



# **REPORT no. 5**

## **Observation Mission**

### **General Local Elections and New Parliamentary Elections of 20 October 2019**

## **ELECTION DAY**

Published on 23 October 2019

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*The responsibility for the opinions expressed in this report lies with the Promo-LEX Association and does not necessarily reflect the position of the donors.*

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## EXECUTIVE SUMMARY

**Opening and closing of polling stations (PS).** All PSs monitored by observers were declared open. A polling station was opened with about 45-minute delay. About 57% of the PSs have been rated by observers as accessible. Only 24% of the PSs have been ensured with heating on the election day.

All the polling stations subjected to monitoring closed regularly, without significant deviations. About 26% of the PEBs ignored the rule that stipulates that one member of the bureau is to display the ballots to all the participants in the counting process. In about 5% of PSs, video cameras did not record the process of ballot counting.

**Incidents found on the election day.** The final processing of the information reported by the STOs delegated to the PSs and the LTOs working in mobile teams resulted in the analysis of 407 incidents.

The Promo-LEX OM draws the reader's attention to at least two cases of intimidation and seven cases of obstruction of observers' activity. Also, in at least nine PSs (1%) and two DEC, observers of the Mission encountered difficulties in obtaining the protocols of vote counting. We qualify these deviations from the legal norm as incidents that affect the legitimacy of elections and transparency of the vote counting process, which consequently undermine the public confidence in the elections and their results.

In quantitative terms, the most frequently reported incidents were: deficiencies in voters' lists (61), unjustified presence of unauthorized persons in the PS and in the precinct of the PS (46); presence of advertising materials, posters, electoral displays within 100 m of the PS (38); interrupted filming during the opening of the PS and vote counting process (34).

The Promo-LEX OM also warns about incidents related to: electoral campaigning on the election day (25) and rumors, attempts or even cases of material or monetary rewards offered to voters (8).

**Final results of the Promo-LEX vote counting.** The Promo-LEX OM analyzed the correctness of completing 755 vote counting protocols in mayoral elections in the 757 PSs observed, in two cases, it was impossible to obtain the protocols from electoral bodies. The OM identified 24 protocols filled out with 52 errors identified based on verification formulas. We emphasize the large number of protocols with errors in the formula  $H = G1 + G2 + G3 + G4 + Gn$ .

The results of parallel vote counting in the mayoral elections held in the municipality of Balti, Chisinau and Comrat did not reveal major differences between the preliminary data offered by the CEC and the final data of Promo-LEX.

## INTRODUCTION

Report no. 5 has been developed within the framework of the Promo-LEX Observation Mission (OM) of the general local and parliamentary elections of October 20, 2019 and includes the main findings and trends in the incidents reported on the Election Day, as well as the analysis of the parallel vote counting made by the Promo-LEX OM.

The report has been prepared based on the findings reported by short-term observers (STOs) delegated to 794 polling stations. Of these, 757 polling stations (out of the total of 1969) - opened for the local elections (including PSs in the single member constituencies (SMC) no. 17 and 33, where new parliamentary elections were held), as well as in 37 PSs in the SMC, no. 48 (25 out of 25) and 50 (12 out of 85), where only new parliamentary elections were held. Additionally, the processes held on the Election Day were observed by 41 mobile teams of the Promo-LEX OM. The PSs for the general local elections were selected by the Promo-LEX OM on the basis of a representative sample, established by a sociological company.

All the observers involved in the monitoring process are trained in the seminars organized by the Promo-LEX Mission and sign the Code of Conduct<sup>1</sup> of the Promo-LEX Independent National Observatory, committing to act in good faith and in a non-partisan way. The activity of all observers is coordinated by the central team of the Association.

The report is drawn up based on the findings of the STOs reported on the basis of two thematic formulations were used as the source for drawing up the MO observation report for the election day: a periodic reporting form and an incident reporting form.

The Promo-LEX OM for the general local elections and the new parliamentary elections of 20 October 2019 is a project carried out by the Promo-LEX Association within the Civic Coalition for Free and Fair Elections. The Promo-LEX OM is not a political opponent of the competitors involved in the electoral process, it is not an investigative body and does not assume the express obligation to prove the observed findings. However, observers' reports are accompanied, as far as possible, by photographic and video evidence, which can only be made available to law enforcement bodies, on the basis of appropriate requests, and in no case, shall it be provided to electoral competitors. At the same time, the violations, including the alleged ones, which are found in this report, must be treated by the electoral authorities in the light of the provisions of art. 22, para. (1), letter q) and art. 68, para. (5) Electoral Code, including as notifications filed by observers and be examined by the competent authorities.

The international standards referred to in this report are those developed by the UN, OSCE, the European Commission for Democracy through Law, the European Union and the Council of Europe. At the end of this report, we formulated preliminary recommendations for public authorities, electoral bodies, electoral candidates / participants in the referendums and other stakeholders to ensure the optimization of the electoral process.

The report is prepared as part of the Observation Mission for the general local and new parliamentary elections of October 20, 2019 carried out by the Promo-LEX Association with the financial support of the United States Agency for International Development (USAID) through the "Democracy, Transparency and Accountability" Program.

The opinions expressed in the public reports and press releases of the Promo-LEX MO belong to the authors and do not necessarily reflect the views of the financiers. The content of this document may be subject to editorial review.

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<sup>1</sup> <https://promolex.md/4689-codul-de-conduita-al-observatorilor-electorali-promo-lex/>

## I. OPENING AND CLOSING OF POLLING STATIONS

According to art. 55 of the Electoral Code, on the election day, the voting shall take place from 7:00 am to 9:00 pm.

All the PSs monitored by observers were declared open. A polling station was opened with about 45-minute delay. About 57% of the PSs have been rated as accessible by the observers. Only 24% of the PSs have been ensured with heating on the election day. All the polling stations subjected to monitoring closed regularly, without significant deviations. About 26% of the PEBs ignored the rule that stipulates that one member of the bureau is to display the ballots to all the participants in the counting process. In about 5% of PSs, video cameras did not record the process of ballot counting.

Promo-LEX observers monitored the general local and new parliamentary elections in 794 PSs. At the same time, the number of findings per category may differ depending on the number of validated SMS received by the central team<sup>2</sup>.

### 1.1. The opening of the PSs

All polling stations observed were declared open. At the same time, according to observers, the PS 1/148 Chisinau opened with a delay of about 45 minutes.

Table no. 1. Opening of polling stations (based on 781 PSs)

| Period               | Between 6:50 - 6:59 | At 7:00     | Between 7:01 - 7:14 | After 7.15 |
|----------------------|---------------------|-------------|---------------------|------------|
| Number of PSs opened | 48 (6%)             | 676 (86.5%) | 53 (7%)             | 4 (0.5%)   |

### 1.2. Accessibility of PSs

| Category   | YES       | NO        | Total PS |
|--|-----------|-----------|----------|
| Is the polling station accessible to people with locomotor difficulties?     | 453 (57%) | 338 (43%) | 791      |
| Is the polling station ensured with heating?                                 | 191 (24%) | 600 (76%) | 791      |
| Is the polling station illuminated enough to carry out electoral procedures? | 772 (98%) | 14 (2%)   | 786      |

### 1.3. The closure of PSs

Table no. 2. Procedures for closing the PS and counting of votes

| Category  | YES       | NO        | Total PS |
|---|-----------|-----------|----------|
| Did the polling station close at 9 pm?  | 786 (99%) | 5 (1%)    | 791      |
| Were special forms for vote counting results initially drafted?   | 775 (99%) | 11 (1%)   | 786      |
| Did only one PEB member show the ballots to all participants in the vote counting process?                                    | 581 (74%) | 205 (26%) | 786      |
| Did the video camera record the entire process of unsealing the ballot boxes and counting the ballots, without interruptions? | 748 (95%) | 38 (5%)   | 786      |

According to the observers, the delays were insignificant (up to 15 minutes).

<sup>2</sup> The results of observations on the election day were transmitted by short-term observers to the central team based on text messages.

## II. INCIDENTS FOUND ON ELECTION DAY

The final processing of the information reported by the STOs delegated to the PSs and the LTOs working in mobile teams resulted in the analysis of 407 incidents.

The Promo-LEX OM draws the reader's attention to at least two cases of intimidation and seven cases of obstruction of observers' activity. Also, in at least nine PSs (1%) and two DECs, observers of the Mission encountered difficulties in obtaining the protocols of vote counting. We qualify these deviations from the legal norm as incidents that affect the legitimacy of elections and transparency of the vote counting process, which consequently undermine the public's confidence in the elections and their results.

In quantitative terms, the most frequently reported incidents were: deficiencies in voters' lists (61), unjustified presence of unauthorized persons in the PS and in the precinct of the PS (46); presence of advertising materials, posters, electoral displays within 100 m of the PS (38); interrupted filming during the opening of the PS and vote counting process (34).

The Promo-LEX OM also warns about incidents related to: electoral campaigning on the Election Day (25) and rumors, attempts or even cases of material or monetary rewards offered to voters (8).

### 2.1. Intimidated/ obstructed activity of Promo-LEX observers

According to art. 68 para. (5) of the Electoral Code, observers accredited by the CEC may monitor the electoral process throughout the country and in all polling stations, while observers accredited by the DEC – may do it only within the respective constituency. Accredited observers have the right to attend all the electoral operations, all the meetings of electoral bodies, including on the day of elections, without intervening in the electoral process or in other electoral operations and to inform the president of electoral body about the irregularities observed.

According to the reports presented by the Promo-LEX observers, there were at least **9 cases**, in which observers' activity in the polling stations was intimidated or obstructed.

| Intimidation of Promo-LEX observers         |  |
|---|--|
| 2 cases                                     | DEC, no. 29, Soroca.<br>PS 15/01.  |
| Obstruction of the free observation process |  |
| 7 cases                                     | Refusal to provide information on the participation rate (2 cases): PS 1/269, PS 1 / 33.<br>Prevention of free election observation (1 case): PS 1/17.<br>Verbal aggression of Promo-LEX observers by PEB officials (4 cases): PS 2/44; PS 18/13; PS 18/13 and PS 18/67. |

### 2.2. Refusal / difficulties in obtaining copies of protocols in the polling stations and in the district electoral councils

According to art. 63 para. (4) of the Electoral Code "The protocol on vote counting results is drawn up in several copies, in the presence of members of the precinct electoral bureau (PEB), representatives of electoral competitors and other authorized persons. A copy of the protocol shall be kept by the PEB, a copy shall be submitted to the district electoral council (DEC), one copy shall be displayed at the entrance to the polling station, the other copies **shall be handed over to representatives of electoral competitors and observers.**"

Contrary to the legal provisions mentioned above, in the **case of 9 PSs**, Promo-LEX observers were either refused or had difficulties in receiving protocols on vote counting results. **This phenomenon seriously affects the integrity and transparency of the process of counting and totalizing the voting results.** The large number of refusals points to a systemic problem in electoral bodies' approach to the observers' role and the transparency of counting and totalizing procedures.

| Providing protocols containing the voting results only for the councilors' office / only for the mayors' office |  |
|---|--|
| <b>4 cases</b>  | PS 16/027; PS 1/253; PS 1/228; PS 1/168. |
| Observers were required to fill out the protocols on election results by themselves                             |  |
| <b>3 cases</b>  | PS 1/261; PS 1/226 and PS 1/287.         |
| Presidents of PEBs refused to provide protocols to Promo-LEX observers at the time of request                   |  |
| <b>2 cases</b>  | PS 36/05 and PS 22/15.                   |

In addition, the receipt of the protocols from PEBs was doubled by photographing copies received by the district electoral councils. In this respect, in the case of **2 DECs** - Cantemir and Hincesti - Promo-LEX observers were given partial access to electoral documentation, only certain protocols selected by the DECs were provided to them.

### **2.3. Ballot boxes were not secured in compliance with the legal procedures / broken / damaged or complete absence of seals on ballot boxes**

*According to art. 60 para. (1) of the Electoral Code, on the election day, at 07.00, the president of PEB, in the presence of at least half of the members of the bureau, shall check the ballot boxes and seal them. According to points 26 and 27 of the CEC Instruction on ensuring of the PS infrastructure, ballot boxes shall be secured by sealing. The stationary ballot boxes are secured by means of 4 self-locking collar type seals, and the mobile ballot boxes, by means of 1 (one) seal.*

The observers of the Promo-LEX OM identified **11 cases** of non-observance of legal procedures for securing ballot boxes, namely:

| Ballot boxes were not secured in compliance with the legal procedures |          |                       |
|---|----------|-----------------------|
| DEC   | Nr. case | PS                    |
| <b>1 Chisinau</b>   | 5        | 10; 72; 77; 176; 260. |
| <b>4 Anenii Noi</b>   | 4        | 6; 2. 3; 26.          |
| <b>33 Taraclia</b>  | 1        | 26.                   |
| <b>32 Stefan Voda</b>   | 1        | 24.                   |

### **2.4. Presence of advertising materials, posters, electoral displays within the precinct (100 m from the PS)**

*According to art. 60 para. (7) of the Electoral Code, "On the election day, the responsibility for ensuring public order in the polling station and in the surrounding territory, within 100 meters from the polling station, is carried out by the president of the precinct electoral bureau." Decisions made in this respect are enforceable for all.*



Promo-LEX OM considers that the Regulation on the placement of electoral advertising and political promotion materials must be adjusted to the new provisions of the Electoral Code and return to the version that was in force before the parliamentary elections of February 24, 2019 when there were normative provisions expressly banning electoral displays within 100 m from the polling station.

Promo-LEX observers have identified at least **38 PSs** with advertising materials, posters, electoral displays within 100 m from the PS.

| <b>Presence of advertising materials, posters, electoral displays in the precinct (within 100 m of the PS)</b> |                  |   |
|--|------------------|---|
| <i>Electoral competitor</i>  | <i>Nr. cases</i> | <i>Polling stations</i>   |
| <b>PSRM</b>  | <b>15</b>        | 18/67; 1/249; 1/262; 7/18; 7/43; 1/110; 1/265; 31/1; 13/6; 20/4; 20/3; 20/14; 14/04; 20/14; 13/10 |
| <b>PDM</b>   | <b>7</b>         | 1/289; 13/3; 12/5; 13/1; 7/52; 20/3; 20/14  |
| <b>ACUM Bloc</b>   | <b>3</b>         | 13/1; 23/16; 7/52   |
| <b>PL</b>  | <b>2</b>         | 1/308; 1/108  |
| <b>PDA</b>   | <b>2</b>         | 1/27; 1/282   |
| <b>PLDM</b>  | <b>2</b>         | 1/269; 1/297  |
| <b>PPS</b>   | <b>2</b>         | 14/29; 1/311  |
| <b>PCRM</b>  | <b>1</b>         | 14/29   |
| <b>PN</b>  | <b>1</b>         | 18/67   |
| <b>PPR</b>   | <b>1</b>         | 1/266   |
| <b>Constantin Cojocaru (IC)</b>  | <b>1</b>         | 16/1  |
| <b>Draguțan Sergiu (IC)</b>  | <b>1</b>         | 1/262   |
| <b>Igor Gustoi (IC)</b>  | <b>1</b>         | 18/5  |
| <b>Costiuc Nina (IC)</b>   | <b>1</b>         | 1/289   |
| <b>Peicov Piotr (IC)</b>   | <b>1</b>         | 33/7  |

## 2.5. Unjustified presence of unauthorized persons in the PS and within 100 m of the PS

According to art. 60 para. (8) of the Electoral Code, the activity of electoral bodies may be attended by: members / representatives of hierarchically superior electoral bodies; representatives of electoral competitors in electoral bodies; national / international observers accredited by the respective bodies, as well as their interpreters, as the case may be; representatives of mass media.

Promo-LEX observers found at least **46 cases**, where certain categories of unauthorized persons spent in the PSs a period of time greater than the limit allowed by the legal provisions.

| <b>Unjustified presence of unauthorized persons in the precinct of the polling station</b> |   |
|--|---|
| <i>Number of cases</i>   | <i>Polling stations</i>   |
| <b>30 cases</b>  | <p><b>Involving electoral competitors:</b><br/> <b>PDM (4 cases)</b> - 7/43; 11/26; 18/67; 25/07.<br/> <b>PPS (3 cases)</b> - 1/278<sup>3</sup>, PS 11/46.<br/> <b>ACUM (4 cases)</b> - 18/23; 28/27; 34/02; 34/03.<br/> <b>PSRM (11 cases)</b> - 1/111; 5/14; 5/15; 9/47; 11/46 (2 cases); 18/67; 19/7; 22/26; 27/50; 32/6.<br/> <b>PN (2 cases)</b> - 2/49; 5/14; 5/15.</p> |

<sup>3</sup> A candidate entered the polling station twice, without a valid reason.

|                 |   |
|-----------------|---|
|                 | <i>PCRM (2 cases)</i> - 12/20; 24/03.<br><i>USB (1 case)</i> - 18/22.<br><i>PLDM (2 cases)</i> - 34/02; 34/03.<br><i>Unidentified electoral competitor</i> - 1/111. |
| <b>4 cases</b>  | <b><i>Unjustified presence of police in the polling station:</i></b><br>11/37; 2/25 <sup>4</sup>  |
| <b>12 cases</b> | <b><i>Unjustified presence of some unidentified persons.</i></b><br>1/264; 1/278; 1/281; 2/58; 15/01; 15/24; 18/13; 25/07; 21/9; 26/02; 35/03 <sup>5</sup> .        |

## 2.6. Undistributed ballot papers are not kept in a safe place inside the PS

According to art. 60, para. (2) of the Electoral Code, ballot papers must be kept in a safe place inside the polling station, in packages of 100 pieces.

Promo-LEX observers reported only **2 cases** that can be qualified as acts compromising the security of the voting process. The cases were identified in PS 11/36 and PS 26/02.

## 2.7. Rumors, attempts or even cases of material or monetary rewards offered to voters

According to art. 41 para. (5) - (6) of the Electoral Code, electoral competitors are forbidden to offer voters money, distribute free material goods, including humanitarian aid, or carry out any other charitable actions, with the exception of offering symbolic gifts that represent electoral or political advertising and bear the symbol of the electoral competitor, whose market value does not exceed 2 conventional units, being paid from the "Electoral Fund" account.

Promo-LEX observers have identified **8 cases** of offering of material or monetary rewards to voters.

| <b>Rumors, attempts or even cases of material or monetary rewards offered to voters in the polling station and or near it</b> |   |
|---|---|
| <b>Number of cases</b>  | <b>Description</b>  |
| <b>8 cases</b>  | <b>Involving the PPS representatives (2 cases):</b><br>Both material rewards and money rewards (1 case): PS 25/81.<br>Rewards of unidentified content (1 case): PS 25/41.                         |
|   | <b>Involving the PSRM representatives (1 case)</b><br>Rewards of unidentified content: PS 18/35.  |
|   | <b>Involving Alexandru Plamadeala, IC (Valea Perjei, Cimişlia) (1 case)</b><br>Money rewards: PS 11/46 (200-400 lei).   |
|   | <b>Involving unidentified electoral competitors (4 cases):</b><br>Money rewards (1 case): PS 1/287 (about 1000 lei).<br>Rewards of unidentified content (3 cases) - PS 16/18; PS 26/39; PS 1/272; |

<sup>4</sup> A police employee (dressed in police uniform), periodically (at least 3 times) entered the polling station and watched the voting process, spending in the polling station from 5 to 10 minutes.

<sup>5</sup> Two unauthorized persons began filming the process inside the PS.

## 2.8. Electoral campaigning on the election day

According to the Electoral Code, art. 52 para. (10) no electoral campaigning is allowed on the election day and on the day preceding it. This prohibition does not refer to information already posted on the Internet and to posters previously displayed.

Promo-LEX observers have reported **25 cases** that can be qualified as acts of electoral campaigning to influence the voter's choice. Thus, the OM identified 4 cases of campaigning in favor of the PPS candidates, the PSRM candidates - 7 cases, the PN, PVP, PDM - one case each, the USB - 3 cases, in favor of independent candidates Sergiu Dragutan and Valeriu Poiata - one case each. In addition, there were 6 cases of electoral campaigning in favor of candidates, which could not be identified.

| Electoral campaigning or adverse campaigning to influence the voters' choice |  |          |
|--|--|----------|
| In favor of  | Polling stations   | No cases |
| PPS  | PS 2/48; PS 1/91; PS 25/13; PS 28/7.   | 4        |
| PDM  | PS 11/17.  | 1        |
| PSRM   | PS 1/185; PS 1/221; PS 1/269; PS 1/273; PS 36/46; PS 1/278; PS 36/1.               | 7        |
| PN   | PS 2/51  | 1        |
| USB  | PS 1/269; PS 1/122; PS 9/29.   | 3        |
| PVP  | PS 1/269   | 1        |
| Independent candidates   | Sergiu Dragutan (Durlesti) PS 1/262; Valeriu Poiata (Singera) PS 1/269 - 2 cases). | 2        |
| Unidentified candidates  | PS 1/168; PS 1/278; PS 1/299; PS 32/6; PS 16/18; PS 18/9.                          | 6        |

## 2.9. Organized transportation of voters (coaches, minibuses or other means of transportation that normally would not be around the PS)

Despite the fact that organized transportation of voters is not foreseen as a violation of the Electoral Code, the Promo-LEX OM has monitored these situations, considering them actions with the potential to bribe voters and influence the voting results.

Promo-LEX observers identified at least **13 cases**, where there were situations that can be interpreted as organized transportation of voters.

| Organized transportation of voters<br>(coaches, minibuses or other means of transportation that normally would not be around the PS) |           |                             |   |
|--|-----------|-----------------------------|---|
| DEC  | No. cases | PS                          | Means of transportation involved  |
| 1 Chisinau   | 2         | PS 272, PS 283.             | Niva, reg. no. CPL-7096 (about 2-3 trips); minibus (Mercedes) white, reg. no. KWK-091                       |
| 2 Balti  | 1         | PS 1.                       | 1 T5 minibus, reg. no. GME 694  |
| 13 Donduseni   | 1         | PS 13.                      | -   |
| 15 Dubasari  | 1         | PS 1.                       | 2 minibuses.  |
| 21 Ialoveni  | 1         | PS 6.                       | Range Rover, reg. no. AAP 986 (5 trips)   |
| 32 Stefan Voda   | 2         | PS 6; PS 24.                | 1 minibus Vito (cargo), reg. no. PS AL 263 and Dacia Logan, white, reg. no. OOT329; Audi, reg. no. BC950KN. |
| 36 ATUG  | 1         | PS 48.                      | 1 white minibus.  |
| 48 Causeni   | 4         | PS 11; PS 12; PS 19; PS 20. | 2 (white) minibuses from Bender.  |

## 2.10. Unjustified termination / suspension of voting in the polling station

Art. 56 para. (1) of the Electoral Code stipulates that in the time reserved for voting, it is forbidden to close the polling station and to suspend the voting, except for cases of mass disorder, natural disasters, other unforeseen circumstances, which put voters in danger or make the voting impossible.

Promo-LEX MO observers identified **3 PSs**, in which the voting process was unreasonably suspended for short periods of time.

| Unjustified suspension of voting |  |
|----------------------------------|--|
| Number of PS                     | Description  |
| <b>3 PS</b>                      | <b>Due to power failure:</b><br>PS 9/14; PS 26/37; PS 28/29.     |
| <b>1 PS</b>                      | <b>Due to the failure of SIAS Elections system:</b><br>PS 11/22. |

## 2.11. Acts of violence or intimidation of voters or other persons

According to art. 60, para. 7) and 9) of the Electoral Code, on the election day, the security of the voting process and public order in the polling station and within 100 meters from the polling station, shall be ensured by the president of the precinct electoral bureau. The decisions made in this respect are enforceable for all. The law enforcement representatives may enter the PS only if they are invited by the PEB president to help restore public order.

Promo-LEX observers have reported at least **16 cases** that can be described as acts of violence or intimidation of voters, PEB members, observers or other persons. The reasons deduced by the observers are: conflicting voters - **6 cases**, the PSRM observers and supporters - **4 cases**, insult of PEB members - **3 cases**, drunk voters, a PVP observer, an unauthorized person (because of identity documents) - **1 case each**.

| Acts of violence or intimidation (perpetrators) |           |   |
|---|-----------|---|
| Persons causing the incident                    | Nr. cases | PS  |
| Voters, including intoxicated                   | 1         | PS 18/9   |
| Insults against PEB members                     | 3         | PS 1/141; PS 1/260; PS 18/9.                              |
| Unauthorized persons                            | 1         | PS 2/55   |
| PSRM representative / observer                  | 4         | PS 1/54; PS 11/46; PS 2/2; PS 1/13.                       |
| PVP representative / observer                   | 1         | PS 1/273  |
| Voters  | 6         | PS 1/296; PS 1/132; PS 1/219; PS 1/187; PS 1/31; PS 1/69. |

## 2.12. Deficiencies in the operation of SIAS Elections system

Point 61 of the Regulation on the activity of the PEB establishes that a member of the bureau shall hand a ballot to the voter, only after the voter has been verified by the SIAS Elections system operator and it has been found that the voter meets all the conditions for the voter's participation in the respective polling station.

Promo-LEX observers found **23 situations**, where SIAS Elections system had either technical (cessation of operation, loss of Internet connection) or content deficiencies (inconsistencies between the data in voter's identity documents with those specified in the SIAS Elections system).

| Deficiencies in the operation of SIAS Elections system |   |
|--|---|
| Technical deficiencies (5 cases)                       | Content deficiencies (18 cases)   |
| PS 26/39; 2/30; 1/88; 1/169; 1/256.                    | PS 1/154; 1/149; 1/184; 2/54; 1/148; 1/67; 18/47; 1/30; 1/31; 21/39; 14/4; 1/140; 26/2; 1/261; 1/275; 2/21; 1/12; 1/56. |

### 2.13. Deficiencies in the voters' lists

*Voters' lists, drawn up on the basis of the State Registry of Voters, are lists comprising all voting citizens who have their domicile or residence within the territory of a polling station. The voter can only be registered in a single voters' list and in a single polling station.*

According to Promo-LEX observers, deficiencies in the voters' lists remain the most reported incident. This finding is valid from a comparative perspective with the previous polls.

Altogether, there were reported at least **61 problematic cases**, as follows: *deceased persons on the lists (8 cases); non-inclusion of voters on the main list although according to their identity documents, they are to be assigned to the respective PS (30 cases); foreign persons or former owners registered at the voters' addresses (8 cases); errors in addresses / personal data / others - (15 cases).*

| Deficiencies in the voters' lists  |  |   |   |
|--|--|---|---|
| Non-inclusion on the main voters' lists (30)   | Errors in address / personal data / others (15)  | Foreign persons or former owners registered at voter's home address (8) | Deceased persons on the list (8)                      |
| PS1 / 142; 1/192; 1/14; 1/79; 18/65; 18/4; 1/260; 18/5; 2/28 (2); 1/222 (2); 1/246; 1/79; 1/154; 1/23; 1/269; 1/47; 1/192 (2); 2/27; 1/258; 2/29; 1/232; 1/275; 1/185; 1/103; 2/42; 1/13; 1/283. | PS 1/298; 1/56; 1/30; 1/131; 9/47; 1/56; 1/74; 1/139; 1/136; 7/7; 2/54; 2/50; 2/27; 9/15; 1/192. | PS 1/151; 18/58; 1/39; 1/136; 1/131; 18/1; 1/137 (2).                   | PS 23/4; 1/88; 1/222; 1/1; 1/217; 1/213; 26/37; 1/44. |

### 2.14. Interruption of the filming process during the preparation of the PS for opening, vote counting and other incidents

*According to point 11 of the Regulation on the operation of the Video Recording System in the PS, the video recording system shall be functional and active only on the day of voting to monitor electoral operations during the opening of the polling station, closing of the polling station, the procedures of counting and totalizing the votes.*

According to the reports presented by Promo-LEX observers, there were **34 cases** with incidents related to the shooting of voting procedures.

| <b>Interruption of the filming process during the preparation of the PS for opening, vote counting and other incidents</b> |   |
|--|---|
| <b>No. cases</b>   | <b>Polling stations</b>   |
| <b>8</b>   | <b>During the opening of the polling station:</b><br>- Video recording camera did not function (6 cases) - 7/4; 7/45, 16/1; 27/50; 28/35; 34/31;<br>- Lack of storage space (1 case) - 28/35;<br>- Interruption of the filming process (1 case) - 23/32;  |
| <b>25</b>  | <b>During the closure of the polling station and the process of vote counting:</b><br>- Video recording camera did not function (11 cases) - 1/249; 2/49; 7/4; 8/3; 16/1; 16/33; 21/22; 25/64; 27/43; 27/50; 36/4;<br>- Interruption of the video recording process or failure to record certain procedures (7 cases) - 1/22; 1/30; 1/74; 1/91; 24/11; 25/47; 27/15;<br>- Non-use of video recording camera (partial or complete) (2 cases) - 1/167; 1/289;<br>- Exhaustion of the autonomous power supply (3 cases) - 1/59; 1/222; 1/298;<br>- Incorrect positioning of video camera (2 cases) - 1/196; 1/217; |
| <b>1</b>   | <b>Operation of video recording camera during the voting process (1 case): 16/33</b>  |

## 2.15. Photographing of ballot papers, other violations of the secrecy of voting

According to point 68 of the Regulation on the activity of the precinct electoral bureaus, it is forbidden to photograph the ballot that has been filled in. According to point 19 of the Instruction on ensuring the infrastructure of the PS, the booths for secret voting shall be placed in such a way that their uncovered part be oriented towards the remaining free wall of the PS, at a distance of no more than 1 m.

According to the reports presented by Promo-LEX observers, there were reported at least **26 cases** of photographing of ballot papers as well as breach of secrecy of voting, by incorrect positioning of the voting booth.

| <b>Photographing of ballot papers, other violations of the secrecy of voting</b> |  |
|--|--|
| <b>Number of cases</b>   | <b>Polling stations</b>  |
| <b>21 cases</b>  | <b>PEB members tried to solve the incident when the voters photographed the ballots, in the following PS: 1/56; 30/26; 1/241; 1/177; 36/6 (2); 2/57; 27/14; 1/62; 11/28; 4/20; 1/213; 1/132; 1/22; 23/04; 01/299; 4/25; 2/49; 2/59; 1/43; 1/150.</b> |
| <b>1 case</b>  | <b>PEB members did not try to solve the incident when the voters photographed the ballots, in the following PS: 2/43.</b>  |
| <b>4 cases</b>   | <b>In the following PSs, the positioning of voting booths did not provide for the secrecy of voting: 32/06; 1/22; 4/26; 1/119;</b>   |

## 2.16. Unjustified group voting (2 or more people in the voting booths)

Art. 5 and 6 of the Electoral Code stipulate the universal principles underlying democratic elections, namely **the direct and secret voting**, i.e. the voter shall vote personally and secretly, thus excluding the possibility of influencing his or her will. Voting in place of another person is prohibited. The voter who is unable to fill in the ballot individually has the right to invite another person, except for PEB members, representatives of electoral competitors / participants in the referendum or persons authorized to attend the electoral operations.

Promo-LEX observers reported at least **25 cases** that can be qualified as violation of direct and secret voting or unjustified group voting on the election day. The above cases do not include visually impaired voters. In most cases (13), PEB members avoided to involve in solving the problem.

| Unjustified group voting                      |   |   |
|---|---|---|
| Total number of cases - 25                    |   |   |
| PS in which PEB members got involved - 5      | PS in which PEB members did not react - 13  | Missing data - 8  |
| PS 15/1, PS 9/39, PS 1/165, PS 2/28, PS 1/59. | PS 1/194, PS 1/278, PS 1/287, PS 9/45, PS 1/103, PS 2/44, PS 1/47, PS 2/30, PS 1/154 (2), PS 9 / 40, PS 12/1. | PS 1/54, PS 25/12, PS 1/71, PS 2/7, PS 18/35, PS 1/177, PS 1/74, PS 15/9. |

## 2.17. Deterioration of ballots or other incidents that refer to their non-conforming use

According to art. 59 of the Electoral Code, the ballot shall be filled in by the voter only in the secret voting booth. The voter shall apply the stamp with the inscription "Voted" inside the circle of a single quadrangle in the ballot, which means that s/he has voted for the corresponding electoral competitor and s/he shall insert the "Voted" ballot into the ballot box. If the voter has incorrectly completed the ballot, at his/her request, the PEB shall cancel this ballot and immediately issue another one. It is forbidden to remove the ballot from the premises of the polling station.

According to point 42 let. a) of the Regulation on the activity of precinct electoral bureau, during its activity, members of the electoral bureau shall maintain and ensure the integrity of ballot papers;

According to the reports presented by Promo-LEX observers, a frequent phenomenon witnessed in this poll was the deterioration of ballot papers by breaking, removing the ballot papers from the PS and / or abandoning them in the voting booth. A total of **16 cases** were reported in this respect.

| Deterioration of ballots or other incidents related to their non-conforming use |   |
|---|---|
| Number of cases   | Description / PS  |
| 2 cases   | Deterioration of ballots: 25/03; 27/31.   |
| 4 cases   | Removal / attempts to remove the ballots: 1/110; 18/67; 1/43; 1/262.  |
| 10 cases  | Abandoning the ballots in the voting booth: 4/29; 16/11; 1/28; 1/197; 2/33; 1/17; 4/25; 23/04; 2/42; 1/302. |

## 2.18. Cancellation of ballots before the closure of polling stations

According to art. 61. para. (2) of the Electoral Code, before opening the ballot boxes for vote counting, PEB members shall count and cancel all the remaining unused ballot papers by applying the stamp "Canceled" on them.

Promo-LEX observers reported **6 cases** that could be qualified as cancellation of ballots before the closure of the polling stations. The cases refer to *PS 1/239, PS 1/17; PS 2/2; PS 2/3; PS 2/15; PS 25/52*. The reason invoked in all the cases was to speed up the process of vote counting.

### **2.19. Others**

Among the **34 incidents** included in this category (see the complete list in Annex 1), we specify: *deficiencies related to the use of accompanying sheet of the ID (6 PSs); deficiencies related to voting at the place of domicile, involving the mobile voting box (5 PSs); influencing the voter's choice (5 PSs) etc.*



### III. FINAL RESULTS OF PROMO-LEX VOTE COUNTING

The Promo-LEX OM analyzed the correctness of completing 755 vote counting protocols in mayoral elections in the 757 PSs observed, in two cases, it was impossible to obtain the protocols from electoral bodies. The OM identified 24 protocols filled out with 52 errors identified based on verification formulas. We emphasize the large number of protocols with errors in the formula  $H = G1 + G2 + G3 + G4 + Gn$ .

The results of parallel vote counting in the mayoral elections did not reveal major differences between the preliminary data offered by the CEC and the final data of Promo-LEX.

#### 3.1. Correctness of the preparation of protocols on vote counting results

Observing the general local elections of October 20, 2019, the Promo-LEX OM analyzed the correctness of completing 755 protocols on vote counting results in 757 PSs observed, the other two protocols being impossible to obtain from electoral bodies<sup>6</sup>. The Mission identified 24 protocols containing 52 errors, detected based on verification formulas (see Annex 2).

From a comparative perspective, the Promo-LEX OM points out that the share of erroneous protocols completed by the PEBs has decreased compared to the parliamentary elections of February 24, 2019.

Table 1. Dynamics of erroneous completion of protocols

| Election type                                   | Number of protocols with errors (identified based on verification formulas) |
|---|---|
| Presidential elections, 30.10.2016              | 31 (1.6%) <sup>7</sup>  |
| New local elections, 20.05.2018                 | 22 (5.87%) <sup>8</sup> / 6 (2%) <sup>9</sup>                               |
| Parliamentary elections, 24.02.2019             | 142 (6.8%) <sup>10</sup> / 160 (7.6%) <sup>11</sup>                         |
| General local elections, 20.10.2019 (1st round) | 24 (3.2%)   |

Types of errors are presented in Table 2. We draw the reader's attention to the share of protocols with errors in the formula  $H = G1 + G2 + G3 + G4 + Gn$ . It means that the sum of votes cast for competitors does not coincide with the total number of valid votes cast.

Table 2. Type and number of errors detected

| ERROR TYPE                  | NUMBER                        |
|-----------------------------|-------------------------------|
|                             | Protocol (for mayor's office) |
| D == F + H                  | 8                             |
| E == CD                     | 3                             |
| I == C + J                  | 8                             |
| H == G1 + G2 + G3 + G4 + Gn | 15                            |
| F == D-H                    | 8                             |
| J == I-C                    | 8                             |
| C > D                       | 2                             |

<sup>6</sup> PS 1/228 and 25/13.

<sup>7</sup> The data are for the second round of voting, total number of processed protocols - 1981.

<sup>8</sup> Round I of the new local elections of May 20, 2018, total number of processed protocols - 375.

<sup>9</sup> Round II of the new local elections of May 20, 2018, total number of processed protocols - 306.

<sup>10</sup> National constituency

<sup>11</sup> Single member constituency

Correctness of the protocols was verified based on the formulas inserted in the text of the protocol:  $d = f + h$ ;  $e = c - d$ ;  $i = c + j$ ;  $h = g_1 + g_2 + h = g_3 + g_4 + \dots + g_n$ ;  $f = d - h$ ;  $c \geq d$ ;  $j = i - c$ .

The formula  $d = f + h$  was not respected in 8 protocols. In these cases, they failed to show that the number of ballots taken from the ballot box coincides with the sum of invalid and valid ballots cast. Doubts may arise with regard to the correctness of counting of the votes validly cast, respectively of competitors' results.

The formula  $e = c - d$  was not respected in the case of 3 protocols. Thus, in 3 PSs, the number of signatures on voters' lists does not coincide with the number of ballots taken out of the ballot boxes.

The formula  $i = c + j$  could not be applied correctly in the case of 8 protocols. The same situation is attested in the case of the formula  $j = i - c$ . Thus, PEB members incorrectly counted either the number of unused and canceled ballots or the number of signatures in the voters' lists. Moreover, we found that the expression "unused and canceled" may be misleading to PEB members, as it may be associated with two distinct categories of ballots.

The formula  $h = g_1 + g_2 + g_3 + g_4 + \dots + g_n$  was not respected in 15 cases. We paid special attention to this formula: the separate sums of votes cast for competitors do not coincide with the total number of valid votes cast, which may provoke questions with regard to the correctness of the results for electoral competitors.

The formula  $f = d - h$  verifies the number of ballots declared invalid by subtracting them from the total number of ballots validly cast. Errors in applying this verification formula are reported in 8 protocols.

Formula  $c \geq d$  indicates that the number of voters who received the ballots (deducted on the basis of signatures in the voters' lists) must be equal to or greater than the number of ballots taken from the ballot box. The OM identified two protocols, in which this formula was not respected, a finding that would mean that the number of ballots extracted from the ballot box is greater than the number of ballots that had been given to voters by the electoral body.

### 3.2. Comparative analysis of the data on parallel vote counting carried out by the Promo-LEX OM and the preliminary data announced by the CEC

The final results, presented by the Promo-LEX OM, refer to the number of votes validly cast for the mayoral candidates in the municipalities of Chisinau<sup>12</sup>, Balti and Comrat. The final results were calculated based on the protocols received by the observers.

Table 3. Results of parallel vote counting

| DEC      | Candidate's name | Party | CEC, preliminary |        | Promo-LEX, preliminary |       | Promo-LEX, final |       | Difference CEC / Promo-LEX, final (%) |
|----------|------------------|-------|------------------|--------|------------------------|-------|------------------|-------|---------------------------------------|
|          |                  |       |                  |        |                        |       |                  |       |                                       |
| Chisinau | Ceban Ion        | PSRM  | 40.19%           | 90 591 | 39.96%                 | 87131 | 40.15%           | 90190 | 0.04%                                 |
|          | Cirnat Teodor    | PVP   | 0.85%            | 1908   | 1.25%                  | 2749  | 0.86%            | 1926  | -0.01%                                |
|          | Klimenco Valerii | PPS   | 3.04%            | 6859   | 3.16%                  | 6940  | 3.09%            | 6944  | -0.05%                                |
|          | Munteanu Valeriu | USB   | 0.76%            | 1710   | 0.79%                  | 1729  | 0.76%            | 1704  | 0                                     |
|          | Chironda Victor  | MSPFN | 2.73%            | 6147   | 2.75%                  | 5959  | 2.73%            | 6126  | 0                                     |
|          | Voznoi Vitalie   | PSE   | 0.16%            | 358    | 0.20%                  | 389   | 0.16%            | 355   | 0                                     |

<sup>12</sup> In the case of the municipality of Chisinau, the OM has not received a protocol from PS 1/228.

|        |                       |      |        |       |        |       |        |        |        |
|--------|-----------------------|------|--------|-------|--------|-------|--------|--------|--------|
|        | Tira Dumitru          | PPEM | 0.36%  | 819   | 0.40%  | 803   | 0.36%  | 816    | 0      |
|        | Marinuta Vitalie      | PVE  | 0.44%  | 1001  | 0.55%  | 1198  | 0.44%  | 993    | 0      |
|        | Nastase Andrei        | ACUM | 31.08% | 70056 | 30.76% | 67180 | 30.92% | 69 462 | 0.16%  |
|        | Ranogaet Lilia        | PNL  | 0.28%  | 620   | 0.30%  | 597   | 0.27%  | 617    | 0.01%  |
|        | Fetescu Alexandru     | PLDM | 0.55%  | 1235  | 0.54%  | 1191  | 0.55%  | 1229   | 0      |
|        | Chirtoaca Dorin       | PL   | 10.15% | 22885 | 10.08% | 22031 | 10.16% | 22817  | -0.01% |
|        | Diacov Ivan           | PN   | 1.00%  | 2252  | 0.99%  | 2155  | 1.00%  | 2240   | 0      |
|        | Cebotari Vladimir     | PDM  | 2.44%  | 5504  | 2.41%  | 5248  | 2.44%  | 5475   | 0      |
|        | Ticu Octavian         | PUN  | 4.76%  | 10739 | 4.71%  | 10288 | 4.76%  | 10691  | 0      |
|        | Toma Serghei          | TREE | 0.14%  | 306   | 0.10%  | 291   | 0.14%  | 304    | 0      |
|        | Turcanu Vladimir      | PPR  | 0.81%  | 1816  | 0.80%  | 1753  | 0.80%  | 1808   | 0.01%  |
|        | Volosatii Boris       | PDA  | 0.26%  | 591   | 0.30%  | 558   | 0.26%  | 589    | 0      |
| Balti  | Nesterovschi Alexandr | PSRM | 16.21% | 5960  | 15.80% | 5454  | 16.21% | 5960   | 0      |
|        | Formaniuc Ghenadii    | PPS  | 3.86%  | 1418  | 3.76%  | 1295  | 3.86%  | 1418   | 0      |
|        | Rubtov Serghei        | PCRM | 1.16%  | 425   | 1.20%  | 403   | 1.16%  | 425    | 0      |
|        | Mihailov Sergiu       | PDM  | 1.94%  | 714   | 2.00%  | 675   | 2.02%  | 744    | -0.08% |
|        | Usatii Renato         | PN   | 61.93% | 22775 | 62.25% | 21431 | 61.93% | 22775  | 0      |
|        | Burlacu Sergiu        | PUN  | 3.77%  | 1386  | 3.73%  | 1284  | 3.77%  | 1386   | 0      |
|        | Dorojco Vladimir      | PSM  | 0.29%  | 108   | 0.30%  | 102   | 0.29%  | 108    | 0      |
|        | Marcoci Boris         | ACUM | 9.02%  | 3316  | 9.15%  | 3151  | 9.02%  | 3316   | 0      |
|        | Pcela Serghei         | PLD  | 0.83%  | 304   | 0.40%  | 129   | 0.36%  | 131    | 0.47%  |
|        | Dobrogeanu Vasile     | PL   | 0.36%  | 131   | 0.60%  | 221   | 0.64%  | 236    | -0.28% |
|        | Grosu Diana           | PPR  | 0.64%  | 236   | 0.80%  | 284   | 0.83%  | 304    | -0.19% |
| Comrat | Anastasov Serghei     | PSRM | 94.58% | 9671  | 94.58% | 9671  | 94.58% | 9671   | 0      |
|        | Chireacova Galina     | PPS  | 5.42%  | 554   | 5.42%  | 554   | 5.42%  | 554    | 0      |

## LIST OF ABBREVIATIONS

art. - article  
ATUG - Autonomous Territorial Unit of Gagauzia  
CEC - Central Electoral Commission  
DEC – District Electoral Council  
EC – electoral council of level I  
IC - independent candidate  
let. – letter  
LPA - local public administration  
LTO - long-term observer  
OM - observation mission(s)  
para. - paragraph  
PEB – Precinct Electoral Bureau  
PS - polling station  
STO - short-term observer  
USAID - United States Agency for International Development

ACUM Bloc – “ACUM: DA and PAS Platform” electoral Bloc  
MPA – Antimafia Popular Movement, Political Party  
MPSN - "Speranța - Nadejda" Professional Movement, Political Party  
MSPFN - "New Force" Social-Political Movement, Political Party  
PAD – Party of Democratic Action  
PAS – Party of Action and Solidarity  
PCRM - Communist Party of the Republic of Moldova  
PDM - Democratic Party of Moldova  
PL - Liberal Party  
PLDM - Liberal Democratic Party of Moldova  
PN - Our Party, Political Party  
PNL - National Liberal Party  
POM - Political Party of Working People  
PPDA – Democracy at Home, Political Party  
PPEM - European People's Party of Moldova, Political Party  
PPM - Patriots of Moldova, Political Party  
PPPDA - Dignity and Truth Platform, Political Party  
PPR - Romanian People's Political Party  
PPRM - People's Party of the Republic of Moldova, Political Party  
PPS – Political Party of Sor  
PPVP - The Will of the People, Political Party  
PSA - Public Services Agency  
PSE - European Left Party  
PSM - Socialist Party of Moldova  
PSRM - Party of Socialists of the Republic of Moldova  
PUN - The Party of National Unity  
PVE - Green Ecologist Party  
SMC – Single Member Constituency  
USB - Union Save Bessarabia, Political Party

## ANNEXES

### Annex 1. Other incidents

| Other           |  |  |
|-----------------|--|--|
| Number of cases | Description  | PS   |
| 1               | Signing in place of another person in the main lists   | PS 1/298   |
| 1               | A voter writes in the voters' list a phrase in the place intended for the signature of another voter | PS 1/192   |
| 2               | Allocation of ballots from PS 274 to PS 275  | PS 1/275, PS 274   |
| 1               | Presentation of data on voter turnout  | CEC website  |
| 1               | Camcorders in operation during the voting process  | PS 21/2  |
| 1               | A voter came to vote being drunk   | PS 1/196   |
| 1               | Involvement of the party observers in the activity of the PEB  | PS 1/47  |
| 1               | Missing ballots  | PS 11/30   |
| 1               | Relocation of voting booths during the election day, round I   | PS 1/273   |
| 1               | Voting based on a sales and purchase agreement   | PS 1/196   |
| 4               | Influencing the voter's choice   | PS 1/174, PS 1/22, PS 2/27, PS 15/4, 11/30               |
| 1               | Failure to follow the procedure for canceling the votes  | PS 4/29  |
| 1               | Voting without applying the signature in the main voters' lists                                      | PS 18/67   |
| 5               | Deficiencies in voting at the place of domicile, involving the mobile ballot box                     | PS 1/154 (2), PS 31/32, PS 1/56, PS 1/255                |
| 6               | Deficiencies related to the use of the accompanying sheet of the ID card                             | PS 1/119, PS 1/152, PS 2/18, PS 2/21, PS 26/37, PS 1/269 |
| 1               | Failure to follow the procedures for opening the polling station                                     | PS 2/50  |
| 1               | Failure to follow the procedure for vote counting  | PS 1/22  |
| 1               | Power failures in the PS   | PS 7/43  |
| 3               | Scandals made by voters related to ballots received  | PS 1/283, PS 5/4, PS 1/196                               |
|                 | <b>Total: 34 cases</b>   |  |

## Annex 2. Erroneous protocols on vote counting results in the national constituency

| No. | C / PS | District / Settlement | Nr. errors | Error   |
|-----|--------|-----------------------|------------|---|
| 1   | 01-291 | Chisinau - CIORESCU   | 4          | D == F + H<br>I == C + J<br>F == D-H<br>J == I-C  |
| 2   | 01-012 | Chisinau - BOTANICA   | 1          | H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18                           |
| 3   | 01-018 | Chisinau - BOTANICA   | 3          | D == F + H<br>H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18<br>F == D-H |
| 4   | 01-056 | Chisinau - BOTANICA   | 2          | I == C + J<br>J == I-C  |
| 5   | 01-073 | Chisinau - BUIUCANI   | 2          | I == C + J<br>J == I-C  |
| 6   | 01-112 | Chisinau - BUIUCANI   | 1          | H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18                           |
| 7   | 01-119 | Chisinau - CENTER     | 2          | I == C + J<br>J == I-C  |
| 8   | 01-163 | Chisinau - CIOCANA    | 1          | H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18                           |
| 9   | 01-226 | Chisinau - RISCANI    | 3          | I == C + J<br>H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18<br>J == I-C |
| 10  | 02-011 | Balti - BALTI         | 1          | H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18                           |
| 11  | 02-032 | Balti - BALTI         | 1          | C <= A + B  |
| 12  | 04-025 | Anenii Noi - HIRBOVAT | 3          | D == F + H<br>H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18<br>F == D-H |
| 13  | 08-028 | Cantemir - GOTESTI    | 1          | H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18                           |

|      |        |                           |   |  |
|------|--------|---------------------------|---|--|
| 14   | 11-035 | Cimislia - LIPOVENI       | 3 | $D == F + H$ $H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18$ $F == D-H$  |
| 15   | 17-007 | Falesti - ALBINETUL VECHI | 1 | $H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18$  |
| 16   | 18-005 | Floresti - FLORESTI       | 3 | $D == F + H$ $H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18$ $F == D-H$  |
| 17   | 18-006 | Floresti - FLORESTI       | 1 | $H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18$  |
| 18   | 18-009 | Floresti - ALEXEEVCA      | 1 | $E == C-D$   |
| 19   | 21-002 | Ialoveni - IALOVENI       | 2 | $I == C + J$ $J == I-C$  |
| 20   | 21-048 | Ialoveni - VASIENI        | 5 | $C > = D$ $D == F + H$ $E == C-D$ $H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18$ $F == D- H$                                      |
| 21   | 23-010 | Nisporeni - BARBOIENI     | 1 | $H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18$  |
| 22   | 28-007 | Singerei - ALEXANDRENI    | 2 | $I == C + J$ $J == I-C$  |
| 2. 3 | 29-040 | Soroca - OCOLINA          | 2 | $D == F + H$ $F == D-H$  |
| 24   | 29-060 | Soroca – TATARAUCA NOUA   | 8 | $C < = A + B$ $C > = D$ $D == F + H$ $E == C-D$ $I == C + J$ $H == G1 + G2 + G3 + G4 + G5 + G6 + G7 + G8 + G9 + G10 + G11 + G12 + G13 + G14 + G15 + G16 + G17 + G18$ $F == D-H$ $J == I-C$ |