on the financing of political parties, electoral campaigns, nominated candidates, initiative groups, and participants in the referendum, within the meaning of art. 91 para. (1) lit. d) of the Electoral Code.”

2. On 12.09.2025, Irina Vlah filed an action to court against the CEC,⁷³ in which she requested obliging the CEC to examine in substance a complaint that referred to the involvement of the prime minister and PAS candidate Dorin Recean in the use of administrative resources and his official position for electoral purposes. Having examined the action in four days, the court ordered the CEC to re-examine the complaint filed by Irina Vlah and held that “the defendant authority distorts the essence of the complaint, arguing certain subsidiary aspects such as exceeding the limits of the right to free expression, but avoids issuing an opinion regarding the fundamental reasoning of the complaint, as it failed to provide a coherent answer why the facts notified do not represent use of administrative resources or electoral activism.” Having examined the CEC’s appeal in three days, the SCJ upheld⁷⁴ the judgment of the court of first instance. Having re-examined the complaint, the CEC rejected it,⁷⁵ stating that “Mr. Dorin Recean’s public statements do not contain calls to vote and do not fit into the notion of negative electoral activism.”

Given the court’s finding that the CEC distorted the essence of the complaint by avoiding fundamental reasoning, we recommend the CEC to review and strengthen the internal procedures for examining electoral complaints by: (1) developing a clear procedure for reasoned replies, explicitly addressing all aspects of the complaint, according to art. 91 of the Electoral Code; (2) organizing training sessions for CEC members on international standards, such as the Venice Commission’s Code of Good Practice.⁷⁶

3. On 10.09.2025, the Alternative EB filed an action to court,⁷⁷ by which it requested obliging the CEC to examine in substance the complaint concerning the misuse of administrative resources by Dorin Recean, PAS candidate for the position of MP, manifested in the visit made to Japan on 01.09.2025, where he met with the president of the Japan International Cooperation Agency. Having examined the case in five days, the court rejected the action as unfounded, noting that “the office of prime minister, held by Dorin Recean, is not subject to the legal restrictions invoked, so its holder has no obligation to suspend his activity once the electoral campaign starts. Respectively, the trip to Tokyo of Dorin Recean, Action and

⁷² [CCA judgment](#) of 15.09.25 in PAS v. CEC.

⁷³ [CCA judgment](#) of 16.09.25 in Irina Vlah v. CEC.

⁷⁴ [SCJ Ruling](#) of 21.09.25 in Irina Vlah v. CEC.

⁷⁵ [CEC Decision](#) no. 4081 of 23.09.25.

⁷⁶ [Code](#) of Good Practice in Electoral Matters, adopted by the European Commission for Democracy through Law.

⁷⁷ [CCA judgment](#) of 15.09.25 in the Alternative EB v. CEC, third party Dorin Recean.

Solidarity Party's candidate for the position of member in the Parliament of the Republic of Moldova, cannot be interpreted as an electoral activity, as the official nature of the visit excludes any connection with the electoral campaign." The SCJ examined the appeal of the Alternative EB in four days and declared it inadmissible.⁷⁸ The decision of the court of first instance underlines the lack of clear restrictions for candidates who hold high-ranking public offices, such as the president of Moldova, the prime minister, and the president of the Parliament of Moldova, which may allow the indirect use of public offices in the campaign, a case also found in the presidential election of 2024.⁷⁹

Therefore, given the frequency of cases and their potential impact, we recommend that the Parliament revise the Electoral Code to clarify the limits of official campaign activities for these categories of persons.

4. On 10.09.2025, the Alternative EB filed an action to court against the CEC, in which it requested annulling the decision of the electoral authority, which found the violation by Ion Ceban of the obligation to suspend from office, applied him the sanction in the form of a warning, etc. Having examined the action in five days, the court rejected it as unfounded,⁸⁰ noting that "the public presentation, which occurred after the suspension from office and during the electoral campaign, can be and is regarded as a continuous promotion of Ion Ceban's image on the basis of the previously held position, which contradicts the spirit of the norms on equal opportunities and prevention of the use of administrative resources for electoral purposes. This practice contradicts the principle of equal opportunities and equal treatment in the electoral process." Having examined the Alternative EB's appeal in three days, the SCJ upheld the judgment of the court of first instance.⁸¹ The analysis of this case and the relevant recommendations were presented in the previous report of the Promo-LEX OM.⁸²

5. On 10.09.2025, the Alternative EB filed an action to court against the CEC, in which it requested obliging the CEC to re-examine the complaint that referred to the fact that a video was published on the Facebook page of the Embassy of the Republic of Moldova in Ireland, which contained a direct call to vote in favor of PAS. Having examined the action in five days, the court rejected it as unfounded,⁸³ noting that it "could not find in PAS' actions" any element of involvement in the management of the official website of the Embassy of Moldova in Ireland, nor any pressure on the embassy to promote the image of the party during the electoral period. Having examined the Alternative EB's appeal in three days, the SCJ declared it inadmissible.⁸⁴

Having analysed this case, we shall point out the lack of clear regulations in the Electoral Code and/or in the Law on diplomatic service⁸⁵ regarding the use of diplomatic resources in electoral campaigns. The absence of responsibility for such cases may encourage similar facts in the future. *We recommend the next Parliament to intervene in the legislation in order to remove this legislative vacuum, and the Ministry of Foreign Affairs to monitor and report the use of diplomatic resources in electoral campaigns.*

6. On 17.09.2025, the Alternative EB filed an action to court, in which it requested annulling the CEC decision and re-examining the complaint concerning the creation of a camouflaged electoral bloc by PAS and the Dignity and Truth Platform (PDA). Having examined the action in two days,⁸⁶ the court rejected it as unfounded, stating that "there are not enough indications regarding the existence of a camouflaged electoral bloc between PAS and PDA."

On 20.09.2025, PAS filed an action, in which it requested annulling the CEC decision by which, *inter alia*, the sanction of warning was applied to PAS candidate Sergiu Lazarencu, minister of environment, for favouring or consenting to the misuse of administrative resources in the case of posts made on the "PAS Ciorescu" Facebook page that described a meeting at Ciorescu town hall with representatives of the Government, including Sergiu Lazarencu, minister of environment, Gheorghe Hajder, and PAS councillor

⁷⁸ [SCJ Ruling](#) of 21.09.25 in the Alternative EB v. CEC, third party Dorin Recean.

⁷⁹ [Report](#) no.2, Promo-LEX Observation Mission for the presidential election and the republican constitutional referendum of 20 October 2024, p. 8-9.

⁸⁰ [CCA judgment](#) of 15.09.25 in the Alternative EB v. CEC, third party PAS.

⁸¹ [SCJ Ruling](#) of 20.09.25 in the Alternative EB v. CEC, third party PAS.

⁸² [Report](#) no. 3, Promo-LEX Observation Mission for the parliamentary elections of 28 September 2025, p. 8-9.

⁸³ [CCA judgment](#) of 15.09.25 in the Alternative EB v. CEC, third party PAS (case concerning the Facebook post made by the Embassy of the Republic of Moldova in Ireland).

⁸⁴ [SCJ Ruling](#) of 20.09.25 in the Alternative EB v. CEC, third party PAS (case concerning the Facebook post made by the Embassy of the Republic of Moldova in Ireland).

⁸⁵ [Law](#) on diplomatic service no. 761 of 27.12.2001.

⁸⁶ [CCA judgment](#) of 19.09.25 in the Alternative EB v. CEC, third party PAS (case concerning the creation of a camouflaged electoral bloc).

Alexei Manoli. Having examined the action in two days, the court partially admitted it⁸⁷ and annulled the sanction of warning, stating that “the posts made on the PAS Ciorescu Facebook page cannot be imputed to the plaintiff Sergiu Lazarencu. The administration of this page is not the responsibility of the candidate Sergiu Lazarencu, and in order to hold the candidate liable, it would be necessary to have pertinent evidence that he had ordered, requested, or expressly consented to the publication of the disputed text. Such evidence is missing in the case. At the same time, the automatic assignment of responsibility for the actions of third parties to the candidate contradicts the principle of personal responsibility.”

3.4. Activities of law enforcement bodies and central public authorities

1. On 11.09.2025, the Police and POCOCSA conducted 15 searches⁸⁸ in several localities of the country. The actions took place as part of a criminal case initiated on charges of electoral corruption, illegal financing of political parties, and money laundering.

2. On 12.09.2025, the National Anti-corruption Centre (NAC) and the Anti-corruption Prosecution Office (APO) carried out criminal investigation activities in Calarasi d.⁸⁹ in a criminal case concerning acts of corruption of voters.

3. On 15.09.2025, the NAC announced⁹⁰ that it was carrying out a number of procedural actions in a criminal case concerning alleged illegal activities related to the financing of political parties, money laundering, and corruption of voters. NAC officers, in collaboration with prosecutors from Balti mun., conducted 28 searches in the homes, offices, and cars of individuals and legal entities throughout the Republic of Moldova. As a result, 10 people were detained for 72 hours.

4. On 16.09.2025, the Police conducted searches⁹¹ in a criminal case concerning corruption of voters, illegal financing of political parties/initiative groups/electoral competitors in large proportions, and money laundering committed by an organized criminal group in particularly large proportions.

5. On 16.09.2025, the NAC and the Chisinau Prosecutor’s Office conducted searches in the capital city,⁹² as part of a criminal case on suspicion of illegal financing of political parties. As a result of the searches, money in various currencies equivalent to over MDL 20 million, electronic data storage devices, draft documents, as well as other relevant evidence were collected.

6. On 18.09.2025, the Police jointly with POCOCSA prosecutors conducted 46 searches in several localities of the country.⁹³ The actions were part of an investigation into voter corruption, illegal financing of political parties, and money laundering. One person was detained for 72 hours.

7. On 18.09.2025, the NAC, in collaboration with prosecutors from the Balti Prosecutor’s Office, carried out criminal investigation activities⁹⁴ in a case concerning money laundering, corruption of voters, and illegal financing of political parties. In the north of the country, more than 50 searches were carried out in the homes and offices of a political party, targeting 32 persons.

8. On 19.09.2025, the NAC, in collaboration with prosecutors from the Balti Prosecutor’s Office, conducted searches⁹⁵ in the capital, in a criminal case initiated on reasonable suspicions of illegal financing of political parties, money laundering, and electoral corruption.

9. On 22.09.2025, the GPI, POCOCSA, and SIS held a press briefing,⁹⁶ where they announced that criminal investigation activities were carried out in a criminal case concerning mass disorder in the context of the parliamentary elections. More than 250 searches were carried out and 74 persons were detained.

10. On 22.09.2025, the NAC conducted searches⁹⁷ in Chisinau, Orhei, and the south of the country in a criminal case on illegal financing of political parties, money laundering, and corruption of voters. As a result of these actions, one person was detained.

⁸⁷ [CCA judgment](#) of 22.09.25 in PAS v. CEC, third party Alternative EB.

⁸⁸ [Police press release](#) of 11.09.25.

⁸⁹ [NAC press release](#) of 12.09.25.

⁹⁰ [NAC press release](#) of 15.09.25.

⁹¹ [Police press release](#) of 16.09.25.

⁹² [NAC press release](#) of 16.09.25.

⁹³ [Police press release](#) of 18.09.25.

⁹⁴ [NAC press release](#) of 18.09.25.

⁹⁵ [NAC press release](#) of 19.09.25.

⁹⁶ [Press briefing](#) of 22.09.2025.

⁹⁷ [NAC press release](#) of 22.09.25.

11. On 23.09.2025, the NAC and prosecutors from Balti conducted over 30 searches⁹⁸ in the context of an investigation into facts of illegal financing of political parties, money laundering, and electoral corruption. The searches resulted in the seizure of over MDL 800 thousand. One person was detained for 72 hours.

12. On 24.09.2025, the Police conducted checks at a printing house in Chisinau⁹⁹ based on information received from the State Tax Service. They found and seized 200 ballot papers bearing the inscription "Sample" and the stamp mark "VOTED" next to the Alternative EB. According to the Police, the ballot papers were to be used on voting day in a "carousel" scheme. The representatives of the Alternative EB communicated that with this sample of ballot paper they intended to present to the voters the position of the Alternative EB in the ballot paper.

13. On 24.09.2025, the NAC and the APO conducted searches in several localities in the country.¹⁰⁰ They took place in the framework of a criminal case on acceptance of illegal financing of a political party by an organized criminal group.

14. On 24.09.2025, the chief of police communicated¹⁰¹ that thousands of Wi-Fi routers in people's homes were compromised on the morning of 24.09.2025 to block the CEC's servers and infrastructure on voting day. This phenomenon affected not only the CEC, but also the servers and websites of public institutions, as well as communication networks.

15. On 24.09.2025,¹⁰² the Police and SIS identified and neutralized a printing house involved in the production and dissemination of instigating materials. The newspapers were to be distributed in the north of the country, the process being managed by the clerical leader from the north of the country, affiliated to the Metropolis of Moldova and a supporter of a political party involved in the electoral race. One of the three detained persons admitted, during hearings, that he had been in the Russian Federation at the invitation of the NGO Eurasia.

16. On 25.09.2025, police officers from Balti took actions¹⁰³ in a criminal case concerning the involvement of a person in acts of corruption of voters in the context of the parliamentary elections. According to the Police, starting in May, a 47-year-old man from Balti, being an activist of the Șor criminal organization and supporter of a political party registered in the electoral race, allegedly recruited several voters from Balti municipality.

17. On 22.09.2025 and 24.09.2025, respectively, both the president¹⁰⁴ and the prime minister¹⁰⁵ came with messages before the parliamentary elections of 28 September, warning about the interference of the Russian Federation in the electoral process in Moldova and the risks of electoral corruption or destabilization attempts.

The Promo-LEX OM welcomes the firm and visible commitment of the law enforcement in combating electoral corruption. However, when serious violations such as those mentioned above are found, it is important that they end as promptly as possible, in the form of court judgments or CEC decisions, in order to ensure a real and timely protection of the integrity of the electoral process.

⁹⁸ [NAC press release](#) of 23.09.25.

⁹⁹ [Police post](#) of 24.09.2025

¹⁰⁰ [NAC press release](#) of 24.09.25.

¹⁰¹ [News](#) of 24.09.25. Wi-Fi in the homes of several citizens used to block CEC activity on voting day. Jurnal TV.

¹⁰² [Police press release](#) of 24.09.25.

¹⁰³ [Police press release](#) of 25.09.25.

¹⁰⁴ [Presidency press release](#) of 22.09.2025

¹⁰⁵ [Prime Minister press release](#) of 24.09.2025

IV. PERFORMANCE OF ELECTORAL COMPETITORS

4.1. Electoral activism activities

According to the law, the electoral campaign officially started for all registered competitors on 29 August 2025¹⁰⁶ (30 days before voting day), and shall end on the Friday before voting day. Electoral activism consists of appeals, statements, as well as information dissemination actions that aim to determine voters to cast their votes for a certain electoral competitor. The law does not establish that such actions, appeals, or statements must necessarily contain the call "Vote/Let's vote."

Promo-LEX notes that the electoral campaign for the 2025 parliamentary elections was more active compared to the previous national elections. The status of Moldova as a candidate country for EU accession, in conjunction with the involvement of the Russian Federation in the electoral process in Moldova, generated a tense socio-political climate during the elections of 28 September 2025. Competitors conducted activities both with physical presence and online. Meetings with voters and distribution of printed electoral materials are still preferred methods for competitors. During the electoral campaign, actions classified by Promo-LEX as unlawful include misuse of administrative resources, improper use of electoral advertising, corruption of voters, involvement of religious faiths in the campaign, black PR, and hate speech.

Statistically, during the reference period of this report, Promo-LEX observers found at least 1,984 electoral campaign activities (see Table 2), about 50% more than in the first part of the electoral campaign. Through these activities, competitors promoted their own electoral message, but also criticized opponents or public authorities. Of the total observed activities, most (68%) related to the distribution of information materials (newspapers, leaflets, flyers, calendars, etc.), and 22% were meetings with voters. In terms of subjects, the most activities were observed from PAS and the Patriotic EB – about 26% each.

Table 2. Campaign activities observed during the monitored period

	<i>Dissemination of information materials</i>	<i>Meetings with voters</i>	<i>Trips to the territory / abroad</i>	<i>Protests / flash mobs</i>	<i>Press conferences / debates</i>	<i>Door-to-door activities</i>	<i>Total</i>
<i>Events conducted by electoral competitors</i>							
Alternative EB	237	24	23	0	5	14	303
Together EB	7	1	2	0	0	0	10
Patriotic EB	345	111	18	2	1	25	502
ALDE	0	0	0	0	2	0	2
AUR	14	0	0	0	0	0	14
BUN	0	1	0	0	0	0	1
CUB	21	7	1	0	0	2	31
LOC	40	2	1	0	1	2	46
MRM	129	18	1	0	1	7	156
PAM	37	1	0	0	0	0	38
PAS	256	216	28	0	2	13	515
PL	0	1	19	0	0	0	20
PN	179	13	2	0	0	9	203
PNM	12	2	1	0	0	2	17
PPDA	7	6	2	0	0	0	15
PPMM	1	19	3	0	0	0	23
PSDE	38	19	1	0	0	0	58
IC	22 ¹⁰⁷	3 ¹⁰⁸	1 ¹⁰⁹	0	0	0	26
Victory PB¹¹⁰	0	1	0	3	0	0	4
Total	1,345	445	103	5	12	74	1,984

¹⁰⁶ [Calendar of activities](#) for organizing and conducting the parliamentary elections of 28 September 2025.

¹⁰⁷ Andrei Năstase – 16; Olesea Stamate - 5; Victoria Sanduța – 1.

¹⁰⁸ Andrei Năstase – 1; Olesea Stamate – 2.

¹⁰⁹ Olesea Stamate – 1.

¹¹⁰ By Victory PB in this report we mean the parties that expressed the intention to form an electoral bloc but were not registered by the CEC. We have kept in this section the mentions to show that they, contrary to legal regulations, carry out activities with electoral impact, even if they are not registered.

Compared to the end of the electoral campaign for the early parliamentary elections of 2021, when 1,456 events were reported by observers,¹¹¹ in the parliamentary elections of 2025, for the similar campaign period, we find a much higher activism.

4.2. Electoral advertising

For the current observation period, the Promo-LEX OM identified 1,754 situations in which electoral advertising was used to promote candidates for the position of MP (see Table 3). The massive use of electoral visibility materials (vests, bags, caps, etc.) by activists is a distinctive feature of these elections. Among electoral advertising tools, the most used have been street advertising (tents, billboards, etc.), but also printed materials.

Table 3. Cases of use of electoral advertising

	<i>Vests, bags, caps, etc.</i>	<i>Newspapers, leaflets, flyers, etc.</i>	<i>Billboards, tents</i>	<i>Online advertising</i>	<i>Advertising in print media</i>	<i>Total</i>
Alternative EB	147	25	10	17	0	199
Together EB	3	1	2	4	0	10
Patriotic EB	344	16	25	13	0	398
ALDE	0	0	0	2	0	2
AUR	6	12	4	0	0	22
BUN	0	1	0	1	0	2
CUB	22	4	8	2	0	36
LOC	15	2	9	10	0	36
MRM	124	12	13	5	0	154
PAM	24	0	8	10	0	42
PAS	239	85	106	40	1	471
PL	0	0	0	2	0	2
PN	183	1	40	4	0	228
PNM	14	1	0	4	0	19
PPDA	13	4	5	0	0	22
PPMM	19	0	0	0	0	19
PSDE	37	9	7	12	0	65
IC	4 ¹¹²	15 ¹¹³	2 ¹¹⁴	6 ¹¹⁵	0	27
Total	1,194	188	239	132	1	1,754

The use of advertising was most often reported in the case of PAS – 27%, followed by the Patriotic EB – 24%, and PN – 23%.

Non-compliant use of electoral advertising. The rules for the use and distribution of electoral advertising are set out in the CEC Regulation on the ways of providing, distributing, and disseminating political, electoral advertising and messages of public interest¹¹⁶.

Placement of electoral advertising in prohibited places. At least 37 cases were observed, of which about 50% concerned PAS. Most of the violations are related to the placement of banners on fences and buildings adjacent to the road.

Table 4. Placement of electoral advertising in prohibited places

Competitor	No.	Case description
Alternative EB	2	- Posters placed at the local bus stops (Jora de Mijloc v., Orhei d.) - Banner placed on an agricultural plot (Geamana v., Anenii Noi d.)
Patriotic EB	1	- Posters placed at the local bus stops (Caslita-Prut v., Cahul d.)
Andrei Năstase, IC	1	- Poster placed on the information board at the town hall (Banesti, Telenesti d.)
LOC	1	- Banner placed on a fence (Rezina, Rezina d.)
MRM	1	- Poster placed on the information board at the town hall (Peciste, Rezina d.)

¹¹¹ [Report no. 5](#). Promo-LEX OM for the early parliamentary election of 11 July 2021, p. 29.

¹¹² Andrei Năstase.

¹¹³ Andrei Năstase.

¹¹⁴ Andrei Năstase.

¹¹⁵ Andrei Năstase – 3; Olesea Stamate – 3.

¹¹⁶ [CEC Regulation](#) on the ways of providing, distributing, and disseminating political, electoral advertising and messages of public interest, approved by CEC Decision no. 1155 of 4 August 2023.

PAS	19	<ul style="list-style-type: none"> - Banner placed at the local bus stop (Ocnita, Ocnita d.) - On the fence of a company (Chisinau, Ciocana sector) - Banners placed on fences (Orhei, Susleni) - Banner on the fence of a dwelling (Bahrinesti, Floresti d.) - Banner placed on the fence of a dwelling (Drepcauti, Briceni d.) - Banner placed on a fence (Andrusul de Jos, Cahul d.) - Banner placed on a fence (Ciutulesti, Floresti d.) - Electoral poster placed on the information board of the PEB (Bogzesti, Telenesti d.) - Banner placed on the fence of a dwelling (Ciobalaccia, Cantemir d.) - Banner placed on a fence (Ignatei, Rezina d.) - Banner placed on a fence (Saptebani, Riscani d.) - Banner placed on a fence (Durlesti, Chisinau mun.) - Banner placed on a fence (Rezina, Rezina d.) - Banner placed on a fence (Bolduresti, Nisporeni d.) - Banner placed on a fence (Ciripcau, Floresti d.) - Banner placed on a fence (Cosernita, Floresti d.) - Banner placed on a fence (Sircova, Rezina d.) - Banner placed on a fence (Podgoreni, Orhei d.) - Banner placed on a fence (Nimoreni, Ialoveni d.)
PN	10	<ul style="list-style-type: none"> - Banner on the window of an uninhabited house (Pirlita, Ungheni d.) - Banner on the walls of uninhabited buildings adjacent to the road (Prajila, Floresti d.) - Banner on a fence (Soldanesti, Soldanesti d.) - Banner on the wall of the house adjacent to the road (Basarabeasca, Basarabeasca d.) - Banner on the wall of a house adjacent to the road (Stoianovca, Cantemir d.) - Banner on the wall of a house adjacent to the road (Donduseni, Donduseni d.) - Banner placed on a gate (Braniste, Riscani d.) - Banners placed on fences (Floresti, Floresti d.) - Banners on the walls of uninhabited buildings adjacent to the road (Nisporeni, Nisporeni d.) - Banner placed on a fence (Holercani, Dubasari d.)
PPDA	1	- Banners placed on fences (Stefan Voda, Stefan Voda d.)
PSDE	1	- Poster placed on the information board of the town hall (Cornesti, Ungheni d.)

Lack of full print data:

- PNM – two cases, the printing house is not indicated in the data of the printed material.
- AUR – one case, banners at the tent without print runt.
- BUN – one case, posters without printing data.

Use of political advertising materials as electoral activism materials. The Promo-LEX OM identified at least 9 cases of use by competitors of activism materials printed before the electoral campaign, bearing the note “Political advertising” or no notes regarding the type of advertising. The competitors concerned are: IC Andrei Năstase (1 case); PAS (2 cases); PN (3 cases); PSDE (3 cases).

Table 5. Use of political advertising in the electoral campaign

No.	Competitor	No.	Cases / locality	Comments
1.	Andrei Năstase, IC	1	Ciocana, Chisinau	At the campaign tent of candidate Andrei Năstase, volunteers were wearing vests saying “Andrei Năstase President” (from the 2024 elections)
2.	PAS	2	Criuleni, Dubasarii Vechi Criuleni, Corjova	Distribution of calendars with political advertising Banner with political advertising
3.	PN	3	Sculeni, Ungheni Ungheni, Ungheni Cantemir, Cantemir	Banners at tents with electoral advertising from the 2024 presidential election Banners at tents with electoral advertising from the 2024 presidential election Roll-up banners with political advertising
4.	PSDE	3	Costesti, Ialoveni Ungheni, Ungheni Rezina, Rezina	Distribution of political advertising newspapers Distribution of flyers with political advertising Distribution of political advertising newspapers

4.3. Use of administrative resources

According to the law,¹¹⁷ 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.¹¹⁸

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,¹¹⁹ 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.¹²⁰

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 29.06.1990¹²¹, 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 monitored period, at least 84 cases were appreciated by Promo-LEX as misuse of administrative resources, of which 66 cases concerned PAS, 8 cases – the Patriotic EB, 5 cases – the Alternative EB, 3 cases – CUB, 1 case – LOC and PNM each. (For the description of cases, see Annex no. 1)

The Promo-LEX OM observed the following types of administrative resources:

- *Taking credit for public goods, works/services paid with public money* – at least 7 cases, by PAS (6) and the Alternative EB (1). These are situations when candidates, but also supporters who hold certain offices, talk about infrastructure or other projects made on public money, but credit is given exclusively to an electoral competitor.
- *Use of state institutions for the purpose of electoral promotion* – at least 9 cases, by PAS. Most of the identified cases refer to the use of the premises of town halls for activities of electoral promotion of a particular competitor.
- *Involvement of public officials / mayors in the campaign during working hours* – 30 cases, by PAS (23), the Patriotic EB (3), CUB (3), and LOC (1). Most cases refer to the involvement/participation of mayors in electoral meetings of competitors, during the official’s working hours.
- *Holding electoral meetings with public sector employees during their working hours* – 38 cases. Of these, 28 cases by PAS, 5 – the Patriotic EB, 4 – the Alternative EB, 1 – PNM. Most cases involved schools, kindergartens, and medical institutions, where competitors held electoral meetings.

4.4. Involvement of religious faiths in the campaign

Electoral activism carried out by representatives of religious faiths, including in places of worship, during the electoral campaign is sanctioned.¹²² Also, the law¹²³ prohibits financing or material support in any form of electoral competitors by religious faiths. It is forbidden to use images representing religious faiths

¹¹⁷ Art. 54 para. (6) lit. e) and art. 70 para. 6 of the Electoral Code.

¹¹⁸ 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.

¹¹⁹ [Report](#) of the Venice Commission on the misuse of administrative resources during electoral processes, Strasbourg, 16 December 2013.

¹²⁰ “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.”

¹²¹ [Document](#) of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE (OSCE) of 29.06.1990, pt. 5.4.

¹²² Art. 52 para. (2) of the [Contravention Code](#).

¹²³ Art. 54 para. (5) of the [Electoral Code](#).

or component parts in electoral programs, electoral campaigning materials, electoral activism actions, and electoral advertising that refer, in one way or another, to electoral competitors.¹²⁴

Contrary to the above, Promo-LEX observers reported at least 6 cases of involvement of religious faiths in the campaign, as follows:

- On 18 September 2025, the Telegram channel “Viața Eparhiei de Edineț și Briceni” [Life of the Eparchy of Edinet and Briceni] distributed a short video and a message to parishioners about “the right choice on 28 September 2025.” The post was shared from the channel “Sare și lumină” [Salt and light]. Through this post, citizens are asked to choose based on the dilemma: “Giving up faith, language, and roots in exchange for foreign rules and ‘European values’.” Such messages were also distributed by other channels, which present themselves as belonging of the Metropolis of Moldova, such as, for example, “Viața Eparhiei de Soroca și Drochia” [Life of the Eparchy of Soroca and Drochia]. At the same time, the Orthodox Church of Moldova, through an official post, dissociated itself from the respective channels on Telegram and on other networks, noting that it warns about the appearance of inauthentic accounts and pages in the online space and disavows them.¹²⁵ However, journalistic investigations have shown that beyond this official position of the Moldovan Metropolis, local clerics seem to be involved in electoral and political campaign activities.¹²⁶
- On 14 September 2025, the Patriotic EB’s candidate Olga Cebotari posted a picture from the church service in Como, Italy, on her Facebook page. The post included the message, “Today, I attended the Sunday service at the Moldovan church in Como, along with many fellow citizens settled in this region,” and it is a place where fellow citizens “communicate and keep in touch with our roots and traditions.”
- On 15 September 2025, PAS candidates Raisa Cuceș and Gheorghe Ichim made a visit for electoral purposes to the Baptist church in Singerei Noi village, Singerei district.
- On 21 September 2025, candidate Olesea Stamate met with Moldovan citizens in Mestre, Italy, during the patron saint holiday of the local Orthodox church.
- On 21 September 2025, PPDA candidate Vasile Costiuc and his team of activists visited the church in Slobozia Mare village, Cahul district. The candidate posted a video with the image representing a religious faith.
- On 22 September 2025, MRM candidate Eugeniu Nichiforciuc posted a campaign video made at the Martha and Mary Monastery in Hagimus village, Causeni district. The candidate used images representing religious faiths.

4.5. Acts of intimidation, possible provocation in electoral context, and black PR

The Promo-LEX OM identified at least three situations that can be qualified as acts of intimidation or potentially jeopardizing the electoral process and three situations of black PR, as follows:

- According to a Promo-LEX observer, the town hall of Ceadir Lunga, on 12 September 2025, tried to dismantle a billboard belonging to the campaign of Watchdog.md community, “Putin’s parrots.” However, this action was prevented by representatives of law enforcement. After that, a police car is constantly stationed in the area where the advertising construction is located.
- On 20 September 2025, a video appeared on social networks with PAS candidate Ludmila Adamciuc in the car of Edinet Police Inspectorate. The person who posted the video came with a message that the candidate allegedly called people “retards”, suggesting that for this reason she got detained by the police crew. According to a Promo-LEX observer, PAS candidate Ludmila Adamciuc, who was nearby for electoral activism purposes, tried to cross the street at the pedestrian crossing, but a car did not give priority to her, and there was a risk of accident. The car was driven by a former PAS activist and ex-member of the PAS TO in Edinet (excluded from the party in 2023), who had an aggressive reaction towards Ludmila Adamciuc, accusing her of provoking the situation that could have led to an accident. As a result of the verbal assault messages, police intervention was requested to identify and hear the people involved. The incident was filmed by an activist of a political party, who was nearby, distributing printed materials in a tent.

¹²⁴ Art. 70 para. (4) of the [Electoral Code](#).

¹²⁵ [Warning](#) by the Orthodox Church of Moldova.

¹²⁶ [Investigation](#). In the name of the Lord and the “holy Telegram”, consultants from Moscow are making a selective “way of the cross” to churches in Soroca and Drochia.

- On 24 September, public groups on social networks dedicated to the localities of Dubasari district distributed messages that were allegedly made on behalf of PAS. In them, voters were invited to come after the elections (between 29 September and 3 October) to “the nearest branch” of the party with “a photo of the ballot paper” in order to “receive financial remuneration.” PAS published a denial of such messages back on 18 September.¹²⁷
- During the monitored period, PAS volunteers were seen distributing electoral materials (flyers printed in 700,000 copies) promoting 7 forecasts about what will happen if their opponents win the elections, including: “free movement between European states will stop, borders to the free world will be closed”; “Moldovans from abroad will no longer have the right to vote.” These printed materials depicted the images of some opponents to the position of MP and some politicians.
- The Patriotic EB’s volunteers were also seen distributing electoral materials (flyers printed in 1 million copies), which said, “5 years under PAS – 5 steps back for Moldova,” and listed some hypotheses, including: “villages become deserted, the country is dying”; “contempt for national identity”; “pressure on the Orthodox Church”.
- The installation of billboards with disparaging messages was observed, by the Patriotic EB with the text “Down with the yellow dictatorship”, and by PAS with the text “Attention! Do not vote for traitors”, with pictures of some opponents to the position of MP.

4.6. Involvement of third parties in the electoral process

The Promo-LEX OM continued to observe the involvement of “third parties” – individuals and legal entities that apparently have no legal links with electoral competitors – in electoral activism activities for/against competitors, or on specific topics associated with the electoral campaign.

Instead of making direct donations to competitors, these “third parties” promote information with electoral impact. Respectively, their monitoring is important and necessary, including because the financial expenses incurred by “third parties” are not regulated and, therefore, not reported or controlled.¹²⁸

During the monitoring period, activities with electoral impact carried out by at least 15 entities that can be qualified as “third parties” were observed, as follows:

- *“The Kremlin’s digital army” coordinated by the Russian Federation to promote Victoria Furtună and the Greater Moldova Party*

Investigative journalists from the publication Ziarul de Gardă¹²⁹ continued to follow online activities of creating and distributing anti-PAS / anti-governmental content and narratives by a network of over 200 “infoleaders” (activists from Moldova), trained, coordinated, and paid from the Russian Federation. According to the investigation, the network’s purpose in the second part of the electoral campaign changed from promoting the components of the Victory bloc to promoting Victoria Furtună and PPMM.

- *Project “For Fair Elections”*

According to the journalistic investigation conducted by NordNews,¹³⁰ this project was managed by a group of people trained by trainers from the Russian Federation and coordinated by Alina Juc. They were specialized in conducting so-called “surveys” among people in Chisinau, Balti, and Comrat. For this purpose, they recruited and trained “volunteers” they paid with money from the Russian Federation, from the NGO Eurasia, coordinated by Ilan Șor. The group’s activities and surveys promoted opposition parties with pro-Russian messages, especially the PPMM. Some of the persons targeted by the investigation, including Alina Juc, were detained by the authorities.

- *Website and Facebook page <https://moldovenii.md/md>*

¹²⁷ [Post](#) by PAS of 18.09.2025

¹²⁸ For details, see [Promo-LEX policy paper](#): Political and electoral financing by “third parties”

¹²⁹ [The Kremlin’s digital army \(II\)](#). Salaries in crypto, the party friend, and the declared enemy. Undercover ZdG investigation.

¹³⁰ [Investigation](#). Five months undercover. Moscow network, conspiratorial actions, money, propaganda, and electoral manipulation.

In the second half of the campaign, the intensity of posts about PAM by the respective information resources increased.¹³¹ Other competitors are not mentioned/promoted on this website.

- *Facebook page “Stop the Theft and War Group” [Opriți gruparea Hoție și Război]*

This Facebook page, which was active during the entire electoral period, stepped up the pace of sponsored posts closer to voting day. They continued to criticize the Patriotic EB and the Alternative EB, promoting the option of European integration and criticizing the pro-Russian one. No particular competitor is promoted. According to Meta reports, between 8 and 21 September, 41 sponsored ads worth about MDL 94,890 were disseminated.

- *“Alarmativa” Facebook page*

The page was created in June 2025, but it promotes messages during the electoral period against the Alternative EB and warns about the influence tactics of the Russian Federation. According to Meta reports, between 8 and 21 September, 3 sponsored ads worth about MDL 50,390 were disseminated.

- *Facebook page “Vocea Moldovenilor” [Voice of Moldovans]*

During the electoral period of the parliamentary elections 2025, the page promotes messages supporting the European integration of Moldova and criticizing the Pro-East or pro-Russian options. In the period of 8 to 21 September, according to Meta reports, over MDL 36,875 were spent to promote 80 ads. No particular competitor is promoted.

- *Facebook page “De pe internet” [From the internet]*

It is a page created in 2024, which reactivated starting 8 September 2025 after a period of pause. The posts contained videos promoting the pro-EU option and criticizing the pro-Russian geopolitical orientation. Between 8 and 21 September, according to Meta reports, it promoted 33 sponsored posts amounting to over MDL 24,910.

- *Facebook page “Inter Moldova”*

The page was created in 2018, the last time it was renamed in July 2025, and on 8 September it began to actively promote video content against Vasile Costiuc (PPDA) and Irina Vlah (Patriotic EB). It also promoted European integration and criticized the pro-Russian position. Between 8 and 21 September, according to Meta reports, it promoted 10 sponsored posts amounting to over MDL 17,319.

- *Facebook page Молдова Молдовенеск Молдовенеште [Moldova Moldovan Moldovan]*

Starting with 8 September 2025, this page also got active after being more passive in the previous reporting period. It is a page with posts containing critical messages about Irina Vlah and Igor Dodon (Patriotic EB). It also posted calls for a “boycott” of the election. In the period of 8 to 21 September, according to data from Meta’s ad library, it promoted 8 sponsored posts amounting to about MDL 16,731.

- *Facebook page “Ruskii Korabili”*

The page is in Russian and it was created in September 2024. Its posts criticize the Russian Federation and promote the path of European integration. In the context of the parliamentary elections, during the monitored period, videos were posted criticizing “Russian Federation plans regarding Moldova” and promoting Maia Sandu and the idea of European integration. In the period of 8 to 21 September, according to data from Meta’s ad library, it promoted 8 sponsored posts amounting to about MDL 10,081.

- *Facebook page “Valorile Familiei Moldovenești” [Moldovan family values]*

The page was created on 13 December 2024, but its name was changed to its current name on 23 August 2025. The page presents itself as belonging to an advertising agency, aiming to protect the traditions, family, and children of Moldova. It distributes, through sponsored posts, messages against PAS. In the period of 8 to 21 September, according to data from Meta’s ad library, it promoted 7 sponsored posts amounting to about MDL 6,650. Because these ads ran without a mandatory disclaimer, their content was restricted.

- *Telegram channel, YouTube channel, and newspaper distribution “Sare și lumină” [Salt and light]*

¹³¹ [News](#). Moldovan reality.

The Telegram channel with about 4,600 subscribers promotes pro-Russian and anti-EU messages through the prism of religious rhetoric and “care” for keeping traditions. In this context, on 18 September 2025, in Grigorauca v., Singerei d., Russian-language newspapers without printing data, belonging to the Salt and Light community, were observed. They contain anti-government and anti-European messages. According to investigative journalists, the media channels Salt and Light are initiated and financed by the services of the Russian Federation and are connected with the priests of the Metropolis of Moldova.¹³²

- *YouTube channel Ковчег - семья и вера [Shrine - Family and Faith]*

The channel created in the run-up to the parliamentary elections (including Telegram, Instagram, and TikTok) is Russian-speaking and positions itself as an “Orthodox Christian youth movement.” Beyond the religious facade of the channel, its videos intensely promote political and electoral topics.¹³³ The position expressed is pro-Russian and anti-government. Members of the Revival Party are promoted.

- *Facebook and Instagram page “Moldova: AICI ȘI ACUM” [Moldova: HERE AND NOW]*

During the observation period, it promoted sponsored posts with videos and messages of criticism against the “yellow” PAS that allegedly “undermine democracy and deprive thousands of Gagauz people of voting.” There are also messages of support for Evghenia Guțul.

- *Facebook page “Mișcarea civică Inițiativa Europeană” [Civic Movement European Initiative]*

Promo-LEX observers found in the current reporting period, too, the activism of this civic platform, manifested through sponsored posts on social networks and distribution of informative materials in localities (newspapers with the message “Moldova decides”). The topics of the posts referred to dismantling “falsehoods about the EU” and the promotion of European values. No particular competitor is promoted. In the period of 8 to 21 September, according to data from Meta’s ad library, it promoted 15 sponsored posts amounting to about MDL 9,390.

In the opinion of Promo-LEX, the involvement of third parties in electoral processes is an issue that requires a complex approach by authorities, political actors, and experts. Although not all cases represent direct support for or promotion of a particular electoral competitor, the Promo-LEX OM, through the examples presented, seeks to draw attention to this important issue, the solution of which could contribute to ensuring equal opportunities for the competitors involved in the campaign.

4.6.1. Coordinated inauthentic behaviour

In addition to the activity of third parties who identify themselves through a page on social networks, website, campaigns of public associations, the Promo-LEX OM finds that there are also third parties that act through several pages on social networks, including with unidentifiable persons or fake profiles. They aim to manipulate public perceptions and influence opinions, decisions, or behaviours by artificially amplifying certain messages, including disinformation, and creating the impression of a broad consensus.

The coordinated inauthentic behaviour observed in the context of the parliamentary elections was manifested in the amplification of the following narratives on social networks:

- “Electoral corruption is a tool to threaten voters” – this message was promoted from 2 to 16 September.
- “Repair of 7 bridges over the Dniester before the elections – a strategy for limiting the right to vote” – this message was promoted from 18 to 24 September.
- “Closure of the 12 polling stations for voters from the left bank of the Dniester under the pretext of Russian influence” – this message was promoted from 19 to 23 September through 38 sponsored posts,¹³⁴ paid for by 27 accounts, in the META network. In order to promote the same message, a clone of the CEC website was created, which communicated about the alleged stopping

¹³² [Investigation](#). In the name of the Lord and the “holy Telegram”, consultants from Moscow are making a selective “way of the cross” to churches in Soroca and Drochia.

¹³³ Bishop arrested. A threat to spiritual independence. [Orthodox news from Moldova](#).

¹³⁴ [Meta ad library](#)

of the activity of polling stations organized for voters from the left bank of the Dniester. The CEC denied this false information on 20 September.¹³⁵

- “The ballot papers provided for postal voting do not contain all the electoral competitors” – this message was promoted on 23-24 September. The CEC denounced this fake on 23 September.¹³⁶
- “Election fraud is being prepared” / “Annulment of elections is being prepared” / “There are no free elections in Moldova” – these messages were promoted during the entire electoral period, but intensified from 18 to 24 September.

The promotion of these narratives represents attacks on the electoral process, in order to discredit it and the institutions that organize and conduct elections.

At the same time, the Promo-LEX OM found coordinated inauthentic behaviour that could influence the voting option through:

- The hashtag *#alegmoldova* on TikTok, which, according to Promo-LEX, was used to promote about 2,700 videos between 15 and 18 September,¹³⁷ accumulating 1.4 million views. Thus, a network of at least 550 accounts on TikTok was identified, created with the help of artificial intelligence, which uploaded the same types of videos. The Promo-LEX OM informed the GPI and the CEC about this network. In this context, we shall mention that TikTok announced that it deleted over 100,000 fake accounts in just two months (August and September), having destroyed four networks of hidden influence that targeted the Moldovan public with political messages.¹³⁸
- Creation of Telegram channels of the dioceses of the Metropolis of Moldova,¹³⁹ with the distribution of the same messages regarding the alleged harassment and pressure exerted on the Orthodox Church of Moldova, as well as urges to vote “for Church, Family, Future” on 28 September. The same messages are distributed on other Telegram channels of a religious nature.¹⁴⁰ We shall remind that the Metropolis of Chisinau and All Moldova warned on 22 September¹⁴¹ about the appearance of inauthentic accounts and pages online and disavowed the content published on these platforms.
- Creation of Telegram channels of the country’s districts/municipalities with allegedly informational content (news), distributing the same content promoted by the Victory PB / Ilan Șor’s team, including criticism of the government in the context of the parliamentary elections and promotion of PPM. The Promo-LEX OM identified at least 21 such channels.¹⁴²

Given the diversity of methods of influencing and manipulating opinion through coordinated activity, the funding and authors of which are not identifiable, we believe that the authorities should examine the issue of third parties, both in terms of future legal regulation and in terms of influence on voting results.

¹³⁵ [Refutation](#) by the CEC of false information about the closure of polling stations for voters from the left bank of the Dniester.

¹³⁶ [Refutation](#) by the CEC of a new fake that appeared online on 23.09.2025

¹³⁷ [Promo-LEX article](#) of 19.09.2025 – massive online networks that manipulate the vote.

¹³⁸ [Newsmaker article](#) of 17.09.2025

¹³⁹ Viața Eparhiei de Bălți și Fălești (279 subscribers); Viața Eparhiei de Cahul și Comrat (251 subscribers); Viața Eparhiei de Soroca și Drochia (245 subscribers); Viața Eparhiei de Ungheni și Nisporeni (326 subscribers); Viața Eparhiei de Chișinău (666 subscribers); Viața Eparhiei de Edineț și Briceni (168 subscribers).

¹⁴⁰ ТРАДИЦІЯ.МД (334 subscribers); Православная Молдова и мир (562 subscribers).

¹⁴¹ [Press release](#) of the department for institutional communication and relations with the media of 22 September

¹⁴² Сороки. Молдова (403 subscribers); Теленешты 24 🌟(461 subscribers); Hîncești NewsMD (707 subscribers); Briceni/Бричань (964 subscribers); Anenii Noi мд Новые Анены (639 subscribers); Дубоссары Онлайн (1,001 subscribers); Căușeni.News (511 subscribers); Дрокия мд Drochia (607 subscribers); Флорешты | Молдова мд 🌟 Floreștiului (623 subscribers); Главное в Рыбнице (740 subscribers); Кишинев мд Chișinău | Arcul Informației (2,253 subscribers); Criuleni - Știri locale|Криуляны (661 subscribers); UnGheni | Унгены мд (916 subscribers); Карул Сегодня (1,757 subscribers); Glodeni 🌟 Глодяны (524 subscribers); Сынжерейская хроника (616 subscribers); REZINA 24 (485 subscribers); Călărași News (513 subscribers); Fălești Știri & Evenimente (481 subscribers); Мир Гагаузии. Новости Молдовы. (471 subscribers); Бельцы 24/7 (1,380 subscribers).

V. FINANCING OF THE ELECTORAL CAMPAIGN

5.1. Financial reporting to the CEC

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, 21 of the 23 electoral competitors registered the person responsible for finances.

Table 6. Information on compliance with requirements of financial reporting to the CEC

No.	Competitor	Registration	Treasurer	Report at the start of campaign	Opening of Electoral Fund	Deadline for presentation 01. 09. 25	Deadline for presentation 08. 09. 25	Deadline for presentation 15. 09. 25	Deadline for presentation 22.09.25
1	PAS	27.07.25	27.07.25	31.07.25	04.08.25	Submitted	Submitted	Submitted	Submitted
2	PPDA	30.07.25	30.07.25	29.08.25	28.08.25	Submitted	Submitted	Submitted	Submitted
3	CUB	06.08.25	06.08.25		13.08.25	Submitted	Submitted	Submitted	Submitted
4	Andrei Năstase IC	06.08.25	06.08.25		09.08.25	Submitted	Submitted	Submitted	Submitted
5	ALDE	10.08.25	10.08.25		20.08.25	Submitted	Submitted	Submitted	Submitted
6	Olesea Stamate IC	13.08.25	13.08.25		22.08.25	Submitted	Submitted	Submitted	Submitted
7	PNM	15.08.25	15.08.25		19.08.25	Submitted	Submitted	Submitted	Submitted
8	PSDE	15.08.25	15.08.25	18.08.25	18.08.25	Submitted	Submitted	Submitted	Submitted
9	MRM	18.08.25	18.08.25	26.08.25	26.08.25	Submitted	Submitted	Submitted	Submitted
10	Patriotic EB	18.08.25	18.08.25	12.08.25	28.08.25	Submitted	Submitted	Submitted	Submitted
11	Alternative EB	18.08.25	18.08.25	27.08.25	26.08.25	Submitted	Submitted	Submitted	Submitted
12	Together EB	19.08.25	23.08.25	01.09.25	29.08.25	Submitted	Submitted	Submitted	Submitted
13	LOC	21.08.25	21.08.25		29.08.25	Submitted	Submitted	Submitted	Submitted
14	AUR	21.08.25	21.08.25		29.08.25	Submitted	Submitted	Submitted	Submitted
15	Victoria Sanduța IC	22.08.25			02.09.25	Information	Submitted	Submitted	Submitted
16	PAM	23.08.25	23.08.25	29.08.25	28.08.25	Submitted	Submitted	Submitted	Submitted
17	BUN EB	24.08.25	29.08.25		06.08.25	Information	Submitted	Submitted	Missing
18	PL	24.08.25	29.08.25		08.09.25	Information	Information	Submitted	Submitted
19	UCSM	25.08.25	25.08.25		03.09.25	Information	Submitted	Submitted	Submitted
20	Tatiana Crețu IC	26.08.25			01.09.25	Information	Submitted	Submitted	Submitted
21	PN	26.08.25	11.08.25	29.08.25	25.08.25	Submitted	Submitted	Submitted	Submitted
22	NOI	03.09.25	03.09.25		12.09.25		Information	Submitted	Submitted
23	PPMM ¹⁴³	05.09.25	05.09.25				Information	Information	Information

- *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, 22 of the 23 electoral competitors confirmed to the CEC the opening of the "Electoral Fund" bank account.

- *Weekly reporting on income obtained and expenses incurred in the electoral campaign*

¹⁴³ According to the information available on the CEC website, PPMM does not have a bank account with the mention "Electoral Fund". In this respect, the competitor presented information that it did not obtain any income or make financial expenses. At the same time, the competitor submitted financial reports as of 15 and 22 September in the "Financial Control" ISS.

According to art. 58 para. (3) and (5) of the Electoral Code, electoral competitors shall submit to the CEC weekly, according to the schedule approved in the calendar of activities, reports on income obtained and expenses incurred during the electoral campaign.

During the monitored period, the registered electoral competitors were to submit their financial reports on 15.09.2025 and 22.09.2025. Table 6 shows information on the presentation of financial reports by the 23 electoral competitors. Thus, according to the official website of the CEC, 22 competitors submitted financial reports by 15.09.2025, and one electoral competitor, PPMM, informed the CEC about the non-opening of the electoral fund and about the lack of income and expenses.

Regarding the second weekly financial report, which was to be submitted to the CEC on 22.09.25, we find that 21 of the 23 electoral competitors submitted financial reports, and PPMM informed the CEC about the non-opening of the electoral fund and about the lack of income and expenses. We also found that the financial report of BUN EB was missing on the official website of the CEC.

At the same time, we found that PPMM submitted reports as of 15 and 22 September to the “Financial Control” ISS, even if it informed about the non-opening of the electoral fund and the lack of income and expenses. The reports include data on income and expenses from material donations.

We shall also mention that the reports on the financing of the electoral campaign downloaded from the “Financial Control” ISS do not allow viewing the date of submission of the report, an aspect that diminishes the transparency in monitoring the reporting of electoral competitors. In this regard, we recommend the CEC to ensure the transparency of the date of submission of financial reports by electoral competitors in the “Financial Control” ISS.

- *Management of the process by the electoral authority*

During the reporting period, the CEC adopted two decisions,¹⁴⁴ in which it analysed the information reported by electoral competitors as of 01.09.2025 and 08.09.2025, respectively. Based on this, the electoral authority ruled:

- To issue a warning to PAS for making payments for campaign services, including advertising on social networks, from a card account interconnected to the party's current account, instead of using exclusively the “Electoral Fund” bank account, as well as for late notification of the Commission about these accounts.
- To issue a warning to PNM for using a card account to collect donations and for making payments for campaign materials before the official opening of the “Electoral Fund” bank account, as well as for late notification of the Commission about these accounts.
- To oblige the Alternative EB (12.09.2025) to present within 3 days the originals of documents confirming cash donations by individuals, as a result of finding incoming payments exceeding one million MDL and suspicions about the legality of their collection. According to CEC Decision no. 4025/2025, the CEC ascertained the timely submission of the requested documents, and after checking the data, it did not find any violations of legal provisions.
- To issue a warning to the IC Tatiana Crețu for failure to communicate to the Commission in writing, by 1 September 2025, the opening of the “Electoral Fund” bank account.
- To issue a warning to the BUN EB for failure to submit the weekly financial report within the legal deadline and for initially submitting it only on paper, followed by late submission in the electronic system, which was caused by the refusal of the appointed treasurer to exercise his duties and his subsequent replacement.
- To issue a warning to PAS for incomplete and uneven reporting of expenses for electoral advertising on social networks and the internet, and to oblige it to submit corrected reports as of 1 and 8 September 2025.

¹⁴⁴ CEC decisions [no. 3971](#) of 12.09.2025 and [no. 4025](#) of 19.09.2025 on monitoring the financing of the electoral campaign of electoral competitors for the parliamentary elections of 28 September 2025, as of 1 September 2025 and 8 September 2025, respectively.

- To issue a warning to PPDA and LOC for using funds from the “Electoral Fund” account before declaring them to the Commission and for late submission of financial reports for the periods of 29-31 August and 1-7 September 2025.
- To issue a warning to the Alternative EB for failure to present in the financial report information about the services provided free of charge by an employee of a municipal enterprise (IMSL) for the electoral campaign, and to oblige it to present the corrected report on the financing of the electoral campaign as of 8 September 2025.
- To issue a warning to UCSM for failure to declare in the financial report expenses for advertising on social networks, and to oblige it to present the corrected report as of 8 September 2025.
- To issue a warning to PN for incomplete reporting of expenses for advertising on social networks and the internet in financial reports, and to oblige it to submit the corrected report on the financing of the electoral campaign as of 8 September 2025.
- To issue a warning to MRM for accepting financing from non-resident sources and incomplete presentation of expenses for advertising on social networks and the Google platform.
- To oblige PAS, Andrei Năstase, Olesea Stamate, PNM, PSDE, MRM, the Patriotic EB, the Alternative EB, the Together EB, Victoria Sanduța, PAM, UCSM, and PN to present at the end of the electoral campaign detailed information on the expenses actually incurred for electoral advertising on the internet and on all social networks, with the attachment of documents confirming these expenses.

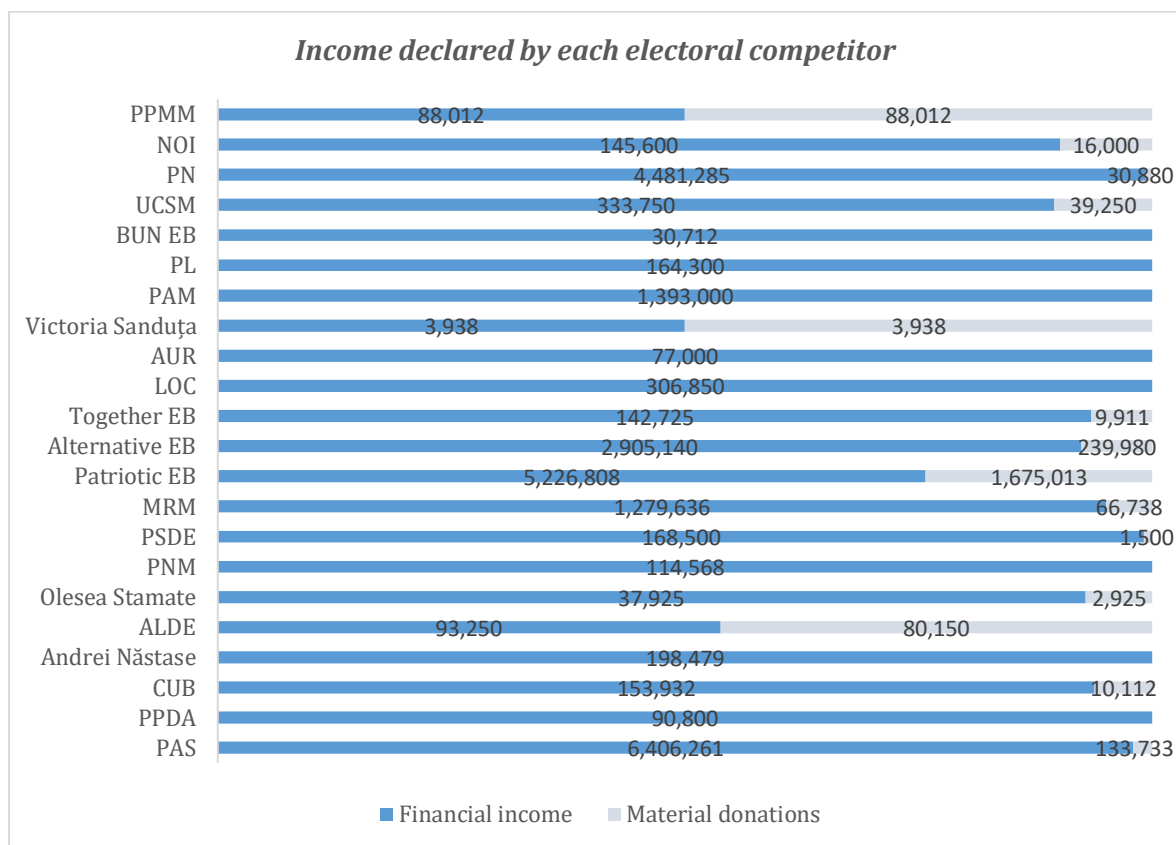
5.2. Income and expenses reported by electoral competitors to the CEC

5.2.1. Reported income and its source

For the period of 8 to 21 September 2025, 22 electoral competitors reported income totalling MDL **23,842,469**, of which MDL 2,398,142 from material donations (10% of the total declared income).

The most income was declared by PAS – 27% of the total, followed by the Patriotic EB – 22%, PN – 19%, and the Alternative EB – 12% (see Chart 4).

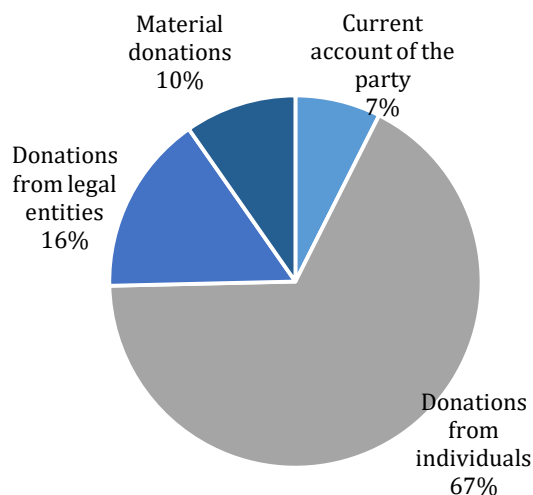
Therefore, we find that 80% of the total declared income was reported by 4 electoral competitors, and only 20% – by the other 18 electoral competitors. We note that the same four electoral competitors reported the highest incomes in the previous reporting periods.



Depending on the source of income, we find the following situation (see Chart 5):

- 7% (MDL 1.8 million) were the funds transferred from the current account of political parties to the “Electoral Fund” account. Of these, 32% were from allocations from the state budget (PAS, Alternative EB, Together EB), and 68% were from private sources (PAS, Patriotic EB, Together EB, PSDE, MRM, BUN EB).
- 67% (MDL 16.5 million) were donations from individuals, collected by 19 electoral competitors (PAS, PPDA, CUB, ALDE, PNM, PSDE, MRM, Patriotic EB, Alternative EB, Together EB, LOC, AUR, UCSM, PN, PAM, PL, NOI, Andrei Năstase, Olesea Stamate). Most of the income from donations from individuals were declared by PN (MDL 4.5 million), which represents about 27% of the total income from this source.
- 16% (MDL 3.0 million) were from financial donations from legal entities collected by 5 electoral competitors (PAS, MRM, Alternative EB, Together EB, PAM). Most of the income obtained from financial donations from legal entities were declared by PAS (MDL 2.2 million), representing about 74% of the total donations of this kind reported by the 5 electoral competitors.
- 10% (MDL 2.3 million) were from material donations, reported by 14 electoral competitors (PAS, CUB, ALDE, PSDE, MRM, Patriotic EB, Alternative EB, Together EB, UCSM, PN, Olesea Stamate, Victoria Sanduța, NOI, PPMM). Most of the material donations were declared by the Patriotic EB (MDL 1,675,013), which constitutes about 70% of the total material donations declared during this period.

**Sources of income declared by electoral competitors
(8-21 September 2025)**



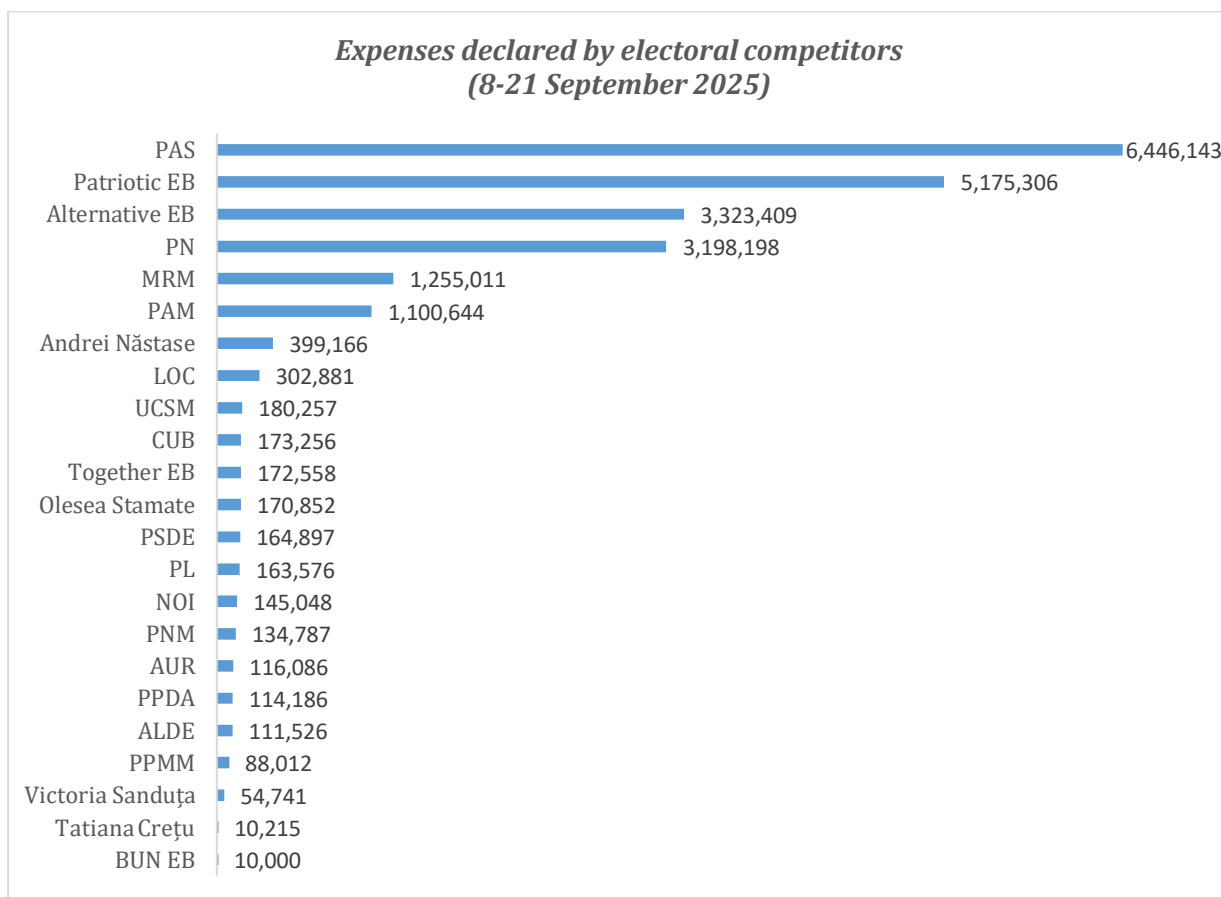
In the case of reported material donations, 82% were works and services and 18% were goods.

Compared to the data reported by electoral competitors for the period of 29 August to 7 September, we found that in this reporting period, donations from individuals and legal entities remained the main sources of funding, representing 67% and 16% of the total, respectively. At the same time, there was a decrease in the funds transferred from the current account of political parties to the “Electoral Fund” account, from 38% to 7%, while the income from material donations increased significantly, from 6% to 10%.

5.2.2. Declared expenses and their destination

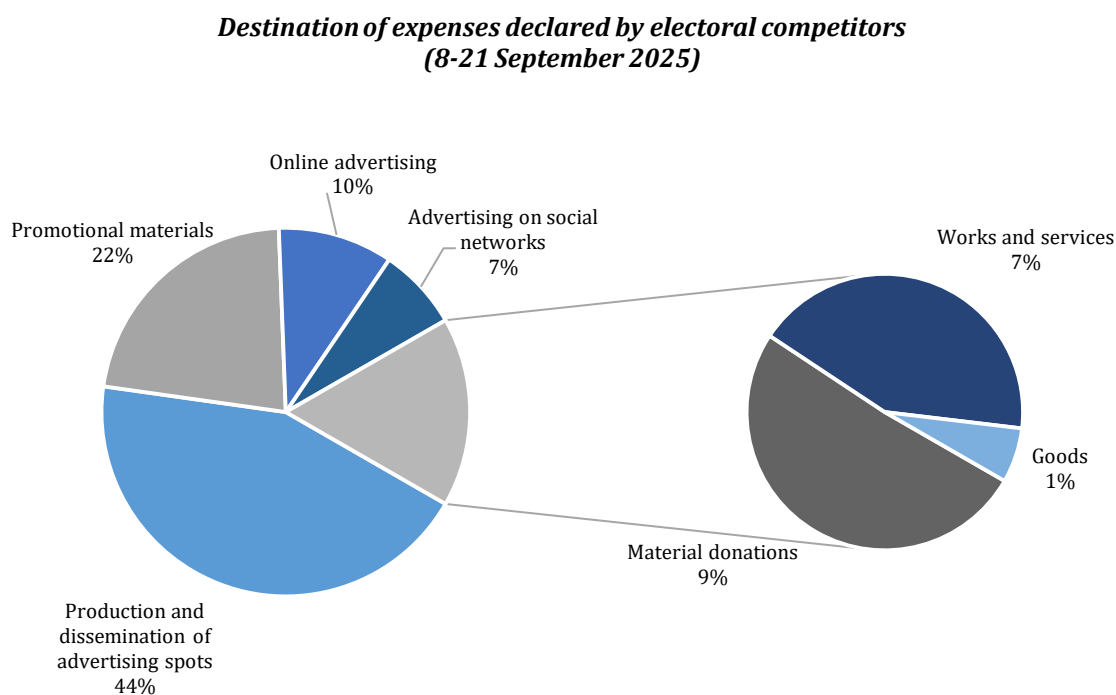
According to the official website of the CEC, for the period of 8 to 21 September 2025, 23 electoral competitors declared expenses totalling **MDL 23,010,755**, of which MDL 2,390,142 were from material donations. Most expenses were declared by PAS – 28% of total reported expenses, followed by the Patriotic EB – 22%, the Alternative EB and PN with 14% (see Chart 6). Therefore, like in the case of income, we find that 78% of total expenses were of 4 electoral competitors, and only 22% – of the other 19 competitors.

Chart 6



In terms of destination of the reported financial expenses, the most – 44% – were for the production and dissemination of advertising spots, followed by expenses for promotional materials – 22%, online advertising – 10%, and advertising on social networks – 7% (see Chart 7).

Chart 7



5.3. Civic monitoring of electoral campaign financing

The electoral competitors' expenses made between 8 and 21 September 2025 were estimated based on the reports made by Promo-LEX observers. After estimation, these expenses were contrasted with the expenses declared to the CEC in reports on the financing of the electoral campaign. As methodological benchmarks for estimating expenses, we applied the minimum market prices identified for services, goods, and works used for electoral campaigning purposes.

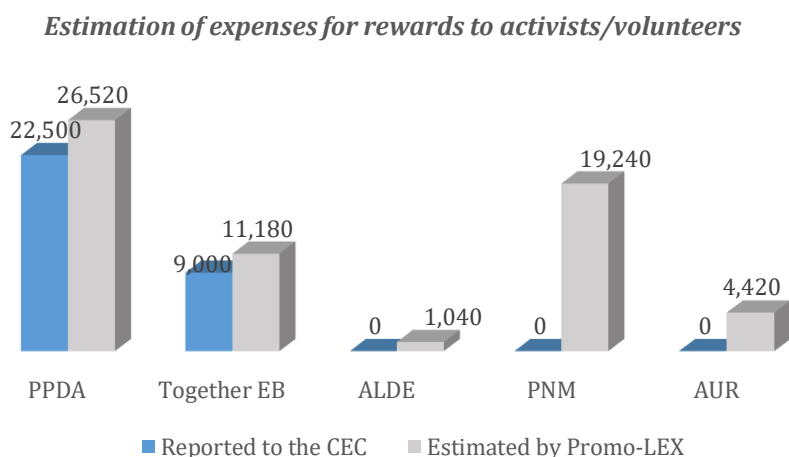
We shall note that these prices were applied uniformly for all electoral competitors. In this regard, we assume that there may be some divergences between the costs applied by Promo-LEX and those indicated by electoral competitors (both in reports of financial expenses and of expenses from material donations).

5.3.1. Estimation of expenses for rewards to volunteers/activists

During the monitoring period, Promo-LEX observers reported activities involving activists. Expenses were estimated based on the amount of the minimum salary per country,¹⁴⁵ with application of the tariff of MDL 5,500 / month or MDL 32.54 / hour (MDL 260 / day).

For four electoral competitors, unreported expenses amounting to at least **MDL 30,900** were estimated (see Chart 8).

Chart 8



The most estimated unreported expenses for rewards to volunteers/activists were in the case of PNM – MDL 19,240, followed by AUR – MDL 4,420, and PPDA – MDL 4,020.

5.3.2. Estimation of expenses for promotional materials

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

Based on the observed information, unreported expenses were estimated for only one electoral competitor, PNM, amounting to at least MDL **5,786**.

¹⁴⁵ [Government Decision](#) no. 846 of 18 December 2024 on establishing the amount of the minimum salary per country for 2025.

5.3.3. Estimation of expenses for fixed spaces/devices for advertising

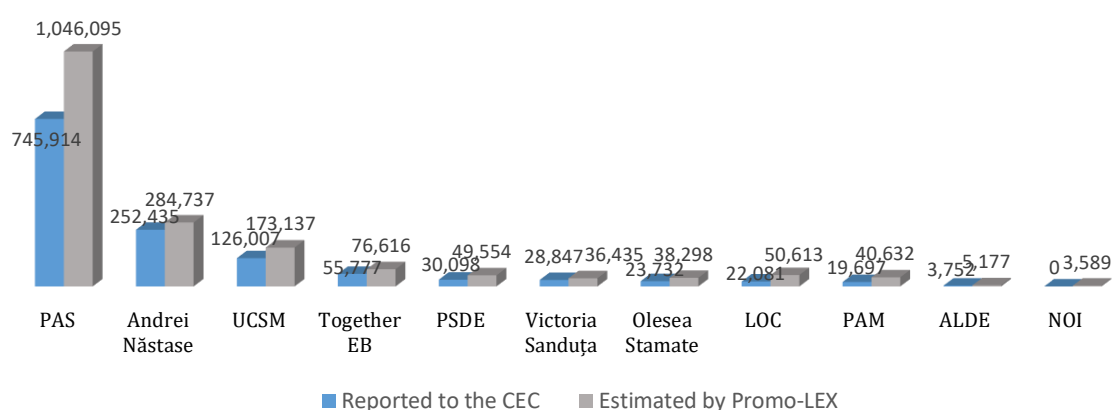
Promo-LEX observers reported cases of use of street advertising by some electoral competitors. Based on the reports received from them, unreported expenses were estimated in the case of one competitor, LOC, amounting to at least **MDL 6,174**.

5.3.4. Estimation of expenses for advertising on social networks

Sponsored advertising on social networks was widely used in the context of the electoral campaign. Based on the information identified in the public reports accessible on Meta, unreported expenses amounting to **MDL 693,242** were estimated for 11 electoral competitors. The most expenses estimated as unreported were in the case of PAS – MDL 300,182, followed by UCSM – MDL 47,130, Andrei Năstase (IC) – MDL 32,302, and LOC – MDL 28,532 (see Chart 9).

Chart 9

Estimation of expenses for social networks



5.3.5. Estimation of expenses for the organization of electoral events

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

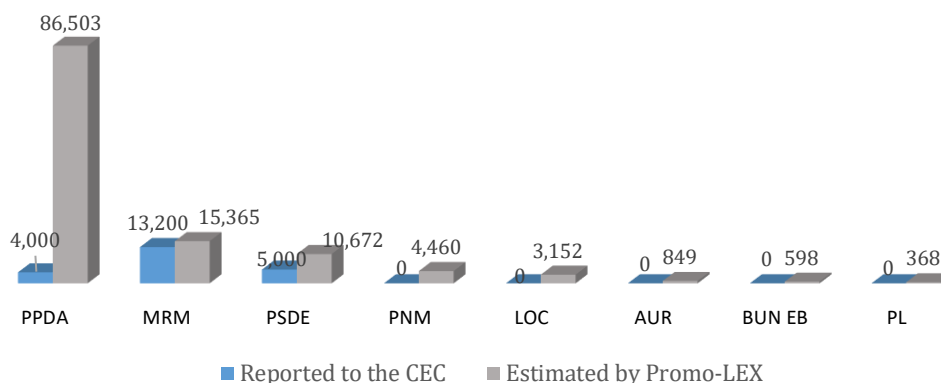
Based on the information collected by Promo-LEX observers, unreported expenses of at least **MDL 4,038** were estimated for PSDE.

5.3.6. Estimation of fuel and transport expenses

During the monitoring period, Promo-LEX observers reported electoral competitors' activities involving travel to various localities in Moldova, which determined transport expenses.

Based on the information mentioned, in the case of eight electoral competitors, estimated unreported expenses were at least **MDL 99,766**. The most unreported expenses were in the case of PPDA – MDL 82,503, followed by PSDE – MDL 5,672, and PNM – MDL 4,460 (see Chart 10).

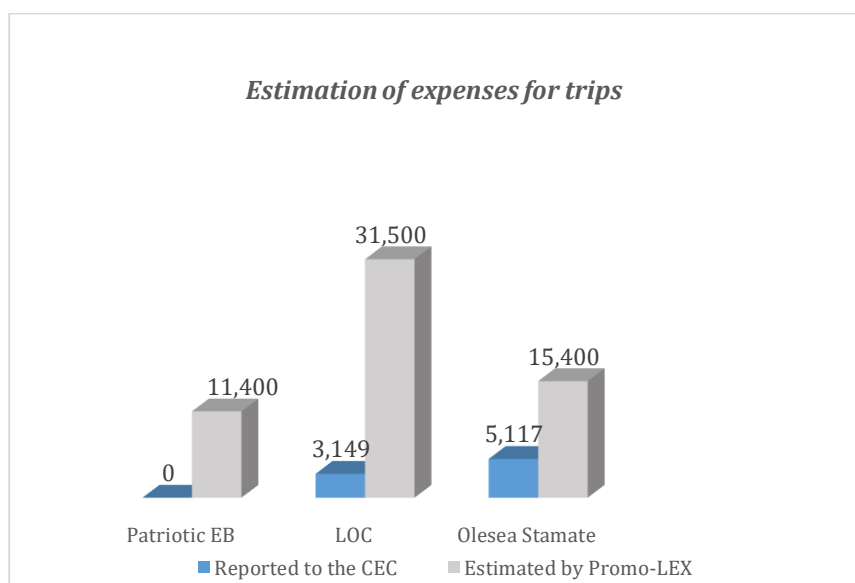
Estimation of transport expenses



5.3.7. Estimation of expenses for trips abroad

According to Promo-LEX observers, electoral competitors carried out trips abroad. Thus, unreported expenses were estimated for the organization of trips amounting to at least **MDL 50,034** in the case of 3 electoral competitors: LOC – MDL 28,351, Patriotic EB – MDL 11,400, and Olesea Stamate (IC) – MDL 10,283. (see Chart 11)

Chart 11

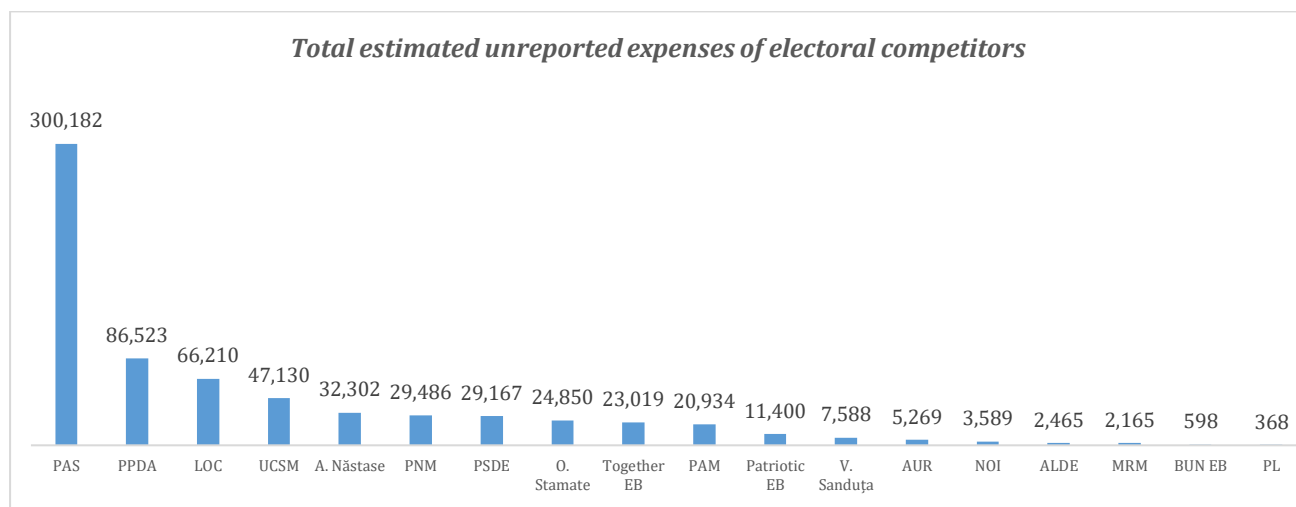


5.3.8. Conclusions on the civic monitoring of the electoral campaign

In the context of the above, for the electoral campaign activities carried out by 18 electoral competitors, the Promo-LEX OM estimated unreported expenses amounting to at least **MDL 693,243**.

The most unreported expenses were in the case of PAS – 43% of total estimated expenses, followed by PPDA – 12%, LOC – 10%, and UCSM – 7% (see Chart 12).

Chart 12



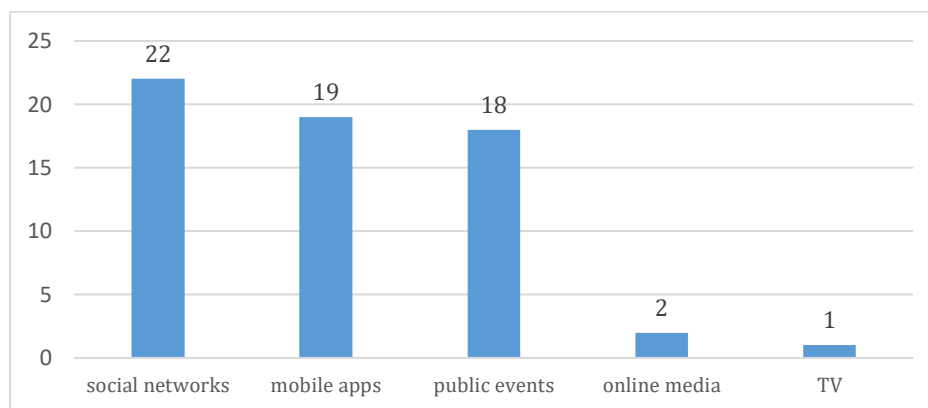
In terms of the destination of the estimated unreported expenses, the most were estimated for advertising on social networks – 72%, followed by expenses for transport – 14%, expenses for trips abroad – 7%, and rewards to volunteers/activists – 4%.

For the same reporting period for the early parliamentary elections of 2021, unreported expenses totalling MDL 1.3 million were identified, of which 41% were intended for promotional materials, 15% for rewards to volunteers/activists, and 14% for office expenses.

VI. HATE SPEECH AND INCITEMENT TO DISCRIMINATION

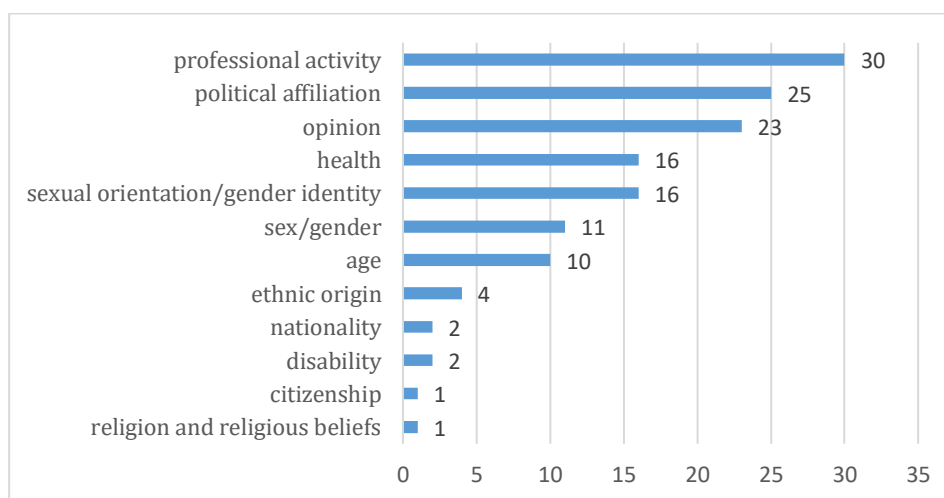
Between 5 and 18 September 2025, at least 72 cases of hate speech were identified, 62 of which occurred in an electoral context. About 66% of cases of hate speech were identified in mobile apps and on social networks (see Chart 13). In total, the 62 cases of hate speech were viewed by more than 2,600,000 people.

Chart 13. General categories of sources



Most often, hate speech was generated by men (36 cases) and people aged 35 to 50 (22 cases). The hate speech identified was based on different criteria, such as professional activity, political affiliation, opinion, sexual orientation, gender identity, health, and others (see Chart 14).

Chart 14. Criteria behind hate speech



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

Politicians and electoral competitors use hate speech directed against their opponents or against social groups such as LGBT people and women. Hate speech based on political opinion, sexual orientation, and/or gender identity has taken highly serious forms, such as incitement to discrimination and/or incitement to violence.

For example, on 18 September 2025, during the electoral debates organized by the Contact Centre in Balti, Constantin Cojocari, mayor of Edinet and LOC's candidate for MP, said:

“Moldova is a country in which the Orthodox Christian element prevails and a country where freedom of expression is on a level with it. No matter what your views are on certain processes, we consider this element needs to be dealt with; it needs to be dealt with, but not regulated legislatively under any formula. Since, I decipher, the person who assumes an element that differs

from everyone else or from a large part of the majority, it is out of the ordinary. We will not treat them with disrespect. We will try to help them, no matter what age they are, through treatment. And social inclusion in Moldova remains the same, putting us all within certain rigorous limits. LOC is a party of elements of tradition and respect for laws, conformities, and normalities. And a country in which non-normality becomes a central element, we consider it discriminatory in relation to the majority. They will be dealt with by doctors, not politicians.”¹⁴⁶

Constantin Cojocari indirectly incited discrimination against LGBT people by promoting the idea that they must be “treated medically” and not politically, if the party he represents will get into the Parliament. The justification for this action is supported by the fact that Moldova “is a country in which the Orthodox Christian element prevails,” and the party he represents is “a party of elements of tradition and respect for laws, conformities, and normalities.” Thus, Constantin Cojocari qualifies LGBT people as “sick” and supports their “treatment”, while in 1990, the World Health Organization¹⁴⁷ excluded homosexuality from the list of mental illnesses, based on scientific research that proved that there are no differences in mental health between homosexuals and heterosexuals.

The League of Cities and Communes (LOC) party did not dissociate itself from the statements of its representative. Of the eight electoral competitors who participated in the debate, only Arina Spătaru, president of ALDE, and Victoria Sanduța, independent candidate, intervened to combat hate speech. The debate moderator did not intervene to stop this message.

Another example of homophobic speech is the one generated by Ion Ceban, mayor of Chisinau, president of the National Alternative Movement (MAN) party and the Alternative EB’s candidate for MP. At a press conference held on 8 September 2025, Ion Ceban said:

Ion Ceban: I said it and I will repeat. It is my personal position and that of many of our colleagues.

Journalist: From the bloc.

Ion Ceban: Exactly, from the bloc. We advocate for a traditional family, for an approach, in this sense, to our values, which we know from our ancestors, from our grandparents, from our parents, and I am categorically against these manifestations, as you called them, homosexual, transgender, whatever else, to parade in all the corridors, so to speak, in the infrastructure of roads and sidewalks of Chisinau, to have this propaganda in educational institutions under the pretext of civic education. We have many other problems that we need to address today. [...] I told you that there are a lot of attempts, and you have seen, too, we can’t walk away from it, when they enter educational institutions as different NGOs that come to promote this agenda under different pretexts. I said, I repeat, I am categorically against these things in educational institutions and in the public space as manifestations promoting these so-called “homosexual values”, I am categorically against it. Once more, I repeat it for you, so my words don’t get misinterpreted. On the other hand, I absolutely fully respect all rights, all rights: the right to education, health, employment, respect for people. What you do at home, or wherever in a space that is not public, is your business. Absolutely no one makes you, forbids you, or gives you advice or anything else.¹⁴⁸

Ion Ceban’s speech is antagonistic (“traditional family” v. LGBT people), justifying discrimination against LGBT people (violation of the right to freedom of assembly) by promoting traditional family and values “from our grandparents” and not accepting the promotion of “homosexual values” in educational institutions. We shall remind that, in 2013, the Venice Commission¹⁴⁹ pointed out that “homosexuality, as a variation of sexual orientation, is protected under the ECHR and as such, cannot be deemed contrary to morals by public authorities, in the sense of Article 10 § 2 of the ECHR. [...] there is no evidence that expressions of sexual orientation would adversely affect minors, whose interest is to receive relevant,

¹⁴⁶ Constantin Cojocari, [public message](#), electoral debate, 18.09.2025, min. 01:04:34, last accessed: 19 September 2025.

¹⁴⁷ World Health Organization, [press release](#), 17.05.2019, last accessed: 22 September 2025.

¹⁴⁸ Ion Ceban, [public message](#), Alternative EB. Live press conference, 08.09.2025, min.: 57:03, last accessed: 22 September 2025.

¹⁴⁹ Venice Commission, [Opinion](#) on the issue of the prohibition of so-called “Propaganda of homosexuality in the light of recent legislation in some Council of Europe Member States,” 14-15.06.2013, pt. 80, last accessed: 22 September 2025.

appropriate and objective information about sexuality, including sexual orientations.” In fact, both in previous electoral campaigns and in his capacity as mayor of Chisinau, Ion Ceban instigated discrimination against this group of people, but also directly discriminated, by banning the organization of the Pride March in 2025.

During the monitoring period, speeches were also identified that promoted stereotypes and prejudices in relation to Roma people. For example, on 8 September 2025, Renato Usatîi published a video message that, despite being initially intended as a reaction to an electoral incident, ended up to be a message that harmed the dignity of not only a counter candidate, but also of a social group.

“Anyway, Pantelevna watches Budulai [Soviet film “The Return of Budulai”] and says, ‘At this moment, Mr. Renato, two horses were passing on the street, and Marian’s eyes changed, at that very second, and like your girls worked and put it in newspapers, Marian’s eyes simply changed and he started tearing down Our Party newspapers. You might say there was a moment when the madman ran after the horses, too,’ and Pantelevna says, ‘I nearly went out the window. I say, ‘Boy, stop, the horses are not yours.’ He was obviously ashamed, but somehow he was prepared to take something, so he took our newspapers.’ People, anyway, when you see Radu Marian in a village, first of all, keep your horses in your yard and keep them tied well. Second, if there is any horse noise, if the horse starts making noise, take care of everything you have at the house, and I will tell our people to stop handing out Our Party newspapers when they see horses, so we don’t get in trouble. Because if Radu Marian comes out twice more like that, we’re printing hundreds of thousands of newspapers for nothing.”¹⁵⁰

Renato Usatîi, in his message, referred to the Soviet film “The Return of Budulai” (1979), in which the main character is a Roma man. He returns to his village after many years and strives to integrate and be accepted in the collective farm. The film takes place around an incident when some horses are stolen from the collective farm and the Roma are immediately suspected by the community, who treated them according to stereotypes. Thus, the community views Budulai with distrust, believing that he or “his people” were involved in the theft. As Radu Marian, PAS candidate for the position of MP, comes from a family with Roma roots, Renato Usatîi’s message promoted the stereotype that Roma are involved in illegalities. He also told his followers, but also his party colleagues, to take care of their belongings when Radu Marian would be around.

Xenophobic and sexist speeches continue to be used by electoral competitors and politicians. An example is the statement of Victoria Furtună, president of the Greater Moldova party (PPMM) and candidate for the position of MP. On 10 September 2025, at a public event, Victoria Furtună declared:

“Ms. Sandu, you are taking care of Romania and Ukraine more than of us. You openly declare yourself a citizen of a foreign country. You have destroyed our mother tongue. Maia, you don’t make deals with the country. [...] You are a person of the foreign world, without children, without family, and without roots. In a few years, you will find a comfortable place in Brussels. For you, ‘country’ is a foreign concept; it is good wherever you are praised, applauded, and given tribute.”¹⁵¹

On the one hand, Victoria Furtună presented the activity of President Maia Sandu as a form of “foreign loyalty”, insinuating that she does not belong to the community and is an internal enemy. On the other hand, sexist language is used, whereby a woman’s role in political life is determined primarily by her civil status and the existence of children. Although the message was directed against Maia Sandu, it indirectly affected women from Moldova who have dual citizenship and have a different civil status than the one promoted by Victoria Furtună.

¹⁵⁰ Renato Usatîi, [public message](#), Facebook, 08.09.2025, min.: 03:07, last accessed: 22 September 2025.

¹⁵¹ Victoria Furtună, [public message](#), Facebook, 10.09.2025, min.: 02: 41 / min.: 04:04, last accessed: 22 September 2025.

Electoral messages promoting gender stereotypes and prejudices were published by the Moldovans Alliance Party (PAM), both on the party's website and on social networks.

"[...] the purpose of a Moldovan woman is to give birth and educate Moldovans – worthy citizens of her homeland."

"Women can run the state no worse than men; they can do science or business. But none of these roles can be compared to the most important task of mankind – keeping the family home, procreating the nation, and educating worthy children. This role can only be performed by a woman."

"[...] there is nothing more important for a Moldovan woman than the mission of mother and wife. This is God's will, and deviation from this rule conceals in itself the danger of degradation and loss of the nation."

"Moldovan men, love and protect your women. Remember: as heads of families, you are responsible for the material and spiritual well-being of your family."¹⁵²

According to them, women are reduced to the role of reproduction and upbringing, and this role is directly related to "duty to the motherland". In other words, women are presented as a "means of preserving the nation," and not as individuals with their own freedoms and aspirations. At the same time, PAM promotes the idea that only a woman can "fulfil" this role, ignoring the sharing of parental and domestic responsibilities with men. The party also supports rigid gender roles and patriarchy in that men are responsible for the "material and spiritual well-being of the family" as "heads of families", and women must be protected by them. Deviation from this "rule" is presented as a "danger" for the whole society, stigmatizing women and men who choose not to start families and not to have children.

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

Between 5 and 18 September 2025, hate speech was again identified in the form of incitement to violence, sexist speech, but also promotion of stereotypes and prejudices that were generated by opinion leaders, supporters of political parties, etc. For example, Radu Dutcovici published two messages justifying and inciting violent actions against people with a different political opinion. The two messages were viewed by more than 190 thousand people and shared 3 thousand times.

On 5 September 2025, he said in a video on Facebook:

"When Dodon comes to the diaspora, you kick him; when Tarlev comes, when the others come to your villages, to our districts, you kick them like those from Peresecina did it, the brave patriots from Peresecina ... they kicked the Șor supporters and Lungu.¹⁵³ You do the same, you kick them in the ass when the likes of Dodon, Voronin, Vlah, Tarlev, Ceban's Alternative, Usatîi and the others, Costiuc and the others come and want to talk to you. You kick them in the ass, because their goal is to divert the European course, and they are working against the European course and against accession to the European Union."¹⁵⁴

Later, on 10 September 2025, Radu Dutcovici published another video message by which he instigated discrimination based on opinion:

"Now, I'm asking you very much to share this live, because I see that the trolls have already logged in and they are active, they are active to the maximum and I will block them after I end this live and they will never have access to my profile, to my broadcasts, and to everything I talk about,

¹⁵² Moldovans Alliance Party, [message](#), pt. 92-94, last accessed: 23 September 2025.

¹⁵³ On 31 August 2025, in Peresecina village, Orhei district, an altercation took place between supporters of PAS and representatives and supporters of the Șor party, declared unconstitutional. Radio Moldova, [News](#) "Altercations in Peresecina: supporters of the Șor group, detained and investigated by the police", 1 September 2025, last accessed: 24 September 2025.

¹⁵⁴ Radu Dutcovici, [public message](#), Facebook, 05.09.2025, min.: 17:44, last accessed: 18 September 2025.

okay? Because they don't deserve it, they don't deserve a European future, they, all the traitors of the country, deserve and have to be deported to Siberia, right? That's what they deserve, because if they want Russian world, they have to leave us alone to live freely at home, and let them go to hell to Siberia and let them be deported with trains like they deported our grandparents, our great-grandparents, in cattle cars, and let them feel on their own skin what Russian world means, right? That's how I'm going to answer to trolls and country traitors."¹⁵⁵

In the same period, during an action in support of Evghenia Guțul, organized by the Victory PB on 5 September 2025, Olesya Vitnyanskaya, an activist of the bloc, sent a public message by which she instigated violent actions on the grounds of political affiliation:

"On 28 September, we will drive them out of Moldova with a broom, and on 29 September, we will welcome back Evgenia Alexandrovna and everyone else."¹⁵⁶

Death threats were sent by unknown persons to Veacelsav Jucov, municipal councillor in Balti, representing the Revival Party, and Marina Tauber, MP and vice-president of the Șor Party, declared unconstitutional. These threats were based on the criterion of political opinion and were made public by the persons they were addressed to.

"You will always be with no one, PAS will win, and you have only two options: join us or lose and flee to your damn Russia."

"We will win anyway, and you have no choice. We'll come after you and kill you. We have no choice."¹⁵⁷

"You will always be a nobody, PAS will win, and you have only two options: join us or lose and flee to your damn Russia. We have to be with our people, not go against them. And you will be responsible for it. If you don't stop campaigning for the traitors from Kremlin, we'll come after you and your family."¹⁵⁸

A message that stigmatizes people with a different political opinion was generated by Alexei Buzu, minister of labour and social protection. Although Alexei Buzu later made a public apology, his message was picked up and spread by numerous sources, channels and pages on social networks and thus was viewed by over 9 thousand people.

"It is not enough for you to come to the vote and vote for PAS. It's not enough. You need to talk to people in your neighbourhoods. Talk to people at work. You need to talk to family members. Friends, you have to mobilize, you have to mobilize people. This is about our country. On the 28th there's going to be an exercise where we're going to put a mirror in front of us and see what's there. Whether we are people or we are cattle."¹⁵⁹

During the monitoring period, sexist speech was used in relation to both women and men. For example, during a protest organized by the Victory PB on 13 September 2025, Vladislav Garshtya said:

"Mr. Perciun, how did you come to be the minister of education, when you were born in 1991, you have not created a family, you have no children, and how can you know how to get involved in

¹⁵⁵ Radu Dutcovici, [public message](#), Facebook, 10.09.2025, min.: 05:15, last accessed: 18 September 2025.

¹⁵⁶ Olesya Vitnyanskaya, [public message](#), public event, 05.09.2025, min.: 02:59:42, last accessed: 23 September 2025.

¹⁵⁷ Unknown, [message](#), Telegram, 10.09.2025, last accessed: 23 September 2025.

¹⁵⁸ Unknown, [message](#), Telegram, 10.09.2025, last accessed: 23 September 2025.

¹⁵⁹ Alexei Buzu, [public message](#), public event, 07.09.2025, min.: 00:07, last accessed: 23 September 2025.

education? To introduce LGBT propaganda in schools? My dear, I will put it this way, Maia Sandu, if you didn't know how to create a family, you have no children, how do you, Maia Sandu, introduce LGBT propaganda? I would like to say this: I don't curse, but I would very much like those who supported the LGBT march, together with MPs and members of the government – may God make a child of yours walk that path to become a member of, I will put it this way, this LGBT junta.”¹⁶⁰

This message, on the one hand, supports gender stereotypes and prejudices according to which the involvement in political life of a man or a woman is directly determined by his/her civil status. In other words, Vladislav Garshtya supports the idea that it is not skills and professional training that matter in political activity, but whether that person is married and has children. On the other hand, the author makes use of the phrases “LGBT propaganda” and “LGBT junta” to present LGBT people as a hostile and dangerous group. The “pseudo-curse” is used to project an LGBT person as one with a shameful and undesirable fate.

A message of hatred by association that took the form of both promotion of stereotypes and insult based on the criterion of health was directed against Ludmila Adamciuc, human rights activist and PAS candidate for the position of MP. The message was sent privately by Vlad Tverdohleb and made public by Ludmila Adamciuc in the form of a story on Facebook on 13 September 2025.

“You're the mother of a Down, not a politician. Humble yourself, it's a pity the second one seems healthy. She's tied for life to your moronic friend.”

The author of the message reduces the role of Ludmila Adamciuc to that of the mother of a child with Down syndrome, presented as something condemnable and shameful, thus cancelling her role as an activist and a woman involved in political life. At the same time, the message also takes the form of an insult on the grounds of prejudice (“your moronic friend”) and a form of disregard (“it's a pity the second one seems healthy”) in relation to her children.

¹⁶⁰ Vladislav Garshtya, [public message](#), public event, 13.09.2025, min.: 00:02, last accessed: 23 September 2025.

RECOMMENDATIONS

To the Parliament of Moldova:

- To regulate political and electoral financing by third parties.
- To examine the appropriateness of amending art. 115 of the Electoral Code by reducing the time limit of 10 days during which it is allowed to change the list of candidates or by establishing exceptions to this rule for cases where the change of the list would be possible under justified circumstances even until the day before the voting day.
- To revise the Electoral Code in order to clarify the limits of official campaign activities for the president of Moldova, the prime minister, and the speaker of the parliament of Moldova.
- To establish by law a clear mechanism for checking the integrity of candidates for membership in electoral bodies and to explicitly define the verification criteria and procedure.
- To establish regulations for the use of diplomatic resources in the electoral campaign.

To the Central Electoral Commission:

- To establish in regulations a clear mechanism for checking the integrity of candidates for membership in electoral bodies and to explicitly define verification criteria and procedure, so that the process is transparent and uniformly applied.
- To supplement the guidelines on prevention and control of the use of administrative resources in electoral processes with clear rules regarding the delimitation of competences between the CEC and the GPI.
- To review and strengthen the internal procedures for examining electoral complaints by developing a clear procedure for reasoned replies, explicitly addressing all aspects of the complaint, according to art. 91 of the Electoral Code, and to organize training sessions for CEC members regarding international standards.
- To examine the issue of third parties, both in terms of future legal regulation and in terms of influencing the voting results.
- To ensure the timely analysis and verification of the weekly reports on the financing of the electoral campaign submitted by electoral competitors.
- To ensure the publication of the date of submission of financial reports by electoral competitors in the "Financial Control" ISS.

To the Ministry of Foreign Affairs:

- To monitor and report the use of diplomatic resources in electoral campaigns.

ABBREVIATIONS

para. – paragraph

ALDE – Alliance of Liberals and Democrats for Europe Political Party

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

PB – political bloc

SPPB – Special Purpose Police Brigade

EB – electoral bloc

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

CUB – Coalition for Unity and Welfare Political Party

GPI – General Police Inspectorate

NPSI – National Public Security Inspectorate

lit. – letter

LGBT – lesbian, gay, bisexual, transgender

LOC – League of Cities and Communes Political Party

MFA – Ministry of Foreign Affairs

OM – Observation Mission

MRM – I Respect Moldova Political Party Movement

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

PNM – National Moldavian Party

PL – Liberal Party

PLDM – Liberal Democratic Party of Moldova

PN – Our Party
PPDA – Democracy at Home Political Party
PPNM – National Moldavian Political Party
PPMM – Greater Moldova Political 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
UCSM – Christian Social Union of Moldova Political Party
ATUG – Autonomous Territorial Unit of Gagauzia
EU – European Union

ANNEXES

Annex no. 1. Description of cases assessed by the Promo-LEX OM as use of administrative resources

Taking credit for goods, works/services for public use paid with public money

- On 11 September 2025, PAS candidates Mihail Druță and Ana Butucea met with voters in the province of Genoa, Sestri Levante, Italy. During the event, the candidates spoke about the achievements of the PAS government, about the party's goal to integrate Moldova into the EU and ensure peace.
- According to the post made by the organization in Chisinau, Centru sector, on 12 September 2025, Natalia Străjescu, head of the Department of Education, Youth, and Sports of Centru sector, Chisinau City Hall, attended a meeting with teachers of the Dumitru Matcovschi Gymnasium. At it, she spoke about "the considerable support the school received from the Chisinau City Hall led by Ion Ceban." Natalia Străjescu is presented in the post as "president of MAN Education Center and representative of the Alternative bloc."
- On 17 September 2025, PAS candidate Mihail Druță shared a digital leaflet on his Facebook page, in which he associated the image of President Maia Sandu with that of the party and gives PAS the credit for the achievements of the government and the president in terms of the facilities obtained for Moldovans in Italy in recent years.
- On 17 September 2025, PAS candidate Igor Grosu had an electoral meeting with residents of Mascauti v., Criuleni d. The PAS president, on behalf of the party, took credit for the construction of several local/regional infrastructure objects and for repair works, such as construction of the water supply network, renovation of the street lighting network, construction of a sports complex, repair of the road from Mascauti to Branesti, etc.
- On 18 September 2025, a video was posted on PAS Stefan Voda Facebook page, in which the mayor of Rascaieti v., Stefan Voda d., Ludmila Zagoreț, gives credit to the "PAS government" for the infrastructure projects implemented in the village in recent years on public money.
- On 18 September 2025, a video was posted on PAS Stefan Voda Facebook page, in which the mayor of Antonesti v., Stefan Voda d., Nadejda Morari presents the infrastructure projects realized during the last years on public money as being due to the "PAS government".
- On 20 September 2025, PAS candidate Andrian Cheptonari posted a video in which he, together with Elvira Stați, director of Ungheni District Hospital, spoke about the modernization of the hospital infrastructure on public money, calling voters to vote for PAS.

Use of state institutions for the purpose of electoral promotion

- On 11 September 2025, in the town hall of Raculesti v., Criuleni d., PAS electoral display was seen on the interior wall. Mayor Tudor Sclifos is a member of PAS.
- On 15 September 2025, on a table in the town hall of Balabanesti v., Criuleni d., calendars (A3 format) and electoral newspapers of PAS were observed. The front page of the newspapers displayed the photo of the local mayor Ion Cotoman.
- On 15 September 2025, on a table in the town hall of Climautii de Jos v., Soldanesti d., at the door to PEB 31/7, printed advertising (newspapers, A3 calendars) of PAS were observed.
- On 15 September 2025, a Promo-LEX observer found in the town hall of Raculesti, Criuleni d., an election poster of PAS placed on the interior wall of the institution. The local mayor was elected from PAS.
- On 15 September 2025, a Promo-LEX observer found on the information board of the town hall of Suhuluceni, Telenesti d., a flyer of PAS.
- On 16 September 2025, on a table in the town hall of Floritoaia Veche, Ungheni d., campaign newspapers of PAS were observed.
- According to the post of 18 September 2025 on the Facebook page of PAS Stefan Voda, in the office of the mayor of Volintiri v., Stefan Voda d., the electoral leaflet of PAS is placed on the wall.
- On 19 September 2025, a Promo-LEX observer found at the entrance to the town hall of Chirileni v., Ungheni d., two copies of the PAS Volunteer Guide on one table, and PAS leaflets on another table.
- On 24 September 2025, after the Government meeting, several ministers made statements to the press in the lobby of the Government, with its corporate emblem in the background. At least the ministers Ala Nemerenco, Sergiu Prodan, and Doina Nistor urged citizens to vote for the continuation of the actions taken by the acting government and for the continuation of the "European road". The actions in question may favour PAS.

Involvement of public sector officials / mayors in the campaign during working hours

- On 11 September 2025, Prime Minister Dorin Recean, PAS candidate, had a meeting with voters in Rosietici Vechi v., Floresti d. The information leaflets about the organization of the event were stylized according to the PAS campaign leaflets. The event was attended by local teachers, town hall employees, and the president of the District Council.
- On 11 September 2025, the mayor of Tipala v., Ialoveni d., Silviu Bivol participated in the electoral meeting of PAS candidate Petru Frunze with medical workers from Tipala.
- On 12 September 2025, in one of the restaurants in Cimislia, an electoral meeting was held with the participation of Igor Dodon, Patriotic EB candidate. The event was attended by the mayor of Ialpujeni v., Cimislia d., Vitalie Burdujan. A member of PEB 11/01 Tamara Seleşcaia was seen among participants.
- On 12 September 2025, the mayor of Cietu v., Cantemir d., Valeriu Carp participated together with some town hall employees in the meeting organized in Cantemir by CUB candidates Igor Munteanu, Rodica Gramma, and Eugen Surdu.
- On 12 September 2025, the mayor of Cociulia v., Cantemir d., Vladimir Putregai participated in the electoral meeting of CUB candidates Igor Munteanu, Rodica Gramma, and Eugen Surdu with local citizens.
- On 12 September 2025, the mayor of Capaclia v., Cantemir d., Galina Rotaru participated in the electoral meeting of CUB candidates Igor Munteanu, Rodica Gramma, and Eugen Surdu with local citizens.
- On 12 September 2025, the mayor of Bratuleni v., Nisporeni d., participated in the electoral meeting of the PAS candidate Vasile Porţevschi with voters from Bratuleni village. The event was organized in the gymnasium at 14.00, and all teachers were called by the mayor.
- On 14 September 2025, the mayor of Coteala v., Briceni d., posted a video on TikTok promoting PAS, talking about the local infrastructure projects implemented on public money. She mentioned that the projects for the development of the village are due to the support of the “PAS government”, so she urged voters to vote for PAS.
- On 15 September 2025, the mayor of Ialoveni Sergiu Armaşu and Ialoveni district president Natalia Eremia attended the electoral meeting of PAS candidates Ilie Ionaş and Marcela Adam with the employees of the Ialoveni Housing and Communal Services, where they also communicated about the achievements of the PAS government. For the president of Ialoveni d., there is an order on www.actelocale.gov.md of 12 September 2025 granting annual leave, but the period is blurred, so her status in the electoral campaign is not clear to observers.
- On 15 September 2025, the mayor of Drepcauti v., Briceni d., posted a video on her Facebook page urging citizens to vote for PAS in elections. The mayor described all the projects implemented in the locality financed under the European Village program on public money, highlighting the merit of PAS.
- On 16 September 2025, at the Maria Biesu Art School in Stefan Voda, the district president Olga Luchian participated in the electoral meeting of PAS candidate Ersilia Qatrawi with employees of the Stefan Voda branch of the Post of Moldova public company. According to the information obtained by the observer, employees were invited to the event under the guise of a working meeting.
- On 16 September 2025, the mayor of Ialoveni, Sergiu Armaşu, attended the electoral meeting of PAS candidate Liliana Nicolăescu-Onofrei with the employees and teachers of Petre Stefanuca Lyceum during their working hours.
- On 17 September 2025, the mayor of Maximovca v., Anenii Noi d., Maria Cernovschi attended the electoral meetings of the Patriotic EB candidates Diana Caraman and Alexandr Maşarin with the residents of Maximovca v., including in the meeting room of the town hall.
- On 17 September 2025, in the town hall of Chirca v., Anenii Noi d., a meeting with the Patriotic EB candidates Igor Dodon and Alexandr Maşarin took place with the participation of mayor Ana Dănuţa.
- On 17 September 2025, observers noted the participation of the mayor of Zimbreni v., Ialoveni d., Daniel Ţonu in the distribution of electoral activism materials of LOC on the territory of the locality.
- On 17 September 2025, the mayor of Satul Nou, Cimislia d., Marin Bumbu participated during his working hours in the electoral meeting of PAS candidate Andrian Talmaci with the teachers of the local gymnasium, during their working hours.
- On 17 September 2025, the mayor of Sagaidac v., Cimislia d., Ion Cojocaru attended the electoral meeting of PAS candidate Andrian Talmaci in the local gymnasium, including with the teachers, during their working hours.
- On 17 September 2025, the mayor of Gradiste v., Cimislia d., Nina Nistreanu attended the electoral meeting of PAS candidate Andrian Talmaci with the employees of the local gymnasium, during their working hours.
- On 17 September 2025, in the kindergarten of Baraboi v., Donduseni d., mayor Andrei Ţurcan participated in the electoral meeting of PAS candidate Alexandru Bordeiniî with the employees of the kindergarten, during their working hours.
- On 17 September 2025, the mayor of Porumbrei v., Cimislia d., Iurie Făureanu attended the electoral meeting of PAS candidate Andrian Talmaci in the local kindergarten. The director of the Porumbrei Gymnasium Lilia Amanu was also present at the meeting. The meeting was held during working hours.
- On 17 September 2025, the mayor of Seliste commune, Orhei d., Tudor Raevschi participated in the electoral meeting of PAS candidates Victoria Belous and Maxim Potîrniche with Lucaseuca village residents.

- On 18 September 2025, the mayor of Danceni v., Ialoveni d., Victoria Butuc-Guranda participated in the electoral meeting of PAS candidate Marcela Adam with the employees of the local gymnasium, during their working hours.
- On 18 September 2025, in the PAS tent installed near the central square of Cimislia, Mariana Plaxivii, deputy head of the Hincesti Territorial Office of the State Chancellery, and Nicolae Hristov, director of South RDA, were handing out newspapers.
- On 18 September 2025, the mayor of Gura Camencii v. Vadim Țugui attended the electoral meeting of PAS candidate Larisa Novac with the employees of local kindergartens, during their working hours.
- On 18 September 2025, Mariana Plaxivii, deputy head of the Hincesti Territorial Office of the State Chancellery, participated in the electoral meeting of PAS candidate Andrian Talmaci in the gymnasium of Hirtop v., Cimislia d., with the teachers of the institution, during working hours.
- On 18 September 2025, the mayor of Ialoveni Sergiu Armașu participated in the electoral meeting of PAS representative Petru Frunze and other members of PAS TO in Ialoveni with the employees of the Regina Maria kindergarten in Ialoveni, during their working hours.
- On 18 September 2025, Mariana Plaxivii, deputy head of the Hincesti Territorial Office of the State Chancellery, participated in the electoral meeting of PAS candidate Andrian Talmaci with the employees of the Hyperion Lyceum and the kindergarten during their working hours.
- On 19 September 2025, the mayor of Lunga v., Floresti d., participated in the electoral meeting held by PAS candidate Larisa Novac with the employees of the library, kindergarten, and primary school in the village, during their working hours.
- On 19 September 2025, the head of the consultative ward of Orhei District Hospital Oleg Boldișor invited the staff of the ward to the meeting at 12 o'clock, during working hours. Meanwhile, PAS candidates Maxim Potîrniche and Victor Matragună attended the meeting and engaged in electoral activism. Oleg Boldișor supported and promoted PAS during the meeting.
- On 19 September 2025, at the Mihai Eminescu Lyceum in Cimislia, the "operative" meeting organized by the director of the lyceum was attended by PAS candidate Andrian Talmaci and the mayor of Cimislia Sergiu Andronache, who urged teachers to vote for PAS. Some teachers expressed outrage that this "meeting" was not announced. The mayor of Cimislia engaged in activism during working hours.

Conduct of electoral meetings with public sector employees during their working hours

- On 11 September 2025, Ghenadi Mitriuc, Patriotic EB candidate, held an electoral meeting with the employees of „Apă-Canal Ungheni” S.R.L. during their working hours.
- On 11 September 2025, Patriotic EB candidates Igor Dodon and Vadim Groza (suspended mayor of Soldanesti) held an electoral meeting with the employees of the music school in Soldanesti during their working hours.
- On 11 September 2025, Sergiu Melnic, president of PAS TO in Soldanesti, together with PAS candidate Radu Marian, held an electoral meeting with the employees of the Soldanesti Forest Range in Dumbrava camp, during their working hours.
- On 11 September 2025, PAS candidate Mihai Popșoi held electoral meetings in Dubasarii Vechi v., Criuleni d., with the teachers of the local school and kindergarten.
- On 11 September 2025, PAS candidate Larisa Novac held an electoral meeting with the teachers of the gymnasium in Ciutullesti v., Floresti d., during working hours.
- On 11 September 2025, PAS candidates Ilie Ionaș and Aliona Castraveț had a meeting with the employees of the music school in Costesti v., Ialoveni d., during working hours.
- On 11 September 2025, PAS candidate Petru Frunze together with the mayor of Tipala commune Silviu Bivol had a meeting with medical workers from Tipala.
- On 12 September 2025, the Alternative EB organized electoral meetings with the employees of Emilian Cotaga Children's Hospital, Chisinau, during working hours.
- On 12 September 2025, the Alternative EB organized electoral meetings with employees of the Republican Experimental Center for Prosthetics, Orthopedics and Rehabilitation and the Valentin Ignatenco Children's Hospital, during working hours.
- On 12 September 2025, the Alternative EB organized electoral meetings with the employees of the Timofei Mosneaga Republican Clinical Hospital, during their working hours.
- On 12 September 2025, PAS candidate Artur Mija and PAS MP Vitalie Jacot engaged in electoral activism in the festive hall of the Alexandru cel Bun Lyceum in Rezina, despite the fact that the LPA order no. 234 of 19 August 2025 prohibited the organization of electoral meetings on the premises of schools and kindergartens.
- On 12 September 2025, Maxim Potîrniche, PAS candidate, held a meeting with the employees of the kindergarten from Mitoc v., Orhei d., during their working hours.
- On 12 September 2025, PAS carried out electoral activism activities in two early education institutions in Chisinau, Buiucani sector, during working hours.

- On 12 September 2025, PAS candidates Ilie Ionaș and Marcela Adam had a meeting with the employees of kindergartens no. 3 and no. 5 in Costesti v., Ialoveni d., during working hours.
- On 15 September 2025, PAS candidate Aliona Castraveț had a meeting with Molesti school employees during their working hours. The president of the district Natalia Eremia was also present at the meeting.
- On 15 September 2025, PAS candidates Roman Rosca and Gurii Isac held in Dorotcaia v., Dubasari d., an electoral meeting, including with school and kindergarten employees, during their working hours.
- On 16 September 2025, PAS candidate Ilie Ionaș had a meeting with the employees of the Little Red Riding Hood kindergarten in Costesti, Ialoveni d., during working hours.
- On 16 September 2025, PAS candidates Aliona Castraveț and Ludmila Catlabuga, together with the members of PAS TO in Ialoveni, had a meeting with the employees of the kindergarten in Milestii Mici, during working hours.
- On 16 September 2025, PAS candidate Alexandru Bordeinîi had an electoral meeting with the employees of the Donduseni Forest Range, during their working hours.
- On 16 September 2025, PAS candidates Aliona Castraveț and Ludmila Catlabuga, together with the members of PAS TO in Ialoveni, had a meeting with the employees of the kindergarten in Piatra Alba v., during working hours.
- On 16 September 2025, PAS candidate Andrian Talmaci met with the employees of the gymnasium in Batir v., Cimislia d., during working hours.
- On 16 September 2025, PAS candidates Larisa Novac and Marcel Spatari had an electoral meeting with gymnasium employees in Ghindesti v., Floresti d., during working hours.
- On 16 September 2025, PAS candidates Larisa Novac and Marcel Spatari had an electoral meeting with gymnasium employees in Radulenii Vechi v., Floresti d., during working hours.
- On 17 September 2025, Patriotic EB candidates Igor Dodon and Alexandru Mațarin met with the employees of the Center of Family Doctors in Anenii Noi, during working hours.
- On 17 September 2025, PAS candidates Ersilia Qatrawi and Marcel Spatari held an electoral meeting in the hospital of Stefan Voda, attended by medical workers, during working hours.
- On 17 September 2025, PAS candidates Ersilia Qatrawi and Marcel Spatari held an electoral meeting with teachers in Stefan Voda, during their working hours.
- On 17 September 2025, PAS candidates Aliona Castraveț and Ana Calinici had a meeting with the employees of the kindergarten in Bardar v., Ialoveni d., during their working hours.
- On 17 September 2025, PAS candidate Emil Cebanu had an electoral meeting with the employees of the Balti Municipal Family Doctors Center, during working hours.
- On 17 September 2025, PAS candidates Ilie Ionaș and Aliona Castraveț had a meeting with the employees of the Andries kindergarten in Ialoveni, during working hours.
- On 18 September 2025, PAS candidate Maxim Potîrniche held an electoral meeting with the employees of the Orhei District Sports School, during working hours.
- On 18 September 2025, Alternative EB candidate Ion Chicu, together with the leader of MAN TO in Orhei Pavel Ianeț and four other activists, held an electoral meeting with the employees of kindergartens Albinuta and Mugurasii in Peresecina v., Orhei d., during working hours.
- On 18 September 2025, Patriotic EB candidates Grigore Novac and Ghenadi Mitriuc had an electoral meeting with the employees of the kindergarten in Pirlita v., Ungheni d., during working hours.
- On 18 September 2025, PNM representative Ion Botnari, mayor of Chiperceni (according to observers, he was on leave on that date) held a meeting with the employees of Orhei District Sports School, during their working hours.
- On 18 September 2025, PAS candidate Marcela Adam had a meeting with the employees of the kindergarten in Danceni v., Ialoveni d., during working hours.
- On 18 September 2025, PAS candidates Ilie Ionaș and Marcela Adam had a meeting with the employees of the kindergarten in Costesti v., Ialoveni d., during working hours.
- On 19 September 2025, PAS candidate Andrian Cheptonar had an electoral meeting with teachers, employees, and students from the Medical College in Ungheni, during working hours. The meeting was attended by Elvira Stati, director of Ungheni District Hospital.
- On 19 September 2025, PAS candidate Roman Roșca held an electoral meeting with school teachers in Molovata Noua commune (Roghi v.) and Corjova, Dubasari district.
- On 19 September 2025, Patriotic EB candidates Pavel Voicu and Serghei Gramma held an electoral meeting with employees of the municipal company “Landscaping and Green Spaces Balti”, during working hours.