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FINAL REPORT

Observation Mission General Local Elections and New Parliamentary Elections of 20 October (3 November) 2019

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Advancing democracy and human rights

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The report is drafted within the Observation Mission of the General Local Elections and New Parliamentary Elections of 20 October 2019, carried out by the Promo-LEX Association with the financial support of the US Agency for International Development (USAID) through the „Democracy, Transparency and Responsibility” Program, while the „Hate Speech and Incitement to Discrimination” compartment is supported by the Soros Foundation-Moldova through the project „Strengthening the platform for development of activism and education of Human Rights in the Republic of Moldova”.

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

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EXECUTIVE SUMMARY

Political Context. 898 offices of mayor and 11 580 offices of first-level and second level local councillors (100 less than in 2015) were to be taken up in the general local elections of 20 October 2019. The term of office of the local elected officials shall be four years.

The pre-election period was marked by the delay in the process of forming the parliamentary majority, namely by uncertainties regarding the date for holding the general local elections. The 2019 local elections were held mainly on an idealistic background characterized by topics on oligarchization/state capture or efficient management of administrative-territorial units and not on geopolitical issues, as in the previous local elections. The party-switching in respect of the local elected officials was a distinguishing feature of the relations established in the political-administrative system during the inter-election period (2015 - 2019).

The post-parliamentary elections political developments in the context of the mixed-member electoral system have led to new parliamentary elections in four uninominal constituencies held on the same day as the general local elections.

Legal Framework. Just four of the 16 recommendations for the amendment of legislation formulated by the Promo-LEX Election Observation Mission (EOM) in the previous general local elections (2015) have been completed. Among the major issues, which have remained unresolved and have had negative impacts on the general local elections of 20 October 2019 were as follows: uncertainties as to determining the date of the elections; unequal treatment of independent candidates in relation to those nominated by political parties/ electoral blocs by requiring them to collect signatures; the excessive number of signatures in the subscription lists required for independent candidates in Chisinau and Balti; the lack of a clear legal mechanism to prevent “the artificial migration of voters”; the absence of explicit regulations on the date of commencement of the second round of elections.

As to the holding of the new parliamentary elections on the same day with the local ones, the Promo-LEX EOM considers that CEC were to set the date of the elections between 7th of September 2019 – 7th of October 2019.

The Promo-LEX EOM states that the approval by the Parliament of the multiple amendments to the existing legal framework (15.08.2019) in the election campaign for the new parliamentary elections and near the beginning of the election campaign for the general local elections had a negative impact on the fairness and predictability of the electoral process. Moreover, due to the application of the legislative norms amended in parallel for two types of elections held on the same day, the Promo-LEX EOM found that the organization of the electoral process was complicated and accompanied by uncertainties.

It was also found that, during the election campaign the legal rules for verifying the validity of signatures collected in different parts of the country and included in the same list have been misapplied. This has unjustifiably led to the refusal to register independent candidates in certain electoral constituencies and, on the contrary, to register candidates in other constituencies. It should also be pointed out that the special rule under which the right to vote in local elections is conditioned by the criterion of the voter’s domicile, and not that of the residence of the latter, however, it is not applied by the electoral bodies in the proper way in the local elections. The Promo-LEX EOM believes that the CEC’s legal rules and regulatory framework must be sufficiently explicit to allow the exit polls to be conducted on the election day for relevant organizations.

Electoral Bodies. Local elections are more complex in terms of organizing the work of electoral bodies. On the eve of the election period, 1/3 of the CEC’s membership was modified, being elected a new one. The Promo-LEX EOM has found that the CEC partially complied with the provisions of law on decisional transparency in the decision making adoption process.

All lower electoral bodies for local elections (DEC II and I, PEB), except for DEC Bender, have been established within the legal deadlines. As for DEC I, the deadline for the appointment of the membership had not been observed in around 35% of the councils, while for PEB's membership – in 11% of the bureaus. The procedure for secret ballot vote has been violated in 12% of the DECs I, whilst the procedure for open ballot vote – in 7% of the PEBs. Permanent change in the composition of the lower electoral bodies remains a problem of the electoral process.

The working programme was permanently observed by the DEC II, at the same time, following three visits made therein, 3% of the DECs I and 22% of the PEBs were always closed. The structure of the electoral bodies is generally unbalanced from the point of view of gender equality: starting from PEB where 85% of employees are women and only 15% men, and ending with CEC where 100% of employees are men. The Promo-LEX EOM qualifies less than half of the headquarters belonging to the lower electoral bodies (47%) as accessible or partially accessible to persons with special needs.

In the opinion of the Promo-LEX EOM the establishment of PSs for the new parliamentary elections in those for SMCs took place with deviations from legal provisions, including in the light of transparency of the decision-making process.

Accreditation of Observers. Limiting the access of observers to the electoral documentation.

For the general local elections and new parliamentary elections of 20 October 2019, the CEC accredited 1 801 observers/experts, of which 1661 were national and 140 – international. Compared to the general local elections of 14 June 2015, for the elections of 20 October 2019, the CEC accredited with 636 observers less. Such difference is largely due to the fact that in 2019, Promo-LEX accredited 1109 observers, with 894 less as compared to local elections of 2015 (2003 observers).

The CEC has amended the Regulation on the Status of Observers and the Procedure for their Accreditation so as to simplify the procedures for accreditation as well as to ensure the right to make any observations including the ones during the elections day.

The Promo-LEX observers have been intimidated during their activity in the following circumstances: electoral rolls; subscription lists; complaints; financial reports of independent candidates.

Electoral Complaints. In the context of the general local elections, the Promo-LEX EOM has identified and analyzed at least 283 complaints lodged with electoral bodies: CEC (53), DEC II (194) and DEC I (36). Most of the complaints (58%) have been lodged against actions/failures to take action as well as against the decisions of the electoral bodies. The main topics of complaints lodged therein were: registration/lack of registration of electoral competitors (34%), the use of administrative resources (16%) as well as the conduct of the illegal electoral agitation (15%). The electoral bodies have granted their approval in respect of only 12% of the aforementioned complaints.

The Mission also draws special attention to: the practices of differentiated treatment of similar situations by different electoral bodies; the unfounded nature of certain decisions of the electoral bodies; incomplete transparency and limited access to complaints and materials thereof in regards to certain electoral bodies, etc.

Designation and registration of competitors. 26 political parties and one electoral bloc of which 17 have entered at least one mayor's office: PDM (261), PSRM (205) and ACUM Electoral Bloc (173) have participated in the local elections. Of the total of 898 mayors elected therein, 112 (12%) are independent candidates. Women remain underrepresented in the context of the majority vote for the post of mayor: only 22% (195) are women. Compared to the general local elections of 14 June 2015, in at least 52 ATUs I and two ATUs II the number of local councillors has been reduced, while in eight ATUs I their number has been increased.

Compared to the candidates belonging to parties/blocs, the independent ones, especially those in Chisinau municipality and Balti municipality are being disadvantaged in the registration process by the binding requirement to collect signatures in support of their candidacy. Other issues found in the registration process are linked to the differentiated approaches of the electoral bodies in dealing with similar situations: observing

the gender quota in the councilors' lists; registration of candidates on the basis of the Designation Minutes adopted before the legal deadline set forth in respect thereof; the obligation for a list to include only signatures of the supporters residing in a single settlement.

29 candidates belonging to 9 parties/to an electoral bloc as well as independent candidates in four SMCs have been registered as participants in the new parliamentary elections. The elections held in the aforementioned four SMCs have been won only by the representatives of parties/bloc: ACUM (2), PSRM (1) and PDM (1).

Voters' Lists. The continued increase in the number of voters in the State Registry of Voters (SRV) against the background of a negative natural population growth in the Republic of Moldova from 1999 onwards, has raised uncertainty again in the context of current elections as to the quality of management of the State Registry of Population (SRP), and, implicitly, of the SRV.

The accessibility of citizens to the voters' lists increased by developing a restricted version of the basic lists (first name, last name, the year of birth) and ensuring accessibility thereof on both the CEC's website as well as in the PSs. On the same lines, the Promo-LEX EOM contests the limitations on the access of observers to basic voters' lists in full format, on the grounds of the existence of those in a restricted format.

The Promo-LEX EOM continue to reveal problems with the quality of basic voters' lists: deceased persons, wrong attribution of voters, non-inclusion of voters in the basic voters' lists, etc. The artificial migration of voters has been observed in these elections as well. Minimum three requests for domicile registration have been identified in at least 29 ATUs I, whilst the number of voters on the additional lists was equal to or greater than the difference of votes between the first two candidates in at least 19 SMCs I.

Public Administration. LPA has been involved in activities of organizing the elections of 20 October 2019 through the achievement of competences set forth by the electoral legislation: appointment of DEC and PEB members; providing the lower electoral bodies with premises and materials necessary for the performance of their work; ensuring special places for electoral displays and locations for voter meetings; participating in the verification of the SRV.

We draw the reader's attention to the fact that, according to observers, about 39% of the LPA did not approve decisions on electoral displays as well as 56% of the LPA did not approve the decisions on the venues for meetings with voters. And more LPAs – about 50% – did not disclose these decisions. The Promo-LEX EOM believes that ignoring the respective legal provisions affects citizens' level of information on the conduct of electoral processes.

It is worth recalling that the LPA does not comply with the legal provisions concerning the requirement for publication of the financial reports of independent candidates on the relevant website. Moreover, we are of the opinion that LPAs, especially level II LPAs, due to the fact that they have such a website, the latter must ensure the publication in full of the information about all candidates falling within their area of competence. Of 32 websites belonging to district councils, only Floresti LPA has published the decisions on the establishment of DEC I. Also, the district councils have failed to publish the financial reports of independent candidates on their websites.

Electoral Competitors. In general, electoral competitors have displayed increased activism during the electoral campaign being observed at the same time election-related promotion cases before the legal deadline. According to the Promo-LEX EOM, electoral competitors held at least 2 404 promotional activities the most frequent types being as follows: meetings with voters (33%), distribution of electoral materials (23%) and posting electoral materials (22%). Unlike the local elections of 2015, the share of such activities declined to around 10 times of their total.

The electoral campaigns have been marked again by an increased use of administrative resources. According to the Promo-LEX EOM, 191 cases have been reported therein, most of which refer to conducting electoral meetings with the employees of public institutions during working hours. However, compared to the parliamentary elections of 24 February 2019, their number has decreased by more than 3 times.

Also during the electoral period the Promo-LEX observers reported at least 34 cases that can be qualified as gift offerings, almost six times less than in the parliamentary elections.

Other identified violations are as follows: the use of electoral advertising in violation of the applicable legal provisions (171 cases); promotion of candidates with the use of the image of personalities from abroad (10 cases); the use of public authorities' image in electoral campaigning (10 cases); use of violence in electoral campaigning (5 cases).

Financing of Electoral Campaigns. There has been found a high degree in relation to the submission of financial reports by electoral competitors with the CEC. On the same lines, only 20% of IC have submitted their reports with DEC. The total amount of revenues and expenditures reported by 22 electoral competitors registered therein (parties as well as other social and political organizations, electoral blocs) for the entire electoral campaign (round I and II) is MDL 19 759 736. These consist namely of own funds available in the accounts of political parties (55%) as well as financial donations made by natural persons (40%). The Promo-LEX EOM warns about the need to declare the value of material donations to the balance sheet of the financial report, in the section entitled *turnover of financial resources*.

Also the Promo-LEX EOM found that an amount of MDL 6 104 594 was unreported. Thus, 26 electoral competitors failed to report in full the expenditures incurred by them during the electoral campaign. They are as follows: PSRM, PDM, ACUM Bloc, PPS, PUN, PCRM, PL, PN, USB, PPEM, PPR, IC Turturica Natalia, IC Rusu Vasile, PPVP, IC Dandis Nicolae, PNL, IC Nicolae Balaur, PPM, PPDA, POM, IC Moruz Dumitru, PVE, PAD, IC Valeriu Dragan, PSE, MPA. Of these, PSRM failed to report at least MDL 3 515 587, PDM – MDL 844 706, ACUM Bloc – MDL 490 668, PPS – MDL 404 245.

According to Promo-LEX observers, the electoral competitors failed to report in full at least MDL 2 220 500 in the section related to street advertising, namely for the remuneration and posting of volunteers/observers and representatives entitled to consultative vote in the amount of at least MDL 1 432 754. At least MDL 1 103 514 have not been reported in case of electoral events/concerts, and at least MDL 929 742 have not been reported in case of the rental lease and maintenance of campaign headquarters.

Hate and Discriminatory Speech. In this electoral campaign, competitors continued to use hate speech and elements of discrimination, the situation being comparable to that of the previous parliamentary elections. In terms of types of hate speech, the most prevalent are sexist prejudices, gender stereotypes in society and prejudices among people with mental health problems.

According to Promo-LEX, in 26 cases, the candidates were directly targeted by hate speech messages by public figures or other competitors (PL – 10 cases; PN – 10 cases, ACUM Bloc – 3 cases; PLDM – 1 case; PPDA – 1 case and USB – 1 case). Also, there were at least 11 situations, where electoral competitors generated messages that incite hatred and discrimination (PSRM – 4 cases; ACUM Bloc – 2 cases; PL – 2 cases; PN – 1 case; PPS – 1 case; IC – 1 case).

Voter Education and Electoral Training Activities. In the context of the first and second rounds of general local elections, the Promo-LEX Association carried out the Campaign “I vote for...” aimed at information, electoral education and apolitical mobilization of the citizens of the Republic of Moldova holding voting rights, which included: door-to-door information activities; electoral public debates; TV and radio electoral debates in partnership with TV Moldova 1 and Radio Moldova public channels; making and promoting video clips. Also, in the context of parliamentary elections, in partnership with TV Moldova 1 and Radio Moldova public channels, debates were held on TV and radio with the participation of candidates in all four uninominal circumscriptions running for MPs.

The CEC and CICDE conducted trainings for electoral officials and further categories of participants in the electoral process as well as trainings on information of voters. The parties who have received training were as follows: members of lower electoral bodies, DEC's operators, accountants, treasurers of electoral competitors, etc. The CEC and CICDE organized the voter information and education campaign “I choose to vote! Indifference DOES NOT bring any changes”, via mobile teams, and video spots broadcast both online, and on TV.

The Promo-LEX EOM notes the absence in the context of new parliamentary elections of a CEC's campaign to inform the voters living abroad and those residing on the left bank of Dniester.

Election Day. On the 20th of October 2019, the Promo-LEX EOM observed both the general local elections and new parliamentary elections in 794 PSs via the static observers delegated in respect thereof. In the second round of local elections of 3rd November 2019, the voting process was observed via the static observers in 307 PSs established in Chisinau constituency. In both ballots, the voting process has been monitored by 41, respectively, 39 mobile teams of observers. The closure and opening of polling stations have generally been carried out without incidents. The accessibility of PSs for voters with locomotor impairments remains an unresolved issue. Securing the PSs' heat supply has been deficient, in particular in PSs located outside Chisinau municipality. At the same time, the Promo-LEX EOM repeatedly warns of a non-compliance by the PEBs with all the regulatory requirements for the vote counting process.

563 incidents have been reported during these two ballots (first round – 405, second round – 158), decreasing compared to the parliamentary elections of 24 February 2019 (1118 incidents). The Promo-LEX EOM draws attention to the fact that in at least 18 cases, the Mission's observers were restricted to observe freely the electoral procedures, as well as receiving the minutes on vote counting. In quantitative terms, the most frequently reported incidents were: unjustified presence of unauthorized persons in the PS or within 100 m from it (71) as well as deficiencies in voters' list (69). The Promo-LEX EOM additionally warns against cases of electoral agitation on the election day – 31 as well as rumours/ material rewards offered to voters – 16 cases.

The results of the parallel vote counting performed by the Promo-LEX EOM for the posts of mayor of Chisinau municipality, Balti and Comrat show insignificant differences from the results announced by the CEC, which does not influence the placement of competitors on the basis of the final data. It is also worth mentioning that the share of minutes filled out by PEBs with mistakes in the verification formulas has decreased compared to parliamentary elections of 24 February 2019.

INTRODUCTION

The Election Observation Mission of the general local elections and new parliamentary elections of 20 October (3 November) 2019 is a project carried out by the Promo-LEX Association within the Civic Coalition for Free and Fair Elections. The Promo-LEX Association is a public association that aims at developing democracy in the Republic of Moldova, including the Transnistrian region, by promoting and defending human rights, monitoring democratic processes and strengthening civil society.

Monitoring of the electoral process was carried out during the electoral period by 41 long-term observers (LTOs), whilst for the day of 20th October 2019, the Promo-LEX EOM delegated static short-term observers (STOs) one for each of the polling stations (PSs) selected on the basis of a sample established by a sociological company. STOs observed the voting process in each of the PSs located in Chisinau municipality, Balti municipality and Comrat. In the second round of local elections, the static STOs have observed the voting process in 307 PSs established on the territory of Chisinau municipality. Also, on the election day, the aforementioned processes have been observed by the mobile teams of the Promo-LEX EOM – 41 on 20th of October 2019 and 39 in the second round of local elections (3 November 2019).

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

The report is drawn up based on the observation reports and the findings of the LTOs introduced into the thematic templates, as well as on official public information reported by Promo-LEX EOM observers.

The Promo-LEX EOM is not the political opponent of the competitors involved in the electoral race, it is not an investigative body and does not assume the express obligation to prove the observed findings. However, observers' reports shall be accompanied, as far as possible, by photographic and video evidence, which can only be made available to law enforcement authorities on the basis of appropriate requests and in no case shall it be made available to electoral candidates. At the same time, the violations, including the alleged ones, that are found in this report must be dealt with by the electoral authorities in the light of the provisions of art. 22 para. (1) letter q) and art. 68 para. (5) Electoral Code, including as notifications made by observers to be examined according to their competence.

The Promo-LEX Mission manages the www.monitor.md, web platform, where any citizen can report activities with electoral overtones, the information from observers' reports being stored on the same platform. Citizens' notifications are verified by the Mission Observers during the next scheduled visit to the settlement, where the alert was recorded.

The Promo-LEX Association organizes Election Observation Missions in the Republic of Moldova since 2009, the mission observing the general local elections and new parliamentary elections of 20 October (3 November) 2019 being the 18th. Additionally, the employees and members of the Association have extensive international experience and participated in election observations in the International Missions of Armenia, Estonia, Georgia, Germany, Macedonia, United Kingdom, Norway, Romania, Sweden, Ukraine, etc.

Since 2005, Promo-LEX is a member of the Coalition for Free and Fair Elections. In 2009, the Association became a member of the European Network of Election Monitoring Organizations (ENEMO), becoming a member of the Global Network of Domestic Election Monitors (GNDEM) in 2010, and in 2013 – the founding member of the European Platform for Democratic Elections EPDE).

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

The report is drafted within the Observation Mission of the general local elections and new parliamentary elections of 20 October 2019 carried out by the Promo-LEX Association with the financial support of the US Agency for International Development (USAID) through the Democracy, Transparency and Responsibility Program while the „Hate Speech and Incitement to Discrimination” compartment is supported by the Soros Foundation-Moldova through the project „Strengthening the platform for development of activism and education of Human Rights in the Republic of Moldova”.

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I. POLITICAL CONTEXT

898 elective offices of mayor and 11 580 offices of local councillors of which 1 108 (eight less than in 2015) in 34 councils of ATUs II and 10 472 (92 less than in 2015) in 896 councils of ATU I were to be taken up in the general local elections of 20 October 2019¹.

The pre-election period was marked by *the delay in the process of forming the parliamentary majority*, event, which caused *uncertainties with respect to the date for holding the general local elections*². By Parliament’s Decision no. 53 of 18 June 2019, date for holding the general local elections has been set for 20 October 2019. For the first time the interval between the expiration of term of office of the local elected official and date of the elections was that great, that it exceeded the period of four months³.

Also, the political context of the general local elections was influenced by the formation of a new parliamentary majority (PSRM, PAS, PPPDA) and by the PDM opposition (governing party since 2009) as well as by the PPS opposition. *The resignation of three CEC members* of the total of nine members, among whom were the president and deputy president also took place against the background of the political changes occurred therein. The secretary of the aforementioned institution also resigned from his/her administrative post.

Under the conditions of a new government, which was not based on the proximity of the declared geopolitical messages, the local elections of 2019 were held mainly on an ideological background characterized by topics on oligarchization/state capture or efficient management of ATUs and not by geopolitical issues, as in the previous local elections⁴.

As in the case of MPs of the XX legislature (2014 – 2018)⁵, *the party-switchin* has also been the key element in the relation of political forces at the level of local governance in the period between local elections of 2015 and those planned for 20 October 2019⁶.

As a consequence of the political processes of forming a new parliamentary majority in the context of the implementation of the legal provisions regarding the mixed electoral system⁷, on 26 July 2019, the Parliament of the Republic of Moldova adopted decisions under which note has been taken of the resignations of four MPs elected in the uninominal circumscriptions no. 17, no. 33, no. 48 and no. 50. Thus, on 31 July 2019, CEC has set the date of 20 October 2019 for holding and conducting the new parliamentary elections, simultaneously with the general local elections in four of the aforementioned uninominal circumscriptions.

1. CEC Decision no. 2573 of 16.08.2019 on determining the number of political mandates of local councillors in the general local elections of 20 October 2019. <http://bit.ly/2lALh2Q>

2. The general local elections of 20 October 2019 were held about eight months after the parliamentary elections of 24 February 2019. On the 9th of March, the MPs’ mandates have been validated by the Constitutional Court, however a new government was voted into power on 8 June 2019.

3. On 14 June 2015, the last general local elections were held, during which the local public administration was elected for a four-year term of office. Therefore, the aforementioned term of office expired in June 2019, and general local elections were to be held.

4. OSCE/ODIHR Limited Election Observation Mission. Final Report. Local Elections, 14 and 28 June 2015. Republic of Moldova, p. 4 <http://bit.ly/2LXjpBw>

5. Final Report of the Observation Mission of Parliamentary Elections of 24 February 2019, p. 13. <https://bit.ly/31dbx3a>

6. Report no. 1. Promo-LEX Election Observation Mission of general local elections and new parliamentary elections of 20 October 2019, pages 9-10. <http://bit.ly/2kpYRpL>

7. According to art. 105, para. (1) of the Electoral Code, if the office of an MP has become vacant, the CEC shall set the date of the new elections within at least 60 days from the vacancy, but no later than more than 3 months from that date.

II. LEGAL FRAMEWORK

2.1. The degree of implementation of the recommendations formulated by the Promo-LEX Election Observation Mission in the general local elections of 14 June 2015

Of the total of 16 recommendations for the amendment of legislation formulated by the Promo-LEX Election Observation Mission (OM) in the previous general local elections (2015) only four were fully or partially implemented. Among the major issues, which have remained unresolved in the context of the local elections of 20 October 2019 were as follows: uncertainties as to determining the date of the elections and establishing the electoral period, the lack of a clear legal mechanism to prevent “the artificial migration of voters”, voting regime for voters with no domicile or residence, the lack of general or special rules in the Electoral Code regarding the conduct of the second round of local elections, compliance with the provisions of the Electoral Code by the electoral bodies in the context of the use of certificates for the right to vote by the voters, etc.⁸

The Promo-LEX EOM has drawn attention to the fact that the legislation continues to unequally treat the independent candidates, compared to those designated by political parties or electoral blocs, imposing on them only the obligation to collect signatures in the subscription lists. Furthermore, in the opinion of the Mission, the number of signatures requested to be affixed on the subscription lists in Chisinau and Balti municipalities remains to be an exaggerated one.

2.2. Amendments to the legal framework during the ongoing electoral process⁹

On 15.08.2019 the Parliament of the Republic of Moldova adopted the Law no. 113 amending some legislative acts¹⁰, published in the Official Gazette and entered into force on 17.08.2019. In the opinion of the Promo-LEX EOM, the approval of the amendments referred to the existing legal framework during the election period have had a negative impact on the fairness and predictability of the electoral process. This is happening at a time when the law amending the Electoral Code was published and, respectively, entered into force in full electoral period in accordance with the calendar approved by the CEC, for new parliamentary elections and near the beginning of the election campaign for the general local elections. Therefore, the CEC got into a difficult situation being forced to comply with the principles of transparency in the decision-making process and principles of public consultation with a view to adjusting its regulations in line with the new amendments made therein.

In addition, due to the amendments made to the Electoral Code within the election period as well as due to their differentiated application in the context of two ballots held on the same day, the Promo-LEX EOM found that the organization of the electoral process was complicated and accompanied by uncertainties.

Amendments made are as follows:

- **Amendments with regard to electoral campaigning:** ban on political campaigning on election day as well as on the day before the elections; the notion of electoral campaigning has been modified in order to restrict the activities that can be qualified as such.
- **Amendments with regard to the financing of electoral campaigns:** the ban on the financing of political parties, initiative groups and electoral campaigns by citizens of the Republic of Moldova from the revenues obtained from abroad was excluded; the ceilings of donations made for an electoral campaign

8. Report no. 1. Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, pages 11-16. <http://bit.ly/2kpYRpL>

9. For details go to: Report no. 2. Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, pages 9-13. <http://bit.ly/35CPN0W>

10. Provisions of the following laws have been amended: Electoral Code, Law on the Status of Members of Parliament, Law on identity documents in the national passport system, Law on Political Parties, the Contravention Code.

has been reduced; the beginning of the period, in which political parties can accept donations only to the “Electoral Fund” account has been modified, etc.

- **Amendments with regard to the designation and registration of electoral candidates:** the provision with regard to the minimum representation quota of 40% for both genders when drawing up the lists of candidates was completed by establishing the positioning of candidates on the lists according to the formula: at least four candidates for every ten seats; the candidates’ obligation to personally submit the statement of consent to run in the elections and the documents necessary for the registration of the candidates was excluded; the certificate of integrity issued by the National Integrity Authority has been replaced with the declaration on one’s own responsibility, etc.
- **Amendments with regard to voting from abroad:** giving CEC the main role in establishing and managing the polling stations abroad; expanding the list of ID documents under which citizens are entitled to vote in polling stations organized abroad, etc.
- **Other amendments:** only normative decisions issued by the CEC shall be published in the Official Gazette; specifying the data in the voters’ lists that can be made accessible in the premises of the polling stations; media service providers have been obliged to carry out and broadcast live debates between electoral competitors only in the prime time, etc.

2.3. Summary of legal issues that arouse during the electoral campaign

In addition to the issues previously identified during the electoral campaign, the Promo-LEX EOM has also found the following:

- the special rule under which the right to vote in local elections is conditioned by the criterion of the voter’s domicile, and not that of the residence of the latter, was not applied by the electoral bodies in the proper way in the local elections;
- incorrect application of the legal rules for verifying the validity of signatures collected in different parts of the country and included in the same list, which has unjustifiably led to the refusal to register independent candidates in certain electoral constituencies;
- the legal rule explicitly allows for the access of the observers to the voters’ lists without any limitations, while the provisions of the CEC’s regulations may not restrict the rights of the observers laid down in the Electoral Code;
- the absence in both the Electoral Code and legal acts belonging to CEC of explicit regulations regarding the conditions for organizing and conducting exit polls on election day;
- the need for explicit rules relating to the presence of electoral advertising as well as unauthorized persons within 100 m from the polling station;
- issuance of decisions to waive the parliamentary immunity of MPs running in the general local elections or directly involved in the process for the appointment of candidates is likely to influence the voter’s opinion in favor/against an electoral competitor.

2.4. Setting the date of new parliamentary elections

On 29 July 2019 the CEC adopted the Decision no. 2543, setting the date of 20 October 2019 for holding new parliamentary elections (simultaneously with the general local elections) to fill the positions of MPs in the uninominal circumscriptions no. 33, no. 48 and no. 50, as well as in the uninominal circumscription no. 17 under the Decision no. 2549 of 31.07.2019. Both decisions adopted by CEC has been published in the Official Gazette on 02.08.2019.

In the opinion of the Promo-LEX EOM, the date of the new parliamentary elections was set in breach of the legal framework. We believe that the Parliament of the Republic of Moldova has delayed the submission of the draft decision regarding the declaration of the vacant mandate in the case of the MPs Andrei Nastase and Maia Sandu, however, as of the date of submission of the requests for resignation until the date of issuing the decisions regarding the declaration of the vacant mandate (26 July 2019), the Parliament held at least four plenary sessions.

Thus, starting from the fact that the mandate of the MPs Andrei Nastase and Maia Sandu ceased in law on 8 July 2019, under art. 105 of the Electoral Code and para. (12) of art. 2 of the Law on the Status of Members of Parliament, ex officio, the Central Electoral Commission were to set the date of new parliamentary elections between 7 September 2019 – 7 October 2019.

III. ELECTORAL BODIES

3.1. Activity of the Central Electoral Commission (CEC)

3.1.1. Structure of Electoral Bodies

Local elections are more complex in terms of organizing the work of electoral bodies. In the context of the local elections of 20 October 2019, the CEC coordinated the activity of all three levels of electoral bodies: level II district electoral councils (DEC II – 35), level I district electoral councils (DEC I – 896) and precinct electoral bureaus (PEB – 1969).

Four District electoral council for Single member constituency (DECs for SMC) and 110 PEBs have been established to hold the new parliamentary elections on the same day as the general local elections.

3.1.2. Composition of the CEC. CEC's decisions

The five-year mandate of the current CEC started in 2016. In the period between 28 June - 4 July 2019, three members of the Commission - Iurie Ciocan (member), Alina Russu (president) and Rodica Ciubotaru (deputy president) - resigned from their offices given the political changes in the society¹¹. Also, Veaceslav Agrigoroae announced his resignation from the position of secretary of the CEC.

On 16 July 2019, the Parliament ignoring the principle of gender balance, confirmed the CEC membership of other three persons, namely Dorin Cimil, Maxim Lebedinschi and Dumitru Pavel for the unexpired term of their predecessors' mandates. On 19 July 2019, a new management of the Commission was elected and appointed. In this way, the electoral authority became functional on the eve of the electoral period. In this context, on 11 July 2019, Promo-LEX launched an Appeal requesting the Parliament to initiate public consultations on the regulation of a new algorithm for appointing CEC members in view of diversifying the subjects who have this right.¹²

During the monitored period, the CEC adopted decisions, which aim at organizing and conducting the general local elections and new parliamentary elections of 20 October 2019, as well as decisions on adjusting the regulatory framework to the changes in the electoral legislation (Annex 1).

The Promo-LEX EOM found that the CEC partially complied with the provisions of law on the decision-making transparency¹³. At the same time, we would like to point out that not all CEC regulations have been adapted to the new legal provisions, which has caused malfunctions in elections.¹⁴

3.1.3. Accreditation of observers

We remind the reader that on the eve of the parliamentary elections of 24 February 2019, the CEC bureaucratized and made more difficult the accreditation process for the national observers. Promo-LEX has repeatedly expressed its disagreement with this Decision, requesting the electoral authority to review the provisions of the Regulation on the status of observers and the procedure for their accreditation¹⁵. As a result,

11. Report no. 1, Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, p. 17. <http://bit.ly/2kpYRpL>.

12. Public appeal on the need to speed up the procedures for the appointment and confirmation by the Parliament of the new members of the Central Electoral Commission (CEC), as well as the election by the CEC members of the management of the authority. <http://bit.ly/2XUBOWL>

13. Report no. 1, Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, p. 18. <http://bit.ly/2kpYRpL>

14. For example, neither the Regulation on the method of placing electoral advertising and political promotion on the advertising panels was adapted nor the provision of section 14 was considered when referring to the ban on political ads in the premises of the electoral councils and bureaus or within 100 meters from them.

15. Public appeal regarding the limited transparency in the adoption and the abusive content of the CEC Decision no. 1694 of 12 June 2018 for amending and supplementing the Regulation on the status of observers and the procedure for their accreditation. <https://bit.ly/2qcHk6L>

in June 2019, the CEC initiated the procedure for amending the Regulation on the status of observers and the procedure for their accreditation. On 2 September 2019, during the electoral period, the CEC has amended the Regulation on the status of observers and the procedure for their accreditation, thus facilitating the procedure for their accreditation, by removing the obligation to submit the form signed by the person whose accreditation is requested, introduced in the context of parliamentary elections of 24 February 2019. Also, the prohibition for observers to comment in public during the election day was replaced with the obligation to refrain from performing the electoral agitation in favor or to the detriment of the electoral competitors.

For the general local elections and new parliamentary elections of 20 October 2019, the CEC accredited 1801 observers, of which 1661 were national¹⁶, including 1109 observers nominated by the Promo-LEX Association and 140 international observers¹⁷. Compared to the general local elections of 14 June 2015, for the elections of 20 October 2019, the CEC accredited with 636 national and international observers less. Such difference is largely due to the fact that for the elections of 14 June 2015, Promo-LEX Association accredited 2003 observers, with 894 less as compared to the elections of 20 October 2019.

At least 2023 observers have been accredited by electoral competitors to monitor the general local elections (see Annex 2) at the level of DEC I and DEC II. The most active competitors were: PSRM (642), PDM (575) and ACUM Bloc (502). Whilst, at the level of DEC for SMC, at least 124 observers have been accredited to monitor the new parliamentary elections (see Annex 2).

3.2. Establishment and operation of the hierarchically inferior electoral bodies

3.2.1. Establishment of electoral constituencies and second level municipal and district electoral councils (DEC II)

On 20 October 2019, in line with the Calendar Program and the legal provisions¹⁸, the CEC constituted 36 second level electoral districts and 35 municipal and district electoral councils (DEC II) for the local elections. The Promo-LEX EOM repeatedly points out that no electoral council has been established for the district no. 3 Bender.

According to the legal provisions¹⁹, DEC II shall be made up of an odd number of members, of at least 7 and at most 11 persons. For the general local elections of 20 October 2019, all DEC II shall be made up of 11 members.

The Promo-LEX EOM generally found the observance of the legal provisions²⁰ with regard to DEC II membership. Thus, we find that each party represented in the Parliament of the Republic of Moldova (the PSRM, PAS, PDM and PPS) appointed one member in the composition of each DEC II, except the PPPDA, which has no members in the DEC II of ATU of Gagauzia no. 36. At the same time, the municipal council did not appoint members to the Electoral Council no. 1, Chisinau, the position being completed from the REO. The same finding refers to DEC of ATUG no. 36, where the People's Assembly of Gagauzia did not nominate any candidate, which required the completion of the position by the REO²¹.

Petition regarding the limitation of observers' freedom of expression on the election day, as well as bureaucratization and unjustified delay of the procedure for accrediting observers. <https://bit.ly/2KAg213>

16. Including 5 national electoral experts accredited by CICDE.

17. Including 27 international electoral experts accredited by certain electoral commissions and authorities based in other countries.

18. According to art. 18, art. 26, para. (1), let. c) and art. 28 of the Electoral Code, point 7 of the Calendar Program for the organization and conduct of the general local elections of 20 October 2019 (<https://bit.ly/2MR2ZLc>) and under Law no. 764/2001 on the administrative-territorial organization of the Republic of Moldova (<https://bit.ly/2TD1eBl>).

19. Art. 28, para. (5) of the Electoral Code.

20. Article 28, para. (5) of the Electoral Code: "the candidacies of 2 members of the second level electoral council shall be proposed by the court or, as the case may be, by the court of appeal, the candidacies of other 2 members - by the local second level councils and The People's Assembly of Gagauzia. The candidacies of other members are proposed by the parties represented in the Parliament, and if it is not sufficient, the remaining number of members shall be completed by the Central Electoral Commission, from the Registry of Electoral Officials".

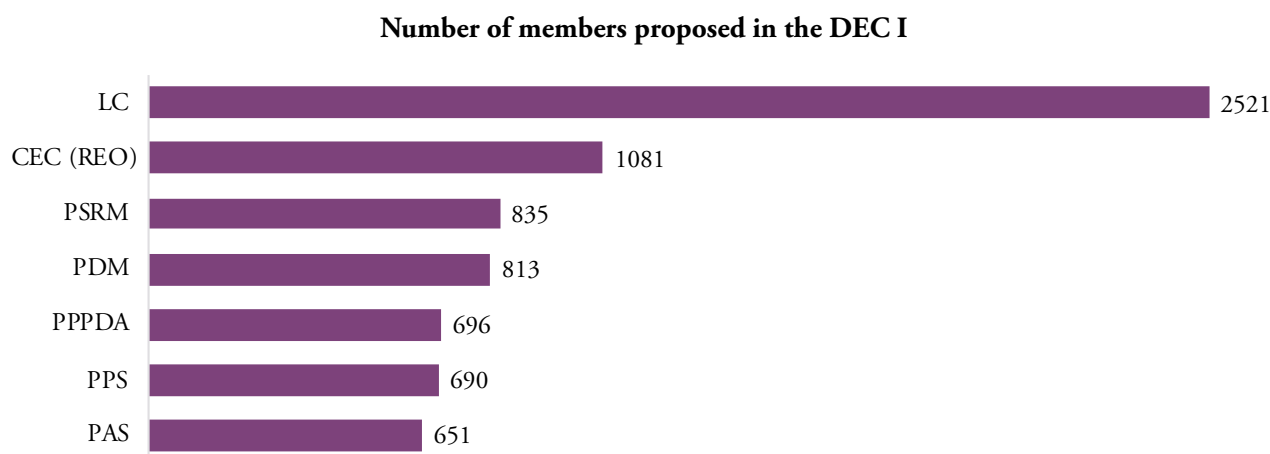
21. Report no. 2. Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, p. 20. <https://bit.ly/33osrMR>

3.2.2. Establishment of electoral constituencies and first level municipal and district electoral councils (DEC I)

In line with the Calendar Program and the legal provisions²², as well as within the period laid down therein, the CEC constituted 896 first level electoral districts and municipal and district electoral councils (DEC I). DEC I shall be made up of an odd number of members, of at least 7 and at most 11 persons²³. Half of the DEC I were made up of 7 members (50%), of 9 members – 40%, whilst of 11 members – 10%.

Following the examination of the information published on the official website of the CEC and according to the data collected by the Promo-LEX observers, we generally found the observance of the legal provisions with regard to the appointment of members by entities entitled to do so. Thus, as shown in the chart no. 1 below, most members appointed in DEC I were proposed by local councils, followed by electoral officials nominated by CEC in the REO. Of the political parties represented in Parliament, the largest number of nominated members is held by the PSRM – at least 835 members, followed by the PDM – at least 813 members.

Chart no. 1



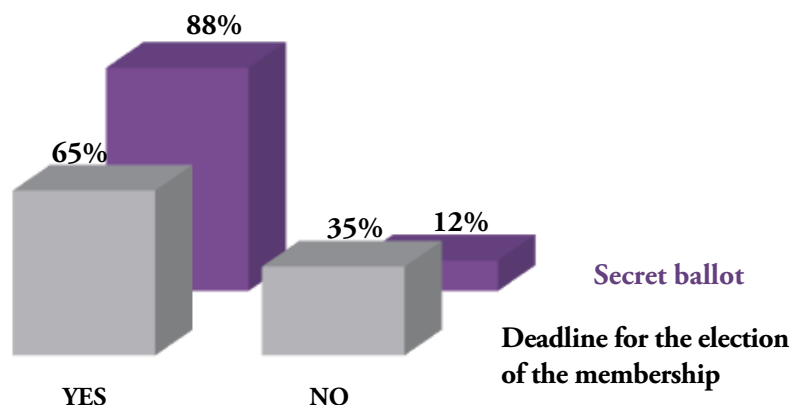
Complying with the deadline for the appointment of the membership and the procedure for secret ballot vote. According to the reports drawn up by the Promo-LEX observers, out of a number of 836 DEC I, which provided them with information, pursuant to the minutes, the deadline for the appointment of the membership²⁴ has been complied with in only 547 (65%) of the cases. As for the rest, the deadline has not been complied with starting from 1 to 12 days as of the date of establishment.

Regarding the compliance with the procedure for secret ballot vote when electing the membership, following the interview of DEC I members by the Promo-LEX observers, it was found that out of 836 DEC I, which provided them with information, the procedure for the election was observed in the proportion of 88% (734). In 102 cases, DEC I members stated that in the session for the election of the membership, participants had voted openly, by show of hands.

22. Art. 28, para. (4), art. 29, art. 131, para. (1), art. 132 of the Electoral Code
 23. Point 7, para. (3), let. b) of the Regulation on the activity of district electoral council. <https://bit.ly/2lR5pOs>
 24. According to the Calendar Program for holding the general local elections of 20 October 2019, election of the president, deputy president and secretary of DEC I through secret ballot vote shall take place within three days as of the date of establishment of the council, up to and including 12 September 2019.

Chart no. 2

Complying with both the deadline for the election of the DEC I membership and the voting procedure

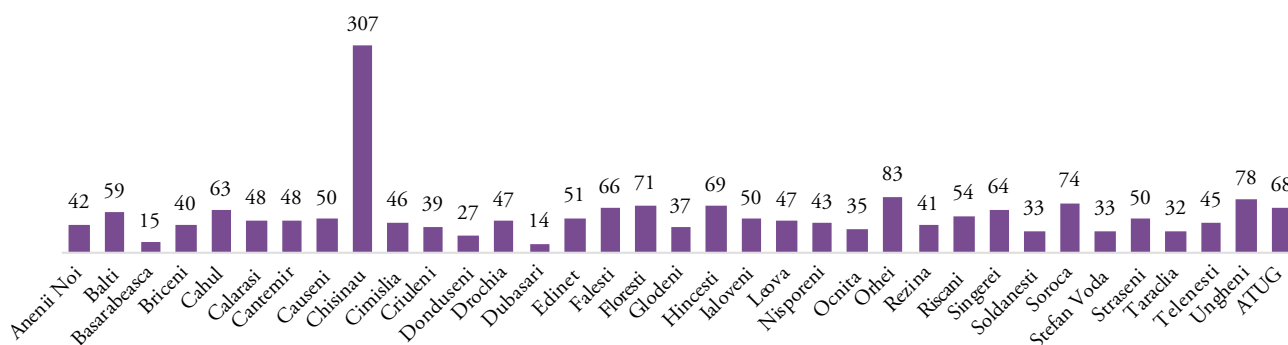


3.2.3. Establishment of polling stations (PSs)

Establishment of polling stations for the general local elections. According to the legal provisions²⁵ and the CEC Calendar Program²⁶, the deadline for setting up 1 969 PSs (14.09.2019) was respected by all electoral bodies (2 DEC II and 896 DEC I). Most PSs were constituted for Chisinau municipality (307 PSs) and Balti municipality (59 PSs) (see chart no. 3 below). Compared to the general local elections of 14 June 2015, the number of PSs set up decreased by 9.

Chart no. 3

Establishment of polling stations for the general local elections



Establishment of polling stations for the new parliamentary elections. Similar to the general local elections, the deadline for the establishment of polling stations for the new parliamentary elections was set for 14.09.2019. Only in the case of DEC I for SMC no. 48 and no. 50, the EOM has found decisions on the establishment of polling stations (within the legal time limit), while in the case of DEC I for SMC no. 17 and no. 33, contrary to the provisions of the CEC Calendar Program²⁷, no decisions on the establishment of PSs has been adopted. Although in the case of new parliamentary elections same PSs operated as in the general local elections, we believe that in order to ensure clarity in the procedure for conducting the elections, the DEC I for SMC would have had to approve separate decisions²⁸.

25. Art. 30, para. (2) of the Electoral Code: polling stations shall be established by district electoral councils in settlements, based on the proposals of mayors of cities (municipalities), districts and villages (communes), at least 35 days before the date of the elections, and shall comprise at least 30 and not more than 3000 voters. <https://bit.ly/2Jcsdy2>

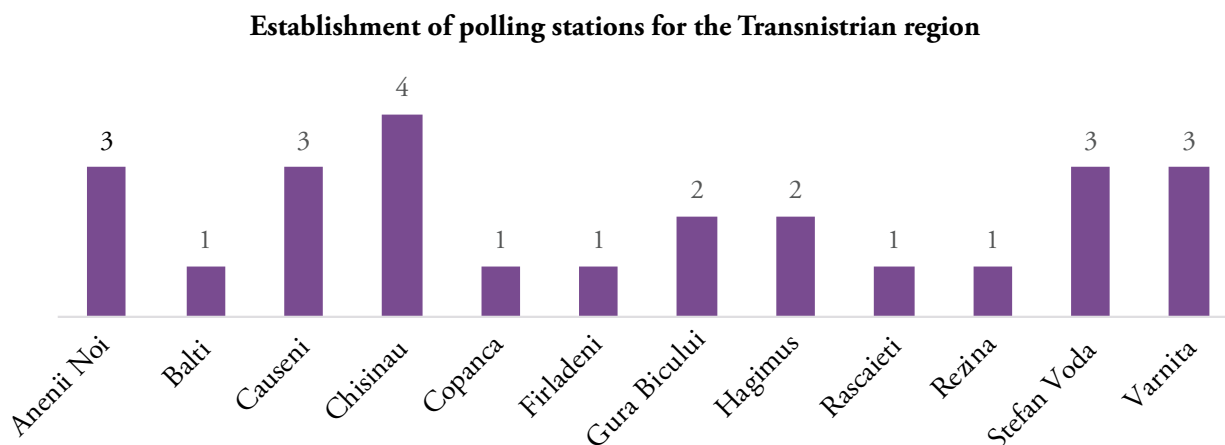
26. Point 14 of the CEC Calendar Program. <https://bit.ly/2QBCqP>

27. Calendar Program for conducting activities on holding and carrying out the new parliamentary elections of 20 October 2019. <https://bit.ly/2lglDRI>

28. For example, having analyzed the final protocols on elections in UC no. 17 and no. 33, a different approach was found in the protocols' numbering process. Thus, in the case of UC no. 17, in some PSs (e.g., 23/1 – local elections), numbers assigned to protocols were adjusted in line with the UC number. In the case of the PS no. 23/1 established for the local elections (by no means a unique case), the number of protocol for the parliamentary elections was 17/1, while the stamp affixed on the document belonged to the PS 23/1.

Referring to DEC for SMC no. 48, there have been established 25 PSs²⁹.

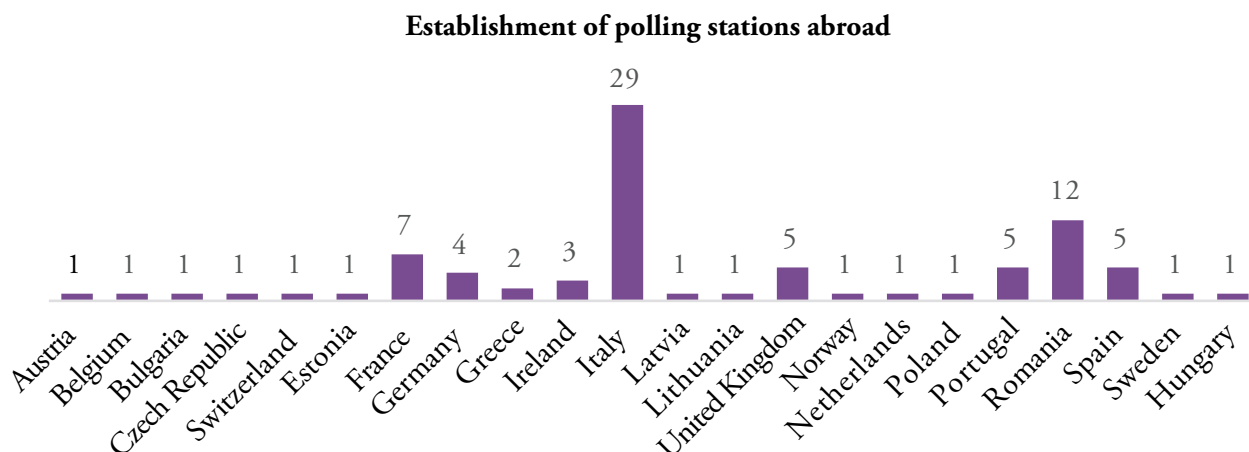
Chart no. 4



Compared to the parliamentary elections of 24 February 2019, the number of PSs remained unchanged. However, we note that the geographical location of the polling stations has been modified, excluding the regions far away from the border crossing points (Calarasi, Cahul). Nevertheless, the number of voters was relatively low – 1 207, on average 48 voters per PS (see Annex no. 3), while in the case of 5 PSs no voter has been registered. It is important to note that 19 412 voters in the DEC for SMC no. 48 have participated in the parliamentary elections of 24 February 2019.

As for DEC for SMC no. 50, according to the legal provisions³⁰, the establishment of 85 PSs abroad has been approved (see chart no. 5), with two more than in the parliamentary elections of 24 February 2019. The Promo-LEX EOM repeatedly points out on the lack of transparency in establishing the PSs abroad³¹.

Chart no. 5



Even if the number of PSs opened abroad has increased, as in the case of DEC for SMC no. 48, the voter turnout in DEC for SMC no. 50 was reduced – 9 784 voters, on average 115 voters per PS (see Annex no. 3). 64 154 voters in the DEC for SMC no. 50 have participated in the parliamentary elections of 24 February 2019.

29. <https://bit.ly/2leWFSn>

30. Art. 31 of the Electoral Code (applicable to parliamentary elections), <https://bit.ly/2TUFA9q>; Government Decision no. 445 of 13 September 2019 regarding the organization of polling stations abroad, <https://bit.ly/2mjl44D>; CEC Decision no. 2696 of 14 September 2019 regarding the organization of polling stations abroad for the new parliamentary elections of 20 October 2019, in the uninominal circumscription no. 50, west of the Republic of Moldova, <https://bit.ly/2metlLS>.

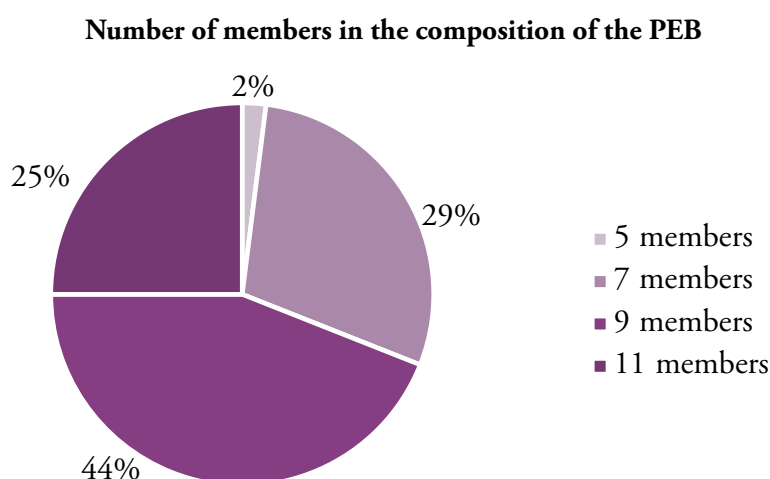
31. Report no. 3. Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, p. 17 <https://bit.ly/35nWky2>.

3.2.4. Constitution of electoral bureaus of the polling stations for the general local elections (PEBs)

According to the Calendar Program and legal provisions³², 1969 PEBs have been established for the general local elections. The deadline for setting up the aforementioned PEBs was respected in all cases. Pursuant to art. 30, para. (9) and (10) of the Electoral Code, the PEB shall consist of an odd number of members of at least 5 and not more than 11 persons. The Promo-LEX observers visited 1936 PEBs. However the number of PEBs from which information was obtained by the Promo-LEX observers, varies, for the simple reason that some of the PEBs were closed at the time of the visit, and if they were opened, the PEBs members refused to communicate with the observers.

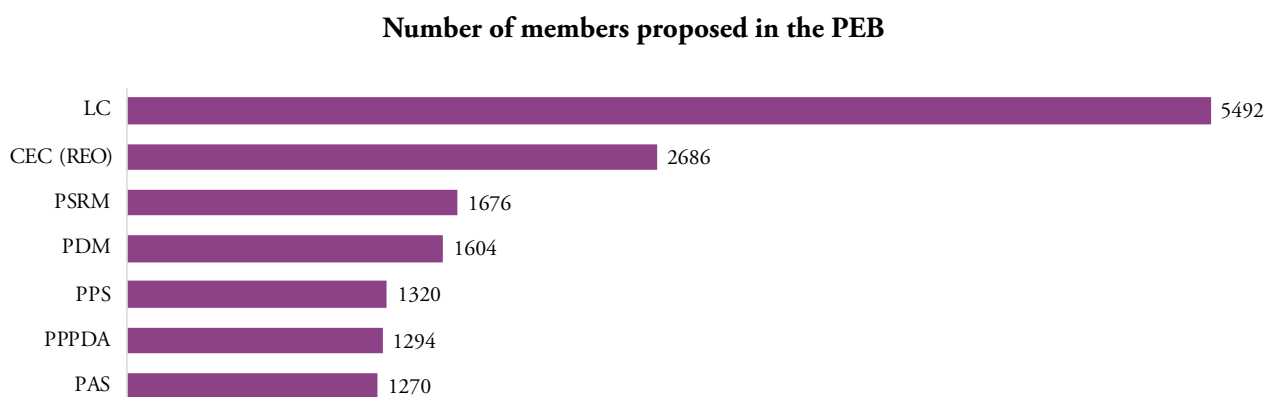
According to the reports of the Promo-LEX observers, we can see that the legal provisions have been complied with, both in respect to the number of members forming the composition of the PEB, and in respect to the appointment of members in the composition of the PEB by eligible entities entitled to do so. The chart no. 6 below shows the ratio of members represented in the composition of the PEB. Thus, most PEBs comprise a number of 9 members (44%), whilst the fewest comprise a number of 5 members each (2%).

Chart no. 6



Most members were appointed by local councils – at least 5492 members, followed by the CEC (REO) – at least 2686. Of the political parties represented in the Parliament, the most members nominated in the PEB’s composition were the PSRM – at least 1676 members, followed by the PDM – at least 1604 members.

Chart no. 7



32. The calendar program for carrying out the actions for organizing and conducting the general local elections of 20.10.2019/ The calendar program for carrying out the actions for organizing and conducting the new parliamentary elections of 20.10.2019 and art. 29, letter b), 30, para. (9), (10), 31, para. (5), 32, para. (4), 81, para. (5) and 131, para. (3) of the Electoral Code of the Republic of Moldova.

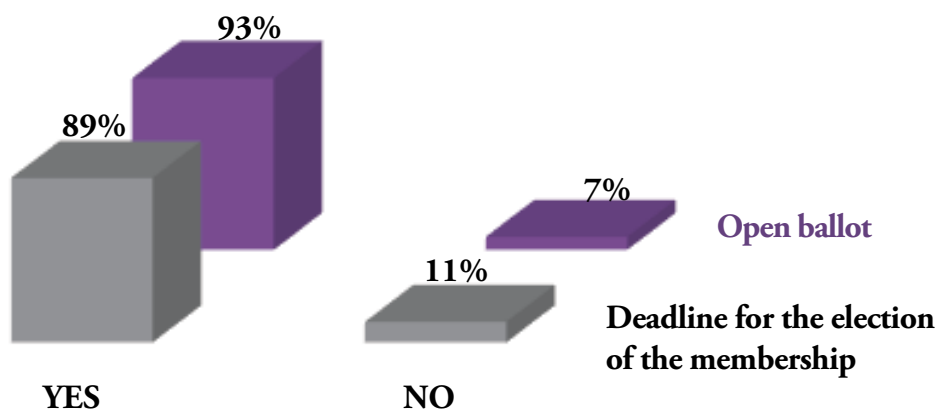
Incompatibilities of PEB’s members. According to the applicable legal provisions³³, in the case of local elections, the husband (the wife), affinities and first and second-degree relatives of the candidate for elections cannot be a PEB member. The Promo-LEX observers identified at least four cases of incompatibilities of PEB members with the position held by them³⁴ namely the existence of the degree of relatedness of certain PEB members with the electoral candidates in the respective constituencies. No changes occurred with respect to these members during the reporting period.

Involvement of PEB members in electoral agitation activities. On the basis of the findings of the Promo-LEX observers, in the case of at least three PEBs in Balti electoral constituency – namely PEBs no. 14, no. 15 and no. 18, was seen involvement of PEB members in electoral agitation activities, which is contrary to the applicable legal provisions.

Compliance with the term for electing the management of electoral councils and voting procedure. Within two days of the establishment of the PEB, the representative of the electoral council or the representative of the local public authority shall convene the PEBs’ members who shall elect, by an open ballot the president, the deputy president and the secretary of the PEB and also adopt a decision in respect thereof. According to the Calendar Program, the management bodies of the PEB were to be elected until the 26th of September. According to the reports of the Promo-LEX observers, of 1483 PEBs from which information was obtained, 160 PEBs (11%) failed to comply with the term for electing the management thereof, whilst 111 PEBs (7%) failed to comply with the open voting procedure set in this regard.

Chart no. 8

Complying with both the deadline for the election of the PEB membership and the voting procedure

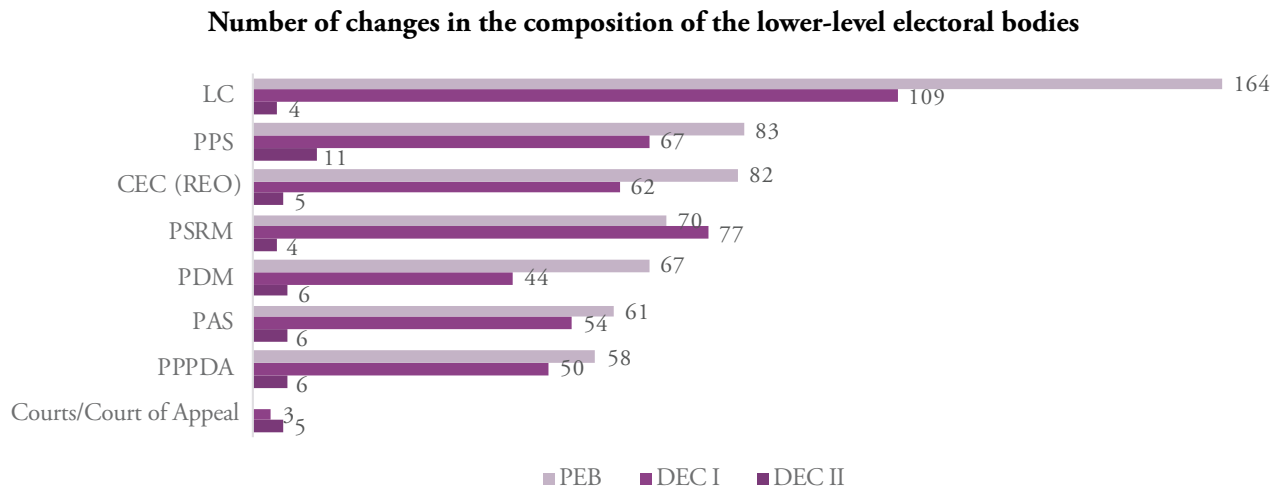


3.3. Modification of the composition of the hierarchically inferior electoral bodies

According to the reports of the Promo-LEX observers, there were at least 1098 changes in the composition of electoral bodies at the level of DEC II, DEC I and PEB. The chart no. 9 below shows that most changes at the level of DEC II were made by the PPS (11), at the level of DEC I, the most changes were made by local councils (109) and the PSRM (77), while at the level of PEBs - most changes were made by local councils (164), the PPS (83), followed by the CEC (REO) (82).

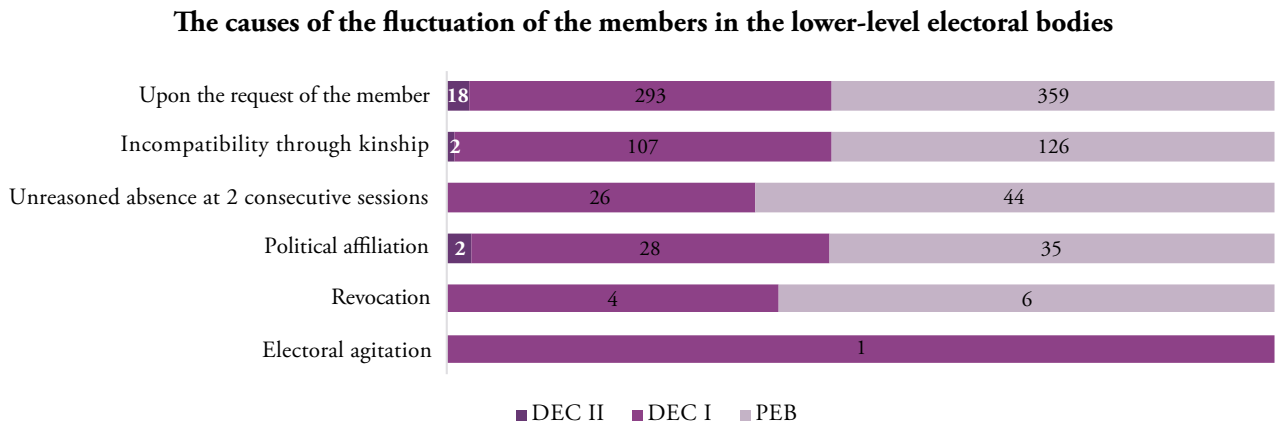
33. PSection 23 of the Regulation on the activity of electoral bureaus of the polling stations.
 34. PEB 12/26, PEB 18/9, PEB 26/18 and PEB 8/7.

Chart no. 9



The Promo-LEX EOM has found an increased fluctuation in the composition of all inferior electoral bodies. The chart no. 10 below highlights the main reasons reported by the Promo-LEX observers, for which parties terminated their membership. Thus, most requests submitted therein are based on the applications filled by members for different personal reasons, both at the level of DEC II (18 cases), DEC I (293 cases), and at the level of PEB (359 cases).

Chart no. 10

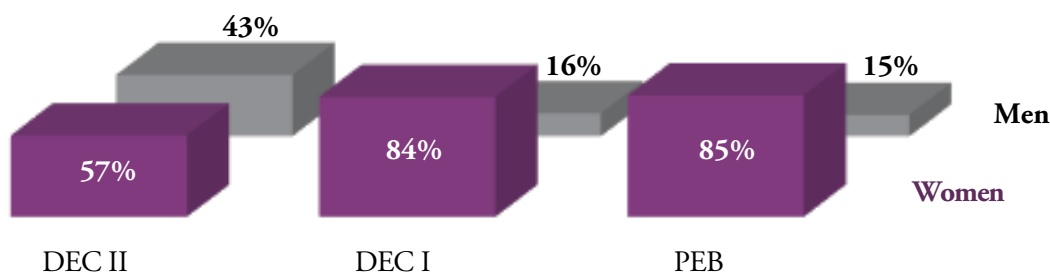


3.4. Respecting gender balance in regard to leadership positions held in the hierarchically inferior electoral bodies

Chart no. 11 reflects the involvement of men and women in the electoral processes carried out at the level of inferior electoral bodies. According to the data taken from the reports of the Promo-LEX observers, the number of women exceeds that of men. The major difference in the level of involvement was seen in the DEC I (84% women and 16% men) and the PEB (85% women and 15% men). As for the DEC II, the difference is 14% only (57% women and 43% men).

Chart no. 11

Ratio of women and men in the composition of the lower-level electoral bodies

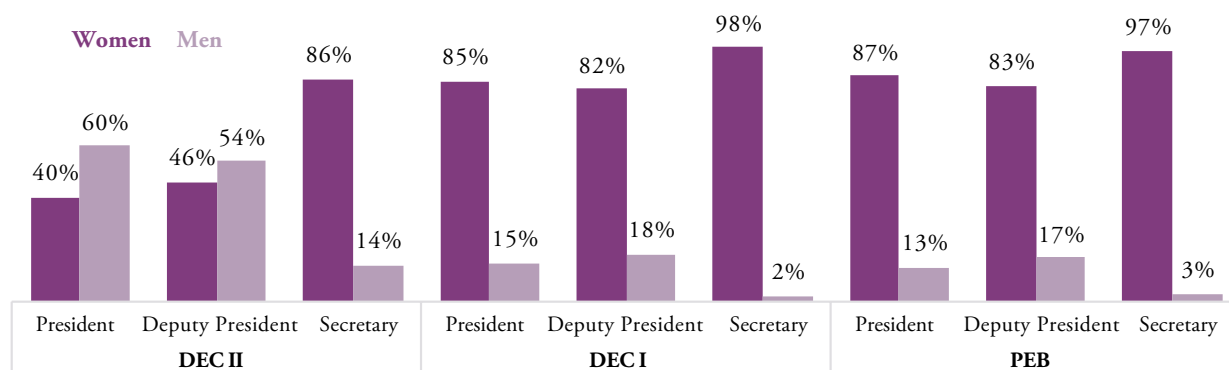


As for the gender balance at the level of managerial positions in inferior electoral bodies, we found that women are considerably exceeding the number of men. At the level of both DEC I and PEB, on average, women hold managerial and secretary jobs 89% more than men. However, at the level of DEC II, more men than women are being appointed for managerial positions, the difference being of 10%.

The position of secretary in the inferior electoral body, in all of the three aforementioned levels – DEC I and II, PEB – is held almost in absolute majority by women (between 86% and 98%). We should remember that the position of secretary has only the authority to enforce orders and to ensure they are carried out as intended and no authority in decision making.

Chart no. 12

Distribution of leadership positions based on gender in the lower-level electoral bodies



3.5. Publication of information of public interest by the representatives of hierarchically inferior electoral bodies

According to the Calendar Program, the membership, location address and working program of electoral bodies (PEB, DEC II and DEC I) shall be made public immediately after the election of their membership.

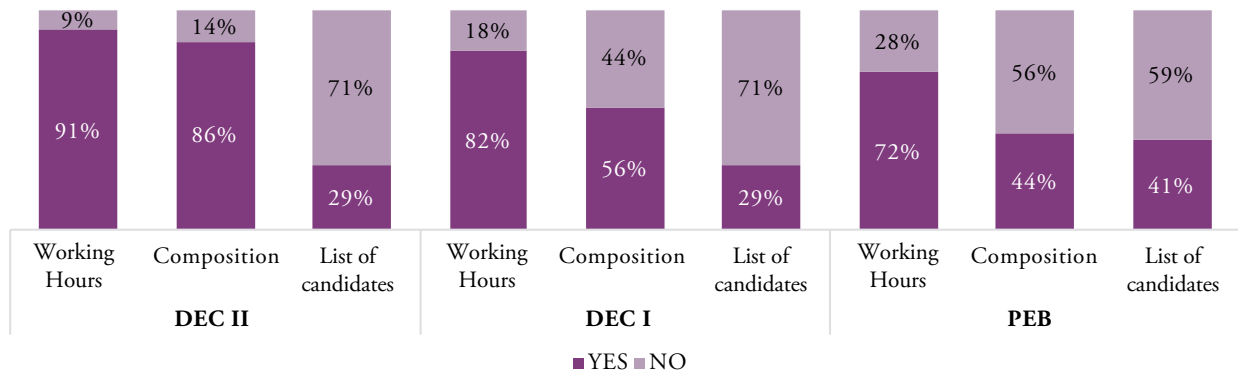
According to the applicable legal provisions³⁵, after the expiry of the period set out for the registration of the candidates, inferior electoral bodies shall fully publish the list of the candidates registered therein. The lists of candidates will be available for consultation at each polling station.

Information of public interest less published by electoral bodies refers to the list of competitors: 71% of DEC II and I, and 59% of PEBs failed to publish them. Even if to a lesser extent, it raises concerns about the omission by the electoral bodies of the publication of the working program and its composition, the most incomplete information is given when it comes to the transparency of PEBs.

35. Art. 49, para. (8) of the Electoral Code and section 49 of the Regulation on the activity of electoral bureaus of the polling stations as well as the legal provisions of the Regulation on the activity of district electoral council.

Chart no. 13

Display of the information of public interest in the headquarters of the lower-level electoral bodies



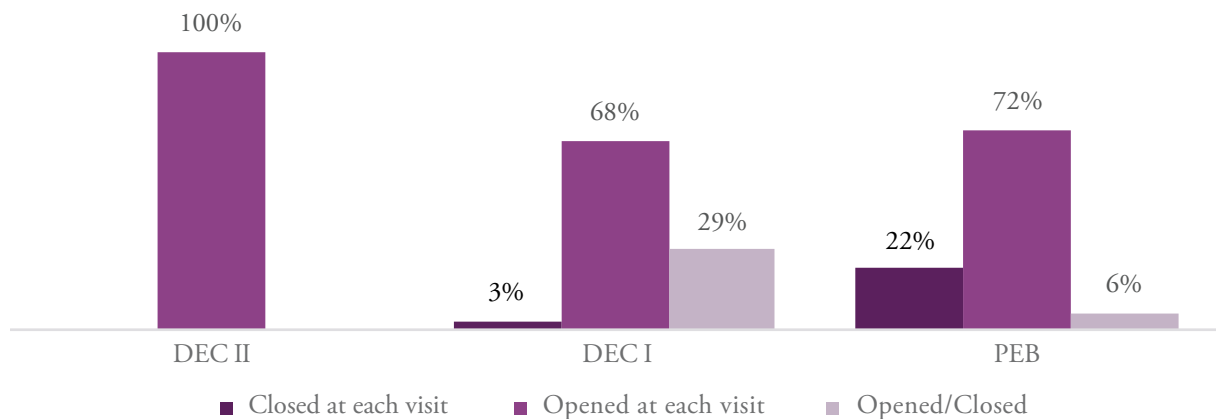
3.6. Status and accessibility of headquarters of hierarchically inferior electoral bodies during the visits of the Promo-LEX observers

Compliance with the working program. In addition to the fact that the inferior electoral bodies do not display the information of public interest in full, the latter are also closed during their working program, except for the headquarters of DEC II, which were opened during each visit made by the Promo-LEX observers.

At the level of DEC I and PEB, where three visits have been performed throughout the monitored period, on average 70% of headquarters were opened at the time of each visit, and on average 18% were both opened and closed at the time of each visit. Unfortunately, there have been cases where DEC I and PEB have been always closed at the time of the observers’ visit. These were as follows: DEC I – 3% (23 headquarters of 896), and PEBs – 22% (423 headquarters of 1936 visited).

Chart no. 14

Status of headquarters of the lower-level electoral bodies at the time of the visit

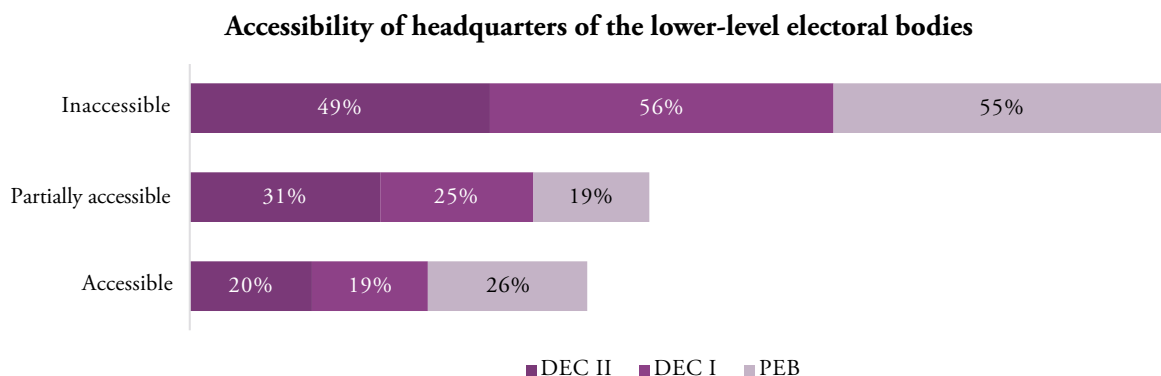


Accessibility of headquarters of the hierarchically inferior electoral bodies. When visiting the DEC II, DEC I and PEB, the Promo-LEX observers also evaluated the accessibility of their headquarters, based on three criteria: *accessible* (availability of a ramp and support bar with the dimensions provided in the regulation³⁶), *partially accessible* (only the ramp is available without the support bar) and *inaccessible* (both elements are missing). According to the reports of the Promo-LEX observers, DEC II, DEC I and PEB headquarters were accessible and partially accessible in an average proportion of 47% (see chart no. 15 below).

36. Section 17 of the CEC Regulation on the accessibility of the electoral process for persons with disabilities. <https://bit.ly/2lYJpkX>

It should be noted that neither for the elections of 20 October 2019 the premises were provided with a friendly infrastructure to a larger category of persons (persons with locomotor disabilities, older people, parents with babies in strollers or other category of persons with special needs).

Chart no. 15³⁷



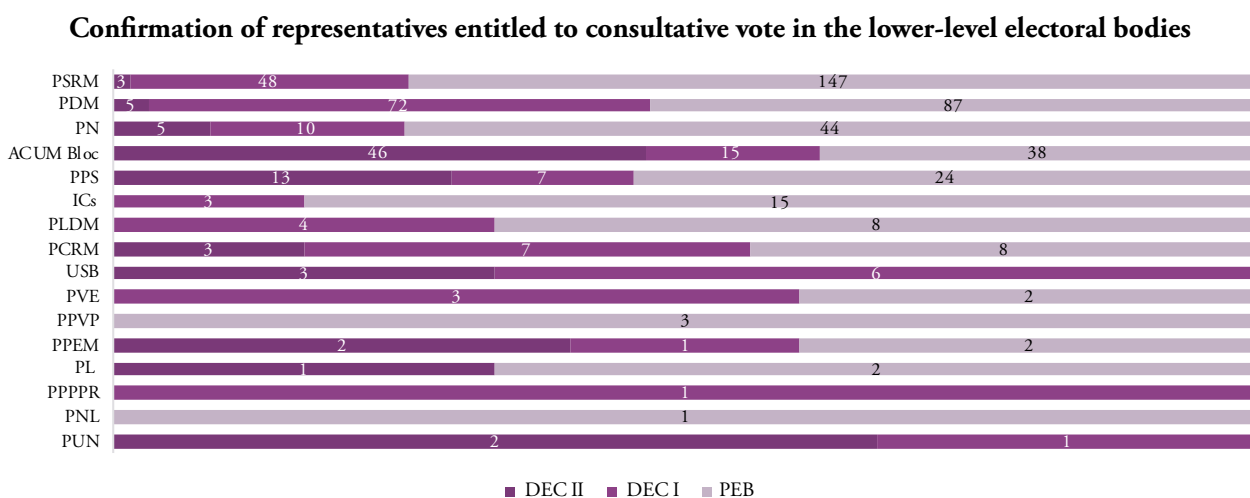
3.7. Confirmation of representatives with the right to consultative vote and registration of trusted persons in the electoral bodies

Seven persons have been confirmed as representatives with the right to consultative vote with CEC by the following electoral competitors: the PDM, the PSRM, the MSPFN, the PPVP, the PSE, the PPEM and the PN. It is worth mentioning that only the PSRM and the PDM had confirmed their representatives for both general local elections and new parliamentary elections.

According to Promo-LEX observers, at the level of DEC II, at least 83 persons nominated by the electoral competitors have been confirmed as representatives with the right to consultative vote. The most representatives confirmed therein were those nominated by the ACUM Bloc (46) and the PPS (13) (see chart no. 16 below).

At the level of DEC I, at least 178 persons nominated by the electoral competitors have been confirmed as representatives with the right to consultative vote. The most representatives confirmed therein were those nominated by the PDM (72) and the PSRM (48). Same ranking is also valid for PEBs. Of the total of 381 representatives with the right to consultative vote, the PSRM confirmed 147 persons, while the PDM – 87 persons.

Chart no. 16

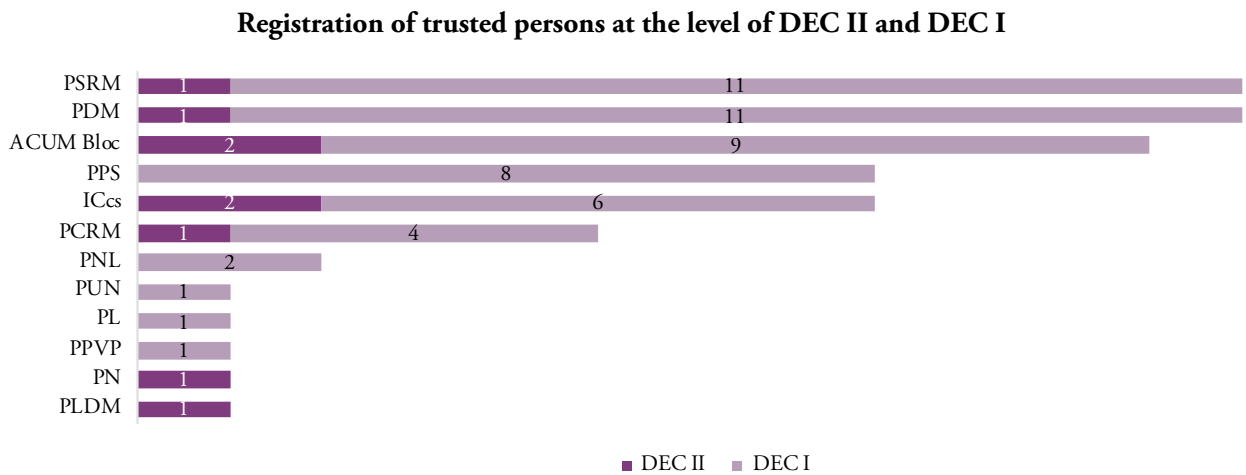


37. Information on the accessibility of each DEC II is available in the Report no. 2 of the Observation Mission for general local elections and new parliamentary elections of 20 October 2019, p. 22. <https://bit.ly/2DpFkfl>

In accordance with the provisions of the Electoral Code, electoral competitors shall independently appoint their trusted persons, submit their candidacy to the electoral council, in charge for registering them, adopting a decision in respect thereof and issuing a service card.

Based on the information obtained by the Promo-LEX observers a small number of trusted persons has been registered during the monitored period. 9 trusted persons have been registered with DEC II while 54 trusted persons have been registered with DEC I.

Chart no. 17

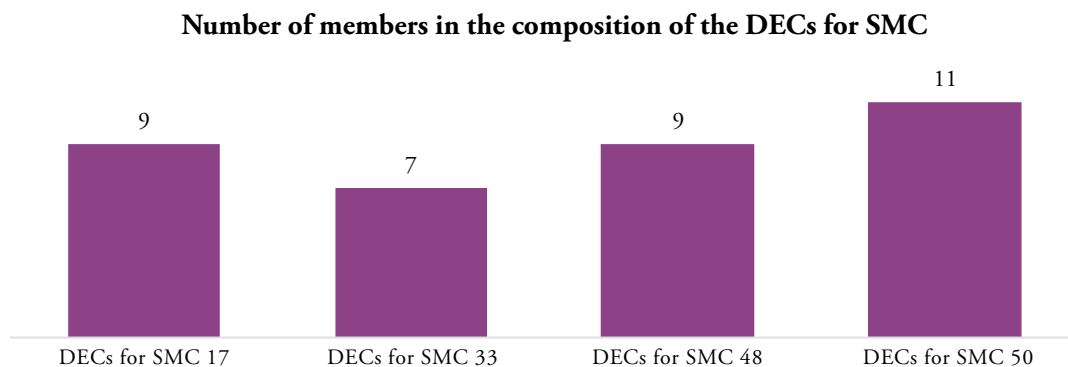


3.8. The activity of electoral councils of the uninominal electoral constituency (DECs for SMC)

3.8.1. Establishment of DECs for SMC

As stated above, on 16 August 2019³⁸, the CEC decided to set up DECs for uninominal circumscriptions no. 17 (Nisporeni), no. 33 (Chisinau), no. 48 (Transnistria) and no. 50 (west of the Republic of Moldova).

Chart no. 18

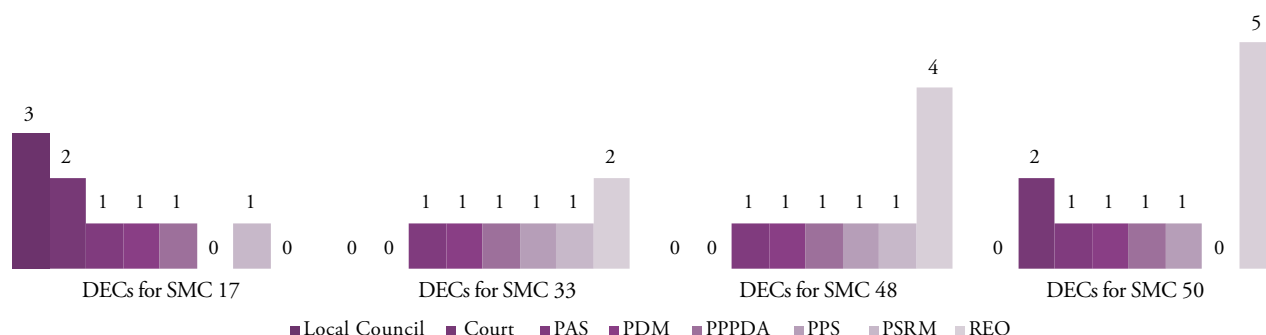


The Promo-LEX EOM found that when setting up the DECs for SMC for new parliamentary elections, all subjects in charge for designation failed to comply with the requirement to present the candidacy of members in the composition of the aforementioned electoral bodies (see chart no. 19 below). Thus no members have been nominated by the local council, judicial authority/court of appeal in case of DECs for SMC no. 33 and no. 48 and no members have been nominated by the local council in case of DECs for SMC no. 50. On the same lines, more than 2 members have been nominated in the composition of DECs for SMC no. 17.

.....
 38. Decisions of CEC no. 2569, 2670, 2571 and 2572 of 16.08.2019.

Chart no. 19

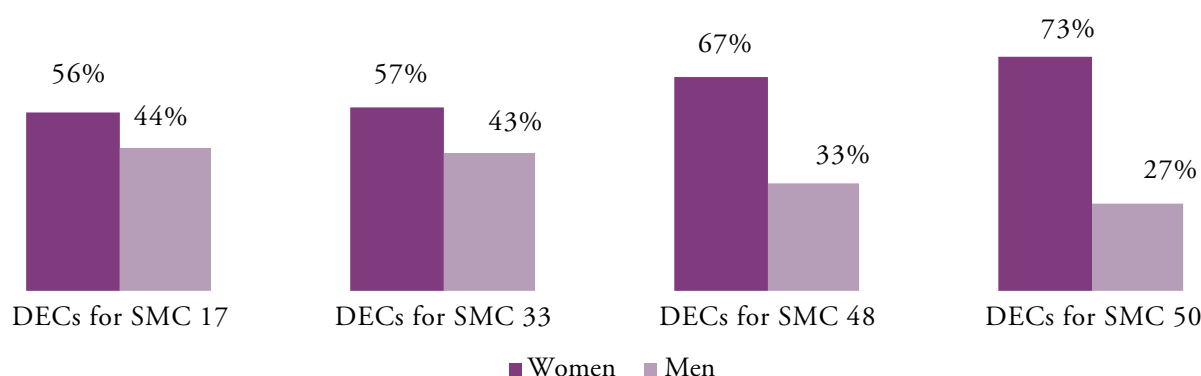
Members nomination in the composition of DEC for SMC



The overall assessment of the level of gender balance assurance when appointing DEC for SMC members indicates a high presence of women compared to the presence of men.

Chart no. 20

Complying with the gender quota within the DEC for SMC



3.8.2. Constitution of electoral bureaus of the polling stations for the new parliamentary elections (PEBs)

The Promo-LEX Mission monitored the PEBs established in the DEC for SMC no. 48 (Slobozia town, Tiraspol municipality and Bender). According to the decisions taken by the DEC for SMC no. 48, all 25 PEBs have been established within the time limit set forth therein.

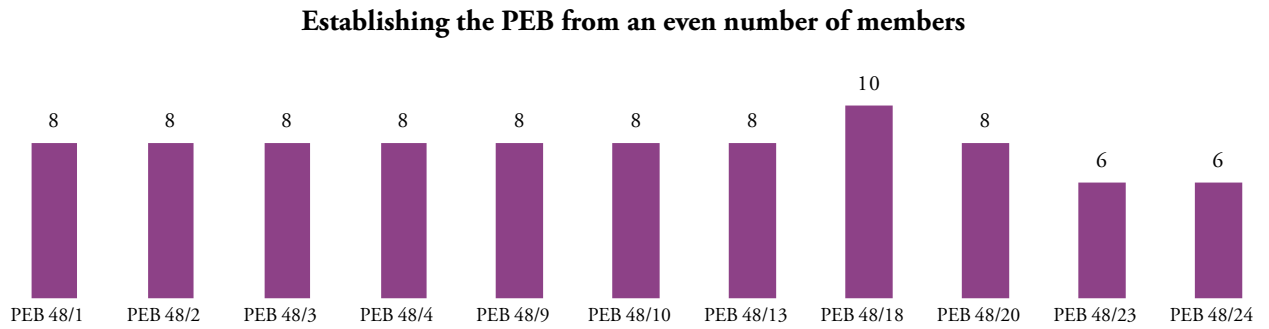
As for the PEB in the UC no. 17 and UC no. 33 the Promo-LEX Mission finds that for the latter, no decisions on the establishment of such were published therein. In order to ensure clarity in the conduct of the new parliamentary elections of 20 October 2019, in these SMCs, the DEC for SMC should have had to approve decisions on the establishment of both the PS, and the PEB.

In the case of UC no. 50, we find that the addresses of the polling stations were published on the 10th of October 2019, however, according to the Calendar Program, the information on membership, headquarters and means of contacting the polling stations shall be made public until the 26th of September 2019 inclusive.

In addition, we note that on the date the report was prepared, no circulars, which would regulate certain problem situations, which might arise when conducting different ballots such as general local elections and new parliamentary elections in the same polling station with the participation of the same membership of PEB, were published on the CEC's website.

PEB Membership. 11 cases when the PEBs comprising an even number of members have been identified in the decisions of the DEC for SMC no. 48 on the establishment of the PEB issued on the 24 September 2019.

Chart no. 21



Subsequently, according to the data available, the membership of only five PEBs - namely no. 2, 9, 10, 13, 20 - has been changed in compliance with the applicable legal provisions.

IV. ELECTORAL COMPLAINTS

4.1. Examination of complaints filed in the context of the general local elections

4.1.1. Complaints lodged with the CEC

53 complaints were lodged with the CEC during the reference period, of which: 34 – by candidates nominated by political parties, 10 – by independent candidates, 5 – by voters, 4 – by other subjects (see chart no. 22). Most complaints lodged were against actions/inactions and decisions of electoral bodies (38) as well as against political parties and candidates nominated by them (16) (see chart no. 23).

Chart no. 22

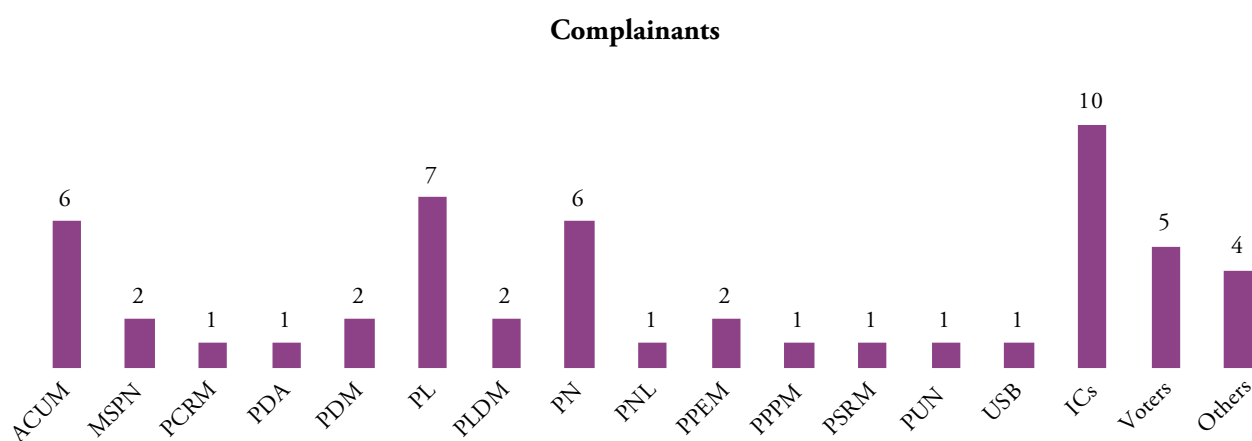
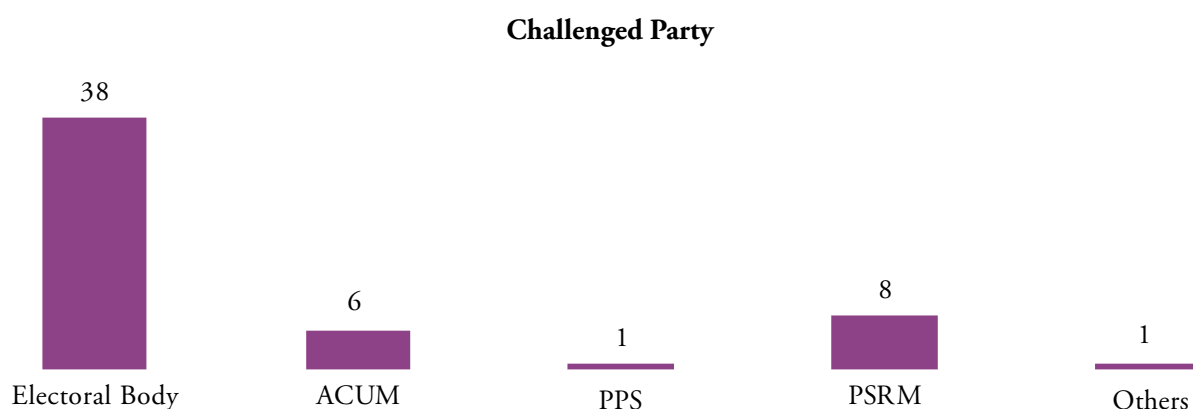
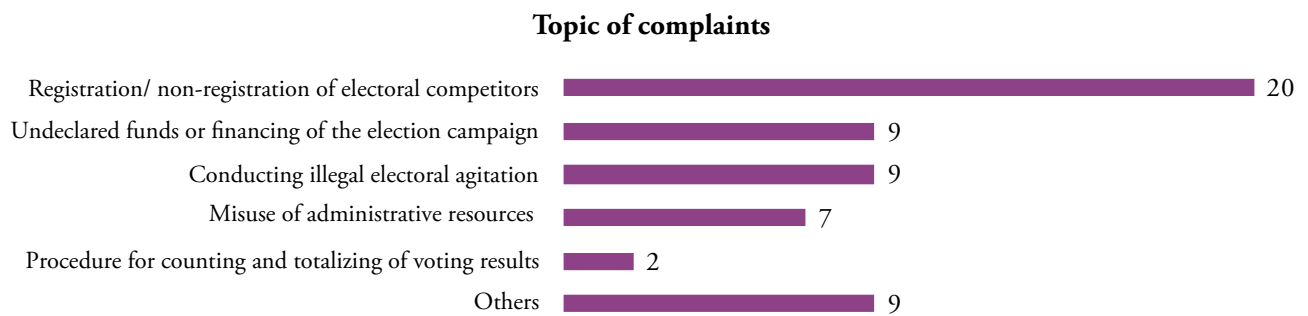


Chart no. 23



Complaints lodged with the CEC mainly covered the registration/non-registration of electoral competitors, failure to declare the expenditures incurred or financing of the electoral campaign as well as conducting electoral agitation in violation of the legal provisions.

Chart no. 24



The CEC approved decisions to reject the complaints lodged in 9 cases, submitted the complaints in accordance with its respective competences in 13 cases, admitted a single complaint, while for the rest 22 cases it returned the complaints lodged therein. Other solutions have been adopted in relation to other seven complaints³⁹. A complaint remained unsolved until 3.12.2019, being examined by the CEC for three times, but still, not having obtained the required number of votes.

We note that during the electoral period, starting with 3rd of October 2019, both complaints lodged with the Commission, and solutions on them have not been published on the CEC’s website (except for the decisions). As a result the transparency of the electoral process decreased due to such omission. The publication of the complaints thereof was resumed only on the day of the second round of elections.

In respect of the observance of **the deadlines for resolving the complaints**, it should be noted that three complaints have been solved or an answer has been provided on the same day, 18 complaints have been solved within one day, ten complaints – within two days, seven complaints – within three days, six complaints – within four days, one complaint – within five days. Five complaints on financing of the electoral campaign have been solved within 7-19 days.

In this regard, the Promo-LEX EOM reiterated that, pursuant to art. 71, para. (6) of the Electoral Code, the procedure for examination of complaints on financing of the electoral parties shall not be subject to limitation periods laid down in arts. 72–74. Thus, the CEC shall resolve the complaints at least in the period before the elections day, if the circumstances that had to be elucidated did not require a very thorough examination.

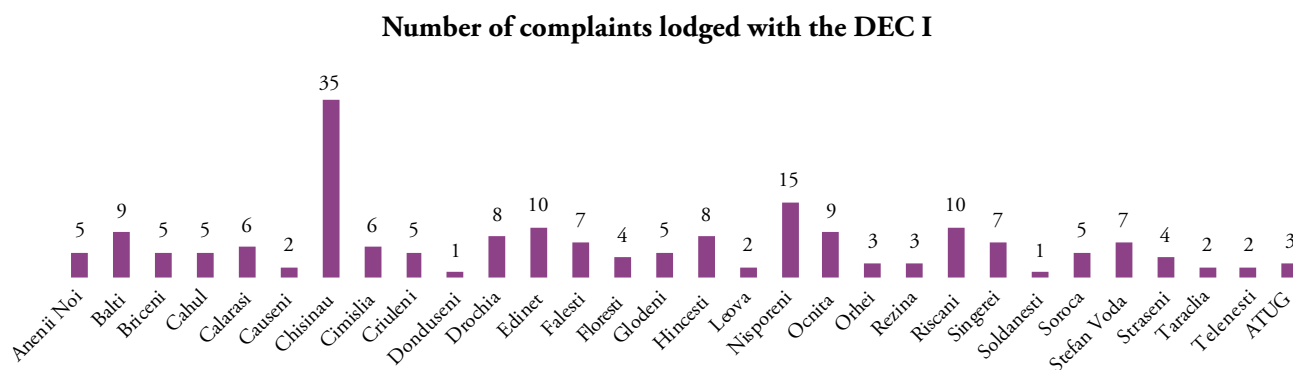
It is important to emphasize that, contrary to art. 72, para. (5) of the Electoral Code, in the event of a complaint, the two-day deadline for submitting the complaint for examination in line with the powers vested in it was exceeded. Also, contrary to art. 73, para. (2) of the Electoral Code, in the event of five complaints lodged against actions and decisions of electoral bodies, the deadline for resolving them was exceeded by one day, while in the event of two complaints, the deadline thereof was exceeded by ten days.

4.1.2. Complaints lodged with DEC II

According to Promo-LEX observers, **194 complaints** were lodged with DEC II, most of them being lodged with DEC Chisinau – 35, Nisporeni – 15, Edinet and Falesti –10 each.

³⁹. One complaint remained unresolved; as for two complaints – the subject matter thereof deemed to have been exhausted by the inferior electoral bodies, as for other two complaints – the answer to them has been provided by letter.

Chart no. 25



In regards to **subjects lodging complaints**, it was stated that 148 complaints were lodged by candidates nominated by political parties, 27 – by independent candidates, 14 – by voters, all others being lodged by other subjects in the electoral process (see chart no. 26).

Most complaints lodged were against actions/inactions and decisions of electoral bodies (117) as well as against political parties and candidates nominated by them (59). 14 complaints were lodged against actions/inactions of independent candidates (see chart no. 27).

Chart no. 26

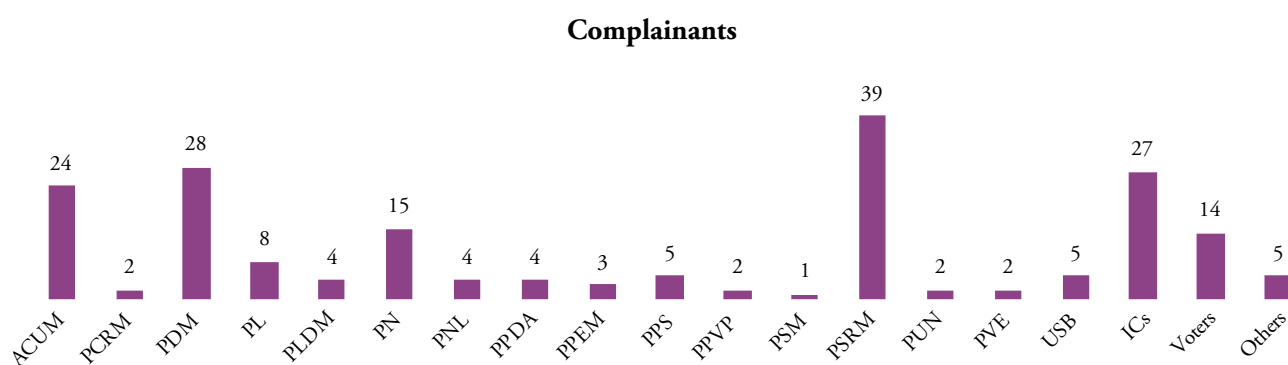
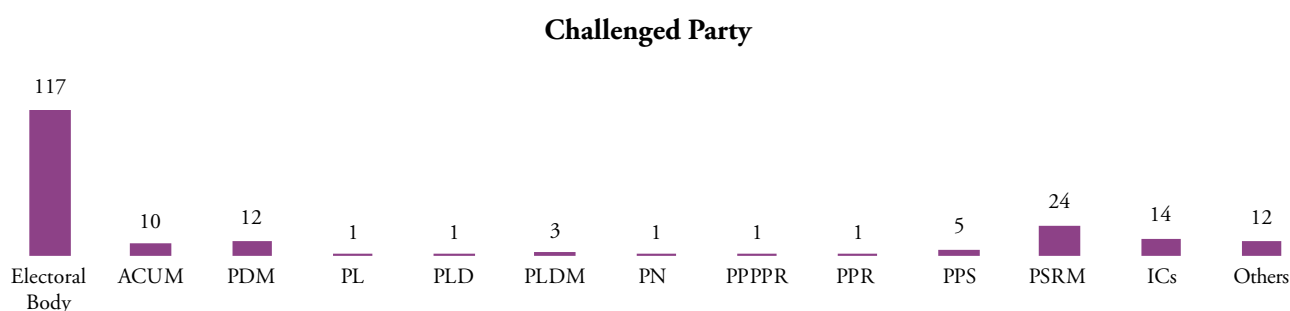
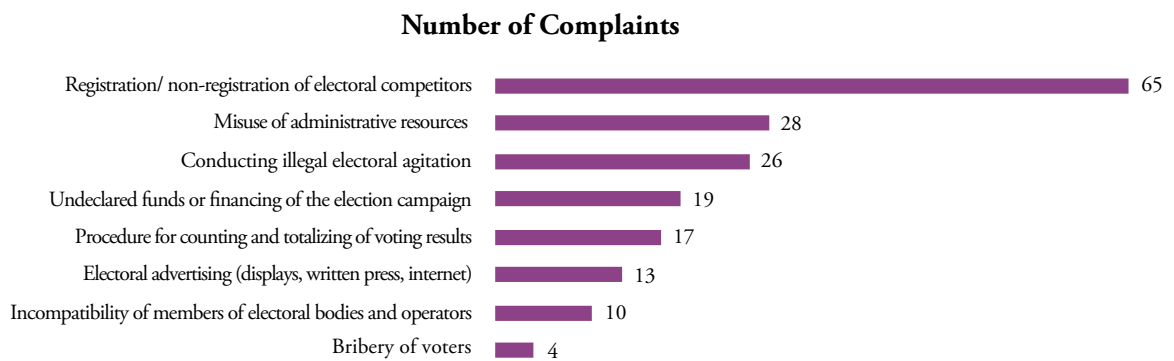


Chart no. 27



Complaints lodged with the DEC II mainly covered the registration/non-registration of electoral competitors, use of administrative resources as well as conducting electoral agitation in violation of the legal provisions.

Chart no. 28



As for the **solutions adopted therein**, the DEC II approved decisions to reject the complaints lodged in at least 72 cases, submitted the complaints in accordance with its respective competences in at least 32 cases, admitted the complaints in at least 23 cases and returned the complaints lodged therein in at least 21 cases.

It is important to note that the access of Promo-LEX observers to complaints, decisions on them and Registry of Complaints was restricted within the DEC II Soroca and Nisporeni. In addition, although the CEC initially published the decisions issued by DEC II on the website of the Commission, as from October, the latter were no longer published, fact, which affected the transparency of the electoral process.

In respect of the observance of **the deadlines for resolving the complaints**, it should be noted that at least 20 complaints have been solved or an answer has been provided on the same day, of which only eight complaints have been solved within one day, at least 29 complaints – within one day, at least 42 complaints – within two days, 38 complaints – within three days, 15 complaints – within four days, eight - within five days, one - within six days.

It is important to emphasize that, contrary to art. 72, para. (5) of the Electoral Code, in the event of three complaints, the two-day deadline for submitting the complaint for examination in line with the powers vested in it was exceeded. Also, contrary to art. 73, para. (2) of the Electoral Code, in the event of seven complaints lodged against actions and decisions of electoral bodies, the deadline for resolving them was exceeded by one day, while in the event of one complaint, the deadline thereof was exceeded by two days.

4.1.3. Complaints lodged with DEC I

According to the observers of the Promo-LEX EOM, **36 complaints** were lodged with DEC I, most of them being lodged with DEC I of Chisinau municipality (6), districts of Nisporeni (4) and Glodeni (4).

In regards to **subjects lodging complaints**, it was stated that 26 complaints were lodged by candidates nominated by political parties, four – by independent candidates, five – by voters, one complaint being lodged by a member of IG (see chart no. 29).

Most complaints lodged were against actions/inactions and decisions of electoral bodies and members thereof (10) as well as against political parties and candidates nominated by them (19). Six complaints were lodged against actions/inactions of independent candidates. One complaint has been lodged against the actions of one LPA (see chart no. 30).

Chart no. 29

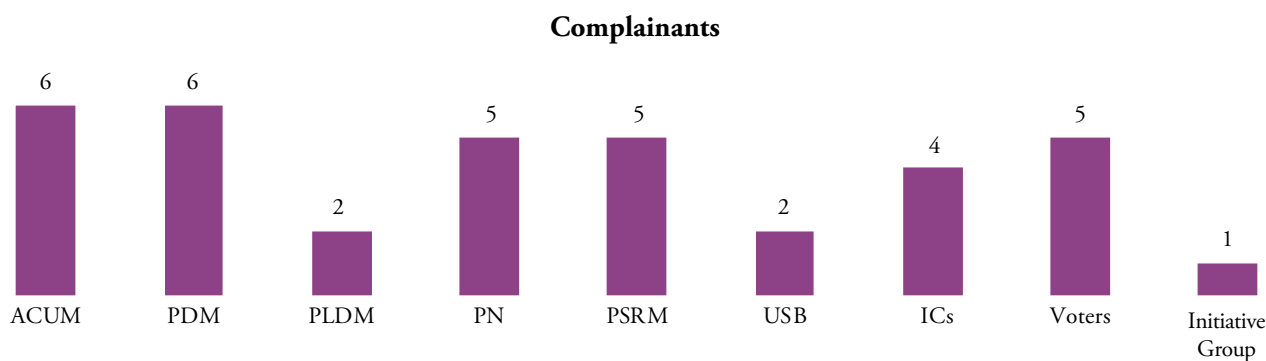
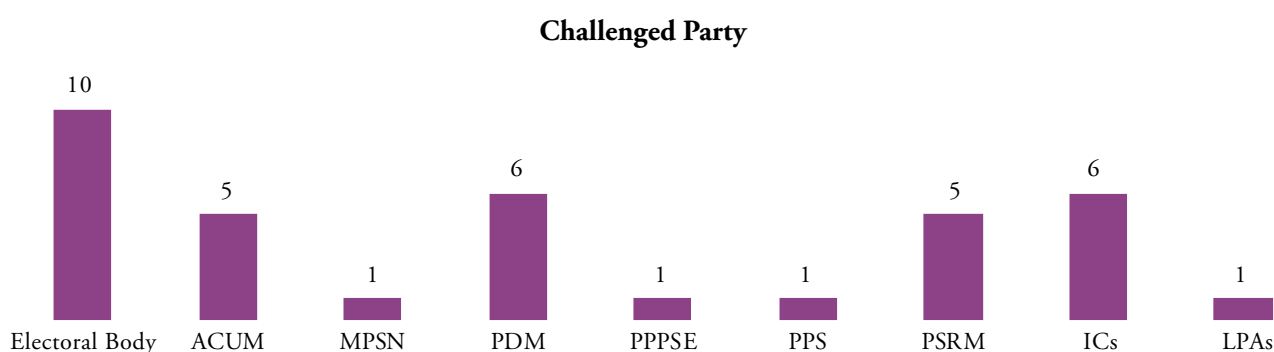


Chart no. 30



Complaints lodged with the DEC I mainly covered the registration/non-registration of electoral competitors (10), use of administrative resources and non-suspension of electoral competitors from office (10) as well as conducting electoral agitation in violation of the legal provisions (6).

As for the **solutions adopted therein**, the DEC I approved decisions to reject the complaints lodged in at least 10 cases, admitted the complaints in at least nine cases, submitted the complaints in accordance with its respective competences in at least seven cases and returned the complaints lodged therein in at least three cases.

In respect of the observance of **the deadlines for resolving the complaints**, it should be noted that at least five complaints have been solved or an answer has been provided on the same day, at least six complaints have been solved within one day, at least seven complaints – within two days, two complaints – within three days, one complaint – within four days. It is important to emphasize that, contrary to art. 72, para. (5) of the Electoral Code, in the event of three complaints, the two-day deadline for submitting the complaint for examination in line with the powers vested in it was exceeded.

The Promo-LEX EOM found that at least three DEC I⁴⁰, operating simultaneously as an electoral bureau, pursuant to art. 132 of the Electoral Code, resolved four complaints lodged with DEC, as PEB, although the electoral bureau was not competent to solve complaints on the registration or non-registration of the electoral competitor. We note that the powers to solve the complaints lodged with DEC and PEB must be clearly delimited, especially since the DEC is entitled to operate as a PEB at the same time.

Also, the Promo-LEX EOM draws attention to cases involving groundless refusal to accept the complaints for examination. Further to termination of the first round of elections, DEC 14/1 Drochia, on 22.10.2019, refused to accept three of the following complaints: one submitted by the representatives of the PSRM concerning the results of the elections, and others two submitted by independent candidates, proposing to the contesting parties to lodge them with the court. The reason for refusing to accept the complaints was the lack of activity

40. DEC 19/3 Cajba, DEC 19/6 Cobani, DEC 34/19 Negureni.

and functionality of the DEC 14/1 Drochia. We are of the opinion that DEC shall accept the complaints and submit them, as the case may be, with the court, which shall examine them and confirm the lawfulness of electoral results at the same time. Promo-LEX reiterates the need to regulate the deadline thereof, the way of filing and solving the complaints and the material competence of the electoral bodies or the courts after the election day and between the polls for different types of elections.

4.1.4. Qualitative analysis of the content of the complaints and solutions for them in the general local elections

a) Legal Status of the Complainants

Following the qualitative analysis of the complaints, the Promo-LEX EOM found that in at least three cases⁴¹ the complaints have been lodged by the presidents of the TO belonging to political parties. We note that, according to section 3 of the Regulation on the procedure for complaints management and handling by the electoral bodies during the electoral period⁴², the voter, electoral competitor or electoral body may appear as party to a complaint the action/inaction or judgment is being contested. Respectively, in the absence of the candidate for the position of mayor or councilor or of the capacity of representative with the right to consultative vote, the representatives of the TO belonging to political parties are not entitled to submit any appeals.

The Promo-LEX EOM believes that the position held within the political party (especially when referring to the composition of an electoral bloc) do not empower – presidents or secretaries of the TO – to submit appeals on their behalf with the electoral bodies, for the simple reason that such power lies with the electoral competitors and voters only, in light of art. 1 of the Electoral Code.

b) The incompatibility and involvement of PEB and DEC members in activities of electoral agitation

At least seven complaints have been lodged on the involvement of the members of electoral bodies (DEC, PEB) in both activities of electoral agitation and collecting signatures in support of independent candidates. Although some of the complaints were accompanied by evidence, DEC II rejected six complaints, whilst one has been submitted for examination in line with the powers vested in it.

Art. 35, para. (7) of the Electoral Code stipulates that members of both electoral councils and bureaus shall not be allowed to conduct activities of electoral agitation in favour of or to the detriment of persons standing as candidates for an eligible public office; shall not be allowed to engage themselves in political activities aiming to support one of the electoral competitors; shall not be allowed to be affiliated to any of them; shall not be allowed to provide financial support or any other support, directly or indirectly, to any electoral competitor. In the case of local elections, the husband (the wife), affinities and first and second-degree relatives of the candidate for elections cannot be a member of both electoral councils and bureaus.

Also, at least 10 complaints have been lodged therein invoking the incompatibility of both PEB/DEC members and operators due to their degree of relatedness with candidates and/or holding a publicly appointed office as well as an office within the administration of the electoral body at the same time. After analysis, it was found that the following cases are not prohibited by the legislation in force and cannot be classified as breaches of electoral legislation:

- 1) collecting signatures in favour of an independent candidate, and after the establishment of the PEB - holding the membership of the PEB;
- 2) holding the membership of the electoral body by the goddaughter or godson of the candidate;
- 3) holding the position of operator within PEB by the first or second-degree relative of an electoral competitor;
- 4) publication and distribution in support of the electoral competitor on the social networks of electoral agitation materials collected from the page of the member of the electoral body. In two such cases DEC II decided

41. P. Arama (secretary TO PPPDA, Cimislia), I. Chetaru (president TO PCRM Cimislia) vs PPDA; I. Dvorjanscaia (president TO PPS, Glodeni) vs DEC Iabloana; TO PSRM, Stefan Voda vs DEC Brezoaia.

42. <https://bit.ly/33teyg9>

that in order to establish with certainty the actions of electoral agitation by the member of the electoral body, special knowledge in the field of information technologies is required, thus rejecting the complaints submitted therein. We consider it necessary to develop certain rules for unifying the practice of examining the evidence submitted from social networks or web page;

- 5) holding the position of acting mayor and operator within PEB at the same time. According to the response provided by CEC to a question asked by DEC no. 32, it was concluded that the provisions of art. 33, para. (5)⁴³ of the Electoral Code and section 22 of the Regulation on the activity of the PEB allow for concomitant holding of the positions of SAISE operator and public official.

c) Registration/non-registration of electoral candidates

Firstly, let us remember that for the first time in the local elections, **the registration of the lists submitted by collective applicants was made conditional upon the compliance with the minimum ratio of gender representation.**

At least 12 complaints have been lodged for non-compliance with the minimum ratio of gender representation of 40% for both sexes, laid down in art. 46, para. (3) of the Electoral Code as well as for cancellation of the registration of the electoral candidate. It is important to note that the application of this legal provision and transitional one referred to in art. VII⁴⁴ of the Law no. 113/2019 caused confusion for both electoral competitors and members of electoral bodies. Most of the complaints have been rejected as unfounded or returned to applicants, and only two complaints have been partially admitted. It is important to stress that no specific procedure on the observance/non-observance of the minimum ratio of representation was adopted in respect of the lists of candidates and further actions of the electoral body in the event of amendment of the list of candidates. Thus, the following situations were found:

- 1) the electoral candidate was registered, although the list did not correspond to the minimum ratio of 40%, and at the time of challenging the procedure for his/her registration, the limitation period of three days had already exceeded. Hence, the complaints have been dismissed as being out of time;
- 2) the electoral candidate was registered, although the list did not correspond to the minimum ratio of 40%. Following the submission of the complaint, but before a judgment would be rendered in this respect, the electoral candidate submitted an application for changing the list of candidates. Thus, the electoral body decided to reject the complaint thereof, due to the fact that the judgment for changing the list of candidates has been adopted before the issuance of the judgment on the complaint.

In the light of the foregoing, we advocate the need to develop certain special procedures in order to guarantee that the provisions on representation in the list of candidates are observed, while submission of complaints on non-compliance with the gender quota should not be conditioned by the limitation period of three days from the issuance of a judgment in this respect, however, the preservation of the state of illegality leads to the vitiation of the electoral process.

Secondly, at least 16 complaints have been lodged for the annulment of decisions rejecting the registration of independent candidates due **to invalidation of signatures of the supporters in the subscription lists submitted therein.** Of the complaints lodged, nine of them have been rejected in full, two have been admitted, while the decisions for non-registration of independent candidates have been cancelled. Particular cases of resonance have been described in intermediate reports⁴⁵; for the moment, we would like to draw the reader's attention to other matters.

It is important to note that granting to the DEC II of the power to examine the lists of subscription submitted by independent candidates in level I constituencies, and subsequently the power to examine the complaints submitted by the aforementioned candidates, give rise to suspicions. Pursuant to art. 48, para. (1) of the Electoral

43. Public officials, members of electoral bodies and members of divisions belonging to such bodies, absolved of their permanent job duties for the electoral period, shall preserve their status of public official.

44. Prin derogare de la prevederile propoziției a doua din art. 46, alin. (3) din Codul electoral, la alegerile locale generale din 20 octombrie 2019, listele de candidați vor fi întocmite respectându-se cota minimă de reprezentare de 40% pentru ambele sexe, minimum trei candidați la fiecare zece locuri.

45. Report no. 4. Promo-LEX Election Observation Mission of the general local elections and new parliamentary elections of 20 October 2019, pages 41-42. <http://bit.ly/2pYTXT4>

Code, after having received the subscription lists, **the relevant electoral body shall proceed with the verification of the authenticity of signatures on the list, the right to vote of the person registered on the list, domicile of the latter.** On 20 August 2019, the CEC approved a specific procedure under the Regulation on the peculiarities of designation and registration of candidates in local elections, different from the provisions of the Electoral Code. According to section 36 of the Regulation thereof, the coordinator of the working group will ensure the introduction, verification and processing of subscription lists into the application “Subscription lists” through the operator of the DEC II. The report generated after the processing of all the subscription lists from the file will be presented by the coordinator of the working group to the members of the district electoral council and will be annexed to the informative note on the results of the verification of subscription lists.

The Promo-LEX EOM recalls that granting to the operator in the apparatus of the higher hierarchical electoral body (DEC II) of the power to check the subscription lists submitted by the independent candidate with the DEC I, as well as with the “Subscription lists” application, raises reasonable doubts about the objectivity of examination of the complaints referring to the registration or non-registration of the electoral candidate, which, pursuant to the legal provisions, shall also be submitted to the electoral body hierarchically superior to the one deciding to register or reject the registration. Also, interference with the activity performed by DEC I on the part of DEC II occurs therein by granting such powers, including technical ones, however, main power to check the subscription lists lies with the DEC I in this case. We note that the refusal to register the electoral candidates is most often substantiated through the results provided in the report developed as a result of processing the subscription lists into the “Subscription lists” application.

Moreover, at least in the event of a complaint⁴⁶, the subscription lists were submitted by an acceptance and delivery certificate from DEC I to the DEC II operator to perform the check thereof, within two days. Therefore, it appears that the coordinator of the working group within DEC failed to comply with the procedure for ensuring the introduction, verification and processing of subscription lists into the “Subscription lists” application, both check and processing thereof being performed by the operator.

In the same context, in the event of another complaint, the DEC no. 14 Drochia, by the Decision no. 1 of 28 September 2019⁴⁷, found that the DEC no. 14/19 of Pelinia village, receiving from DEC Drochia no. 14 the information note on the check of subscription lists, under which it was stated that 97 signatures of the total of 355 presented therein are null and void (under the minimum level), *“ignored the findings in the information note provided by DEC Drochia no. 14 and without any authorization proceeded with the check of signatures in the subscription lists, a task, which does not fall within the competence of DEC I”*. We note that the person whose subscription lists were to be checked was running for mayor in a level-one constituency.

We consider the continuation of practices on the check of subscription lists submitted by independent candidates with DEC I by DEC II as inadmissible.

d) Failure to suspend candidates from office, according to art. 13, para. (3) of the Electoral Code

At least five complaints lodged with DEC II and at least two complaints lodged with DEC covered non-suspension from office of candidates registered therein or exercise of their duties, although the declaration for their suspension from office has been submitted, throughout the period of the electoral campaign, calling for the cancellation of the registration of the candidate under art. 75, para. (5) of the Electoral Code. Four complaints have been rejected in full, whilst one has been returned to the applicant.

The Promo-LEX EOM regards the Decisions issued by DEC I Cobani 19/6 and DEC II no. 19, covering the non-suspension from office seven days of the registration of the candidate and application of the penalty of a written warning as unfounded. The aforementioned electoral bodies have substantiated the application of the written warning instead of the cancellation of registration of the electoral candidate, under art. 75, para. (5)

46. A. Cotruta (IC) vs DEC 1/16 Stauceni.

47. <https://bit.ly/2sl62TG>

of the Electoral Code stating that the actions carried out by the electoral candidate⁴⁸ are lacking in a political tint and have no influence on the electoral campaign. It is worth mentioning that the Electoral Code does not provide for the possibility of applying another penalty other than the cancellation of the registration for the failure to suspend the candidate from the office.

In like manner, in the event of other two complaints, further exercise of duties by electoral candidates who have submitted declarations for their suspension from office throughout the period of the electoral campaign but were seen in the premises of the office⁴⁹ or accompanying a Red-Nord team, who had to perform the installation of street lighting was invoked therein⁵⁰. In one case the electoral body found that the actions taken were of a personal nature, the written warning being applied therein, and in another case, the complaint has been returned as if it had been filed contrary to the provisions of art. 71, para. (1) of the Electoral Code.

4.2. Examination of complaints lodged in the context of the new parliamentary elections

According to Promo-LEX observers, **five complaints** were lodged with **the CEC**, whilst **two complaints** have been lodged with the DEC (UC no. 17, UC no. 50). Of these, three complaints have been lodged by the PUN, one by the ACUM Bloc and the PSE each, by an independent candidate and, by one voter, respectively.

Five complaints have been lodged against actions/inactions and decisions of electoral bodies, while two of them have been lodged against candidates nominated by the ACUM Bloc and PDM.

Complaints lodged therein covered the registration/non-registration of electoral competitors - 4, use of administrative resources during electoral campaign - 1 or financing of the electoral campaign and conducting electoral agitation in violation of the legal provisions - 1 as well as changes in the addresses of the polling stations - 1.

As for **the solution adopted therein**, the electoral bodies approved decisions to reject the complaints lodged in five cases, and returned the complaints lodged therein in two cases.

In respect of the observance of **the deadlines for resolving the complaints**, it should be noted that two complaints have been solved or an answer has been provided within two days, four complaints – have been solved within three days, while a complaint has been returned within three days as of its submission, and after removal of shortcoming identified therein it has been solved within four days. We note that most of the complaints were solved within the timelimits prescribed in the Electoral Code.

48. Signature and issue of two certificates on taxable income.

49. Al. Conac (PSRM) vs DEC 19/2 Balatina.

50. Group of voters vs M. Snegur (PLDM).

V. DESIGNATION AND REGISTRATION OF COMPETITORS

5.1. Designation and registration of competitors for the general local elections

5.1.1. Activities that can be qualified as early designation of candidates

In accordance with art. 46 of the Electoral Code, designation of potential electoral candidates is made after the constituencies and constituency councils are established, and parties, other socio-political organizations, electoral blocs and citizens have the right to designate them. The deadline for the submission of registration files for DEC II was set for 30 August – 19 September, while in the case of DEC I, for 9 – 19 September 2019, respectively.

Contrary to the aforementioned, the Promo-LEX EOM identified at least 17 cases⁵¹ that can be qualified as early public nomination of candidates, of which 9 cases covered the USB, while 8 cases covered the ACUM electoral bloc. Announcements on the designation of candidates have been made publicly available on social networks.

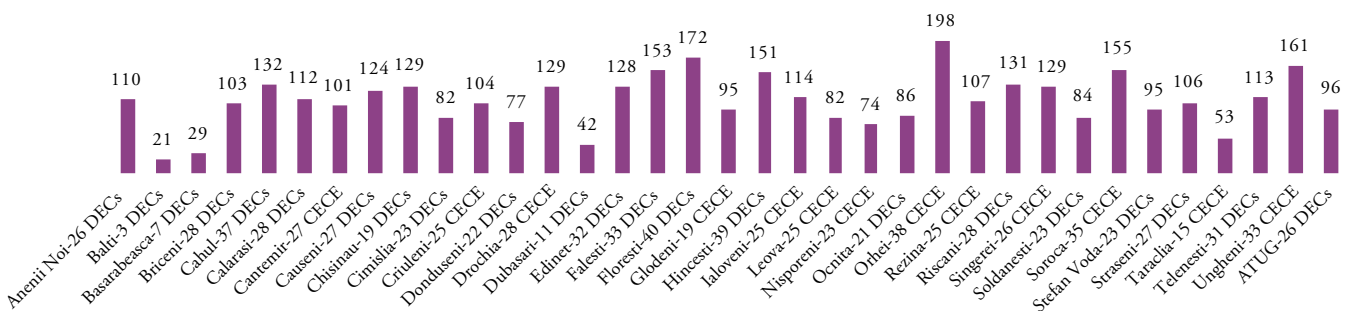
The Promo-LEX EOM reiterates its position regarding the need to extend the period for the designation of candidates in the case of local elections, which is shorter compared to parliamentary and presidential elections. In addition, the legislation does not provide for penalties for such violations.

5.1.2. Registration of candidates running for mayor

At least 3 778 candidates running for mayor have been registered with 898 DEC. Most candidates have been registered with EC II Orhei – 198, Floresti – 172 and Ungheni – 161.

Chart no. 31

Candidates registered for the position of mayor per region

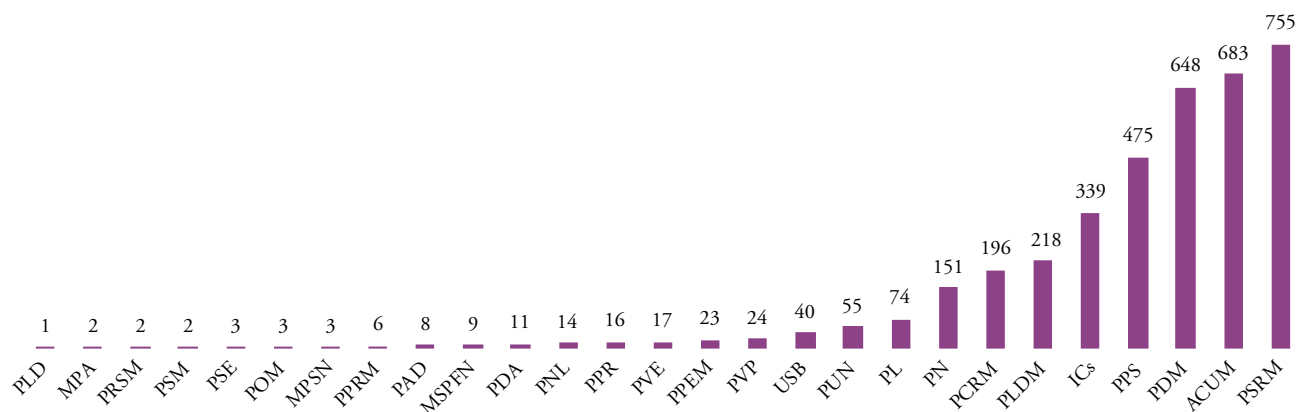


According to the data shown in chart no. 32 below, it was found that most candidates were designated and registered depending on their political membership, as follows: the PSRM (755), the ACUM Electoral Bloc (683) and the PDM (648). Only 27% of all candidates registered therein are women, of which 92% have been nominated by 26 political parties and only 8% stood as independent candidates. Therefore, we find that women remain under-represented at the level of elective functions.

51. Reports no. 1 (p. 24) and no. 2 (p. 27). Monitoring of general local elections and new parliamentary elections of 20 October (3 November) 2019. <https://bit.ly/2pJ8z9u>, <https://bit.ly/2KIDrhx>.

Chart no. 32

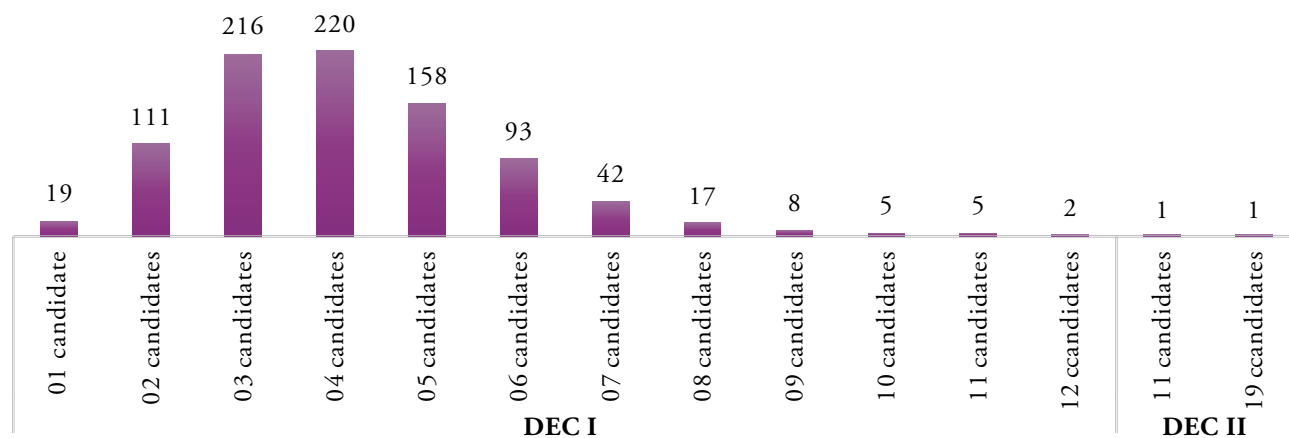
Candidates in line with their political affiliation



3-5 candidates each have been registered in the case of 66% of DEC I, whilst 11 candidates (Balti) and 19 candidates (Chisinau) respectively have been registered in case of two DEC II.

Chart no. 33

Number of candidates registered by the DEC



Of 3 778 candidates registered therein, 339 (9%) stood as independent candidates. Most ICs have been registered with DEC II ATUG – 36, Cahul – 19 and Stefan Voda – 19.

Chart no. 34

Independent candidates registered for the post of mayor



Of 339 ICs registered therein, only 26 (8%) were running for mayor in the districts, whilst no independent candidate running for mayor of Balti and Chisinau municipalities have been registered therein. Registration of the candidature of Ruslan Codreanu was rejected on the grounds that the signatures validated therein were insufficient.

In the opinion of Promo-LEX, the situation described above was caused by the exaggerated number of signatures, which has to be collected by independent candidates. We should remember that, Promo-LEX, on a number of occasions has drawn the attention of legislator to the exaggerated number of signatures required for the registration of an independent candidate in Balti municipality (about 5 500) and Chisinau municipality (10 000). In this regard, it is necessary to revise the calculation formula so that the number of signatures in the subscription lists could fall within the limits imposed by the Code of Good Practice in Electoral Matters (not more than 1% of the total voters).

5.1.3. Registration of candidates running for councillors

Compared to the general local elections of 14 June 2015, the number of political mandates of local councillors was reduced in at least 52 ATUs I and two ATUs II, and increased in eight ATUs I in the current elections⁵². 5 353 files have been registered with 896 DEC's I and 35 files with DEC's II (more than 51.4 thousand persons) running for councillors (see chart no. 35 below). Most files have been registered with ATUG (424), Orhei district (240) and Ungheni district (214).

Chart no. 35

Files registered for the post of councillor

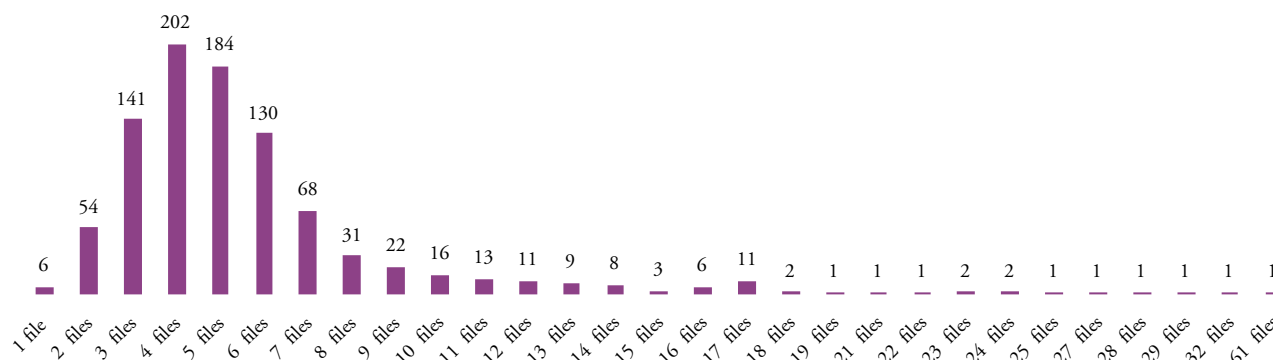


52. Report no. 2. Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, p. 26. <http://bit.ly/35CPNQW>

According to the number of files registered per DEC, we note that 3-4 files each have been registered with 37% of the DEC, whilst 5-6 files each have been registered with 34% of the DEC (see chart no. 36). Most files have been registered with the DEC I no. 36/1, Comrat (61 files), DEC no. 36/16, Congaz (32 files) and DEC no. 36/26, Tomai (29 files).

Chart no. 36

Number of files registered per DEC



Of all 5 353 files registered therein, 1 026 files belonged to independent candidates (see chart no. 37 below). Most ICs have been registered in ATUG (344), Ialoveni (49) and Chisinau municipality (47). Only 174 (17%) of the ICs registered therein were women.

Chart no. 37

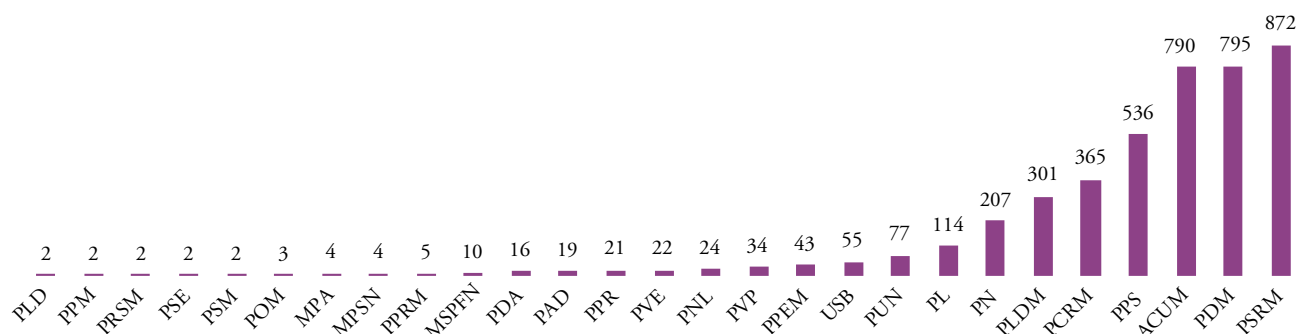
Registration of ICs for the post of councilor



When classifying the files registered therein taking into account the political parties submitting them, we find that the most registered files belonged to the PSRM – 872, the PDM – 795 and ACUM electoral bloc – 790.

Chart no. 38

Registered files of political parties running for councilors



5.1.4. Refusal of the electoral bodies to register the candidates designated therein

At least 11 cases on the refusal of electoral bodies to register the files of candidates running for mayor have been reported in the context of general local elections. Of these, eight cases (73%) covered the ICs (insufficient valid signatures in subscription lists), one case – the PPM (early designation of the candidate), another case – the PPRM (file submitted with errors) and the other case – the PPVP (incomplete file).

In the same context, we note that at least 22 cases have been identified therein on the refusal of electoral bodies to register the candidates nominated for the position of councillors due to the fact that files belonging to them did not comply with the applicable legal provisions. Of these, 10 cases (45%) covered ICs (insufficient valid signatures in subscription lists), four cases – the PCR, two cases – the PDM, one case – the PN, one case – the PPM, one case – the PPRM, two cases – the PPS while one case – the PSM (files were submitted with errors; early designation of the candidates or non-compliance with gender quota).

5.1.5. Invalid registration of electoral candidates running for councillors in respect of observance of the provisions on gender balance

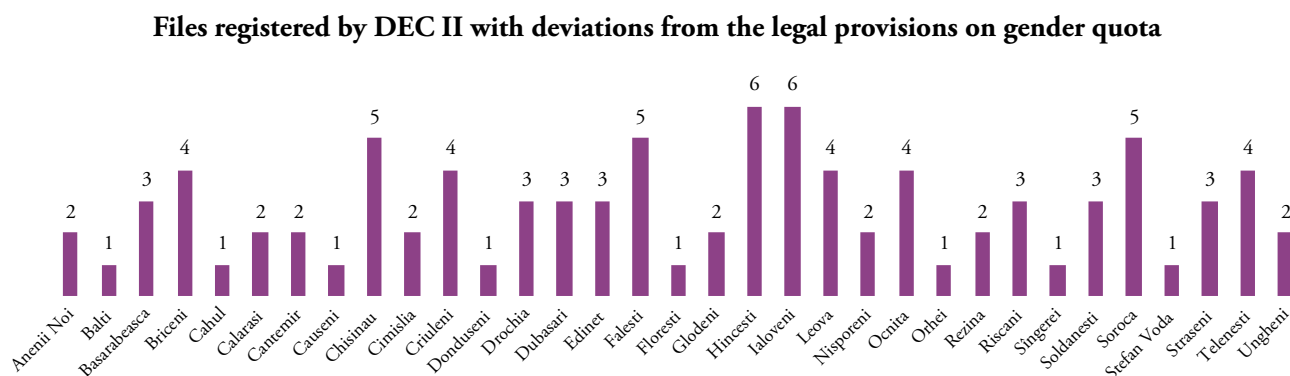
According to art. 46, para. (3) of the Electoral Code, the list of candidates for the local elections shall be drawn up while complying with the minimum representation rate for both genders (40%). The candidates are placed on the lists according to the following formula: at least four candidates per every ten positions. However, by way of derogation from the aforementioned provisions⁵³, the rule for at least three candidates per every ten positions has been established for the general local elections of 20 October 2019.

In order to facilitate the work of the inferior electoral bodies, on 9 September 2019, the CEC approved a circular letter⁵⁴, setting out, by way of recommendation, the minimum number of candidates of the same gender needed to be included in the lists in order to comply with the provisions on the gender quota. Having performed the mathematical calculations of the data contained in the circular letter, it was found that in at least 21 cases of those indicated therein, the minimum result based on the figures established by the CEC is below 40%. Thus, for example, it was indicated that in the case of 36 candidates, at least 14 must be of the same gender - which would constitute 38.88% of the total number of candidates.

Following the analysis of the lists of candidates submitted with the electoral bodies (where possible), at least 92 cases of registration of candidates found in 21 DEC's show deviations from the provisions on gender balance (see chart no. 39 below). Most files showing deviations have been registered with DEC II Hincesti, Ialoveni, Chisinau, Falesti and Soroca.⁵⁵

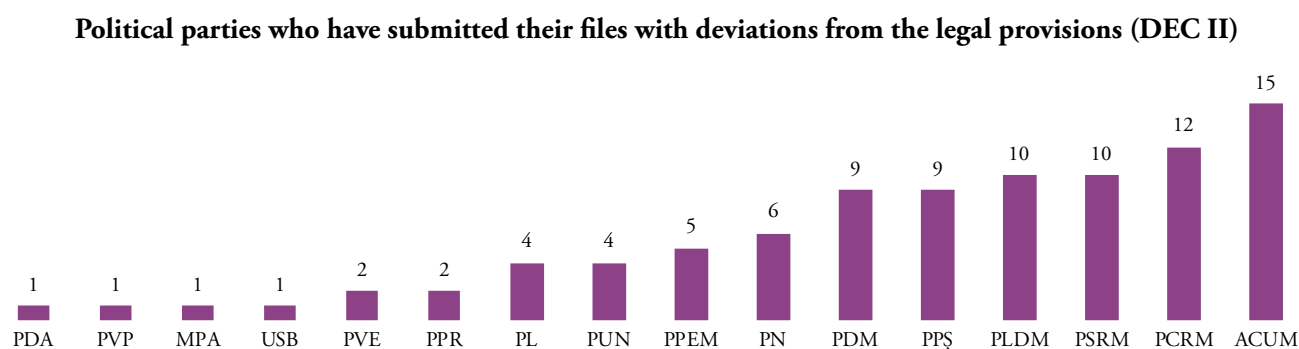
53. Exception made through art. VII of the Law 113/2019.
 54. Circular Letter no. CEC 8/1049 of 09.09.2019. <https://bit.ly/2n0R6rl>
 55. Details given in the Reports no. 3 and no. 4 of the Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, p. 60, and p. 74 respectively.

Chart no. 39



The chart no. 40 shows the information on political parties, the files of which showed deviations, yet they have been registered. Thus, we note that most files showing deviations from the applicable legal provisions belonged to the ACUM Electoral Bloc (15), the PCRM (12), the PSRM (10) and the PLDM (10).

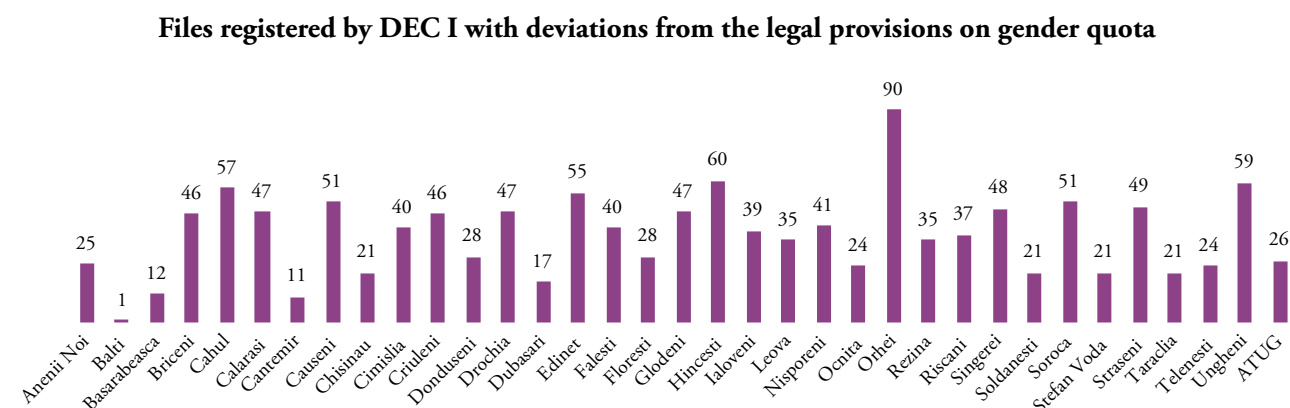
Chart no. 40



We note that at least 30% of the files of political parties registered with the DEC II showed deviations from the provisions on gender balance (the DEC II registered at least 309 files belonging to political parties).

At least 1 300 cases where the lists submitted by political parties did not comply with the legal provisions on gender balance and placement of candidates on the list, but still registered with 630 DEC I (see chart no. 41 below) have been reported at the level of DEC I. Most files showing deviations have been registered in the districts of Orhei (90), Hincesti (60) and Ungheni (59).

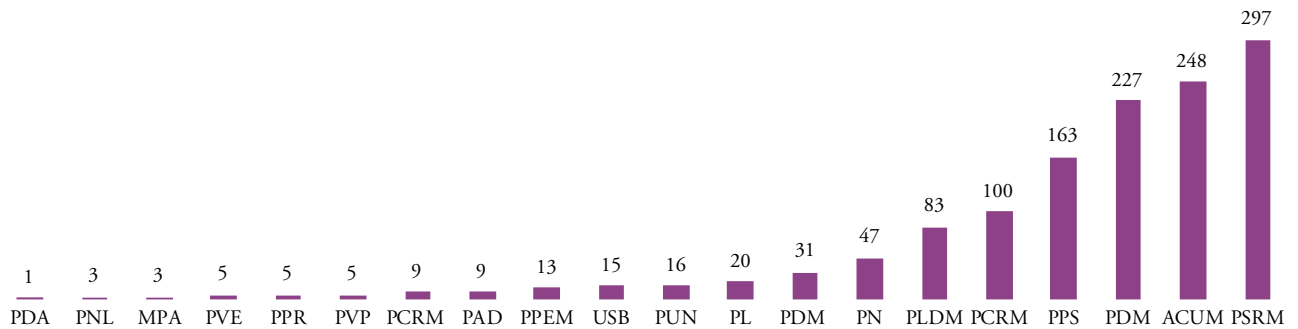
Chart no. 41



The chart no. 42 shows the information on political parties, the files of which showed deviations, yet they have been registered. Thus, we note that most files showing deviations from the applicable legal provisions belonged to the PSRM (297), the ACUM electoral bloc (248) and the PDM (227).

Chart no. 42

Political parties who have submitted their files with deviations from the legal provisions (DEC I)



In the light of the above, we note that at the level of DEC I, at least 32% of the files of political parties registered therein showed deviations from the provisions on gender balance.

5.1.6. Registration of candidates based on designation minutes adopted before the legal term set

In accordance with the provisions of art. 46 of the Electoral Code, designation of potential electoral candidates is made after the constituencies and constituency councils are established.

In view of the above, the deadline for setting up the DEC II was 30.08.2019, while for the DEC I – 09.09.2019. However, there have been identified at least eight cases in which political parties have submitted the designation minutes before the legal term set therein. Of these, five cases covered the PDM, one case – the PPVP, another case – the PCRМ, one case – the PL⁵⁶.

Despite the deficiencies noted therein, we observe that the electoral bodies have registered the aforementioned electoral candidates in the elections. There are also precedents in which the DEC have not registered the candidates nominated beyond the legal deadline (refusal of the DEC no. 1 Chisinau to register both the list and candidate running for general mayor nominated by the PPM, as well as the refusal of the DEC no. 27 Rascani to register the list submitted by the PSM).

5.1.7. The non-uniform application of the provisions of art. 47, para. (3) of the Electoral Code at the time of registration of independent candidates

The Promo-LEX EOM has found some practices of non-uniform application of legal rules when checking the accuracy of subscription lists’ filling as for complying with the obligation of the fact that one list shall include only signatures of supporters residing in a single settlement. These legal provisions served as legal basis for cancelling the signatures in the case of the IC Ruslan Codreanu, but in at least four DEC II at least six subscription lists belonging to independent candidates running for district councillors have been identified where the aforementioned provision has not been complied with when checking these lists⁵⁷.

.....

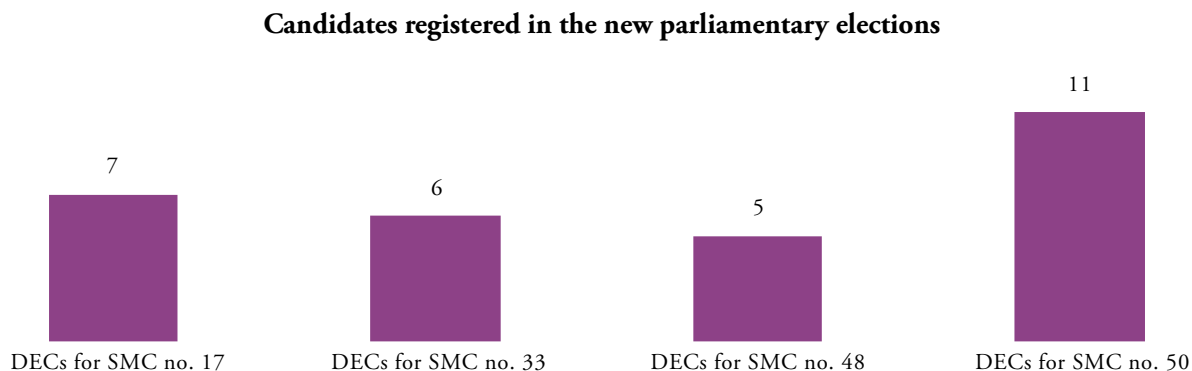
56. Reports no. 3 (p. 30) and no. 4 (p. 36) of the Promo-LEX Election Observation Mission. Parliamentary Elections of 24 February 2019. <https://bit.ly/2KRvdUd>, <https://bit.ly/2XMzSfn>.

57. Report no. 4. Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, pages 41-42. <http://bit.ly/2pYTXT4>

5.2. Registration of candidates for the new parliamentary elections

29 candidates (see chart no. 43 below) have been registered for the new parliamentary elections. Most candidates have been registered with DEC for SMC no. 50 (west of the Republic of Moldova). We note that DEC for SMC no. 50 is the only constituency in which the number of registered candidates is equivalent to the initiative groups registered in support of the electoral competitors (all the nominated candidates have been registered).

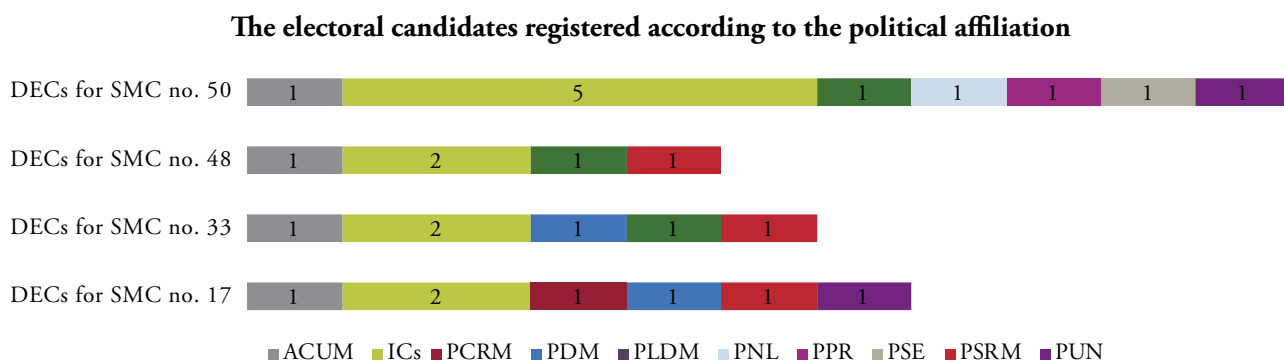
Chart no. 43



Unlike DEC for SMC no. 50, in the other three constituencies the registration of 10 candidates has been rejected, due to insufficient number of valid signatures in the subscription lists (1 – DEC for SMC no. 17, 5 – DEC for SMC no. 33, 4 – DEC for SMC no. 48).

Chart no. 44 below shows the electoral candidates registered according to the entity designating them. Thus, we note that only the ACUM electoral bloc had candidates registered in all four electoral councils of the uninominal electoral constituency.

Chart no. 44



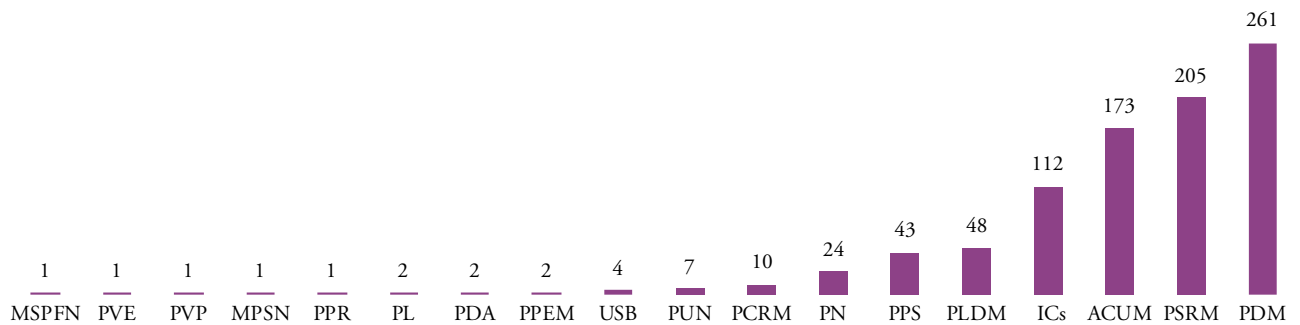
5.3. Party membership of candidates elected in the general local elections and new parliamentary elections

5.3.1. Results of the general local elections

Following the general local elections (round I and II), depending on the political affiliation, of 898 mayoral positions, 112 (12%) were occupied by ICs and, respectively, by 786 representatives of 17 political parties (see chart no. 45 below). Most mayors elected have been nominated by the PDM (261), the PSRM (205) and the ACUM electoral bloc (173). Of all mayors elected, 22% (195) are women, of whom only 13% (26) stood as independent candidates.

Chart no. 45

Mayors elected in line with their political affiliation



5.3.2. Results of the new parliamentary elections

As for the new parliamentary elections, compared with the balance of powers established after the parliamentary elections of 24 February 2019, we note that only the PSRM increased its number of MPs (from 35 – to 36, the PSRM candidate being ranked in first place in DECs for SMC no. 48, in the Transnistrian region). The PDM did not make any changes in the number of MPs due to the fact that the PDM candidate was ranked in first place in the DECs for SMC no. 17, Nisporeni. Same situation – preserving the same number of MPs – was observed in the case of ACUM electoral bloc (the candidates of the political part won the elections in DECs for SMC no. 33 and no. 50.)

VI. VOTERS' LISTS AND STATE ELECTORAL REGISTER

6.1. Evolution of data from the State Registry of Voters (SRV)

Contrary to the previous practices, when the CEC published data from the SRV at the beginning of each electoral period, this time, as of 20 October 2019, the information on the number of voters has been displayed on the website of the authority on 22 August 2019 (considering that the electoral period for the new parliamentary elections started on 2 August, while the one for local elections on 19 August 2019).

The continuous increase in the number of voters in the SRV, against the background of a negative natural growth of population of the Republic of Moldova since 1999, raises concerns as to the quality of the management of the State Registry of Population (SRP), and, implicitly, of the SRV. Compared to previous elections, we note that the number of voters has continuously grown: over eight months their total has increased by about 20 thousand. There was also witnessed an increase in the number of voters without a place of domicile/residence who were not able to vote in the local elections. Paradoxically, but the CEC has reduced the number of mandates of councilors in the local councils of the second and first level, compared to 2015, due to the decrease in the number of the population in the respective ATUs.

Table no. 1. Dynamics of the number of voters (2017–2019) based on SRV data

Date	Total number of voters	Dynamics	Number of voters without registered domicile/residence	Dynamics	Number of voters from ATU in Transnistria and mun. of Bender	Dynamics
01.09.2017 ⁵⁸	3 255 361	-	155 683	-	225 971	-
10.12.2018 ⁵⁹	3 265 997	+10 636	210 890	+55 207	230 233	+4 262
22.08.2019 ⁶⁰	3 285 894	+19 897	224 250	+13 360	243 416	+13 183

6.2. Accessibility of voters' lists

In the context of the elections of 20 October 2019, in line with the amendments made to the Electoral Code, the CEC has developed in addition to the basic voters' lists in A3 format, one copy for each PS which has to include only the first name, last name and the year of birth of each voter (A4), accessible both on the official website of the CEC, as well as in the polling stations.

Against this background, the Promo-LEX EOM recalls that, contrary to the legal provisions, in the case of at least 21 PSs the observers had limited access to the basic voters' lists in A3 format, including on the grounds that only those in A4 format, of an incomplete content shall be available to the observers.

58. <https://bit.ly/2UxYmaf>

59. <https://bit.ly/2L8YGtG>

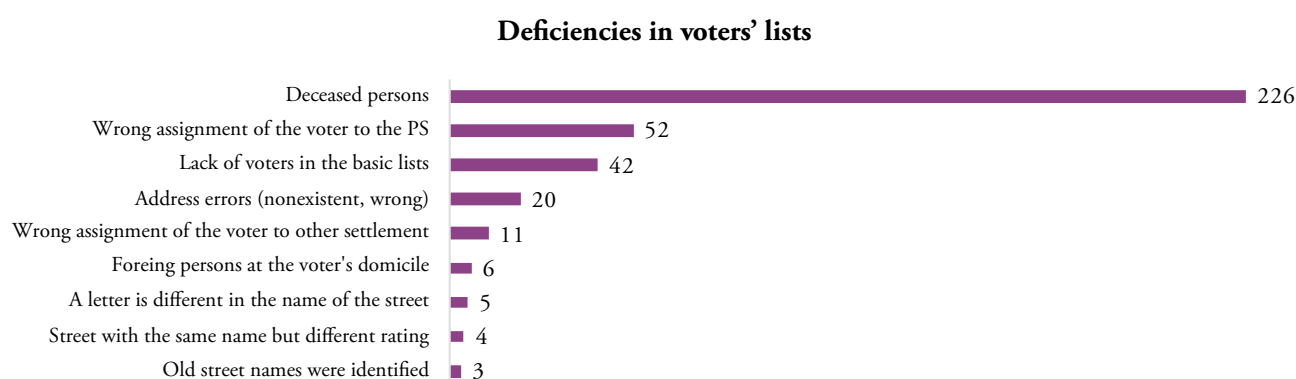
60. <http://bit.ly/2jZLSuO>

6.3. Issues identified by others in the voters' lists

The Promo-LEX EOM continue to reveal problems with the quality of basic voters' lists (see chart no. 46 below). Among the impact issues we could mention the wrong assignment of voters to PSs other than those based on their registered domicile/residence. However, already following a period of ten years since the approval of the Conception on SAIS Elections⁶¹, the cases of wrong assignment of voters as part of a group, e.g. about 230, are being constantly challenged⁶².

Quantitatively, the most frequent issue in the electoral lists was the presence of the deceased persons - in at least 11.5% of the PSs (226 PSs).

Chart no. 46



6.4. The phenomenon of “artificial migration of voters”

The Promo-LEX EOM underlined in its intermediate reports⁶³, that the phenomenon of “artificial migration” of voters during the electoral period remains a legally unsolved problem, including in the context of general local elections of 20 October 2019. We should remember that this phenomenon refers to the situation where voters change their domicile on the eve of the elections, which automatically leads to obtaining the right to vote in the corresponding constituency.

The Promo-LEX EOM considers that in at least 29 ATUs of level I there were suspicions on the artificial migration of voters, due to the identification of at least three requests for residence registration, as well as domicile registration⁶⁴. In particular, we should mention the ATU *Egoreni, Soroca* (21 – residence, 4 – domicile); *Topala, Cimislia* (12 – residence, 7 – domicile); *Calimanesti, Nisporeni* (10 – residence, 1 – domicile); *Racovat, Soroca* (9 – residence, 6 – domicile).

The migration also continued between the first and second rounds of local elections. There were at least one case – Sadaclia village, Basarabeasca, where the observer identified seven citizens entitled to vote, but having temporary residence as of 25.10.2019.

61. Law no. 101 as of 15.05.2008 on the Conception of the State Automated Information System “Elections”. In: Official Gazette no. 117-119 as of 04.07.2008. <http://bit.ly/2KCNbtK>

62. For further details please see: Report no. 4. The Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, pages 41-42. <http://bit.ly/2pYTXt4>

63. Report no. 1. The Promo-LEX Election Observation Mission of General Local Elections and New Parliamentary Elections of 20 October 2019, pages 15, 20. <http://bit.ly/2kpYRpL>; Report no. 4. The Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, pages 40-41. <http://bit.ly/2pYTXt4>; Report no. 6. The Promo-LEX Election Observation Mission. General Local Elections and New Parliamentary Elections of 20 October 2019, pages 18-19. <http://bit.ly/346Qj8P>

64. As a research object were identified the settlements the analysis of which under the aspect of artificial migration is possible due to the lack, as a rule, of the internal mechanical movement of the population during the inter-election period. For further details please see: Report no. 6. The Promo-LEX Election Observation Mission. The General Local Elections and New Parliamentary Elections of 20 October 2019, pages 18-19. <http://bit.ly/346Qj8P>

6.5. Voting under the voters' lists available at the domicile

The Promo-LEX EOM draws attention to the large number of requests on voting at the domicile. We consider that this trend must be monitored by the CEC in order to prevent excesses with the potential to influence the final results. According to section 40 of Code of Good Practice in Electoral Matters, *the use of mobile ballot boxes is not recommended, as it is accompanied by a high risk of fraud*. However, if used, some strict conditions must be observed to prevent fraud. In this regard, it would be useful to include in the minutes of counting votes an additional section in which the number of voters who voted based on the voters' lists at the domicile would be recorded. However, in the current version, post-factum monitoring of the impact of the "mobile ballot box" is practically impossible. The impact of the issue can be decisive in the context of local elections.

Based on information provided by STO of Promo-LEX on elections day of 20 October 2019, in about 132 (18%) of PEBs of the total of 740 observed⁶⁵, the number of requests to vote at the domicile ranged from 30 to 107. Of these, in at least 10 DEC I the difference between the first two candidates is smaller than the number of requests to vote at the domicile submitted therein (see Annex no. 17).

In particular, we should mention Brinzeni village, Edinet, where 231 requests to vote at the domicile have been submitted, of which 20 have been submitted by the psycho-neurological boarding school in the locality. The difference between the candidates in the second round of the elections was 53 votes⁶⁶. The trend in question is a dangerous one for the transparency, security and integrity of the electoral process, but also for securing the secret vote.

6.6. Registration of voters in the supplementary list

According to the applicable legal provisions⁶⁷, in the case of local elections, the number of voters registered in the supplementary voters' lists should be a minimum one, at least for the reason that: the vote entitlement certificate shall be used by the office members only; voters without registered domicile/residence shall not be entitled to vote; military staff shall not be entitled to participate in the elections; people admitted to hospitals or detained shall participate in the elections only if they hold domicile/residence in the respective ATU.

The Promo-LEX EOM draws attention to the fact that in at least 19 EC I the number of voters who voted on supplementary lists is greater than or equal to the difference of votes between the first two candidates (in all cases being the second round of elections), being analyzed the cases when the result of the decrease of the votes accumulated by them is less than or equal to 50 (see Annexes no. 8 and no. 9). We can also include here suspicions on artificial migration of voters.

65. In addition, the PSs in Balti and Chisinau municipalities where voting took place on the basis of the lists sent by the administration of hospitals and prisons were not taken into account.

66. The minutes of totalizing the voting results for the position of mayor: <http://bit.ly/2KEU0uO>

67. Art. 44 of the Electoral Code and sections 35-36 of the Regulation on the creation, management, distribution and update of the voters' lists.

VII. PUBLIC ADMINISTRATION

7.1. Publication of the information of public interest on the LPA official webpages

According to the relevant legislation⁶⁸, the local public administration shall be required to publish the financial statements of independent candidates on its webpage. In the context of the specific traits of the local elections, we believe that citizens should be informed in the widest possible way namely by the LPA, in particular level II LPA, which, on the one hand, have available webpages, and, on the other hand, have such an obligation⁶⁹. This with the conditions under which the CEC's webpage will become overloaded if all the information pertaining to candidates in the ECs I/ECs II should ever be published. In addition, neither DEC II nor DEC I have their own webpages.

Out of 32 webpages managed by district councils, only LPA II Floresti published the decisions on the setting up of the DEC I in the respective constituency. As to the publication of financial statements of independent candidates, no webpage of the level II LPA where the information had to be placed was identified.

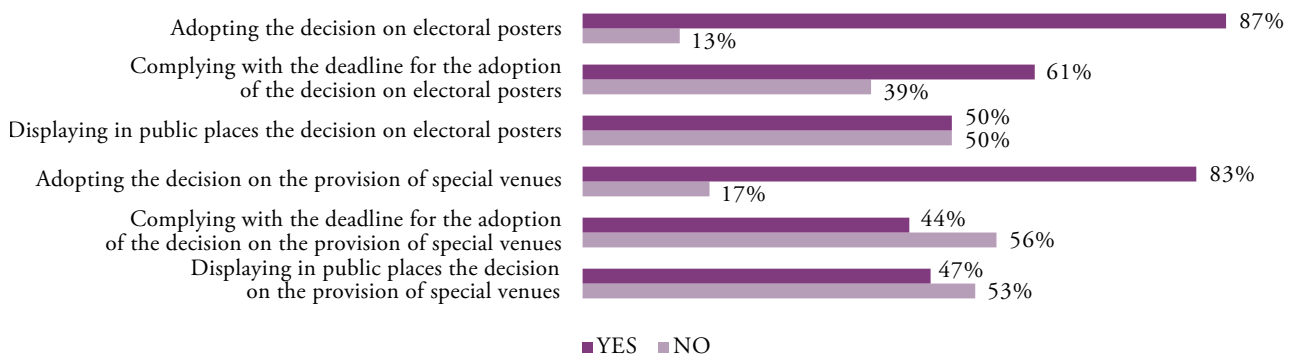
7.1. Establishment of Places for Electoral Posters and Venues for Meetings with Voters

In accordance with the provisions of the Electoral Code⁷⁰, the LPAs are obliged to establish and ensure, within 3 days since the initiation of the election period, the minimum number of special places for electoral posters, the minimum number of venues for meetings with voters. These decisions/provisions shall be immediately displayed at the offices of these authorities.

During the monitored period, the Promo-LEX observers visited 898 LPAs, of which 778 (87%) passed the decision on ensuring special places for electoral displays. As for the observance of the deadline for approving such decisions, only 550 (61%) have approved them within three days since the initiation of the election period.

Chart no. 47

Compliance with the requirements on the decisions of display and provision of special venues for the meetings with voters



On the matter of decisions on the provision of special venues for the meeting of the candidates with the voters, 745 (83%) of LPAs adopted such decisions, of which only 391 (44%) have been approved within the 3 day legal deadline. Moreover, most of LPAs failed to take into account the requirement on displaying such decisions in visible special places or at their offices (see chart no. 47).

68. Art. 43, para. (5) of the Electoral Code of the Republic of Moldova.
 69. Report no. 3. Observation Mission for the General Local Elections and New Parliamentary Elections of 20 October 2019, p. 32. <https://bit.ly/35nWky2>.
 70. Art. 52, para. (9) of the Electoral Code of the Republic of Moldova.

7.1. Arranging places for electoral posters

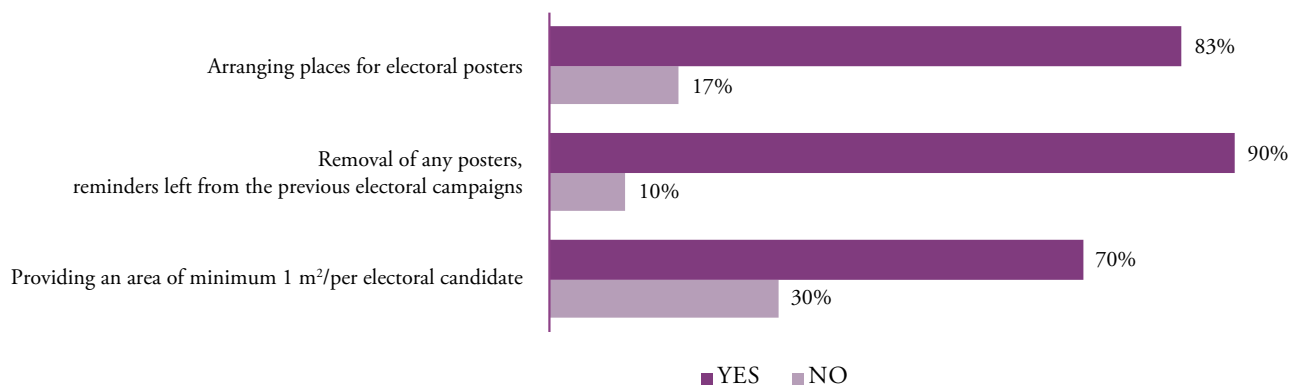
According to the legal provisions⁷¹, the LPAs are required to ensure in advance the removal of any posters, inscriptions and reminders left from the previous electoral campaigns and place the electoral poster panels uniformly throughout the territory of the locality. The minimum area provided to an electoral candidate for advertising display is 1 m².

Of 898 LPAs visited, 743 (83%) arranged the places for electoral posters and only 632 (70%) provided an area of 1 m² per electoral candidate.

The posters left from the previous elections of 24 February 2019 were not completely removed, and therefore, of 898 LPAs, there have been 81 (10%) cases where the Promo-LEX observers identified posters left in public spaces from the previous elections. However, authorities responsible for maintaining public order together with LPA shall establish and ensure the removal of such posters⁷².

Chart no. 48

Compliance with the requirements on the arrangement of places for electoral posters



71. Sections 6-7 of the Regulation on the placement of electoral advertising and political promotion materials on billboards, approved by the CEC's Judgment no. 3 328 of 28.04.2015, as amended. <https://bit.ly/2mK2esu>

72. Section 20 of the Regulation on the location of electoral advertising and political promotion materials on billboards: "Authorities responsible for maintaining public order together with the local public administration shall establish and ensure the removal of electoral advertising and/or political promotion materials placed on billboards, which do not meet the requirements laid down in art. 52, para. (3), (4) and (8) of the Electoral Code".

VIII. ELECTORAL COMPETITORS

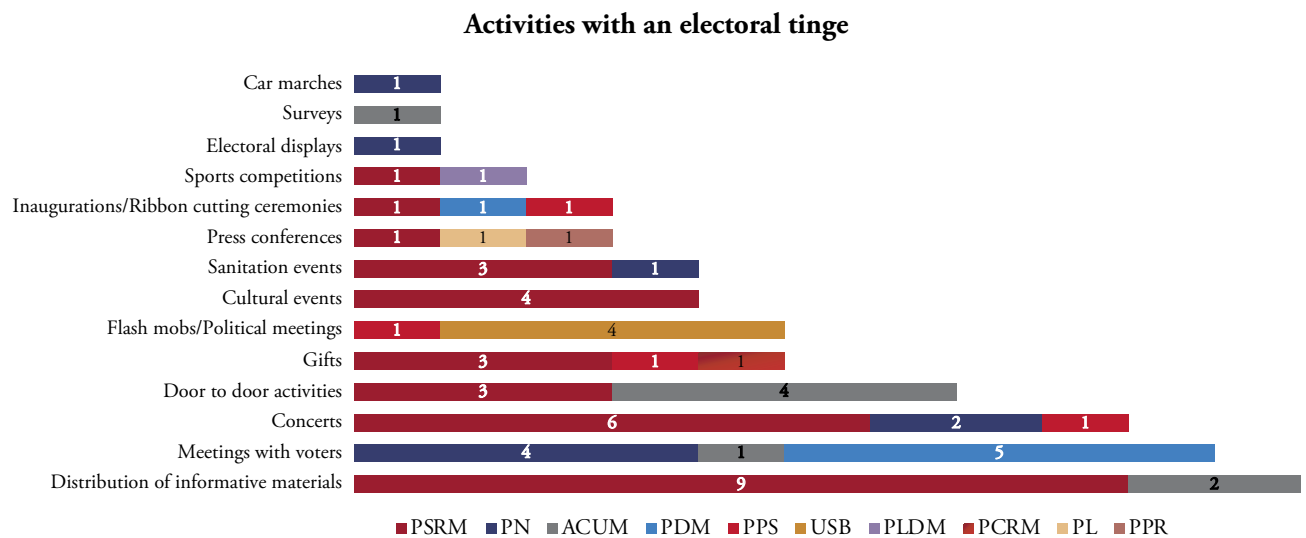
8.1. Promotion Activities

8.1.1. Promotion activities carried out in the context of general local elections prior to the legal deadline set for it

According to art. 1 of the Electoral Code, in the case of general local elections, electoral candidates may begin electoral campaign activities, on the date of their registration by the constituency council. The electoral campaign implies the candidate’s right to carry out electoral campaigning activities.

However, contrary to the above, during the observed period, until setting up the level I and II electoral bodies, the Promo-LEX observers identified at least 66 cases that can be qualified as activities with an electoral tinge.

Chart no. 49



Most of the activities were carried out by the PSRM (47%), the PN (14%) and the ACUM Bloc (12%). The most popular promotional activities were distribution of informative materials (16%), meetings with citizens (15%) and organization of concerts (14%).

8.1.2. Activities to promote candidates in the context of general local elections

According to the observers of the Promo-LEX EOM, during the observed period at least 2 404 electoral campaign activities have been carried out (see table no. 2). The most popular promotional activities were meetings with voters (33%), distribution of informative materials (23%) and electoral displays (22%). In contrast to the local elections of 2015, the number of concerts organized therein decreased by about 10 times of the total of activities carried out – from 21% to 2%.

Table no. 2. Activities to promote candidates

N/O	Activities to promote candidates	PSRM	ACUM	PN	PDM	PPS	PUN	PLDM	PCRM	PL	PPR	USB	PPEM	ICs	Other parties	Total
1	Meetings with voters	224	183	89	98	73	49	15	5	4	9	4	3	22	5	783
2	Distribution of informative materials	239	94	89	30	39	12	4	10	8	11	2	7	8	8	561
3	Electoral displays	145	94	44	34	52	18	27	9	14	4	6	5	63	17	532
4	Electoral debates	12	13	7	10	16	5	6	14	4	5	2	2	12	15	123
5	Door to door activities	37	18	7	9	7	2	7	5	1		1	2	9	1	106
6	Press conferences	22	8	2	3	5	3		2	7	8	9	3	2	12	85
7	Campaign launch activities	5	28	1	13	1	5	8		2	1	3	1	4		72
8	Concerts	19	6	2	1	6	3	1	1	1				1		41
9	Cultural events	19			1	14										34
10	Gifts	9	3	2	9	1	2			1					1	28
11	Flash mobs/Car marches/Competitions	2	2	1	6	2				3		2	1			19
12	Sanitation events	6	1	1	1					1		1		1		12
13	Inaugurations and surveys	3			3			2								8
	Total	746	450	245	218	216	97	70	46	44	36	30	24	122	58	2404

Most of the activities were carried out by the PSRM (31%), the ACUM Bloc (19%) and the PN (10%). According to the regions in which electoral activities have been carried out, it was found that most of them have been conducted in Chisinau (34%), Balti (8%), Cahul (4%) and Floresti (4%).

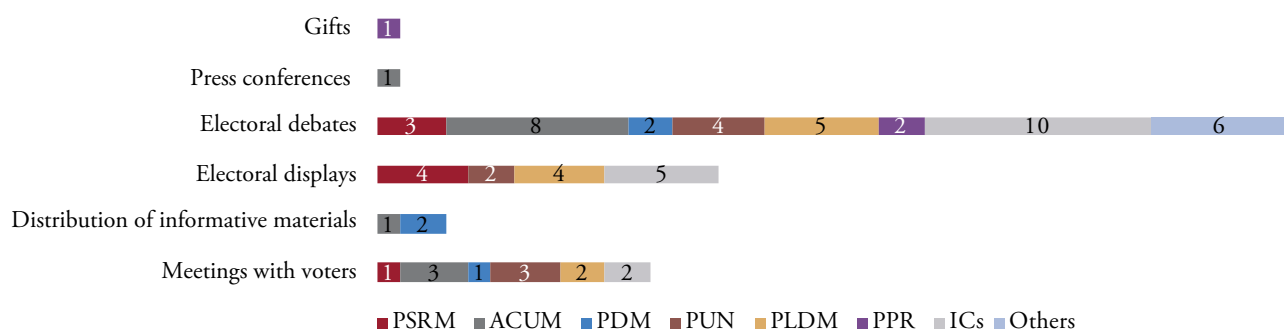
8.1.3. Activities to promote candidates in the context of new parliamentary elections

Compared with the local elections, the activism of the registered competitors for the new parliamentary elections was lower. The Promo-LEX observers reported the organization of the combined electoral events (e.g. electoral meetings) - with the participation of both electoral competitors designated by the same political parties (both for general local elections and for new parliamentary elections). However, at least 72 separate activities of the electoral competitors were identified in the context of the new parliamentary elections.

Thus, most events were conducted by ICs (17), the ACUM electoral bloc (13) and the PLDM (11). The favourite types of events reported therein were electoral debates (40), electoral displays (15) and meetings with voters (12).

Chart no. 50

Activities to promote candidates in the context of the new parliamentary elections



8.2. Activities that can be qualified as misuse of administrative resources for electoral purposes

The Promo-LEX EOM reminds the reader that the legislation on the use of administrative resources during the election period, and election campaigning in particular, is deficient. Despite the fact that the observation missions have constantly recommended the authorities to review the attitude on this issue, we find that even in the context of the current elections, even if the legal framework has been modified, the problem of explicit and full regulation of the use of administrative resources still remains unsolved.

In the context of general local elections and new parliamentary elections, the Promo-LEX EOM, taking into account the relevant international standards⁷³, drew attention to several issues on the misuse of administrative resources.

Use of public assets and/or public office for electoral purposes. At least eight cases have been reported in this category, three of which covered the ACUM electoral bloc, two – the PSRM, the other two – the PDM and one case – the PCRM (see Annex no. 4).

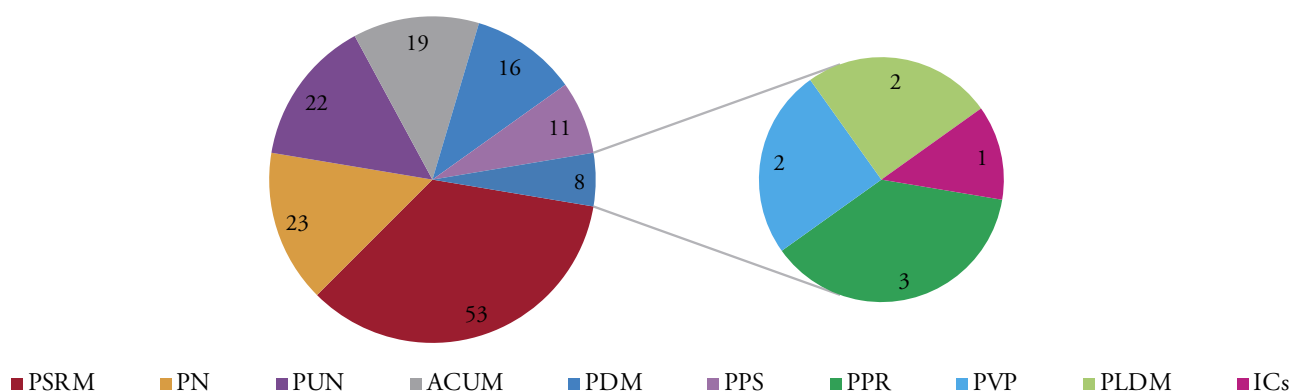
Electoral assemblies organized within state institutions with employees of these institutions during their working hours, remain to be a practice insistently used by electoral candidates. During the electoral period, at least 152 cases were reported, in which candidates held such meetings (see chart no. 51 and Annex no. 5). Most meetings were held by the PSRM – 53 activities (35%), the PN – 23 activities (15%) and the PUN – 22 activities (14%).



Electoral meeting of PPR, at IMSP Sfinta Treime, 16.10.2019,
source: <https://www.facebook.com/vlad.turcanu>

Chart no Chart no. 51

Conducting meetings within public institutions



Claiming merits for projects implemented/services performed at public expense is a practice which, in the opinion of the Promo-LEX EOM, also contains elements pertaining to the misuse of administrative resources⁷⁴. During the monitored period, the Promo-LEX observers reported at least 31 such cases (see Annex no. 6), of which 30 cases covered the PSRM, whilst one case covered the PLDM.

73. Report on the misuse of administrative resources during electoral processes adopted by the Council for Democratic Elections at its 46th meeting (Venice, 5 December 2013) and the Venice Commission at its 97th Plenary Session (Venice, 6-7 December 2013). <http://bit.ly/37NN607>

74. It is difficult to draw the net difference between the merits claimed by a certain political group for achievements decided by collective authorities at public expense, on the one hand, and the fulfillment of electoral promises, on the other. However, the Promo-LEX EOM draws attention to the cases when, for example, the use of different buildings of social and cultural significance provided for in the public budget is turned into work of a party involving political connotation.



Electoral meeting of PSRM candidate with workers from the Municipal Clinical Hospital „Sfintul Arhanghel Mihail”
 sursa: <https://www.facebook.com/Ion.Ceban.public>

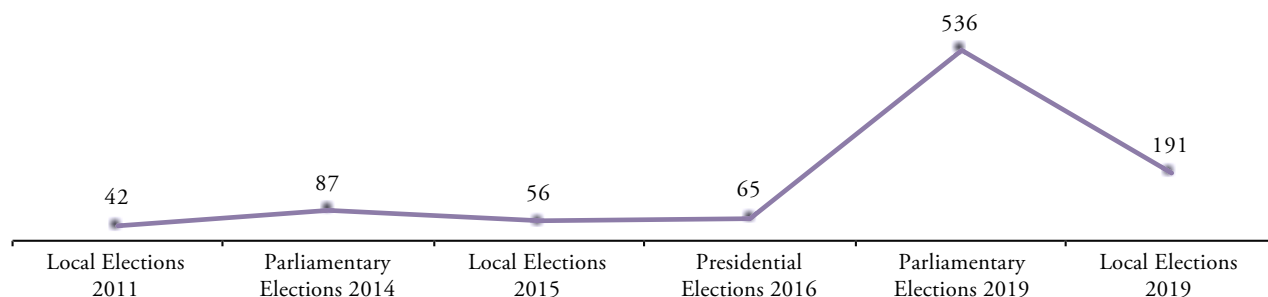
Unlike the parliamentary elections of 24 February 2019, in the elections of 20 October 2019, the Promo-LEX EOM identified no cases on the *use of public authorities’ headquarters for electoral purposes*⁷⁵.

Under the above circumstances, the Promo-LEX EOM stated that during the electoral campaign, the electoral candidates did not have equal opportunities in promoting their electoral messages. We emphasize that the misuse of administrative resources offers an undue advantage to candidates who use this mechanism in relation to other competitors, thus, prejudicing both the principle of equal opportunities and the voters’ freedom of opinion⁷⁶.

Compared to parliamentary elections of 24 February 2019, it should be noted that, during the general local elections and new parliamentary elections of 20 October 2019, the number of cases of misuse of administrative resources has decreased almost three times, but it still remains an issue.

Chart no. 52

Evolution of the use of administrative resources in the elections



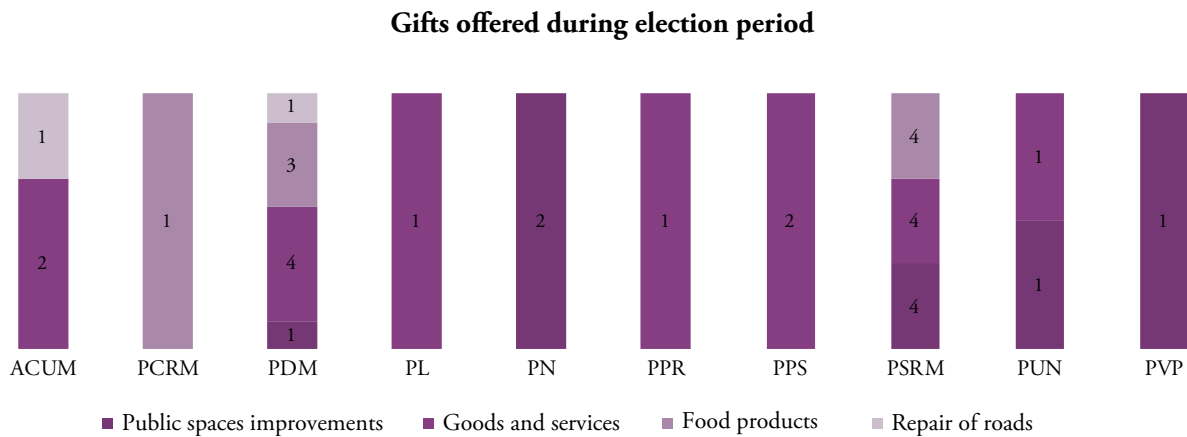
8.3. Activities that can be qualified as gift offerings during the election period

According to the legal provisions, offering or giving money, goods, services or other benefits in order to determine the voters to exercise or not to exercise their electoral rights in parliamentary, presidential, local elections or referenda is considered bribery of voters⁷⁷.

During the electoral period, the Promo-LEX EOM reported at least 34 cases (see Annex no. 7) which can be qualified as gift offering. Of these, 12 cases covered the PSRM (35%), 9 cases - the PDM (26%), while 3 cases - the ACUM electoral bloc (9%).

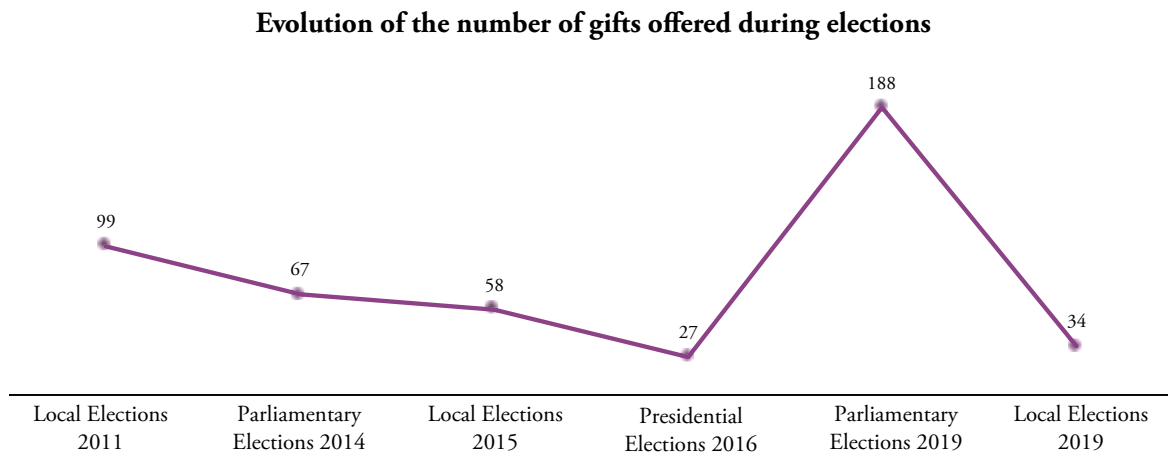
75. Final Report. The Promo-LEX Election Observation Mission for parliamentary elections of 24 February 2019, p. 51. <http://bit.ly/2JEmk0k>
 76. Report on the misuse of administrative resources during electoral processes adopted by the Council for Democratic Elections at its 46th meeting (Venice, 5 December 2013) and the Venice Commission at its 97th Plenary Session (Venice, 6-7 December 2013), pct. 17. <http://bit.ly/37NN607>
 77. Criminal Code of the Republic of Moldova, art. 181¹. <https://bit.ly/2LnHJdm>.

Chart no. 53



Compared to previous polls, during the general local elections and new parliamentary elections, the number of gifts offered has diminished.

Chart no. 54



8.4. Cases that can be qualified as use of public image

The Promo-LEX EOM identifies activities that can be qualified as involvement of the President of the Republic of Moldova (six cases)⁷⁸ in promoting candidates nominated by the PSRM for general local elections. We remind the reader that art. 52 para. (8) of the Electoral Code stipulates that “images representing state institutions or public authorities, whether from the country or abroad, or international organizations, cannot be used for electoral advertising purposes”. At the same time, we would question the very possibility of the President of Moldova to be involved in supporting an electoral competitor appointed by a political party, as long as art. 123, para. (2) of the Electoral Code obliges him to renounce the membership of any political party at the stage of his mandate validation.



The official launch event of the PSRM election campaign, 15.10.2019
 source: <https://www.facebook.com/greceanii>

78. Situations are described in the Reports no. 1-3. The Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October 2019.

In other at least three cases – the PDM (3)⁷⁹ and the PSRM (1)⁸⁰ candidates running for mayor or councillors were launched in the campaign using the image of the mayor’s office or the district council.

8.5. Cases that can be described as campaigning using the image of personalities from abroad

According to art. 52, para. (3) of the Electoral Code, in the activities of electoral agitation is prohibited the involvement in any form of the persons who are not citizens of the Republic of Moldova, and according to para. (8), the image of foreign official persons cannot be used for electoral advertising purposes. Contrary to these provisions, in the observed period at least 10 cases were found in which the image of personalities from abroad is used to promote the candidates. Of these, five cases covered the PUN, while the other five – the ACUM electoral bloc.⁸¹

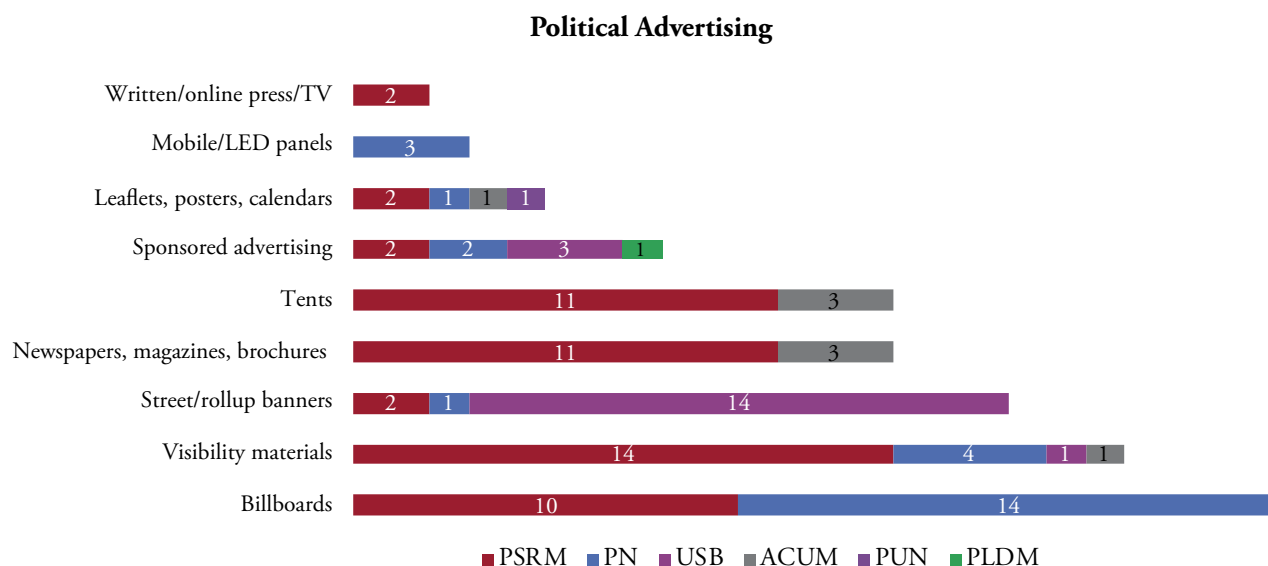
We reiterate the position of the Promo-LEX EOM according to which the prohibitions established in para. (8) can be interpreted in a very extensive manner, for which reason the legislator should establish provisions as clear as possible, which comply with the provisions governing the freedom of expression.

8.6. Street/promotional/online advertising

8.6.1. Use of electoral advertising in the context of general local elections prior to the legal deadline set for it

The Promo-LEX EOM identified at least 107 situations, in which street/promotional/online advertising was used prior to the legal deadline set for it (registration of candidates in the elections). Of these, 50% belonged to the PSRM, 23% – the PN, 17% – the USB and 7% – the ACUM electoral bloc (see chart no. 55). The most widely used types of advertising were billboards (22%), visibility materials (19%) and street banners (16%).

Chart no. 55



79. Report no. 4. The Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October 2019, p. 47. <https://bit.ly/2QVpmRW>

80. Report no. 2. The Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October 2019, p. 31. <http://bit.ly/35CPNQW>

81. Situations are described in the Reports no. 3, 4 and 6. The Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October 2019.

8.6.2. Use of political advertising during the election campaign

During the election campaign, the observers of the Promo-LEX EOM reported at least 4 668 situations, in which advertising was used to promote electoral candidates. The most active were: the PSRM (37%), the ACUM electoral bloc (17%), the PN (12) and the PPS (8%) (see table no. 3).

Table no. 3. Types of electoral advertising per each candidate

N/O	Type of advertising	PSRM	ACUM	PN	PPS	PDM	PUN	PLDM	PPR	PL	CRM	PPEM	USB	ICs	Other parties	Total
1	Leaflets, posters, calendars	222	244	122	91	80	60	36	20	20	23	13	11	58	23	1023
2	Street banners/roll up banners	234	149	40	114	42	33	24	15	16	4	4	13	85	12	785
3	Newspapers, magazines, brochures	371	111	139	63	64		3			13			2		766
4	Visibility materials	248	56	85	30	28	9	5	8	6	3	5		14	1	498
5	Billboards	212	27	77	50	17	12	5	7	3		5	3	42	7	467
6	Tents	237	94	55	28	1			5			5	1	2		428
7	Sponsored advertising	66	43	23		2	12	9	3	6		9	10	21	15	219
8	Video spots	45	34	6	1	34	3	14	3	1	1		2	11	8	163
9	Written / online press/ TV	24	17	5	2	47	3	11	3		9			26	3	150
10	Mobile / LED panel	55	11	7	4	14		9	2	7	1	6		5	4	125
11	Online banners	12	4	14		5	1	5		1				2		44
Total		1726	790	573	383	334	133	121	66	60	54	47	40	268	73	4668

8.6.3. Events that can be qualified as using electoral advertising in breach of legal provisions

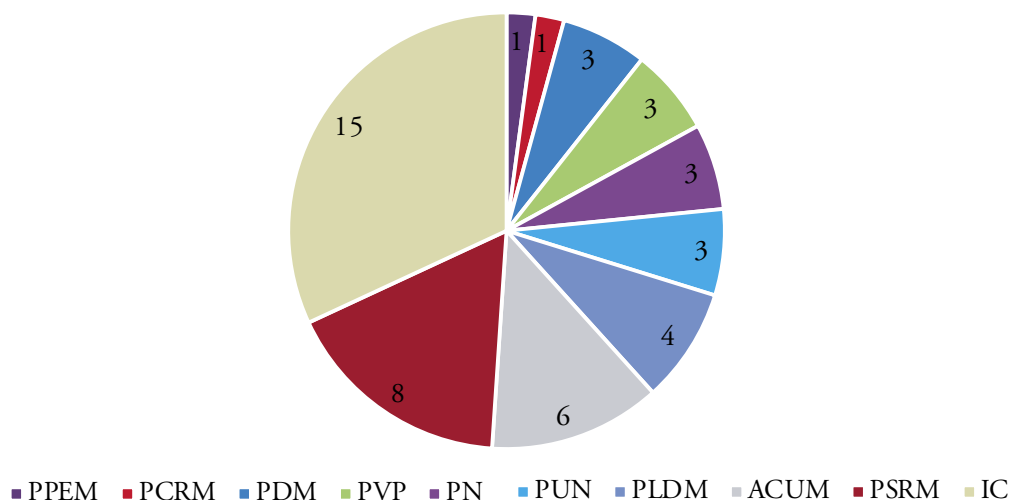
According to art. 70, para. (6) of the Electoral Code, the responsibility for the content of the electoral materials advertising, broadcast or published, is borne by the electoral competitor. Each advertising material must include the name of the electoral competitor, the date of printing, the circulation of the material and the name of the printing company. On the same lines, in accordance with the provisions of section 14 of the *Regulation on the placement of electoral advertising and political promotion materials on advertising panels*⁸², it is forbidden to place electoral displays in places other than those established by the legislation.

Based on the reports developed by the observers of the Promo-LEX EOM, there have been *identified 47 cases* when electoral displays were placed without meeting the requirements set for advertising materials (see chart no. 56). Most cases of non-compliance covered the ICs (15), the PSRM (8) and the ACUM electoral bloc (6).

82. CEC's Decision no. 3328 of 28.04.2015. <https://bit.ly/2W2zkkx>

Chart no. 56

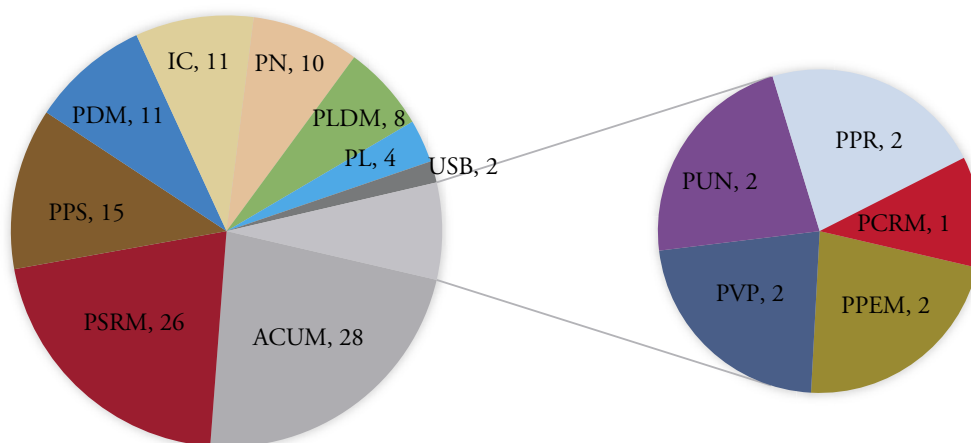
Electoral displays placed without meeting the requirements set for advertising materials



In the same context, we note that there were identified at least 124 cases of placing electoral advertising in unauthorized places (see chart no. 57). Most cases covered the ACUM electoral bloc (28), the PSRM (26) and the PPS (15).

Chart no. 57

Placing the electoral advertising in unauthorized places



8.7. Situations that can be qualified as use of violence in electoral campaign

According to the Promo-LEX observers' reports, there have been registered a minimum of *five cases* of intimidation/violence/vandalism involving electoral candidates. In three cases competitors were targeted as victims (2 – the ACUM electoral bloc, 1 – the PSRM)⁸³, and in two cases, they provoked intimidation (the ACUM electoral bloc and the PLDM)⁸⁴.

83. 2 billboards in case of the ACUM electoral bloc (Cojusna, Straseni) as well as the headquarters of the electoral staff were vandalized in Bolduresti, Nisporeni. Also one billboard was vandalized in case of the PSRM (Colonita, Chisinau).

84. The candidate of the ACUM electoral bloc running for mayor in Pepeni village, Singerei, assaulted the director of the kindergarten located in the aforementioned village, because she did not allow him to conduct a meeting with voters during working hours. The candidate of the PLDM running for mayor in Radulenii Vechi, Floresti, assaulted the accountant of the village hall – member of DEC, expressing his disagreement in relation to some payments made by her to a local councillor.

IX. FINANCING OF ELECTORAL CAMPAIGNS

9.1. Existing legal framework

9.1.1. Amendments on financing of electoral campaigns

On 15 August 2019 the Electoral Code was amended⁸⁵ and several improvements were made to the financing of electoral campaigns: the citizens of the Republic of Moldova were given the opportunity to make financial contributions outside the country, the limits on donations for an electoral campaign were reduced⁸⁶, the ceiling of donations made by nationals from outside the country⁸⁷, by citizens with status of a publicly appointed office-holder⁸⁸, with the status of civil servants, including with special status, and by employees from public organizations was differentiated⁸⁹.

At the same time, changes were made to the Law on political parties, decreasing the percentage share of the state budget allocations for political parties from 0.2% to 0.1% of state budget revenues, with the exception of special purpose revenues. The distribution of allowances was also modified by introducing a new criterion for allocating the public money - according to the results of the presidential elections.

The Promo-LEX EOM welcomes the amendments made therein, however, criticizes the establishment of new rules for financing the electoral campaign during the electoral process, especially since the CEC did not have enough time to adjust its field-specific normative acts. The evolution of the events showed that the fears mentioned by the Mission at the beginning of the election campaign regarding the ambiguities that arise as a result of the uneven and targeted application of the amendments were justified, for new parliamentary elections and general local elections. In addition to the emergence of key ambiguities, the adoption of amendments in the period immediately preceding the election campaign contravenes the relevant international standards.

9.1.2. Regulation of the financing of electoral campaign for the general local elections

Only the financial resources derived from salaried, entrepreneurial, scientific or creative activities, carried out by the citizens of the Republic of Moldova both inside and outside the Republic of Moldova can be used to finance electoral campaigns⁹⁰.

All the revenues and expenses of electoral candidates must be reflected in the bank accounts, specially opened after their registration, called accounts with the mention “Electoral fund”⁹¹. Candidates, who will not carry out campaign activities and thus incur no expenses, should inform the CEC about taking such a decision. Banks must inform the CEC (or DEC) on a daily basis about the transactions that take place through the accounts with the mention “Electoral fund”⁹².

85. Report no. 2. The Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October 2019, pages 10, 34-39. <http://bit.ly/35CPNOW>

86. Donation ceilings for natural and legal persons – to 41 850 lei (six average monthly salaries in Moldova and 83 700 lei, respectively, 12 average monthly salaries in Moldova). The fixed amount of an average monthly salary in Moldova for 2019 is 6 975 lei.

87. The limits of donations made by citizens of the Republic of Moldova out of incomes obtained outside the country – three average monthly salaries in Moldova (20 925 lei).

88. This fact reduces the risk of illicit arrangements through which external interests may be involved in financing the electoral campaigns.

89. This excludes the risk of abuse of coercive resources, on political criteria, on the donors on the part of persons employed with the government.

90. Art. 41, pra. (1) of the Electoral Code. <https://bit.ly/33q34Kk>

91. The bank, where accounts with the mention “Electoral fund” are opened, informs on a daily basis or at the request of the Central Electoral Commission about the financial means transferred to the account of electoral competitors.

92. Art. 41, para. (2), let. a), b), c) of the Electoral Code of the Republic of Moldova.

Electoral competitors representing political parties and electoral blocs are required to submit to the Central Electoral Commission, within three days of the opening of account with the mention “Electoral Fund” and, subsequently, once a week, a report on the money accrued on the account and the expenses incurred during the electoral campaign⁹³. The reports shall be published on the official website of the CEC within 48 hours⁹⁴. Electoral competitors, who have an independent candidate, must submit to the appropriate constituency council, within three days from the opening of the account with the mention “Electoral Fund” and, subsequently, every two weeks, reports on the accumulated revenues and expenses incurred in the electoral campaign. Within 48 hours of receiving the reports, electoral councils shall refer the reports for their subsequent publishing on the websites of the respective local authorities. The reports on the financing of electoral campaigns for the entire electoral period shall be submitted to the Central Electoral Commission by the registered electoral competitors at the latest, two days before the election day.

9.1.3. Regulation of the financing of electoral campaign for the new parliamentary elections

As for the new parliamentary elections, the rules for the financing of electoral campaign remained the ones stipulated in the old wording of Electoral Code⁹⁵. In this context, we find that art. 43, para. (7) is applied differently to both elections. Thus, in the case of the new parliamentary elections of 20 October 2019, political parties must submit to the CEC the initial report on the state of affairs in the party current account at the beginning of electoral period, as opposed to the local elections, where the parties have the obligation to present this report at the beginning of electoral campaign.

9.2. CEC’s Regulations

9.2.1. Regulating the finances of the electoral competitors for the general local elections

General ceiling of the means that can be transferred to the “Electoral Fund” account. According to the new legal provisions, in this case art. 41, para. (2), let. d) Electoral Code, the general ceiling of the means that can be transferred to the “Electoral Fund” account in the country constitutes 0.05% of the revenues provided by the law on the state budget for that year⁹⁶. On 3 September 2019, the CEC set the general ceiling of the financial means that can be transferred to the “Electoral Fund” account of the electoral competitor for the general local elections of 20 October 2019, amounting to 21,062,750 lei⁹⁷. At the same time, the CEC set the maximum ceiling for each single member constituency⁹⁸ by multiplying the coefficient established in the amount of 7.47 lei⁹⁹, by the number of voters in the respective constituency.

The Promo-LEX EOM notes in this poll the lowest level of the ceiling set by the CEC, compared to the last five polls at national level. Moreover, there is also attested the lowering of the ceiling by three times compared to the 2016 presidential elections and by four times compared to the 2019 parliamentary elections.

93. The report shall contain: a) identification data of the natural or legal person, who donated financial means; b) the list of all donations received, including the nature and value of each donation made in money, goods, objects, work or services; c) the total value of donations and the number of donors; d) the list of donations reimbursed as a result of exceeding the ceilings established in art. 41, para. (2), let. e) of the Electoral Code; e) identification data of the natural or legal person to whom financial means have been paid from the “Electoral Fund” account and the purpose of the respective expenses; f) amounts of debts, numbers of financial records and other conclusive information; g) accounting information of the legal persons founded or otherwise controlled by the respective political party for the corresponding period.

94. Article 43 of the Electoral Code of the Republic of Moldova. Reports on the financing of electoral campaigns. <https://bit.ly/2Jcsdy2>

95. Report no. 1. The Observation Mission for the general local elections and new parliamentary elections of 20 October 2019, pages 25-28. <https://bit.ly/2kdDGaw>

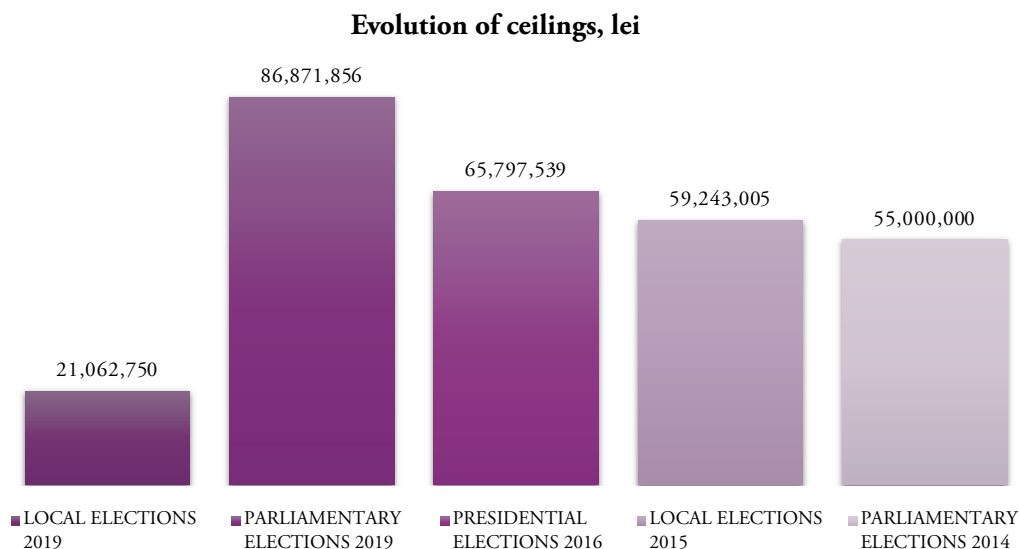
96. Based on the calculations made, 0.05% of 42 125 500,0 thousand lei is equal to 21 062 750 lei.

97. CEC Decision no. 2 640 on the establishment of the general ceiling of financial means that can be transferred to the account with the mention „Electoral fund” belonging to the candidate in the general local elections of 20 October 2019. <https://bit.ly/2lSCnhq>

98. Ibidem, Annex HCEC 2640.

99. The coefficient is calculated by dividing the general ceiling of the financial means by country (21 062 750 lei) by the total number of voters in the country (2 819 621 voters).

Chart no. 58



Data obtained based on the reports submitted with the CEC

Interest-free credit granted to electoral competitors. The CEC established the amount of interest-free credit granted to electoral competitors amounting to 50,000 lei for each political party and electoral bloc and 10,000 lei for each independent candidate. At the same time, the CEC established that the Ministry of Finance will elaborate and approve a Regulation on granting interest-free credits to electoral competitors in order to conduct electoral campaigns.

The Promo-LEX EOM notes the stagnation of the level of financing from the budget for the electoral competitors who need additional funding sources. During the monitoring period of the last national polls, it remained unchanged - 50,000 lei for parties and electoral blocs, 10,000 lei for independent candidates.

Electoral funds and treasurers. According to the data published on the official page of the CEC, the Promo-LEX EOM found that, out of 27 registered parties and electoral blocs only 23 have confirmed their treasurers to the CEC (the PSRM, the PPVP, the USB, the PPS, the MSPFN, the PSE, the PN, the PPEM, the PDM, the PPDA, the ACUM, the PLDM, the PVE, the PUN, the PPR, the PNL, the PL, the MPSN, the PCRM, the MPA, the PAD, the PPRM, the PLD). Additionally, according to the information published by the CEC, 22 political formations opened the “Electoral Fund” accounts, 20 political formations complied with the legal provision to submit the initial financial report, three days after opening the “Electoral Fund” accounts, as provided by art. 43, para. (1) of the Electoral Code, 23 competitors have nominated their treasurers (see Annex 14).

9.2.2. Regulating the finances of the electoral competitors for the new parliamentary elections

General ceiling of the means that can be transferred to the “Electoral Fund” account. On 20 August 2019, the CEC established the general ceiling of the financial means that can be transferred to the “Electoral Fund” account of the electoral competitor in the single member constituencies for the new parliamentary elections of 20 October 2019, amounting to 2,092,800 lei for each candidate within a single member constituency¹⁰⁰. Additionally, the CEC¹⁰¹ set the general ceiling of the financial means that can be transferred to the bank account with the mention “Intended for the initiative group / groups”, constituted to support candidates in the single member constituencies no. 17, no. 33, no. 48 and no. 50, in the amount of 69,750 lei for each IG¹⁰².

100. The basis for calculating the coefficient was the average monthly wages forecast for 2019 amounting to 6,975.0 lei, the coefficient size being 0.5% of the respective average wages, thus constituting 34.88 lei. The calculation basis for establishing the ceiling for single member constituencies is the coefficient established multiplied by 60,000 - the number of voters that served for the establishment of single member constituencies, according to art. 80, para. (4), let. a) of the Electoral Code.

101. CEC Decision no. 2578 on the establishment of the general ceiling of the financial means that can be transferred to the account with the mention “Intended for the initiative group / groups” in the new parliamentary elections of 20 October 2019. <https://bit.ly/2ZsRdte>.

102. The reporting basis for establishing the coefficient was the average monthly wages forecast for 2019 in the amount of 6,975.0 lei, approved by the Government Decision no. 21/2019, the coefficient size being 1% of the respective average wages, thus the coefficient constituting 69.75 lei.

9.3. Electoral competitors' financial reporting to the Central Electoral Commission

9.3.1. Financial reporting in the general local elections

23 political parties submitted reports on the financing of electoral campaign according to the data published on the official webpage of the CEC. One political party (the PSM) have submitted the request for non-payment of expenses late – at the end of the electoral campaign. Other three political parties registered in the elections did not submit any financial report to the CEC, nor any request for non-opening the “Electoral Fund” account. These were: the PRSM, the POM, the PPM (see Annex 14).

The Promo-LEX EOM reiterates that the reports published on the official webpage of the CEC are not in *open data*, format, as provided in the strategic plan of the CEC, but in a scanned pdf format, which make difficult not only the visual, but also the digital access to the data presented in the reports. The Promo-LEX EOM requests the CEC to amend the Regulation on the financing of electoral campaign by introducing the obligation to fill out the reports in Excel format and subsequently publish them on the official webpage of the CEC, so that the data could be used for analysis purposes by the associate experts, media and academic environment.

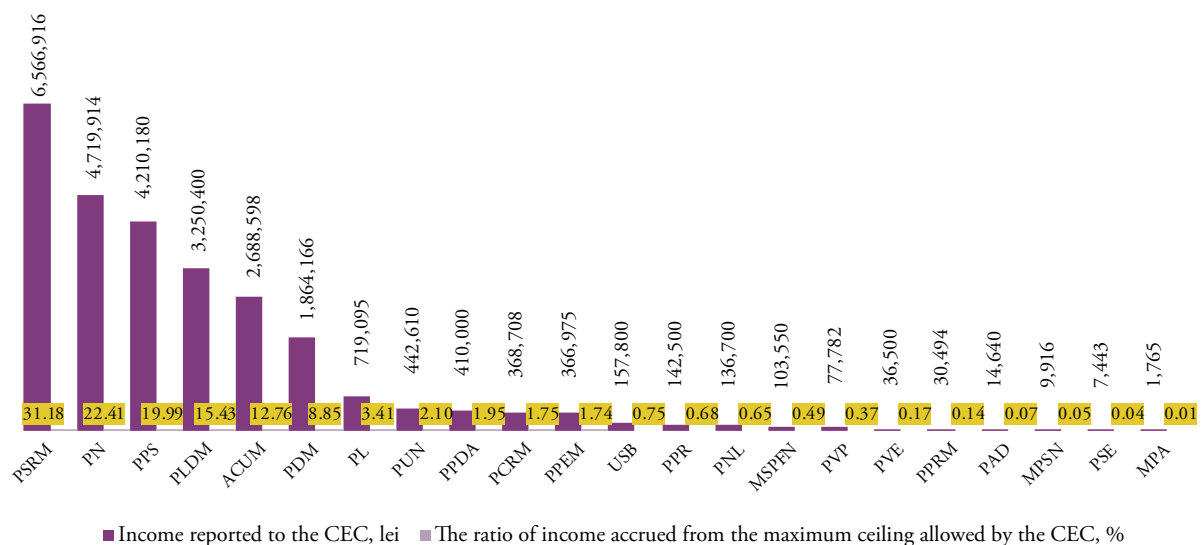
According to the data obtained by the Promo-LEX observers from the DEC's (I and II), as well as from those 1 364 ICs from the mayor's offices and level I and II local councils, 79 ICs (6%) have submitted financial reports with DEC's I and II, 274 ICs (20%) ICs have submitted requests for non-payment of expenses, while the other 1 011 ICs (74%) did not submit any financial reports nor requests, although the legal provisions stipulate for the obligation thereof.

9.3.2. Revenues and expenses of electoral competitors reflected in the reports on financing of electoral campaign for the general local elections

According to the reports presented to the CEC, the amount of revenues declared by the 22 competitors (parties and electoral blocs) registered for the entire duration of the electoral campaign (rounds I and II), is MDL 19 759 736 while the amount of expenses reported therein is MDL 19 726 281; the final balance being MDL 34 266. No independent candidate has exceeded the general ceiling¹⁰³ of the means that can be transferred to the “Electoral Fund” account. The PSRM had been the closest to it, reaching 31.18% of the aforementioned ceiling.

Chart no. 59

Income reported to the CEC, lei The ratio of income accrued from the maximum ceiling set, %



Date obținute pe baza rapoartelor depuse la CEC

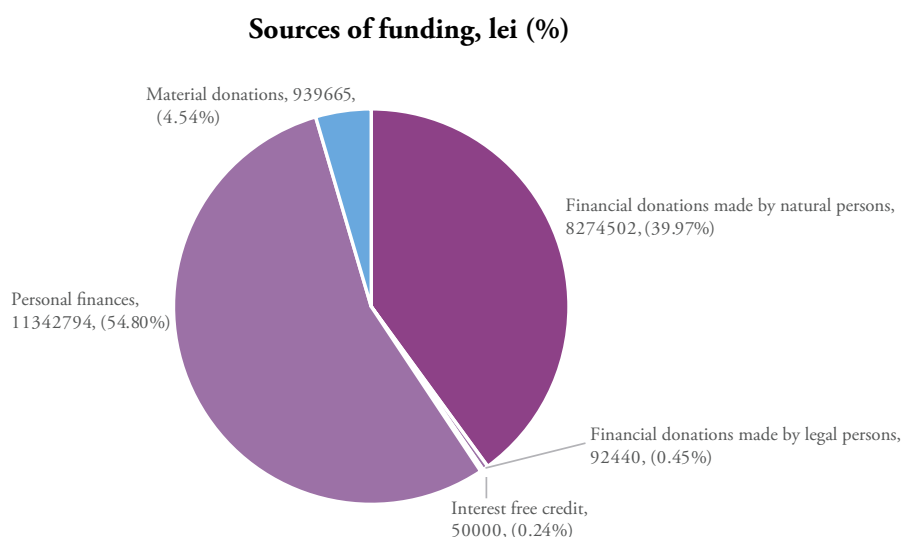
103. According to the new legal provisions, in this case art. 41, para. (2), let. d) Electoral Code, the general ceiling of the means that can be transferred to the “Electoral Fund” account in the country constitutes 0.05% of the revenues provided by the law on the state budget for that year. According to the calculations, 0.05% of 42,125,500.0 thousand lei constitutes 21,062,750 lei.

Sources of financing of electoral competitors consist of:

- financial donations made by 997 natural persons¹⁰⁴ amounting to MDL 8 274 502 (39.97%) for 22 competitors (the PPS, the PDM, the PLDM, the ACUM, the MSPFN, the PUN, the PN, the PVE, the PPVP, the MPSN, the PCRM, the PPDA, the PPEM, the MPA, the USB, the PAD, the PNL, the PPR, the PPRM, the PSE, the PLD, the PSRM);
- financial donations made by seven legal persons amounting to MDL 92 440 (0.45%) for two electoral competitors (the ACUM and the PPVP);
- own resources in the current account of 10 political parties (subsidies from the state budget) amounting to MDL 11 342 794 (54.80%) (the PDM, the PLDM, the PN, the PSRM, the PPS, the ACUM, the PVE, the PPVP, the PCRM, the PL);
- interest-free loan amounting to MDL 50 000 (0.24%) granted to one electoral competitor (the PNL);
- material donations totaling MDL 939 665 (4.54%) for seven political parties¹⁰⁵ (the ACUM, the PPS, the PN, the MSPFN, the MPSN, the PUN, the PPVP) (see chart no. 60 below).

The Promo-LEX EOM has repeatedly drawn attention to the absence of a mechanism for entering the value of all material donations to the balance of the financial report, in the section entitled *turnover of financial resources*, nevertheless the chart no. 60 below also shows the material donations that do not appear in the total amount of revenues of MDL 19 759 736.

Chart no. 60

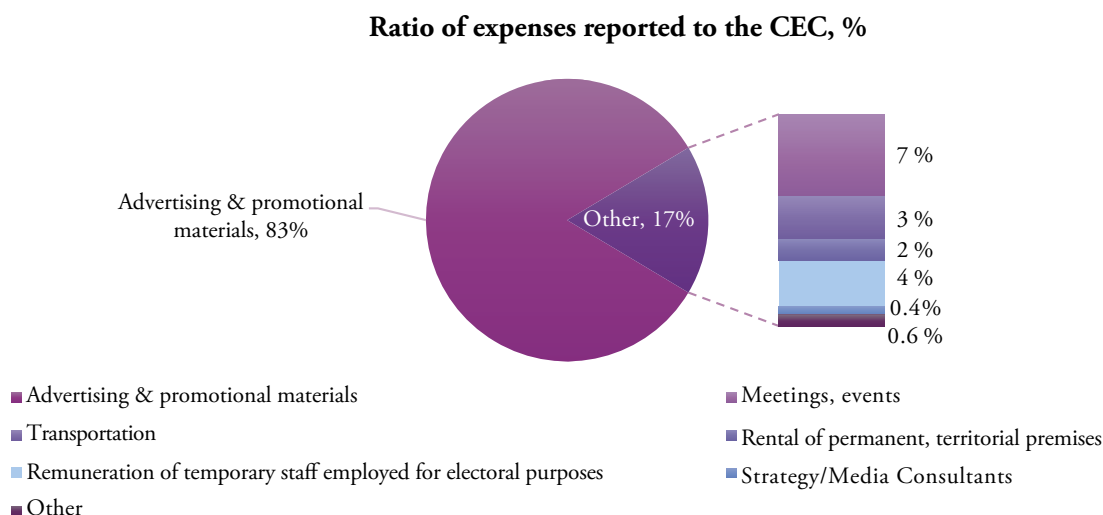


Data obtained based on the reports submitted with the CEC

As for the expenses reported to the CEC, the major share of expenses declared therein is comprised of the ones for advertising – 56% and those for promotional materials – 27%.

104. This amount includes four donations made by citizens from abroad, amounting to MDL 17 600 for the ACUM Bloc and the MSPFN.
 105. Material donations are not included in the balance sheet of the financial report, in the section entitled turnover of financial resources.

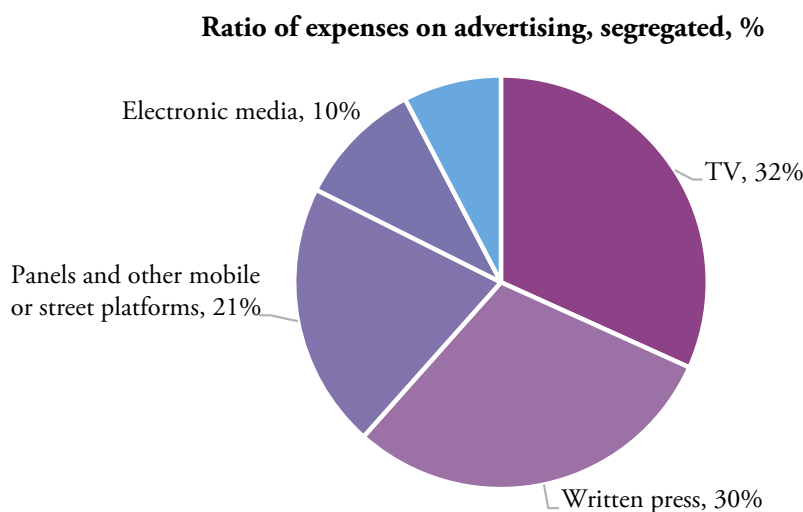
Chart no. 61



Data obtained based on the reports submitted with the CEC

As for *advertising expenditures* reported with the CEC, there is seen a balance in the purpose of expenditures incurred, those for TV and *written press* reaching a similar level. This raises doubts as to the full elucidation of expenditures. Moreover, the weight attached to the expenditures for street banners and electronic media, which, according to market estimates, cost much more than those for *the written press*, causes reasonable suspicions on the accuracy of the data reflected therein.

Chart no. 62



Data obtained based on the reports submitted with the CEC

9.3.3. Financial reporting in the context of the new parliamentary elections

The political parties¹⁰⁶ created nine IGs to collect signatures for the purpose of registration in the elections, while the other 13 groups have been created by citizens to nominate the independent candidates therein¹⁰⁷. Of these, only the IG of the PSRM have submitted two financial reports with the CEC showing “0” revenues and expenditures. The other eight political parties and four IGs acting on behalf of the independent candidates¹⁰⁸ have submitted with the CEC data on failure to open bank accounts for the respective IGs as well as on non-payment of expenses¹⁰⁹.

106. The PSRM, the PLDM, the PNL, the PVE, the PSE, the PPDA, the PLR, the PDM, the PUN.
 107. Emilia Ristic, Ion Angheluta, Oleg Brega, Lidia Grozav, Alexei Nicolae, Petru Ursu, Tudor Turta, Mihail Boicu, Ilie Rotaru, Carolina Panico, Ion Dron, Vasile Calmatui, Valentin Haraz.
 108. Carolina Panico, Mihail Boicu, Ilie Rotaru, Lidia Grozav.
 109. Both reports and requests belonging to political parties were published on the official webpage of the CEC. <https://bit.ly/2kZjtFt>

Subsequently, nine political parties registered as electoral competitors have submitted their financial reports with the CEC. Only three ICs (Ion Dron, Alexei Nicolae and Teodor Turta) have submitted their financial reports, whilst the other two ICs (Lidia Grozav and Carolina Panico) notified the CEC that they will not incur any expenditures. The other eight independent candidates did not submit any documents.

The total volume of revenue obtained and expenditures incurred by nine electoral candidates and three ICs is MDL 625 949. The IGs reported “0” revenues and expenditures as for the collection of signatures.

9.4. Expenditures of electoral competitors in the general local elections found by Promo-LEX observers and not reflected in the financial reports¹¹⁰

a) Expenditures incurred in connection with electoral meetings and events

During the election campaign, 16 candidates (the PSRM, the PPS, the ACUM, the PDM, the PN, the PCRM, the PL, the PLDM, the PUN, the PPRM, the USB, the MSPFN, the PPR, the MPA, the MPSN, the PPEM) conducted at least 783 electoral meetings, 110 door to door activities, 86 press conferences, 69 concerts and festivities, 21 sanitation events, seven charity related activities, five sporting events, two car marches and three protest meetings. See Annex 11 for details.

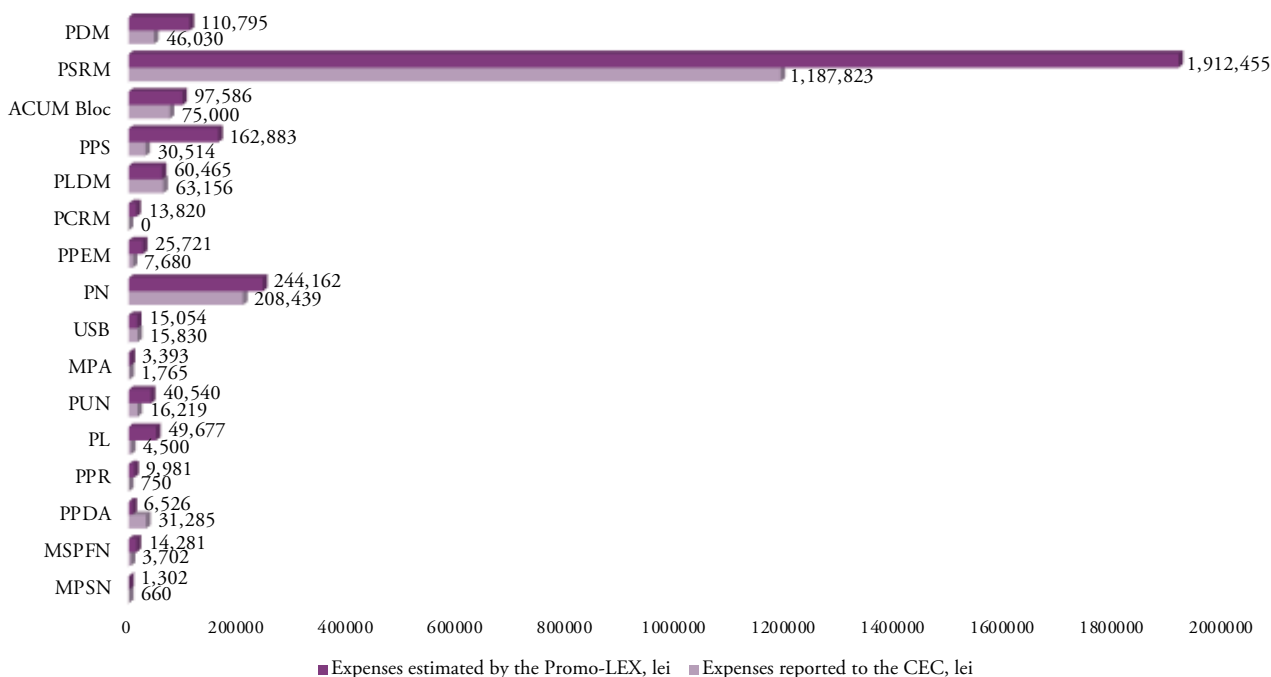
According to the findings of the Promo-LEX EOM, 13 electoral candidates (the PSRM, the PPS, the PN, the PPEM, the PCRM, the PDM, the ACUM Bloc, the MPSN, the MSPFN, the PPR, the PL, the PUN, the MPA) have reported expenditures lower than estimates indicated by the Promo-LEX, total unreported estimates amounting to MDL 1 103 514. Please see Annex 13 for details on the expenditures reported with the CEC and estimated by the Promo-LEX Association in each electoral constituency for certain candidates.



Electoral concert of PSRM, Bălți city, source: <https://www.facebook.com/greceanii>

110. The calculation methodology used to estimate the expenses of the electoral competitors found by Promo-LEX observers and not reflected in the financial reports is presented in Annex 15.

Expenses on public events and demonstrations, lei

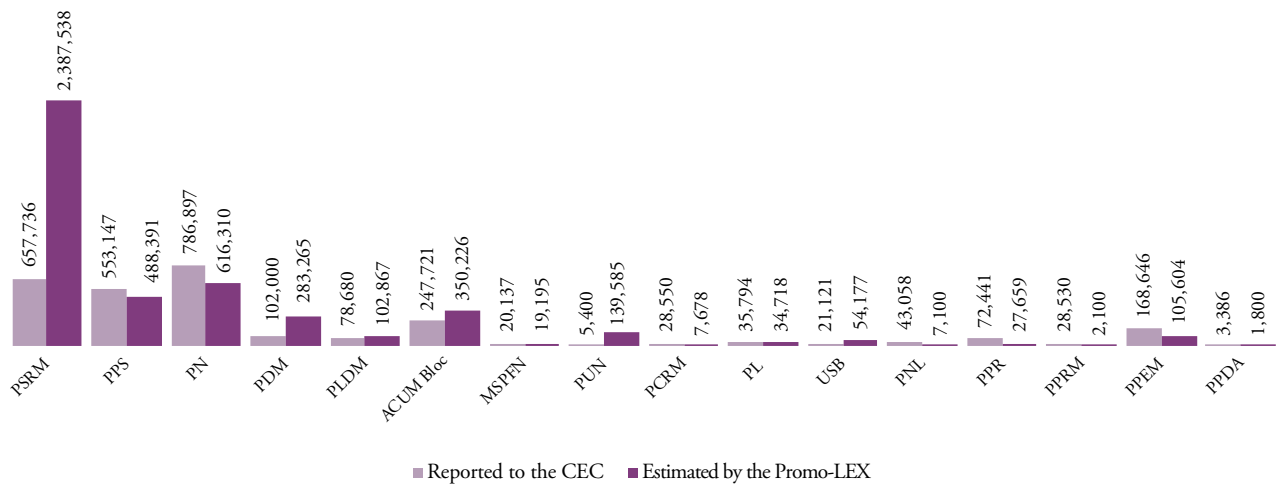
Press conference, MSPFN, source: www.privesc.eu

b) Advertising expenses

Expenditures for street and mobile advertising. According to the findings of the Promo-LEX EOM, at least six candidates out of 16 (the PSRM, the PDM, the PLDM, the ACUM electoral bloc, the PUN, the USB) incurred expenses for street banners lower than our estimates. According to Promo-LEX, the aforementioned six candidates failed to report at least MDL 2 205 000.

Chart no. 64

Expenses on street panels, lei

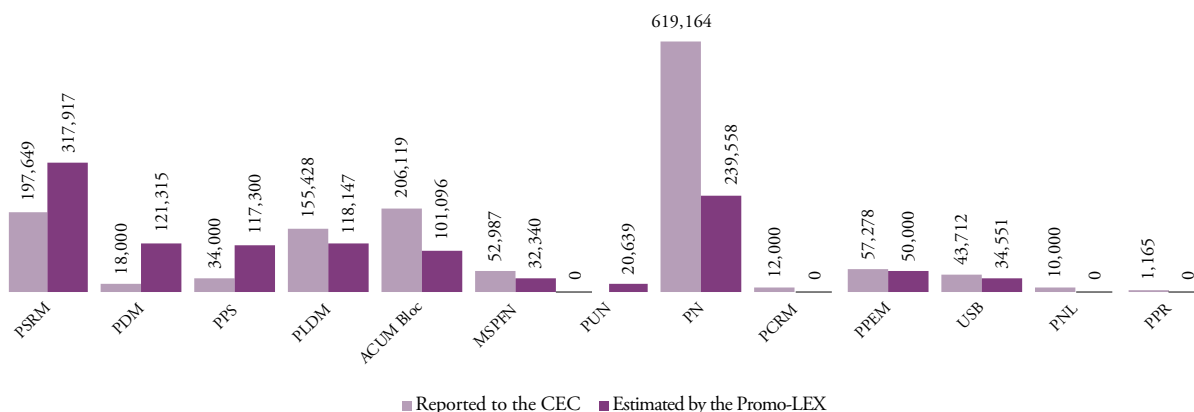


PPS street banner, source: observator Promo-LEX

Expenditures for online advertising The Promo-LEX EOM found cases of online advertising also in the electronic media – webpages belonging to candidates, sponsored pages and messages on Facebook, online banners on multiple portals, video spots in the case of 13 electoral candidates (the PSRM, the PDM, the PPS, the PLDM, the ACUM electoral bloc, the MSPFN, the PUN, the PN, the PCRM, the PPEM, the USB, the PNL, the PPR). Four candidates (the PSRM, the PDM, the PPS, the PUN) indicated expenses in this category, which, however, are lower than the estimates of Promo-LEX. Expenses estimated as unreported amount to at least MDL 327 521.

Chart no. 65

Expenses on electronic media, lei



Expenses for promotional and print in media advertising. According to the findings of the Promo-LEX EOM, at least 25 electoral candidates incurred expenses for promotional and print in media advertising. However, in the case of 11 competitors, we found complete non-reporting of the expenses amounting to MDL 660 037.



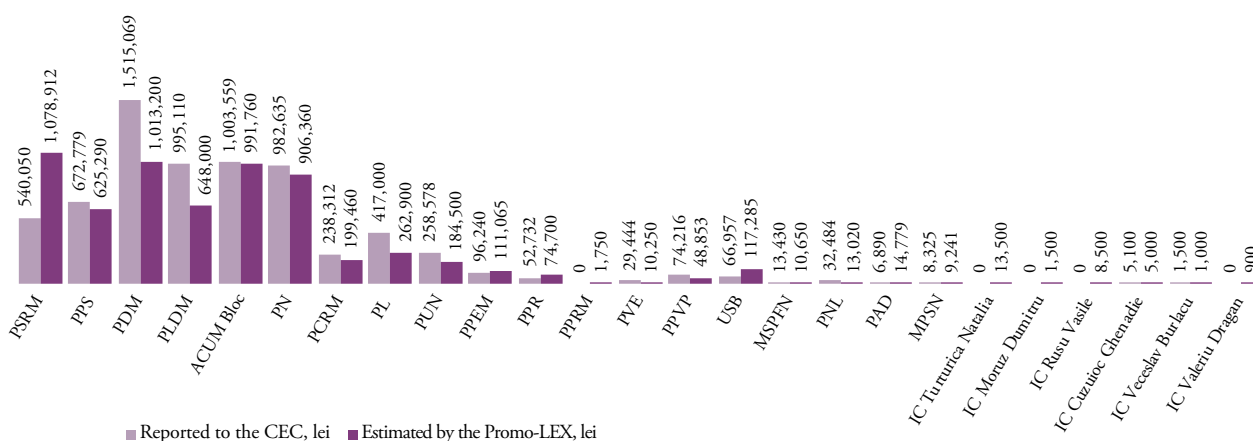
PLDM online banner,
source: www.unimedia.md



Sponsored facebook post ACUM Bloc,
source: <https://www.facebook.com/AndreiNastase.DA/>

Graficul nr. 66

Expenses on polygraphic and promotional advertising, lei





Campaigning PN,
 source: <https://www.facebook.com/partidulnostru1/>

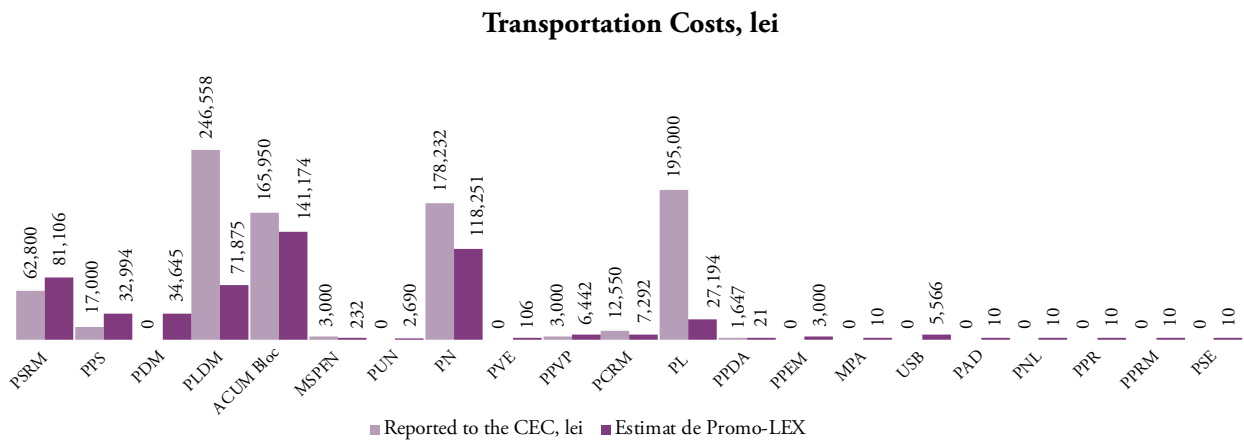


Tent of the ACUM Bloc,
 source: observator Promo-LEX

c) Expenses for the transportation of people and goods

Promo-LEX observers have reported the use of cars on the territory of the Republic of Moldova for electoral purposes by at least 19 electoral candidates. Only seven of them indicated such expenses in the reports submitted to the CEC. Of the 21 electoral competitors, one competitor (the PDM) reported to the CEC “less” expenses compared with the estimates therein, while other 11 competitors reported to the CEC “0” expenses in this regard. The estimates of the Promo-LEX EOM show that 14 candidates (the PSRM, the PPS, the PDM, the PUN, the PVE, the PPVP, the PPEM, the MPA, the USB, the PAD, the PNL, the PPR, the PPRM, the PSE) failed to report an amount of at least MDL 63 877.

Chart no. 67



PN car march, source: <https://www.facebook.com/RU1.m/>

d) Rental costs and/or maintenance costs (headquarters)

According to the Promo-LEX findings, 15 political parties rented at least 196 headquarters: the PPS – at least 40 headquarters; the PSRM – 34; the PDM – 32; the ACUM – 33; the PN – 15; the PCRM – 13; the PL – 11; the PLDM – 10; the PUN – 2; the PNL, the PPEM, the PPM, the PPVP, the PPDA, the POM – one headquarter each.

We found that seven electoral candidates have showed such maintenance costs and/or rental ones in their campaign reports, but not all of them correspond to the estimates made by the OM. A minimum amount of MDL 1 252 454 was estimated in relation to 196 headquarters rented by 15 candidates and identified by the Promo-LEX observers during the election campaign, while, at the same time, an amount of MDL 445 809 has been reported to the CEC by seven candidates.

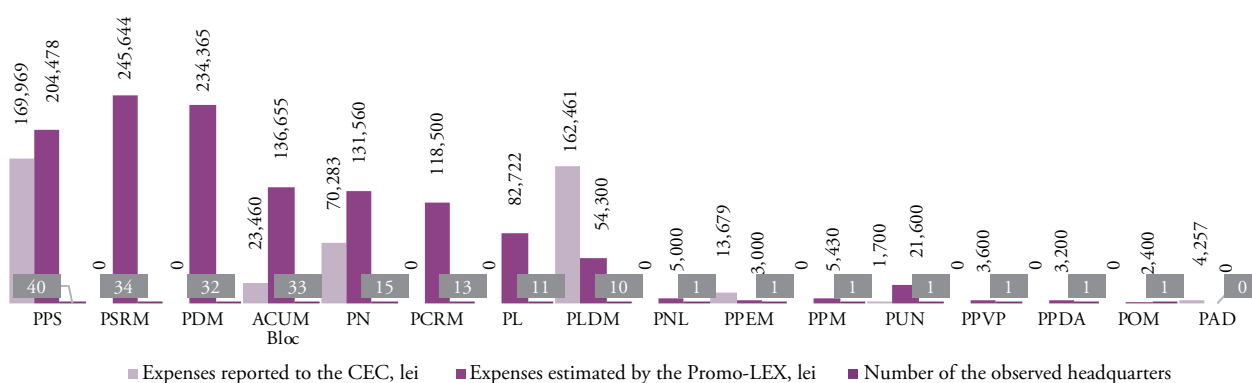


PUN headquarters, source: observator Promo-LEX

Following the correlation of the data estimated with the ones reported therein, per each party, we have found that all political parties have reported less than estimated by the Promo-LEX, attaining cumulatively an undeclared total amount of at least MDL 929 742.

Chart no. 68

Rental costs and/or maintenance costs (headquarters), lei



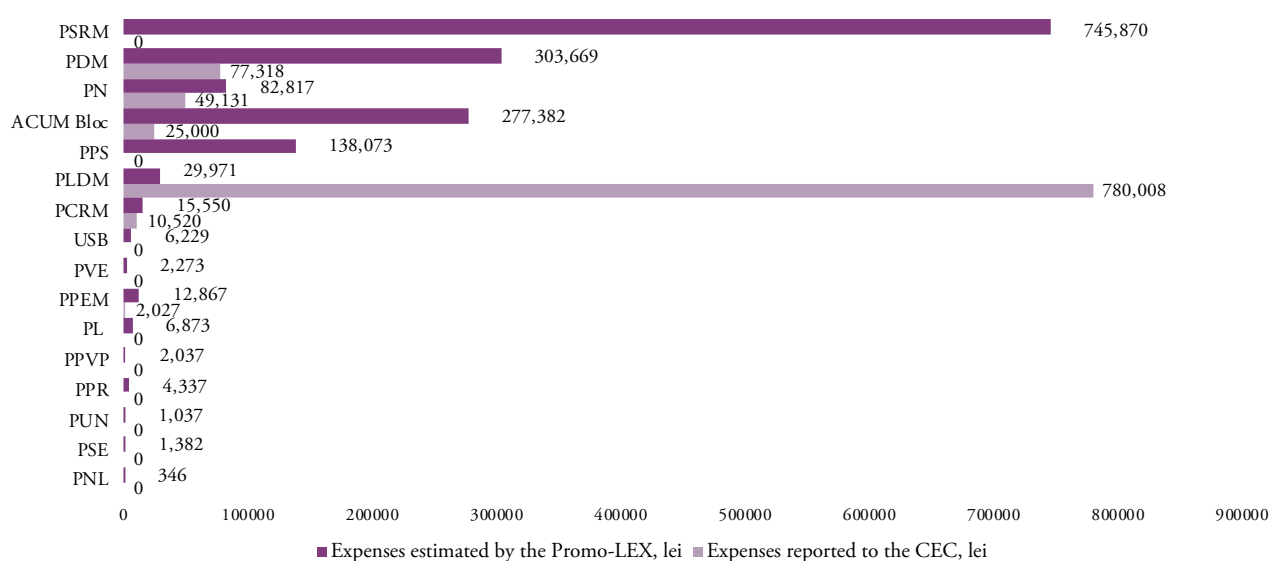
e) Expenditures incurred for delegating or posting of persons (including the rewards/daily allowances for observers and volunteers)

According to Promo-LEX observers, for the entire duration of the period for election campaign, 12 candidates delegated at least 7 256 volunteers/agitators, for the day of elections in the first and second rounds – 16 candidates delegated 4 000 observers and 1 080 representatives with the right to consultative vote. Only five electoral candidates declared such expenses, but only those declared by one candidate have fallen within the estimated ones (the PLDM). The total estimated and unreported amount is at least of MDL 1 432 754 (see chart no. 69 below).

Thus, according to the observers, the PSRM delegated at least 4 556 volunteers/agitators for the election campaign, 642 observers and 198 representatives with the right to consultative vote for the day of the elections; the PDM – 483 volunteers/agitators for the election campaign, 575 observers and 164 representatives; the ACUM Bloc – 697 volunteers/agitators, 502 observers and 99 representatives; the PPS – 776 volunteers/agitators, 131 observers and 44 representatives; the PLDM – 44 volunteers/agitators, 62 observers and 12 representatives; the PCRM – 27 observers and 18 representatives; the PPEM – 25 volunteers, 25 observers and five representatives; the PN – 569 volunteers/agitators, 16 observers and 59 representatives; the USB – seven volunteers, seven observers and nine representatives; the PL – 48 volunteers/agitators, three observers and three representatives; the PPR – 33 volunteers/agitators, two observers and one representative; the PVE – two volunteers, one observer and five representatives; the PPVP – 10 volunteers/agitators and three representatives; the PUN – three representatives; the PSE – four observers; the PNL – one representative with the right to consultative vote.

Chart no. 69

Expenses incurred for delegating the observers and representatives entitled to consultative vote, lei



The Promo-LEX EOM notes that 26 electoral competitors have omitted to fully reflect their expenses incurred in the election campaign. These were as follows: the PSRM, the PDM, the ACUM bloc, the PPS, the PUN, the PCRM, the PL, the PN, the USB, the PPEM, the PPR, the IC Natalia Turturica, the IC Rusu Vasile, the PPVP, the IC Dandis Nicolae, the PNL, the IC Nicolae Balaur, the PPM, the PPDA, the POM, the IC Moruz Dumitru, the PVE, the PAD, the IC Valeriu Dragan, the PSE, the MPA. The total unreported amount is estimated at least for MDL 6 104 594.

Further, the mission warns that the level of estimated expenditures (6 104 594 lei) compared to the level of those officially declared to the CEC (19 726 281 lei) reaches 31%, this being the highest share compared to the previous elections. Thus, in the general local elections 2019, we have witnessed the lowest level of transparency in the financing of the electoral campaign for the last five years. (Annex 13.1)



PSRM Electoral agitation, source: observator Promo-LEX

Chart no. 70

Total estimated expenses as unreported, lei



X. HATE AND DISCRIMINATORY SPEECH

10.1. Methodological landmarks

In the context of the general local elections and new parliamentary elections of 20 October 2019, the Promo-LEX EOM continued to monitor hate speech and incitement to discrimination. The monitoring also targeted other forms of public expression of intolerance, such as racist, sexist, anti-Semitic or homophobic discourse, public expressions that incite violence or aggression, defamation and denigration, or promotion of messages of superiority or inferiority of a group or persons belonging to these groups¹¹¹.

The observations were made on the basis of the methodology¹¹² specifically developed to monitor hate speech and incitement to discrimination in the public space and the media of the Republic of Moldova: online media, TV, social networking, public events, public statements made by competitors or by public figures about candidates.

10.2. Candidates who have resorted to hate speech and messages inciting discrimination

According to the data collected by our monitors, there have been reported at least 26 cases, in which electoral competitors generated messages inciting hatred and discrimination. Having analyzed the situation in terms of its source, the Promo-LEX EOM deduced that competitors who generated hate speech or other forms of intolerance in public space are: the PL – 10 cases; the PN – 10, the ACUM Bloc – 3; the PLDM – 1; the PPDA – 1 and the USB – 1.

10.3. Candidates targeted in messages that incite hatred or discrimination

According to Promo-LEX, there are 11 cases, where candidates were directly targeted by hate speech delivered by public figures or other competitors. The statistics per competitor is as follows: the PSRM – 4 cases; the ACUM Bloc – 2; the PL – 2; the PN – 1; the PPS – 1; IC – 1.

On the whole, having analyzed the messages uttered by competitors or addressed to them in terms of types of hate speech¹¹³, we notice that *the largest number of cases – 13 (31%) of the total of 42 cases identified therein are – sexist prejudices exploited and perpetuated by gender stereotypes in the society*. As a rule, in this way, prejudices against women in politics are promoted. It is followed by *prejudices towards individuals with mental illness – 12 cases (30%)*. These refer to the invocation of the categories of mad people, idiots, etc. Other elements of hate speech include: incitement to violence – 5; prejudices based on ethnicity – 4; denigration and dehumanization – 4, intolerance towards LGBT people – 3; prejudices related to religious beliefs – 1.

111. For the analysis and interpretation of the data, the broad approach of the concept of hate speech has been adopted, which is provided by international mechanisms for the protection of human rights, especially the approach of the UN Special Rapporteur on minority issues, according to which three types of expressions of hate speech shall be distinguished: *expressions that represent violations of international law and must be penalized by criminal law; expressions that are not punishable by criminal law, but which may be subject to justified restrictions or judicial review in civil matters; expressions that cannot be penalized under either criminal law or civil law, but which raise concerns about tolerance, dignity and respect for others*.

112. Report no. 1 of the Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October 2019, pages 29-30. <http://bit.ly/2kpYRpL>

113. A case of using hate speech may include several types of discriminatory messages.

XI. INFORMATION AND CIVIC EDUCATION

11.1. Voter education and apolitical information campaigns carried out by Promo-LEX

In the context of the general local elections of 20 October 2019, the Promo-LEX Association carried out the campaign „**I vote for ...**”. aimed at information, electoral education and apolitical mobilization of the citizens of the Republic of Moldova holding voting rights. The overall aim of the Campaign was to increase the participation of Moldovan citizens in the general local elections of 20 October 2019. The campaign covered the period between September – November 2019 and included several activities aimed at information of citizens, both in the first round¹¹⁴, and second round of elections¹¹⁵.

“Door-to-door” information activities have been carried out in 78 localities by a team of 34 Local Campaign Coordinators and 170 volunteers. Altogether, 36 593 citizens holding voting rights were informed about the election day, voting procedures and the importance of an informed and conscious vote.

Promo-LEX also organized nine electoral public debates with the participation of candidates running for mayor. Of 59 candidates enrolled in the electoral race, only 35 participated in the debates on behalf of 12 political parties, one electoral bloc and one independent candidate. 645 voters attended the debates organized therein. The debates were broadcast live by the www.privesc.eu portal and are available on the Promo-LEX website.

In partnership with Moldova 1 Public TV Station and Radio Moldova, Promo-LEX organized 27 TV and radio electoral debates with the participation of candidates running for mayor in Chisinau, Cahul, Comrat and Balti municipalities. Also, two thematic debates were organized with the participation of the CEC, the CICDE, Promo-LEX and the CCALC representatives.

Two non-political video clips aimed at voter information and raising voter awareness have been made and distributed. The video clips were broadcast on social networks and on seven TV stations with national and regional coverage.

Also, in the context of the election campaign for the new parliamentary elections of 20 October 2019, between 30 September – 18 October, the Promo-LEX Association, in partnership with Moldova 1 Public TV Station and Radio Moldova, organized 17 TV and radio debates with the participation of candidates running for MPs in the SMCs no. 17, no. 33, no. 48 and no. 50.

Furthermore, the Promo-LEX EOM managed the <http://instruire.monitor.md/>, online platform, available in the Romanian, Russian and English Languages. Promoting the online training and information platform on the observation methodology developed by Promo-LEX aims to provide useful information to citizens wishing to be involved as an observer in monitoring the electoral processes, both on the part of public associations, and electoral competitors. In this way, we want to provide self-training support for strengthening the culture of electoral observation in the Republic of Moldova. In addition, the platform is used to inform voters and increase the level of awareness by citizens of the legal regulations regarding the conduct of elections.

114. Report no. 4. The Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October 2019, p. 65. <https://bit.ly/2QVpmRW>

115. Report no. 6. The Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October 2019, p. 34. <https://bit.ly/2KYeL4V>

11.2. Education, information and training activities organized by the CEC and CICDE

Civic Education Campaigns launched by the CEC and CICDE. The Call Center for general local elections and new parliamentary elections was launched, which ran until 5th November 2019 and was open to voters and election officials alike.

On the 3rd of October 2019, CEC and CICDE launched the voter education and information campaign via mobile teams “I choose to vote! Indifference DOES NOT bring any changes”. The campaign also included a series of video spots, which were broadcast both online and on TV.

The organization of the “Equal access to the polling stations to everyone” campaign was aimed at increasing the degree of electoral inclusion for people with disabilities and included: presenting the results of the PSs audit carried out by the INFONET Alliance; conducting a workshop to inform the hearing-impaired persons about the specific nature of local elections; in addition a videographic on the process of elaborating, printing and using the ballot was developed and played in sign language, etc.

Events aimed at informing the young people about the elections were held therein: e.g. the *VotART* creative workshop in the electoral field, in which about 30 young people created motivational posters for elections; CICDE has re-launched the activities with young voters by involving the institution of youth councils in 13 districts following the model developed by CICDE.

Training of electoral officials organized and carried out by the CICDE in collaboration with the CEC. During the whole electoral period, both CEC and CICDE have organized a series of trainings for the electoral officials and the persons directly involved in the electoral process.

Thus, DEC II, DEC I and PEB members, including the members of voting stations opened abroad, persons responsible for the voters’ lists in the mayor’s offices, accountants within DEC’s, operators responsible for the insertion of the information on voter participation in the SAIS “ELECTIONS” received appropriate training.

Both CEC and CICDE also provided trainings for other categories of participants in the electoral process such as: the treasurers of the electoral competitors, representatives entitled to consultative vote, observers acting on behalf of electoral competitors, representatives of civil society and police employees. The training thereof covered the changes made to the electoral legislation, the competences of the police employees in the polling stations and the criminal and contraventional responsibility for the failure to comply with the electoral legislation.

On the same lines, in partnership with the National Institute of Justice, CICDE organized a seminar with a view to familiarising the judges with the legal framework, judicial practice and best practices in resolving election disputes.

As for distance self-training, CICDE has developed an online platform¹¹⁶ to provide trainings in the electoral field, where both DEC and PEB members had the opportunity to pass distance tests on electoral procedures. In the context of organizing and conducting the second round of elections, the electoral officials within the PEBs were enabled to attend online courses especially developed for PEB members by accessing the e-learning page of the CICDE.

116. <http://e-learning.cicde.md/toate-cursurile/>

XII. ELECTION DAY

12.1. Opening and closing of polling stations

On 20 October 2019, the static observers of Promo-LEX have monitored the general local elections and new parliamentary elections in 794 PSs¹¹⁷. The monitored polling stations, with one exception at opening¹¹⁸, as a matter of principle, opened and closed regularly. In the second round of local elections of 3 November 2019 the static observers of Promo-LEX have monitored the elections conducted in 307 PSs established in the electoral constituency of Chisinau. All PSs opened and closed regularly, the time deviations reported therein being insignificant in duration. The electoral process in both rounds of elections has been observed by 41, respectively 39 mobile teams of observers.

The accessibility of PSs for voters with locomotor impairments remains an unresolved issue. Securing the PSs' heat supply has been deficient, in particular in PSs located outside Chisinau municipality.

Table no. 4. Accessibility features of polling stations

Category	YES		NO		Total number of PSs	
	Round I	Round II	Round I	Round II	Round I	Round II
Is the polling station accessible to people with locomotor difficulties?	453 (57%)	183 (60%)	338 (43%)	124 (40%)	791	307
Is the polling station ensured with heating?	191 (24%)	177 (58%)	600 (76%)	130 (42%)	791	307
Is the polling station illuminated enough to carry out electoral procedures?	772 (98%)	303 (99%)	14 (2%)	4 (1%)	786	307

As for closing procedures, we repeatedly draw the attention of the reader to the fact that certain PEBs failed to comply with the regulatory requirement under which only a single PEB member shall submit the ballots to all participants in the vote counting process.

Table no. 5. Procedures for closing the PSs and counting of votes

Category	YES		NO		Total number of PSs	
	Round I	Round II	Round I	Round II	Round I	Round II
Did the polling station close at 9 pm?	786 (99%)	306 (99.7%)	5 (1%)	1 ¹¹⁹ (0.3%)	791	307
Were special forms for vote counting results initially drafted?	775 (99%)	305 (99.4%)	11 (1%)	2 (0.6%)	786	307
Did only one PEB member show the ballots to all participants in the vote counting process?	581 (74%)	226 (73%)	205 (26%)	81 (27%)	786	307
Did the video camera record the entire process of unsealing the ballot boxes and counting the ballots, without interruptions?	748 (95%)	304 (99.4%)	38 (5%)	3 (0.6%)	786	307

117. The number of findings per subject may differ depending on the number of validated SMSs received by the central team.

118. According to observers, the PS 1/148 in Chisinau has opened with a 45-minute delay.

119. The delay was insignificant.

12.2. Incidents found on election day¹²⁰

The final processing of information reported by the Promo-LEX observers, for both rounds of elections resulted in the analysis of 563 incidents, of which 405 were found in the first round, while the other 158 in the second round of elections. For comparison purposes, in the parliamentary elections of 24 February 2019 the number of incidents found on election day (only one round of elections) was 1 118¹²¹ (see Annex 16).

Table no. 6. Incidents reported by Promo-LEX observers on the election day (rounds I and II)

No.	Type of incident	Round I	Round II
1	Obstruction in obtaining copies of vote counting minutes	9	0
2	Restricted access or obstruction of the free observation process in PS	9	2
3	Ballot boxes have not been sealed according to the legal procedures	11	18
4	Presence of advertising materials, posters, electoral displays within the precinct (100 m from the PS)	38	21
5	Unjustified group voting (there are 2 or more people in the voting booth)	25	2
6	Unjustified presence of unauthorized persons in the PS and/or within 100 m of the PS	46	25
7	Ballot papers unused by PEB members are not kept in a secure place	2	0
8	Rumors, attempts or even cases of material or monetary rewards offered to voters in the polling station and/or near it	8	8
9	Electoral campaigning or adverse campaigning in the polling station	25	6
10	Organized transportation of voters	13	13
11	Unjustified cessation/suspension of the voting process in the polling station	3	1
12	Violence or intimidation of voters or other people	16	2
13	Deficiencies in the operation of the SAIS "Elections"	23	20
14	Deficiencies in voters' lists	61	8
15	Photographing of ballot papers, other violations of the secret of voting	26	9
16	Damaged ballot papers or other incidents related to their misuse	16	2
17	Discontinuation of the shooting of the voting and vote counting processes, other incidents related to filming of voting procedures	34	7
18	Cancellation of ballots before closing the polling station	6	1
19	Other	34	13
TOTAL		405	158

The Promo-LEX EOM draws attention to the fact that in at least 18 cases, the Mission's observers were restricted to observe freely the electoral procedures, as well as receiving the minutes on vote counting and totalizing of voting results.

In this poll the police representatives requested the Promo-LEX observers to provide them with evidence on the observations reported therein. We express our openness towards the collaboration with the law enforcement agencies, but we challenge their actions, inappropriate sometimes, which were manifested against the Promo-LEX STOs on election day.

120. A detailed description of the incidents is provided in the Report no. 5 and Report no. 6 of the Promo-LEX Election Observation Mission for general local elections and new parliamentary elections of 20 October (3 November) 2019. <http://bit.ly/372ZAAH>; <http://bit.ly/2KjCCvx>.
121. Final Report. The Promo-LEX Election Observation Mission for parliamentary elections of 24 February 2019, p. 77. <http://bit.ly/2JEmk0k>

In quantitative terms, the most frequently reported incidents were: unjustified presence of unauthorized persons in the PS or within 100 m from it (71), deficiencies in voters' lists (69) and presence of advertising materials, posters, electoral displays within the precinct (100 m from the PS) (59). The Promo-LEX EOM additionally warns against cases of electoral agitation on the election day – 31 – as well as rumours/ material rewards offered to voters – 16 cases.

12.3. Final results of vote counting

The results of parallel vote counting performed by the Promo-LEX EOM in the elections for the post of mayor of Chisinau, Balti and Comrat show insignificant differences compared to those presented by the CEC, which does not influence the final positioning of the competitors¹²².

Also, the Promo-LEX EOM analyzed the correctness of completing 755 protocols on vote counting results for the post of mayor in the first round of elections and 307 in the second one. From a comparative perspective, the Promo-LEX EOM points out that the share of erroneous protocols completed by the PEBs has decreased compared to the parliamentary elections of 24 February 2019.

Table no. 7. Dynamics of erroneous completion of protocols

Election Type	Number of protocols with errors (identified based on verification formulas)
Presidential Elections, 30.10.2016	31 (1.6%) ¹²³
New Local Elections, 20.05.2018	22 (5.87%) ¹²⁴ / 6 (2%) ¹²⁵
Parliamentary Elections, 24.02.2019	142 (6.8%) ¹²⁶ / 160 (7.6%) ¹²⁷
General Local Elections, 20.10.2019	24 (3.2%) ¹²⁸ / 6 (2%) ¹²⁹

In the context of the first round of elections, the Mission identified 24 protocols containing 52 errors, detected based on verification formulas, while in the second one, the Mission identified six protocols containing 14 errors, detected based on verification formulas.

Table no. 8. Type and number of errors detected

Error Type	Errors in round I	Errors in round II
D = F+H	8	3
E = C-D	3	1
I = C+J	8	3
H = G1+G2+G3+G4+Gn	15	1
F = D-H	8	3
J = I-C	8	3
C >= D	2	0

122. A detailed description of the circumstances is provided in the Reports no. 5 and no. 7 of the Promo-LEX Election Observation Mission for the general local elections and new parliamentary elections of 20 October (3 November) 2019. <http://bit.ly/372ZAAH>; <http://bit.ly/2KjCCvx>.

123. Data are provided for the second round of elections, total number of processed protocols – 1 981.

124. Round I of the new local elections of 20 May 2018, total number of processed protocols – 375.

125. Round II of new local elections of 20 May 2018, total number of processed protocols – 306.

126. National constituency.

127. Uninominal constituency.

128. Round I of general local elections of 20 October 2019, total number of processed protocols – 755.

129. Round II of general local elections of 20 October (3 November) 2019, total number of processed protocols – 307.

Depending on *the ratio of ballots declared invalid* at the time of counting, the Promo-LEX EOM analyzed the protocols in which the difference of the votes accumulated by the winning candidate and the one on the second position in the election of mayors is less than or equal to 50 (see Annex no. 8, no. 9). In the case of at least 23% of DEC's I the number of ballots declared invalid is greater than or equal to the difference between the first two candidates, having in this sense potential to modify the results thereof.

The Promo-LEX EOM reiterates¹³⁰ the confusion regarding the failure to examine the video evidence in the cases of votes recounting, thus reconfirming its position regarding the uselessness of the video cameras.

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130. Final Report. The Promo-LEX Election Observation Mission for parliamentary elections of 24 February 2019, p. 80. <http://bit.ly/2JEmk0k>

XIII. POST-ELECTORAL PERIOD

13.1. The case of general local elections

Pursuant to art. 146, paragraphs (1) and (2) of the Electoral Code, the District Electoral Councils of the first-level administrative-territorial units shall submit the Protocols on election results to the appropriate sector or municipality Courts. The Protocol of second-level administrative-territorial units shall be submitted to the Courts under which jurisdiction the electoral councils of the second-level administrative-territorial units fall. The Courts, within 10 days after receiving the District Electoral Councils' reports, shall either confirm or invalidate the legality of elections in every district by a decision to be submitted within 24 hours after its adoption to the Central Electoral Commission and to the respective District Electoral Councils, which shall publish the final results. We note that, these rules have not been adjusted following the approval of the Law on the reorganization of the system of courts of 21.04.2016.

According to Promo-LEX observers, the legality of local councils was confirmed and validated between 28 October – 15 November, the legality of district councils was confirmed and validated between 24 October – 6 November, whilst the mandates of mayors for the second round of elections have been validated between 6 November – 20 November, inclusive. The Promo-LEX EOM points out that the design of specific rules for the express regulation of the terms in which the counting of votes or contesting of actions on election day can be ordered is necessary to ensure the predictability and transparency of the electoral process.

As for the validation of mandates of local councillors, the Promo-LEX EOM found that in at least eight settlements¹³¹ the number of mandates of councillors validated by the court is not consistent with the number of mandates established under the CEC's Decision no. 2 573 of 16.10.2019. Also, the courts have issued in some cases additional decisions to complete the number of mandates validated therein.

According to Promo-LEX observers, the recount of votes has been ordered in 17 settlements. However, there are still pending disputes in the courts, and as a result thereof, the recount of votes could be ordered. At the same time, at least 23 appeals were lodged with the court requesting the cancellation of the elections, which were examined once the legality of the elections was confirmed.

At least in one settlement, Merenii Noi village, Anenii Noi, the court did not confirm the legality of the elections due to the existence of an enforceable judgment condemning an electoral competitor. The Promo-LEX EOM points out that the court neither admitted the challenging party's request nor ordered certain actions. We are of the opinion that the court shall give a ruling in such cases and in respect of its further actions within the limits of its exclusive competence (e.g. the exclusion of the guilty candidate and the organization of repeated elections). Thereafter, the judgment issued by the Court of Anenii Noi has been quashed under the Decision of Chisinau Court of Appeal of 26 November 2019, and issued a new decision certifying the legality of elections and validating the mandate of the mayor of Merenii Noi village.

According to art. 37, paragraphs (1) and (2) of the Electoral Code, Electoral councils and bureaus shall cease their activities and be dissolved by a decision of the election body that has established them, as soon as the final results of elections are made public by the Central Electoral Commission (or by the respective District Electoral Council). As a rule, District Electoral Councils and Precinct Electoral Bureaus shall terminate their activity as soon as they have submitted all the required documents to the Central Electoral Commission and, where appropriate, to Court. The Promo-LEX EOM points out that between 29 October – 12 November 2019, the CEC convened the first meeting of councilors in the district councils, but failed to dissolve DEC II until 2nd of December.

131. Morenii Noi, Ungheni; Iurceni, Nisporeni ; Pirită, Dubasari; Holercani, Dubasari; Molovata, Dubasari; Marcauti, Dubasari; Drasliceni, Criuleni; Boscana, Criuleni.

13.2. The case of new parliamentary elections

Pursuant to art. 100 of the Electoral Code, the Central Electoral Commission shall, within 24 hours of the election results tabulation, submit to the Constitutional Court the protocol on the total number of valid votes cast, report on the results of the elections as well as the lists containing the MPs elected therein. Within 5 days following the receipt of documents from the Central Electoral Commission, the Constitutional Court shall confirm or invalidate, through an opinion, the legality of elections. At the same time, the Constitutional Court shall validate the mandates of the elected members of Parliament.

Thus, following the new parliamentary elections of 20 October 2019, the CEC has issued the Judgment no. 2 839 of 25 October¹³², approving the report on the results of the elections and submitting for validation the list of candidates elected in the uninominal constituencies.

By Judgement no. 26 of 31.10.2019¹³³, the Constitutional Court confirmed the results of the new parliamentary elections of 20 October 2019 in the uninominal constituencies no. 17, Nisporeni town; no. 33, Chisinau municipality; no. 48, Slobozia town, Tiraspol and Bender municipalities, and no. 50, west of the Republic of Moldova and validated the mandates of the elected MPs: UC no. 17 – Ghenadie Verdes, UC no. 33 – Vasile-Andrei Nastase, UC no. 48 – Vitalii Evtodiev, UC no. 50 – Galina Sajin.

132. <https://bit.ly/37SuFHI>

133. <https://bit.ly/37W1vr4>

RECOMMENDATIONS

To the Parliament of the Republic of Moldova:

1. Amendment of art. 8 and 133 of the Electoral Code in order to establish a fixed date for conducting general local elections.
 2. Completion of the Electoral Code with provisions ensuring the establishment of a period of time (for example, from the beginning of the electoral period or from the date of the elections), in which it will be prohibited to make changes to the existing legal and normative framework in the electoral field, including the one subordinate to the law.
 3. Completion of art. 134 of the Electoral Code with provisions that would establish a certain period of time (for example, 3 months) before the elections, when the assigning of voters to certain addresses / polling stations would be “frozen”. In this way, the „artificial migration” of voters could be excluded, with an impact on local elections.
 4. Amendment of art. 46, para. (1) of the Electoral Code in order to extend the period of designation of candidates in the case of local elections.
 5. Creating equal conditions for competitors registered in local elections by imposing the mechanism of collecting signatures in their support for all categories of competitors.
 6. Amendment of art. 138 of the Electoral Code by revising the formula for calculating the number of signatures necessary for a candidates’ registration for the position of mayor. We remind you that the Code of Good Practice in Electoral Matters states that the Law should not require the collection of signatures of more than 1% of voters in that constituency.
 7. Amendment of art. 52 para. (7) with a view to define administrative resources in line with international standards and setting appropriate sanctions for their misuse (with immediate effect of prevention and deterrence).
 8. Completion of the Electoral Code with provisions that would discourage the misuse of administrative resources during the electoral period or in the period preceding the electoral campaign.
 9. Establishing legal mechanisms to prevent, combat and penalise hate speech during the electoral period.
 10. Completion of art. 43 para. (1) of the Electoral Code with express provisions that would oblige the CEC to publish data on the donors’ domicile / headquarters and the occupation / place of work or type of activity.
 11. Reintroduction of the phrase „as well as the material support in other forms” to art. 41, para. (2) of the Electoral Code.
 12. The exclusion from art. 47, para. (3) of the Electoral Code of the phrase “The subscription list shall contain only signatures of supporters residing in a single settlement”.
 13. Explicit legal regulation of the procedures for organizing and conducting exit-poll surveys, respectively, of the status of the interview operators.
 14. Amending the Electoral Code by supplementing it with provisions regulating the conditions for organizing and conducting the second round of elections, namely: the competent body and the deadline for establishing the date of the second round of elections; the start date of the election campaign for the second round and the rules regarding the financing of the election campaign; the procedure and the deadlines for the recount of votes; the procedure and the deadlines for contesting the results of the first round of elections in case of establishing the second round of elections; the voting conditions of the persons who changed their domicile / residence during the period between both rounds of elections and of those who submitted applications for voting at the domicile.
 15. Modification of the Law on Political Parties by returning to the previous coefficient for allocating state subsidies, in particular, increasing the share of subsidies from 0.1% to 0.2% of the state budget revenues for financing political parties in line with the performances obtained in national and local elections.
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To the Central Electoral Commission:

16. Organizing and conducting, in a timely manner and in accordance with the legal procedures, of public consultations with regard to the draft normative acts relevant for the ongoing electoral processes. Publication of the results of public consultations (synthesis).
17. The application for the local elections of the special rule by which the right to vote in the local elections is conditioned by the criterion of domicile of the voter, and not that of the residence.
18. Development of internal mechanisms within the CEC to streamline the process of monitoring, documenting and sanctioning hate speech (instructions, guidelines).
19. Elaboration of a regulation for the operation and use of the „Subscription lists” application, containing the description of information on which the application is based and the development of an easy procedure to challenge the results provided by the application.
20. Elucidation of the aspects regarding the legal status of the applications / notifications / requests from the electoral period, as well as the deadlines and the way to solve them, including those submitted by the candidates (potential candidates not yet registered) to an elective function.
21. The express delimitation of the notifications and the complaints filed, the manner and the deadlines for their resolution or the unification of the practice of solving any requests regarding the violations invoked therein.
22. Placing information regarding the submitted appeals and handling thereof on the institution’s website in terms that would allow the electoral process to be observed in a timely manner.
23. Modification of the Regulation on the financing of electoral campaign by introducing the obligation to fill out the financial reports for electoral campaigns in accessible formats (“open data” format) and subsequently publishing them on the official website of the CEC.
24. Verification, in accordance with the legal provisions, of the origin of the income of the electoral competitors, not admitting false documents, either by using the ECC or by issuing cash receipts.
25. Summoning the electoral competitors registered in the general local elections for the failure to submit the mandatory financial reports.
26. Introducing the financial value of the material donations reported in Annex 4, related to the Report on the financing of election campaigns, on its balance sheet, in this case, in the section II entitled turnover of financial resources.
27. Regulation of the procedure and deadlines for submitting and examining the request regarding the modification of the lists of counsellors and subsequently the adoption of a decision in respect thereof, in order to comply with the minimum representation quota.
28. Amendment of section 36 of the Regulation on the preparation, administration, dissemination and updating of voters’ lists in order to provide a mechanism for the realization of the constitutional right to vote in local elections to people who do not have a domicile or a residence.
29. Amending the section 161 of the Regulation on the placement of electoral advertising and political promotion materials on advertising panels in order to comply with the provisions of the Electoral Code, in the part related to the distinction between electoral advertising and electoral agitation.
30. The application by the CEC, including in order to prevent the artificial migration of voters, of the provisions of art. 44, para. (7) of the Electoral Code with reference to the voting mechanism through the use of certificates for voting rights of voters who change their domicile/residence in the period between the date of drawing up the voters’ lists and the date of the elections.

To Local Public Administration

31. Ensuring the publication on the web page of information about the electoral process and about the candidates registered in the general local elections in the area of responsibility.

LIST OF ABBREVIATIONS

- ACUM Bloc** – “ACUM: DA and PAS Platform” electoral Bloc
- ANI** – National Authority for Integrity
- art.** – article
- ATU** – administrative-territorial unit
- ATUG** – Autonomous Territorial Unit of Gagauzia
- CCALC** – Civic Coalition for Free and Fair Elections
- CEC** – Central Electoral Commission
- CICDE** – Center of Continuous Electoral Training under the CEC
- city** – city
- CMC** – Chisinau municipal council
- com.** – commune
- CPA** – central public administration
- DEC I** – level I district electoral council
- DEC II** – level II district electoral council
- DEC for SMC** – District electoral council for Single member constituency
- DUE** – the Delegation of the European Union to Moldova
- EC** – electoral constituency
- EOM** – Election Observation Mission
- F.B.** – final balance
- I.B.** – initial balance
- IC** – independent candidate
- IG** – initiative group
- let.** – letter
- LPA** – local public administration
- LTO** – long-term observer
- MPA** – Antimafia Popular Movement, Political Party
- MPSN** – “Speranta – Nadejda” Professional Movement, Political Party
- MSPFN** – “New Force” Social-Political Movement, Political Party
- mun.** – municipality
- no.** – number
- OSCE** – Organization for Security and Cooperation in Europe
- OSCE / ODIHR - OSCE** Office for Democratic Institutions and Human Rights
- p.** – point
- PAD** – Party of Democratic Action
- para.** – paragraph
- PAS** – Political Party of Action and Solidarity
- PCRM** – Communist Party of the Republic of Moldova
- PDM** – Democratic Party of Moldova
- PEB** – precinct electoral bureau
- PL** – Liberal Party
- PLDM** – Liberal Democratic Party of Moldova
- PN** – Our Party, Political Party
- PNL** – National Liberal Party
- POM** – Political Party of Working People
- PPDA** – Democracy at Home, Political Party
- PPEM** – European People’s Party of Moldova, Political Party
- PPM** – Patriots of Moldova, Political Party
- PPPDA** – Dignity and Truth Platform, Political Party
- PPR** – Romanian People’s Political Party
- PPRM** – People’s Party of the Republic of Moldova, Political Party

PPS – Political Party of Sor
PPVP – The Will of the People, Political Party
PS – polling station
PSA – Public Services Agency
PSE – European Left Political Party
PSM – Socialist Party of Moldova
PSRM – Party of Socialists of the Republic of Moldova Political Party
PUN – The Party of National Unity
PVE – Green Ecologist Party
REO – Registry of Electoral Officials
SAISE – the state automated information system “Elections”
SMC – Single Member Constituency
SRP – State Registry of Population
SRV – State Registry of Voters
STO – short-term observer
TO – territorial organization
UNDP – United Nations Development Program
USAID – United States Agency for International Development
USB – Union Save Bessarabia, Political Party
v. – village

ANNEXES

ANNEX 1. CEC's Decisions

Table 1.1. CEC's Decisions. General Local Elections

Thematic content of decisions adopted by the CEC during the electoral and post-electoral period in order to organize the general local elections	Dec. No.
Decisions to hold and organize the general local elections: approval of the Calendar Program; allocation of tasks among the CEC members; establishing the number of mandates of Local Councillors; the additional responsibilities of central, local public administration authorities and institutions; applying the CEC decision on the list of parties and other social-political organizations with the right to participate in new parliamentary elections, including general local elections; discharging of permanent job duties and convening certain DEC II members; approving both the staffing plan of DEC II and the decisions amending the annexes; approving both the samples of ballot papers and the decisions amending them; approving the electoral symbols of the parties and social-political organizations registered as electoral competitors; approving the samples of ballot papers for the election of councillors in the council of Comrat municipality as well as in Congaz village council, ATU Gagauzia; the manner of participation of citizens of the Republic of Moldova residing in Chitcani commune, Cremenciug and Gisca villages, in the election of councillors of Causeni district council; approving the samples of ID Cards for the mayor and councilor in the local council; conducting the pilot project to test the voter identification system in the polling stations through bar code readers; participation of voters in the elections of 20 October 2019 and totalization of the results of the general local elections; establishing the monthly amount of subsidies from the state budget for political parties for August-December 2019.	17
Matters pertaining to the finances of electoral competitors: establishing the amount of interest-free credit granted to electoral competitors; establishing the general ceiling of the financial means that can be transferred to the "Electoral Fund" account of the electoral competitor; the reports of the competitors regarding the accumulated money means and the expenses incurred in the electoral campaign; the reports of the electoral competitors regarding the accumulated money means and the expenses incurred in the electoral campaign.	4
Approval of regulations and instructions: regarding the particularities of nomination and registration of candidates in local elections; regarding the reflection of the electoral campaign for general local elections; regarding the financing of the electoral campaigns of the electoral competitors; of the Instruction on the particularities of exercising the right to vote in local elections.	3
Amendment of regulations and instructions: regarding the financing of the activity of political parties; regarding the activity of the electoral council; on drafting, presenting and checking the subscription lists; on the draw lots procedure; on the status of observers; on ad placement; on preparation, administration, distribution and updating of the voters' lists; on the financing of the electoral campaigns of the competitors; on the operation of the video recording system in the PS; amending and supplementing the Instruction on the particularities of exercising the right to vote in local elections; on financing the activity of political parties.	9
Establishment of DEC II.	35
Approving the candidacy of persons responsible for finances (treasurers) nominated by electoral competitors, for both general local elections and new parliamentary elections as well as the decisions amending them.	17
Registration of both "ACUM: DA and PAS Platform" electoral Bloc and its electoral symbol/logo.	1
On complaints and notifications.	15
Changing the composition of DEC II.	49
Accreditation of both national and international observers.	60
Approving the candidacy of representatives entitled to consultative vote in respect of electoral competitors in the CEC.	7

On the second round of elections: date for holding the second round of elections of the general mayor of Chisinau municipality and mayors in certain electoral constituencies and the amendment decision; approving the staffing plan for the electoral councils of level II electoral constituencies in the second round of elections; extending the time limit for the discharge of permanent job duties and convening certain DEC II members; conducting, during the second round of the general local elections, an opinion poll at the exit of polling stations (exit-poll type); extending the time limit for the discharge of permanent job duties and convening certain DEC II members in Chisinau, for the purpose of aggregation of the results of the second round of elections; participation of voters in the elections on 03.11.2019 and totalization of the results of the general local elections.	7
Decision to convene the first session of councilors in both district and municipal councils.	37
TOTAL	261

Table 1.2. CEC's Decisions. New Parliamentary Elections

Thematic content of decisions adopted by the CEC during the electoral and post-electoral period in order to organize the new parliamentary elections	Dec. No.
Decisions to hold and organize the new parliamentary elections: establishing the date for holding the new parliamentary elections; approval of the Calendar Program; the additional responsibilities of central, local public administration authorities and institutions; the list of parties and other social-political organizations with the right to participate in new parliamentary elections as well as the amendment decisions; discharging of permanent job duties and convening certain DEC's for SMC members as well as the decision amending them; approving the staffing plan for the DEC's for SMC; establishing the number of trusted persons of electoral competitors in the new parliamentary elections; establishing PSs for voters in the settlements from the left bank of the Dniester river – DEC's for SMC no. 47; establishing PSs abroad – DEC's for SMC no. 50; approving the sample of the ballot paper; establishing the circulation of the ballot papers; delivery of MP mandates in the Parliament of the Republic of Moldova; approving the Report on the results of the new parliamentary elections; initiation of the validation procedure in respect of an MP in the Parliament of the Republic of Moldova.	17
Matters pertaining to the finances of electoral competitors: approving the bill of costs for organizing and holding the new parliamentary elections for the post of MP; establishing the general ceiling of the financial means that can be transferred to the account "Intended to the initiative group/groups"; establishing the general ceiling of the financial means that can be transferred to the "Electoral Fund" account of the electoral competitor; establishing the amount of interest-free credit granted to electoral competitors; financial reports of the initiative groups; reports on income and expenses incurred by the electoral competitors during the election campaign; reports on income and expenses of electoral competitors.	7
Approving the candidacy of persons responsible for finances (treasurers) nominated by electoral competitors.	2
Approving the candidacy of representatives entitled to consultative vote in respect of electoral competitors in the CEC, for the new parliamentary elections only.	2
Changing the composition of the DEC's for SMC.	4
Approval of regulations: regarding the reflection of the electoral campaign for the new parliamentary elections.	1
Amendment of regulations: regarding the particularities of nomination and registration of candidates running for MP in the Parliament of the Republic of Moldova; regarding the reflection of the electoral campaign for the new parliamentary elections in the media; on the voting procedure for citizens of the Republic of Moldova abroad.	3
Registration of both "ACUM: DA and PAS Platform" electoral Bloc and its electoral symbol/logo.	1
Establishment of the DEC's for SMC no. 17 Nisporeni, the DEC's for SMC no. 33 Chisinau, the DEC no. 48 Slobozia town, Tiraspol and Bender municipalities and DEC no. 50 west of the Republic of Moldova.	4
Accreditation of both national and international observers for the new parliamentary elections only.	2
Complaints.	2
TOTAL	45

ANNEX 2. Observers nominated by the electoral competitors and accredited by the DEC

Chart no. 2.1

Number of national observers nominated by the electoral candidates and accredited at the level of DEC I

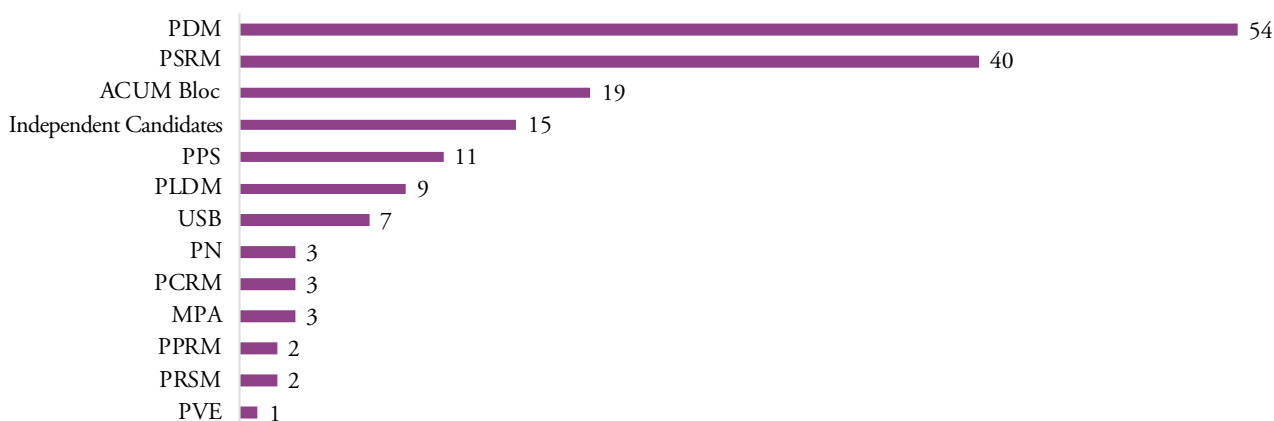


Chart no. 2.2

Number of national observers nominated by the electoral candidates and accredited at the level of DEC II

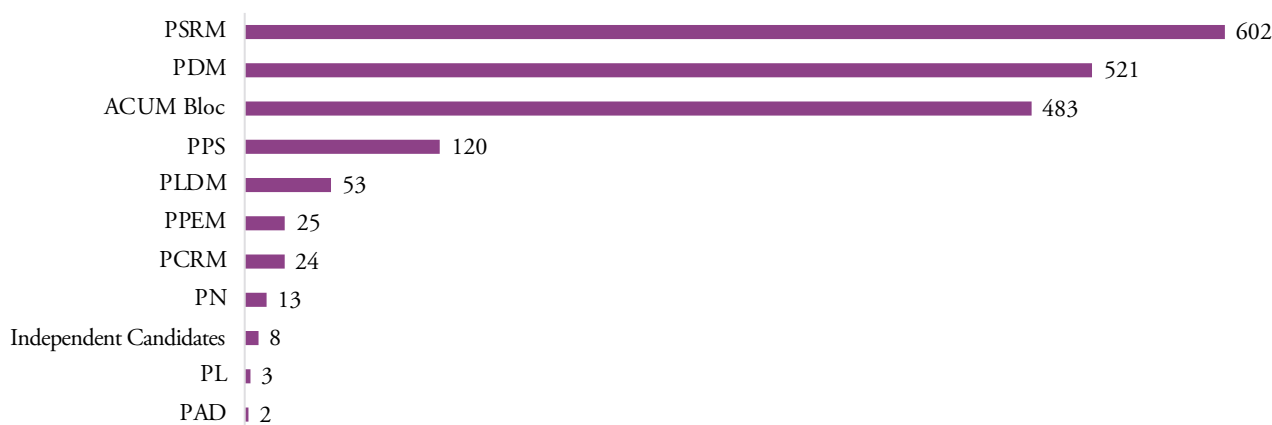
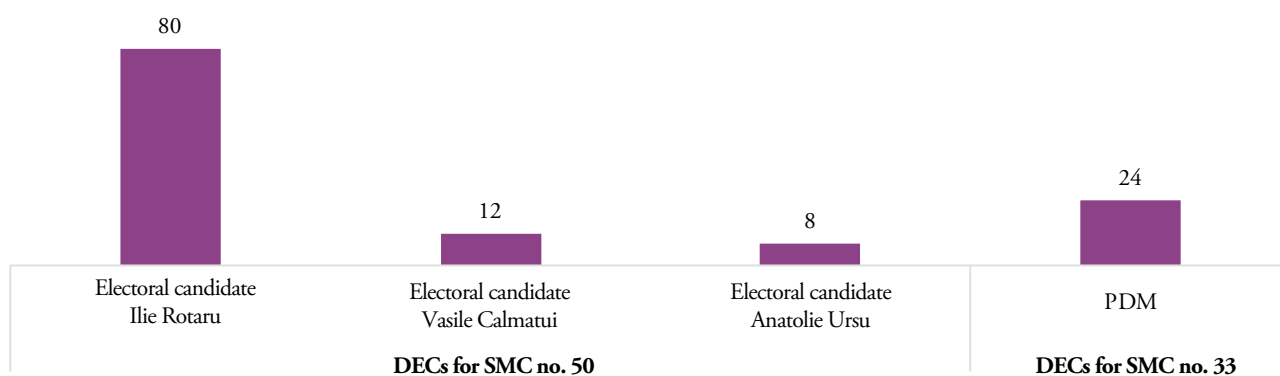


Chart no. 2.3

Number of national observers nominated by the electoral candidates and accredited at the level of DEC for SMC



ANNEX 3. Turnout rate in DEC for SMC no. 48 and no. 50

Chart no. 3.1

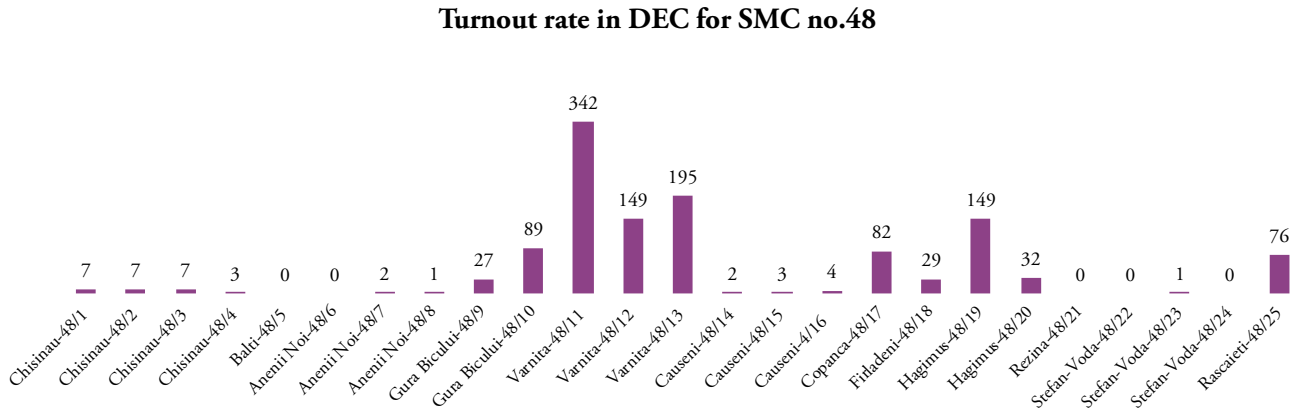
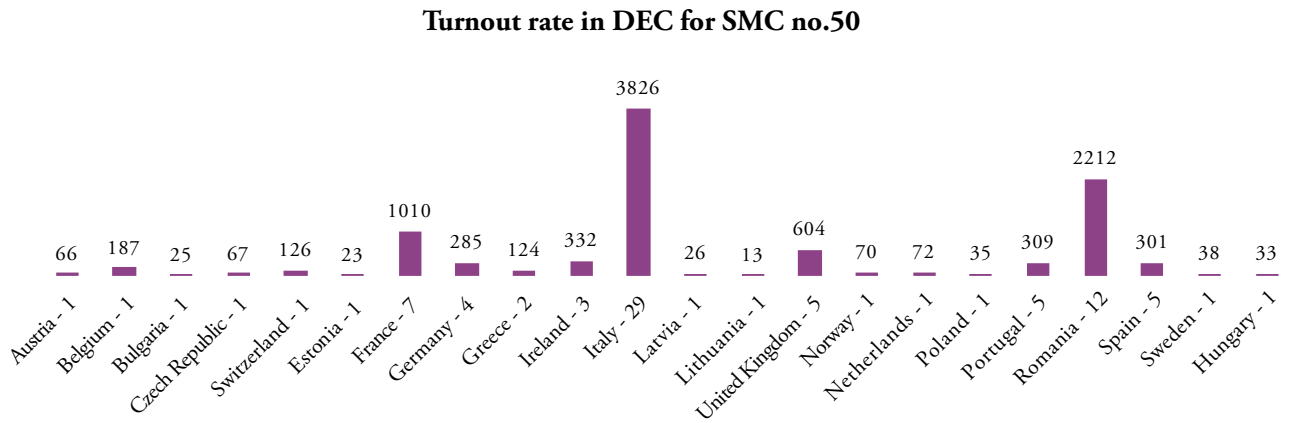


Chart no. 3.2



ANNEX 4. Use of public office or public assets for electoral purposes

Electoral candidate	Date	Settlement	Details
PSRM	03.09.2019	Chisinau	When submitting his file as candidate nominated by the PSRM for the post of mayor of Chisinau municipality, Ion Ceban, together with the councilors of the PSRM political party in the CMC, held a press conference using a desk with the PSRM symbols, in the very hall of the Mayor's Office of Chisinau municipality.
PSRM	01.10.2019-04.10.2019	Comrat	The PSRM candidate running for mayor of Comrat town, Mr. Serghei Anastasov, discharged of his post of mayor in the same town, held working sessions in the town hall, the reason for this being the need to solve the problem created by the swine fever.
ACUM	04.10.2019	Stefan Voda, Crocmaz	The official car of the village hall was seen in the personal yard of the ACUM candidate for the position of the mayor of Crocmaz village, Stefan Voda, relieved of her post of mayor of the same settlement. It is important to note that the village hall has a garage, therefore, there lacks motivation for keeping the car elsewhere. The employees of the village hall, when necessary, may ask for the car keys from the mayor that has been relieved of her post.
ACUM	08.10.2019	Telenesti, Suhuluceni	The ACUM Electoral Bloc candidate for the post of mayor of Suhuluceni village, Telenesti, Mihail Curchi, although being relieved of his post of mayor of the same village, organized a working session inside the village hall.
ACUM	28.10.2019	Chisinau	In her video spot for promoting the candidate of the ACUM electoral bloc for the post of mayor of Chisinau municipality, Maia Sandu mentioned: <i>the post of MP is temporary, but the quality of citizen of Chisinau is forever. (...) Vote for Andrei Nastase!</i>
PDM	26.08.2019	Rogojeni, Soldanesti	During the event organized by the LPA dedicated to the Mother Language Day, Independence Day, Village Day as well as to the launch of a project (village hall), the PDM representatives jointly with the priest of the village were campaigning in favor of the PDM candidate running for the mayor of the village.
PDM	05.10.2019	Floresti	Floresti Division of Education organized an event on the occasion of the Teacher's Day, attended by the leadership of the PDM TO in Floresti, who introduced the PDM candidate for the post of mayor Gheorghe Gancear.
PCRM	23.09.2019	Cahul	The candidate running for the post of mayor, Petru Burlacu, head of the territorial office of social insurance, held a meeting in his office with the participation of six persons included on the list of councilor nominated by the PCRM.

ANNEX 5. Electoral meetings held within public institutions during working hours

Political Party	No.	Name of the city/district/village	Date	Name of the Institution
ACUM	1	Chisinau, Stauceni	29.10.2019	Kindergarten
	2	Riscani, Riscani	17.10.2019	“Moldtelecom” Joint-Stock Company
	3	Chisinau, Buiucani	24.10.2019	“Orizont” Theoretical Lyceum
	4	Chisinau, Codru	17.10.2019	School no. 42
	5	Căușeni, Căușeni	16.10.2019	Spitalul Raional Căușeni
	6	Anenii Noi, Mereni	25.09.2019	Health Center
	7	Cahul, Cahul	10.10.2019	“P. Rumeantev” Theoretical Lyceum
	8	Taraclia, Taraclia	15.10.2019	State University
	9	Bălți, Bălți	04.10.2019	Trolley Yard
	10	Cimislia, Cimislia	11.10.2019	“Mihai Eminescu” Theoretical Lyceum
	11	Stefan Voda, Stefan Voda	10.10.2019	Kindergarten no. 3
	12	Floresti, Floresti	11.10.2019	Kindergarten no. 7
	13	Chisinau, Centru	10.10.2019	Chisinau City Hall
	14	Floresti, Floresti	08.10.2019	“Mihai Eminescu” Theoretical Lyceum
	15	Calarasi, Calarasi	03.10.2019	Police Inspectorate
	16	Ungheni, Ungheni	03.10.2019	“Steluta” Kindergarten
	17	Calarasi, Calarasi	30.09.2019	School of Fine Arts
	18	Balti, Balti	30.09.2019	“A. Pushkin” Theoretical Lyceum
	19	Rezina, Rezina	01.10.2019	Center for Preventive Healthcare
CI	1	Cahul, Cahul	10.10.2019	“B.P. Hasdeu” State University
PDM	1	Cahul, Alexandru Ioan Cuza	24.10.2019	School
	2	Edinet, Edinet	17.10.2019	Kindergarten no. 2
	3	Edinet, Edinet	17.10.2019	“Gr. Vieru” Gymnasium
	4	Rezina, Rezina	18.10.2019	“Olimp” Theoretical Lyceum
	5	Cahul, Cahul	17.10.2019	“D. Cantemir” Theoretical Lyceum
	6	Edinet, Edinet	16.10.2019	“V. Suhomlinski” Theoretical Lyceum
	7	Cahul, Cahul	16.10.2019	“P. Rumeantev” Theoretical Lyceum
	8	Cahul, Cahul	14.10.2019	Technical School no. 2
	9	Calarasi, Sipoteni	11.10.2019	“M. Eminescu” Theoretical Lyceum
	10	Edinet, Edinet	07.10.2019	Kindergarten
	11	Edinet, Edinet	07.10.2019	Kindergarten
	12	Edinet, Edinet	07.10.2019	Territorial Office of Employment Committee
	13	Hincesti, Hincesti	04.10.2019	“M. Sadoveanu” Theoretical Lyceum
	14	Straseni, Radeni	27.09.2019	Gymnasium
	15	Orhei, Orhei	25.09.2019	Kindergarten no. 5
	16	Orhei, Orhei	25.09.2019	“Vasile Lupu” College
PLDM	1	Cimislia, Cimislia	10.10.2019	“M. Eminescu” Theoretical Lyceum
	2	Chisinau, Singera	11.10.2019	“Alexandru cel Bun” Theoretical Lyceum

PN	1	Chisinau, Buiucani	18.10.2019	LUMTEH Municipal Institution
	2	Balti, Balti	18.10.2019	Municipal Clinical Hospital
	3	Chisinau, Centru	18.10.2019	Republican Center of Medical Diagnostics
	4	Chisinau, Riscani	15.10.2019	“G. Calinescu” Theoretical Lyceum
	5	Chisinau, Riscani	16.10.2019	“G. Calinescu” Theoretical Lyceum
	6	Chisinau, Buiucani	08.10.2019	“A. Cantemir” Theoretical Lyceum
	7	Chisinau, Centru	15.10.2019	Public Medical Sanitary Institution Institute of Oncology
	8	Balti, Balti	09.10.2019	Gymnasium no. 3
	9	Balti, Balti	10.10.2019	Physical Culture School no. 1
	10	Balti, Balti	10.10.2019	Gymnasium no. 2
	11	Balti, Balti	10.10.2019	Gymnasium no. 9
	12	Balti, Balti	10.10.2019	“Apa Canal” MI
	13	Balti, Balti	11.10.2019	Gymnasium no. 14
	14	Balti, Balti	07.10.2019	“A. Pushkin” Theoretical Lyceum
	15	Balti, Balti	04.10.2019	“G. Cosbuc” Theoretical Lyceum
	16	Balti, Balti	04.10.2019	“M. Lomonosov” Theoretical Lyceum
	17	Balti, Balti	08.10.2019	“Al. I. Cuza” Theoretical Lyceum
	18	Chisinau, Centru	10.10.2019	Republican Clinical Hospital
	19	Balti, Balti	01.10.2019	Gymnasium no. 7
	20	Balti, Balti	01.10.2019	“V. Alecsandri” Theoretical Lyceum
	21	Balti, Balti	30.09.2019	“D. Cantemir” Theoretical Lyceum
	22	Donduseni, Donduseni	01.11.2019	“Apa Canal” MI
	23	Donduseni, Donduseni	01.11.2019	Public Medical Sanitary Institution District Hospital
PPR	1	Chisinau, Riscani	15.10.2019	“Alexandru Ioan Cuza” Theoretical Lyceum
	2	Chisinau, Riscani	16.10.2019	Public Medical Sanitary Institution “Sfanta Treime”
	3	Chisinau, Riscani	04.10.2019	Public Healthcare Centre
PPŞ	1	Balti, Balti	10.10.2019	Gymnasium no. 3
	2	Balti, Balti	03.10.2019	“D. Cantemir” Theoretical Lyceum
	3	Balti, Balti	08.10.2019	Gymnasium no. 2
	4	Balti, Balti	08.10.2019	“V. Maiakovski” Theoretical Lyceum
	5	Balti, Balti	03.10.2019	Kindergarten no. 49
	6	Balti, Balti	10.10.2019	Kindergarten no. 2
	7	Balti, Balti	03.10.2019	Kindergarten no. 31
	8	Balti, Balti	03.10.2019	Kindergarten no. 30
	9	Balti, Balti	30.09.2019	“N. Gogol” Theoretical Lyceum
	10	Balti, Balti	30.09.2019	Kindergarten no. 12
	11	Balti, Balti	02.10.2019	ÎM Spații Verzi
PSRM	1	Ocnita, Birladeni	16.10.2019	School
	2	Chisinau, Centru	17.10.2019	Public Medical Sanitary Institution Municipal Dermatovenerologic Dispensary
	3	Chisinau, Centru	17.10.2019	The National Center of Blood Transfusion
	4	Chisinau, Buiucani	11.10.2019	Medical Emergency Hospital
	5	Chisinau, Buiucani	11.10.2019	“Neciui-Levitchi” Theoretical Lyceum

	6	Chisinau, Buiucani	15.10.2019	Gymnasium no. 86
	7	Cahul, Cahul	16.10.2019	“P. Rumeantev” Theoretical Lyceum
	8	Chisinau, Riscani	09.10.2019	Public Medical Sanitary Institution “Sfanta Treime”
	9	Balti, Balti	07.10.2019	SE “Cai Ferate”
	10	Balti, Balti	03.10.2019	Gymnasium no. 9
	11	Edinet, Edinet	11.10.2019	Public Healthcare Centre
	12	Edinet, Edinet	11.10.2019	“P. Halippa” Theoretical Lyceum
	13	Ocnita, Clocusna	30.09.2019	Medical Station
	14	Chisinau, Centru	11.10.2019	Public Medical Sanitary Institution Municipal Clinical Hospital of Physiopulmonology
	15	Chisinau, Centru	09.10.2019	Municipal Stomatological Centre
	16	Chisinau, Centru	09.10.2019	Republican Narcological Dispensary
	17	Edinet, Edinet	10.10.2019	“Foisor” Kindergarten
	18	Edinet, Edinet	08.10.2019	“D. Cantemir” Theoretical Lyceum
	19	Chişinău, Botanica	07.10.2019	“Exdrupo” MI
	20	Edinet, Edinet	07.10.2019	Kindergarten no. 3
	21	Edinet, Edinet	07.10.2019	“V. Suhomlinski” Theoretical Lyceum
	22	Chisinau, Botanica	03.10.2019	“Speranta” Theoretical Lyceum
	23	Chisinau, Centru	04.10.2019	Family Doctors Center
	24	Chisinau, Centru	04.10.2019	Public Medical Sanitary Institution Institute of Oncology
PSRM	25	Chisinau, Centru	04.10.2019	Public Medical Sanitary Institution Republican Clinical Hospital for Children “E. Cotaga”
	26	Chisinau, Centru	03.10.2019	Railway Hospital
	27	Chisinau, Ciocana	30.09.2019	“Dacia” Theoretical Lyceum
	28	Chisinau, Botanica	01.10.2019	School of Theatre Arts
	29	Chisinau, Centru	01.11.2019	Municipal Clinical Hospital no. 1
	30	Chisinau, Centru	01.11.2019	Municipal Stomatological Centre for Children
	31	Chisinau, Buiucani	25.09.2019	Municipal Clinical Hospital for Children no. 1
	32	Chisinau, Buiucani	26.09.2019	SE Autosalubritate
	33	Chisinau, Buiucani	27.09.2019	Republican Clinical Hospital
	34	Chisinau, Riscani	29.09.2019	“Al. Russo” Theoretical Lyceum
	35	Chisinau, Ciocana	27.09.2019	Social Insurance Territorial Office
	36	Chisinau, Ciocana	25.09.2019	Kindergarten no. 67
	37	Chisinau, Ciocana	27.09.2019	Kindergarten no. 32
	38	Chisinau, Centru	27.09.2019	Republican Clinical Hospital
	39	Chisinau, Codru	26.09.2019	Psychiatric Clinical Hospital
	40	Chisinau, Centru	25.09.2019	“Moldtelecom” Joint-Stock Company
	41	Chisinau, Botanica	26.09.2019	Gymnasium no. 31
	42	Chisinau, Botanica	25.09.2019	“Gloria” Theoretical Lyceum
	43	Chisinau, Centru	24.09.2019	Public Medical Sanitary Institution Cardiology Institute
	44	Chisinau, Centru	23.09.2019	Institute of Neurology and Neurosurgery
	45	Chisinau, Ciocana	23.09.2019	Theoretical Lyceum specialized in sports no. 2

PSRM	46	Chisinau, Buiucani	20.09.2019	Territorial Medical Association
	47	Chisinau, Ciocana	23.09.2019	Primary School no. 2
	48	Chisinau, Riscani	16.09.2019	Territorial Medical Association
	49	Chisinau, Riscani	16.09.2019	Municipal Design Institute “Chisinauproiect”
	50	Chisinau, Riscani	16.09.2019	Republican Experimental Center for Prosthesis, Orthopedics and Rehabilitation
	51	Chisinau, Buiucani	12.09.2019	Kindergarten no. 20
	52	Chisinau, Buiucani	13.09.2019	Kindergarten no. 62
	53	Chisinau, Riscani	10.09.2019	Public Medical Sanitary Institution “Sf. Arhanghel Mihail”
PUN	1	Chisinau, Buiucani	07.10.2019	Medical emergency Hospital
	2	Chisinau, Buiucani	16.10.2019	“Liviu Deleanu” Theoretical Lyceum
	3	Criuleni, Dubasarii Vechi	16.10.2019	“Nicolae Donici” Theoretical Lyceum
	4	Balti, Balti	11.10.2019	“Stefan cel Mare” Theoretical Lyceum
	5	Balti, Balti	08.10.2019	Physical Culture School no. 2
	6	Balti, Balti	11.10.2019	Agency of Ecology
	7	Balti, Balti	11.10.2019	Health Care Center no. 1
	8	Balti, Balti	08.10.2019	“Lucian Blaga” Theoretical Lyceum
	9	Balti, Balti	03.10.2019	“M. Eminescu” Theoretical Lyceum
	10	Balti, Balti	10.10.2019	Health Care Center no. 2
	11	Balti, Balti	07.10.2019	Center for Mental Health
	12	Balti, Balti	10.10.2019	“B. P. Hasdeu” Theoretical Lyceum
	13	Balti, Balti	08.10.2019	“A.I. Cuza” Theoretical Lyceum
	14	Balti, Balti	10.10.2019	Kindergarten no. 16
	15	Balti, Balti	04.10.2019	Kindergarten no. 3
	16	Balti, Balti	09.10.2019	Municipal Clinical Hospital
	17	Balti, Balti	04.10.2019	Health Care Center no. 6
	18	Balti, Balti	09.10.2019	“Vasile Alecsandri” Theoretical Lyceum
	19	Balti, Balti	03.10.2019	Gymnasium no. 6
	20	Orhei, Orhei	02.10.2019	“M. Lomonosov” Theoretical Lyceum
	21	Balti, Balti	01.10.2019	“G. Cosbuc” Theoretical Lyceum
	22	Balti, Balti	02.10.2019	“V. Maiakovski” Theoretical Lyceum
PPVP	1	Chisinau, Centru	16.10.2019	Medical Centre of Excellence
	2	Chisinau, Centru	10.10.2019	Municipal Hospital no. 1

ANNEX 6. Claiming merits for projects implemented at public expense to accumulate both political and electoral capital

A. Claiming merits for projects implemented at public expense by the PSRM candidates – 30 cases

- 1) On 25.08.2019, the PSRM candidate running for mayor of Chisinau municipality, Mr. Ion Ceban, attended the inauguration of the fountain in the “Valea Trandafirilor” Park. In his speech, the politician mentioned about the initiative and merit of the PSRM political party in Chisinau Municipal Council (CMC) when performing the restoration works.
 - 2) On 25.08.2019, at the same time with the event for the inauguration of the fountain in the “Valea Trandafirilor” Park, in the immediate vicinity of it were seen persons sharing flyers – invitations to the inauguration event, bearing the PSRM logo, accompanied by the following message: “Dear inhabitants of Chisinau municipality, after years of ruin and destruction, thanks to the efforts of the PSRM political party in Chisinau municipal council, the musical fountain in the “Valea Trandafirilor” Park has been renovated!... We invite you to the solemn opening!”
 - 3) In August, the PSRM candidate running for mayor of Chisinau municipality, Ion Ceban, in a message posted on social networks declared that “10 new stadiums and 150 sports pitches have been installed in the yards of the residential buildings of the city in a year’s time due to the program developed by the Party of Socialists in Chisinau municipal council”. The councilor in CMC, Silvia Grigore, nominated by the PSRM, also published similar messages on social networks.
 - 4) Silvia Grigore, the PSRM candidate for the post of councilor in Chisinau municipal council, following a working (verification) visit to the Kindergarten no. 199 “Lastaras”, published on social networks photos showing the poor state of the institution accompanied by the message: “we, councilors of the Party of Socialists, will make a financial contribution to help repair and buy new equipment, because the one you see in the photo is totally outdated”.
 - 5) A banner bearing the PSRM logo was installed on a residential building located at Valea Dicescu St. displaying some information about the start of works of repairing the playground and allocation of financial resources to this end. The message was signed by the PSRM party in the CMC.
 - 6) On 18.09.2019, Alexandr Odintov, the PSRM candidate for the post of councilor in Chisinau municipal council, referring to works of capitals repairs initiated in the “C. Sibirschi” Theoretical Lyceum, posted on social networks the following message: “I promised parents to help them with the repair. We’ve managed to collect some funds this summer and ... here I am doing repair works”.
 - 7) Iurie Dimitriu, the PSRM candidate for the post of councilor in Chisinau municipal council, run a live session in which he mentioned the merits of his team in starting the construction of a playground at Grenoble St.
 - 8) Referring to the development of a sports pitch on the territory of Budesti village Lyceum, on the social network belonging to PSRM Budesti, we’ve found the following message: “Thanks to contributions made by Mr. Ion Ceban and projects implemented by his team in Chisinau municipal council, today after so long, inhabitants of Budesti can enjoy a modern fitness pitch installed on the territory of Budesti village Lyceum”.
 - 9) Referring to the installation of benches in Codru town, on social networks appeared the following message: “Upon the request of inhabitants, the team of PSRM political party composed of Iv. Ceban, Svetlana Popa, Iurie Dimitriu continues to install benches to make people happy!”
 - 10) Referring to the repair of the local road in Gratiesti, on social networks appeared the following message: “Road repair works at Veronica Micle St. are in progress. Promises made by the candidate running for mayor, Mrs. Elena Cazacu, are being fulfilled”.
 - 11) Iurie Dimitriu, the PSRM candidate running for the post of mayor of Codru town, referring to the trolley line for Codru town, run a live session on social networks in which he expresses his thanks to the PSRM political party, namely to Ion Ceban and Svetlana Popa (the PSRM candidate running for MP, constituency no. 33).
 - 12) Iurie Dimitriu, the PSRM candidate running for the post of mayor of Codru town, referring to the road repair works in Codru town, run a live session on social networks in which he expresses his thanks to the PSRM political party, namely to Ion Ceban and Svetlana Popa (the PSRM candidate running for MP, constituency no. 33).
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- 13) The PSRM candidate running for mayor of Colonita village, Angela Zaporozjan, referring to the lighting for the village park, posted on social networks the following message: “We are deeply thankful to councilors from the Party of Socialist for the lighting of Colonita Park”.
- 14) On 11.10.2019, referring to the repair of the building of the Social Insurance Department of Botanica city district as well as to the location of an access ramp for people with disabilities, the PSRM candidate for the post of counsellor in the Chisinau municipal council, Iurii Vitneanschi has published on social networks the following message: “we finished the works on the installation of an access ramp for people with disabilities in the Social Insurance Department (...) We proceeded to the repair of the façade of the respective building. Previously, at the initiative of socialist counsellors, the capital repair of the building was carried out”.
- 15) On 11.10.2019, referring to the arrangement of the courtyards of the residential buildings (at public expense), the PSRM candidate for the post of counsellor in the Chisinau municipal council, Iurii Vitneanschi has published on social networks the following message: “The socialist program on improving the courtyards of the residential buildings continues to operate. A sports area is rebuilt at 5 Cetatea Alba Street. This is the third stadium in Botanica city district, which will be renovated this year. In total, in 2019 we will provide the inhabitants with 19 similar sports areas”.
- 16) On 10.10.2019, referring to the construction of a road in Botanica city district, the PSRM candidate for the post of counsellor in the Chisinau municipal council, Iurii Vitneanschi has published on social networks the following message: “the repair costs 6 million lei, which were allocated from the municipal budget at the initiative of the socialist faction from Chisinau”.
- 17) On 3.10.2019, referring to the installation of public benches in Botanica city district, the PSRM candidate for the post of counsellor in the Chisinau municipal council, Iurii Vitneanschi has published on social networks the following message: “we continue to work on the installation of benches. The work is carried out within a program launched by socialists. We plan to install 50 public benches more until the end of the month (...). The addresses are already set and approved according to the citizens’ requests”.
- 18) On 3.10.2019, referring to the installation of pedestrian sidewalks in Botanica city district (at public expense), the PSRM candidate for the post of counsellor in the Chisinau municipal council, Iurii Vitneanschi has published on social networks the following message: “the cost of the works carried out will be more than half a million lei. We thank Iv Ceban for the opportunity to meet people’s demands!”.
- 19) On 2.10.2019, referring to the installation of public benches in Botanica city district, the PSRM candidate for the post of counsellor in the Chisinau municipal council, Iurii Vitneanschi has published on social networks the following message: “as part of the program for the improvement of courtyards, today we’ve installed benches in four courtyards of residential buildings. All the works are carried out on the basis of the requests from Chisinau inhabitants addressed to socialist counsellors”.
- 20) On 29.09.2019, at the commissioning of a multifunctional stadium in Buiucani city district, the event was attended by PSRM representatives wearing t-shirts with the party’s logo. Also on that day the team of the residents from the neighbouring houses played a football match with the team of the PSRM. The PSRM candidate for the post of counsellor in the Chisinau municipal council, Dinari Cojocararu has published on social networks the following message: “the construction of the stadium was carried out within the program of courtyards’ planning. Today, at the opening, together with the inhabitants of the neighboring houses, we played football and basketball. Friendship won”.
- 21) On 24.09.2019, referring to the operation of a social canteen in Botanica city district, the PSRM candidate for the post of counsellor in the Chisinau municipal council, Iurii Vitneanschi has published on social networks the following message: “the Party of Socialists in the Municipal Council have increased the number of persons and families allowed to have meals in these social canteens. We offered meals to 1 200 persons. Social assistance is on the priority list of the PSRM and Iv. Ceban personally”.
- 22) Ion Ceban, the PSRM candidate running for mayor of Chisinau municipality, referring to the arrangement of the square in the Albisoara Park, has published on social networks the following message: “Last year, during the election campaign, we came with an extensive program on the arrangement of parks and green places. There’s still a lot to be done, but the changes are already visible”.
- 23) Ion Ceban, the PSRM candidate running for mayor of Chisinau municipality, referring to free meals, has published on social networks the following message: “More people have the opportunity to enjoy free meals. The Party of Socialists always cared for those in the city with low income. At the insistence of our party in the CMC, we have amended the regulation on offering free meals in social canteens. We proposed to include in this category people with an income of up to MDL 3 000, not only those with an income of

- up to MDL 2 000, as in previous years. We managed to increase the number of persons who can get free meals daily from 700 to 1 200 persons. We know that this is not a big deal and there's still a lot of people who need our help, but we will not stop here. We will continue developing our support programs for the most vulnerable category of the population”.
- 24) On 17.10.2019, referring to the opening of a playground in Codru town, 130 Grenoble St., on social networks appeared the following message: “We announce today the opening of a playground at 130 Grenoble St. One more playground was opened last evening. This time at Campului St. in Codru town. (...) This thing was possible thanks to the PSRM party, namely Iv. Ceban, Svetlana Popa and Iurii Dimitriu!”
 - 25) On 16.10.2019, referring to the inauguration of the playground in Codru town, the PSRM candidate running for the mayor of the same town, Iurie Dimitriu, has published on social networks the following message: “We have installed one more playground due to the support offered by the PSRM political party, namely Iv. Ceban and Svetlana Popa”.
 - 26) On 6.10.2019, referring to playgrounds arranged in Botanica city district (at public expense), the PSRM candidate for the post of counsellor in the Chisinau municipal council, Iurii Vitneanschi has published on social networks the following message: “the works on the installation of playgrounds have been carried out within the program launched by socialists, who established 112 playgrounds in 2018, while this year 115 more, as well as over one hundred fitness facilities as well as facilities of other types”.
 - 27) On 2.09.2019, the PSRM candidate running for councilor in the CMC, Nichita Turcan, referring to the repair of “Petru Movila” Theoretical Lyceum, has published on social networks the following message: “One year ago, we promised to help the administration of the Lyceum to improve the study conditions. Due to the efforts made by the PSRM in the municipal council, funds were granted for the purchase and repair of the roof of the education institution. The second to be renovated will be the stadium. This is just the beginning”.
 - 28) On 1.09.2019, referring to repair works carried out in the “Alunelul” Park, the PSRM candidate running for mayor of Chisinau municipality, Ion Ceban has published on social networks the following message: “The pedestrian alleys (a total of 7 800 sq. m.) in the Alunelul park have been repaired this year both at the initiative of the political party and with the support of CMC, allocating financial resources in this respect”.
 - 29) Ion Ceban, the PSRM candidate running for mayor of Chisinau municipality, referring to the sole allowance amounting to MDL 2 000 for the second child, has published on social networks the following message: “Last year, during the election campaign, we promised that this allowance will be kept, while the categories of beneficiaries will be extended. This allowance was granted to needy families, where first child was born. In all this time, we managed to provide support to 2 500 families, while the program is still in place. We promised to offer milk products as well as other products for free in the first year of the child. With the support of our colleagues in the CMC, we managed to amend the regulation, and, for the first time, families in the suburbs having twins and triplets, regardless of their social status were provided with such products”.
 - 30) People residing in Botanica city district received flyers bearing the PSRM logo, accompanied by the following message: “Dear all! Works are planned to be carried out in your yard. Together we've managed to allocate financial resources to implement some projects and everything thanks to your initiative and participation. Secretariat of the municipal fraction of the PSRM”.

B. Claiming merits for projects implemented at public expense by the PLDM representatives – 1 case

- 1) Vasile Dolghii, the PLDM candidate in Micauti village, Straseni, following his registration as candidate running for councilor, has published on social networks the following message on the repair of roads in the village: “(...) due to its personal contribution, the 3rd neighborhood together with the village hall and local council will be able to walk on a better road. I congratulate you on this and I kindly ask you to appreciate what we achieved”.

ANNEX 7. Gifts offered during the electoral period

Candidate	Location	Date	Gifts offered
ACUM	Anenii Noi, Floreni	26.10.2019	Three fir trees were planted in the village park.
	Anenii Noi, Hirbovat	15.10.2019	A portion of about 200 meters of a street in the village was repaired.
	Anenii Noi, Floreni	16.10.2019	An efficient lighting system was donated. The system thereof was installed at the entry into the village where the roundabout is located.
PCRM	Balti, Balti	24.08.2019	Bags with food products were provided for at least 19 veterans in the city.
PDM	Rezina, Gordinesti	27.10.2019	Snacks (baked rolls, apples), alcoholic beverages (champagne), at least 10 lap blankets were offered as gifts during a social event.
	Cahul, Bucuria	27.10.2019	About 20 kg of fish were offered to the inhabitants free of charge.
	Nisporeni, Marinici	29.10.2019	Bags with food products were given to the inhabitants of the village. The exact number of such bags remains unknown.
	Causeni, Causeni	28.10.2019	A truck filled with potatoes was seen in front of Causeni town hall. The pensioners exiting the town hall with the vouchers issued to receive social bread were approaching it. Based on the voucher, the pensioners received 5 kg of potatoes. At the same time, the respective people were discussing that if they will vote for the PDM candidate Grigore Repesciuc, they will receive 5 kg of potatoes, in exchange for their personal data (first name, last name, year of birth, domicile).
	Cimislia, Ialpujeni	28.10.2019	From discussions with the members of the community, it was found that in Ialpujeni village, Cimislia, the wife of the PD candidate running for mayor of the village, Eremia Pascaneanu, offered robes and money (50 and 100 lei) as a “hand-out” in the yard of the church, in the context of a religious holiday, to people, asking them to vote for her husband.
	Cimislia, Cimislia	26.10.2019	The repair of a street was started in Bogdanovca Noua village, Cimislia, by leveling it with gravel. A bulldozer, a working machine used to push large quantities of soil, sand, rubble, or other such material during construction or conversion work, trucks filled with gravel were seen there. The activity was actively promoted on social networks.
	Floresti, Varvareuca	15.10.2019	About 100 rose seedlings were planted on a plot of land from the entrance to the village.
	Hancesti, Hancesti	02.10.2019	23 benches in the town park were renovated.
PL	Hancesti, Hancesti	02.10.2019	A car were provided to pupils in the 12th form of “M. Eminescu” Theoretical Lyceum (Hancesti) to take them to the Parliament of the Republic of Moldova for a visit.
	Chisinau, Colonita	29.09.2019	A sports competition was organized, in which eight football teams participated. The winners of the competition were awarded with three balls, cups and medals.
PN	Donduseni, Rediul Mare	21.09.2019	The reconstruction works for the well spring of Raut river in Rediul Mare village, Donduseni district have been completed. A well was dug next to the spring and an iron manual pump installed.
	Basarabeasca, Basarabeasca	10.09.2019	Three benches and two rubbish bins were installed in a town park.
PPR	Chisinau, Truseni	11.09.2019	10 volumes of “History of the Republic of Moldova and Romania in pictures”, as well as more than 500 books for children in the elementary school were donated.

PPS	Dubasari, Marcauti	17.09.2019	Vehicles were provided to take the inhabitants of the village to the “OrheiLand” Amusement Park.
	Dubasari, Marcauti	07.09.2019	Two vehicles were provided to take the inhabitants of the village to the “OrheiLand” Amusement Park.
PSRM	Floresti, Floresti	06.10.2019	Two bicycles were offered as gifts during a social event.
	Taraclia, Tvardita	18.10.2019	A playground was installed.
	Edinet, Blesteni	11.10.2019	The spring in the village was renovated.
	Chisinau, Cricova	15.10.2019	About 200 trees were planted in the commune.
	Chisinau, Cricova	15.10.2019	About five bags with food products were offered to local pensioners, claiming that they would be from the Charity Organization “Din suflet” (From the heart).
	Basarabasca, Basarabasca	01.10.2019	On the occasion of the Day of Older Persons, the PSRM offered them bags with food products via their representatives who went to deliver them to their homes.
	Dubasari, Cocieri	24.09.2019	The well in the village was renovated.
	Taraclia, Budai	29.09.2019	On the occasion of the Day of Older Persons, bags with food products were offered to older persons attending the event.
	Criuleni, Criuleni	19.09.2019	As part of an organized sports competition, a cock, a rabbit and a ram were offered as prizes.
	Chisinau, Codru	02.09.2019	A school in Codru town was provided with three balls, speakers and two microphones.
PUN	Cahul, Andrusul de Jos	28.08.2019	A sports inventory was offered to the inhabitants on the occasion of the village day.
	Balti, Balti	25.08.2019	Three benches and four rubbish bins were installed in the village park.
	Ungheni, Costuleni	10.10.2019	Three benches and four rubbish bins were installed in the village park.
PPVP	Balti, Balti	16.09.2019	500 books were donated to students of “George Cosbuc” Theoretical Lyceum in Balti
	Straseni, Romanesti	13.10.2019	12 garden yucca threads were planted at the main roadside edge of the village.

ANNEX 8. Round I of local elections.
Level I constituencies where mayors have been elected
with a difference of up to 50 votes

No.	District	DEC I	DEC I No.	Difference between candidates	Invalid Ballots	Additional Lists
1.	Basarabasca	Iordanovca	5/6	19	12	5
2.	Cahul	Andrusul De Sus	7/5	33	11	5
3.	Cahul	Tataresti	7/34	43	20	1
4.	Cantemir	Pleseni	8/18	12	28	0
5.	Cimişlia	Sagaidac	11/17	50	25	0
6.	Cimislia	Suric	11/20	46	7	11
7.	Cimislia	Topala	11/21	38	5	19
8.	Criuleni	Cosernita	12/7	10	21	7
9.	Criuleni	Isnovat	12/14	17	31	0
10.	Dubasari	Marcauti	15/6	21	17	1
11.	Hancesti	Pervomaiscoe	20/32	40	2	1
12.	Ialoveni	Zambreni	21/25	19	32	10
13.	Leova	Ceadar	22/7	13	22	2
14.	Leova	Orac	22/14	36	12	3
15.	Nisporeni	Ciutesti	23/11	31	13	25
16.	Nisporeni	Soltanesti	23/18	34	17	1
17.	Orhei	Podgoreni	25/25	42	12	16
18.	Rezina	Busauca	26/2	50	18	40
19.	Sangerei	Taura Veche	28/24	25	7	1
20.	Straseni	Onesti	30/15	25	7	1
21.	Taraclia	Budai	33/7	28	7	0
22.	Ungheni	Magurele	35/19	42	22	0
23.	ATUG	Carbalia	36/9	9	3	2

ANNEX 9. Round II of local elections.
Level I constituencies where mayors have been elected
with a difference of up to 50 votes

No.	District	EC I	DEC I No.	Difference between candidates	Invalid Ballots	Additional Lists
1.	Anenii Noi	Chirca	4/6	11	12	9
2.	Anenii Noi	Maximovca	4/15	7	9	7
3.	Basarabasca	Bascalìa	5/4	6	14	8
4.	Briceni	Grimancauți	6/16	33	8	49
5.	Cahul	Andrusul de Jos	7/4	12	16	4
6.	Cahul	Bucuria	7/10	33	1	1
7.	Cahul	Burlaceni	7/12	40	2	10
8.	Cahul	Lebedenco	7/24	24	10	0
9.	Cahul	Tartaul de Salcie	7/33	40	4	1
10.	Cantemir	Chioselia	8/6	20	10	1
11.	Cantemir	Gotesti	8/14	39	17	22
12.	Cantemir	Toceni	8/25	36	8	3
13.	Calarasi	Dereneu	9/6	26	10	36
14.	Calarasi	Frumoasa	9/7	8	13	6
15.	Calarasi	Hirova	9/8	0	12	1
16.	Calarasi	Raciula	9/19	8	17	10
17.	Causeni	Baimaclia	10/4	35	14	10
18.	Causeni	Chircaiestii Noi	10/7	41	8	1
19.	Causeni	Gradinita	10/13	10	5	18
20.	Causeni	Pervomaisc	10/17	16	2	3
21.	Cimislia	Ialpujeni	11/11	3	2	24
22.	Cimislia	Porumbrei	11/16	11	5	2
23.	Criuleni	Raculesti	12/22	28	8	5
24.	Criuleni	Rascova	12/23	15	7	4
25.	Criuleni	Zaicana	12/25	30	12	2
26.	Donduseni	Briceni	13/4	12	11	0
27.	Donduseni	Frasin	13/11	30	17	20
28.	Drochia	Fantanita	14/8	25	3	1
29.	Drochia	Gribova	14/9	26	37	4
30.	Edinet	Terebna	16/28	29	10	4
31.	Falesti	Catranic	17/4	9	11	3
32.	Falesti	Calinesti	17/5	5	4	5
33.	Falesti	Egorovca	17/9	26	10	8
34.	Floresti	Cuhurestii de Jos	18/11	5	14	5
35.	Floresti	Domulgeni	18/14	38	6	3
36.	Floresti	Iliciovca	18/19	12	7	4
37.	Floresti	Napadova	18/24	44	0	6

38.	Floresti	Targul Vertiujeni	18/35	17	3	0
39.	Glodeni	Hajdieni	19/12	37	10	5
40.	Hincesti	Carpineni	20/10	46	49	14
41.	Hincesti	Mereseni	20/24	24	16	5
42.	Hincesti	Nemteni	20/28	44	5	1
43.	Hincesti	Voinescu	20/39	20	6	1
44.	Ialoveni	Carbuna	21/3	32	1	2
45.	Ialoveni	Dancenii	21/6	14	3	22
46.	Ialoveni	Horodca	21/10	3	4	0
47.	Ialoveni	Malcoci	21/11	26	20	4
48.	Leova	Baius	22/3	1	11	3
49.	Leova	Bestemac	22/4	24	5	0
50.	Leova	Filipeni	22/12	47	9	2
51.	Leova	Tochile-Raducani	22/22	8	6	6
52.	Nisporeni	Balauresti	23/3	44	14	11
53.	Ocnita	Lipnic	24/14	31	45	39
54.	Ocnita	Mihalaseni	24/16	35	7	3
55.	Orhei	Ciocalteni	25/8	10	10	58
56.	Orhei	Crihana	25/10	28	11	15
57.	Orhei	Pohorniceni	25/26	47	6	10
58.	Orhei	Step-Soci	25/31	16	20	18
59.	Orhei	Susleni	25/32	38	28	8
60.	Orhei	Teleseu	25/33	37	8	7
61.	Rezina	Ciniseuti	26/3	3	16	11
62.	Rezina	Gordinesti	26/8	50	5	0
63.	Rezina	Solonceni	26/23	20	13	7
64.	Riscani	Alexandresti	27/3	12	4	4
65.	Riscani	Pirjota	27/17	34	13	0
66.	Riscani	Pociumbeni	27/19	35	3	3
67.	Riscani	Racaria	27/20	9	9	30
68.	Riscani	Sumna	27/25	34	1	1
69.	Singerei	Balasesti	28/4	0	6	4
70.	Singerei	Izvoare	28/20	18	1	0
71.	Soroca	Bulboci	29/4	26	9	1
72.	Soroca	Ocolina	29/16	49	4	5
73.	Soroca	Parcani	29/17	34	13	0
74.	Soroca	Racovat	29/19	25	17	18
75.	Soroca	Volovita	29/34	42	5	2
76.	Soroca	Zastanca	29/35	24	16	21
77.	Straseni	Negresti	30/14	48	18	13
78.	Straseni	Romanesti	30/19	9	6	2
79.	Straseni	Roscani	30/20	49	14	7
80.	Soldanesti	Chipesca	31/3	2	7	2

81.	Soldanesti	Glinjeni	31/11	34	7	10
82.	Soldanesti	Mihuleni	31/12	17	5	1
83.	Soldanesti	Sestaci	31/21	33	6	3
84.	Stefan Voda	Alava	32/2	39	3	27
85.	Stefan Voda	Cioburciu	32/7	9	8	5
86.	Stefan Voda	Rascaieti	32/17	12	18	8
87.	Stefan Voda	Tudora	32/22	46	7	0
88.	Taraclia	Albota de Jos	33/3	8	9	6
89.	Telenesti	Chitcanii Vechi	34/8	48	6	23
90.	Telenesti	Codrul Nou	34/11	20	2	11
91.	Telenesti	Coropceni	34/12	37	13	2
92.	Telenesti	Crasnaseni	34/13	48	6	3
93.	Telenesti	Hiriseni	34/15	0	19	1
94.	UTAG	Congazcicul de Sus	36/17	4	23	11

ANNEX 10. Reports submitted by independent candidates for the general local elections

Chart no. 10.1

Submission of financial reports of ICs with the DEC II

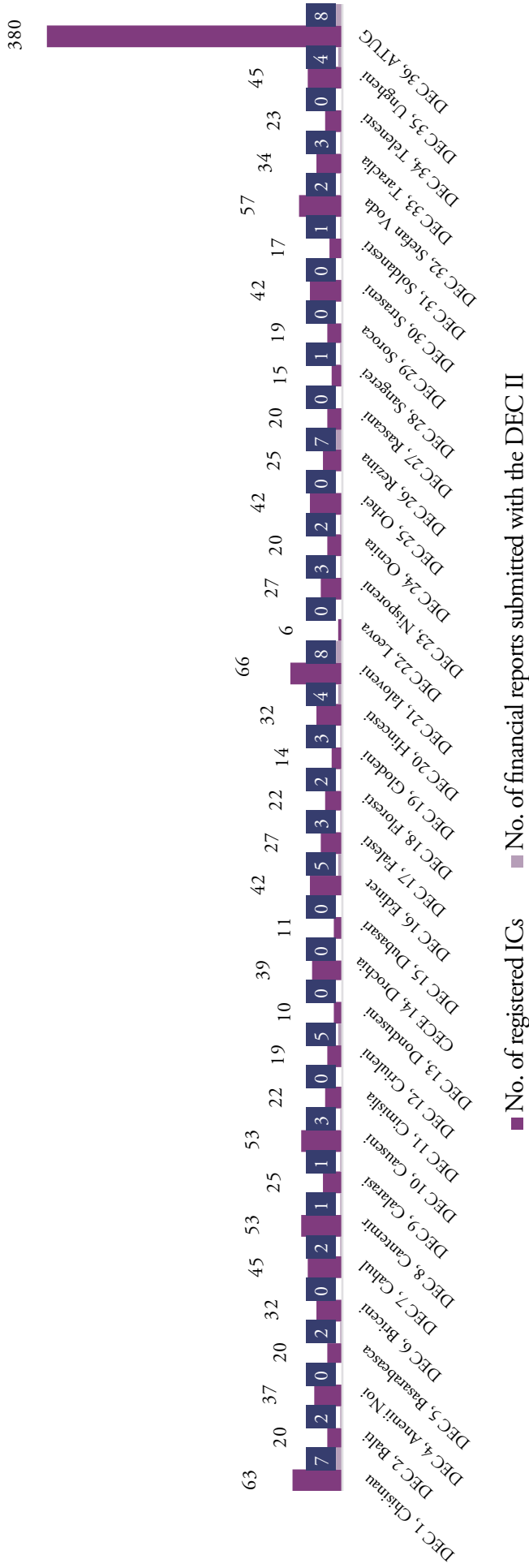


Chart no. 10.2

Submission of the request for non-payment of expenses of ICs with the DEC II



■ No. of requests for non-payment of expenses submitted with the DEC II ■ No. of registered ICs

ANNEX 11. Description of expenses incurred on public events

The expenses incurred on public events include as follows: costs of renting the premises/location in which the event took place, the stage, sound accompaniment, media coverage, artists' fees, expenses on props, etc. When estimating the expenses for electoral events/concerts, it was taken as a basis of calculation the multiplication of each artist's fee (market rate) that evolved for a certain competitor at the de facto time worked. At least 179 972 lei were estimated for press conferences. The total estimated expenses for public events/concerts/electoral meetings/sports competitions are at least 2,593,266 lei.

PSRM organized at least 224 electoral meetings, 37 concerts and public demonstrations involving youth workers and artists, 22 press conferences as well as a live reflection of a concert for 4.40 h; **PPS** – 73 electoral meetings, 13 concerts of which seven events “Golden Age”, five press conferences; **ACUM Bloc** – 183 electoral meetings, eight public events involving youth workers and artists, eight press conferences; **PN** – 89 electoral meetings, five concerts and public demonstrations, two press conferences; **PDM** – 98 electoral meetings, 5 concerts and public demonstrations, three press conferences; **PCRM** – five electoral meetings, one concert, two press conferences; **PL** – four electoral meetings, one concert, seven press conferences; **PLDM** – 16 electoral meetings, one concert, one sports competition; **PUN** – 49 electoral meetings, one concert, three press conferences; **PLDM** – 15 electoral meetings; **USB** – four electoral meetings, nine press conferences; **PPR** – nine electoral meetings, eight press conferences, **MSPFN** – seven press conferences, **MPSN** – two press conferences; **MPA** – one press conference.

The artists involved in the concerts organized therein were as follows: Olia Tira, Adriana Ochisanu, Ionel Istrati, Tharmis, “Zdob si Zdub” as well as local artists, Igor Cuciuc (3), Classical Music Quartet, Anatolie Latisev & “Tinerete” Band, Ricky Ardezianu, Costi Burlacu and Corina Tepes, “Stefan Voda” Ensemble, “Chiscareanca” Vocal Ensemble from Chiscareni village, Sangerei. Dance Factory, “Bastina” Ensemble, Maria Stoianov, Merited Artist, Daniela Plesca, Lenuta Alexei, Gheorghe Topa; “Nicolae Botgros” Orchestra of the College of Arts, Doina Arseni and Gabriel Nebunu; “Orheienii” Folklore Ensemble; Iuliana Beregoi, Ionel Istrati (3), Gabriel Nebunu, Victoria Lungu, Adi, Adriana Ochisanu, Adrian Ursu, Costi Burlacu & Corina Tepes, Tharmis, Lupii & Calancea Band, Gheorghita Rotaru, Marian Hatman, Mariana Ichim-Botosani, “Sf. Ioan Iacob” Band from Botosani circuit. Artists of the District Cultural Center; “Lume” Band (4), “Asorti” Band, “Amicii” Band, Carolina Prepelita, musicians from Edinet district – Vasilica Tinei - trumpet and Octavian Babuci - violin, Classical Music Quartet, Anatolie Latisev & “Tinerete” Band, Ricky Ardezianu, Costi Burlacu and Corina Tepes, Anatol Marzenco, Valeriu Neguta, Mariana Sura; Alexandru Lozanciuc, Doinita Gherman, Carolina Prepelita, “Brio Sonores”, Nicolae and Isidor Glib, “Zdob și Zdub”, “Doredos”, Sunstroke Project (4), Nelly Ciobanu (2), artists from Găgăuzia – Polina Stefoglo, Petr Petcovici, Vitali Manjul, “Tozi” Band, Natalia Gordienko, Liliana Prado, Olga Ciolacu, Ian Raiburg, “Doredos”, “Zdob și Zdub”, “Brio Sonores”, “Gandul Matei”, “Noroc” Band, Valentin and Amelia Uzun, Nicu Tarna, dancers from “Black & White” and “Capricio Band” Orchestra, Rodica Aculova, Felicia Tarnav, “Concertino Accordion Band”, Carolina Prepelita, “DoReDos”, “Brio Sonores”, Mihai Budurin (2), Natalia Gordienko, Ilie Maxian, Natalita Olaru, Ionel Istrati, Olga Ciolacu, Olesia Olteanu, Angela Roscovan, “Doredos”, The Puppet Theatre, Lenuța Gheorghita, Laurentiu Popescu, Mihai Ciobanu, Vitalie Toderascu, Cezara, El Radu, Dianna Rotaru, Aura, Alexandru Vdovicenco, Doinita Sulac, Vitalie Dani, Ana Odobesco, Lenuta Burghila, Mihai Budurin, Doina Gherman, Olesia Olteanu, “Doredos”, Liliana Bradu, Brio Sonores, Igor Stribitchi, “Zdob si Zdub”, “Doredos”, Ionel Istrati, Catharsis, Cezara, Ion Suruceanu, Olesia Olteanu, Liliana Prado, Mihai Budurin, Ion Suruceanu; Lenuța Georghita; Mihai Budurin and Liliana Prado, Liliana Prado, Lenuta Gheorghita, Mihai Budurin, Olesia Olteanu, Ion Suruceanu, “Doredos”, Dianna Rotaru, “Sun Stroke Project”, Ady Carp, Vitalie Dani, Doinița Gherman, Aura, Nelly Ciobanu, Lia Taburcean, Olia Tira, “Tharmis”, Vitalie Dani, Natalia Proca, “Zdob si Zdub”, Olia Tira & Lucian Dumitrescu, Adriana Ochisanu; Ionel Istrati; Tharmis; “Zdob și Zdub”, Gheorghe Topa, Costi Burlacu and Corina Tepes (2), A. Latisev, “Doredos”, Igor Cuciuc, “Nicolae Botgros” Orchestra of the College of Arts. Also, at least seven moderators, 33 children animators, two clowns; one DJ, three minions, three mime and pantomime actors, Angy Angel (2) were involved in these concerts/events.

ANNEX 12. Street and mobile advertising reported by observers

According to the findings, in case of the **PSRM**, were seen 219 billboards 2x1 sq. m., 3x6 sq. m., 9x12 sq. m., 108 tents; 218 street banners of the following sizes: 1.5x2.5 sq. m., 2x3 sq. m. and 3x4 sq. m.; 10x14 sq. m.; 52 roll-up banners; 29 LED panels; seven mobile panels, advertising posters on trucks, four consoles.

Referring to the **PPS**, there have been seen 116 street banners, 49 billboards 6x3 sq. m., 2x4 sq. m., 17 tents, eight roll-up banners, four city light panels, two LED panels.

Referring to the **PDM**, the observers have reported 35 billboards 6x3 sq. m., 29 city light panels, 26 street banners.

Referring to the **PN**, the observers have reported 90 billboards 3x6 sq. m., 3.8x4.5 sq. m.; 48 street banners, 54 tents, 10 LED panels.

Referring to **ACUM**, the observers have reported 89 tents, 156 street banners 2x1 sq. m., 80 roll-up banners, four mobile panels, six billboards 3x6 sq. m., two LED panels.

Referring to the **PLDM**, the observers have reported 33 street panels, five billboards 3x6 sq. m., four mobile panels/advertising posters on trucks, two LED panels.

Referring to the **PUN**, the observers have reported 20 street banners 2x1 sq. m., 15 billboards 3x6 sq. m., 14 roll-up banners.

Referring to the **PL**, the observers have reported 12 street banners 2x1 sq. m., two consoles, two roll-up banners.

Referring to the **USB**, the observers have reported 12 street banners 1.75x2.5 sq. m., six roll-up banners, five tents, three billboards 6x3 sq. m.

Referring to the **PPR**, the observers have reported nine roll-up banners, six street banners 2x1 sq. m., one tent, one billboard 6x3 sq. m.

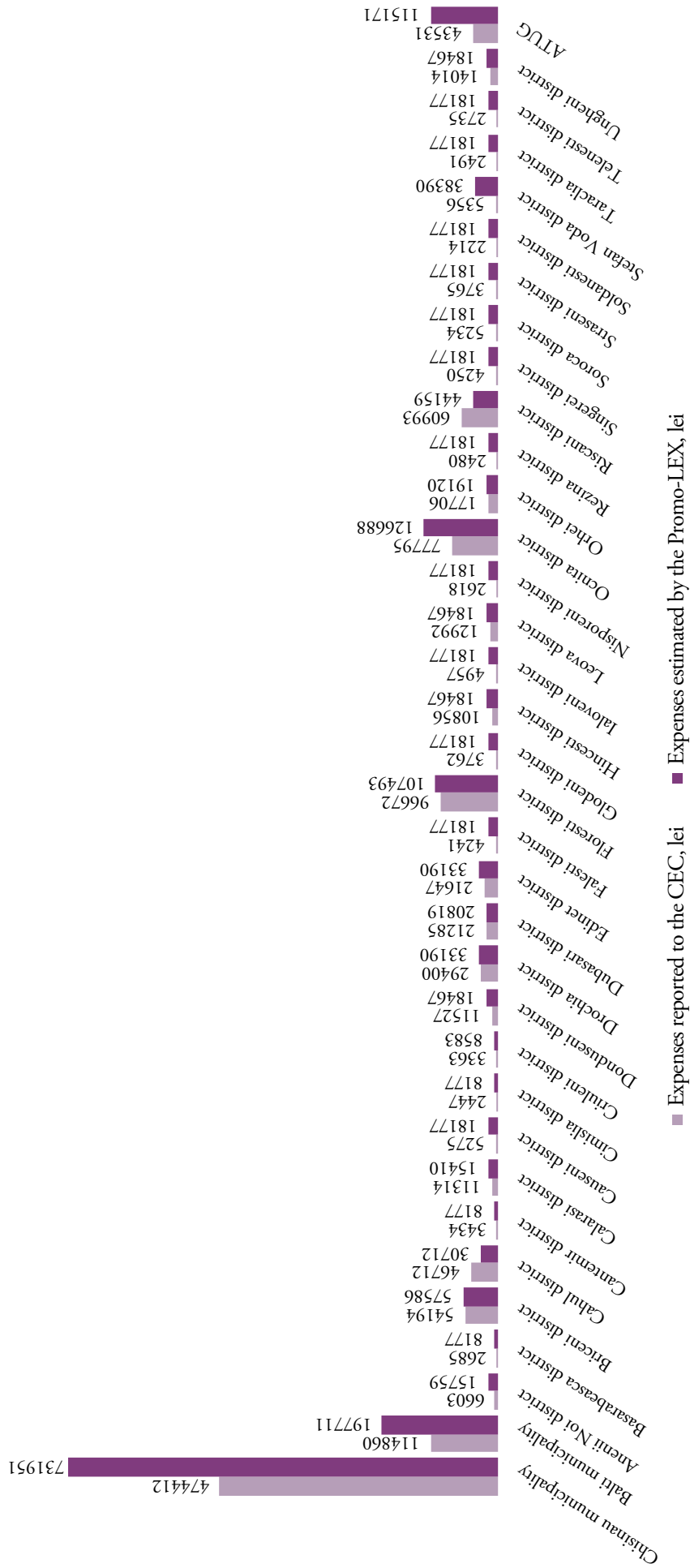
Referring to the **MSPFN**, the observers have reported a LED panel, five billboards 2x3 sq. m.

Referring to the **PCRM**, the observers have reported four street banners 1.8x2 sq. m.

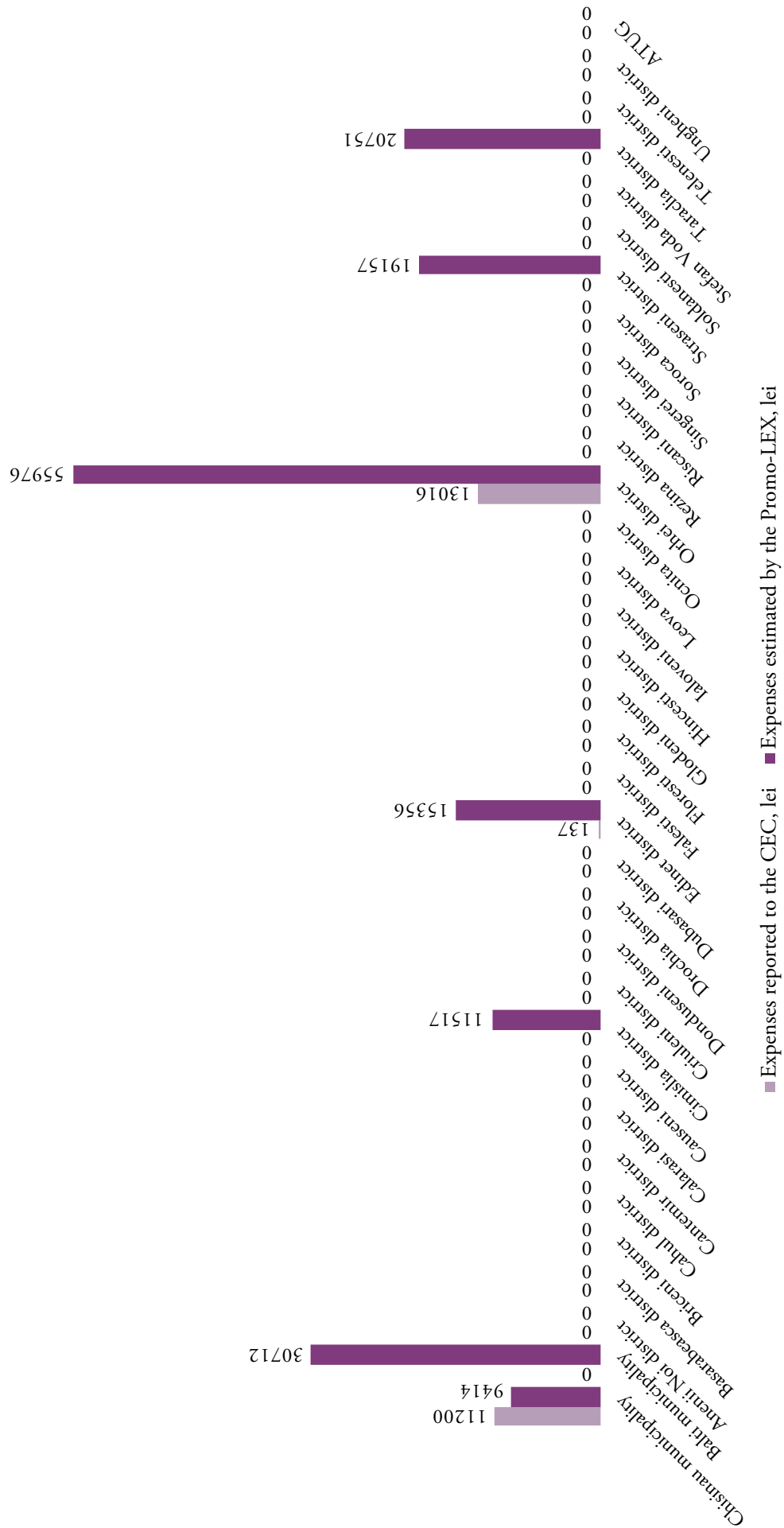
Referring to the **PPEM**, the observers have reported four LED panels, two mobile panels, four billboards 6x3 sq. m., five tents, four street banners.

ANNEX 13. Expenditures of candidates segregated per DEC

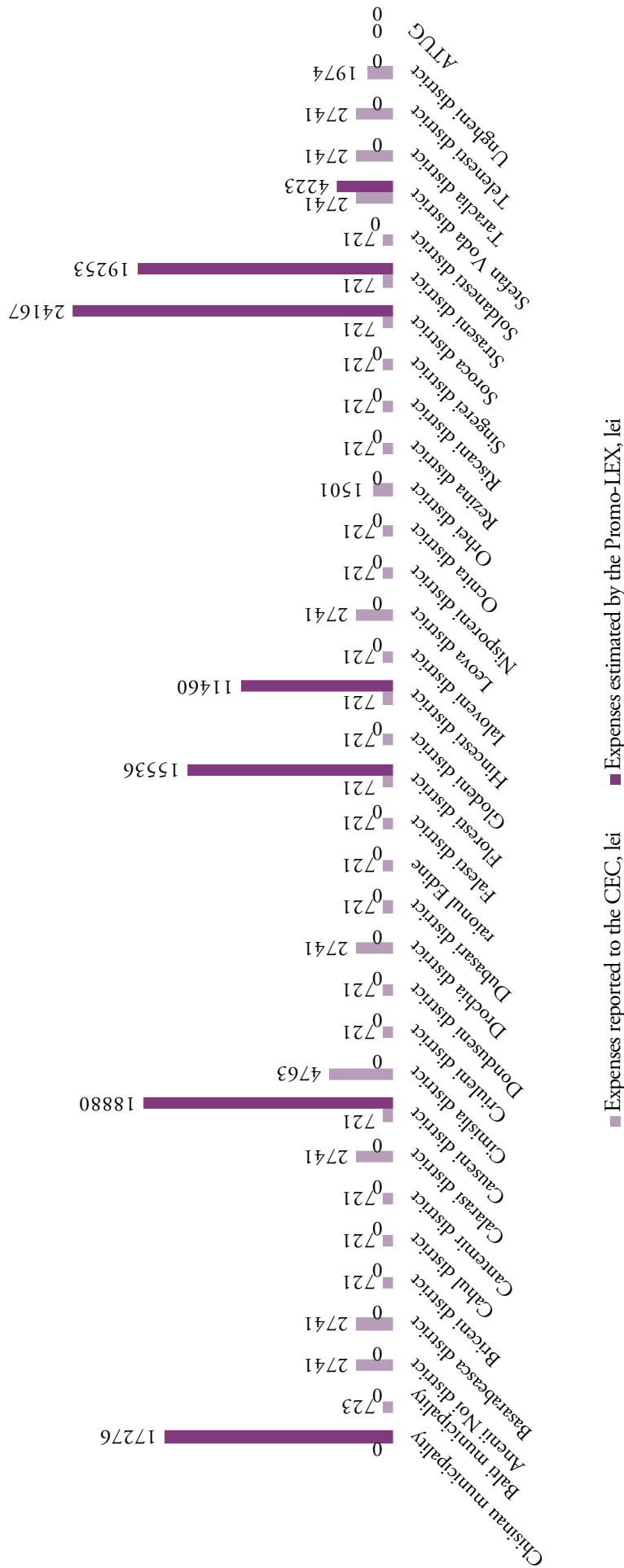
Expenses on public events and demonstrations conducted by the PSRM and segregated per DEC, lei



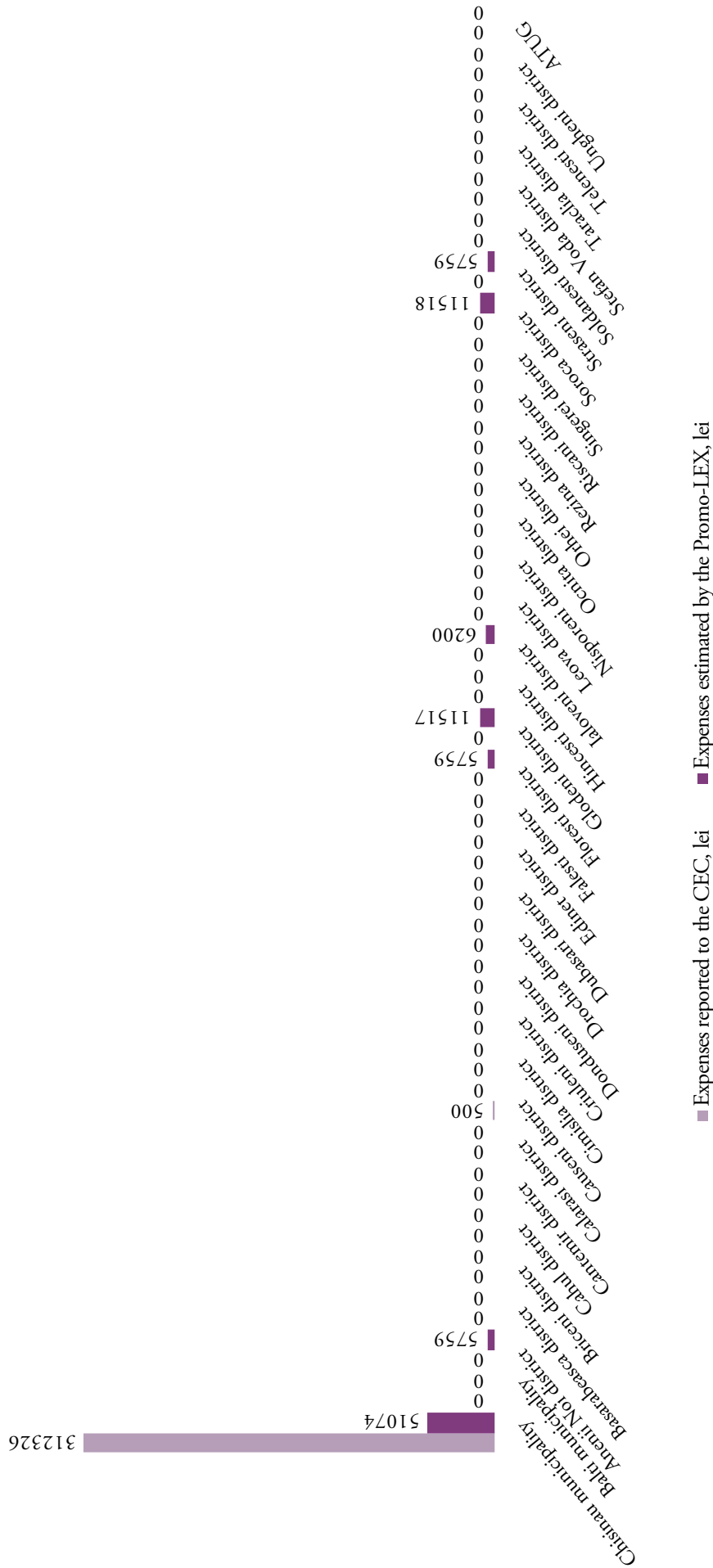
Expenses on public events and demonstrations conducted by the PPS and segregated per DEC, lei



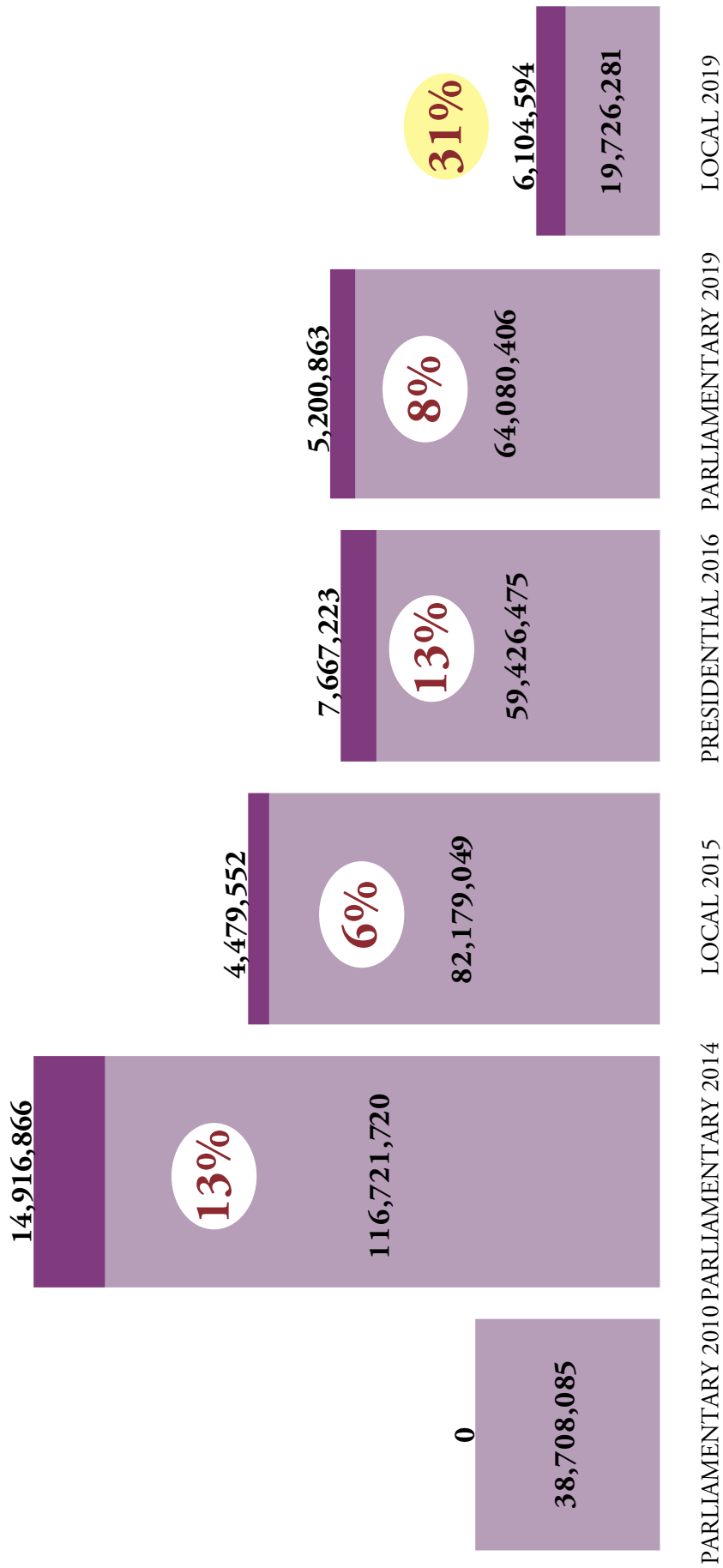
Expenses on public events and demonstrations conducted by the PDM and segregated per DEC, lei



Expenses on public events and demonstrations conducted by the ACUM Bloc and segregated per DEC, lei



Declared expenditures to CEC vs estimated by Promo-LEX (2014-2019), mdl



■ Expenditures reported to CEC, mdl ■ Expenditures estimated by Promo-LEX, mdl

ANNEX 14. Presentation of the information related to the financing of election campaigns at the CEC by political parties

NO.	Political affiliation of candidates	The first candidate registered by the party / electoral bloc / political movement	Submission of reports at the beginning of electoral period ¹³⁴	Date of confirmation of the treasurers by the CEC ¹³⁵	Date of opening of the "Electoral Fund" account	Submission of financial reports within 3 days of opening the "Electoral Fund" account ¹³⁶	Submission of financial statements for week I ¹³⁷	Submission of financial reports for week II ¹³⁸	Submission of financial reports for week III ¹³⁹	Submission of financial reports for week IV ¹⁴⁰	Submission of financial reports for week V ¹⁴¹	Submission of financial reports for week VI ¹⁴²	Submission of financial reports for week VII ¹⁴³	Submission of financial reports for the second round of elections
1.	FSRM	04.09.2019	05.09.2019	05.09.2019	06.09.2019	09.09.2019	13.09.2019	13.09.2019	20.09.2019	27.09.2019	04.10.2019	11.10.2019	18.10.2019	
2.	PPVP	11.09.2019	20.09.2019	27.09.2019	12.09.2019	20.09.2019	21.09.2019	27.09.2019	04.10.2019	11.11.2019	-	-	18.10.2019	
3.	USB	11.09.2019	18.09.2019	13.09.2019	20.09.2019	25.09.2019	27.09.2019	04.10.2019	11.10.2019	-	-	-	18.10.2019	
4.	PPS	06.09.2019	09.09.2019	05.09.2019	04.09.2019	06.09.2019	06.09.2019	13.09.2019	20.09.2019	27.09.2019	04.10.2019	11.10.2019	18.10.2019	
5.	MSPFN	13.09.2019	-	24.09.2019	16.09.2019	21.09.2019	21.09.2019	28.09.2019	04.10.2019	11.10.2019	-	-	18.10.2019	
6.	PSE	18.09.2019	-	27.09.2019	27.09.2019	30.09.2019	30.09.2019	04.10.2019	11.10.2019	-	-	-	18.10.2019	
7.	PN	12.09.2019	17.09.2019	13.09.2019	17.09.2019	20.09.2019	20.09.2019	27.09.2019	04.10.2019	11.10.2019	-	-	18.10.2019	
8.	PPEM	12.09.2019	28.09.2019	17.09.2019	24.09.2019	24.09.2019	28.09.2019	04.10.2019	11.10.2019	-	-	-	18.10.2019	
9.	PDM	10.09.2019	02.09.2019	10.09.2019	11.09.2019	13.09.2019	13.09.2019	20.09.2019	27.09.2019	04.10.2019	11.10.2019	-	18.10.2019	
10.	PPDA	18.09.2019	-	01.10.2019	25.09.2019	27.09.2019	04.10.2019	11.10.2019	-	-	-	-	18.10.2019	
11.	ACUM	PAS	02.10.2019	17.09.2019	18.09.2019	23.09.2019	23.09.2019	28.09.2019	07.10.2019	11.10.2019	-	-	18.10.2019	
		PPDA	12.09.2019											
12.	PLDM	06.09.2019	-	24.09.2019	06.09.2019	10.09.2019	17.09.2019	20.09.2019	27.09.2019	04.10.2019	11.10.2019	-	18.10.2019	
13.	PVE	14.09.2019	04.09.2019	24.09.2019	19.09.2019	25.09.2019	25.09.2019	27.09.2019	04.10.2019	11.10.2019	-	-	18.10.2019	
14.	PUN	11.09.2019	-	24.09.2019	17.09.2019	19.09.2019	20.09.2019	27.09.2019	04.10.2019	11.10.2019	-	-	18.10.2019	
15.	PPR	18.09.2019	-	01.10.2019	25.09.2019	02.10.2019	04.10.2019	11.10.2019	-	-	-	-	18.10.2019	

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134. Official website of the CEC, reports as of the beginning of the electoral period. <https://bit.ly/2m4cUC0>

135. Official website of the CEC, Decisions. <https://bit.ly/2kxaOKs>, <https://bit.ly/2m4XXM76>, <https://bit.ly/2ISExU>, <https://bit.ly/2kIWowD>, <https://bit.ly/2kOwl2z>, <https://bit.ly/2kaY9tB>, <https://bit.ly/2B4hF>, <https://bit.ly/2k65MnY>.

136. Official website of the CEC, reports submitted within 3 days from the opening of "Electoral Fund" account. <https://bit.ly/2kKYaaS>

137. *Ibidem*, <https://bit.ly/2kKYaaS>

138. *Ibidem*, <https://bit.ly/2kKYaaS>

139. *Ibidem*, <https://bit.ly/2kKYaaS>

140. *Ibidem*, <https://bit.ly/2kKYaaS>

141. *Ibidem*, <https://bit.ly/2kKYaaS>

142. *Ibidem*, <https://bit.ly/2kKYaaS>

143. *Ibidem*, <https://bit.ly/2kKYaaS>

16.	PPM	16.09.2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
17.	PNL	13.09.2019	-	24.09.2019	26.09.2019	29.09.2019	04.10.2019	11.10.2019	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
18.	PL	13.09.2019	-	01.10.2019	23.09.2019	27.09.2019	27.09.2019	04.10.2019	11.10.2019	-	-	-	-	-	-	-	-	-	-	18.10.2019
19.	POM	24.09.2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
20.	MPSN	07.09.2019	-	08.10.2019	20.09.2019	-	28.09.2019	04.10.2019	11.10.2019	-	-	-	-	-	-	-	-	-	-	18.10.2019
21	FCRM	06.09.2019	25.09.2019	27.09.2019	24.09.2019	26.09.2019	27.09.2019	04.10.2019	11.10.2019	-	-	-	-	-	-	-	-	-	-	18.10.2019
22	MPA	18.09.2019	26.09.2019	01.10.2019	26.09.2019	27.09.2019	27.09.2019	04.10.2019	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
23	PAD	18.09.2019	-	01.10.2019	30.09.2019	02.10.2019	04.10.2019	11.10.2019	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
24	FSM	18.09.2019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
25	PPRM	16.09.2019	-	27.09.2019	02.10.2019	-	04.10.2019	11.10.2019	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
26	PRSM	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
27	PLD	18.09.2019	-	08.10.2019	-	-	16.10.2019	-	-	-	-	-	-	-	-	-	-	-	-	18.10.2019
Total			11	23	22	20	23	22	16	10	4	2	9							

ANNEX 15. Calculation methodology used to estimate the expenses of electoral competitors found by the Promo-LEX observers and not reflected in the financial reports

a) Expenditure on lease of premises

Calculating the rental costs, the monthly rental price per square meter of space rented for the electoral campaign period (round I and round II) was multiplied by the overall surface of the premises occupied by electoral competitor (party/bloc) in the monitored constituency. Expenses for the related services being added to that amount, estimated by multiplying the monthly minimum tariff for electricity per headquarter - 150 lei, water - 100 lei, gas - 50 lei, at number of headquarters occupied by each competitor and the period of activity of 1 month.

b) Expenditures incurred for delegating or posting of persons (observers nominated by parties, representatives entitled to consultative vote, volunteers/agitators)

When estimating the expenses incurred for delegating the observers and representatives entitled to consultative vote for the election day, as the basis of calculation was taken the hourly minimum guaranteed wage in the real sector multiplied with telephone expenses on the election day (1 SIM card). Thus, the estimates were obtained by multiplying the number of hours worked on the election day (18 h) at the cost per hour (16.42 lei) added to the amount of 50 lei /one SIM card. The estimate of the expenses for volunteers / agitators was 100 lei / person.

d) Transportation costs

The calculation formula used reflects a consumption average of 10 l / 100 km (car), 11 l / 100 km (minibus), 35 l / 100 km (bus) multiplied by the distance traveled and the fuel price of 18.78 lei. In the case of cars, the (minimum) market price of km was considered when estimating the costs.

e) Expenditure on promotional materials

When calculating these expenses, each type of promotional material reported by Promo-LEX observers was multiplied by the estimated minimum market price. According to the reports of the Promo-LEX observers, the monthly minimum price per 1 unit of A3 poster, glossy paper is 2.0 lei for a print run of 50 000 pcs. and 3.0 lei for a print run of up to 5 000 pcs; calendar 10x7 cm², colored paper - 3.5 lei; poster A4, matte paper - 1 lei for a print run of 15 000 pcs; the cost of 1 unit of newspaper A3, colored paper, 4 pages - 2.99 lei for a print run of 10 000 - 50 000 pcs; the cost of a booklet 15x15 cm², colored paper, 6 pages for a print run of 50 000 pcs - 3.25 lei; the cost of a newspaper A3, colored paper, 12 pages - 0.48 lei for a print run of 100 000 pcs; the cost of a booklet 21x20 cm² - 3 lei; the cost of a booklet 15x15 cm² for a print run of 100 000 pcs - 1.5 lei; the cost of a flyer A5 format, glossy paper for a print run of 50 000 pcs - 1.5 lei; of a balloon with message and logo - 1.5 lei; 1 magnet with message and logo - 5 lei; 1 flyer A5 format, matte paper - 1 lei.

f) Expenditure on public events

The expenses incurred on public events include as follows: costs of renting the premises/location in which the event took place, the stage, sound accompaniment, media coverage, artists' fees, expenses on props, etc. When estimating the expenses for electoral events/concerts, it was taken as a basis of calculation the multiplication of each artist's fee (market rate) that evolved for a certain competitor at the de facto time worked. The market price per minute was taken for press conferences.

g) Street and mobile advertising expenses

To estimate the costs for street panels, the market value of the various panel samples was checked. Thus, the minimum monthly price for the placement of a 6x9 m² street panel is at least 6 660 lei, a street panel of 9x12 m² - 10 000 lei, a LED panel - 7 100 lei, street panel - 3x6 m² - at least 5 441 lei, console - 6 718 lei, city light panel - 2 100 lei, street banner 1.5x2 m² - at least 2000 lei, a tent - 1 800 lei, a roll-up banner - 800 lei.

h) Online advertising costs

When estimating the cost of sponsored pages on Facebook, the Promo-LEX EOM multiplied the number of sponsored posts by 6 euros (117 lei) and the number of the days when the advertising appeared. To estimate the cost of online banners, the Mission multiplied the number of online advertising houses holding the above mentioned platforms by the price of 3500 euros / month (68 007 lei).

ANNEX 16. Comparative table on the number of incidents reported by Promo-LEX observers

No.	Type of incident	Presidential Elections 30 October 2016	New Local Elections 20 May 2018 ¹⁴⁴	Parliamentary Elections 24 February 2019	General Local Elections of 20 October 2019 ¹⁴⁵
		Rounds I and II	Rounds I and II		Rounds I and II ¹⁴⁶
1.	Refusal/obstruction of observers to obtain copies of minutes of the vote counting process	0	0	50	9
2.	Restricted access or obstruction of the free observation process in the polling station	26	5	24	11
3.	Ballot boxes were not sealed according to legal procedures / broken/ damaged or missing seals on ballot boxes	27	19	77	29
4.	Lack of the necessary materials in the polling station. At least one of the following materials is missing: voters' lists, ballot papers, round stamp with electoral bureau number, stamps marked as "Voted", "Canceled", special stamp, ballot box seals	0	0	5	0
5.	Unjustified group voting (there are 2 and more people in the voting booth)	0	3	94	27
6.	Unjustified presence of unauthorized persons within the polling station	85	41	50	71
7.	Void ballot papers not distributed to PEB members are not kept securely in the polling station	7	0	2	2
8.	Rumors, attempts, or even material or monetary rewards offered to voters in the perimeter and/or near the polling station to influence voters' choice	17	0	59	16
9.	Electoral campaigning or adverse promotion in the polling station to influence voters' choice	41	23	64	31
10.	Organized transportation of voters (buses, minibuses, or other transport units that would normally not be around the polling station)	61	6	123	26
11.	Unjustified cessation of voting in the polling station	0	0	3	4
12.	Violence or intimidation of voters or other people	41	7	39	18

144. New Local Elections were conducted in the municipalities of Chisinau and Balti, as well as in other five settlements of level I.

145. On 20 October 2019 (first round of local elections) were also conducted new parliamentary elections in four single member constituencies.

146. 757 PSs have been observed in the first round of elections by 41 mobile teams. As for the second round, 307 PSs have been observed by 39 mobile teams.

13.	Deficiencies in the functioning of the SIAS Elections System (suspension of operation, situations when SIAS Elections System indicates that the voter voted, and s/he claims not to)	70	17	61	43
14.	Deficiencies in voters' lists (address discrepancies, deceased voters, signatures instead of others)	32	140	129	69
15.	Photographing of ballot papers, other violations of the secret of voting	100	56	107	35
16.	Damaging ballot papers or other incidents related to misuse	0	0	56	18
17.	Discontinuation of the shooting process during vote counting, other incidents related to shooting of the voting procedures	0	0	79	41
18.	Introducing an unjustified number of ballots into the ballot box	0	0	2	0
19.	Cancellation of ballots before closing the polling stations	1	5	4	7
20.	The presence of advertising materials, posters, electoral panels within the polling station (100 meters from the PS)	56	10	0	59
21.	A suspiciously large number of voters residing at one and the same address vote in the PS	0	0	9	0
22.	Other	118	39	80	47
TOTAL		682	371	1 118	563

ANNEX 17. List of polling stations in which, according to the Promo-LEX EOM, the difference between the first two candidates is smaller than the number of applications submitted for voting at the domicile

District	Village	EC, PS No.	Difference between the first two candidates	Number of applications submitted for voting at the domicile
Basarabeasca	Bascalìa	C05SV011	6	72
Cahul	Andrusul de Jos	C07SV018	12	38
Cantemir	Gotesti	C08SV026	39	39
Cimislìa	Ialpujeni	C11SV028	3	40
Fslesti	Cslinești	C17SV012	5	45
Soroca	Racovat	C29SV046	25	30
Soroca	Bulboci	C29SV018	26	57
Soldănești	Glinjeni	C31SV020	34	38
Stefan Voda	Tudora	C32SV032	46	61
ATUG	Etulia	C36SV060	66	103

Promo - LEX

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