

# OBSERVATION MISSION

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PRESIDENTIAL ELECTIONS AND  
REPUBLICAN CONSTITUTIONAL REFERENDUM  
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# Promo-LEX

*Advancing democracy and human rights*

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The observation mission is carried out under the auspices of the Civic Coalition for Free and Fair Elections.

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

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## EXECUTIVE SUMMARY

**Legal framework.** During the observation period, the Constitutional Court found the constitutionality of the term of holding elections for the office of President established by the Electoral Code – no later than 90 days before the date of expiration of the term of office of the incumbent President.

Two legal situations related to the registration of electoral competitors were observed during this election. In the first situation, the Promo-LEX OM noted the application of a new ground for refusing to register initiative groups - the independent candidate's membership in a political party. Promo-LEX considers that the list of grounds for refusal must be exhaustively laid down in the legislation. In the second situation, it was found that the legal framework does not contain precise and sufficient provisions that would ensure equal opportunities for all competitors in the presidential election, given the participation of the incumbent President. This was also observed in the 2020 presidential election.

According to Promo-LEX, the modification of the related legal framework before the start of the campaign by tightening the sanction for unjustified non-handing of the ballot paper affects the predictability and stability of the electoral legal framework.

**Electoral bodies.** During the reference period, the CEC met in a mixed format in 17 meetings and adopted 138 decisions on the organization and conduct of elections. Most of the decisions concerned the activity of lower electoral bodies (39%) and the designation and registration of electoral competitors (29%).

The process of accreditation of observers is intensifying. During the monitored period, 667 national and international observers out of a total of 719 were accredited. As of 17 September 2024, the CEC accredited 643 national and 76 international observers. The Promo-LEX Association accredited 633 observers.

Most DEC's follow the schedule. Out of a total of 74 visits during working hours, in 95% the offices of DEC's were open. At the same time, more than half (57%) of premises of DEC's are accessible / partially accessible for people with special needs, according to Promo-LEX observers.

In the context of the presidential election and the constitutional referendum of 20 October 2024, 2,221 polling stations were set up, of which 30 PS were organized for voters from the Transnistrian region, and 234 PS were set up abroad. Compared to the 2020 presidential election, the number of polling stations established by the CEC for the Transnistrian region decreased (from 42 to 30), while the number of those organized abroad increased (from 139 to 234).

According to Promo-LEX, the distribution of PS's established abroad largely corresponds to an equidistant methodological approach, based on the main criterion of voter participation rates in the last 3 elections, but also on the complementary criteria established by the legislation. The decision-making process was participatory and largely transparent. The CEC published and consulted publicly, for the first time, a preliminary list of polling stations.

In the case of the PS open for the Transnistrian region, we believe that based on the average number of voters per PS and under the conditions of "rationalization" of their location, access to vote will still be ensured.

**Electoral disputes.** Eight complaints were filed to the CEC during the reporting period, five of which were from Vasile Bolea. For most complaints the CEC issued answers based on the Administrative Code. However, based on the principle of celerity of procedures and taking into account the period in which they were submitted, the Promo-LEX OM considers that the CEC is to settle the appeals filed during the election period, mainly according to the Electoral Code.

The Chisinau Court of Appeal and the Supreme Court of Justice examined four appeals on electoral matters concerning the refusal to register initiative groups in support of independent candidates. The courts largely upheld the CEC's decisions refusing to register initiative groups. Analyzing court judgments, four cases were found where the deadlines for considering the appeal were exceeded.

**Designation and registration of electoral competitors in the presidential election.** Thirteen (13) initiative groups (IG) were registered for the presidential election, of which six in support of independent candidates and seven nominated by political entities (six parties and one electoral bloc). At the same time, the CEC rejected the registration of six initiative groups, half of them because of formal declaration of the status of independent candidate.

Until the publication of the report, IGs submitted nine files for the registration of candidates to the CEC. Of them, the Commission adopted decisions on the registration of four candidates: Alexandr Stoianoglo (IC), Maia Sandu (PAS), Renato Usatii (OP), Vasile Tarlev (FMP).

**Registration of participants in the constitutional referendum.** Fourteen (14) applications were submitted for registration as a participant in the referendum. Of these, the Commission registered eight participants with the YES option and two with the NO option.

**Activity of initiative groups and nominated candidates.** During the observation period, at least 475 activities carried out by 12 IGs for the purpose of collecting signatures were observed. Most of the activities were carried out by the IG of Ion Chicu (PDCM), who carried out 30% of the observed activities, followed by the IG of Renato Usatii (OP) – 21%, and the IG of Maia Sandu (PAS) – 21%.

The Promo-LEX OM observed at least 1,120 cases of using pre-electoral advertising to collect signatures. Most were by the IGs of Ion Chicu (PDCM) – 370, Renato Usatii (OP) – 232, and Natalia Morari (IC) – 219.

**Use of administrative resources and activities with the potential to corrupt voters.** Promo-LEX observers reported at least 12 cases of misuse of administrative resources, of which 7 cases concerned PAS, 2 cases – Victory PB, one case each – Together EB, PDCM, and LPA. Also, observers found 4 cases that can be qualified as activities with potential to corrupt voters, carried out by the Victory PB and the FMP.

#### **Observation of election and campaign financing.**

Until 16 September 2024, 12 IGs of the 13 registered IGs reported income totaling MDL 2,009,727. Most income was declared by the IG of Maia Sandu (PAS) – 23% of total declared income, followed by the IG of Irina Vlah (IC) – 17%, and the IGs of Ion Chicu (PDCM) and Natalia Morari (IC) – 15% each.

For the signature collection activities carried out by 11 IGs, Promo-LEX estimated unreported expenses of at least MDL 580,321. The most unreported expenses were for the IG of Irina Vlah (IC) – 43%, followed by the IG of Maia Sandu (PAS) – 23%. The most common unreported expenses were for promotional materials (52%).

**Hate speech.** Between 20 August and 8 September 2024, at least 40 cases of hate speech and other forms of intolerance were identified. Most of them were disseminated through social media (19 cases) and mobile apps (10 cases). Most often, hate speech was based on the criteria of political affiliation (12 cases), sexual orientation/gender identity (8 cases), and sex/gender (6 cases).

The 40 cases of hate speech have been viewed more than 3 million times and shared more than 23 thousand times.

## INTRODUCTION

Report no. 1 has been prepared and presented in the context of the launch of the Promo-LEX Observation Mission (OM) for the presidential election and constitutional referendum of 20 October 2024. In general, it covers the period starting on 16 May 2024, when the Parliament adopted draft decisions on setting the date of election for the office of President of the Republic of Moldova and on holding the republican constitutional referendum. The report includes the results of observation of the pre-election period and the election period until the start of the period of registration of initiative groups, designation, and collection of signatures for the presidential election of 20 August 2024.

The public reports presented by the Promo-LEX OM during its activity will include findings, conclusions and recommendations on both observed ballots: the presidential election and the constitutional referendum. Depending on the type of issues monitored, information will be presented either in compiled format without being divided per ballot (for example, regarding electoral lists), or will be divided into sub-compartments (for example, regarding campaign events).

The main findings and trends in the current report relate to the social, political and legal context of the ballots, the work of electoral bodies and the activities with electoral impact of potential candidates or participants in the referendum. Also, the results of monitoring the financing of the electoral campaign and hate speech will be presented.

Over the course of the Mission, Promo-LEX will present four interim observation reports (five in the case of the second round of election) and a final report. For the election day (including for the second round of the presidential election, if necessary), press releases on the conduct of the ballots and the results of the rapid counting of votes will be prepared.

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 ballots; to hold the electoral actors accountable; to prevent possible violations of the electoral legislation.

The observation methodology applied by Promo-LEX is based on international standards in the field and involves observation of elections both in the long term (election period) and in the short term (election 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 ballots: (potential) electoral competitors, participants in the referendum, 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](http://www.data.promolex.md), secure system with limited access, managed by Promo-LEX. Promo-LEX observers collect and analyze information resulting from on-site observations during visits to the territory, from interviews and meetings with interlocutors, as well as from study of official documents. The activities of electoral competitors and participants in the referendum will also be monitored online.

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

Observation of electoral procedures will be carried out during the election period by 45 LTOs, including two LTOs who will be responsible for monitoring electoral campaigns and voting day abroad. Promo-LEX will monitor hate speech and discrimination through seven monitors.

On election day, the Promo-LEX OM will ensure the observation of voting by covering polling stations based on a representative sample made of 600 static short-term observers (STOs). Their effort will be

supplemented by 140 STOs who will visit the rest of the polling stations being grouped into 70 mobile teams, two observers per team.

Promo-LEX will observe every polling station set up for voters in the Transnistrian region. Over 50 polling stations opened abroad will also be covered with observers. In this regard, special attention will be paid to the polling stations established for postal voting, as well as those where voting will take place over two days.

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 Conduct<sup>1</sup> for Promo-LEX independent national observers, assuming the obligation to act operatively, in good faith and in a nonpartisan manner.

The OM for the presidential election and the constitutional referendum of 20 October 2024 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 complaints 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](http://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 27th. 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 the United States Agency for International Development (USAID), the European Union and the German Marshall Fund of the USA, the Government of the United Kingdom of Great Britain and Northern Ireland, the International Organization of Francophonie and Soros Foundation Moldova.

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



## **I. LEGAL FRAMEWORK**

### **1.1. Reasoning of the Constitutional Court regarding the term of the presidential election**

On 22 August 2024, the Constitutional Court registered the application<sup>2</sup> filed by Vladimir Voronin and Diana Caraman, requesting constitutional review of texts in art. 135 para. (2) of the Electoral Code and Parliament Decision no. 122 of 16 May 2024 on the date of the presidential election.

The main object of the application was the period within which the presidential election is organized. In substance, the applicants mentioned that the 90-day term for organizing presidential election, indicated in art. 135 para. (2) of the Electoral Code, is contrary to art. 90 para. (4) of the Constitution, which establishes a term of 2 months from the date on which the mandate expires.

On 16 September 2024, the Constitutional Court declared the application inadmissible<sup>3</sup>, noting that the timeframe in art. 90 para. (4) of the Constitution, to which the applicants refer in their criticisms, concerns presidential election held if vacancy of this office occurred, while the timeframe established in art. 135 para. (2) of the Electoral Code refers to the organization of presidential election in case of expiration of the term of office of 4 years and represents a legal situation distinct from the one established in art. 90 para. (4) of the Constitution.

*The Promo-LEX OM appreciates the speed with which the Court ruled on the application concerning the ongoing election, thus removing possible uncertainties regarding the constitutionality of electoral rules.*

### **1.2. Deficient legal framework concerning the conditions for the participation of the incumbent president in the presidential election of 20 October 2024**

The candidate elected for the office of President of the Republic of Moldova cannot be a member of any political party, a ban established by the legislator for the first time by Law no. 147 of 15.06.2016, adopted to adjust the legislation to the Constitutional Court Decision no. 7 of 04.03.2016. This decision revived the election of the President of the Republic of Moldova by the people.

Subsequently, by two other decisions<sup>4</sup>, the Constitutional Court reaffirmed that the President of the Republic of Moldova must act in the interests of the entire society, and the settlement of differences between state powers, as well as between political parties, can be achieved only when he or she is an arbitrator who identifies himself or herself with the national interest, and not with one political party.

Thus, the High Court set a very high standard, suggesting that there should be no “trace of appearance” of connections between a candidate for the office of President of the Republic of Moldova and a political party. This is because the incompatibility imposed on the President serves the benefit of that office, since it contributes to the establishment of a favorable framework for the exercise of his or her constitutional duties, detached from political parties.

On 22.08.2024, the Action and Solidarity Party (hereinafter PAS) nominated Maia Sandu to the office of President, while she is also the current President of the Republic of Moldova from 24 December 2020 until 24 December 2024. In this context, the impartiality and political neutrality of the incumbent president could be questioned.

At the same time, from the perspective of ensuring equality for all electoral competitors, we shall point out that constitutional rules do not provide for the possibility of suspending the incumbent President of the Republic of Moldova for activities related to electoral processes, the sole basis for suspending (art. 89 para. (1) of the Constitution) being the commission by the head of state of severe acts against the Constitution.

In this context, the Promo-LEX OM reminds that during the 2020 presidential election, too, they found the impossibility to clearly delimit between the activities carried out by the incumbent president as job duties

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<sup>2</sup> [Application](#) no. 176a of 22.08.2024

<sup>3</sup> [Decision](#) of the Constitutional Court on inadmissibility of application no. 176a of 22.08.2024

<sup>4</sup> Constitutional Court [Decision](#) no. 2 of 24.01.2017 (para. 31) and [Decision](#) no. 35 of 12.12.2017 (para. 57)



and the activities carried out by the candidate in the election<sup>5</sup>. Although in the 2020 presidential election the incumbent President Igor Dodon was registered as an independent candidate, the Promo-LEX OM noted his support by the PSRM<sup>6</sup>.

Given the deficiency of legal framework in this regard, and in order to ensure equal opportunities for all electoral competitors, we recommend that the incumbent President refrain from participating in official public events that may also be perceived as electoral campaign activities; limit to the maximum the use of administrative resources during the electoral campaign, including by refraining from making non-essential appointments to public offices or announcing major initiatives that create a favorable perception for a candidate; etc.

Also, we reiterate the previously formulated recommendation on the need to regulate conditions for the participation of the incumbent President (at the end of his or her mandate) in the presidential elections, by amending the Electoral Code and/or having the High Court interpret constitutional provisions.

### **1.3. Uncertainties regarding the grounds for refusal of registration or annulment of registration of initiative groups**

The Promo-LEX OM found that the CEC rejected 5 applications for registration of initiative groups, reasons ranging from failure to obtain the required number of votes of CEC members<sup>7</sup>, failure to have at least 25 members of the initiative group<sup>8</sup>, the candidate not being proficient in the Romanian language<sup>9</sup>, and membership in another political party<sup>10</sup> (see Chapter IV).

According to art. 140 para. (6) of the Electoral Code, the detailed procedure for the establishment and registration of initiative groups shall be set in the Regulation<sup>11</sup> approved by the Central Electoral Commission. Thus, the Regulation provides for three grounds for refusal to register an initiative group: a) failure to have the required number of persons corresponding to the necessary conditions to be registered as members of the initiative group – minimum 25; b) failure to submit some or all documents; c) non-conformity of the documents submitted.

The Promo-LEX OM points out that the refusal to register an initiative group because of the candidate's membership in a political entity is not a ground expressly provided for in the Electoral Code or the Regulation, nor does it directly result from existing legal provisions. However, this ground was invoked by the CEC in the case of at least four independent candidates (V. Bolea, A. Tabarcea, V. Tarlev, V. Borodachi). In its decisions, the CEC explained that "the admissibility of appointing a person as an independent candidate is imperatively preconditioned by his apolitical status, regardless of his role in the given political entity." However, some aspects in the interpretation of the CEC are unclear:

- how long a person nominating himself as a candidate must not have been a member of a political party prior to the election;
- whether he should prove his political non-affiliation, or how he should disassociate from the party.

We shall draw attention that the notion of independent candidate, provided in art. 1 of the Electoral Code, means "a person who stands as a candidate for elective public office independently of political parties and electoral blocs, registered appropriately." From here, we distinguish three features of an independent candidate: 1) he must be a natural person; 2) he must stand as a candidate independently, i.e. by himself,

<sup>5</sup> [Report no. 2](#) of Promo-LEX OM on observation of the presidential election of 1 November 2020, p. 11

<sup>6</sup> [Report no. 4](#) of Promo-LEX OM on observation of the presidential election of 1 November 2020, p. 13

<sup>7</sup> [Information letter](#) no. CEC-8/5810 of 04.09.2024, sent by the CEC to Avelin Tabarcea;

<sup>8</sup> CEC [Decision](#) no. 2733 of 24.08.2024 on the application for registration of the initiative group to support the candidate Valeriu Pleșca for the office of President of the Republic of Moldova;

<sup>9</sup> CEC [Decision](#) no. 2739 of 24.08.2024 on the application for registration of the initiative group to support the candidate Ludmila Corsun for the office of President of the Republic of Moldova;

<sup>10</sup> CEC [Decision](#) no. 2752 of 29.08.2024 on the review of the application for registration of the initiative group to support the candidate Vasile Tarlev for the office of President of the Republic of Moldova and CEC [Decision](#) no. 2754 of 29.08.2024 on the review of the application for registration of the initiative group to support the candidate Vasile Bolea for the office of President of the Republic of Moldova;

<sup>11</sup> [Regulation](#) on the establishment and registration of initiative groups, preparation, presentation, and verification of signatures collecting lists, approved by CEC Decision no. 1166 of 11.08.2023

separately, individually, alone – that is, he can theoretically be a party member, who can decide at a certain time that the policy and vision of the party and/or electoral bloc do not coincide with his principles and decide that he wants to stand as a candidate independently; 3) an independent candidate must be registered appropriately, that is, in accordance with electoral law.

Summarizing these aspects, it is not clear how the CEC concluded that “the admissibility of appointing a person as an independent candidate is imperatively preconditioned by his apolitical status”, since the definition of independent candidate does not state anything about the presence or absence of the candidate’s political status.

Taking into account the above, we recommend the legislator to expressly regulate cases of refusal to register initiative groups, including in situations where candidates supported by parties request to be registered as independent, so that the regulatory framework could be predictable for the actors of the electoral process.

#### **1.4. Amendment of the related electoral legal framework**

At the meeting of 18 September 2024, the Government examined the draft law on amending the Contravention Code<sup>12</sup>, in which, *inter alia*, it was proposed to amend the sanction for violation of electoral legislation by the members of the electoral body, namely, for unjustifiably not handing the ballot paper to the person registered in the voters’ list or for handing more ballot papers to one voter than is provided by law.

Thus, if the Parliament adopts the above-mentioned draft law, the person will be subject to punishment in the form of a fine of MDL 2,800 to MDL 5,000. We shall remind that currently the penalty for these acts according to the Contravention Code<sup>13</sup> ranges from MDL 300 to MDL 600.

In the light of the above, the Promo-LEX OM expresses its concern over the proposed amendments, as they occur in the run-up to the ballots of 20.10.2024, affecting the predictability and stability of the related electoral legislation. In addition, we shall note that the proposed penalty appears to be unreasonably high in relation to the remuneration of the members of electoral bodies, and in these circumstances *we recommend that the authors of this draft law refrain from sending it to the Parliament.*

We shall emphasize that this amendment was not subject to public consultations and approval by the Central Electoral Commission<sup>14</sup>, although its existence and/or implementation might have a discouraging effect on the process of appointing members to precinct electoral bureaus.

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<sup>12</sup> [Draft law](#) on amending the Contravention Code

<sup>13</sup> Art. 53 para. (3) of the [Contravention Code](#)

<sup>14</sup> Art. 32 para. (2) of Law no. 100/2017 on regulatory acts

## II. ELECTORAL BODIES

### 2.1. The work of the Central Electoral Commission

**Approval of decisions on the organization and conduct of elections.** During the period under observation, the CEC met in 17 sittings and adopted 138 decisions. Most of the approved decisions concerned the work of hierarchically lower electoral bodies – 54 (39%), nomination and registration of candidates, registration of referendum participants – 40 (29%), and accreditation/confirmation of persons authorized to participate in the electoral process – 24 (18%).

**Accreditation of observers.** During the period under observation, the CEC accredited 667 observers: 591 national observers and 76 international observers and experts. Situations in which applications were rejected have not been found.

In total, in order to monitor the ballots of 20 October 2024, the electoral authority accredited 719 observers from 12 national and foreign institutions: 643 national observers and 76 international observers and experts, including the international election observation missions ENEMO, OSCE/ODIHR, and NDI (see Annex no. 1). Of the total number of accredited national observers, 633 (98%) were from Promo-LEX Association.

**Approval of public interest messages.** In the observed timeframe, the CEC approved 12 messages of public interest (nine video spots, two leaflets, and one informative poster), prepared by the Commission (5), the Diaspora Relations Bureau (2), “Comunitatea Plus” Public Association (1), Council of Europe Office in Chisinau (1), and Bright Communications (3) (See Annex no. 1).

**Authorization to conduct opinion polls and exit polls.** During the reference period, the CEC authorized the conduct of four opinion polls on the political preferences of voters. In total, the electoral authority approved the conduct, during the election period, of nine opinion polls by five companies/organizations (see Annex no. 1).

At the same time, the Promo-LEX OM identified at least one opinion poll on the political preferences of voters unauthorized by the CEC. Thus, the civic platform “For Fair Elections”<sup>15</sup> conducted, between 20 August and 20 September 2024, an opinion poll on the favorites of the pre-election race for the presidency of the Republic of Moldova<sup>16</sup>. We shall remind the subjects with the right to order and/or finance opinion polls and exit polls that, according to the regulatory framework<sup>17</sup>, opinion polls on the political preferences of voters conducted during the election period must be authorized by the Central Electoral Commission (CEC).

**CICDE training activities.** In order to ensure a qualitative electoral process, during the reference period, CICDE trained and empowered 345 members of DECAs (about 86% of their total number), 262 registrars of the SRV, 100 operators, 16 signature collectors, and 268 representatives of public institutions responsible for maintaining public order and security. At least 22 trainings were conducted for this purpose<sup>18</sup> with a focus on: actions for organizing and conducting the ballots of 20 October 2024, management of voters’ lists, collection of signatures and preparation of signatures collecting lists, enforcement of public order, contraventions and offenses during the election period.

**Public information.** The CEC meetings are public and accessible on online platforms. At the same time, the electoral authority makes sure that the general public and interested parties are informed, through its website, about the process and actions taken to organize the elections, including by publishing the decisions of DECAs. However, the Promo-LEX OM notes the continued lack of information on adopted documents in the section “Decision-making transparency / decision-making process”. We shall also point out that in this period, too, there have been periodic difficulties in accessing the section “Entry/exit

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<sup>15</sup> According to description, the civic platform “For Fair Elections” is a program whose purpose is to resist attempts to falsify election results and exercise public control by conducting opinion polls in exit polls.

<sup>16</sup> [Opinion poll of the civic platform](#) “For Fair Elections”

<sup>17</sup> [CEC Regulation](#) on the organization and conduct of opinion polls and exit polls during the election period

<sup>18</sup> [Activities](#) organized by CICDE.

documents” on the Commission’s website. We believe that ensuring the transparency of the whole process is very important. Therefore, the electoral authority must properly fulfill its obligation to inform the general public and all subjects of the electoral process correctly, completely, and within a short time.

**Aspects of ensuring polling station infrastructure.** In the context of preparing for the presidential election of 2024, on 25.03.2024, before the election date was set, the Central Electoral Commission initiated the procurement of a batch of portable computers (laptops) in the amount of 2,300 pieces, in order to renew the batch of laptops to be used by PS operators on election day.

Despite the fact that the procedure was started four months before the start of the election period, we found that by the time of publication of this report, the equipment had not been procured.

Procedurally, after the re-evaluation of offers in the first procurement procedure, the electoral authority, through a working group, annulled its results on 28 June 2024. Following the examination of appeals filed against this decision, the National Agency for Settlement of Appeals (ANSC) concluded that “the decision of the working group (...) does not contradict the regulatory provisions in the field of public procurement.”<sup>19</sup> As a result, on 1 August 2024, the CEC initiated procurement through the exceptional procurement procedure, and on 20 August it approved the decision to award the contract to the selected economic agent. However, this decision of the working group was appealed against, too. On 3 September 2024, less than two months until election day, ANSC decided to return the appeals “without consideration in substance”. This way, appellants can use other remedies provided by the Administrative Code, and the purchase of laptops is further postponed.

In the context of the above, we shall remind that according to the regulatory framework, the CEC must provide polling stations with laptops and other equipment/materials necessary for the proper conduct of the voting process. A good technical condition of laptops is absolutely necessary for qualitative and operative verification of voters in the “Elections” automated information system, but also for prevention of multiple voting.

## **2.2. Work of second-level district electoral councils**

**Confirmation and modification of DEC composition.** According to art. 35 para. (4) of the Electoral Code, the following entities have the right to designate members to DEC: the court and local council in whose territorial area the respective district electoral council is located (two members each); political parties represented in the Parliament (one member each)<sup>20</sup>. Thus, in order to enforce the above provision, the CEC addressed the leadership of political parties with a request to propose one member for each of the 37 second-level district electoral councils<sup>21</sup>.

On 31 August 2024, within the deadline stipulated by the calendar program, the electoral authority established district electoral councils for the localities on the left bank of the Dniester (DEC no. 37) and for polling stations abroad (DEC no. 38), and confirmed the nominal composition of the 37 councils. Subsequently, the nominal composition of eight DEC<sup>22</sup> underwent changes due to the resignation of 11 appointed members.

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

- For 35 DEC (95%), the established numerical composition was 11 members, and for two DEC (no. 5 Basarabeasca and no. 15 Dubasari) it was nine members;
- Gender equality has not been ensured in the establishment of electoral bodies, the share of women members of DEC being significantly higher than that of men (71% versus 29%);

<sup>19</sup> [ANSC Decision](#) no. 03D-507-24 of 23.07.2024 on the rejection of appeals of ACCENT ELECTRONIC SA and BTS PRO SRL.

<sup>20</sup> We shall remind that the chairperson of DEC works with permanent status, being appointed in accordance with Law no. 158/2008 on public office and the status of civil servant.

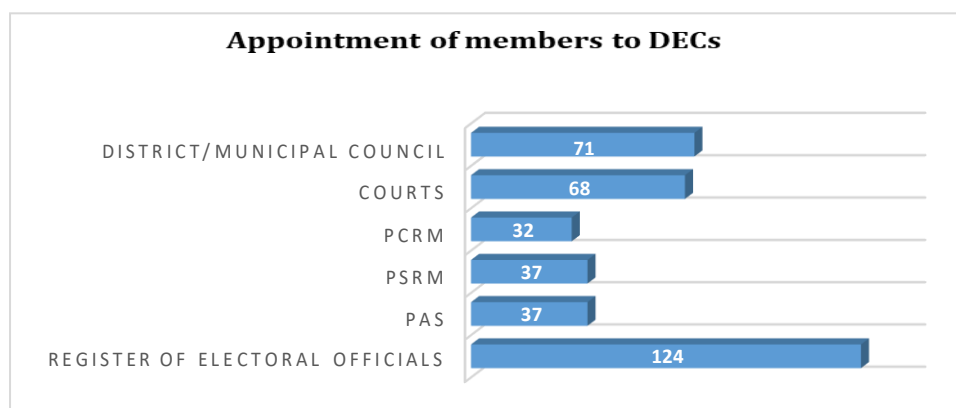
<sup>21</sup> [CEC Letter](#) no. CEC-8/5119 of 2.06.2024

<sup>22</sup> DEC no. 1 Chisinau, no. 2 Balti, no. 8 Cantemir, no. 24 Ocnita, no. 28 Singerei, no. 32 Stefan Voda, no. 34 Telenesti, no. 36 ATU Gagauzia.

- Leadership positions are also mostly filled by women (59% versus 41% – chairperson, and 78% versus 22% – secretary);
- The secret voting procedure for the election of the secretary was observed in the absolute majority of cases, with the exception of DEC no. 36 ATU Gagauzia<sup>23</sup>;
- Gender balance in the leadership of the electoral body was found only in 15 electoral councils (40%).

The appointment of members to the electoral body by the entities having this right is reflected in Graph no. 1.

Graph no. 1



Thus, based on the information analyzed by observers in the decisions establishing DEC's, we find that two of the three parliamentary parties – PSRM and PAS – delegated members to all DEC's. Also, we conclude that in 11 DEC's (30%) the number of members appointed by the local council is contrary to the rule of art. 35 para. (4) of the Electoral Code (2 members).

**Compliance with the work schedule.** According to Promo-LEX observers, in 95% of the 74 visits made, DEC's were open during working hours<sup>24</sup>.

**Accessibility of DEC premises.** According to reports of Promo-LEX observers, only 17 (46%) electoral councils are accessible to vulnerable groups, 4 (11%) are partially accessible, and 16 (43%) are inaccessible. We believe that, by virtue of art. 51 of the Constitution of the Republic of Moldova, state institutions must provide normal conditions of social integration for persons with special needs, including participation in the electoral process at all levels.

**Difficulties in the work of electoral bodies.** During on-site visits and after discussions with electoral officials, observers found that one week after the establishment and confirmation of the nominal composition of electoral bodies, three councils (DEC no. 36 Gagauzia, no. 37 for localities on the left bank of the Dniester, and no. 38 for polling stations abroad) did not have a distinct space/office for the proper conduct of activities.

We shall highlight that on 28 and 29 August 2024, the electoral authority addressed the management of municipal and district councils with the request to make available to electoral councils distinct spaces for carrying out their activities. In the opinion of the Promo-LEX OM, in order to ensure conditions for the proper functioning of hierarchically lower electoral bodies, the CEC should have sent the request to local authorities starting with 31 July 2024, when the additional responsibilities of some central public administration authorities and entities were established for the election period of the presidential election and the republican constitutional referendum of 20 October 2024. We shall also remind the LPA that they

<sup>23</sup> According to art. 36 para. (2) of the Electoral Code, in case of early termination of the mandate of the chairperson and secretary of the Central Electoral Council of Gagauzia, until the seat is filled by another person, ad interim appointment and termination shall be ordered by a decision of the Central Electoral Commission.

<sup>24</sup> During one of the two visits to DEC no. 5 Basarabeasca, no. 36 Gagauzia, no. 37 for localities on the left bank of the Dniester, and no. 38 for polling stations abroad, the DEC offices were closed during working hours.

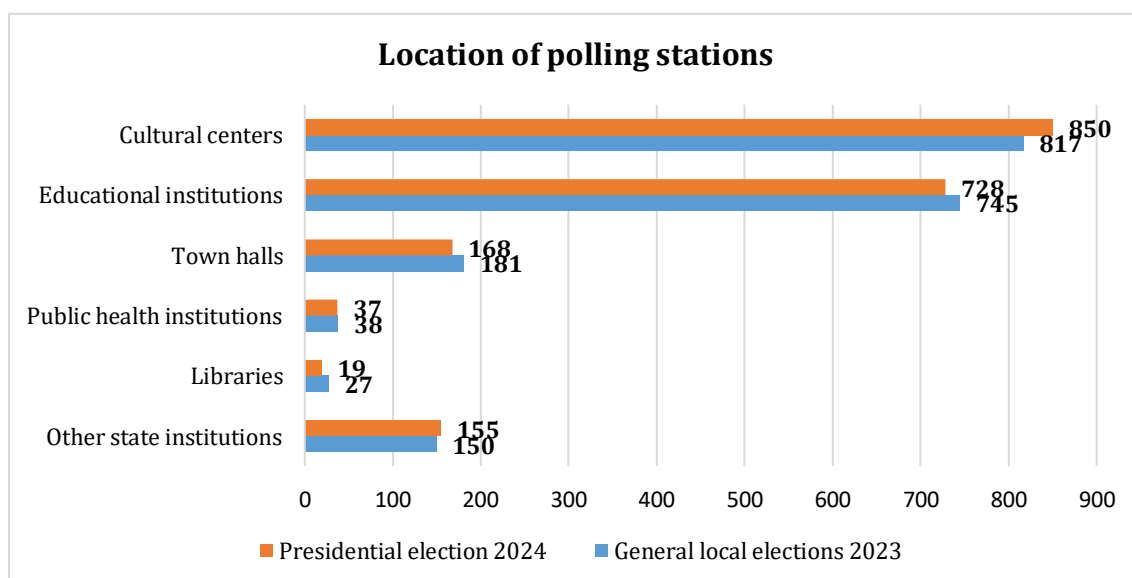
are obliged by law<sup>25</sup> to provide to electoral bodies established on their territory full support for the proper organization and conduct of elections.

**Establishment of polling stations.** Within the deadline stipulated by the calendar program (15 September inclusive), district electoral councils (except DEC no. 37 and no. 38) established, cumulatively, 1,957 polling stations – 5 PSs less than in the 2020 presidential election. This is due to changes in the total number of voters registered in the SRV, since in four years (2020-2024) the total number of citizens entitled to vote assigned to electoral districts decreased by over 58,000<sup>26</sup>.

Examining DEC decisions establishing polling stations (1,957) in terms of their location, the Promo-LEX OM notes the following:

- In a proportion of 97%, polling stations were opened in the premises owned by the state or the ATU and/or in those used or managed by the local public administration authorities;
- Most polling stations (81%) were opened in cultural centers and educational institutions, including preschool institutions;
- The share of polling stations opened in cultural centers slightly increased compared to the previous national elections (2023) (see Graph no. 2).

Graph no. 2



In the context in which the overwhelming majority (97%) of polling stations were opened in public spaces, we shall draw the attention of the LPA to the legal obligation, according to which the premises of a polling station and access ways to it must meet the accessibility requirements established in the Regulation on accessibility of the electoral process for persons with disabilities<sup>27</sup>. We shall emphasize that, according to Promo-LEX observations, in the November 2023 national elections, only 52% of the observed polling stations were accessible to persons with locomotor difficulties<sup>28</sup>.

A total of 2,221 polling stations were established for the autumn elections, including 30 polling stations for voters from the left bank of the Dniester and 234 polling stations for voters from abroad, established by the CEC in accordance with the provisions of the Electoral Code<sup>29</sup>.

**Confirmation of journalists.** During the reporting period, DEC confirmed 6 journalists from one media outlet for the coverage and monitoring of elections (see Annex no. 1).

<sup>25</sup> [Electoral Code](#), art. 44; [Law no. 436](#) of 2006 on local public administration, art. 53, lit. o).

<sup>26</sup> Number of voters assigned to DEC based on data from the SRV: 08.10.2020 – 2,798,306 voters versus 01.09.2024 – 2,740,172.

<sup>27</sup> [Instruction](#) on ensuring the infrastructure of polling stations, pt. 7.

<sup>28</sup> [Final Report](#) of the Promo-LEX Observation Mission for the general local elections of 5 (19) November 2023, p. 102.

<sup>29</sup> CEC decisions no. [2866](#) and [2867](#) of 14.09.2024.



### 2.3. Organization of elections for voters abroad

**Legal framework.** The regulatory framework for the organization and establishment of polling stations abroad is set in art. 39 of the Electoral Code, the Regulation on the establishment of polling stations abroad<sup>30</sup> and the Regulation on preliminary registration<sup>31</sup>. The regulatory framework of the CEC for voting abroad was adopted within reasonable terms for starting the procedures of organizing PSs, but exceeding the deadlines set by art. 244 para. (3) of the Electoral Code. The approval of the CEC regulations took place in an essentially transparent and participatory decision-making process.

The indication in the new Electoral Code of a main ground for the establishment of PSs abroad (the rates of voter participation at polling stations abroad in the last 3 elections), in the opinion of Promo-LEX, contributes to a clearer understanding of how to distribute PSs by country. At the same time, the preservation of the other two criteria – preliminary registration and information presented by the Ministry of Foreign Affairs (MFA) – as “complementary” may allow the authorities to adjust the list as needed.

Another novelty is the regulation of the possibility to organize PSs in localities where at least 500 voters stay temporarily or have a permanent domicile. We shall draw attention that the CEC decision on the organization of polling stations abroad<sup>32</sup> does not make it clear how the provision in question was applied and how it correlated with the distribution of PSs on the basis of grounds for their establishment.

Approval of regulatory framework for the partial implementation of postal voting<sup>33</sup> will make it possible to use, for the first time, an alternative voting mechanism for some citizens abroad at the election of 20 October 2024<sup>34</sup>.

**Establishment of polling stations abroad.** The Electoral Code stipulates that polling stations established abroad shall be organized at least 35 days before the date of the election. The decision on the organization of the respective polling stations was adopted within legal deadline, on 14 September 2024<sup>35</sup>.

The decision-making process was participatory and largely transparent. The CEC published and consulted publicly at an event, for the first time, a preliminary list of polling stations<sup>36</sup>. Also, the decision on the establishment of polling stations contains not only the list of sections, but also the explanation of the main actions carried out in order to implement the legal provisions.

Thus, for the first time in the electoral history of the Republic of Moldova such a large number of PSs – 234 – will be organized abroad, of which three for postal voting. We shall remind that 150 PSs were established for the parliamentary election of 2021 and 139 PSs for the presidential election of 2020.

Given the main ground established by the Electoral Code – the rates of voter participation in the last three elections – the Promo-LEX OM made its own estimate of the distribution of PSs per country (Table no. 1). Taking into account solely the criterion of participation in the last three elections (the main criterion), we note that the estimation made by the Promo-LEX OM differs in some places from the PS list established by the CEC.

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<sup>30</sup> [Regulation](#) on the establishment of polling stations abroad, approved by the Central Electoral Commission Decision no. 2542 of 28.05.2024.

<sup>31</sup> [Regulation](#) on preliminary registration, approved by CEC Decision no. 2513 of 10.05.2024.

<sup>32</sup> [CEC Decision](#) no. 2866 of 14.09.2024 on the organization of polling stations abroad and polling stations for postal voting for the republican constitutional referendum and election for the office of President of the Republic of Moldova of 20 October 2024.

<sup>33</sup> [Law no. 109](#) of 26.04.2024 on the partial implementation of postal voting.

<sup>34</sup> For more details on the approval of the regulatory framework related to postal voting and the position of the Promo-LEX Association, see [Report no. 1](#). Promo-LEX Observation Mission for the presidential election and the republican constitutional referendum of 20 October 2024, pp. 14-15, 18-19.

<sup>35</sup> [CEC Decision](#) no. 2866 of 14.09.2024 on the organization of polling stations abroad and polling stations for postal voting for the republican constitutional referendum and election for the office of President of the Republic of Moldova of 20 October 2024.

<sup>36</sup> [CEC press release](#). The issue of organizing polling stations outside the country and for voters from localities on the left bank of the Dniester discussed by the CEC with electoral subjects.



Table no. 1. Promo-LEX estimation of the distribution of polling stations per country according to the main ground (rates of voter participation at polling stations abroad in the last 3 elections)

No.	COUNTRY	CEC ELECTION 2021	CEC ELECTION 2024	Promo-LEX ESTIMATE 2024
1	Austria	1	2	2
2	Azerbaijan	1	1	1
3	Belarus	1	1	1
4	Belgium	2	4	5
5	Bulgaria	1	1	1
6	Canada	4	6	4
7	Czechia	1	2	3
8	China	1	1	1
9	Cyprus	1	1	0
9	Denmark	1	2	1
10	Switzerland	1	2	2
11	United Arab Emirates	1	1	1
12	Estonia	1	1	1
13	Russian Federation	17	5	10
14	France	10	20	21
15	Germany	11	26	20
16	Greece	1	2	3
17	India	0	1	1
18	Ireland	4	10	9
19	Israel	2	2	5
20	Italy	31	60	64
21	Japan	1	1	1
22	Latvia	1	1	1
23	Lithuania	1	1	1
24	Norway	1	1	0
25	United Kingdom	11	17	21
26	Poland	1	1	1
27	Portugal	3	6	5
28	Qatar	1	1	1
29	Netherlands	1	2	3
30	Romania	12	16	17
31	Spain	5	11	8
32	USA	13	16	9
33	Sweden	1	1	1
34	Turkey	2	2	3
35	Ukraine	2	2	2
36	Hungary	1	1	1
<b>TOTAL</b>		<b>150</b>	<b>231</b>	<b>231</b>

From the table above we see that most PSs would have to be opened in Italy, France, the UK, and Germany. Also, the CEC decided to open more PSs in the USA (+7) and Germany (+6), but these increases could easily be argued by the increased number of Moldovan citizens in the respective states: according to the MFA, in Germany there is an increase of 4.5 times, and in the USA – 3 times (Annex no. 2).

At the same time, according to Promo-LEX estimates, 4 polling stations less were assigned to Italy and the UK, which would be difficult to explain based on publicly available data. Regarding the number of PSs open for the Russian Federation, we consider justified the position taken by public authorities regarding security risks that may affect the freedom of voting.

Next, the Promo-LEX OM analyzed how the three legal criteria influenced the distribution of PSs by country:

**The rates of voter participation in the last 3 elections** is the main legal ground that was taken into account for the establishment of polling stations abroad. The number of voters who participated in the last three elections, with distribution per country, is available on the CEC website in the section of results of the types of elections organized by the CEC. Per country, most citizens with the right to vote went to the ballots in Italy, France, the UK, and Germany. Also, according to the table below, the second round of presidential elections causes the greatest degree of voter mobilization.

*Table no. 2. Rates of voter participation in PSs abroad (total number)*

	<b>Parliamentary election 2019</b>	<b>Presidential election 2020</b>	<b>Parliamentary election 2021</b>
<b>Number of voters abroad</b>	<b>76,583<sup>37</sup></b>	1st round – <b>150,022</b> 2nd round – <b>263,177</b>	<b>212,434</b>

Based on the above, the Promo-LEX OM notes that the rates of participation are increasing and considers justified the CEC's decision to increase the number of polling stations compared to previous elections<sup>38</sup>. At the same time, we shall point out that voter activism in the current election (along with other variables, such as political will or available financial resources) will determine whether this number of polling stations will be sustainable in the future.

Although the text of the above-mentioned CEC decision is not conclusive in terms of how the main and complementary grounds provided by the Electoral Code are to be applied, it can be seen that the institution used them to ensure an efficient geographical distribution of PSs abroad, taking into account the opinion of the MFA, too. In this context, in order to ensure greater transparency and clarity, the Promo-LEX OM recommends that the CEC publish on its website all documents related to the process of organizing the respective PSs, including the MFA opinion.

**Preliminary registration, including for postal voting.** Preliminary registration is a complementary criterion of PS distribution and is an optional procedure by which voters announce their intention to vote in a particular locality abroad. In this election, the CEC used certain functionalities of the subsystem also for registration for postal voting, the procedure being mandatory for those who apply to this alternative mechanism.

Preliminary registration ended on 6 September 2024. Overall, 21,708 persons registered for the election of 20 October 2024, twice less than in the previous national election in 2021.

*Table no. 3. Preliminary registration rates*

<b>Year</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2024</b>	<b>TOTAL<sup>39</sup></b>
<b>Preliminary registrations<sup>40</sup></b>	24,021	36,014	40,017	21,708	<b>118,617</b>

Given the rates of preliminary registration in the last elections, the Promo-LEX OM notes an unusual deviation in the number of registrations in the Russian Federation – 8,238 citizens with the right to vote,

<sup>37</sup> Results in the national electoral district.

<sup>38</sup> [Analytical note](#). Evolution of voting abroad of citizens of the Republic of Moldova. Chisinau: ADEPT, 2024, pp. 4-11.

<sup>39</sup> Calculations per year were made by Promo-LEX observers based on the data taken from the CEC website at the time of completion of preliminary registration procedures.

<sup>40</sup> The total number is the figure taken from the CEC website on 6 September 2024, at the end of the procedure. This figure differs from the sum of registrations per year in the table, a difference that can be explained by certain adjustments made along the way by the electoral authority, or by certain actions of the voters (cancellation or modification of the declaration).

that is, eight times more than in 2021<sup>41</sup>. However, if we take into account the fact that the number of Moldovan citizens located on the territory of the Russian Federation has significantly decreased in recent years<sup>42</sup>, and the number of voters who voted in this country in 2021 was on average approx. 360 persons per PS, there is a certain distrust in the veracity and “good faith” of the requests registered by the CEC.

*Table no. 4. Top 10 countries (compared to 2021 data)*

No.	Country	Preliminary registrations 2021	Preliminary registrations 2024	Preliminary registrations TOTAL
1	Italy	9,737	2,498	23,802
2	Germany	7,725	1,997	15,774
3	United Kingdom	6,710	1,014	16,926
4	France	3,901	1,003	9,714
5	Ireland	2,011	520	5,616
6	Spain	1,416	426	3,384
7	Romania	1,337	1,185	7,688
8	Russian Federation	1,106	8,238	14,853
9	USA	1,064	1,452	4,874
10	Portugal	921	165	1,710

In context, we appreciate that the reaction of the Russian diplomacy to the organization of five polling stations in the Russian Federation was aggressive, manipulative, and represented a further example of interference in the political life of the Republic of Moldova<sup>43</sup>. The Russian Federation seems to be the only state out of the 37 where PSs will be opened that has officially commented on the number of PSs established on its territory, which demonstrates a special interest for the electoral process in the Republic of Moldova.

***MFA information on the number and place of stay of Moldovan citizens abroad.*** According to the Electoral Code, the second complementary ground for establishing PSs abroad is the MFA data on citizens abroad. The Promo-LEX Association in the process of preparing the OM for the election of 20 October 2024 addressed a request for information to the MFA, which in its reply of 17 May 2024 presented information on the number of Moldovan citizens abroad.

Data in Annex no. 1 reveal that in 2024 most Moldovan citizens, according to MFA estimates, are in Italy (300,000), the Russian Federation (260,000), and France (160,000). Over time, compared to 2020, the authority found the largest increases in the number of citizens (in approximate values) in Italy (+171,000), France (+143,000), USA (+80,000), and Germany (+71,000). On the other hand, in a few countries there is a decrease in the number of Moldovan citizens, more relevant figures being the Russian Federation (-100,000) and Canada (-24,000).

***Regarding the establishment of polling stations for postal voting,*** according to the CEC website, 1,994 citizens have shown intention to register. According to the findings of Promo-LEX observers, 1,723 requests were accepted by 17.09.2024, and another 265 are in the process of updating data because of unclarity identified by the CEC. Promo-LEX OM observers attended the presentation of the procedure for verifying applications for registration for postal voting. In the opinion of the OM, the remote identification of voters by digital means is a safe procedure that allows applicants to remedy the identified non-conformities by deadline.

Initially, five polling stations were budgeted for postal voting<sup>44</sup>. The fact that the CEC approved three stations could indicate its higher expectations regarding the applicability of the mechanism. At the same time, for example, 1,087 voters showed their intention to vote by mail in the US, while 7,651 persons voted in the US in the 2021 parliamentary election. Thus, about 14% of “active” voters in the US might vote by

<sup>41</sup> According to Promo-LEX data, there were 571 preliminary registrations for the 2019 parliamentary election, 1,427 for the 2020 presidential election, and 1,106 for the 2021 parliamentary election.

<sup>42</sup> [Moldovans](#) left the Russian Federation en masse. Over the past two years their number has decreased by 3.5 times.

<sup>43</sup> [Reply](#) of the official representative of the Russian Ministry of Foreign Affairs M.V. Zakharova to a question from the media in connection with Chisinau's restriction of the rights of Moldovan voters in Russia.

<sup>44</sup> [CEC Decision](#) no. 2573 on the approval of the estimate of expenses for the partial implementation of postal voting in the election for the office of President of the Republic of Moldova and the republican constitutional referendum of 20 October 2024.

mail, which is an encouraging figure for the beginning of the process. The Promo-LEX OM reiterates its support for the implementation of postal voting and hopes that at the next election this mechanism will be available to all voters abroad.

#### **2.4. Organization of elections for voters on the left bank of the Dniester**

The establishment of separate polling stations for voters from the Transnistrian region of the Republic of Moldova, which is not controlled by constitutional authorities, is regulated by the Electoral Code and the CEC Regulation on the establishment of polling stations for voters from localities on the left bank of the Dniester<sup>45</sup>.

This is the first time that elections for voters in the Transnistrian region are organized according to the new Electoral Code and a new CEC Regulation. The Promo-LEX Association participated in the public consultation of the Electoral Code. Provisions regarding the criteria for the organization of polling stations for the Transnistrian region largely repeat the provisions of the old code, but give more clarity on the applicability of the criterion related to the number of voters who participated in previous elections. According to the new legislation, the rates of participation will be calculated based on the last three elections.

At the same time, Promo-LEX through its opinions sent to both the CEC and the Parliament expressed its disagreement with the text of art. 40 para. (1), "The Central Electoral Commission, (...), may organize polling stations for voters from localities on the left bank of the Dniester. " The Promo-LEX Association said that "it is the obligation of the state of the Republic of Moldova to ensure minimum conditions for its citizens from the Transnistrian region to realize their right to elect." This aspect highlighted by Promo-LEX is also found in the position of experts from the Venice Commission: "Considering the sensitive circumstances for voting of citizens residing in Transnistria, as well as the international standards protecting the universality of the vote for all citizens, the Code (or the CEC regulation) could specify under which circumstances the polling stations for voters residing in Transnistria would not be formed."<sup>46</sup>

The CEC Regulation on the establishment of polling stations for voters from localities on the left bank of the Dniester was approved on 28 May 2024, with sufficient time until the start of the procedures for organizing polling stations, but exceeding the deadlines set by art. 244 para. (3) of the Electoral Code concerning the CEC's obligation to adopt regulatory acts necessary for the organization and conduct of elections within 6 months from the date of entry into force of the Code.

The draft regulation was consulted publicly, including at an event organized by the Commission<sup>47</sup>. The content of the regulation develops most of the provisions of the electoral legislation related to this subject. At the same time, according to the Promo-LEX Opinion addressed to the electoral authority, the CEC could have provided in the regulation more details on how to apply legal criteria when setting up polling stations. The regulation also has no provisions related to the goal set in art. 28 para. (4) lit. e) of the Electoral Code, i.e. "organization and conduct of electoral information and education campaign for voters from localities on the left bank of the Dniester".

**Establishment of polling stations.** The CEC established 30 polling stations within legal deadlines. Although, compared to the 2021 parliamentary election, the number of stations decreased by 11, we believe that given the average number of voters per station and under the conditions of "rationalization" of their location, access to vote will still be ensured.

According to the Electoral Code, for parliamentary and presidential elections and republican referenda, the CEC, at least 35 days before the election date, may organize for voters from localities on the left bank of the Dniester polling stations on the territory of the Republic of Moldova under the constitutional jurisdiction

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<sup>45</sup> [Regulation](#) on the establishment of polling stations for voters from localities on the left bank of the Dniester, approved by CEC Decision no. 2544 of 28 May 2024.

<sup>46</sup> [Joint Opinion](#) on the draft Electoral Code. Approved by the Council for Democratic Elections at its 74th meeting (Venice, 20 October 2022), p. 63.

<sup>47</sup> [Press release](#). The CEC organized public consultations on draft regulations concerning the exercise of the right to vote by citizens abroad and by voters from the left bank of the Dniester.

of the central public administration authorities. The decision on the organization of the respective polling stations was adopted within legal deadlines<sup>48</sup>.

The decision-making process was participatory and mostly transparent, with recommendations that were found in previous Promo-LEX OM reports<sup>49</sup>. The CEC published and consulted publicly at an event, for the first time, a preliminary list of polling stations<sup>50</sup>. Also, the decision on the establishment of polling stations contains not only the list of PSs, but also the description of the main stages in the organization of those PSs, as well as the presentation of the positions expressed by other public authorities involved in the process (Bureau for Reintegration Policies, Ministry of Internal Affairs, Security and Intelligence Service).

However, we shall draw attention that the text of the decision does not contain a direct analysis of how to calculate the number of PSs and distribute them. In addition, certain aspects of the decision-making process, such as, for example, correspondence between the CEC and the Ministry of Internal Affairs or the Security and Intelligence Service, are largely missing on the Commission's website ("Entry/exit documents").

*Table 5. Changes in the number of polling stations established for voters from localities on the left bank of the Dniester (2014-2024)*

<b>Election type</b>	<b>Parliamentary 2014</b>	<b>Presidential 2016</b>	<b>Parliamentary 2019</b>	<b>Presidential 2020</b>	<b>Parliamentary 2021</b>	<b>Presidential, Referendum 2024</b>
<b>Number of PSs</b>	26	30	47	42	41	30
<b>Number of voters who voted</b>	9,261	1st round – 6,964 2nd round – 16,728	NED <sup>51</sup> – 37,257 SMD – 36,696	1st round – 14,711 2nd round – 31,783	28,791	-
<b>Average number of voters per PS</b>	356	1st round – 232 2nd round – 696	NED – 793 SMD – 781	1st round – 350 2nd round – 757	702	-

Over time, on the one hand, we notice a decrease by 11 of the number of PSs reported at the last election, but on the other hand, the average number of voters per PS over the last 10 years did not exceed 800, while up to 3,000 voters were to vote per PS. Given the maximum number of participants in presidential elections (31,783) and the current number of PSs (30), the average per PS would be 1,059 voters, or about 1/3 of the "polling station capacity".

The per-locality analysis of the list of PSs shows that the decrease in the number of PSs in most ATU would not affect the PS "capacity" to receive voters. We believe that only in Dorotcaia village, where at the last election in 2021 about 2,700 voters voted in the two open PSs, both PSs should have been preserved.

In principle, Promo-LEX agrees with the "rationalization" of the number of polling stations for the Transnistrian region. Electoral history has shown that the number of PSs matters not so much as their distribution and location closer to access ways. Moreover, the policy paper prepared by the Association<sup>52</sup> concluded that 28 PSs is a reasonable and sufficient number to ensure the participation of citizens from the left bank of the Dniester in voting, given the participation rates in the last several national elections.

<sup>48</sup> [CEC Decision no. 2867](#) of 14.09.2024 on the organization of polling stations for voters from localities on the left bank of the Dniester for the republican constitutional referendum and election for the office of President of the Republic of Moldova of 20 October 2024.

<sup>49</sup> [Final Report](#). Promo-LEX Observation Mission for the early parliamentary election of 11 July 2021, p. 27.

<sup>50</sup> [CEC press release](#). The issue of organizing polling stations outside the country and for voters from localities on the left bank of the Dniester discussed by the CEC with electoral subjects.

<sup>51</sup> The 2019 parliamentary election was based on the mixed electoral system, respectively the meaning of abbreviations is: NED – national electoral district, and SMD – single member district.

<sup>52</sup> [Policy paper](#). Establishment of polling stations for voters from the left bank of the Dniester. Chisinau: Promo-LEX Association, 2021, p.18.

**Other aspects relevant to the organization of elections for voters from localities on the left bank of the Dniester.** The establishment of polling stations is an important step, but not the only one necessary to ensure the access of citizens from the left bank of the Dniester to a free vote.

Important issues that need to be mentioned in the context of a new national election involving the participation of voters from the Transnistrian region of Moldova include:

- Voters from the Transnistrian region still have no possibility to sign in support of the candidates nominated in the presidential election;
- The organization and conduct of the electoral information and education campaign for voters from the left bank of the Dniester should be a priority for the CEC and the Bureau for Reintegration Policies. We believe that it is absolutely important that public authorities take all possible and necessary measures to ensure the voter's freedom to form an opinion;
- In this election it is still unclear whether and how competitors will manage to campaign in the Transnistrian region. In this context, we have seen no actions of public authorities that would clarify this issue;
- Previous observation experience has shown that one of the main challenges in ensuring the freedom of voting for voters in the Transnistrian region is to counteract and sanction the organized transportation of voters to the polling station on election day, as well as the possibility of corruption in order to determine their choice.



### III. ELECTORAL DISPUTES

#### 3.1. Complaints to the CEC

During the observation period, the Promo-LEX OM found at least eight complaints filed to the CEC:

1. On 04.09.2024, a complaint was filed to the CEC by Marina Tauber, Alexei Lungu, Reghina Apostolova and others, registered by the CEC under no. CEC-7/15906. The object of the complaint was the cancellation of registration of the initiative group in support of the presidential election candidate Maia Sandu. Also, on 05.09.2024, the CEC registered under no. 7/15918 the complaint of Vladimir Voronin, in which he requested to re-examine the application for registration of the initiative group in support of the presidential election candidate Maia Sandu.

According to the CEC decision<sup>53</sup>, the aforementioned complaints were joined in a single procedure and declared inadmissible, including on the grounds that the deadline for their submission was not met.

2. On 06.09.2024, Vasile Bolea filed a complaint to the CEC regarding the use of administrative resources by the mayor of Stauceni town. In Reply no. CEC-8/5852 of 09.09.2024, the CEC noted that the complaint did not claim infringement of a personal right of its author. At the same time, as part of administrative procedure, the CEC requested the opinion of the local public authority and of the initiative group involved in the alleged infringement. Consequently, the CEC found that there was no involvement of town hall officials in activities carried out during working hours, nor offering of public spaces on preferential terms, and the collection of signatures was carried out outside working hours.

3. On 09.09.2024, an appeal was filed to the CEC<sup>54</sup> by Vasile Bolea, registered under no. CEC-7/16011. The object of the appeal was electoral campaigning carried out by PAS. In Reply no. CEC-8/5909 of 16.09.2024<sup>55</sup>, the CEC declared the appeal inadmissible, reasoning with the same criterion as in case no. 2 – lack of violation of the appellant's rights.

4. On 11.09.2024, the CEC registered under no. 7/16065 the appeal filed by Vasile Bolea, in which he claimed alleged use of administrative resources by Maia Sandu. The CEC mentioned on its website that it settled the appeal in question through Act no. CEC-8/5889 of 13.09.2024, which said, like in case no. 2, that the appeal did not claim violation of a personal right of the author, referring to art. 17 of the Administrative Code. However, the CEC concluded that, "for a message to be qualified electoral campaigning in the context referred to, it should contain an explicit urge to vote for one of the options in the referendum, thus promoting the presence of citizens at the vote, while the spot met the characteristics of messages of public interest."

We shall mention that in this case the CEC did not settle the appeal, giving only an assessment on the lack of an injured right of the appellant, while the solution is unclear – whether it is admission, rejection, inadmissibility of the appeal, etc.

5. On 12.09.2024, the CEC registered under no. 7/16093 the complaint filed by Adela Gutu, head of the IG in support of the candidate Irina Vlah. The complaint challenged the actions of the National Public Security Inspectorate (NPSI), which allegedly delayed the examination of the application for the coordination of the placement of advertising on special vehicles equipped for advertising purposes, submitted by the head of the IG. According to the complaint, NPSI suspended the examination of the application submitted by the head of the IG Adela Gutu until a clarification from the CEC.

The CEC settled the complaint through Act no. CEC-8/5894 of 14.09.2024, stating that the nominated candidate Irina Vlah has the right to prepare and disseminate electoral advertising materials, and not Adela Gutu, the head of the IG.

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<sup>53</sup> [CEC Decision](#) no. 2832 of 07.09.2024 on Complaint no. CEC-7/15906 of 4 September 2024 filed by a group of voters and Complaint no. CEC-7/15918 of 5 September 2024 filed by Mr. Vladimir Voronin, chairman of the Party of Communists of the Republic of Moldova

<sup>54</sup> [Appeal](#) filed by Vasile Bolea against PAS

<sup>55</sup> [Reply](#) no. CEC-8/5909 of 16.09.2024 to Vasile Bolea's appeal of 09.09.2024



6. On 17.09.2024, Vasile Bolea filed to the CEC an appeal regarding the use of administrative resources, manifested by the alleged forcing of local elected officials by the central public authorities to sign joint declarations in support of the constitutional referendum of 20.10.2024. At the time of writing this Report, there is no information on the settlement of this appeal on the CEC website.

7. On 17.09.2024, Vasile Bolea also filed another appeal regarding the use of administrative resources, manifested by the Government's promotion of a campaign to support the republican referendum through various methods of online and outdoor advertising, leaflets, etc. He noted that leaflets with the title "Europe for you" are distributed in the public space and that in reality these messages are to promote the republican constitutional referendum. At the time of writing this Report, there is no information on the settlement of this appeal on the CEC website.

8. We shall also mention that in Report no. 1 of 20.08.2024<sup>56</sup>, the Promo-LEX OM mentioned a complaint filed by the MP Vlad Batrincea, in which he claimed the use of administrative resources in the context of promoting the constitutional referendum, which at the time of publication of the Promo-LEX report was not settled.

On this matter, according to Reply no. CEC-8/5505 of 02.08.2024<sup>57</sup>, the CEC mentions that it addressed the Information Technology and Cyber Security Service, which communicated that each user through the settings of the MoldSign Desktop Suite app can opt out of the application of the inscription "EUROPEAN MOLDOVA" on the electronic signature imprint. Therefore, the CEC concluded that the user can choose whether or not to use the inscription in the electronic signature imprint, which indicates the absence of the infringements reported.

In the context of the cases examined above, the Promo-LEX OM points out that some complaints and CEC replies are not found on the institution's website. For this reason, we recommend the central electoral authority to regularly update its website, including the section dedicated to appeals and settlement acts, during the election period. We shall draw attention that under the heading "Presidential election 2024" on the CEC website there is a section dedicated to appeals, which is not being updated. The same applies to the heading "Constitutional Referendum 2024".

At the same time, taking into account the fact that the CEC replies analyzed above are issued in accordance with the Administrative Code, we recommend the central electoral authority to make use of the provisions mandatory for public authorities, namely to inform the authors of complaints about ways of appeal, because according to art. 120 para. (1) lit. h) of the Administrative Code, an individual administrative act issued or confirmed in writing must contain information on the exercise of appeals.

We shall also draw attention that, according to the Code of Good Practice in Electoral Matters<sup>58</sup>, the appeal procedure should be as short as possible, at least with regard to decisions issued before elections. In this respect, the Promo-LEX OM found that the period of examination of these complaints and appeals ranged from 2 to 7 days. We shall remind that according to art. 100 para. (1) and (9) of the Electoral Code, appeals are examined within 3 days of submission, with the possibility of extension by 2 days in complex cases.

Analyzing the appeals examined by the CEC, the Promo-LEX OM established only one case that exceeded this deadline – the appeal filed by Vasile Bolea against PAS registered under no. CEC-7/16011, which was examined in 7 days.

Based on the above-mentioned principles, namely (1) celerity of procedures and (2) the period in which appeals are filed, we consider that the CEC is to settle the appeals filed during the election period, mainly according to the Electoral Code, which is *lex specialis* in relation to the Administrative Code.

### 3.2. Appeals filed to courts

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<sup>56</sup> [Report](#) no. 1 of Promo-LEX OM of 20.08.2024;

<sup>57</sup> [The CEC reply](#) to the complaint of MP Vlad Batrincea

<sup>58</sup> [The Code of Good Practice in Electoral Matters](#). Guidelines and explanatory report. Adopted by the European Commission for Democracy through Law at its 52nd plenary session (Venice, 18-19 October 2002), p. 32.

During the reference period, at least four appeals on electoral matters against CEC decisions were filed to courts:

1. On 26.08.2024, the Chisinau Court of Appeal registered the action filed by Ludmila Corsun against the CEC decision on the refusal to register the IG in support of Ludmila Corsun for the reason of her not knowing the Romanian language.

Subsequently, on 28.08.2024, the court rejected the action filed<sup>59</sup>. In its judgment, the court reiterated the conclusions of the CEC, adding that at the court hearing Ludmila Corsun also spoke in Russian, being assisted by an interpreter. Also, at the court hearing she said that she understood 80% of the questions asked by the court. At the same time, it was mentioned that, according to the extract from Minutes no. 277 of the CEC meeting of 24.08.2023, it was noted that at the meeting Corsun Ludmila spoke mainly in Russian, motivating that she was in the process of studying the Romanian language, asking the CEC members for a period of one month in which she would manage to learn Romanian.

According to art. 78 para. (2) of the Constitution, a citizen with the right to vote who reached the age of 40 years old, lived or lives permanently on the territory of the Republic of Moldova for at least 10 years, and speaks the Romanian language may be elected President of the Republic of Moldova.

On 03.09.2024, the Supreme Court of Justice declared inadmissible<sup>60</sup> the appeal filed by Ludmila Corsun.

In the context of this case, the Promo-LEX OM draws attention to the lack of a regulatory framework that would provide for the procedure for verifying Romanian language proficiency of candidates for the office of President.

2. On 28.08.2024, the Chisinau Court of Appeal registered the action filed by Valeriu Plesca, Iurie Cazacu, and ESDP against the CEC decision on the refusal to register the initiative group in support of the candidate Valeriu Plesca. We shall remind that the CEC refused the registration of the IG for the reason that at the time of submitting documents for the registration of the IG in support of the candidate Valeriu Plesca, the latter still held the position of chairman of a party other than the ESDP.

On 29.08.2024, the court adopted a decision by which it rejected the action as unfounded<sup>61</sup>. The court noted that at the time of filing the application for registration of the initiative group in support of the candidate Valeriu Plesca for President, the latter held the position of chairman of the political party Christian-Social Union of Moldova, and nominating as a candidate the leader of another political entity is inadmissible.

Also, the Chisinau Court of Appeal held that the fact that a party nominated as a candidate for President a citizen who is a member of another party means in fact the "joint participation" of these parties in the election.

Moreover, the court noted in support of the adopted solution the findings of the Constitutional Court in judgment no. 29 of 09.12.2014, pt. 97, according to which "the court finds that participation in election on a joint list of the Party of Socialists of the Republic of Moldova and the United Moldova Party represents in fact a camouflaged electoral bloc, through which they tried to avoid the minimum representation threshold of 9%, established by art. 86 para. (2) lit. b) of the Electoral Code, and obtain the application of the 6% threshold, valid for political parties."

On 06.09.2024, the Supreme Court of Justice declared inadmissible<sup>62</sup> the appeal filed by Valeriu Plesca, Iurie Cazacu, and the European Social Democratic Party.

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<sup>59</sup> [Judgment](#) of the Chisinau Court of Appeal of 28.08.2024 in Ludmila Corsun v. CEC

<sup>60</sup> [Conclusion](#) of the Supreme Court of Justice of 06.09.2024 in Ludmila Corsun v. CEC

<sup>61</sup> [Judgment](#) of the Chisinau Court of Appeal of 29.08.2024 in the case Plesca Valeriu, Cazacu Iurie, and ESDP v. the CEC

<sup>62</sup> [Conclusion](#) of the Supreme Court of Justice of 06.09.2024 in the case Plesca Valeriu, Cazacu Iurie, and ESDP v. the CEC

3. On 01.09.2024, the Chisinau Court of Appeal registered the action filed by Vasile Bolea against the CEC decision on the refusal to register the IG in support of Vasile Bolea. On 10.09.2024, the court decided to dismiss the action as unfounded<sup>63</sup>.

Thus, the Chisinau Court of Appeal was in solidarity with the CEC's position and noted that it is certain that the applicant is a member of the political bureau of the Revival Party and participates in the demonstrations organized by it, so his intention to initiate his registration as an independent candidate is obviously camouflaged, the court concludes.

The Promo-LEX OM notes that the main arguments of the court regarding the rejection of the action are practically the same as those held by the CEC, and in these circumstances it is not clear why the court exceeded the deadline for consideration of the appeal by 4 days. In this regard, we shall remind that according to art. 101 para. (1) and (9) of the Electoral Code, during the election period competent authorities shall examine appeals within **3 days** from filing, but no later than election day. When examining electoral disputes, the courts apply the same deadline, including in appeal proceedings. For justified reasons related to the complexity of the object of the appeal and/or the conduct of the subjects of the appeal, the general deadline may be extended by no more than 2 days [...].

On 13.09.2024, the Supreme Court of Justice declared inadmissible<sup>64</sup> the appeal filed by Vasile Bolea on 11.09.2024 against the judgment of the Chisinau Court of Appeal.

4. On 05.09.2024, the Chisinau Court of Appeal registered the action filed by Avelin Tabarcea against the CEC letter by which the CEC informed him that the draft decision on registration of the initiative group did not meet the required number of votes and that the lack of a favorable decision means refusal of the application for registration of the initiative group.

Subsequently, on 12.09.2024, the court partially upheld the action filed<sup>65</sup>. The court held that the CEC, as a public authority, was obliged to settle the appellant's application by a reasoned decision and not a letter of reply. Thus, the court found that by these omissions the CEC admitted a serious procedural defect and obliged the CEC to re-examine Tabarcea Avelin's application and to issue a reasoned decision on that application.

As a result, on 14.09.2024, in order to enforce the judgment of the Chisinau Court of Appeal, the CEC adopted Decision no. 2865<sup>66</sup>, by which it refused the registration of the initiative group in support of the candidate Avelin Tabarcea, the main reason being that there is a direct political link between Avelin Tabarcea, as a candidate in several elections from political parties in the sphere of affiliation with the Shor Party, declared unconstitutional, and parties from the electoral bloc whose registration was refused – Victory PB.

Likewise, we shall note that on 17.09.2024, the Supreme Court of Justice declared inadmissible<sup>67</sup> the appeal filed by Avelin Tabarcea on 13.09.2024 against the judgment of the Chisinau Court of Appeal of 12.09.2024.

We shall also draw attention to the fact that on 18.09.2024, the Chisinau Court of Appeal rejected as unfounded<sup>68</sup> the action filed by Avelin Tabarcea against judgment no. 2865 of 14.09.2024 on the execution of the judgment of the Chisinau Court of Appeal of 12 September 2024.

In the part related to the term of examination of the actions, the Promo-LEX OM found that during the observation period it varied between 2 and 13 days. We reiterate that the term of examination of appeals, both for electoral bodies and for courts, is 3 days from filing the appeal, with the possibility of extending this term by 2 days. Analyzing the decisions listed above, we found four cases when those terms were exceeded.

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<sup>63</sup> [Judgment](#) of Chisinau Court of Appeal of 10.09.2024 in the case Vasile Bolea v. the CEC

<sup>64</sup> [Conclusion on inadmissibility](#) of the Supreme Court of Justice in the case of Vasile Bolea v. the CEC

<sup>65</sup> [Judgment](#) of the Chisinau Court of Appeal of 12.09.2024 in the case Avelin Tabarcea v. the CEC;

<sup>66</sup> [CEC Decision](#) no. 2865 of 14.09.2024 on the execution of the judgment of the Chisinau Court of Appeal of 12 September 2024;

<sup>67</sup> [Conclusion](#) of the Supreme Court of Justice of 17.09.2024 in the case Avelin Tabarcea v. the CEC;

<sup>68</sup> [The operative part](#) of the judgment of the Chisinau Court of Appeal of 18.09.2024 in the case Avelin Tabarcea v. the CEC;

### **3.3. Activity of law enforcement bodies**

On 09.09.2024, the Anticorruption Prosecutor's Office and the National Inspectorate for Investigations conducted searches<sup>69</sup> as part of a criminal case on the illegal financing of political parties, initiative groups, and electoral competitors, committed in large proportions, and also money laundering committed by an organized criminal group in particularly large proportions.

The criminal investigations body noted that the recipients of the money are members of the primary territorial organizations of some political parties in the country, paid monthly from obscure sources, not reflected in the accounting records for activities performed in the context of the upcoming presidential election, including for participation in rallies, flashmobs, and protest actions. In the video materials published by law enforcement bodies one can see the attributes of the Victory PB.

Subsequently, on 13.09.2024, the Anticorruption Prosecutor's Office and the National Inspectorate for Investigations conducted other criminal prosecution actions<sup>70</sup> as part of a criminal case on illegal financing of political parties, initiative groups, and electoral competitors, committed in large proportions, and also money laundering committed by an organized criminal group in particularly large proportions. Draft documents, bank cards on which money were transferred, mobile phones, and other items relevant for prosecution were collected during these actions.

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<sup>69</sup> [Press release](#) published by the Anticorruption Prosecutor's Office;

<sup>70</sup> [Press release](#) published by the Anticorruption Prosecutor's Office;

## IV. NOMINATION AND REGISTRATION OF ELECTORAL COMPETITORS

### 4.1. Registration of initiative groups in support of candidates for the office of President

According to pt. 28 of the Calendar program, the period of nomination and registration of candidates for the office of President began on 21 August and ends 30 days before the election, on 20 September 2024, inclusive. The reception of documents for registration of initiative groups (IG) in support of candidates took place between 21 and 31 August 2024.

During this period, 23 applications were submitted to the CEC to register IGs in support of 19 candidates for the office of President, seven of whom were nominated by political parties, one candidate nominated by Together EB, and 11 independent candidates. Repeated applications for registration of IGs were submitted in support of Vasile Tarlev, Ludmila Corsun, Valentin Borodachi, and Vasile Bolea.

Table no. 6. Applications for registration of IGs

No.	Nominated candidate	Political party / independent	Date of submission	Date of examination	CEC decision on examination	Number of IG members	Status of examination
1	Ion Chicu	PDCM	21.08.2024	23.08.2024	<a href="#">CEC Decision no. 2721 of 23.08.2024</a>	98	Registered
2	Vasile Tarlev	Independent	21.08.2024	23.08.2024	<a href="#">CEC Decision no. 2722 of 23.08.2024</a>	100	Registered
				29.08.2024 (re-examination)	<a href="#">CEC Decision no. 2752 of 29.09.2024</a>	-	Registration annulled
3		FMP	31.08.2024	03.09.2024	<a href="#">CEC Decision no. 2812 of 03.09.2024</a>	87	Registered
4	Alexandr Stoianoglo	PSRM	21.08.2024	23.08.2024	<a href="#">CEC Decision no. 2724 of 23.08.2024</a>	100	Registered
5	Octavian Țicu	Together EB	21.08.2024	23.08.2024	<a href="#">CEC Decision no. 2725 of 23.08.2024</a>	88	Registered
6	Valeriu Pleșca	ESDP	21.08.2024	24.08.2024	<a href="#">CEC Decision no. 2733 of 24.08.2024</a>	-	Rejected
7	Tudor Ulianovschi	Independent	22.08.2024	24.08.2024	<a href="#">CEC Decision no. 2734 of 24.08.2024</a>	66	Registered
8	Renato Usatii	OP	22.08.2024	24.08.2024	<a href="#">CEC Decision no. 2735 of 24.08.2024</a>	100	Registered
9	Irina Vlah	Independent	22.08.2024	24.08.2024	<a href="#">CEC Decision no. 2736 of 24.08.2024</a>	60	Registered
10	Igor Munteanu	CUB	22.08.2024	24.08.2024	<a href="#">CEC Decision no. 2737 of 24.08.2024</a>	95	Registered
11	Maia Sandu	PAS	22.08.2024	24.08.2024	<a href="#">CEC Decision no. 2738 of 24.08.2024</a>	100	Registered
12	Ludmila Corsun	Independent	22.08.2024	24.08.2024	<a href="#">CEC Decision no. 2739 of 24.08.2024</a>	-	Rejected
13		Independent	31.08.2024	31.08.2024	-	-	<a href="#">Examination rejected</a>
14	Victoria Furtuna	Independent	23.08.2024	26.08.2024	<a href="#">CEC Decision no. 2746 of 26.08.2024</a>	42	Registered
15	Valentin Borodachi	Independent	24.08.2024	<a href="#">Procedure terminated</a>	-	-	Application withdrawn <sup>71</sup>
16		Independent	31.08.2024	02.09.2024	-	-	Rejected
17	Andrei Nastase	Independent	24.08.2024	26.08.2024	<a href="#">CEC Decision no. 2747 of 26.08.2024</a>	90	Registered
18	Natalia Morari	Independent	25.08.2024	27.08.2024	<a href="#">CEC Decision no. 2749 of 27.08.2024</a>	99	Registered

<sup>71</sup> According to data from the CEC correspondence, the file submitted by V. Borodachi was incomplete and the Commission requested to fill in the deficiencies. Subsequently, on 25 August, the candidate withdrew his application for registration.

19	<b>Alexandru Arseni</b>	Independent	26.08.2024	29.08.2024	<a href="#">CEC Decision no. 2753 of 29.08.2024</a>	26	Registered
20	<b>Vasile Bolea</b>	Independent	26.08.2024	29.08.2024	<a href="#">CEC Decision no. 2754 of 29.08.2024</a>	-	Rejected
21		Independent	30.08.2024	31.08.2024	-	-	<a href="#">Examination rejected</a>
22	<b>Avelin Tabarcea</b>	Independent	31.08.2024	02.09.2024	-	-	Rejected
				14.09.2024 (re-examination)	<a href="#">CEC Decision no. 2865 of 14.09.2024</a>	-	Rejected
23	<b>Oleg Oleinic</b>	Independent	31.08.2024	03.09.2024	-	-	Examination rejected

As a result of examination by the CEC of applications and documents submitted by candidates for the office of President, 13 IGs were registered: six for independent candidates, six for candidates nominated by political parties, and one candidate nominated by Together EB. All applications for registration of IGs were examined within the term prescribed by art. 140 para. (4) of the Electoral Code – 3 days from the date of submission of the list of members.

From the gender perspective, four IGs (30%) were registered in this election in support of women candidates: Irina Vlah (IC), Maia Sandu (PAS), Victoria Furtuna (IC), and Natalia Morari (IC). Therefore, compared to the 2020 presidential election, we deduce an increase in the representativeness of women as candidates for president, from 15% to 30%.

#### 4.1.1. Annulment of registration of an initiative group

Eight days after the registration of the initiative group, on 29 August 2024, the CEC resumed the administrative procedure for re-examination of the registration application of 21 August 2024 from the IG in support of Vasile Tarlev as an independent candidate for the office of President. During re-examination, it was found that at the time of submission of the IG's application for registration Vasile Tarlev was also chairman of the Future of Moldova Party (hereinafter FMP), and the candidate used the political platform of the FMP, as the collection of signatures took place in the area where the FMP banner was displayed.

Therefore, the CEC found that the factual circumstances prove that the nomination of Vasile Tarlev as an independent candidate for the office of President, supported by citizens' assembly, was formal and declarative and contradicts the conditions for the nomination of candidate for the office of President by citizens' assembly, provided in pt. 22-26, 28 of the Regulation on the establishment and registration of initiative groups, preparation, presentation, and verification of signatures collecting lists, approved by CEC Decision no. 1166/2023 (hereinafter Regulation on registration of initiative groups).

As a result, the Commission annulled the CEC Decision no. 2722 of 23 August 2024 on the application for registration of the IG in support of the candidate Vasile Tarlev for the office of President of the Republic of Moldova, and rejected the application. On 2 September 2024, the signatures collecting lists were returned to the Commission, of which 754 were completed.

The application for registration of the IG in support of the candidate Vasile Tarlev, already nominated by the FMP, being submitted repeatedly, on 3 September 2024 the initiative group was registered.

Given that the term for collecting signatures is limited and starts with the registration of the IG and the issuance of signatures collecting lists by the CEC, the Promo-LEX OM notes that the re-examination of the IG registration application already in the process of collecting signatures can limit the candidate's right to be in equal conditions with other candidates. Moreover, we shall draw attention that in presidential elections the conditions for registration of electoral competitors are the same for candidates nominated by political parties and for those nominated by citizens (creation of the initiative group, collection of signatures). At the same time, in order to ensure the correct conduct of the electoral process, the nominated candidates must comply with legal rules and not make formal statements, including on the nomination as independent candidate, when there is support from one or several political parties.



As regards the resumption of administrative procedure, the Promo-LEX OM notes that the legal ground indicated by the CEC to support its position was art. 144 of the Administrative Code, as follows: “In this regard, according to para. (1) and (6) of art. 144 of the Administrative Code, a favorable illegal individual administrative act may be withdrawn in whole or in part with effect for the future or the past, even after it has become indisputable, if the public authority learns of facts justifying the withdrawal of a favorable illegal individual administrative act.”

In these circumstances, the CEC’s position regarding the assessment of the administrative act issued on 23.08.2024 as illegal is not clear, because this fact emerges from the indication by the electoral public authority of the rule provided in art. 144 of the Administrative Code. We shall remind that the article concerned provides for the procedure of withdrawing administrative acts under the essential condition that they are illegal.

#### **4.1.2. Refusals of registration and examination of applications for registration of IGs**

In the process of examining applications for registration of IGs, the Commission approved three decisions on rejection (Valeriu Plesca, Ludmila Corsun, Vasile Bolea), and draft decisions on registration for other two applications (Avelin Tabarcea, Valentin Borodachi) did not obtain the required number of votes.

In the case of applications for registration of IGs in support of Valentin Borodachi and Avelin Tabarcea as independent candidates, the reason invoked not to support registration was failure to meet the condition of political non-affiliation. Following debates at the CEC meeting (2 September 2024), it was mentioned that in the 2023 general local elections, Avelin Tabarcea was nominated as a candidate for the position of district councilor in Briceni from the Chance Party, and Valentin Borodachi was nominated as a candidate for mayor of Briceni from the political party PACE. According to statements of Valentin Borodachi, he was excluded from the list of party members in January 2024.

On 5 September 2024, Avelin Tabarcea filed an action to the Chisinau Court of Appeal, requesting Letter no. CEC-8/5810<sup>72</sup> of 4 September 2024 to be cancelled and the Commission to be obliged to register the IG in support of the candidate for the office of President. By the judgment of the Chisinau Court of Appeal of 12 September 2024 (case no. 3-112/2024), the action was partially admitted and the above-mentioned letter was annulled, the CEC being obliged to re-examine Avelin Tabarcea’s application of 31 August 2024 regarding the registration of the IG in support of the candidate for the office of President and to issue a reasoned decision on it.

Thus, at the CEC meeting of 14 September 2024, the CEC re-examined the application for registration of the IG. Similarly to the arguments invoked in the previous examination of the application, the Commission attests a direct political link between Avelin Tabarcea as a candidate in several elections from political parties in the sphere of affiliation with the Shor Party (declared unconstitutional) and parties from the electoral bloc whose registration was refused (Victory PB). Thus, the CEC repeatedly noted that Avelin Tabarcea’s aspiration to the status of independent candidate with affiliation with a political party testifies to the incompatibility with the status of independent candidate, refusing registration of the initiative group in his support.

The Promo-LEX OM points out that there were no cases of refusal to register an IG on the grounds of political affiliation of independent candidates in previous elections. However, we shall remind that Promo-LEX has previously found cases of support by political parties of independent candidates or of candidates nominated by other political parties: support of independent candidate Igor Dodon by PSRM in the 2020 presidential election<sup>73</sup>, support of PAS candidate Maia Sandu by PPPDA (after the withdrawal of A. Nastase) in the 2016 presidential election<sup>74</sup>, and in the new parliamentary election for the Hincesti electoral district

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<sup>72</sup> [Letter no. CEC-8/5810](#) of 4 September 2024, by which the CEC informs about the refusal to examine the application for registration of the IG

<sup>73</sup> [Report no. 4](#) of Promo-LEX OM on observation of election for the office of President of the Republic of Moldova of 1 November 2020, p. 13

<sup>74</sup> [Report no. 4](#) of Promo-LEX OM on observation of election for the office of President of the Republic of Moldova of 30 October 2016, p.9.



of 15 March 2020, when the independent candidate Grigore Cobzac was supported by PUN and PPPDA<sup>75</sup>. In this respect, although it was recommended to the legislature to regulate these situations in order to avoid deficient reporting of electoral campaign financing and the involvement in the electoral campaign of political parties that do not participate in elections, such regulations are still missing in the current electoral legislation.

On 31 August 2024, the CEC received at its electronic address the application for registration of the IG in support of Oleg Oleinic. According to the CEC's reply, sent to the applicant on 3 September 2024, the application did not meet legal conditions to be examined, namely: the documents for registration of the initiative group are to be submitted personally by the candidate, and the application and the set of documents presented were not signed by hand or with electronic signature.

**IG in support of Valeriu Plesca, nominated by ESDP.** On 24 August 2024, the CEC examined the application for registration of the IG in support of the candidate Valeriu Plesca for the office of President, nominated by the ESDP, and found the following deficiencies: the lack of quorum necessary to declare the meeting deliberative (according to the provisions of the party statute); the number of IG members following their verification fell below the minimum number required by the legislation; at the time of submission of documents for registration of the IG, the nominated candidate was the chairman of a party other than the ESDP.

Likewise, the CEC retained the conclusions set out in pt. 90-97 of the Constitutional Court Decision no. 29/2014<sup>76</sup> confirming the results of the election for the Parliament of the Republic of Moldova of 30 November 2014 and validating the mandates of elected MPs, according to which it is inadmissible to create and operate camouflaged electoral blocs, i.e. to nominate a party leader from another political entity. As a result, by Decision no. 2733 of 24 August 2024, the CEC rejected the application for registration of the IG.

**IG in support of the independent candidate Ludmila Corsun.** On 22 August 2024, in the process of receiving the application for registration of the IG in support of the independent candidate Ludmila Corsun, when the Romanian language proficiency was verified according to pt. 29 of the Regulation on registration of initiative groups, the reception and verification commission found that the candidate did not meet this requirement.

At the CEC meeting of 24 August 2024, during the examination of the subject, the CEC members asked questions to the candidate to verify proficiency in the Romanian language. Following the answers provided, the Commission found that the requirement set out in art. 78 para. (2) of the Constitution and art. 136 para. (2) of the Electoral Code was not met. Thus, the CEC rejected the application for registration of the IG by Decision no. 2739 of 24 August 2024.

We shall mention that subsequently, on 31 August 2024, the application for registration of the IG in support of Ludmila Corsun was filed to the CEC repeatedly. Taking into account that the repeated application was filed under the same circumstances as assessed by CEC Decision no. 2739/2024, the CEC refused to examine it, pursuant to the provisions of art. 80 para. (3) of the Administrative Code no. 116/2018.

We shall remind that with regard to language proficiency requirements for a candidate for the office of President, the Venice Commission and the ODIHR have previously recommended to "provide that the testing of language [...] be reasonable, objective, verifiable, and subject to effective review." By approving the new Electoral Code, in order to integrate these recommendations, reference was made to art. 18 para. (1) of the Law on citizenship of the Republic of Moldova no. 1024/2000, which outlines the general criteria for language fluency.

According to the Joint Opinion<sup>77</sup> (of the Venice Commission and OSCE/ODIHR) on the draft Electoral Code, it remains unclear how verification based on these criteria will be carried out procedurally (whether language certificates will be collected or testing will be organized, and if so, under which conditions). Thus,

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<sup>75</sup> [Final report](#) of Promo-LEX OM on observation of the new parliamentary election of 15 March 2020.

<sup>76</sup> [Constitutional Court Decision no. 29/2014](#) confirming the results of the election for the Parliament of the Republic of Moldova of 30 November 2014 and validating the mandates of elected MPs.

<sup>77</sup> [Joint Opinion](#) on the draft Electoral Code, 24 October 2022, p. 29

the verification mechanism must be clearly laid down to ensure objective and uniform application so as to avoid arbitrary disqualification. The amended article fails to address previous concerns, and the previous recommendation remains valid.

Art. 136 para. (2) of the Electoral Code provides that the procedure for assessing the Romanian language proficiency of a candidate for the office of President of the Republic of Moldova shall be established by decision of the CEC. The CEC did not adopt a decision in this respect, the evaluation procedure being described in pt. 29 of the Regulation on registration of initiative groups, which stipulates that the verification of a candidate's proficiency in the Romanian language consists in completing the declaration of consent to be supported as a candidate and in answering questions from members of the reception commission at the time of submission of the application for registration of the IG.

**IG in support of the independent candidate Vasile Bolea.** On 29 August 2024, having examined the application and the submitted documents, the CEC found that Vasile Bolea's current status as a member of the Revival Party is incompatible with the status of independent candidate. During the debates, Vasile Bolea invoked the fact that on 25 August he submitted an application for resignation from membership in the party and in its governing bodies.

Subsequently, on 30 August 2024, an application for registration of the IG in support of Vasile Bolea as an independent candidate was repeatedly submitted to the CEC, accompanied by the application for his resignation from the party. According to the CEC reply sent to the applicant, registered under no. CEC-8/5772 of 31 August 2024, the repeated application did not contain new elements referring to the status of independent candidate that had not been made known on 29 August, when the CEC refused to register the IG on the grounds of failure to meet the condition of political non-affiliation. Thus, the CEC rejected the examination of the application under the provisions of art. 80 para. (3) of the Administrative Code no. 116/2018.

#### **4.2. Registration of candidates for the office of President**

The submission of documents, including signatures collecting lists, with a view to registering candidates for the office of President is carried out until 20 September 2024, inclusive. Signatures collecting lists were issued at the time of registration of the IGs in support of candidates. For this election, the CEC launched the information subsystem "Electronic signatures collecting list" (ISS ESCL). By CEC Decision<sup>78</sup> no. 2692 of 12 August 2024, the CEC provided that the collection of signatures to support candidates nominated for the office of President will be allowed also through the ISS ESCL<sup>79</sup>, that is, the IG will present on paper the signatures collecting lists with the minimum number of 15,000 valid signatures of supporters, provided in art. 139 para. (1) of the Electoral Code, and the difference up to 25,000 signatures can be collected through the subsystem.

Also, by the same decision, the CEC approved the Instruction on the implementation of this subsystem. The instruction was developed in order to establish the testing of the ISS ESCL for the presidential election of 20 October this year and to regulate the procedure for processing and totaling signatures collected through it. The process of collecting signatures through the ISS ESCL began on the date when the CEC issued to the collectors credentials and signatures collecting lists and shall cease once each candidate's signatures collecting lists on paper are received.

Therefore, during the monitored period, out of the 13 IGs that obtained signatures collecting lists, 9 candidates submitted to the CEC signatures collecting lists and registration documents, and 4 of them have been registered as electoral competitors.

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<sup>78</sup> [CEC Decision no. 2692](#) of 12 August 2024 on some peculiarities of organization and conduct of the election for the office of President of the Republic of Moldova and of the republican constitutional referendum, Annex 12

<sup>79</sup> [Information subsystem "Electronic signatures collecting list"](#)

Table no. 7. Submission of documents for registration

No.	Candidate	PP / IC	IG registration date	SCL submission date	No. of validated signatures	No. 2nd level ATUs	Date of examination	Status
1.	Alexandr Stoianoglo	PSRM	23.08.2024	26.08.2024	17,925	27	<a href="#">CEC Decision no. 2802 of 02.09.2024</a>	Registered
2.	Maia Sandu	PAS	24.08.2024	06.09.2024	18,580	31	<a href="#">CEC Decision no. 2843 of 12.09.2024</a>	Registered
3.	Renato Usatii	OP	24.08.2024	12.09.2024	16,353	26	<a href="#">CEC Decision no. 2890 of 18.09.2024</a>	Registered
4.	Vasile Tarlev	FMP	03.09.2024	13.09.2024	16,338	26	<a href="#">CEC Decision no. 2891 of 18.09.2024</a>	Registered
5.	Irina Vlah	IC	24.08.2024	16.09.2024	-	-	-	Examination
6.	Ion Chicu	PDCM	23.08.2024	16.09.2024	-	-	-	Examination
7.	Andrei Nastase	IC	26.08.2024	18.09.2024	-	-	-	Examination
8.	Victoria Furtuna	IC	26.08.2024	19.09.2024	-	-	-	Examination
9.	Octavian Țicu	Together EB	23.08.2024	19.09.2024	-	-	-	Examination
...								

The documents of 5 candidates are in the process of examination, and 4 others are still to present signatures collecting lists and documents for registration.

#### 4.3. Registration of participants in the republican constitutional referendum

In accordance with legal provisions and pt. 42 of the Calendar program, between 21 August and 20 September 2024, political parties and electoral blocs may submit to the CEC documents for registration as participants in the referendum.

During the monitored period, 14 applications for registration as a participant were submitted to the CEC by 13 political parties and the Together EB.

Table no. 8. Applications for registration as a participant in the referendum

No.	Participant	Option	Documents submission date	Status	CEC Decision examination date
1.	PCRM	NO	21.08.2024	Registered	<a href="#">CEC Decision no. 2723 of 23.08.2024</a>
2.	EGP	YES	26.08.2024	Registered	<a href="#">CEC Decision no. 2755 of 29.08.2024</a>
3.	RMM	YES	29.08.2024	Registered	<a href="#">CEC Decision no. 2759 of 31.08.2024</a>

4.	ALDE	YES	30.08.2024	Registered	<a href="#">CEC Decision no. 2803 of 02.09.2024</a>
5.	RP	NO	03.09.2024	Registered	<a href="#">CEC Decision no. 2823 of 06.09.2024</a>
6.	ChP	NO	04.09.2024	Registered	<a href="#">CEC Decision no. 2829 of 07.09.2024</a>
				Revoked	<a href="#">CEC Decision no. 2864 of 14.09.2024</a>
7.	ESDP	YES	05.09.2024	Rejected	<a href="#">CEC Decision no. 2830 of 07.09.2024</a>
8.	CUB	YES	10.09.2024	Registered	<a href="#">CEC Decision no. 2844 of 12.09.2024</a>
9.	Together EB	YES	10.09.2024	Registered	<a href="#">CEC Decision no. 2845 of 12.09.2024</a>
10.	PAS	YES	10.09.2024	Registered	<a href="#">CEC Decision no. 2846 of 12.09.2024</a>
11.	MAN	YES	13.09.2024	Registered	<a href="#">CEC Decision no. 2873 of 16.09.2024</a>
12.	PPDA	YES	17.09.2024	Registered	<a href="#">CEC Decision no. 2905 of 19.09.2024</a>
13.	PACE	YES	18.09.2024	Under examination	-
14.	AUR	YES	19.09.2024	Under examination	-
....					

Following the examination of applications and sets of documents, the CEC registered 11 participants in the referendum: eight participants with the YES option and three with the NO option. All applications were examined within 3 days, a deadline set in art. 200 para. (2) of the Electoral Code.

**Refusal of registration.** On 7 September, the CEC examined the ESDP's application for registration as a participant and found the lack of the necessary quorum to declare deliberative the meeting of the party's national political council (67 members out of a total of 140 participated) where it was decided to participate in the referendum. Thus, the Commission rejected the application for registration.

**Re-examination of application.** On 7 September, the CEC registered the Chance Party (ChP) as a participant in the referendum with the reservation of its revocation in case an enforceable court decision is issued limiting the activity of the applicant. This reservation was imposed in the context of CEC Decision no. 2240<sup>80</sup> of 14 February 2024, which found violation by the party of obligations related to the control of ChP's financial activity, for which the Commission notified the Ministry of Justice in order to initiate the procedure for limiting its activity under art. 21 para. (2) and (3) of Law no. 294/2007 on political parties.

As a result of the CEC's referral to the Ministry of Justice, the Balti Court by judgment of 16 August 2024 ordered to limit the activity of the ChP for a period of 3 months. Subsequently, by decision of the Balti Court of Appeal of 11 September 2024, the judgment of the Balti Court was upheld.

Following the issuance of an enforceable court ruling, the CEC by Decision no. 2864 of 14 September 2024 excluded the ChP from the list of political parties that have the right to participate in the presidential election and the republican constitutional referendum of 20 October 2024. By the same decision, the CEC rejected the application to register the ChP as a participant in the referendum, revoking CEC Decision no.

<sup>80</sup> [CEC Decision no. 2240](#) of 14 February 2024 on approval of the Report on the results of complex control of electoral campaign financing of the electoral competitor Chance Party related to the general local elections of 5 November 2023

2829/2024 on the application for registration of the Chance Party as a participant in the republican constitutional referendum of 20 October 2024.

Therefore, there are currently 10 registered participants in the referendum.

## V. PERFORMANCE OF ELECTORAL COMPETITORS

### 5.1. IG activity of collecting signatures in support of candidates for the office of President

During the monitored period, Promo-LEX observers reported at least 475 activities carried out by the 12 IGs registered to collect signatures in support of the nominated candidates for the office of President (see Table no. 9<sup>81</sup>). According to the reported information, most of the activities were observed in the case of the IG of Ion Chicu (PDCM), which carried out 30% of the observed activities, followed by the IG of Renato Usatii (OP) – 21%, and the IG of Maia Sandu (PAS) – 21%.

Table no. 9. Activities carried out by IGs to collect signatures

Activities carried out by IGs	Ion Chicu (PDCM)	Renato Usatii (OP)	Maia Sandu (PAS)	Andrei Nastase (IC)	Irina Vlah (IC)	Tudor Ulianoschi (IC)	Octavian Ticu (Together EB)	Vasile Tarlev (FMP)	Natalia Morari (IC)	Alexandr Stoianoglo (PSRM)	Igor Munteanu (CUB)	Vasile Tarlev (IC)	Alexandru Arseni (IC)	TOTAL
Signature collection	94	75	88	27	8	22	10	10	8	4	4	1	1	352
Dissemination of information materials	40	18	1	3	10		3			1				76
Door-to-door activities	4	6	5		1	4		1			1			22
On-site visits	1		3	1	2		5	1		1				14
Meetings with voters			1		4			1						6
Press conference					1		1	1						3
Protests / flash mobs	1													1
Other				1										1
<b>TOTAL</b>	<b>140</b>	<b>99</b>	<b>98</b>	<b>32</b>	<b>26</b>	<b>26</b>	<b>19</b>	<b>14</b>	<b>8</b>	<b>6</b>	<b>5</b>	<b>1</b>	<b>1</b>	<b>475</b>

In terms of the location where activities took place, the most – 15% – were in Chisinau, followed by Balti – 10%, Donduseni, Ialoveni, and Causeni – 5% each.

In this context, we shall reiterate that in the case of IGs, the activities mentioned above strictly cover the signatures collection period, between the date of registration of the IG by the CEC and the date of submission of signatures collecting lists to the CEC. Thus, we noted that in the case of the IG of Alexandr Stoianoglo (PSRM), the respective period constituted 3 days, IGs of Vasile Tarlev (FMP) – 10 days, Maia Sandu (PAS) – 13 days, Renato Usatii (OP) – 19 days, Irina Vlah (IC) – 23 days, and Ion Chicu (PDCM) – 24 days. In the case of other IGs, the signature collection period continues.

In the case of the IG of Vasile Tarlev, during the collection of signatures both as IC and nominated by the FMP, there were reported cases of collection of signatures by the leaders of territorial organizations of the PCRM (Floresti, Ocnita, Cahul – including using the territorial offices of the party for this purpose).

In the case of the same candidate, on 12 September 2024, in the village of Cania, Cantemir district, an unauthorized person collected signatures. According to police representatives, the person admitted that he was asked by a third person to collect signatures in support of the candidate for an amount of 50 MDL per signature.

In the case of the IG of Tudor Ulianoschi (IC), on 13.09.2024, in Telenesti, it was observed that signatures were collected by a person who was not registered as a member of the IG. At the attempt to obtain details of his actions, the person informed the Promo-LEX observer that he was replacing someone. Meanwhile, the chairperson of the Telenesti DEC also approached the tent and notified the police that an unauthorized person was collecting signatures.

In the case of the same candidate, in Balti, the police took notice of a tent for collecting signatures being installed without requesting/informing the local public authority.

In the case of the IG of Victoria Furtuna (IC), Promo-LEX observers did not observe signatures collecting activities in the territory. However, according to a notification of Drochia Police Inspectorate to the

<sup>81</sup> In the case of Vasile Tarlev, the reflected information includes both the activities of the first IG registered to support him as an independent candidate and the IG formed by the FMP.

electoral authority, police representatives documented a case in which the priest of the Protection of the Theotokos Church in the village of Miciurin, Drochia district, allegedly received from the diocesan administration a signatures collecting list for the purpose of collecting signatures for the said candidate. Also, the Promo-LEX OM found out about a similar situation of involvement of church representatives in the collection of signatures in favor of Victoria Furtuna in the village of Temeleuti, Floresti district. In this regard, we shall mention that the legislation prohibits financing or any form of material support for initiative groups by religious faiths<sup>82</sup>.

## 5.2. Political promotion activities with electoral undertones in the context of the constitutional referendum

Like in previous elections, the Promo-LEX OM found that several political actors, stakeholders, and electoral competitors carried out promotion activities with electoral undertones in the context of the constitutional referendum of 20 October 2024 before the official start of the electoral campaign (see Table no. 10).

According to art. 1 of the Electoral Code, only political parties and electoral blocs can participate in the referendum this autumn. This contradicts international standards, which recommend granting the possibility to register as participants in the referendum to actors other than political parties or electoral blocs<sup>83</sup>, including civic groups and civic organizations that support or oppose the issue put to referendum.

Table no. 10. Activities with electoral undertones in the context of the constitutional referendum

Activities with electoral undertones / opinion-forming activities	Political entities			Other stakeholders (not covered by the legal framework as participants)					TOTAL
	Victory PB	PAS	Together EB	Citizens for Europe	The Voice of Moldovans	Institute for Strategic Initiatives	Laboratory of Initiatives for Development	Others <sup>84</sup>	
Sponsored posts / video spots				7	16	6		3	32
Meetings with voters	14	5		3				1	23
Dissemination of information materials	60	1		5			2		68
Protests / flash mobs	8							1	9
Concerts		1							1
Press conference		1	1						2
Other				4				4	8
<b>TOTAL</b>	<b>82</b>	<b>8</b>	<b>1</b>	<b>19</b>	<b>16</b>	<b>6</b>	<b>2</b>	<b>9</b>	<b>143</b>

\* Victory PB is a political entity without legal status, established on 21 April 2024 in Moscow, Russian Federation, which includes 4 political parties registered in the Republic of Moldova (Revival Party, Chance Party, Alternative Force for the Salvation of Moldova, and Victory Party), affiliated with Ilan Shor and the Shor Party (declared unconstitutional).

The electoral campaign is to start for all electoral competitors on 20 September 2024<sup>85</sup>. Therefore, all financial expenses incurred for activities with electoral undertones carried out before the start of the electoral campaign are not legally included in campaign expenses, which – in the opinion of Promo-LEX – leads to circumvention of the legal framework regarding the financing of the electoral campaign. In the situation described, the actual campaign expenses incurred by competitors would be much higher than just those to be reported for the 30 days of the campaign (20 September – 20 October 2024).

<sup>82</sup> Art. 54 para. (5) of the Electoral Code.

<sup>83</sup> [CDL-AD\(2022\)025-e](#) - Joint opinion on the draft electoral code, adopted by the Venice Commission (Venice, 21-22 October 2022), p. 32.

<sup>84</sup> Others were actors for whom only one event was observed: INOTEK, Bulgarian Community Development Association of the Republic of Moldova, Sunflower Association, NOKTA, NU ACUM portal.

<sup>85</sup> Pt. 42 of the [Calendar program](#) of activities for the organization and conduct of the general local elections of 5 November 2023.



### 5.3. Pre-electoral advertising and advertising with electoral undertones

#### 5.3.1. Background to presidential election

In the context of signature collection, in the case of 11 IGs the Promo-LEX observers reported at least 1,120 situations in which pre-electoral advertising was used to collect signatures (see Table no. 11). The most used forms were street advertising – 26%, followed by printed informative materials (leaflets, flyers) – 20%, and, respectively, internet advertising (Google ads)<sup>86</sup> – 19%.

Table no. 11. Cases of use of pre-electoral advertising

<i>Types of advertising</i>	<i>Ion Chicu (PDCM)</i>	<i>Renato Usatii (OP)</i>	<i>Natalia Morari (IC)</i>	<i>Maia Sandu (PAS)</i>	<i>Andrei Nastase (IC)</i>	<i>Tudor Ulianovschi (IC)</i>	<i>Irina Vlah (IC)</i>	<i>Octavian Ticu (Together EB)</i>	<i>Igor Munteanu (CUB)</i>	<i>Alexandr Stoianoglo (PSRM)</i>	<i>Vasile Tarlev (FMP)</i>	<i>TOTAL</i>
Billboards, tents	112	71	3	45	20	24	3	7	3	1	3	292
Newspapers, leaflets, flyers, etc.	103	63		1	14	10	14	7	4	1	3	220
Google ads		10	204									214
Sponsored posts	117	2	6	72	6	1			2			206
Vests, bags, caps, etc.	38	82		34	3				2			159
Video spots		4	6	9	2	3	3				2	29
<b>Total cases</b>	<b>370</b>	<b>232</b>	<b>219</b>	<b>161</b>	<b>45</b>	<b>38</b>	<b>20</b>	<b>14</b>	<b>11</b>	<b>2</b>	<b>8</b>	<b>1,120</b>

On the same topic, we shall mention that during the monitored period, there were observed about 40 sponsored posts (130 thousand MDL) on social networks relevant to the presidential election made by Veaceslav Platon, who, although not classified as a subject of political/electoral advertising, contributes financially to political/electoral financing, especially through posts against the government and Maia Sandu. In this context, we reiterate Promo-LEX's opinion on the need to regulate political and electoral financing by third parties<sup>87</sup>.

Also, the Promo-LEX OM found that in the case of the IG of Tudor Ulianovschi (IC), banners for tents were printed before the registration of IG and – we reiterate<sup>88</sup> – could not be covered by the legal provisions for political advertising.

#### 5.3.2. Background to the constitutional referendum

During the monitored period, the use of advertising with electoral undertones relevant to the constitutional referendum was observed in the case of Victory PB (73 cases), Citizens for Europe (14 cases), and the Laboratory of Initiatives for Development (4 cases).

On this topic, we shall mention that cases of dissemination of relevant advertising before 20 August 2024 (e.g., billboards of PAS, PSRM, etc.) were not included.<sup>89</sup>

#### 5.3.3. Compliance of pre-electoral advertising / advertising with electoral undertones

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 interest<sup>90</sup>.

Thus, according to pt. 19 and 97 of the Regulation, **each typed/printed material must contain the following information:** legible, easily discernible, and intelligible name of the provider who ordered it and

<sup>86</sup> With reference to Google ads, we shall mention that the Republic of Moldova is not in the list of states for which the search engine ensures the transparency of political advertising. Thus, it is not possible to estimate the financial expenses incurred for this type of advertising.

<sup>87</sup> [Policy paper](#): Political and electoral financing by “third parties”

<sup>88</sup> [Report no. 1](#): Promo-LEX Observation Mission for the presidential election and the republican constitutional referendum of 20 October 2024, p. 27.

<sup>89</sup> [Report no. 1](#): Promo-LEX Observation Mission for the presidential election and the republican constitutional referendum of 20 October 2024, p. 26-27.

<sup>90</sup> [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.

name of the subject of advertising; the title “Political advertising”, “Electoral advertising”; identification data of the specialized economic entity that provided the printing service and, as the case may be, of the person who made the design and/or layout of the printed material; the executed copies, the order number, and the number of the payment invoice.

Contrary to the above, however, in the case of the IG of Renato Usatii (OP) and the IG of Tudor Ulianoschi (IC), it was found that the tents used by them do not contain data on the executed copies. Also, in the case of the IG of Irina Vlah (IC), the use of a flyer that did not contain information on the executed copies was reported.

Furthermore, in the context of promotion of the constitutional referendum, at least 68 cases were reported in which advertising was distributed without complete information on printing data. Of these, in 62 cases the Victory PB was concerned, which distributed at least 3 types of anti-EU and pro-Eurasia flyers.

Also, in the context of the referendum, the Promo-LEX OM noted that some civic organizations/initiatives disseminated various advertising materials: 4 cases – Citizens for Europe, which distributed street banners; 2 cases – the Laboratory of Initiatives for Development, which distributed flyers promoting EU values<sup>91</sup>.

#### 5.4. Misuse of administrative resources

The definition and concept of administrative resources, as well as their misuse in the context of elections, including the referendum, was analyzed in previous Promo-LEX reports<sup>92</sup>.

During the monitored period, Promo-LEX found at least 12 cases of misuse of administrative resources, of which 7 cases concerned PAS, 2 cases – Victory PB, one case each – Together EB, PDCM, and LPA.

**LPA:** On 5 September 2024, 4 mayors (Ungheni – IC; Edinet – League of Towns and Communes; Sireti village, Strasenii District – PAS; Cruzesti commune, Chisinau – Liberal Party), at a press conference held during working hours, where some presented themselves as representatives of virtually all mayors, came with a statement and urged voters to vote firmly YES for the referendum of 20 October 2024.

**Together EB:** Some school directors (including the director of Holosnita Gymnasium, who is on maternity leave), subordinated to the vice-president of Soroca District Iurie Tanase (PPPDA chairman), allegedly were tasked to collect 30 signatures each for the candidate nominated by Together EB.

**Victory PB:** On 15 August 2024<sup>93</sup>, the Orhei District Council ordered the allocation of 300,000 MDL to the General Directorate of Education for the purpose of purchasing school bags and school supplies for first-grade students. They were to be distributed at the beginning of the new school year to children from Orhei district. On 2 September 2024, the mentioned school bags were promoted by Victory PB representatives (Alexei Lungu, Marina Tauber) as being donated by Victory PB and its leader Ilan Shor.

On 7 September 2024, in Congaz, Gagauzia (GagauziyaLand), under the aegis of and with financing from the Executive Committee and the Bashkan, the festival of Gagauz culture “Gagauz korafi - 2024” was organized and held. The event was used by Victory PB representatives to promote their political discourse (Vasile Bolea, Marina Tauber, Alexei Lungu).

**PAS:** On 14 August 2024, the mayor’s office of Cahul issued an order granting the grand hall of the “Nicolae Botgros” Palace of Culture to the territorial organization of PAS for the holding on 29 August 2024 of a concert in order to promote European values. Later, however, on 23 August 2024, the event was promoted on the social networks<sup>94</sup> of the Cahul District Council as being organized by the Cahul District Council in

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<sup>91</sup> Citizens for Europe and the Laboratory of Initiatives for Development are not subjects of political advertising.

<sup>92</sup> [Report no. 1](#): Promo-LEX Observation Mission for the presidential election and the republican constitutional referendum of 20 October 2024, p. 29.

<sup>93</sup> [Decision](#) of Orhei District Council no. 4/14.2 of 15.08.2024 on the allocation of funds.

<sup>94</sup> The post dated 23 August 2024 was deleted from the authority’s Facebook page. Instead, it can be viewed [here](http://www.monitor.md) ([www.monitor.md](http://www.monitor.md)).

partnership with the mayor's office of Cahul and the "Nicolae Botgros" Palace of Culture. During the event, accession to the EU was promoted, as well as Maia Sandu, as promoter of the idea of accession.

On 29 August 2024, Iurie Levinschi, president of the Hincesti District Council, Member of the IG of Maia Sandu (PAS), collected signatures in her support during working hours in the localities Lapusna, Voinescu and Carpineni, Hincesti district.

On 29 August 2024, PAS MP Mihail Leahu, member of the IG of Maia Sandu, went to the Territorial Office of Social Insurance in Donduseni to collect signatures during the working hours of the institution/employees.

On 30 August 2024, PAS MP Larisa Voloh, member of the IG of Maia Sandu, collected signatures in the town hall of Caplani village of Stefan Voda district during the working hours of the institution/employees.

On 30 August 2024, a member of the IG of Maia Sandu, accompanied by a doctor statistician, collected signatures in the premises of the Telenesti District Polyclinic during the working hours of the institution.

On 31 August 2024, in the village of Untesti, Ungheni district, the park built within the European Village project was put into operation. At the event, on the stage in front of over 150 people, Dionisie Ternovschi, president of Ungheni district, said in his speech, "It is very important to pass the exam on 20 October. Please be present at the referendum that will take place. There is also the presidential election, but I'm not going to tell you who to vote for in the presidential election. I urge you to vote for the referendum and the person who initiated these ideas and wants us in the great European family."

On 3 September 2024, in a video spot posted on social networks<sup>95</sup>, Maia Sandu analyzed the infrastructure achievements made at the national level in line with the promises made in 2020. In this context, she mentioned the financial allocations made in the context of the European Village project, which resulted in projects of sewerage, repair of roads and public buildings, etc.

**PDCM:** On 12 September 2024, during working hours, the mayors of Mihailovca and Albina localities of Cimislia district collected signatures in support of the candidate for President Ion Chicu (PDCM).

## **5.5. LPA position in relation to the constitutional referendum**

According to Promo-LEX observers, at least 21 LPAs<sup>96</sup>, by decision of local councils<sup>97</sup>, approved the *Declaration of support for the referendum of 20 October 2024 and the European path of the Republic of Moldova* (the text of the declaration is practically the same for all LPAs). Through these declarations, the mentioned LPAs expressed their support and commitment to contribute to the process of Moldova's accession to the EU. Also, the local councils delegated to the mayor the task of communicating the declaration to all relevant structures and ensuring its promotion among citizens.

Some political actors expressed concern about this situation, saying that mayors received letters from the State Chancellery asking them to put on the agenda of the local councils topics regarding support of the

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<sup>95</sup> Video spot posted on the social networks of [the president](#) of the Republic of Moldova, Maia Sandu.

<sup>96</sup> Corjeuti town hall, Briceni district; Petreni town hall, Drochia district; Sudarca town hall, Donduseni district; Frasin town hall, Donduseni district; Lunga town hall, Floresti district; Festelita town hall, Stefan Voda district; Rascaieti town hall, Stefan Voda district; Antonesti town hall, Stefan Voda district; Popeasca town hall, Stefan Voda district; Tocuz town hall, Causeni district; Taraclia town hall, Causeni district; Baimaclia town hall, Causeni district; Baccalia town hall, Causeni district; Hagimus town hall, Causeni district; Mihalaseni town hall, Ocnita district; Ocnita town hall, Ocnita district; Singerei town hall, Singerei district; Cantemir District Council; Zagarancea town hall, Ungheni district; Macaresti town hall, Ungheni district; Stoicani town hall, Soroca district.

<sup>97</sup> For example, [Decision](#) no. 4/15 of 06.09.2024 of the Chircaiesti Village Council, Causeni district, on approval of the declaration of support for the referendum of 20 October 2024 and the European path of the Republic of Moldova.

referendum and voting for European integration<sup>98</sup>. However, these statements were denied by representatives of the State Chancellery.

On this aspect, we shall draw the attention of LPAs that according to the *Code of good practice on referendums*<sup>99</sup>, unlike other ballots, in the context of which the state authorities must ensure neutrality, in the case of referendums they can convey their viewpoint for or against the text put to the vote.

Even so, in order to ensure equal opportunities, as well as the freedom of voters to form an opinion, public authorities should not abuse their position and, in particular, should not use public money to promote their opinion in relation to the question put to the referendum. In addition, public authorities at every level (national, regional or local) must not engage in excessive, one-sided campaigning, but show objectivity.

## 5.6. Activities with potential to corrupt voters

According to art. 181<sup>1</sup> of the Criminal Code, offering or giving money, goods, services or other benefits in order to determine the voter or supporter to exercise or not exercise their electoral rights in elections is punishable by a fine in the amount of 750 to 1,150 conventional units (37,500 – 57,500 MDL) or imprisonment from one to 5 years, and a legal person is punishable by a fine in the amount of 6,000 to 8,000 conventional units (300,000 – 400,000 MDL) with deprivation of the right to exercise a certain activity or with liquidation of the legal entity.

During the monitored period, cases were observed that can be qualified with potential to corrupt voters, related to the Victory PB and the FMP.

**Victory PB.** On 2 September 2024, on behalf of the Victory PB and its leader Ilan Shor, school bags and school supplies were distributed to first-grade students from socially vulnerable families, as follows: Gagauzia – over 1,200 school bags; Chisinau – 570 school bags; Balti – 200; Taraclia – 700. In addition to school bags, other gifts were offered to educational institutions (e.g. interactive whiteboards, etc.) and children from Briceni, Ocnita, Drochia, Dubasari, Calarasi, Hincesti, Leova, Riscani, Singerei, Stefan Voda, and other localities. According to Marina Tauber<sup>100</sup>, in total, the leader of Victory PB gave about 5,700 gifts to first-grade students and those from low-income families.

In early September, a person from Basarabeasca district and a child from Cantemir received wheelchairs on behalf of the Victory PB. The gifts were allegedly offered after their relatives addressed the so-called audience office to ask for help from Ilan Shor's team.

On 13 September 2024, as a result of the visit of the Promo-LEX observer to the village of Zgurita, Drochia district, from discussions with local residents, it was found that the representatives of Victory PB organize meetings in which people are promised amounts of 1,000 MDL for a signature, the money being offered a day later (after they sign).

We shall note that during this period, the police conducted several searches of parties affiliated to Ilan Shor<sup>101</sup>, in a criminal case initiated for illegal financing of political parties, initiative groups, and electoral competitors. According to the General Police Inspectorate, it was found that the recipients of the money are members of the primary territorial organizations of some political parties in the country, paid monthly from obscure sources, not reflected in the accounting records for activities performed in the context of the upcoming presidential election, including for participation in rallies, flashmobs, and protest actions. Thus, the NGO Eurasia is involved in the financing of the chairpersons of territorial offices and party activists, the money being transferred through the commercial bank Promsvyazbank from the Russian Federation (under international sanctions for providing support to the Russian army in the war in Ukraine). It is

<sup>98</sup> [Declaration](#) of the Party of Socialists of the Republic of Moldova.

<sup>99</sup> [Code of good practice on referendums](#), CDL-AD(2022)015, approved by Venice Commission, Strasbourg, 20 June 2022, para. 11, p. 20-21.

<sup>100</sup> [Article](#): Thousands of children from needy families across the country received school bags and school supplies at the start of the school year.

<sup>101</sup> [Press release](#) of the General Police Inspectorate of 09.09.2024

important to note that Ilan Shor also acknowledged<sup>102</sup> cooperation with Promsvyazbank and the financing of Eurasia ambassadors. At the same time, the U.S. State Department announced on 13 September 2024 the application of international sanctions against the NGO Eurasia<sup>103</sup>, which is involved in undermining democracy and intervening in the electoral process in the Republic of Moldova.

As a result of discussions with police representatives, it was found that on 12 September 2024, in the village of Cania, Cantemir district, an unauthorized person allegedly collected signatures in support of the IG of Vasile Tarlev (FMP). According to the source, investigation was started for the situation described, and the person admitted that he was asked by a third person to collect signatures in support of the candidate for an amount of 50 MDL per signature.

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<sup>102</sup> [Post](#) of Ilan Shor on 10.09.2024 on his Telegram channel.

<sup>103</sup> [Press release](#) of the U.S. State Department of 13.09.2024

## VI. ELECTION AND CAMPAIGN FINANCING

### 6.1. Financial reporting to the CEC and management of the process by the electoral authority

#### 6.1.1. Financial reporting in the context of the presidential election

The process of financial reporting of IGs / 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 or initiative group shall appoint and present for confirmation to the CEC a person responsible for finances (treasurer).

Of the 13 registered IGs, only in the case of the IG of Alexandru Arseni (IC) the person responsible for finances was not confirmed and registered (see Table no. 12).

Regarding electoral competitors, we shall mention that both electoral competitors registered during the monitoring period – Alexandr Stoianoglo (PSRM) and Maia Sandu (PAS) – appointed and confirmed the person responsible for finances (treasurer).

Table no. 12. Information on financial reporting to the CEC in the context of the presidential election<sup>104</sup>

No.	IG	Political affiliation	Treasurer registration	Report and the start of campaign	Opening of "Electoral fund" account	Term 26.08.2024	Term 02.09.2024	Term 09.09.2024	Term 16.09.2024	Final report (3 days after submission of lists)
1	IG of Ion Chicu	PDCM	23.08.2024		23.08.2024	28.08.2024	08.09.2024	09.09.2024	16.09.2024	
2	IG of Alexandr Stoianoglo	PSRM	23.08.2024	02.08.2024	information	27.08.2024	N/A	N/A	N/A	28.08.2024
3	IG of Octavian Ticu	Together EB	23.08.2024	16.09.2024	31.08.2024	information	02.09.2024	09.09.2024	16.09.2024	
4	IG of Tudor Ulianoschi	IC	24.08.2024	N/A	05.09.2024	28.08.2024	information	09.09.2024	16.09.2024	
5	IG of Renato Usatii	OP	24.08.2024	26.08.2024	26.08.2024	26.08.2024	02.09.2029	09.09.2024	N/A	13.09.2024
6	IG of Irina Vlah	IC	24.08.2024		02.09.2024	information	02.09.2029	11.09.2024	16.09.2024	
7	IG of Igor Munteanu	CUB	24.08.2024		03.09.2024	information	information	09.09.2024		
8	IG of Maia Sandu	PAS	24.08.2024	29.08.2024	26.08.2024	27.08.2024	02.09.2029	09.09.2024	N/A	13.09.2024
9	IG of Victoria Furtuna	IC	26.08.2024	N/A	31.08.2024	information	02.09.2029	09.09.2024	16.09.2024	
10	IG of Andrei Nastase	IC	26.08.2024	N/A	29.08.2024	N/A	02.09.2029	09.09.2024		
11	IG of Natalia Morari	IC	27.08.2024	N/A	03.09.2024	information	information	09.09.2024	16.09.2024	
12	IG of Alexandru Arseni	IC		N/A	information	N/A	information	information	information	
13	IG of Vasile Tarlev	FMP	03.09.2024		10.09.2024	N/A	information	information	16.09.2024	

- *Opening of the account "For the initiative group" / "Electoral fund";*

According to art. 56 para. (1) of the Electoral Code, within 3 days after registration, the initiative group / electoral competitor shall open at the bank an account with the mention "For the initiative group" / "Electoral fund". 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.

Table no. 12 shows data on the opening of accounts with the mention "For the initiative group". Thus, out of the 13 registered IGs, 2 IGs – of Alexandr Stoianoglo (PSRM) and Alexandru Arseni (IC) – did not open a special bank account.

Regarding the opening of bank accounts with the mention "Electoral fund" by registered electoral competitors, we note that no relevant data were published on the CEC website. However, we shall mention

<sup>104</sup> On 18.09.2024, the financial reports of the IG of Igor Munteanu (CUB) and IG of Andrei Nastase (IC) as of 16.09.2024 were not yet published on the official website of the CEC. It is therefore unclear whether they were not submitted to the CEC or not published on the electoral authority's website. Hence, all data on income and expenses in the case of these two IGs are reflected as of 09.09.2024.



that information was to be presented by the two registered electoral competitors (Alexandr Stoianoglo (PSRM) and Maia Sandu (PAS)).

Like in previous elections, some electoral competitors publicly invoked difficulties in the process of opening bank accounts, manifested either in the refusal of some banks to open this account (IG of Natalia Morari (IC)), or in delay of the process of opening those accounts (IGs of Octavian Ticu (Together EB), Vasile Tarlev (FMP), etc.). Such situations affected the work of IGs and, respectively, the collection of signatures<sup>105</sup>. In this context, we reiterate Promo-LEX's opinion on the need to identify effective solutions to ensure the opening of special accounts, so that equality of opportunities could be guaranteed for all electoral competitors.

- *Submission of the financial report at the start of election period by political parties that intend to transfer their own funds to the account "For the initiative group" / "Electoral fund".*

According to art. 57 para. (3) of the Electoral Code, political parties may transfer to the account with the mention "For the initiative group" / "Electoral fund" their own funds, held on their account at the date of the start of the election period, under the condition of submitting the financial report to the CEC with information about the income accumulated and expenses incurred before the start of the election period.

According to the official website of the CEC, these reports were presented by 4 political parties – PSRM, OP, PAS, and PPPDA (member of the Together EB).

- *Weekly/final reporting on income accumulated and expenses incurred during the signature collection period.*

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 program<sup>106</sup>, reports on income accumulated and expenses incurred during the signatures collection period / electoral campaign. In the case of IGs, within 3 days of submission of signatures collecting lists, they are to submit the final financial report of the IG.

During the monitored period, the registered IGs were to submit financial reports on 26.08.2024, 02.09.2024, 09.09.2024, and 16.09.2024. Table no. 12 shows information on the presentation of financial reports by registered IGs. All registered IGs – either within or exceeding the established deadline – submitted relevant information on the financing of the IG's activity.

Regarding the quality of reporting, we still note a low level of accuracy in completion of reports (errors are committed, complete data on donors are not included, etc.), which implies the submission of reports with necessary corrections (in some cases, even two reports to correct the same report).

### **6.1.2. Financial reporting in the context of the constitutional referendum**

The process of financial reporting of the participants in the referendum includes the same steps as for IGs / electoral competitors. Table no. 13 shows data on financial reporting by registered referendum participants during the monitored period. Thus, out of 9 registered participants, only 3 informed about the opening of the "Electoral fund" account (PCRM, RMM, and ALDE).

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<sup>105</sup> According to the candidate [Octavian Ticu](#) (Together EB), the IG in his support began to be visible only at the beginning of September, when it managed to carry out financial transactions and, respectively, purchase visibility and information materials.

<sup>106</sup> [Calendar program](#) for implementation of actions to organize and conduct the election for the office of President of the Republic of Moldova and the republican constitutional referendum of 20 October 2024.

Table no. 13. Information on financial reporting to the CEC in the context of the constitutional referendum

<i>Participant</i>	<i>Date of registration</i>	<i>Treasurer</i>	<i>Report at the start of campaign</i>	<i>Opening of "Electoral fund" account</i>
PCRM	23.08.2024	06.09.2024		11.09.2024
FMP	29.08.2024	31.08.2024		
RMM	31.08.2024	31.08.2024	02.09.2024	17.09.2024
ALDE	02.09.2024	02.09.2024		05.09.2024
RP	06.09.2024	12.09.2024		
CUB	12.09.2024			
Together EB	12.09.2024		16.09.2024	
PAS	12.09.2024	12.09.2024	29.08.2024	
MAN	16.09.2024	16.09.2024		

### 6.1.3. Management of the process by the electoral authority

According to art. 58 para. (8) of the Electoral Code, within 24 hours after receiving and accepting the campaign financial reports, the CEC must place them on its official website, and their publication format must be reusable in order to ensure the possibility of easy data processing<sup>107</sup>.

Contrary to the above, however, we find that the financial reports published on the CEC website do not correspond to the principle of open data, being in PDF image format, which is why it is very difficult to discern figures in them<sup>108</sup>.

During the monitored period, the CEC adopted 3 decisions<sup>109</sup> on the supervision of the activity of initiative groups established to collect signatures in support of candidates for the office of President of the Republic of Moldova in the presidential election of 20 October 2024. According to them, the electoral authority identified donations that contravene legal provisions (a donation was identified for the IG of Natalia Morari (IC) from an individual who received only scholarships or other social benefits, but the donation exceeded the legal limit of one average salary per economy by 6,100 MDL).

The CEC also warned the IGs of Andrei Nastase (IC), Natalia Morari (IC), and Octavian Ticu (Together EB) on the need to submit financial reports and relevant information within the deadline and format requested by the electoral authority.

## 6.2. Income and expenses reported by electoral competitors to the CEC

### 6.2.1. Reported income and its source in the context of the presidential election

By 16 September 2024, 12 IGs of the 13 registered<sup>110</sup> reported income totaling 2,009,727 MDL, of which 292,076 MDL from material donations (15% of the total declared income).

The most income was declared by the IG of Maia Sandu (PAS) – 23% of the total declared income, followed by Irina Vlah (IC) – 17%, and, respectively, Ion Chicu (PDCM) and Natalia Morari (IC) – 15% each (see Graph no. 3).

<sup>107</sup> According to pt. 81 of [Regulation](#) on the financing of initiative groups and electoral campaigns.

<sup>108</sup> See, for example, the financial reports of IGs of [Natalia Morari \(IC\)](#), [Maia Sandu \(PAS\)](#), etc.

<sup>109</sup> 1) [CEC Decision](#) no. 2798 of 31.08.2024 on the supervision of the activity of initiative groups established to collect signatures in support of candidates for the office of President of the Republic of Moldova in the presidential election of 20 October 2024;

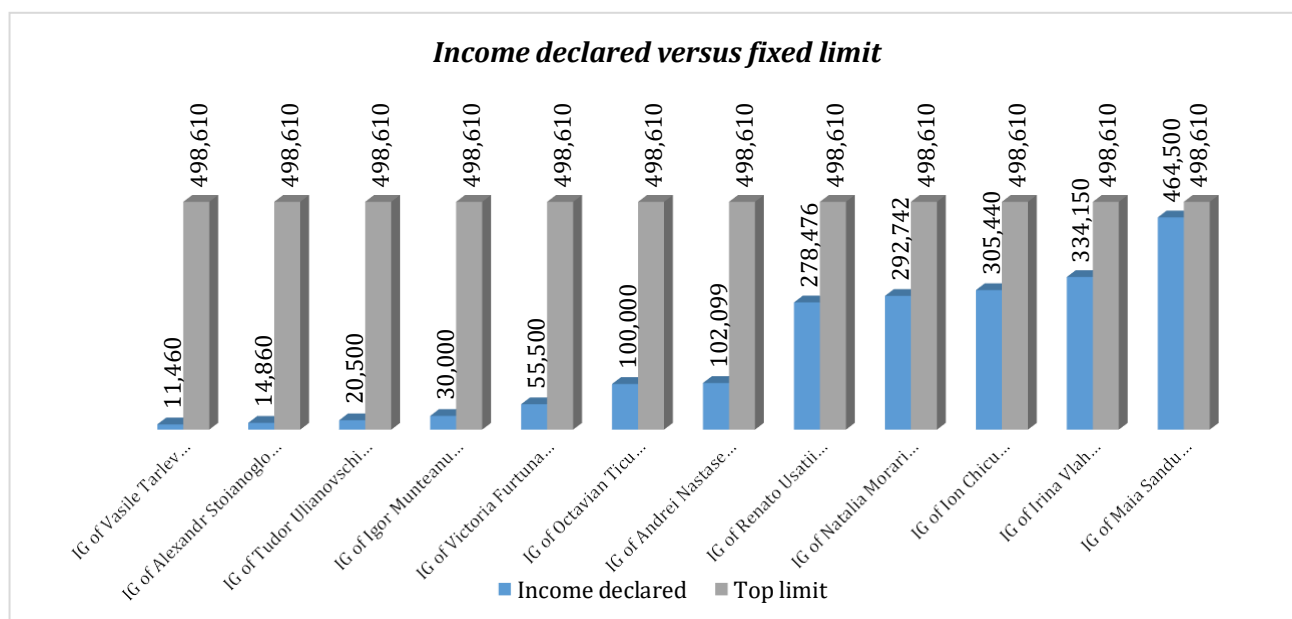
2) [CEC Decision](#) no. 2824 on the supervision of the activity of initiative groups established to collect signatures in support of candidates for the office of President of the Republic of Moldova in the presidential election of 20 October 2024, as of 2 September 2024;

2) [CEC Decision](#) no. 2879 on the supervision of the financing of initiative groups established to collect signatures in support of candidates for the office of President of the Republic of Moldova in the presidential election of 20 October 2024, as of 9 September 2024.

<sup>110</sup> The IG of Alexandru Arseni (IC) had no declared income and expenses.

In relation to the limit set for the IG activity, according to the declared information, none of the incomes and expenses for collecting signatures exceeded the limit (498,610 MDL). However, in the case of the IG of Maia Sandu (PAS) the limit was reached at 93%, followed by Irina Vlah (IC), where the limit was reached at 67%.

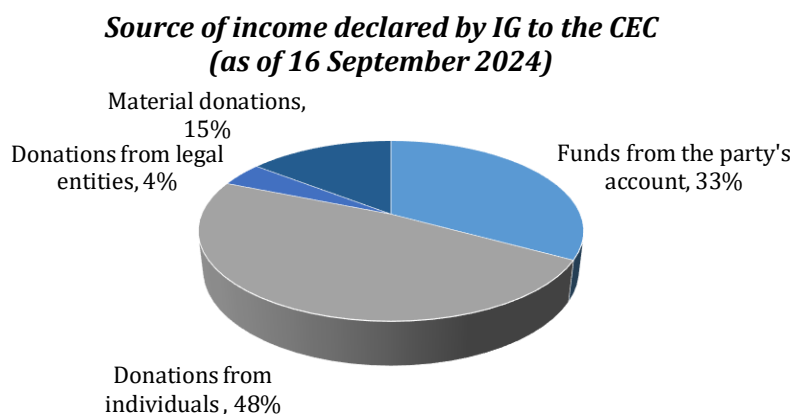
Graph no. 3



In terms of the source of income, we find the following situation (see Graph no. 4):

- 33% (663 thousand MDL) were the funds transferred from the current account of political parties to the account "For the initiative group". Of these, 76% (505 thousand MDL) were from state budget allocations received by political parties (PAS and PPPDA), and 24% (158 thousand MDL) were from private sources (OP);
- 48% (968 thousand MDL) were from donations from individuals collected by 7 IGs (Ion Chicu (PDCM), Igor Munteanu (CUB), Maia Sandu (PAS), Irina Vlah (IC), Tudor Ulianoschi (IC), Andrei Nastase (IC), and Natalia Morari (IC));
- 4% (87 thousand MDL) were from financial donations from legal entities collected by 2 IGs – Andrei Nastase (IC) and Victoria Furtuna (IC);
- 15% (292 thousand MDL) were from material donations, reported by 7 IGs – Ion Chicu (PDCM), Alexandr Stoianoglo (PSRM), Renato Usatii (OP), Maia Sandu (PAS), Victoria Furtuna (IC), Natalia Morari (IC), Vasile Tarlev (FMP).

Graph no. 4



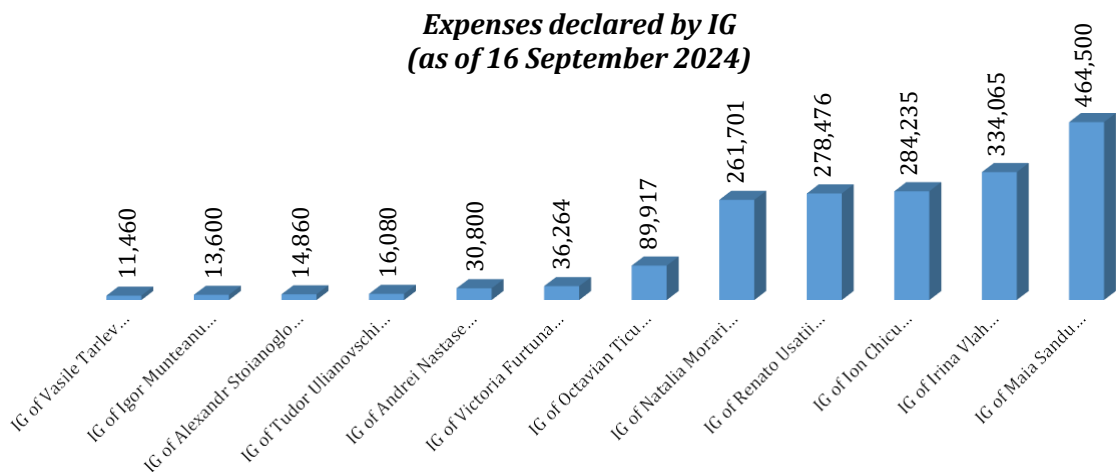
According to art. 57 para. (4) pt. 2) lit. c) of the Electoral Code, in case of donations to support electoral campaigns, legal entities are to present to the electoral competitors for keeping the information issued

from the State Tax Service about the lack of arrears to the budget. Contrary to the above, however, in the case of the IG of Andrei Nastase (IC), a donation was made from a legal entity (SRL "Prompt Engineering") of 47,000 MDL, which had arrears to the state budget<sup>111</sup>.

**6.2.2. Declared expenses and their destination**

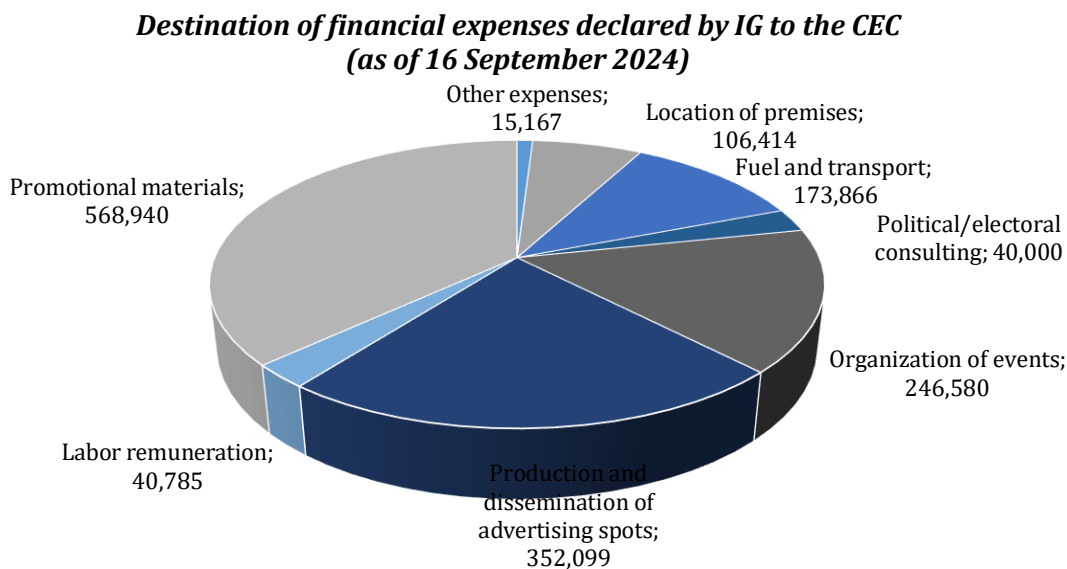
According to the official website of CEC, until 16 September 2024, 12 IGs declared expenses totaling 1,835,958 MDL, of which 292,076 MDL were from material donations. The most expenses were declared by the IG of Maia Sandu (PAS) – 25% of the total reported expenses, followed by Irina Vlah (IC) – 18%, and, respectively, Ion Chicu (PDCM) and Renato Usatii (OP) – 15% each (see Graph no. 5).

Graph no. 5



In terms of the destination of the reported financial expenses, the most – 37% – were for promotional materials, followed by expenses for the production and dissemination of advertising spots – 23%, organization of events – 16%, as well as expenses for fuel and transport, which made 11% of the total financial expenses reported (see Graph no. 6).

Graph no. 6



<sup>111</sup> According to [open data](#) published by the State Tax Service.

### 6.3. Civic monitoring of funding of IG activities

Based on the reports completed by Promo-LEX observers, the IG expenses incurred for the collection of signatures, from the date of registration of each IG until 16 September 2024, were estimated. After estimation, these expenses were contrasted with the expenses declared to the CEC in reports on the financing of IG activities. As methodological benchmarks for estimating expenses, we applied the minimum market prices identified for services, goods, and works used by competitors for electoral campaigning purposes.

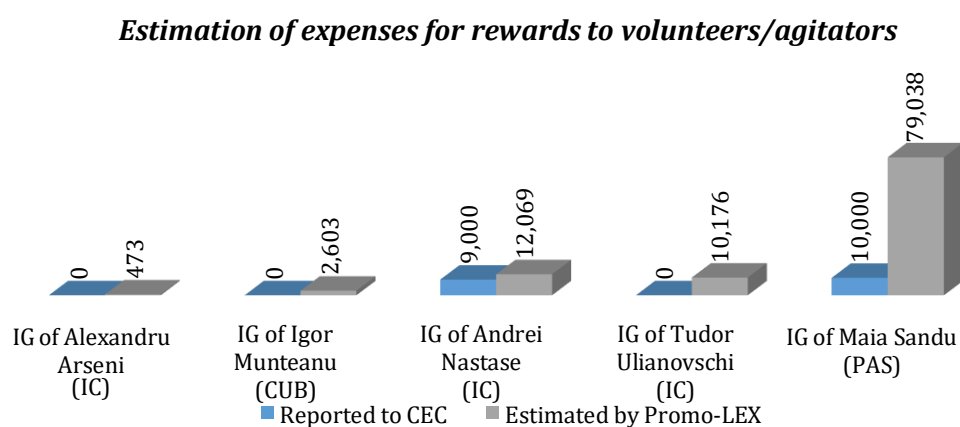
We shall note that these prices were applied uniformly for all IGs. In this regard, we consider that there may be some divergences between the costs applied by Promo-LEX and those indicated by electoral competitors (both in reports of financial expenses and of expenses from material donations).

**IMPORTANT!** We reiterate that on 18.09.2024, the financial reports of the IGs of Igor Munteanu (CUB) and Andrei Nastase (IC) as of 16.09.2024 were not yet published on the official website of the CEC. Therefore, all data on expenses reported to the CEC for these two IGs are reflected as of 09.09.2024.

#### 6.3.1. Estimation of expenses for rewards to volunteers/agitators

During the signature collection period, Promo-LEX observers reported activities involving agitators (distribution of electoral materials) and collectors. As a result, in the case of 5 IGs, unreported expenses of at least 85,358 MDL were estimated (see Graph no. 7). These expenses were estimated based on the amount of the minimum salary per country<sup>112</sup>, being applied the tariff of 29.58 MDL/hour (236.64 MDL/day, 5,000 MDL per month).

Graph no. 7



The most expenses for the rewards of volunteers/agitators, estimated as unreported, were in the case of the IG of Maia Sandu (PAS) - 69,038 MDL, followed by Tudor Ulianoschi (IC) - 10,176 MDL, Andrei Nastase (IC) - 3,069 MDL, Igor Munteanu (CUB) - 2,603 MDL, and, respectively, Alexandru Arseni (IC) - 473 MDL.

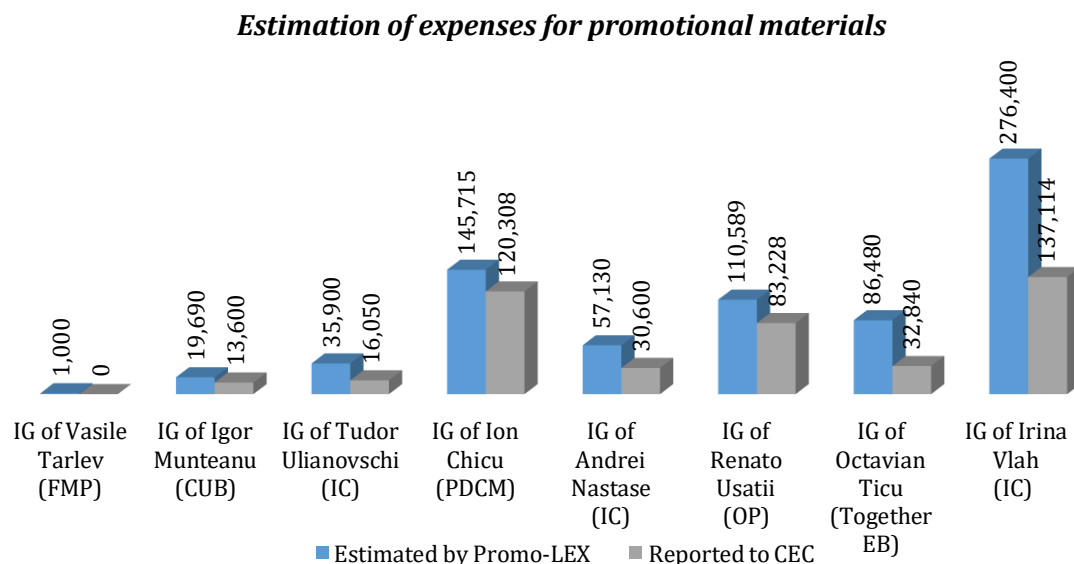
With regard to the involvement of agitators and the reporting/estimation of expenses for the activities provided by them, following the verification of financial reports, it was found that they are not included in the total expenses of IGs. In the opinion of Promo-LEX, these expenses are to be included in total expenditure, according to international standards. Therefore, we reiterate the need for the CEC to develop a guide/instruction on how to complete reports on the activities of IGs and the financing of electoral campaigns in terms of the performance of volunteers/agitators and their reporting.

<sup>112</sup> [Government Decision](#) no. 985 of 06 December 2023 on establishing the amount of the minimum salary per country for 2024.

### 6.3.2. Estimation of expenses for promotional materials

According to Promo-LEX observers, IGs used promotional materials (flyers, banners, video spots, visibility materials, etc.). Based on the observed information, unreported expenses were estimated in the case of 8 IGs, amounting to at least 299,164 MDL (see Graph no. 8).

Graph no. 8



The most expenses for promotional materials estimated as unreported were for the IG of Irina Vlah (IC) – 139,286 MDL, followed by Octavian Ticu (Together EB) – 53,640 MDL, and Renato Usatii (OP) – 27,361 MDL.

### 6.3.3. Estimation of expenses for fixed spaces/devices for advertising

Promo-LEX observers reported on the use of outdoor advertising by some IGs. Based on the reports received from them, unreported expenses were estimated in the case of the IG of Irina Vlah (IC), amounting to at least 105,872 MDL.

### 6.3.4. Estimation of expenses for online advertising

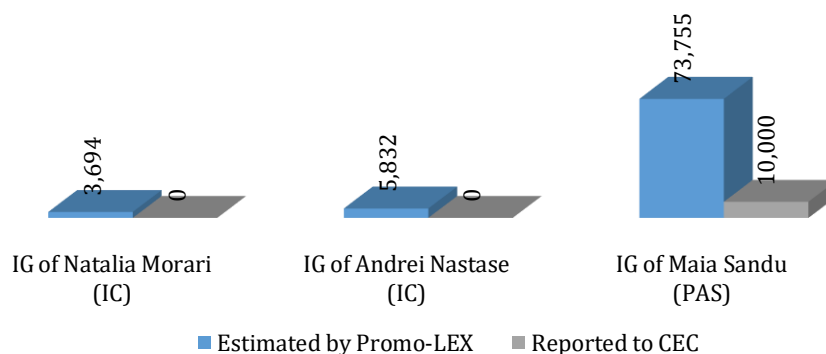
During the monitored period, the use of online advertising through live transmission of various events organized for the purpose of IG promotion and signature collection was observed. Thus, unreported expenses were estimated in the case of 2 IGs, worth at least 4,490 MDL, namely the IGs of Irina Vlah (IC) – 1,574 MDL, and Vasile Tarlev (FMP) – 2,916 MDL.

### 6.3.5. Estimation of expenses for advertising on social networks

Sponsored advertising on social networks was also widely used in the context of signature collection activities by IGs. Based on the information identified in the public reports accessible on Meta, unreported expenses of 3 IGs worth at least 73,281 MDL were estimated (see Graph no. 9).



### *Estimation of expenses for advertising on social networks*



The most expenses for advertising on social networks estimated as unreported were for the IGs of Maia Sandu (PAS) - 63,755 MDL, followed by Andrei Nastase (IC) - 5,832 MDL, and Natalia Morari (IC) - 3,694 MDL.

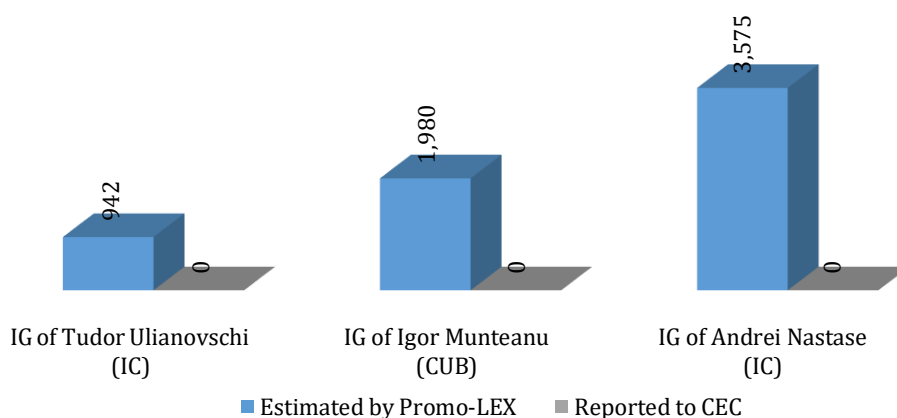
### *6.3.6. Estimation of expenses for the organization of electoral events*

During the signature collection period, Promo-LEX observers reported on the organization of electoral meetings, distribution of electoral materials, etc. Based on these, unreported expenses of at least **5,660 MDL** were estimated in the case of the IG of Irina Vlah (IC).

### *6.3.7. Estimation of fuel and transport expenses*

In the signature collection process, Promo-LEX observers reported IG activities involving travel to various localities in Moldova, which determined transport expenses. Based on the above information, in the case of 3 IGs, unreported expenses of at least **6,497 MDL** were estimated (see Graph no. 10).

### *Estimation of transport expenses*

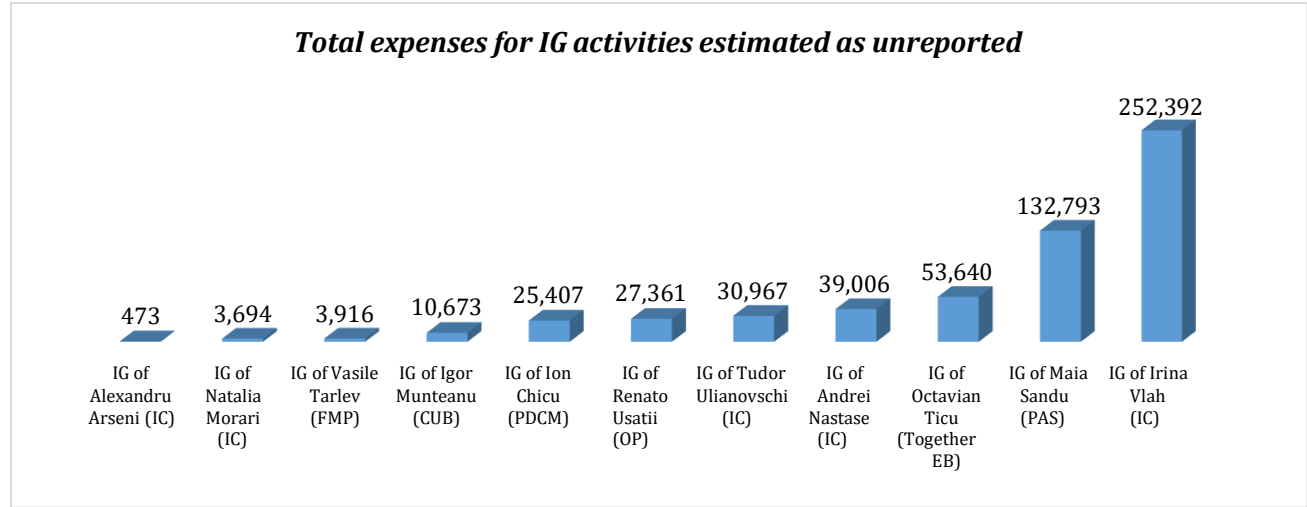


### *6.3.8. Conclusions on the civic monitoring of IG activities*

In the context of the above, for the signature collection activities carried out by 11 IGs, the Promo-LEX OM estimated unreported expenses in the amount of at least **580,321 MDL**. The most unreported expenses

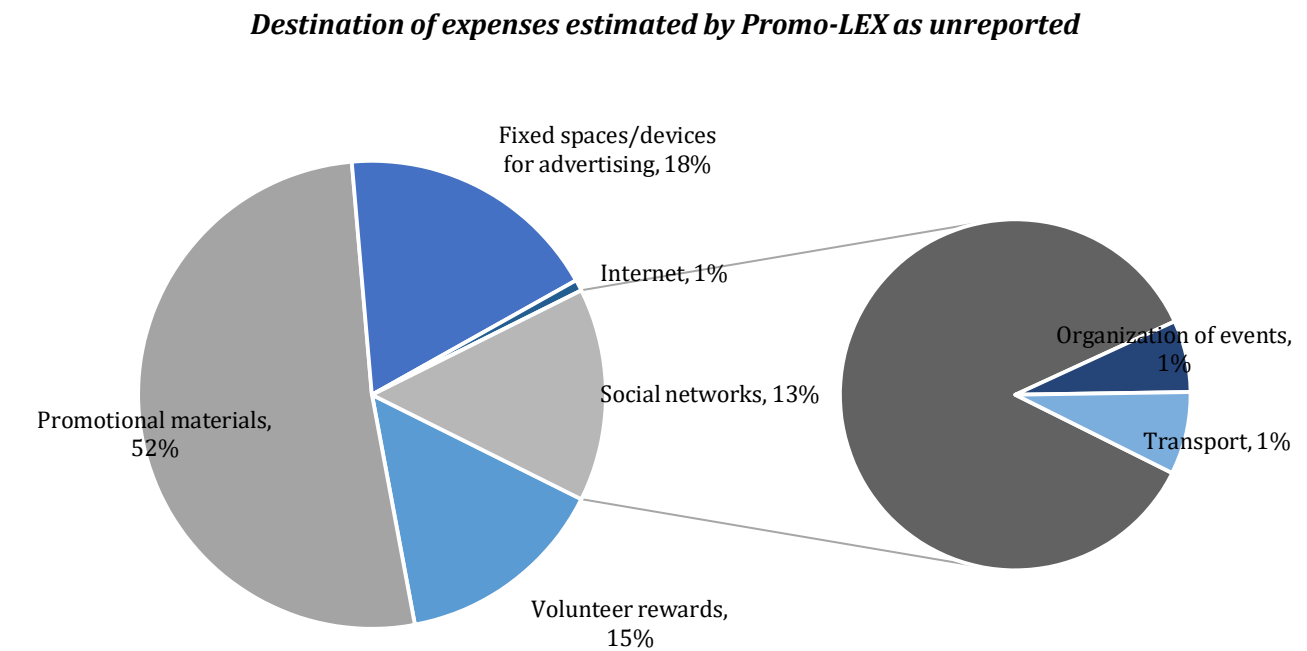
were in the case of the IGs of Irina Vlah (IC) – 43% of the total estimated expenses, followed by Maia Sandu (PAS) – 23%, and Octavian Ticu (Together EB) – 9% of expenses (see Graph no. 11).

Graph no. 11



In terms of the destination of expenses estimated as unreported, the most were for promotional materials – 52%, followed by rewards for volunteers/agitators – 15%, and for fixed spaces and devices for advertising – 18% (see Graph no. 12).

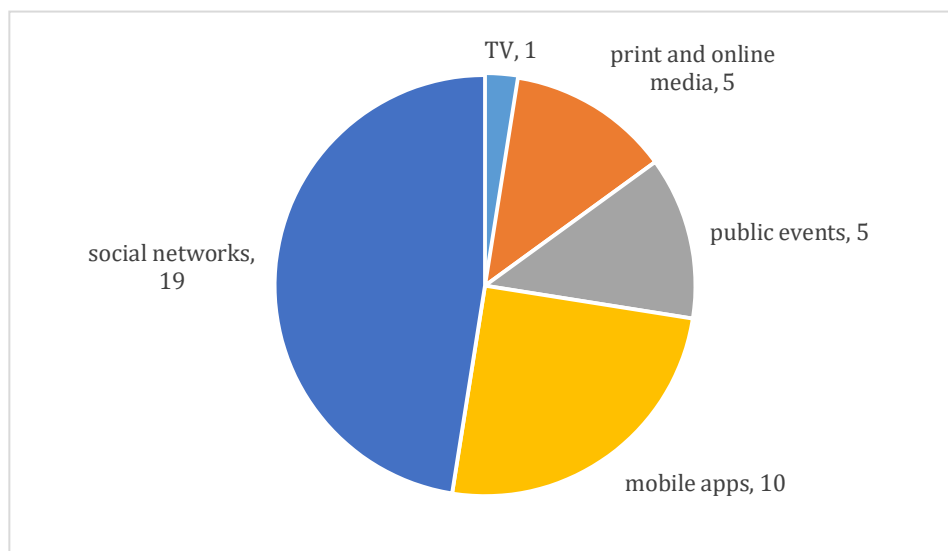
Graph no. 12



## VII. HATE SPEECH AND INCITEMENT TO DISCRIMINATION

Between 20 August and 8 September 2024, at least 40 cases of hate speech and other forms of intolerance were identified. Out of the 40 cases, 38 cases took place in a political context and 28 cases took place in an electoral context. Most cases were spread through social media and mobile apps (see Graph no. 13).

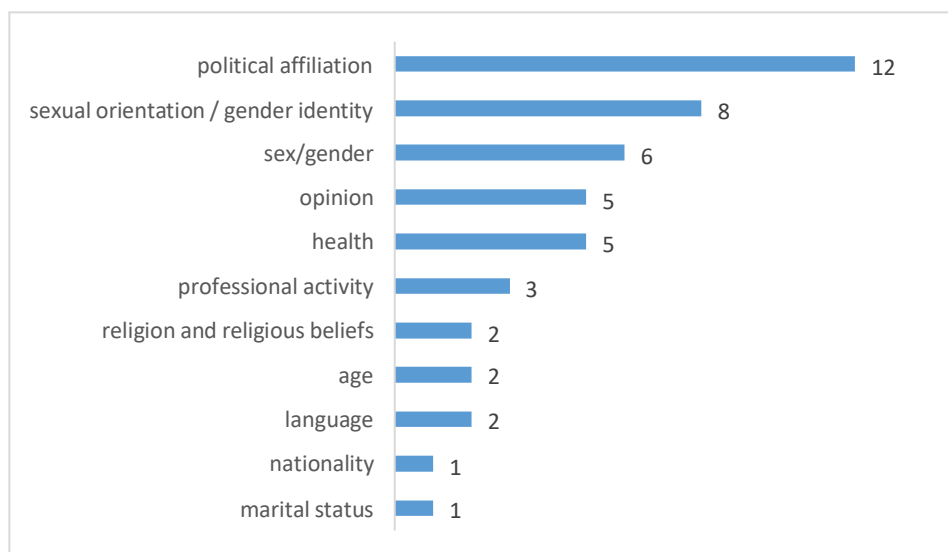
*Graph no. 13. General categories of sources*



Political affiliation, sexual orientation / gender identity, and sex/gender are the criteria behind most cases of hate speech identified during this period (see Graph no. 14). Men (17 cases) aged between 35 and 50 (11 cases) used hate speech most often, 17 cases being generated by representatives of local/central public authorities.

The 40 cases of hate speech have been viewed more than 3 million times and shared more than 23 thousand times.

*Graph no. 14. Criteria behind hate speech*



During the monitoring period, messages were identified that promoted intolerance towards certain social groups, and also messages with a higher level of gravity, such as justification of violence or direct or indirect incitement to discrimination.

### 7.1. Electoral competitors who used hate speech or incitement to discrimination

A speech that dehumanizes and justifies violence against politicians and members of PAS was launched by Renato Usatii, municipal councilor in the Balti city hall, chairman of OP and politician who registered his initiative group to run for President:

*"In short, they (PAS) are no longer a sect, they are a madhouse. They once again, without insecticide, I don't know how we're gonna get rid of them. You know how in the village, when children got lice, they used insect powder on them. Here you have to use both insect powder and some cologne, and after that, preferably some more chemicals. You know? I'm not kidding, these are already aberrations."*<sup>113</sup>

During the election period, homophobic speeches from various actors were also identified. These messages either promoted intolerance towards LGBTIQ+ people through stereotypes and prejudice, or incited discrimination directly or indirectly.

For example, at a press conference, Tudor Ulianoschi, ex-Minister of Foreign Affairs and European Integration of the Republic of Moldova (2018-2019), whose initiative group was registered by the CEC to support his candidacy for the office of President, said:

*"In a normal and dignified Moldova, we will never allow our children to be exposed to dangerous gender propaganda in schools or in public spaces. A normal Moldova is the Moldova of a normal family, a traditional family, of father and mother, not of parent 1 or parent 2. Of little girls, boys, grandfather and grandmother; of baptism, marriage, of the church and the sacrament of Holy Communion."*<sup>114</sup>

Of the 28 cases of hate speech or other forms of intolerance identified in the electoral context, eight cases concerned the association of politicians, members/sympathizers of political parties with mental illness in order to question their mental integrity and intellectual capacity. The purpose of these associations is to denigrate them, but indirectly these types of messages promote stereotypes about people suffering from mental illness.

For example, in the context of a protest organized by representatives of the Victory PB and broadcast live on TV6 channel's Facebook page, a supporter of the political bloc on the one hand associated the counter-demonstrators with mental illness and dehumanized them, and on the other hand incited violent actions against them based on the criterion of opinion:

*"I want all the respected and noble people, who most likely came out when the Costiujeni mental hospital was closed... Look, can you see they were released? If you see three animals on the news, walking around the city, know this! I want us to tell them: Down with the provocateurs! Down with the provocateurs! Put the provocateurs in a ward!"*<sup>115</sup>

Vasile Bolea, a member of the Parliament of the Republic of Moldova and of the political bureau of the RP, used the same rhetoric. He questioned the mental integrity of PAS MP Oazu Nantoi following his statement on the neutrality status of Moldova:

*"Every time Oazu Nantoi goes to the doctor and sees that his tests are bad, he gives out some crazy idea, throws it into society so that we can discuss it. The other day, Oazu Nantoi spoke about the fact that our country must renounce its status of permanent neutrality and fulfill all the measures or all requirements to join NATO."*

*"And I noticed that when Oazu Nantoi receives negative results from the tests he made, and when every time he visits the doctors, he comes up with such crazy ideas that society has to abandon and not even comment on them."*<sup>116</sup>

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<sup>113</sup> Renato Usatii, [online show](#) "Online! Puterea e în adevăr 38!", YouTube, 1 September 2024, min.: 24:13, last accessed: 11 September 2024.

<sup>114</sup> Tudor Ulianoschi, [Press conference](#) on the creation of the initiative group for the nomination and support of the candidacy for the office of President of the Republic of Moldova, Facebook, min.: 17:25, last accessed: 11 September 2024.

<sup>115</sup> Supporter of Victory PB, protest, [Facebook](#), TV6, 21 August 2024, min.: 01:29:50, last accessed: 11 September 2024.

<sup>116</sup> Vasile Bolea, video statement, [Facebook](#), 22 August 2024, min.: 00:01 and min.:03:18, last accessed: 11 September 2024.

## **RECOMMENDATIONS**

### **To the Parliament of Moldova:**

1. To regulate conditions for the participation of the incumbent President (at the end of his term) in the presidential election.
2. To regulate cases of refusal to register initiative groups, so that the regulatory framework is predictable for the actors of the electoral process.

### **To the Government of Moldova:**

3. To renounce sending to the Parliament the draft law amending the Contravention Code in the part referring to the amendment of art. 53 para. (3) of the Contravention Code.

### **To the Central Electoral Commission:**

4. To provide lower electoral bodies with all conditions necessary for their proper operation.
5. To provide training for new members confirmed in the composition of electoral councils.
6. To proactively publish detailed and complete information on the process of organization and conduct of elections.
7. To regularly update the institution's web page dedicated to complaints and acts of their resolution during the election period.
8. To monitor compliance with legal provisions on the organization and conduct, during the election period, of all types of opinion polls on the political preferences of voters.
9. To organize and conduct, in collaboration with the Bureau for Reintegration Policies, an electoral information and education campaign for voters from localities on the left bank of the Dniester.
10. To inform the authors of appeals/complaints about ways of appeal.

## ABBREVIATIONS

AC – Audiovisual Council  
ALDE - Alliance of Liberals and Democrats for Europe  
art. – article  
ATU – administrative-territorial unit  
AUR – Alliance for the Union of Romanians  
CEC – Central Electoral Commission  
ChP – Chance Party  
CICDE – Center for Continuous Electoral Training  
CUB – Coalition for Unity and Welfare  
DEC – second-level district electoral council  
EB – electoral bloc  
EGP – Ecologist Green Party  
ESDP – European Social Democratic Party  
EU – European Union  
FMP – Future of Moldova Party  
IC – independent candidate  
IG – initiative group  
IPP – Institute for Public Policy  
ISS ESCL - information subsystem “Electronic signatures collecting list”  
lit. – letter  
LPA – local public administration  
LTO – long-term observer  
MAN – National Alternative Movement  
MFA – Ministry of Foreign Affairs  
mln – million  
no. – number  
OM – Observation Mission  
OP – Our Party  
OSCE/ODIHR – OSCE Office for Democratic Institutions and Human Rights  
PACE – Building Europe at Home Party  
para. – paragraph  
PAS – Action and Solidarity Party  
PB – political bloc  
PCRM – Party of Communists of the Republic of Moldova  
PDCM – Party of Development and Consolidation of Moldova  
PEB – precinct electoral bureau  
POB – Public Opinion Barometer  
PP – political party  
PPDA – Democracy at Home Party  
PPPDA – Dignity and Truth Platform Party  
PS – polling station  
PSRM – Party of Socialists of the Republic of Moldova  
pt. – point  
RMM – Respect Moldova Movement  
RP – Revival Party  
SCL – signatures collecting list



SRV – State Register of Voters

STO – short-term observer

USAID – United States Agency for International Development

## ANNEXES

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

*Table no. 1.1. Observers accredited by the CEC<sup>117</sup>*

<b>National observers</b>				<b>Total</b>
Promo-LEX Association	633	Association for Participatory Democracy "ADEPT"	5	<b>643</b>
Public Association ADOR ORAȘUL MEU [I Love My City]	5			
<b>International observers and experts</b>				
Embassy of the Republic of Lithuania	6	Central Electoral Commission of the Republic of Lithuania	2	<b>76</b>
Permanent Electoral Authority of Romania	1	Central Election Commission of the Republic of Latvia	1	
Supreme Election Council of the Republic of Turkey	2	Central Election Commission of Georgia	2	
OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR)	38	Central Election Commission of the Republic of Azerbaijan	2	
European Network of Election Monitoring Organizations (ENEMO)	7	National Democratic Institute for International Affairs	15	

*Table no. 1.2. Journalists confirmed by the CEC<sup>118</sup> and DEC's*

Private Institution "Radio Orhei"	1	Independent Periodical Publication "Observatorul de Nord"	8
Independent Periodical Publication "Ecoul Nostru" SRL	6		
		<b>Total</b>	<b>15</b>

*Table no. 1.3. Authorization of opinion polls and exit polls<sup>119</sup>*

<b>Authorization to conduct opinion polls</b>	<b>9</b>
"INTELLECT GROUP" SRL	1
"DATE INTELIGENTE" SRL	3
"MLD MEDIA" SRL	2
Mixed Enterprise "C.B.S.-RESEARCH" SRL	2
Public Association "Aripi de viață"	1
<b>Authorization for publication of opinion polls</b>	<b>1</b>
Public Association "Institute for European Policies and Reforms"	1

*Table no. 1.4. Approval of public interest messages<sup>120</sup>*

Diaspora Relations Bureau	2 video spots
Bright Communications (Realitatea TV Media Group)	3 motivational video spots
Public Association "Comunitatea Plus"	1 information leaflet
Central Electoral Commission	3 video spots 1 information leaflet 1 information poster
Council of Europe Office in Chisinau	1 information video spot
<b>Total</b>	<b>12</b>

<sup>117</sup> [Accreditation](#) of observers.

<sup>118</sup> [Confirmation](#) of journalists.

<sup>119</sup> [Authorization](#) of opinion polls and exit polls.

<sup>120</sup> [Approval](#) of public interest messages.

*Annex no. 2. Ministry of Foreign Affairs estimates on citizens abroad*

<b>No.</b>	<b>Country</b>	<b>Data of the Ministry of Foreign Affairs and European Integration 2020</b>	<b>Data of the Ministry of Foreign Affairs 2024</b>	<b>No.</b>	<b>Country</b>	<b>Data of the Ministry of Foreign Affairs and European Integration 2020</b>	<b>Data of the Ministry of Foreign Affairs 2024</b>
1.	Austria	1,409	5,000	24.	Ireland	1,987	33,000
2.	Azerbaijan	119	200	25.	Iceland		600
3.	Belarus	2,974	5,000	26.	Israel	18,000	20,000
4.	Belgium	7,000	12,500	27.	Italy	128,979	300,000
5.	Bosnia and Herzegovina		50	28.	Japan	188	400
6.	Bulgaria	5,000	3,626	29.	Latvia	363	436
7.	Canada	50,000	26,070	30.	Lithuania	729	1,500
8.	Czechia	5,903	10,000	31.	Luxembourg	600	196
9.	China	178	260	32.	United Kingdom	24,000	35,000
10.	Cyprus	10,000	3,250	33.	Norway	260	3,000
11.	South Korea		200	34.	Poland	37,338	37,277
12.	Croatia	48	150	35.	Portugal	5,098	32,000
13.	Denmark	1,194	2,400	36.	Qatar	139	200
14.	Switzerland	529	7,000	37.	Netherlands	986	5,000
15.	United Arab Emirates	1,410	3,000	38.	Romania	19,400	14,017
16.	Estonia	400	2,000	39.	Slovakia		1,386
17.	Russian Federation	356,731	260,000	40.	Slovenia		500
18.	Finland	400	700	41.	Spain	18,537	23,783
19.	France	17,000	160,000	42.	USA	47,767	130,000
20.	Georgia	57	50	43.	Sweden	248	2,500
21.	Germany	20,375	92,600	44.	Turkey	7,942	9,000
22.	Greece	7,196	13,500	45.	Ukraine	23,800	25,693
23.	India		200	46.	Hungary	680	1,000

Erratum: Due to an admitted error, in Report no. 2 of the Presidential Election Observation Mission and the Constitutional Republican Referendum of October 20, on page 37, the following text was included: "On August 30, 2024, PAS MP Ersilia Qatrawi, a member of the Maia Sandu Initiative Group, collected signatures inside the town hall of Răscăieți, Ștefan Vodă district, during the institution's/employee's working hours." We would like to correct this information by stating that MP Ersilia Qatrawi was not involved in the signature collection process in Răscăieți, Ștefan Vodă district, and the text and figures have been appropriately adjusted.