



# **REPORT no. 3**

## **Observation Mission**

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

Monitoring period: 4 - 24 September 2019

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

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## EXECUTIVE SUMMARY

**Legal framework.** The Promo-LEX OM emphasizes the fact that both issuing decisions to lift parliamentary immunity and applying the measure of deprivation of liberty to political exponents, including party leaders holding public positions during the electoral period will affect the voters' perception and the equality of chances in the campaign.

**Electoral bodies.** In addition to the currently approved decisions to regulate the electoral process, the CEC also approved a regulation and amended three other regulations in the electoral campaign.

The CEC received five appeals (four in the general local elections and one in the new parliamentary elections) and three notifications referring to the general local elections. Analysis of the complaints confirms the relevance of the problem previously highlighted by the Mission, in particular, the registration / non-registration of competitors due to the expired mandate of the president of the political formation or due to issues related to the body authorized to nominate election candidates. Additionally, the Promo-LEX OM urges the CEC and DEC's to take a more active role in settling appeals and notifications.

The CEC continues to accredit observers, the number of national observers substantially exceeding the number of international ones. The Promo-LEX Association has 731 accredited observers.

All the 896 ECs of level 1 have been constituted in the due term. 22% of the total of 812 ECs visited by Promo-LEX observers had their headquarters closed during the working hours. Displaying information on the composition of ECs I (43%) and the working program of the EC (74%) was also deficient. About 80% of ECs headquarters are inaccessible or partially accessible for people with special needs.

A total of 1,969 PSs have been set up for the organization and conduct of the general local elections of October 20, 2019. We found no decisions on setting up PSs for the new parliamentary elections in the SMC no. 17 and SMC no. 33. In the case of SMC no. 48 and 50, the Promo-LEX OM agrees with authorities' decision to establish a number of PSs comparable with that in the parliamentary elections of February 24, 2019. Even though public consultations about the opening of PSs abroad have been initiated, we emphasize their belated conduct. In addition, we still find lack of transparency in the distribution of PSs by states and settlements, as well no statistical data that were at the basis of the decision.

**Designation and registration of candidates.** *General local elections.* During the observed period, 2,430 files have been submitted for the positions of mayor in the 896 ECs I. Only 26% of the nominated candidates are women, respectively 74% - men. About 94% of the currently registered candidates have been nominated by 23 parties / electoral bloc and only 6% are independent. Most candidates have been nominated by the PSRM (611), the PDM (435) and ACUM Bloc (367).

Eleven and respectively twenty-one files have been submitted for the position of mayor of municipalities of Balti and Chisinau. Out of the total of 32 files submitted in these two municipalities, only one has been lodged by an independent candidate (Chisinau). Also, only two files have been submitted by women candidates (one for each municipality).

The Promo-LEX OM warns against candidates' registration contrary to the legislation in force. In addition, we are witnessing differentiated approaches which go against the principle of equal opportunities in the case of competitors that committed the same type of infringement, some being registered and others not, provided that the legislation does not provide for sanctioning those already

registered. We refer to two aspects: registration of competitors who did not comply with the gender quota (at least 30 cases – DECs, 195 - ECs I) and registration of candidates based on the designation minutes adopted before the legal term set (at least 6 files have been registered).

*New parliamentary elections.* During the reporting period, of the 41 registered IGs, 25 candidates have already been registered, most of them - 11 - being registered in the SMC no. 50.

**Public administration.** The Promo-LEX OM finds deficiencies in the way LPAs fulfill their tasks to ensure a transparent and fair electoral process. According to the observers, only 77% of the visited LPAs approved decisions on electoral displays and only 64% - adopted decisions to provide the minimum necessary premises for meetings with voters.

Considering the specifics of the local elections, the Promo-LEX OM considers that LPAs, especially those of level II that have webpages, must ensure full publication of information about the candidates in the respective precinct. Out of thirty-two webpages of district public authorities, only five (Calarasi, Cimislia, Criuleni, Floresti and Nisporeni) have a rubric for elections, of which, only three (Cimislia, Floresti and Nisporeni) are adapted to the general local elections of October 20, 2019. Only Floresti LPA has published the decision to establish ECs.

**Electoral competitors.** The number of activities to promote nominated / registered candidates continues to grow, being four times higher than in the previous observation period. At least 158 activities have been reported, most of them being carried out by the PSRM (99), followed by the PPS (19) and ACUM Bloc (9). The most common types of activities are: distribution of informative materials (51) and meetings with citizens (50).

Observers reported at least 4 cases that can be qualified as offering of goods during the electoral period, of which three - in the context of general local elections and one - in that of the new parliamentary elections. Of these, the PN was targeted in two cases (repairs of public facilities), the PPR - in one case (book donation), and the PUN in one case (book donation).

At least 5 cases of misuse of administrative resources have been identified (4 cases – the PSRM, 1 – the PPR). At the same time, candidates are continuously promoting themselves by claiming merits for the projects implemented on public money, at least 8 cases of this kind being identified (7 – the PSRM, 1 – the PLDM). The Promo-LEX OM found at least one situation with the involvement of the President of the Republic of Moldova, Igor Dodon, in promoting the PSRM and its potential candidates in the general local elections.

Additionally, observers reported 4 cases, where the image of personalities from abroad have been used to promote the candidates of PUN, all of them targeting the Romanian politician Traian Basescu.

**Financing of electoral campaigns.** In the period of 6- 20 September 2019, the total amount of revenues declared by 7 competitors registered for the general local elections reached 9,910 132 lei and the amount of expenses reported by 5 of them - 2,487,103 lei; the final balance being - 7,423,029 lei. The major share of declared expenses falls for advertising - 74%, promotional materials - 12%, expenses for meetings and events - 8%, use of transportation- 4%; other expenses - 2%.

The Mission also ascertains failure to report expenses incurred for transportation, rent of permanent offices, including territorial ones, utilities related to the rented premises, expenses for delegation or secondment of persons (including rewards / per diem expenses of the observers and volunteers) by the four electoral competitors that submitted their reports to the CEC – the PSRM, the PPS, the PDM, the PN.

The Mission repeatedly highlights situations reported by Promo-LEX in previous polls, in particular facts that undermine transparency of the financing of general local election campaign. From the Mission's point of view, they can serve as a basis for investigation by the competent bodies. A conclusive example

in this respect is the transfer of 5,59 million lei from the current account of the PSRM to the electoral one, without indicating who de facto made the contribution, or donations ranging from 5 to 15 thousand lei from some pensioners made in favor of the PPS and the PN. We consider it necessary for the CEC to verify the provenance of electoral competitors' sources of revenues. Moreover, the CEC should verify the manner of collecting and recording revenues by primary donors (political groups) be it through cash and control equipment (CCE), or through payment orders, to avoid forgery.

The Promo-LEX OM emphasizes that 12 electoral competitors failed to fully reflect the expenses incurred in the period of 6-20 September 2019, in particular: the PPS, the PSRM, the PDM, the PN, the USB, the MSPFN, the PUN, the MPSN, the MPA, the PCRM, ACUM Bloc, the PSE. Moreover, we found that electoral expenses have been covered by means derived outside the electoral fund account by the PCRM, ACUM, the MSPF, the MPA, the PSE. The total estimated unreported amount reached at least 1,016,303 lei. In the case of the new parliamentary elections, the Promo-LEX OM finds a low degree of transparency in the financing of signature collection activities. Moreover, the financing of electoral campaign, so far, seems to be equally non-transparent, given that only two competitors of the seven registered (the PUN, the PDM) have submitted weekly financial reports to the CEC, mentioning "0" revenues and expenses.

**Hate speech.** Based on the information reported by the monitors, we identified at least five cases in which electoral competitors generated discriminatory messages or other forms of intolerance in the public space, of which: the PL - two cases, ACUM, the PN and the PLDM generated one case each.

On the other hand, the competitor targeted in hate speech is that of the PPS.

Analyzing the situation in terms of criteria underlying hate speech, we noticed that in two cases, gender prejudices and stereotypes were used, and in other two - prejudices related to people's ethnicity. Additionally, we identified a case involving intolerance to LGBT people and to people with mental disabilities, in another situation, incitement to violence was registered.

**Voter education campaigns.** The CEC and CICDE continued their activities to inform voters and train electoral officials. We appreciate the use of sign language in information materials. We consider that voters who will be abroad on the day of election and those residing in the Transnistrian region need more detailed information on the new parliamentary elections. Several categories of civil servants have been trained during the monitoring period, including: members of ECs I, PEB members, operators.

## INTRODUCTION

Report no. 3 has been developed within the framework of the Promo-LEX Observation Mission (OM) of the general local elections of 20 October 2019 and includes the monitoring results covering the period of 4- 24 September 2019. Financing of electoral campaigns has been monitored during the period of 6 - 20 September 2019. The content of this document may be subject to editorial review.

The Promo-LEX OM will present 5 intermediate observation reports and a final report on the conduct of the general local elections/ new parliamentary elections. Additionally, on the Election Day, (for the I and II rounds in the case of local elections) the Association will issue press releases on the conduct of the elections, results of parallel vote-counting and the correctness of protocols filled in. The mission of the reports published by the Promo-LEX OM is to diagnose, in real time, the quality of the organization and conduct of elections for a predetermined period of time; to bring to accountability electoral actors; to identify positive and negative trends in electoral processes. The final report of the OM will be submitted on 19 December 2019.

The Promo-LEX election observation methodology has been developed in line with the international standards in the field and involves both long-term and short-term observation (election day). Monitoring reports are prepared by the central team of the Promo-LEX OM, based on the findings reported by the long-term observers (LTO) within the Mission on the activity of all the actors involved in the process of organizing and conducting the elections: electoral competitors, public authorities, electoral bodies, political parties, citizens submitting their own candidacy, as well as civil society.

Monitoring of the electoral process will be carried out during the electoral period by 41 LTOs. On the election day, Promo-LEX will delegate a short-term observer (STO) to the polling stations (PSs) selected by the Promo-LEX OM based on a sample identified by a sociological company.

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

The report is drawn up based on the observation reports and the findings of LTOs introduced into the thematic templates, as well as on official public information reported by Promo-LEX OM observers. Carrying out some planned visits, the observers analyze the information that results from discussions, meetings with officials and consultation of official documents.

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

The Promo-LEX mission manages the [www.monitor.md](http://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.

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

Promo-LEX is a public association that aims at developing democracy in Moldova, including in the Transnistrian region, by promoting and protecting human rights, monitoring democratic processes and strengthening the civil society. The Association organizes Election Observation Missions in the Republic of Moldova since 2009, the current mission 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, Germany, Georgia, Estonia, Norway, Romania, Sweden, Ukraine etc.

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

The report is prepared with the financial support of the United States Agency for International Development (USAID) through the "Democracy, Transparency and Accountability" Program and the Soros-Moldova Foundation through the project "Consolidating a Platform for the Development of Human Rights Activism and Education in the Republic of Moldova".

The opinions expressed in the public reports and press releases of the Promo-LEX MO belong to the authors and do not necessarily reflect the views of the financiers.



## I. LEGAL FRAMEWORK

*The Promo-LEX OM emphasizes the fact that both issuing decisions to lift parliamentary immunity and applying the measure of deprivation of liberty to political exponents, including party leaders holding public positions during the electoral period will affect voters' perception and equality of chances in the campaign.*

### **1.1. Issuing decisions to lift the parliamentary immunity of some MPs who are running in the general local elections or are directly involved in the process of candidate nomination**

During the monitored period, the Parliament of the Republic of Moldova approved decisions to lift the parliamentary immunity of Marina Tauber (PPS)<sup>2</sup>, Reghina Apostolova (PPS)<sup>3</sup>, Vladimir Cebotari (PDM)<sup>4</sup> and Petru Jardan (PPS)<sup>5</sup>.

On 18 September, by the decision of EC no. 25 Orhei, Marina Tauber and Reghina Apostolova, appointed by the PPS, were included on the list of candidates for the position of councilor in the Orhei District Council.

On 19 September, Vladimir Cebotari submitted the file to EC no. 1 Chisinau for his registration as a candidate for the position of general mayor of the municipality of Chisinau, being nominated by the PDM.

By the Decision no. 58 of 20 September 2019, issued by EC no. 1 Chisinau, Petru Jardan<sup>6</sup>, designated by the PPS, was included on the list of candidates for the position of councilor in the Chisinau Municipal Council.

Making no reference to the indispensability in terms of time and reasonableness of the criminal investigation measures carried out and applied, *the Promo-LEX OM emphasizes the fact that both issuing decisions to lift parliamentary immunity and applying the measure of deprivation of liberty to political exponents, including party leaders holding public positions during the electoral period will affect the voters' perception and the equality of chances in the campaign.* Thus, the Promo-LEX OM mentions that such actions can be qualified as misuse of administrative resources (legal instruments) that favor the political formations of the parliamentary majority and disadvantage the political formations in the opposition during electoral campaign.

At the same time, problematic situations that might affect the decision-making process within the parties that have nominated candidates and, respectively, are involved in the elections may emerge. In the case of the PPS, pursuant to art. 35, para. (6) of the Party Charter, in the event of the impossibility of the Party President to exercise its powers, the Vice-President is to fulfil its duties. However, according to the website of the PPS, the formation has only one vice-president - Marina Tauber<sup>7</sup>.

The Promo-LEX OM reminds electoral competitors<sup>8</sup> of the fact that the right to modify the list of candidates for the position of councilor has to be applied in good faith, it also emphasizes that pursuant to art. 51, para. (4) of the Electoral Code, political formations should guarantee that during the electoral period, the nominated candidates will not be held criminally liable, arrested, detained or subject to administrative sanctions, without the consent of electoral body.

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<sup>2</sup> Parliament Decision no. 126 of 16.09.2019.

<sup>3</sup> Parliament Decision no. 127 of 16.09.2019.

<sup>4</sup> Parliament Decision no. 130 of 19.09.2019.

<sup>5</sup> Parliament Decision no. 133 of 20.09.2019.

<sup>6</sup> <https://bit.ly/2miROzL>

<sup>7</sup> To find out more details about the detention of party members, as well as following the wish to clarify the impact of the detentions on the electoral activity of the PPS, the Promo-LEX OM requested a meeting with Mr. Denis Ulanov, member of the parliament representing the PPS faction in the Parliament. However, by the time this report was published, we received no response.

<sup>8</sup> At least five MPs from seven members of the PPS faction are on the lists of district councilors.

## **1.2. Applying legal provisions that allow for the verification of voters' lists**

On September 13, 2019, the CEC approved Decision no. 2684, by which it amended the Regulation on the preparation, administration, distribution and updating of the voters' lists. The modifications made aim at adjusting the provisions of the regulation with the provisions of the Electoral Code that stipulate that *representatives of electoral competitors are granted the right to verify the voters' lists and, respectively, to submit appeals with regard to them*. Voters' lists that are made accessible indicate the name, surname and year of birth of each voter.

The Promo-LEX OM welcomes the approval of the amendments to the legal framework aimed at ensuring a mechanism for checking and updating voters' lists. At the same time, *the Promo-LEX OM warns about the dual nature of the legal norms applicable to the general local elections and new parliamentary elections, since neither the provisions of Electoral Code nor the changes made to this regulation apply to the new parliamentary elections, which will be held prior to the expiration of the mandate of the Parliament of the 10th legislature*.

Thus, we are in the situation when the representative of an electoral competitor in the local elections has the right to verify the correctness of voters' lists and, respectively, to file appeals, while a representative of an electoral competitor in the new parliamentary elections does not have this right. We believe that this situation could disorient both electoral competitors and voters.

## II. ELECTORAL BODIES

*In addition to the currently approved decisions to regulate the electoral process, the CEC also approved a regulation and amended three other regulations in the electoral campaign.*

*The CEC received five appeals (four in the general local elections and one in the new parliamentary elections) and three notifications referring to the general local elections. Analysis of the complaints confirms the relevance of the problem previously highlighted by the Mission, in particular, the registration / non-registration of competitors due to the expired mandate of the president of the political formation or due to issues related to the body authorized to nominate election candidates. Additionally, the Promo-LEX OM urges the CEC and DECs to take a more active role in settling appeals and notifications.*

*The CEC continues to accredit observers, the number of national observers substantially exceeding the number of international ones. The Promo-LEX Association has 731 accredited observers.*

*All the 896 ECs of level 1 have been constituted in the due term. 22% of the total of 812 ECs visited by Promo-LEX observers had their headquarters closed during the working hours. Displaying information on the composition of ECs I (43%) and the working program of the EC (74%) was also deficient. About 80% of ECs headquarters are inaccessible or partially accessible for people with special needs.*

*A total of 1,969 PSs have been set up for the organization and conduct of the general local elections of October 20, 2019. We found no decisions on setting up PSs for the new parliamentary elections in the SMC no. 17 and SMC no. 33. In the case of SMC no. 48 and 50, the Promo-LEX OM agrees with authorities' decision to establish a number of PSs comparable with that in the parliamentary elections of February 24, 2019. Even though public consultations about the opening of PSs abroad have been initiated, we emphasize their belated conduct. In addition, we still find lack of transparency in the distribution of PSs by states and settlements, as well no statistical data that were at the basis of the decision.*

### 2.1 The activity of the CEC

#### 2.1.1. Decisions relevant to the organization and conduct of elections

**In the context of the general local elections**, the CEC adopted 18 decisions with regard to: modification of some decisions on the temporary workplace relief and on modification of the membership of some of the DECs; approval of the registration request filed by ACUM (Platform DA and PAS) electoral bloc; confirmation of the persons in charge of finance in both general local elections and new parliamentary elections appointed by the PPS, the USB, the PLDM, ACUM electoral bloc, the PUN, the PVE and the MSPFN; resolution of an appeal filed by the PSRM with the CEC<sup>9</sup>; approval of the ballot papers for the general local elections of October 20, 2019; confirmation of the persons holding the right of consultative vote and of the persons responsible for finance appointed by the PSRM, the PDM, the PN, the PPEM and the MSPFN. At the same time, the CEC has approved 28 decisions to modify the composition of several DECs.

**In the context of the new parliamentary elections**, the CEC adopted nine decisions with regard to: modification of the decisions on the list of parties and other socio-political organizations with the right to participate in the new parliamentary elections<sup>10</sup>; organization of PSs for the voters in the settlements located in the Transnistrian region and the establishment of PSs for the new parliamentary elections abroad; modifications of the decision on temporary workplace relief and summoning of some members of SMC no. 33; approval of the ballot paper model; establishing the circulation of the ballot papers in the

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<sup>9</sup> CEC Decision no. 2703 of 17.09.2019. <https://bit.ly/2mnfCIX>

<sup>10</sup> According to them, the former Liberal Reformist Party will participate in the new parliamentary elections of October 20, 2019 under the name of Romanian Popular Party; the former Political Party for the Unification of Moldova will participate in the new parliamentary elections of October 20, 2019 under the name of the Party of Working People.

new parliamentary elections of October 20, 2019 for the polling stations in SMC no. 48 and no. 50; amending the composition of SMC councils no. 33 and no. 48.

### **2.1.2. Appeals and notifications**

*Five appeals have been lodged with the CEC (four in the general local elections and one in the new parliamentary elections) and three notifications with regard to the general local elections.*

*Analyzing the profile of appeal lodgers, we found that they have been submitted by representatives of political parties (the PSRM - 1, the PLDM - 1, the MPSN - 2) and by a voter challenging the actions/inactions of the EC<sup>11</sup> and the documents issued by it<sup>12</sup>.*

*Analyzing the subject matter of appeals, we emphasize that three out of five target the registration/ non-registration of electoral competitors due to the expiration of the mandate of the president of the political formation (the PLR) or of the body empowered to nominate candidates (the MSPFN), thus invoking the nullity of the minutes on candidates' designation. We also mention that there is a request to refuse the registration of the candidates of a political party due to the expiration of the mandate of its body authorized to nominate election candidates. The CEC has expressed its opinion with regard to three appeals (1 - in parliamentary elections, 2 - in general local elections), as well as to the request / notification, claiming that the problem of party internal documents (their legality) is beyond the competence of electoral body and is to be settled in court. Also, the CEC made reference to the principle of continuity in exercising responsibilities by the authorized persons reflected in art. 197, para. (2), let. b) of the Decision of the Constitutional Court no. 16 of 17 June 2015 and in art. 197, para. (2), let. b) of the Civil Code.*

*We consider that the **CEC and ECs must take an active role in resolving appeals and notifications/referrals**, especially when reference is made to the potential invalidity of the act of nominating candidates in elections and, consequently, to invalidity of the registration of electoral competitor. The position adopted by the Commission is incomprehensible, considering that the Public Service Agency provides the CEC with an updated list of political parties in the Republic of Moldova, including **information on the validity of the mandates of the presidents of political parties**, and by letter no. 05 / 01-2927 of 09 September 2019<sup>13</sup>, it undertook, to present, in a priority manner, copies of the charters of political formations in case appeals involving the statutory provisions of any political party are lodged with the CEC. Thus, we consider that the CEC has sufficient information and legal mechanisms that allow it to conclude on the validity of the acts presented by political parties, especially during the electoral period.*

*We draw the readers' attention to different terms for solving the notification / referral compared to the appeals with the same subject matter - registration of an electoral competitor due to the expiry of the mandate: the notification/ referral was resolved within six days, and an appeal - within three days, two appeals - within two days. We consider it is necessary to clarify the legal status of referrals / notifications / requests filed in the electoral period, the terms and the manner of their settlement. As for the term for settlement of the appeals, we mention that three were settled within the terms provided by the legislation in force, and two - with a delay of one day.*

*Analyzing the decisions taken on the appeals, the CEC expressed its position in a decision to admit the appeal and four letters (1 - to refer the appeal to the competent authority; 3 - to reject the appeals).*

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<sup>11</sup> DEC no. 12 Criuleni (1), DEC no. 1 Chisinau (2), SMCC no. 50, no. 17, no. 33 (1).

<sup>12</sup> DEC no. 10 Causeni.

<sup>13</sup> <https://bit.ly/2mi5Mlz>

*In addition*, we mention that an appeal targeted the publication on social networks of personal data from the list of candidates for the position of councilor<sup>14</sup>, which was referred to the competence of the National Center for Protection of Personal Data.

Another notification, filed by the representative of a local public authority, targeted electoral campaigning activities carried out by a political party before the start of election campaign, requesting that these violations be taken into account and that the political party be excluded from electoral race<sup>15</sup>.

### **2.1.3. The Promo-LEX request**

On September 12, 2019 the Promo-LEX OM sent to the CEC a request to clarify, if necessary, by publishing a circular letter, some important aspects for the proper conduct of electoral procedures. ***The Mission pointed out that a prompt response will allow for the correct and timely training of Promo-LEX observers.***

First, the Mission referred to the need to clarify the way of applying the provisions of art. 60, para. (7) of the Electoral Code, which states that "on the election day, the responsibility for ensuring public order in the polling station and within 100 meters of the precinct, is carried out by the president of the PEB. The decisions taken in this respect are enforceable for all", in the following situations:

- *removing campaigning materials, posters, electoral displays from the precinct of the polling station.* Promo-LEX requested the CEC to provide through its acts for the express obligation of the PEB to remove electoral displays within 100 m of the PS on the election day and the one preceding it;
- *unjustified presence of unauthorized persons in the precinct of the polling station.* In the opinion of the Promo-LEX OM, apart from authorized persons (electoral officials, representatives and observers of electoral competitors, observers, as well as media representatives), nobody has the right to be in the PS and within 100 m of the polling station. Voters can spend in the polling station as much time as it takes them to vote. According to its monitoring reports<sup>16</sup>, the Promo-LEX OM found multiple cases of unjustified presence of MPs, candidates and other categories of unauthorized persons in the immediate vicinity of the polling station, or at its entrance and inside the PS on the election day.

Second, the Mission requested predictability with regard to applying the provisions of art. 58, para. (2), let. c) of Electoral Code, which stipulates that voters who do not have a registered domicile or residence are included on additional lists. The Promo-LEX OM emphasizes that considering the changes made by the CEC in the Regulation on the preparation, administration, dissemination and updating of voters' lists on 03.07.18, as well as based on the inconsistent practice of interpreting the norms of Electoral Code through circular letters, issued by the electoral authority in 2015 (general local elections) and 2018 (new local elections), voters without a domicile and those without residence risk not participating in the elections of October 20, 2019.

By September 24, 2019, the Promo-LEX OM has not received a response to the request. Likewise, no answer was identified on the website of the authority.

### **2.1.4. Accreditation of observers**

***Accreditation of national observers.*** To observe the general local elections and the new parliamentary elections of October 20, 2019, during the monitoring period, the CEC accredited 663 persons nominated by the Promo-LEX Association and 14 persons nominated by the Association "Representation of the National Democratic Institute of the USA in Moldova". In total, up to the date of publication of this report,

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<sup>14</sup> <https://bit.ly/2mLOBKZ>

<sup>15</sup> <https://bit.ly/2mi0vdE>

<sup>16</sup> Report no. 6. Promo-LEX observation mission for the new local elections of May 20, 2018, p. 8. <http://bit.ly/2kgM9cX>

the Promo-LEX Association accredited 731 persons as national observers for the general local elections and the new parliamentary elections of October 20, 2019.

In order to *observe the general local elections*, the CEC accredited ten persons representing the Public Association "East-European Foundation of Moldova".

**Accreditation of international observers.** To *observe the general local elections and the new parliamentary elections of October 20, 2019*, the CEC has accredited four persons from the Embassy of the French Republic.

In order to *observe the general local elections*, the CEC accredited: two persons from the Public Association "Representation of the National Democratic Institute of the USA in Moldova"; 13 persons from the Embassy of the Russian Federation in the Republic of Moldova; a person from the Hungarian Embassy in the Republic of Moldova.

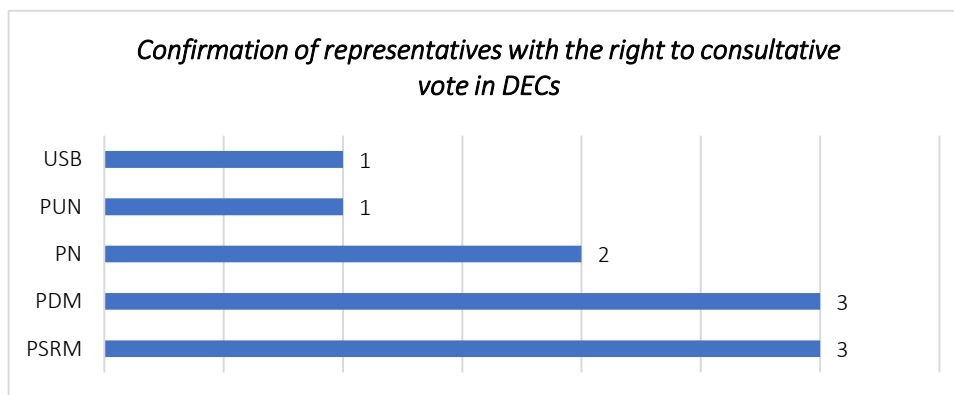
*Accreditation of international electoral experts.* To *observe the general local elections and the new parliamentary elections of October 20, 2019*, the CEC has accredited two persons from the Central Election Commissions of Belarus, Lithuania, Estonia and Croatia.

## 2.2 The activity of DECs

### 2.1.5. Confirmation of representatives with the right to consultative vote and registration of trusted persons

Electoral competitors that have the largest number of representatives with the right to consultative vote are the PSRM and the PDM, with at least three persons each, in different DECs (see chart no. 1).

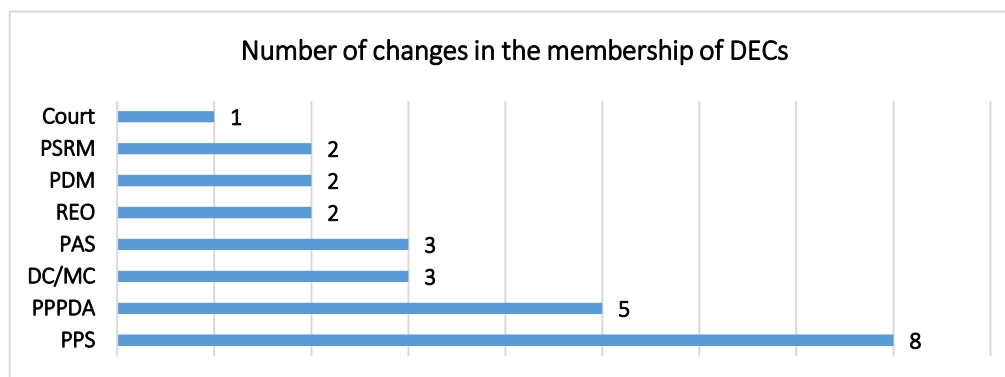
Chart no. 1



During the observation period, three electoral competitors – the PCRM, the PDM and the PLDM - registered a trusted person in three DECs.

### 2.1.6. Modification of DEC membership

During the observation period, the CEC adopted 28 decisions on the modification of DEC membership, based on the applications received from the entities holding the right to designate members (see chart no. 2). The largest number of changes was requested by the PPS (8 cases), followed by the PPDA (5 cases).



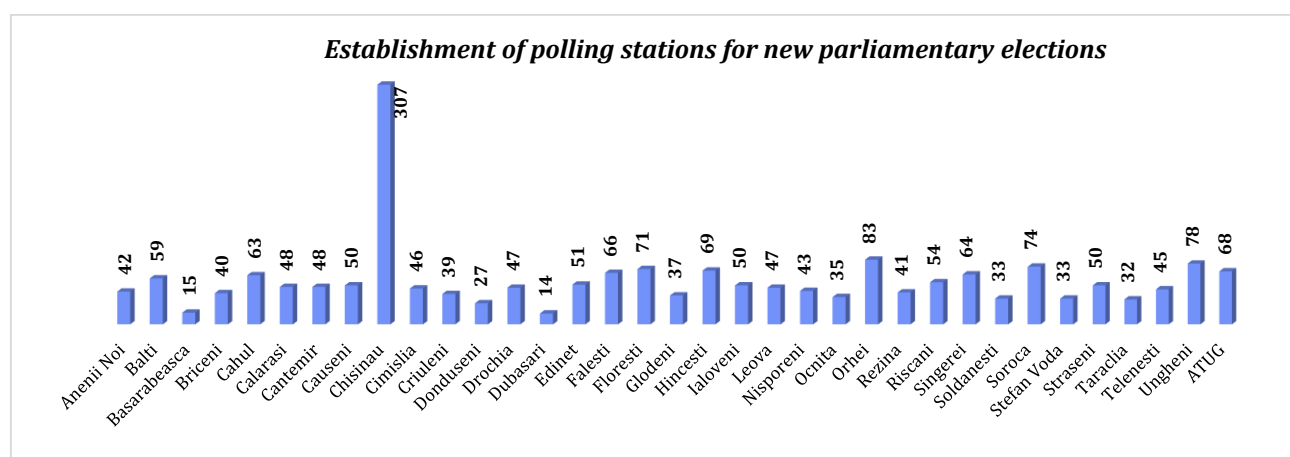
### 2.1.7. Modification of SMCC composition for new parliamentary elections

During the monitored period, the CEC ordered the modification of the membership of SMC council no. 33, where the replacement of a member from the PSRM was requested, as well as the composition of SMC council no. 48 by replacing a member of the PPPDA.

### 2.1.8. Establishment of polling stations

**Establishment of polling stations for general local elections.** According to art. 30, para. (2) of Electoral Code<sup>17</sup>, as well as according to the provisions of the CEC Calendar Program<sup>18</sup>, the deadline for setting up polling stations was set for September 14, 2019. According to the information provided by the Promo-LEX observers, the **deadline for setting up polling stations was respected in the case of all 35 DEC's**.

Thus, we find that for the organization and conduct of the general local elections of October 20, 2019, **1,969 PSs** have been established, most of them in the municipality of Chisinau (307), as well as in the districts of Orhei (83) and Ungheni (78) (see chart no. 3).



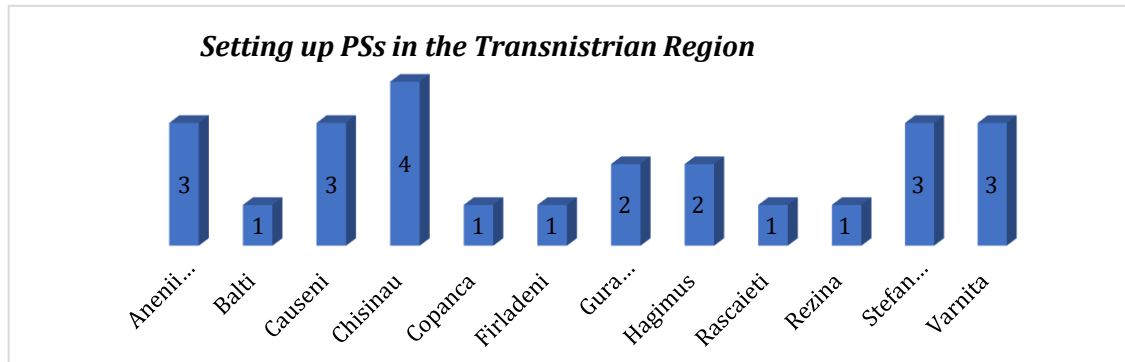
<sup>17</sup> Article 30, para. (2) of Electoral Code: "The polling stations shall be constituted by the district electoral councils in the settlements, based on the proposals of mayors of cities (municipalities), sectors and villages (communes), at least 35 days before the election date, and they will comprise at least 30 and at most 3000 voters". <https://bit.ly/2leuGln>

<sup>18</sup> The calendar program for organizing and conducting the general local elections of October 20, 2019, approved by the CEC Decision no. 2551 of 31.07.2019. <https://bit.ly/2ISG1b6>

**Establishment of polling stations for the new parliamentary elections.** Similar to general local elections, the deadline for setting up polling stations for the new parliamentary elections of October 20, 2019 was September 14, 2019. Only in the case of electoral councils of SMC no. 48 and no. 50 the Mission identified decisions on the establishment of polling stations (in legal terms), whereas in the case of the SMC no. 17 and no. 33 they, according to observers' findings, are missing.

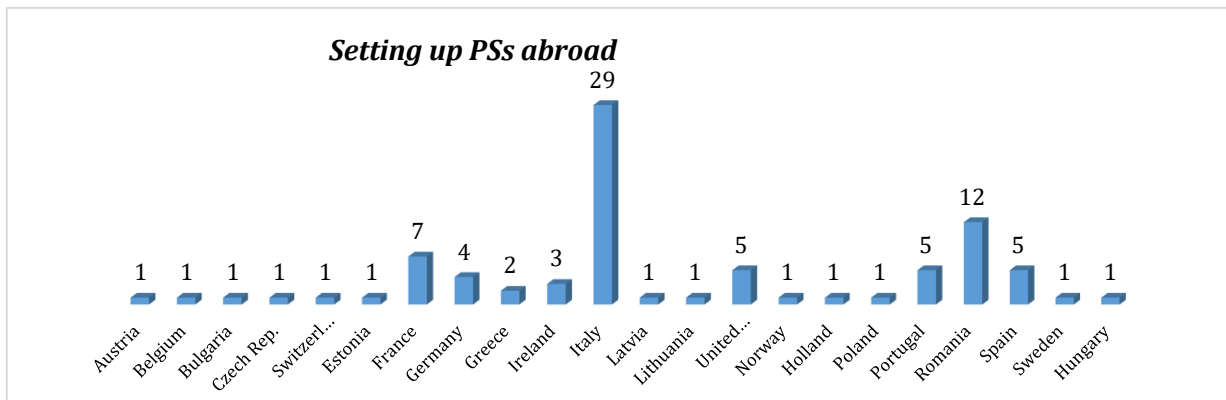
Thus, in the case of electoral council of SMC no. 48, twenty-five PSs were set up<sup>19</sup> (see chart no. 4). Compared to the parliamentary elections of February 24, 2019, their number has not changed. However, we note that the geographical location of polling stations has been modified, excluding regions that are far from the crossing points (Calarasi, Cahul) and the number of PSs in the regions near to the crossing points has been increased. This will facilitate the voters' access to the polling stations (only if, like in the previous elections, the CEC will not decide to relocate them)<sup>20</sup>.

Chart no. 4



In the case of electoral council in the SMC no. 50, according to the legal provisions<sup>21</sup> and pursuant to the Government Decision no. 445 of 13 September 13, 2019,<sup>22</sup> the CEC Decision no. 2696 of September 14, 2019<sup>23</sup>, the establishment of 85 PSs abroad was approved (see chart no. 5).

Chart no. 5



<sup>19</sup> <https://bit.ly/2leWFSn>

<sup>20</sup> Report no. 5. Observation Mission for the parliamentary elections of February 24, 2019, p. 17. <https://bit.ly/2OkcfX0>

<sup>21</sup> Article 31 of the Electoral Code (applicable to parliamentary elections). <https://bit.ly/2TUFa9q>

<sup>22</sup> Government Decision no. 445 of September 13, 2019 regarding the organization of polling stations abroad. <https://bit.ly/2mjL44D>

<sup>23</sup> CEC Decision no. 2696 of September 14, 2019 regarding the organization of polling stations abroad for the new parliamentary elections of October 20, 2019, in the single member constituency no. 50, west of the Republic of Moldova. <https://bit.ly/2metILS>



Thus, we find that most PSs have been set up in Italy (29), Romania (12) and France (7). Compared to the previous elections, we appreciate the increase in the number of PSs in the United Kingdom (from 4 to 5), Ireland (from 2 to 3) and Germany (from 2 to 4).

Promo-LEX draws the readers' attention to the fact that the Diaspora Relations Office made an attempt to submit to public consultations the number and location of polling stations expected to be constituted in SMC no. 50, which must be appreciated. At the same time, we emphasize that the invitation to participate in the public consultation was addressed only to the representatives of the diaspora. Even so, Promo-LEX has made its recommendations. In the opinion submitted, we emphasized the lack of fixed terms for sending answers, given that the stakeholders had only 2-3 days to react, the lack of fixed terms in the announcement seriously affected the efficiency and credibility of public consultations.

Promo-LEX made four recommendations on the increase of the number of PSs in Germany (from 2 to 5)<sup>24</sup>, Belgium (from 1 to 2), opening of a PS in Denmark and reopening one in Norway. The Government decision on the organization of polling stations abroad mentioned reopening of the PS in Norway. In this context, the Promo-LEX OM also notes the lack of transparency in reflecting the mechanisms of PS distribution under the legal provisions. It is unclear how they came to this distribution of PSs. Also, the data used by the government, such as the number of pre-registrations (CEC) and the official data of the Ministry of Foreign Affairs and European Integration of the Republic of Moldova are not published. We believe that in the future, the CEC will have to show greater openness and transparency in the process of organizing the PSs abroad.

In the case of SMC no. 17 and no. 33, contrary to the provisions of the CEC Calendar Program<sup>25</sup>, no decisions on the constitution of PSs have been approved. In the opinion of Promo-LEX, the same PSs will operate both in the case of general local elections and in that of the new parliamentary elections. However, we consider that to ensure clarity in the organization of elections, the SMC electoral councils should have approved decisions that would indicate the polling stations in which new parliamentary elections will be held on October 20, 2019 - which means ensuring PSs with ballot papers, documentation for the new parliamentary elections, systematic reporting to the SMC, etc.

In the context of the above, we mention that electoral councils of the SMC no. 17 set up 50 PSs for the parliamentary elections of February 24, 2019 (Nisporeni District - 43 PSs and Straseni District - 7 PSs), and in the case of SMC no. 33 - twenty-seven PSs were set up in the five settlements of the municipality of Chisinau, which will elect their mayors and councilors on 20 October (Codru, Durlesti, Bacioi, Sangera, Trusenii).

### ***2.1.9. Appeals and notifications***

According to the Promo-LEX observers, four appeals were filed with the DECAs during the reference period (3 - EC no. 28 Singerei; 1 - EC no. 27 Riscani) and six referrals/ notifications.

*Analyzing the profile of appeal lodgers*, we found that most of the appeals were submitted by the electoral competitors designated by the PSRM (2), ACUM Bloc (1) and 1 by an independent candidate.

*Analyzing the subject matter of appeals*, we found that the majority of them targeted the actions / inactions of lower electoral bodies and the acts issued by them (EC no. 28/25, EC no. 28/21, EC no. 27/19). One of the appeals was withdrawn by the appellant.

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<sup>24</sup> The document offered for public consultations foresaw for Germany an increase from 2 to 4 polling stations. Subsequently, through Government Decision, 4 PSs were established.

<sup>25</sup> The calendar program for the organization and conduct of the new parliamentary elections of October 20, 2019. <https://bit.ly/2lgIDRI>.

*Notifications/ referrals* were field with EC no. 1 Chisinau (3), EC no. 11 Cimisia (1), EC no. 19 Glodeni (1), EC no. 28 Singerei (1). The notifications were submitted by the representatives of political parties (the PL - 2, the USB - 1, the PPDA - 1, the PPS - 1) and representatives of the local public authority, targeting the actions of electoral competitors, including those of the candidates for mayoral offices (the PSRM - 2, ACUM Bloc - 1, IC - 1) and the actions and acts issued by the lower electoral bodies (EC no. 28/25, EC no. 19/13).

*The notifications/ referrals concerned* alleged illegal conduct of electoral campaigning activities<sup>26</sup> (2), misuse of administrative resources when collecting signatures (1) and in the electoral campaign (1), registration / non-registration of electoral competitors, election of the president of EC. Electoral authorities issued three letters declining the referrals due to the fact that the subjects of referrals were not within their competence.

Having examined the manner in which appeals and notifications/ referrals have been solved by DEC's, the Promo-LEX OM points out that **DECs must take an active role in solving notifications and appeals and apply all the legal instruments made available to them by the legislator** to ensure the good conduct of the elections under equal conditions. A norm must be interpreted in the sense it allows for application, not in the sense its application is excluded.

## 2.2. The activity of Electoral Councils

According to the CEC calendar program and legal provisions<sup>27</sup>, by September 4, 2019 inclusively, DEC's shall constitute level I electoral constituencies, and up to September 9, 2019 electoral councils of level I (EC).

According to the decisions published on the official page of the CEC, 896 level I electoral constituencies and electoral councils have been set up. We appreciate the fact that the deadlines for setting up, both level I electoral constituencies and councils have been respected in all cases.

### 2.3.1. Composition of Electoral Councils

An electoral council shall consist of an odd number of members, of at least 7 and at most 11 persons, of which two members are nominated by the first level local council (city / town, village / commune) and one member by the parties represented in the Parliament<sup>28</sup>. If the parties do not nominate their candidacies to the council, the required number of applications is completed by the local council or by the People's Assembly of Gagauzia, and if they do not submit the candidacies, the vacancy in the electoral council is filled by the CEC from the Register of Electoral Officials.

Having examined the information published on the official website of the CEC and according to the data collected by the Promo-LEX observers, we generally find compliance with the legal provisions in this regard. Chart no. 6 presents the information on the appointment of members by each entity holding this right. Please note that the information is incomplete as the webpage of DEC's do not contain decisions on setting up electoral councils of level I.

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<sup>26</sup> Carrying out electoral campaigning activities with the involvement of minors, carrying out electoral campaigning before candidate's' registration by the electoral body.

<sup>27</sup> The calendar program for the organization and conduct of the general local elections of 20.10.2019 and art. 28, para. (4), 29, 131, para. (1) and 132 of the Electoral Code of the Republic of Moldova.

<sup>28</sup> Para 7, para. (3), let. b) of the Regulation on the activity of district electoral council. <https://bit.ly/21R5p0s>

Chart no. 6

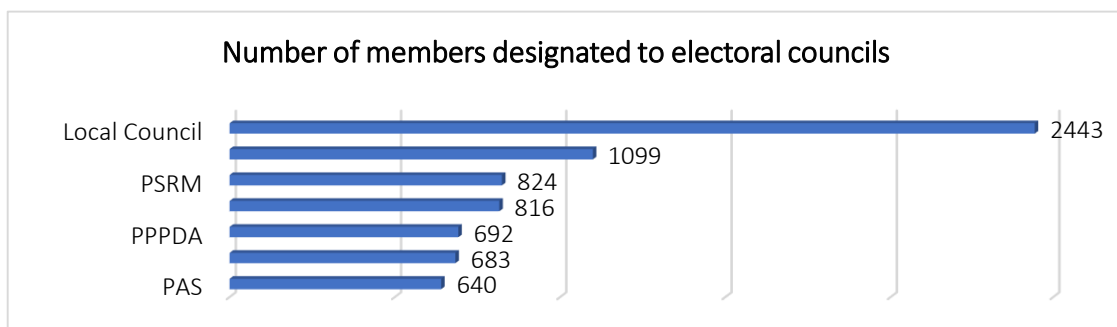
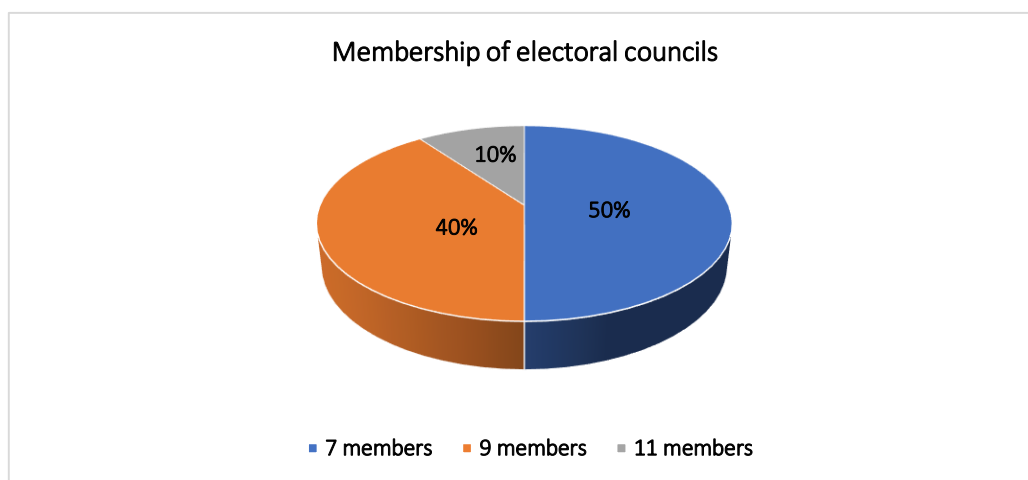


Chart no. 7 reflects the number of electoral councils in terms of their membership. Thus, most of electoral councils have 7 members, and the fewest have 11 members.

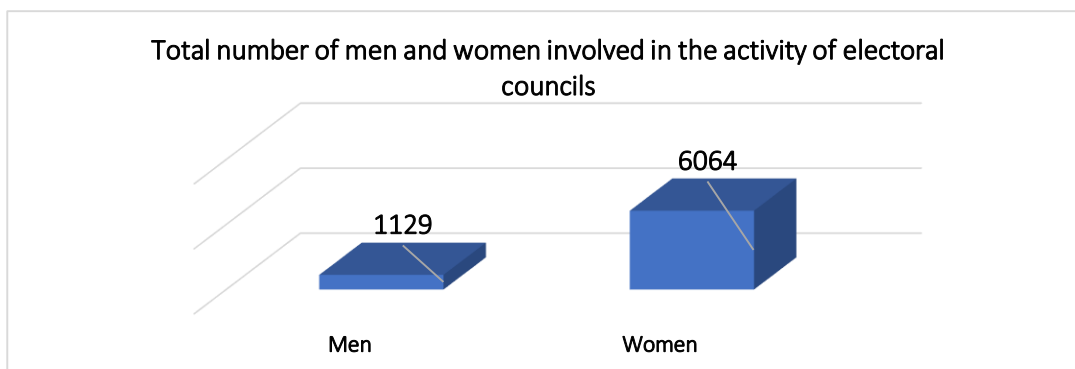
Chart no. 7



**Respecting gender balance in electoral council managerial positions**

Chart no. 8 reflects the involvement of men and women in the electoral processes carried out by electoral councils of level I. According to the data taken from the decisions of DEC's and the reports of Promo-LEX observers, there is a major difference in the level of involvement, the number of women exceeding that of men by 4,935 (see chart no. 8).

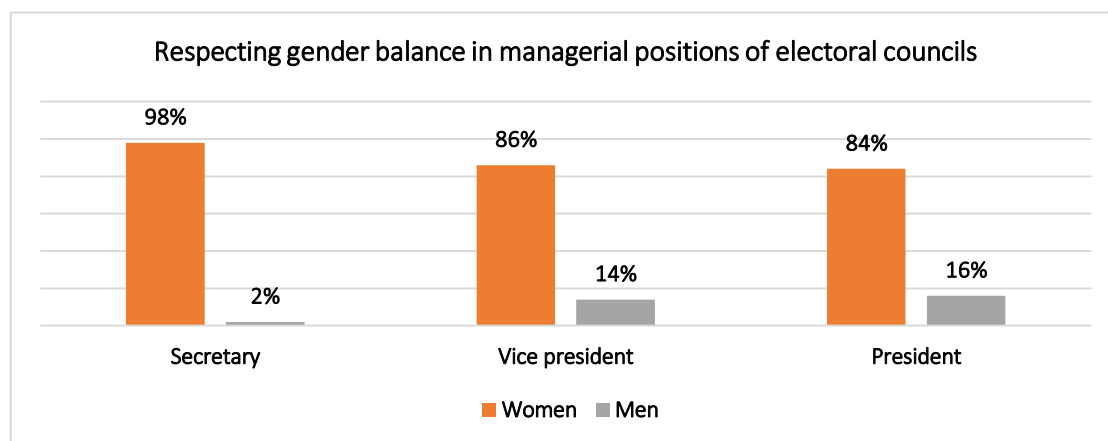
Chart no. 8



As for the gender balance at the level of managerial positions in electoral councils of level I, based on the data obtained by the Promo-LEX observers and the protocols of electoral councils, we found that women are exceeding the number of men involved in the management of electoral councils, the latter being positioned in the minority. The position of secretary, which has only executive powers, is also occupied in most cases by women (see chart no. 9).

It should be mentioned that the official website of the CEC does not display the protocols of the first meetings of electoral councils, in which the management was elected. Information on the observance of gender balance in the elective positions was obtained by the Promo-LEX observers only from the electoral councils that had the relevant documents available or whose headquarters were open.

Chart no. 9



*Compliance with the term for electing the management of electoral councils.* Within three days of the establishment of electoral council, its members shall elect, by a majority vote, by a secret ballot, the president, the vice-president and the secretary of the council. According to the reports of the Promo-LEX observers, out of 544 electoral councils from which information was obtained, the term for electing the management was respected in most cases, except for 4 electoral councils, when the election was delayed by four days.

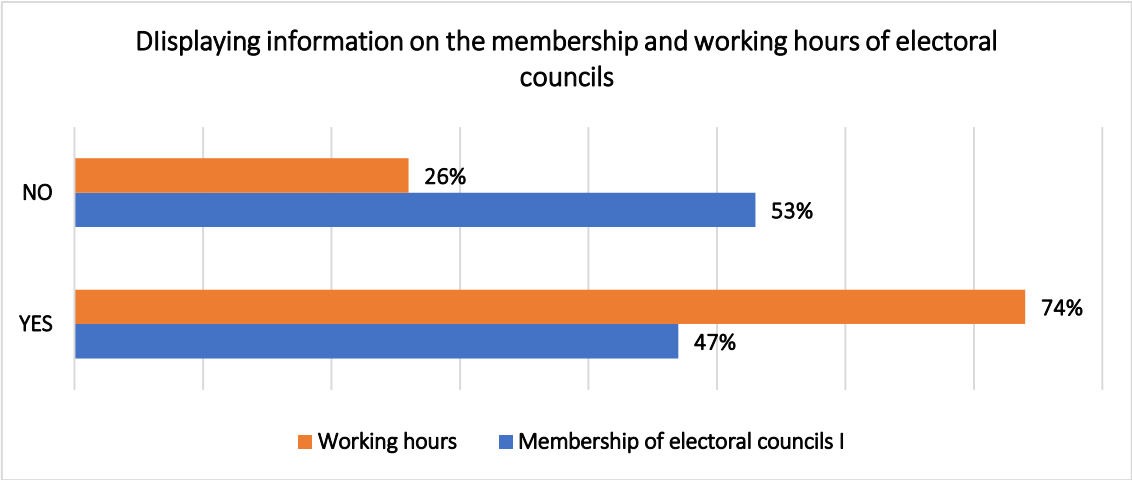
*Compliance with the secret voting procedure.* Promo-LEX observers asked the members of electoral councils whether the procedure for electing the management was respected. Thus, in the case of 543 electoral councils, the procedure of election by a secret vote was respected in proportion of 88%. In 12% of the cases, members of electoral councils stated that the management was elected by show of hands.

### **2.3.2. Publication of information of public interest**

The decisions of EC no. 5 Basarabeasca on establishing constituencies and electoral councils of level I cannot be accessed on the official page of the CEC. As for the rubric containing the decisions of DEC no. 36, ATUG, a single decision to establish level II constituencies has been published. All the information about electoral councils in these constituencies was obtained by the Promo-LEX observers working in these regions. Thus, we conclude that the authority responsible for publishing information violates the principle of decision-making transparency in the electoral process.

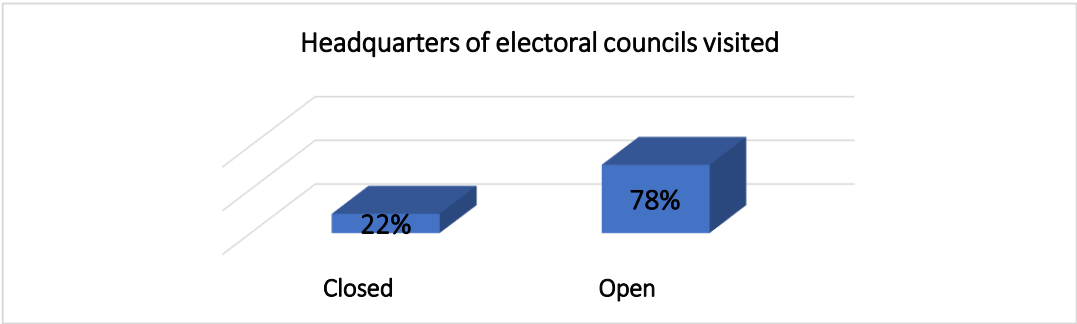
*Informing the public about the composition of electoral councils and their working hours.* In accordance with the provisions of the Regulation on the activity of electoral councils, the governing bodies of electoral councils undertake to ensure transparency in their activity by making public the decisions of the council, as well as other materials. Out of 588 cases, where it was possible to obtain information about the working hours, 74% of electoral councils had their work program displayed, and in 26% of the electoral councils, the interested persons did not have access to this information. Also, of 582 cases, in which information was obtained, only 43% of electoral councils displayed information on their composition. Therefore, more than half of electoral councils did not display the information on their membership.

Chart no. 10



*Headquarters of electoral councils.* Promo-LEX observers found it difficult to obtain information in this respect as part of the headquarters of electoral councils were closed at the time of the visit. We mention that the visits were made during working hours, according to the program displayed on the CEC website. Thus, out of the total 812 electoral councils visited, 175 (22%) of their premises were closed (see chart no. 11).

Chart no. 11



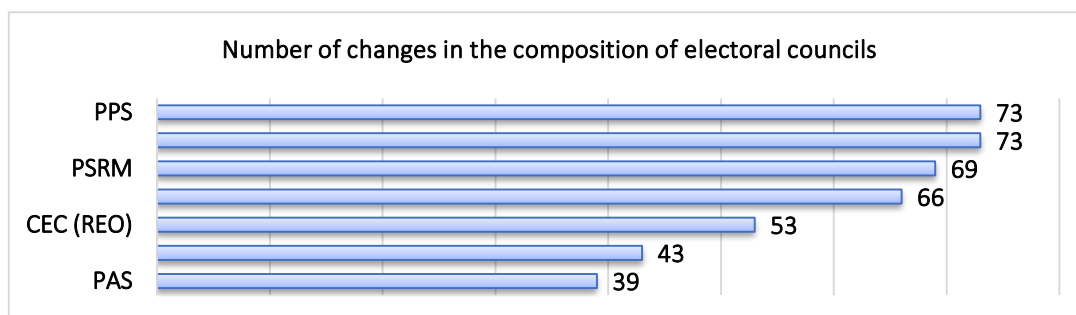
*Failure to comply with the rules of validity of the documents drawn up.* The Promo-LEX Observation Mission found cases when decisions of the DEC's did not comply with the validity elements of an act, namely the date of constituting electoral councils I (DEC no. 13 Donduseni), or cases when the decision

was not signed or stamped by the president and secretary of the DEC (DEC no. 16 Edinet, DEC no. 44 Telenesti)<sup>29</sup>.

### 2.3.3. Modification of electoral council membership

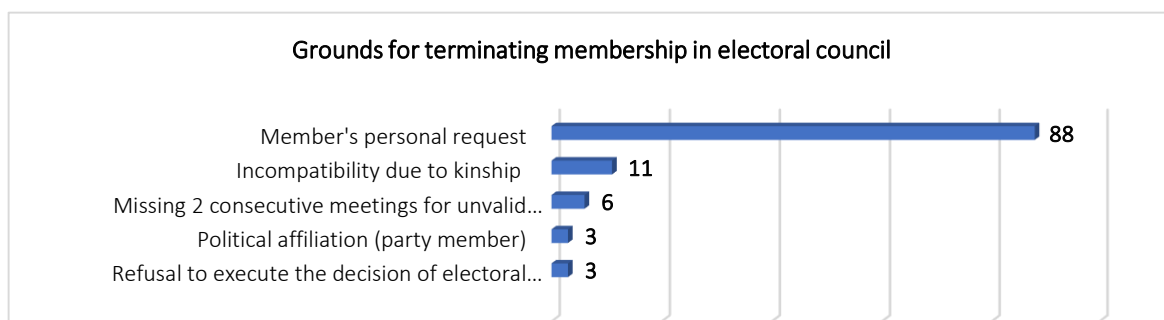
According to the reports of the Promo-LEX observers and information published on the official webpage of the CEC, 416 changes have been made in the composition of electoral councils during the monitored period. Chart no. 12 shows that the PPS, the PDM and the PSRM are the political parties that have made the most attempts to change the composition of electoral councils.

Chart no. 12



According to the reports of the Promo-LEX observers, there were cases of incompatibilities and restrictions for occupying the position of member of electoral council, which led to membership termination. Thus, in chart no. 13, we presented the grounds reported by Promo-LEX observers for the termination of electoral council membership, most requests for termination came from the members of the councils themselves invoking various personal reasons.

Chart no. 13



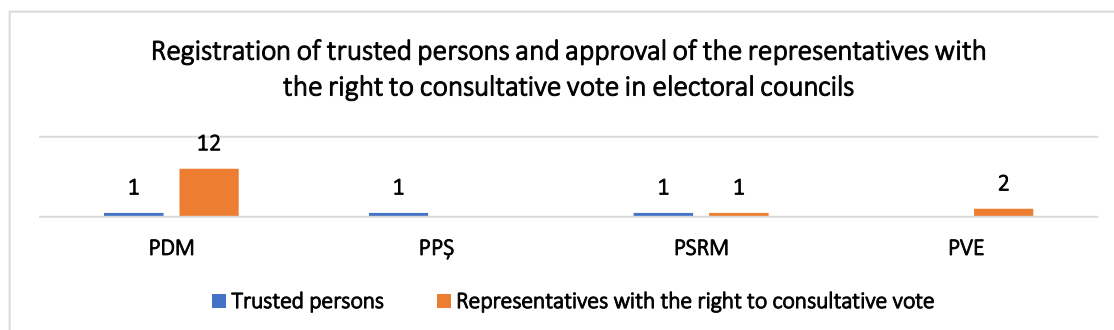
### 2.3.4. Registration of trusted persons and representatives with the right to consultative vote

According to the provisions of the Electoral Code, electoral competitors independently select their trusted persons, present them to the electoral council that registers them, adopting a decision in this respect and issue their identity cards. Also, electoral competitors may appoint a representative with the right to consultative vote to the electoral council, which is confirmed by it within three days from the moment of submission of the application.

<sup>29</sup> <https://bit.ly/2lmS2Ws>, <https://bit.ly/2kLmrNM>, <https://bit.ly/2mBTh4n>. More decisions can be seen here: <https://bit.ly/2kWij4f>

Based on the information obtained by the Promo-LEX observers, a small number of trusted persons and representatives with the right to consultative vote have been registered during the monitored period (see chart no. 14).

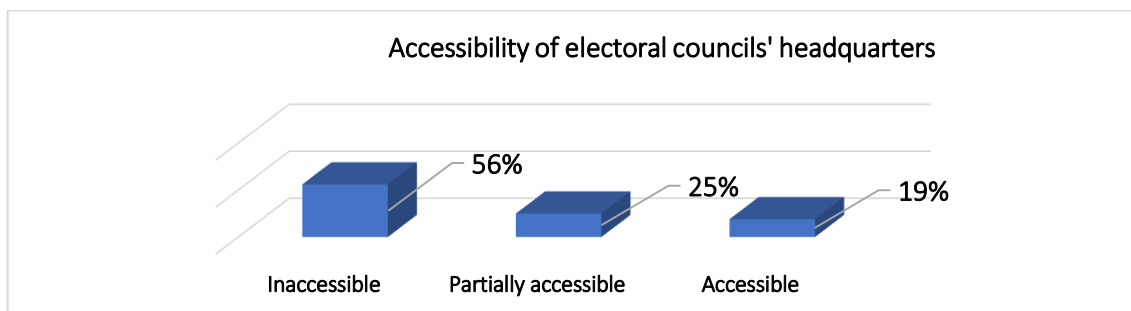
Chart no. 14



### 2.3.5. Accessibility of electoral councils' headquarters

While visiting the headquarters of level I electoral councils, 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 regulation)<sup>30</sup>, 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, out of 623 electoral councils that could be evaluated<sup>31</sup>, only 19% are accessible to vulnerable groups.

Chart no. 15



At the same time, according to the reports of the Promo-LEX observers, 32% of ECs are located on the 2nd or higher floors of the building, which makes it even more difficult to access for people interested in the electoral process.

Unfortunately, for the general local elections of October 20, 2019, no buildings with a friendly infrastructure are ensured for a large group of people (people with locomotor disabilities, the elderly, parents with strollers or other groups with special needs). Therefore, we recommend to the central and lower electoral bodies to ensure all the conditions necessary to access premises of the public interest for the purpose of October 20, 2019 elections.

<sup>30</sup> Point 17 of the CEC Regulation on the accessibility of the electoral process for persons with disabilities. <https://bit.ly/2IYpkX>

<sup>31</sup> Many of level I electoral councils of level are located on the second or higher floors of the building. Since there were cases when the premises of electoral councils were closed, the Promo-LEX observer did not have access to the premises for evaluation.

### III. DESIGNATION AND REGISTRATION OF CANDIDATES

**General local elections.** During the observed period, 2,430 files have been submitted for the positions of mayor in the 896 ECs I. Only 26% of the nominated candidates are women, respectively 74% - men. About 94% of the currently registered candidates have been nominated by 23 parties / electoral bloc and only 6% are independent. Most candidates have been nominated by the PSRM (611), the PDM (435) and ACUM Bloc (367).

Eleven and respectively twenty-one files have been submitted for the position of mayor of municipalities of Balti and Chisinau. Out of the total of 32 files submitted in these two municipalities, only one has been lodged by an independent candidate (Chisinau). Also, only two files have been submitted by women candidates (one for each municipality).

The Promo-LEX OM warns against candidates' registration contrary to the legislation in force. In addition, we are witnessing differentiated approaches which go against the principle of equal opportunities in the case of competitors that committed the same type of infringement, some being registered and others not, provided that the legislation does not provide for sanctioning those already registered. We refer to two aspects: registration of competitors who did not comply with the gender quota (at least 30 cases – DECs, 195 - ECs I) and registration of candidates based on the designation minutes adopted before the legal term set (at least 6 files have been registered).

**New parliamentary elections.** During the reporting period, of the 41 registered IGs, 25 candidates have already been registered, most of them - 11 - being registered in the SMC no. 50.

#### 2.4. Registration of competitors for the general local elections

According to the legal provisions, the deadline for nominating and submitting candidates' registration files was 1 - 19 September 2019 for DECs and, respectively, 10- 19 September 2019 for level I electoral councils. The term for examining the files submitted to the electoral bodies is seven days. Therefore, on 26.09.2019, the complete list of registered candidates is to be known.

##### 2.4.1. Designation and registration of electoral competitors for the position of mayor

During the observed period, 2,430 files were submitted to 896 electoral councils (see chart no. 16). Most files were registered in the districts of Floresti (172 files for 40 electoral councils), Hincesti (147 files for 39 electoral councils) and Falesti (145 files for 33 electoral councils). Only 26% of the nominated candidates are women, and 74% - men.

Chart no. 16

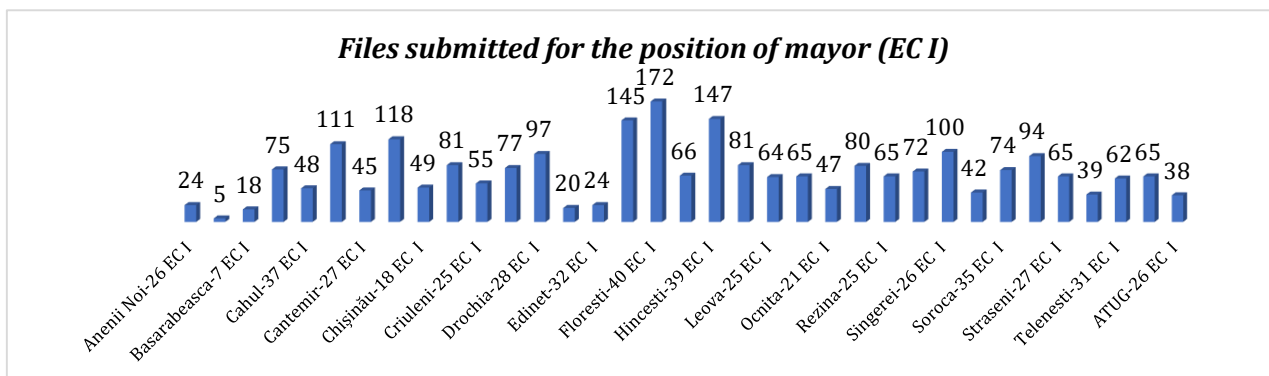
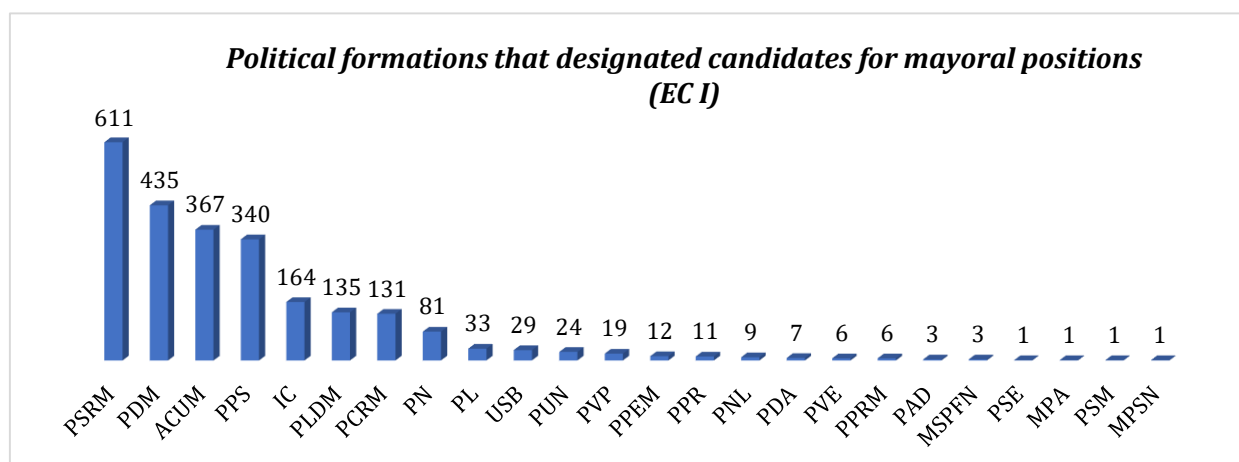




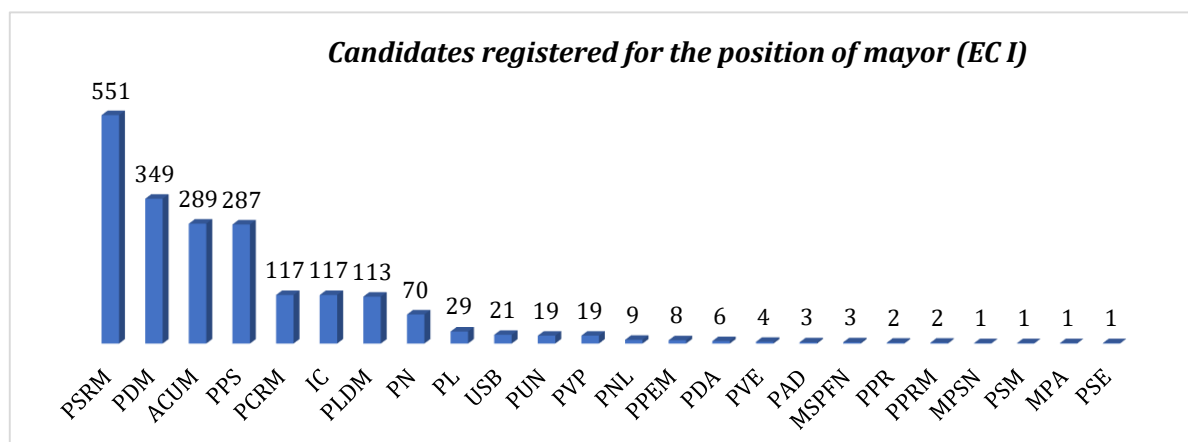
Chart no. 17 presents the number of candidates and the designating entity. Thus, we find that most candidates were nominated by the PSRM (611), the PDM (435) and ACUM Bloc (367).

Chart no. 17



Out of the 2,430 files reported, 2,022 competitors were registered as candidates for mayoral positions, of which, 6% (117) are independent candidates, and 94% (1905) are candidates nominated by 23 political parties (see chart no. 18). Most candidates registered for mayoral office were nominated by the PSRM (551), the PDM (349) and ACUM Bloc (289).

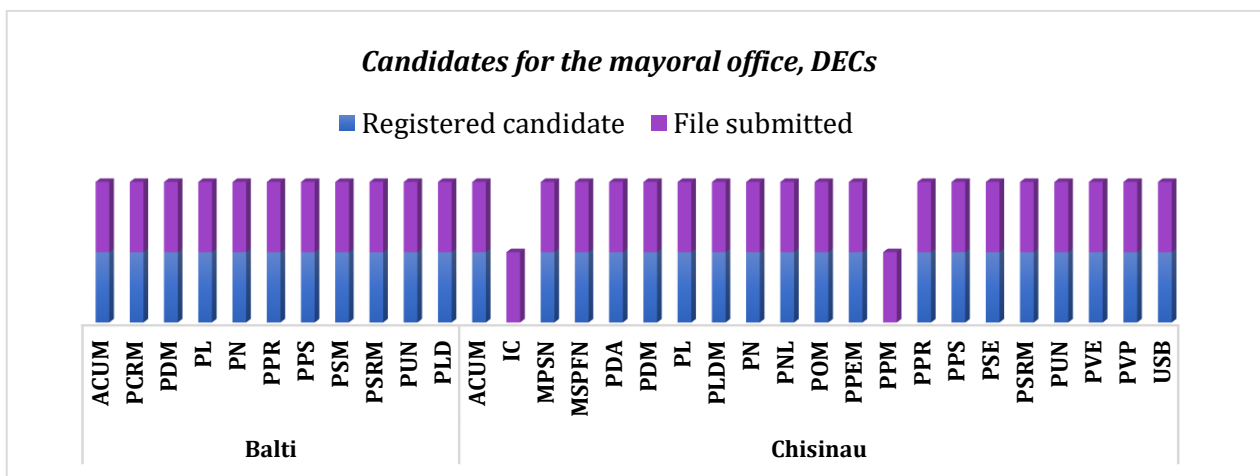
Chart no. 18



In the same context, it should be mentioned that files for the positions of mayor of Balti and Chisinau were submitted to the DECs. Thus, during the observation period, 11 files were submitted by political parties / electoral bloc in the municipality of Balti and 21 files in that of Chisinau, of which only one by an independent candidate - Ruslan Codreanu (see Chart 19). We remind the reader that the Promo-LEX OM constantly emphasizes the exaggerated number of signatures required to be collected for the registration of an independent candidate, i.e. in the municipality of Balti - about 5,500 and in Chisinau - 10,000. In this sense, the calculation formula should be revised so that the number of signatures on the subscription lists fall within the limits imposed by the Code of Good Practice in Electoral Matters (no more than 1% of the total voters).

Of the 32 candidates registered for the positions of mayor of municipality of Chisinau and Balti, only two are women candidates (Ranogaet Lilia, PNL, Chisinau, Grosu Diana, PPR, Balti)<sup>32</sup>.

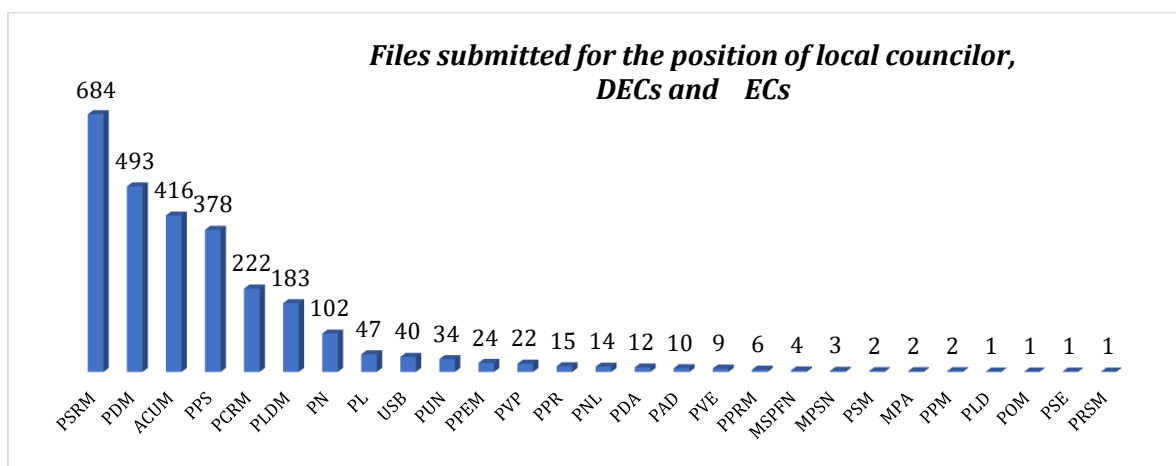
Chart no. 19



### 2.3.2. Designation and registration of electoral competitors for the position of local councilor

3,240 candidate registration files have been submitted with DEC's and EC's for the position of councilor (see chart no. 20). Most files were registered in the districts of Floresti (187 files), Causeni (178 files) and Hincesti (176 files).

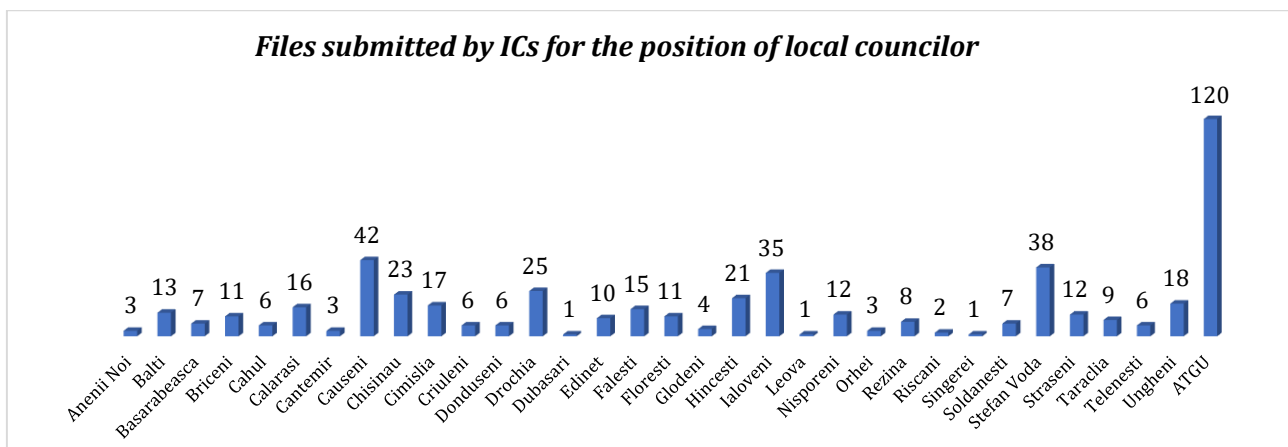
Chart no. 20



Of these, 512 files were submitted by independent candidates (79 women and 433 men). Most of IC's files were submitted in ATUG (120) - see chart no. 21.

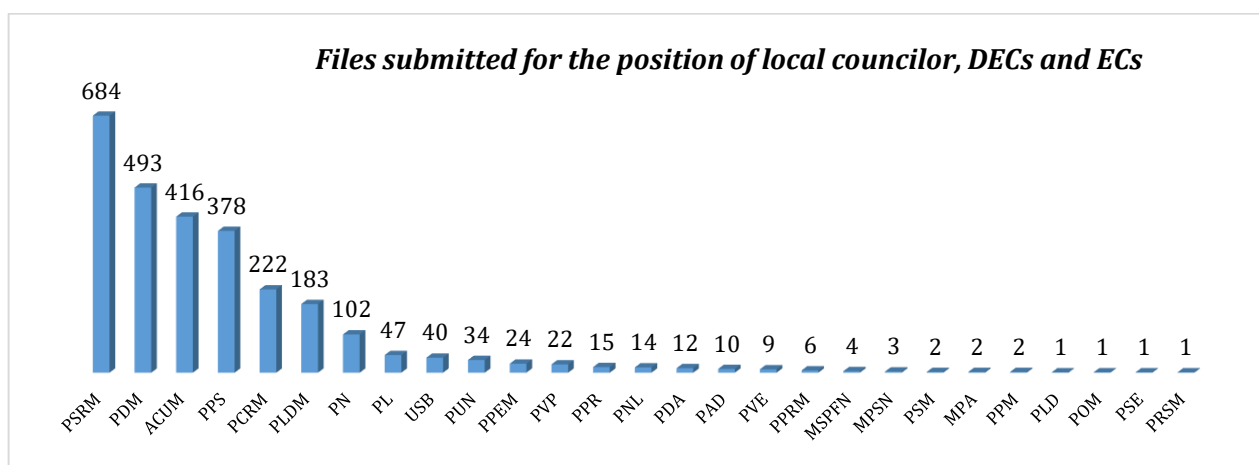
<sup>32</sup> Report no. 1. Promo-LEX Observation Mission for the new general and parliamentary local elections of 20 October 2019, p. 14. <http://bit.ly/2kpYRpL>

Chart no. 21



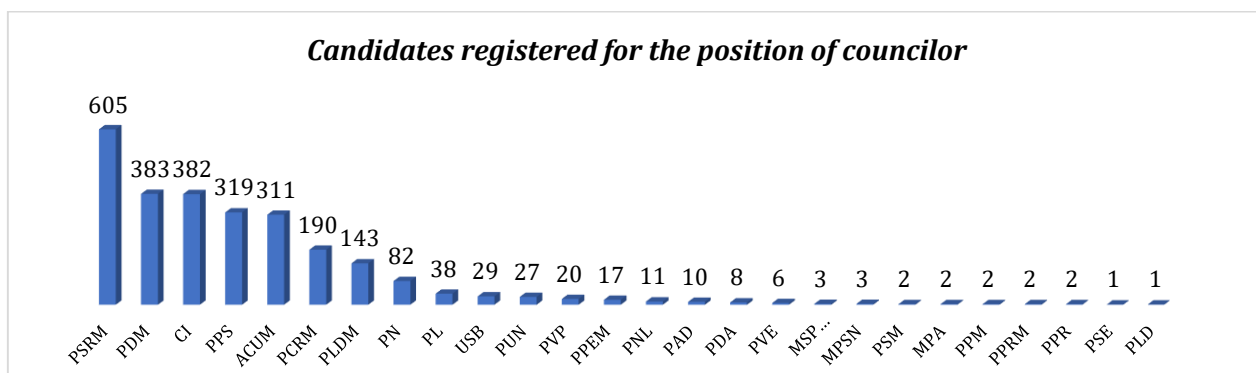
The other 2,728 files were submitted by 27 political groups (see chart no. 22). Thus, we can see that during the observed period, most files were submitted by the PSRM (684), the PDM (493) and ACUM Bloc (416).

Chart no. 22



Of 3,240 files submitted, 2,599 files have already been registered, which includes about 27 thousand candidates for the position of councilors (see chart no. 23).

Chart no. 23



At the same time, we mention that Promo-LEX observers reported at least four cases, where the registration of competitors was rejected due to non-compliance of the documents presented to the legal provisions:

- EC no. 23/23, Zberoaia, Nisporeni, rejected the application for registration of the list of candidates for the position of councilors submitted by the PCRM. The registration was refused due to multiple errors in the submitted documents;
- EC no. 28/2, Biruinta, Singerei, rejected the application for registration of the list of candidates for the position of councilors submitted by the by the USB. The registration was refused due to the submission of incomplete data (personal data of two candidates were missing);
- EC no. 28/25, Singereii Noi, Singerei, rejected the application for registration of the list of candidates for the position of councilors submitted by the PPS. The registration was refused due to multiple errors in the files (the minimum quota of 40% of candidates of the same gender was not respected, several signatures of candidates and biographical data of candidates were missing; there were many corrections);
- EC no. 36/21, Etulia, ATUG, rejected the application for registration of the list of candidates for the position of councilors submitted by the PPS. The registration was refused due to failure to respect the minimum quota of 40% of candidates of the same gender (only two women out of seven candidates).

#### ***2.4.3. Non-compliant registrations of electoral competitors for the position of councilor***

According to art. 46, para. 3) of the Electoral Code, the lists of candidates for the local elections are to be drawn up respecting the minimum representation quota of 40% for both genders. The candidates shall be listed according to the formula: at least four candidates for every ten seats. However, by way of derogation from the above provisions<sup>33</sup>, in the general local elections of October 20, 2019, the rule of at least three candidates for every ten seats was established.

In order to facilitate the activity of lower electoral bodies, on September 9, 2019, the CEC approved a circular letter<sup>34</sup>, by which it established, by way of recommendation, the minimum number of candidates of the same gender to be included on the lists in order to comply with the gender quota provisions. Having performed some calculations based on the recommendations in the circular letter, it was found that in at least 21 cases out of the 52 indicated, the minimum number of candidates 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.

Having analyzed the lists of candidates submitted to the electoral bodies, where it was possible (in many cases the verification was not possible either because the lists were not made public on the CEC website (DEC Ialoveni), or because they were published with delay, either because the files were being processed, etc.), we found at least 30 cases in 21 DEC's where candidates were registered with deviations from the provisions on gender quota (see chart no. 24).

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<sup>33</sup> Exception made by art. VII of Law 113/2019.

<sup>34</sup> CEC Circular letter no. 8/1049 of 09.09.2019. <https://bit.ly/2n0R6rl>

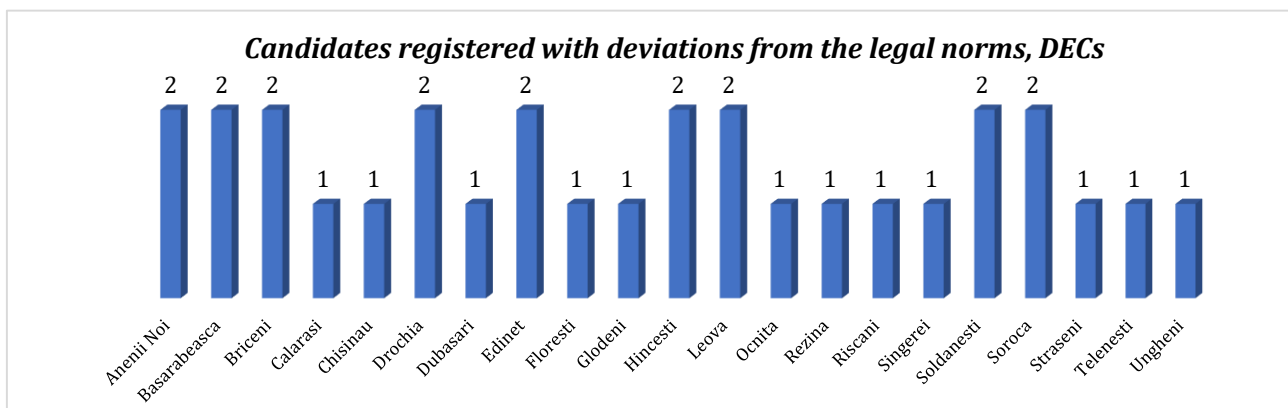
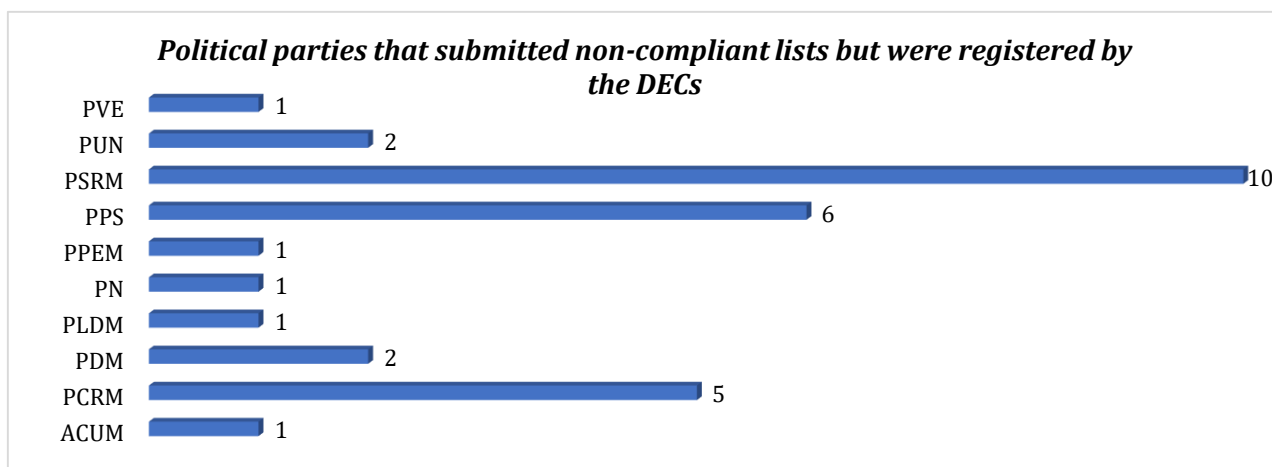
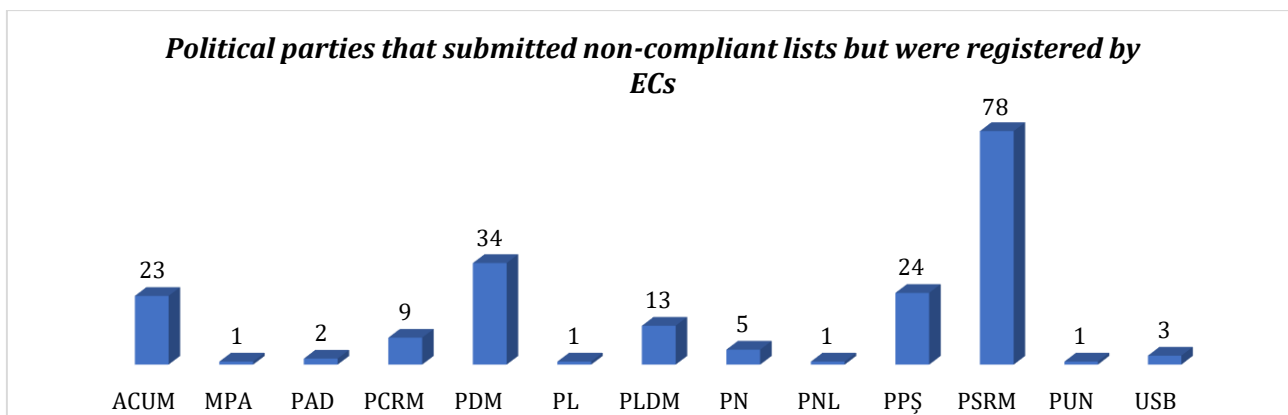


Chart no. 25 reflects the political groups that presented non-compliant lists registered by DEC's. Thus, most of the cases involved the PSRM (10), the PPS (6) and the PCRM (5).



As for ECs, observers identified at least 195 cases, in which the lists presented by political groups did not correspond to the provisions on gender quota, but were registered by ECs (see chart no. 26).



In the context of the above, we mention that according to art. 49, para. (9) of the Electoral Code, if an electoral competitor presents the list of candidates for elections that do not correspond to the requirements of art. 46, para. (3), the electoral body shall refuse its registration.

#### ***2.4.4. Registration of candidates based on the designation minutes adopted before the established legal term***

In accordance with Art. 46 of the Electoral Code, the designation of potential electoral competitors is made after the establishment of constituencies and electoral councils within them, and the right to designate them is held by parties, electoral blocs and citizens (independent candidates). At the same time, according to art. 49, para. (1) of the Electoral Code, when submitting the file for candidate's registration, the minutes of the meeting of the central or territorial body of the party or electoral bloc on the nomination of the candidate (the list of candidates) shall be submitted.

In the context of the above, we mention that the deadline for setting up DEC's was **30.08.2019**, and that of EC - **09.09.2019**. However, during the monitoring period, we identified at least three cases, where political parties presented minutes of the meeting of the central body on the nomination of candidates for the local elections of October 20, 2019 before the legal terms set:

- PDM Territorial Office (TO) in Anenii Noi: when submitting the files for registration of candidates to the positions of district and local councilors, as well as to the position of local mayors (ECs), the minutes of the territorial organization dated 01.09.2019;
- PDM TO in Causeni: when submitting the files for registration of candidates to the positions of mayor and councilors of the town of Causeni (ECs) the minutes of the territorial organization dated 02.09.2019;
- PVP Criuleni: when submitting the files for registration of candidates to the position of mayor and councilors of the town of Criuleni (ECs) the minutes of the National Council of the party dated 30.08.2019.

Despite the observed irregularities, we mention that electoral bodies registered the respective competitors (the PVP Criuleni - 16.09.2019, the PDM Causeni - 17.09.2019, the PDM Anenii Noi - at least six files registered for the position of councilors and at least three for that of mayor).

At the same time, there are precedents when electoral councils did not register competitors, who were appointed outside the legal term, for example, the refusal of the EC no. 1 Chisinau of September 24, 2019 to register the list and the candidate nominated by the PPM for the position of general mayor.

The Promo-LEX OM repeatedly warns the electoral bodies of different interpretations of the legal norm and of registration of competitors contrary to the provisions of the legislation. We also note that the legal framework does not provide for sanctioning competitors who have already been registered in violation of the Electoral Code. In addition, we could speak of double standards that affect the fundamental principle of ensuring equal opportunities to all participants in the electoral poll.

## 2.5. Registration of competitors for the new parliamentary elections

During the reporting period, 41 registered IGs managed to register 25 candidates (see chart no. 27).

Chart no. 27

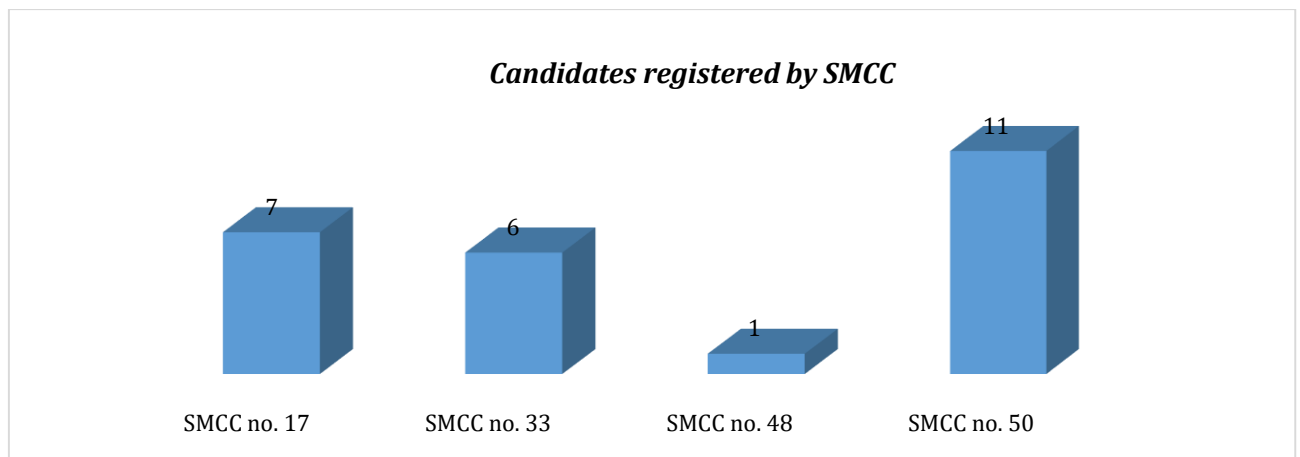
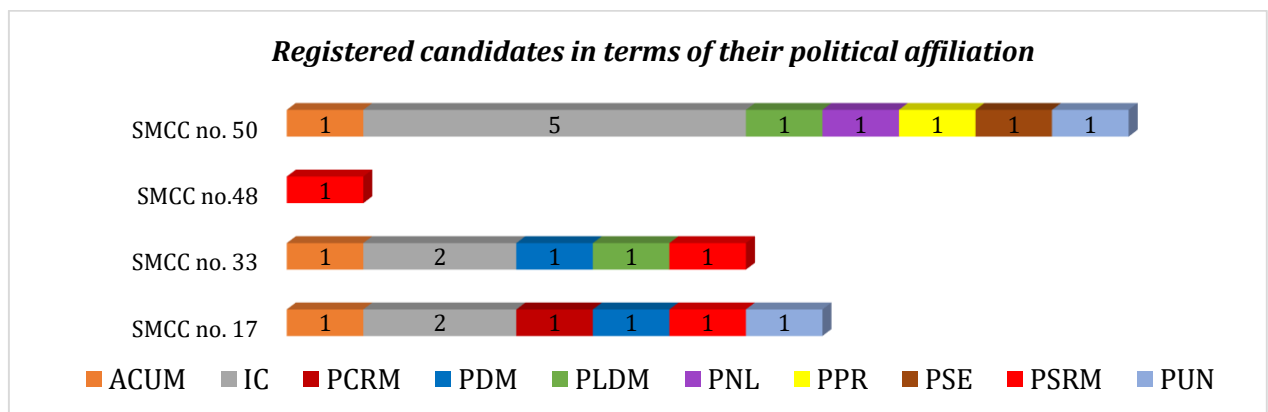


Chart no. 28 indicates the electoral competitors registered according to the entity that designated them.

Chart no. 28



As for the other 14 IGs (1 - in SMC no. 17, 5 - in SMC no. 33 and 8 - in SMC no. 48), they submitted the files for registration on the last day set by the legislation, electoral bodies are to make their decision on the correctness of documents submitted and their registration.

Two of the registered IGs did not submit documents for the registration of the nominated candidates (SMC no. 33 - the candidate appointed by the PDA, Boris Volosatii, and the candidate designated by the PAD, Mihai Godea). It should be mentioned that Boris Volosatii was also designated by the PDA to the position of mayor of Chisinau, the file being submitted on 19.09.2019.

#### **IV. PUBLIC ADMINISTRATION**

*The Promo-LEX OM finds deficiencies in the way LPAs fulfill their tasks to ensure a transparent and fair electoral process. According to the observers, only 77% of the visited LPAs approved decisions on electoral displays and only 64% - adopted decisions to provide the minimum necessary premises for meetings with voters.*

*Considering the specifics of the local elections, the Promo-LEX OM considers that LPAs, especially those of level II that have webpages, must ensure full publication of information about the candidates in the respective precinct. Out of thirty-two webpages of district public authorities, only five (Calarasi, Cimislia, Criuleni, Floresti and Nisporeni) have a rubric for elections, of which, only three (Cimislia, Floresti and Nisporeni) are adapted to the general local elections of October 20, 2019. Only Floresti LPA has published the decision to establish ECs.*

##### **4.1. Publication of information of public interest on the official websites of the LPA II**

According to the legislation in force<sup>35</sup>, the local public administration is obliged to publish the financial reports of independent candidates on its webpage. Considering the specifics of local elections, we believe that citizens should be informed by the local public administrations, especially those of level II, which, on the one hand, have webpages, and on the other, have the respective obligation.

Considering the large number of candidates running in the new local elections, the official website of the CEC will be overloaded, if it publishes all the decisions of ECs / DECAs and the reports of all electoral competitors running in all the constituencies of the country. In addition, DECAs and ECs do not have their own webpages. Hence the local public authorities, especially those that have their webpages, are obliged to inform the voters, both in the context of the legal obligations to publish financial reports, and of the public mission to inform the voters.

Therefore, the Promo-LEX OM has verified the content of the official websites of the LPAs II, to see whether information relevant to the elections of October 20, 2019 is published either by the DECAs or by the ECs.

Thus, out of thirty-two webpages of LPAs II, only five (Calarasi, Cimislia, Criuleni, Floresti and Nisporeni) have a rubric for elections, of which only three (Cimislia, Floresti and Nisporeni) are adapted<sup>36</sup> to the general local elections of October 20, 2019. Only the LPA of Floresti has published the decision to establish t ECs in the Floresti constituency.

In the context of the above findings, we recommend the LPAs II to publish on their webpages all the decisions relevant to the local general elections of October 20, 2019 in order to respect the principle of decision-making transparency at the level of EC.

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<sup>35</sup> Art 43, para. (5).

<sup>36</sup> Sections intended for elections that have not been adapted (LPA II Calarasi and Criuleni), contain decisions relevant to the parliamentary elections of February 24, 2019.



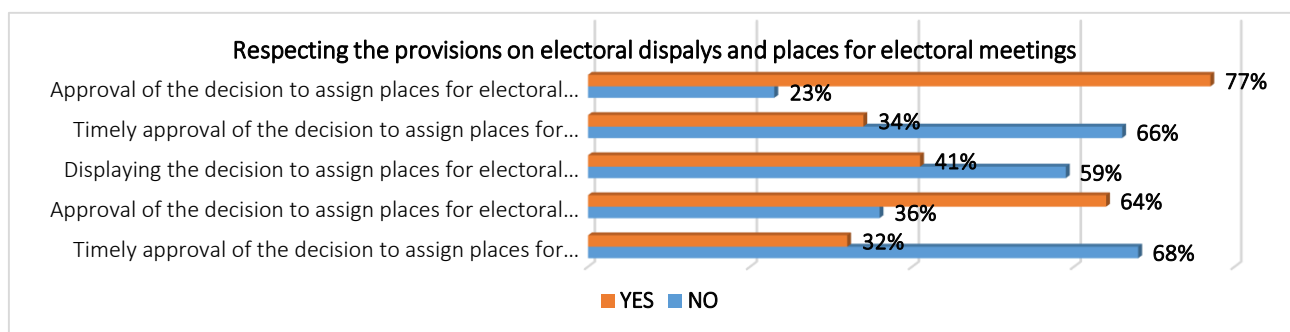
## 4.2. Establishing places for electoral display and ensuring a minimum of space for meetings with voters

According to the provisions of the Electoral Code<sup>37</sup>, LPAs are obliged, within three days from the start of electoral period, to establish and guarantee a minimum of special electoral displays and a minimum of places for conducting meetings with voters. The respective decisions (orders) must be displayed immediately at the headquarters of these authorities.

During the observation period, the Promo-LEX OM visited 812 LPAs, of which only 622 (77%) approved decisions on electoral displays. Of these, only 273 (34%) were approved within three days from the beginning of electoral period.

Regarding the decisions to ensure a minimum of premises for meetings with voters, only 521 (64%) of the visited LPAs approved such decisions, of which only 256 (32%) were approved within the legal term of three days. Moreover, the majority of the LPAs did not display the respective decisions in visible public places, or at their headquarters (see chart no. 29).

Chart no. 29



## 4.3. Arrangement of spaces for electoral display

According to the legal provisions<sup>38</sup>, LPAs are obliged to ensure in advance the removal of any posters, inscriptions and signs left from the previous election campaigns and to place uniform electoral display panels throughout the territory of the settlement. The minimum surface area granted to an electoral competitor on a public property advertising panel is 1 sq. m.

Of the 812 LPAs visited, only 620 (76%) arranged special spaces for electoral displays and only 515 (63%) provided an area of 1 sq. m. per electoral competitor.

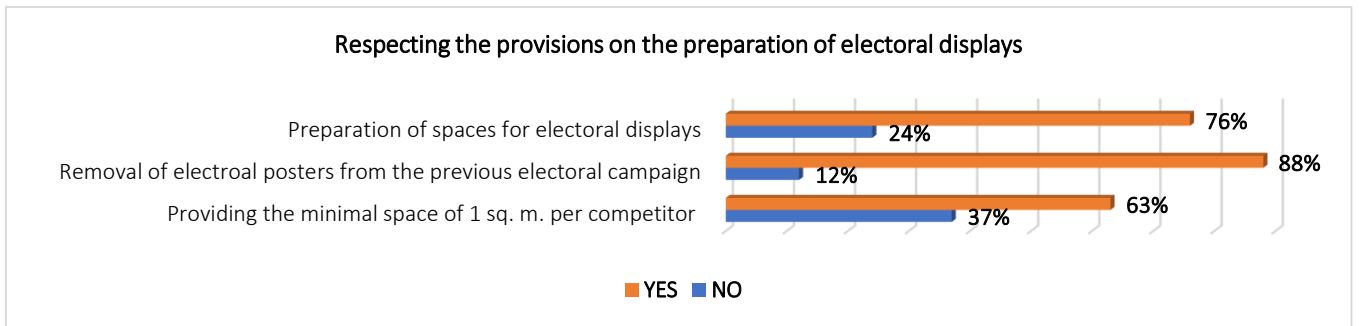
Posters from the previous election campaign (February 24, 2019) have not been completely removed, thus, out of 812 LPAs visited, in 95 cases (12%), Promo-LEX observers identified electoral displays from the previous elections. It should be mentioned that law enforcement agencies together with the LPAs are obliged to ensure the removal of these posters<sup>39</sup> (see chart no. 30).

<sup>37</sup> Article 52, para. (9) of the Electoral Code of the Republic of Moldova.

<sup>38</sup> Para. 6-7 of the Regulation on the placement of electoral advertising and political campaigning materials on the advertising panels, approved by the CEC Decision no. 3 328 of 28.04.2015, as subsequently amended. <https://bit.ly/2mK2esu>

<sup>39</sup> Para. 20 of the Regulation on the placement of electoral advertising and political campaigning materials on the advertising panels: "The bodies in charge for maintaining public order together with the local public administration are obliged to find and ensure the removal of electoral posters and / or of political campaigning materials located on advertising panels that do not correspond to the rigors provided by art. 52, para. (3), (4) and (8) of the Electoral Code".

Chart no. 30



## V. ELECTORAL COMPETITORS

*The number of activities to promote nominated / registered candidates continues to grow, being four times higher than in the previous observation period. At least 158 activities have been reported, most of them being carried out by the PSRM (99), followed by the PPS (19) and ACUM Bloc (9). The most common types of activities are: distribution of informative materials (51) and meetings with citizens (50).*

*Observers reported at least 4 cases that can be qualified as offering of goods during the electoral period, of which three - in the context of general local elections and one - in that of the new parliamentary elections. Of these, the PN was targeted in two cases (repairs of public facilities), the PPR - in one case (book donation), and the PUN in one case (book donation).*

*At least 5 cases of misuse of administrative resources have been identified (4 cases – the PSRM, 1 – the PPR). At the same time, candidates are continuously promoting themselves by claiming merits for the projects implemented on public money, at least 8 cases of this kind being identified (7 – the PSRM, 1 – the PLDM). The Promo-LEX OM found at least one situation with the involvement of the President of the Republic of Moldova, Igor Dodon, in promoting the PSRM and its potential candidates in the general local elections.*

*Additionally, observers reported 4 cases, where the image of personalities from abroad have been used to promote the candidates of PUN, all of them targeting the Romanian politician Traian Basescu.*

### 5.1. Electoral activities / activities with an electoral tinge

#### 5.1.1. Activities to promote candidates in the general local elections

According to art. 1 of the Electoral Code, in the case of general local elections, electoral competitors may begin campaigning activities on the date of their registration by the constituency electoral council. Electoral campaign implies the right of competitors to carry out electoral campaigning activities<sup>40</sup>.

During the reporting period, DEC and ECs have been involved in receiving candidates' files and their registration. We reiterate that for the general local elections, 35 DEC and 896 ECs have been set up. Therefore, the average voter finds it very difficult to keep track of every candidate's official registration and qualify the legality of activities carried out during the electoral period (with electoral or campaign intent) in the constituency where it was registered.

We remind the reader that art. 52, para. (4) of the Electoral Code stipulates that electoral campaigning is allowed only when the competitor has been registered by an electoral body. The specificity of general local elections is that political parties and electoral blocs can designate a large number of candidates for different types of elective positions (mayor, local councilor, district councilor, etc.). In this context, the launching activities, especially those at the national level, must be treated in a more responsible way by the organizers not to violate the electoral legislation.

According to the Promo-LEX observers, there have been at least 13 launching activities during the monitoring period at national, regional and local levels. The following parties and blocs officially launched their campaigns: the PSRM (4), the USB (3), ACUM Bloc, the PPS and the PUN - one event (see table no. 1).

Not only the registered candidates, but also the designated ones, as well as their supporters, may take part in the national or regional launch events. It is difficult and probably irrelevant to monitor this aspect until the potential candidate personally makes the urge to vote. Observers reported at least one case on

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<sup>40</sup> According to art. 1 of the Electoral Code, electoral *campaigning* provides for actions of preparation and dissemination of information that contains an urge to vote in order to determine the voters to vote for some or other electoral competitors.

September 21, 2019, when ACUM Bloc launched its election campaign. During the event, urges were made to vote for the candidate Andrei Nastase, who at that time did not have the appropriate status. We consider that it is the responsibility of the organizers (party / bloc) to avoid such irregularities.

We mention that during the monitored period, there were at least 158 activities aimed at promoting the nominated / registered candidates. Most activities reported involved the PSRM (99), the PPS (19) and ACUM Bloc (9).

*Table no. 1. Candidate promotion activities*

No.	Candidate promotion activities	PSRM	PPS	ACUM	PDM	PN	PUN	USB	IC <sup>41</sup>	Other parties <sup>42</sup>	Total
1	Distribution of informative materials	48			1		2				51
2	Meetings with citizens	29	9	3	5	1			2	1	50
3	Campaign launch activities	4	1	1			1	3	2	1	13
4	Press conferences	4	1	2		1			1	4	13
5	Children's / cultural events	3	4								7
6	Door to door activities	3		3							6
7	Concerts	2				2					4
8	Mobile social store		4								4
9	Gifts					2	1				3
10	Electoral displays	2					1				3
11	Sporting events	2									2
12	Sanitation events	2									2
<b>Total</b>		<b>99</b>	<b>19</b>	<b>9</b>	<b>6</b>	<b>6</b>	<b>5</b>	<b>3</b>	<b>5</b>	<b>6</b>	<b>158</b>

The most used types of activities were: distribution of information materials (51) and meetings with citizens (50).

### **5.1.2. Activities to promote candidates in the new parliamentary elections**

Considering the new parliamentary elections, two electoral meetings were reported in the SMCC no. 33, organized by the candidate of ACUM Bloc Vasile Nastase, as well as an electoral meeting organized by the candidate of the PPR Ion Leascenco.

### **5.2. Street / promotional / online advertising to promote candidates**

The Promo-LEX observers have identified at least 403 cases proving the existence of political/ electoral advertising, of which 79% involve the PSRM, and 6% the PN. The most used advertising tools were: billboards - 22%, printed materials - 19%, tents - 15% and visibility materials (hats, shirts, vests, bags, etc.) - 13%

*Table no. 2. Types of advertising*

No.	Type of advertising	PSRM	PN	USB	MSPFN	PPS	PUN	PDM	ACUM	Other parties	IC	Total
1	Billboards	72	14		1						1	88
2	Newspapers, magazines, brochures	67							1			68
3	Tents	60									2	62
4	Visibility materials	40	2								10	52

<sup>41</sup> Constantin Codreanu - candidate in the municipality of Chisinau and Nicolae Balaur - candidate in Stauceni.

<sup>42</sup> The PPR, MPA, MPSN, PLDM, MSPFN, PPEM.

5	Road banners / roll-ups	30		4		3	1			1	6	45
6	Sponsored advertising	11	8	4	5		1		1	2	4	36
7	Mobile / LED panel	14				1					4	19
8	Video spots	11	1					1				13
9	Leaflets, posters, calendars	4				1	2				1	8
10	Online banners	5					1					6
11	Written / online press/ TV	3						3				6
<b>Total</b>		<b>317</b>	<b>25</b>	<b>8</b>	<b>6</b>	<b>5</b>	<b>5</b>	<b>4</b>	<b>2</b>	<b>3</b>	<b>28</b>	<b>403</b>

### 5.3. Activities that can be qualified as gift offering in electoral period

During the monitored period, at least four cases have been reported that can be qualified as offering of goods during electoral period in order to gain electoral capital, of which three in the general local elections and one in the new parliamentary elections. Of these, the PN is targeted in two cases, in one case – the PPR, and in another case – the PUN:

- the PN (two cases): (1) the reconstruction work at the source of the river Raut (the village of Rediul Mare, Donduseni) was completed on September 21, 2019. A fountain was made near the spring and a manual iron pump was installed next to it. (2) In the second case, on September 10, 2019, three benches and two garbage bins were installed in the park of the town of Basarabasca.
- the PUN (1 case): on September 16, 2019, the candidate for the position of mayor of Balti, Sergiu Burlacu, donated 500 books to the students of George Coşbuc Theoretical Lyceum from Balti;
- the PPR (1 case): on September 12, 2019, Ion Leascenco, candidate running in the SMC no. 33 for the new parliamentary elections donated 10 volumes of "Illustrated History of Romania and the Republic of Moldova", as well as more than five hundred books, including artistic literature, classics of Romanian and universal literature, school books, photo albums and books for primary school children (Truseni Theoretical Lyceum, municipality of Chisinau).

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

The Promo-LEX OM reminds the reader that the legislation in the field is insufficient, which is why, in the mission observation reports, reference is made, in particular, to the international standards in the field, which provide that "misuse of administrative resources" for partisan purposes by the governing parties and their candidates, such as the use of government positions and equipment", should be prohibited, including to ensure fair competition between candidates.

During the observed period, the OM identified at least five cases that can be qualified as misuse of administrative resources (4 – the PSRM, 1 – the PPR). Thus, in the reference period, observers reported that *electoral competitors organized meetings with voters in public institutions during working hours*, as follows:

- Territorial Medical Association of the Rîşcani district, Chisinau 16.09.2019 (the PSRM);
- Kindergarten no. 20, Buiucani district, Chisinau, 12.09.2019 (the PSRM);
- Kindergarten no. 62, Buiucani district, Chisinau 13.09.2019 (the PSRM);
- St. Archangel Mihail Municipal Clinical Hospital 10.09.2019 (the PSRM);
- Theoretical Lyceum from Truseni, 11.09.2019 (the PPR).

### 5.5. Activities that can be qualified as claiming merits for projects implemented at public expense

Similar to previous reports, this time again we found that electoral candidates did not cease claiming merits for activities performed at public expense. At least eight cases (7 – the PSRM, 1 – the PLDM) were reported during the reference period, as follows:

- Vasile Dolghii, the PLDM candidate in the village of Micauti, Straseni, having registered as a candidate for the position of local councilor, published on the social networks the following message about the repairs of roads in the village: (...) *residents of three streets of the village contributed to the reconstruction of the road cooperating with the town hall and the Local Council. Now, they will enjoy a better road. I congratulate you and urge you to take good care of what we manage to achieve.*

- Alexandr Odintov, the PSRM candidate for the position of Chisinau municipal councilor, with reference to the capital repairs initiated at C. Sibirschi Theoretical Lyceum, mentioned on social networks: *I promised to students' parents to help them with repairs. In summer, we managed to find funds and here I am repairing the school.*

- Iurie Dimitriu, the PSRM candidate for the position of Chisinau municipal councilor, posted a live report mentioning the merits of his team in initiating the construction of a playground on Grenoble Street.

- Silvia Grigore, the PSRM candidate for the position of Chisinau municipal councilor, after a working (check) visit to the Kindergarten no. 199, published on social networks photos depicting the deplorable state of the institution and mentioned: *we, socialist councilors, have identified a part of financial means necessary to repair and buy new equipment, as you can see in the pictures, the current one is absolutely outdated.*

- Ion Ceban, the PSRM candidate for the position of mayor of Chisinau, referring to the recreational development of the Albisoara Park, mentioned on the social networks: *Last year, in the electoral campaign, we proposed a comprehensive program for the improvement of parks and green areas. We still have much to do, but the changes are already visible.*

- Ion Ceban, the PSRM candidate for the position of mayor of Chisinau, mentioned in a message on social networks referring to the lump sum benefit of 2,000 lei given at the birth of the third child: *Last year, in the electoral campaign, I promised that this benefit will be kept, and the categories of beneficiaries will be extended. This benefit also reached the needy families, in which the first child was born. During this period, we managed to help 2,500 families, and the program is ongoing. We promised to offer free of charge dairy and essential products in the first year of the child's life. We managed to do it, with the support of our colleagues from the CMC, we amended the regulation and, for the first time, families from the suburbs and those with twins and triplets were supplied with these products, regardless of their social status.*

- Ion Ceban, the PSRM candidate for the position of mayor of Chisinau, mentioned on social networks referring to free lunches: *Many people get free lunches. The problems of low-income inhabitants of the capital have always been the focus of the Socialist Party. At the insistence of our faction in the CMC, the regulation on granting free lunches to social canteens was modified. We have proposed to include into this category people with incomes of up to 3,000 lei, not only those receiving up to 2,000 lei, as it was in the previous years. We managed to increase the number of people who can get free lunches from 700 to 1,200. I know, it is too little and there are still many people who need help, that is why we will continue to support programs for the most vulnerable categories of population.*

- Printed posters with the PSRM logo were distributed in the courtyard of residential blocks in the Botanica district of Chisinau, with the following content: *Dear tenants! Work will be carried out in your courtyard. Together with you, we managed to allocate financial sources for this and other projects, and all of these became possible due to your initiative and our collaboration with you. The Secretariat of the municipal faction of the PSRM.*

## **5.6. Events that can be qualified as promotion using the image of public authorities**

The Promo-LEX OM has also found a case that can be qualified as involving the President of the Republic of Moldova, Igor Dodon, in promoting the PSRM and its potential candidates in the general local elections<sup>43</sup>.

Thus, on September 15, 2019, there was an event dedicated to the official launch of the PSRM in electoral campaign. At the beginning of the event, president Igor Dodon delivered a speech, mentioning the capabilities of the PSRM and the fact that it is a pro-presidential party, recognized in all opinion polls as the best. The president further emphasized: *We have to win and I am sure that the victory will be ours.*

## **5.7. Cases that can be qualified as promoting candidates using the image of personalities from abroad**

During the monitored period, the OM reported 4 cases, where the image of personalities from abroad was used to promote candidates, two in the local elections and two in the parliamentary elections. In all four cases, the Romanian politician Traian Basescu (the PUN) was targeted.

In the general local elections, the image of Traian Basescu was used on printed materials (without printing data) given out by the PUN and on online banners to promote the candidate Iurie Eremeev in the town of Durlleşti (printed message: *I support Iurie Eremeev as mayor of Durlleşti*). It should be mentioned that it happened at the time when the PUN candidate was not yet registered by the EC of Durlleşti.

It should be mentioned that in the new parliamentary election campaign, the same format of printed materials and the same message promoted with the image of Traian Basescu was reported in the case of PUN candidates in the SMC no. 17 (Ana Gutu) and no. 33 (Sveatoslav Mihalache).

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<sup>43</sup> See: Report no. 1 and no. 2 of the Promo-LEX OM for the general local elections and the new parliamentary elections of October 20, 2019, p. 24 and, respectively, p. 32. <http://bit.ly/2kpYRpL> , <https://bit.ly/2kb7AMs>

## **VI. FINANCING OF ELECTORAL CAMPAIGNS**

*In the period of 6- 20 September 2019, the total amount of revenues declared by 7 competitors registered for the general local elections reached 9,910 132 lei and the amount of expenses reported by 5 of them - 2,487,103 lei; the final balance being – 7,423,029 lei. The major share of declared expenses falls for advertising - 74%, promotional materials - 12%, expenses for meetings and events - 8%, use of transportation- 4%; other expenses - 2%.*

*The Mission also ascertains failure to report expenses incurred for transportation, rent of permanent offices, including territorial ones, utilities related to the rented premises, expenses for delegation or secondment of persons (including rewards / per diem expenses of the observers and volunteers) by the four electoral competitors that submitted their reports to the CEC – the PSRM, the PPS, the PDM, the PN.*

*The Mission repeatedly highlights situations reported by Promo-LEX in previous polls, in particular facts that undermine transparency of the financing of general local election campaign. From the Mission's point of view, they can serve as a basis for investigation by the competent bodies. A conclusive example in this respect is the transfer of 5,59 million lei from the current account of the PSRM to the electoral one, without indicating who de facto made the contribution, or donations ranging from 5 to 15 thousand lei from some pensioners made in favor of the PPS and the PN. We consider it necessary for the CEC to verify the provenance of electoral competitors' sources of revenues. Moreover, the CEC should verify the manner of collecting and recording revenues by primary donors (political groups) be it through cash and control equipment (CCE), or through payment orders, to avoid forgery.*

*The Promo-LEX OM emphasizes that 12 electoral competitors failed to fully reflect the expenses incurred in the period of 6-20 September 2019, in particular: the PPS, the PSRM, the PDM, the PN, the USB, the MSPFN, the PUN, the MPSN, the MPA, the PCRM, ACUM Bloc, the PSE. Moreover, we found that electoral expenses have been covered by means derived outside the electoral fund account by the PCRM, ACUM, the MSPF, the MPA, the PSE. The total estimated unreported amount reached at least 1,016,303 lei. In the case of the new parliamentary elections, the Promo-LEX OM finds a low degree of transparency in the financing of signature collection activities. Moreover, the financing of electoral campaign, so far, seems to be equally non-transparent, given that only two competitors of the seven registered (the PUN, the PDM) have submitted weekly financial reports to the CEC, mentioning "0" revenues and expenses.*

### **6.1. Financing of electoral campaigns for general local elections**

#### **6.1.1. Regulation on the financing of electoral campaign for general local elections**

Financing of electoral campaign is regulated by the Electoral Code, Law no. 249 on Political Parties, the CEC Regulation on the financing of electoral campaigns, approved by the Decision no. 2704 of 17 September 2019, and the Regulation on the financing of initiative groups, approved by the CEC Decision no. 114 of 18 August 2016<sup>44</sup>.

On September 17, 2019 the CEC adopted the Regulation on the financing of electoral campaigns<sup>45</sup> in a new editorial, adjusted to the new amendments of the Electoral Code regarding the financing of the electoral campaign. In addition to the regulation, annexes to it have also been adjusted.

Thus, the Promo-LEX OM notes that the current report model has been improved with the inclusion of annexes regarding the reporting of expenditures per constituency, reporting of material donations, as well as inclusion of a new budget line for *donations of individual citizens of the Republic of Moldova from outside the country*. However, the report does not require the amount of material donations (services / goods, etc.) to be included in the revenues balance. The Promo-LEX OM considers it wise to include the

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<sup>44</sup> See Report no. 2 of the Promo-LEX OM for the general local elections for detailed information on the legal framework regarding the financing of the electoral campaign, p. 35-38. <https://bit.ly/2kb7AMs>



amount of *material donations* in the second compartment of the report - "Turnover of financial means", so that they are taken into account in calculating both revenues and expenses.

At the same time, we highlight the lack of compliance with the rules of decision-making transparency and **the long delayed approval of the above regulation**, since by the time of its approval, in the municipality of Balti, four candidates for the position of mayor have been registered and four political parties and six independent candidates registered their candidates for the position of councilors, while in Chisinau, five candidates registered for the position of mayor, five political parties and one independent candidate registered their candidates for the position of councilor. In their case, the Regulation on the financing of electoral campaign in the wording of 2015 was applicable, insofar as it did not contravene the Electoral Code.

However, due to some omissions, one week after the approval of the new Regulation on the financing of electoral campaign, the CEC approved the Decision no. 2 733 of 24.09.2019 for its modification. The decision in question modified the periodicity of bank's obligation to inform the CEC about the flow of money means into the "Electoral Fund" account from "weekly on Fridays" to the "daily" basis.

In addition, the **Promo-LEX OM attests to the lack of a regulatory framework for the financing of initiative groups involved in the general local elections**, although both the Electoral Code and the Regulation on peculiarities of nomination and registration of candidates for the local elections provide for the possibility of setting up initiative groups and the obligation to approve this regulation. The Central Electoral Commission has failed to approve the Regulation on the financing of initiative groups for collecting signatures in support of candidates for elective offices or to initiate a referendum in the ordinary meeting of 10.09.2019, failing to meet the required number of votes.

#### ***6.1.2. Submission to the CEC of the report on the financial means available on the party account at the beginning of electoral campaign***

According to the legal provisions, the Promo-LEX MO notes that, until September 20, 2019, only eight of 25 political parties and electoral bloc that intended to enter the electoral race (the PSRM, the PPS, the PPPDA<sup>46</sup>, the PN, PDM, the PVE, the USB, the PPVP) presented reports indicating their own financial means accumulated by the beginning of electoral campaign - **September 20, 2019**, specifying the revenues, expenses, as well as the donors<sup>47</sup>.

Thus, at the beginning of electoral campaign, the PSRM reported revenues of 11,461,402.95 lei, initial balance (IB)- 5,035,708.72 lei; the PDM – 28,815,097 lei, IB – 22,509,523.13 lei; the PPS – 10,325 471.88 lei, IB – 25,929.92 lei; the PPPDA (component of ACUM Bloc) - 1,497,815.45 lei, IB – 11,490.33 lei; the PN – 1,397,600 lei, IB – 1,237,786.23 lei; the USB – 51,000 lei, IB - 0 lei; the PPVP – 8, 208 lei, IB - 0 lei; the PVE – 25,354 lei, IB – 69,601.34 lei.

The Promo-LEX OM notes non-compliance with the obligation to present the report on their own financial means of the following political parties that have registered in the electoral race: the MSPFN, the MPSN, the PSE, PPEM, the PPDA, the PUN, the PPRM, the PPM, the PNL, the PL, the POM. This fact may be detrimental to electoral competitors nominated by these formations, since the respective formations will not have the right to transfer money from the current party accounts to the "Electoral Fund" accounts.

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<sup>46</sup> At the beginning of electoral campaign, only one member of ACUM Bloc – the PPPDA - submitted a financial report indicating the revenues, expenditures and donors.

<sup>47</sup> Reports on the financial means accumulated on the party account at the beginning of electoral period.

<https://bit.ly/2m4cUC0>

### **6.1.3. Electoral funds and treasurers**

According to the data published on the official page of the CEC, the Promo-LEX found that, by September 20, 2019, out of 25 registered parties and electoral blocs (or the ones that have requested to be registered in electoral race) only eight have confirmed their treasurers to the CEC (the PSRM, the PPS, the PDM, the USB, the PN, the PPEM, the PLDM, ACUM Bloc).

Additionally, according to the information published by the CEC, eight political formations – the PSRM, the PPS, the PDM, the PLDM, the MSPFN, the PPVP, the PN and the PLDM - opened "Electoral Fund" accounts. During the reference period, only five of eight political parties (the PSRM, the PPS, the PN, the PDM, the PUN) 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<sup>48</sup> (see table no. 3).

### **6.1.4. Electoral competitors' financial reporting to the Central Electoral Commission**

The Promo-LEX OM notes that in the period of 6- 20 September 2019, seven political groups submitted reports on the financing of electoral campaign for week I (the PDM, the PLDM, the PN, the PSRM, the PPS, the USB, the PUN), four formations for week II - (the PSRM, the PLDM, the PPS, the PDM) and two formations for week III (the PSRM, the PPS). No party / electoral bloc submitted any requests for non-execution of expenses. According to the data obtained by the Promo-LEX observers, no IC submitted financial reports by September 20, 2019, although the legal provisions stipulate this. According to our findings, the CEC published in due time the reports submitted on 6, 13 and 20 September, 2019 (see table no. 3).

It should be mentioned that in para. 6.5. of this report - *Estimating the expenses based on civic observation in the territory* - we evaluate compliance of electoral competitors' activity with the legal norms of electoral campaign financing within the term set / prior to the term set (see column II - the first candidate registered by the party / electoral bloc / political movement; column VI - Date of opening of "Electoral Fund" account). We remind the reader that, according to art. 41, para. (2), let. b), c) of the Electoral Code, the account with the mention "Electoral fund" may be opened before the registration of electoral competitor, **provided that any receipts and expenses from this account will be made only after the registration of electoral competitor**; the electoral competitor who does not open a bank account with the mention "Electoral fund" shall inform the CEC about it and only carry out campaign or electoral promotion activities that do not involve financial expenses.

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<sup>48</sup> Political parties and electoral blocs shall submit to the Central Electoral Commission, within three days from the opening of the account with the mention "Electoral fund" and, subsequently, on a weekly basis, a report on the accumulated financial means and the expenses incurred in the electoral campaign, both electronically, as well as on paper, signed by the responsible persons.

Table no. 3. Designation of treasurers and opening of "Electoral Fund" accounts

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 <sup>49</sup>	Date of confirmation of the treasurers by the CEC <sup>50</sup>	Date of opening of the "Electoral Fund" account	Submission of financial reports within 3 days of opening the "Electoral Fund" account <sup>51</sup>	Submission of financial statements for week I <sup>52</sup>	Submission of financial reports for week II <sup>53</sup>
1.	PSRM	04.09.2019	05.09.2019	05.09.2019	06.09.2019	09.09.2019	13.09.2019	20.09.2019
2.	PPVP	11.09.2019	-	-	12.09.2019	20.09.2019	21.09.2019	-
3.	USB	11.09.2019	-	13.09.2019	-	-	-	-
4.	PPS	06.09.2019	09.09.2019	05.09.2019	04.09.2019	06.09.2019	13.09.2019	-
5.	MSPFN	13.09.2019	-	24.09.2019	16.09.2019	21.09.2019	-	-
6.	PSE	18.09.2019	-	-	-	-	-	-
7.	PN	12.09.2019	17.09.2019	13.09.2019	17.09.2019	20.09.2019	20.09.2019	-
8.	PPEM	12.09.2019	-	17.09.2019	-	-	-	-
9.	PDM	10.09.2019	02.09.2019	10.09.2019	11.09.2019	13.09.2019	13.09.2019	-
10.	PPDA	18.09.2019	-	-	-	-	-	-
11.	ACUM	12.09.2019	-	17.09.2019	-	-	-	-
12.	PLDM	06.09.2019	-	13.09.2019 <sup>54</sup>	06.09.2019	10.09.2019	17.09.2019	20.09.2019
13.	PVE	14.09.2019	04.09.2019	24.09.2019	-	-	-	-
14.	PUN	11.09.2019	-	24.09.2019	17.09.2019	19.09.2019	20.09.2019	-
15.	PPR	18.09.2019	-	-	-	-	-	-
16.	PPM	-	-	-	-	-	-	-
17.	PNL	13.09.2019	-	24.09.2019	-	-	-	-
18.	PL	13.09.2019	-	-	-	-	-	-
19.	POM	-	-	-	-	-	-	-
20.	MPSN	07.09.2019	-	-	-	-	-	-
21.	PCRM	06.09.2019	-	-	-	-	-	-
22.	MPA	18.09.2019	-	-	-	-	-	-
2.	PAD	18.09.2019	-	-	-	-	-	-
3								
24	PSM	18.09.2019	-	-	-	-	-	-
25	PPRM	16.09.2019	-	-	-	-	-	-
	<b>Total</b>		6	8	8	8	7	2

As far as filling out of the financial reports is concerned, following a thorough analysis of their data, the Mission approves of the report model developed by the CEC, which obliges electoral competitors to reflect the segregated expenses for each constituency where they have registered candidates. Thus, the Mission notes that four competitors (the PSRM, the PLDM, the PPS, the PDM) reported their expenditures for each constituency and at the same time, notes that an electoral competitor (the PN) did not indicate

<sup>49</sup> Official website of the CEC, reports as of the beginning of electoral period. <https://bit.ly/2m4cUC0>

<sup>50</sup> Official webpage of the CEC, Decisions. <https://bit.ly/2kxaOKs>, <https://bit.ly/2m4XM76>, <https://bit.ly/2lStEvU>, <https://bit.ly/2lP97Z9>, <https://bit.ly/2klWowD>, <https://bit.ly/2kOw12z>, <https://bit.ly/2kaV9iB>, <https://bit.ly/2lBs4hF>, <https://bit.ly/2k65MnY>

<sup>51</sup> Official webpage of the CEC, reports submitted within 3 days from the opening of "Electoral Fund" account. <https://bit.ly/2kKYaaS>

<sup>52</sup> *Ibidem*, <https://bit.ly/2kKYaaS>

<sup>53</sup> *Ibidem*, <https://bit.ly/2kKYaaS>

<sup>54</sup> On 24 September, the judgment of 13 September was amended. <https://bit.ly/2mF9d5K>

in the report the segregated expenses in the constituencies where it has candidates, providing only general data on the expenses incurred.

A shortcoming that has been previously mentioned by the Mission is the format of the report template published on the official page of the CEC. The published reports are 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 OM 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 page of the CEC, so that the data could be used for analysis purposes by the associate experts, media and academic environment.*

#### **6.1.5. Revenues and expenses of electoral competitors reflected in the reports on financing of electoral campaigns**

According to the reports presented to the CEC, the amount of revenues declared by the seven registered competitors for the period of **6-20 September 2019** is 9,910,132 lei and the amount of expenses reported by five of them is 2,487,103 lei; final balance (FB) being 7,423,029 lei.

Thus, the PSRM reported revenues of 6,490,000 lei (30.81% of the maximum ceiling set) and expenses of 708,213 lei; the PPS - revenues of 740,500 lei (3.52% of the ceiling) and expenses of 734,633 lei; the PLDM - revenues of 1,000,000 lei (4.75% of the ceiling) and expenses of 219,994 lei; the PDM - revenues of 100,000 lei (0.47% of the ceiling) and expenses of 8,082 lei; the PN - revenues of 1,542,700 lei (7.32% of the ceiling) and expenses of 816,180 lei; the PUN - revenues of 28,000 lei and "0" expenses; the PPVP - revenues of 8,932 lei and "0" expenses. We remind the reader that the maximum ceiling of financial means that can be transferred to the "Electoral Fund" account is 21,062,750 lei for each electoral competitor. At the same time, the CEC has set the maximum ceiling for each single member constituency<sup>55</sup>.

#### **Sources of financing of electoral competitors consist of:**

- financial donations made by 197 natural persons amounting to 1,770,132 lei for four competitors (the PPS, the PN, the PUN, the PPVP);
- own resources (membership fees) - transfer from the account of a political party (the PSRM) in a total amount of 5,590 000 lei;
- subsidies from the state budget from the current accounts of three political parties amounting to 2,450,000 lei (the PSRM, the PLDM);
- transfer of own funds from the party's current account to the "Electoral Fund" account of the PDM - 100,000 lei;
- material donations totaling 192,658 lei, for one formation<sup>56</sup> (the PPS) (see chart no. 31).

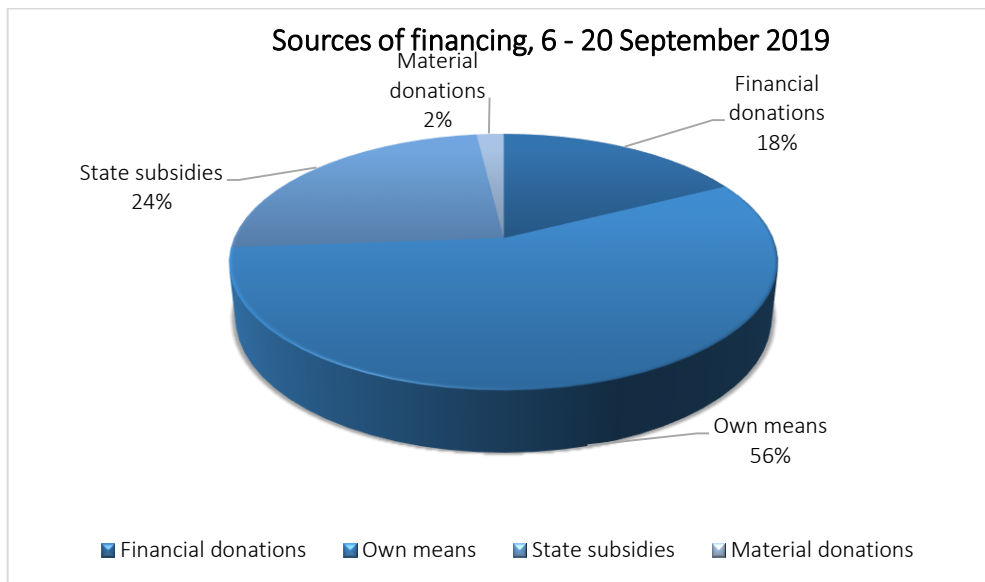
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<sup>55</sup> CEC Decision no. 2640 on the establishment of a general ceiling of financial means that can be transferred to the "Electoral Fund" account of electoral competitors in the general local elections of October 20, 2019.

<https://bit.ly/2lSCnhq>, Annex Decision of the CEC no. 2640.

<sup>56</sup> Material donations are not included in the balance sheet of the financial report, in the compartment of revenue of financial means.

Chart no. 31



Data obtained from reports submitted to the CEC

According to the financial reports submitted and made public by the CEC, the Promo-LEX OM notes that two electoral competitors registered donations ranging from 5 to 15 thousand lei, from some pensioners and unemployed donors (the PPS - 42 pensioners, 11 unemployed<sup>57</sup> and the PN - four pensioners<sup>58</sup>). *The Promo-LEX OM draws the reader's attention to the fact that **the average monthly pension does not exceed 2,000 lei** and thus, the existence of such donations raises suspicions about the pensioners' ability to make financial donations.*

The Mission also reiterates the **need to throw light on the identity of primary donors of the party / members who pay fees to the party**, in the event that the party transfers large sums to the account of an electoral competitor. Thus, the Promo-LEX OM notes that the PSRM has transferred approximately 5.59 million lei from the party's account to the "Electoral Fund" account, without nominally indicating who had de facto contributed to it. For comparison, the transfer of 100,000 lei made by the PDM from the current party account to the "Electoral Fund" account is a transparent one, because the party report submitted at the beginning of electoral campaign<sup>59</sup> includes the list of donors, unlike the PSRM, which hides the persons from whom they receive contributions. *The Mission qualifies this situation as one that undermines the transparency of the financing of electoral campaign for the general local elections. Next, we consider it necessary for the CEC to verify the provenance of electoral competitors' sources of income, as well as to check the manner of collecting and recording the revenues of the primary donors / taxpayers (political groups) by using the cash and control equipment (CCE) or by issuing invoices, not admitting forgery of documents.*

<sup>57</sup> Report submitted on September 20, 2019. <https://bit.ly/2m0uVkd>

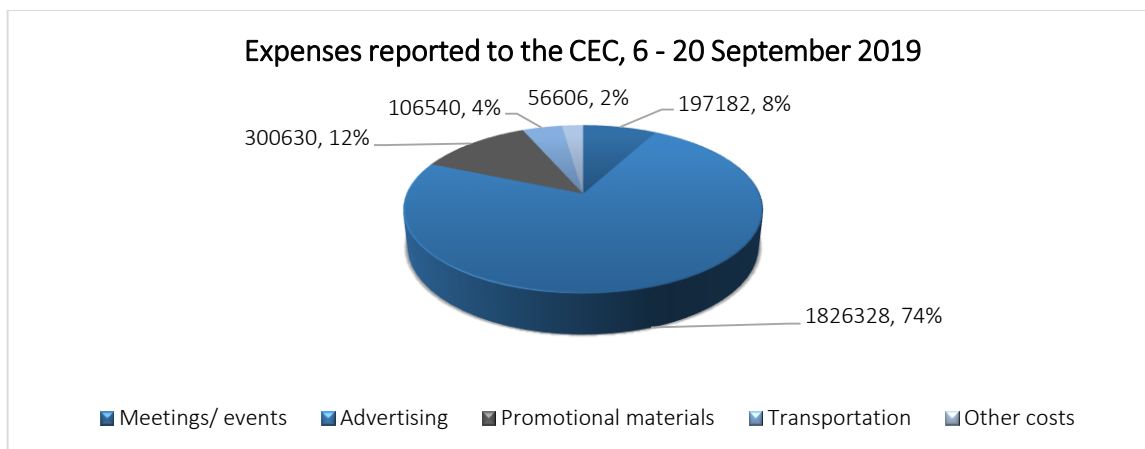
<sup>58</sup> Report submitted on September 20, 2019. <https://bit.ly/2muERTC>

<sup>59</sup> PDM report submitted to the CEC at the beginning of electoral campaign. <https://bit.ly/2lv6Tyl>

As for the expenses reported to the CEC, the major share of expenses declared falls for advertising - 74%, for promotional materials - 12%, for meetings and events - 8%, for the use of transportation - 4%; other expenses - 2% (see chart no. 32).

Analyzing the observers reports for the period of up to 20 September, the Promo-LEX OM finds non-reporting of visible expenses for transportation, maintenance of permanent premises, including territorial offices, public utilities related to rented premises, delegation or secondment of people (including per diem expenses of the observers and volunteers) by four electoral competitors, who submitted reports to the CEC – the PSRM, the PPS, the PDM, the PN. Only one competitor (the PLDM) reported transportation expenses - 106,540 lei and expenses on maintenance of permanent / territorial offices- 50,859 lei.

Chart no. 32



Data obtained from reports submitted to the CEC

## 6.2. Financing of electoral campaigns for the new parliamentary elections

### 6.2.1. Regulating the financing of electoral campaign for the new parliamentary elections

In the new parliamentary election, the rules for financing the electoral campaign remained the ones stipulated in the old wording of Electoral Code<sup>60</sup>. In this context, we find that art. 43, para. (7) is applied differently in both polls (parliamentary and local general), so that for the new parliamentary elections of October 20, 2019, political parties must submit to the CEC an initial financial report stating the means in the current account of the parties at the beginning of electoral period, as opposed to the local elections, where the parties have the obligation to present the report at the beginning of electoral campaign. We remind the reader that the old version of the Regulation on financing of electoral campaigns, adopted by the CEC Decision no. 3352 of May 4, 2015<sup>61</sup> is applied to the elections organized in four single member constituencies.

### 6.2.2. Presentation to the CEC of the report on financial means available in the party's account at the beginning of electoral period

The Promo-LEX OM notes that, similar to the general local elections, five political parties submitted their respective reports. Thus, the PSRM reported at the beginning of electoral period revenues of 11,461,402.95 lei, initial balance (IB) being of 5,035,708.72 lei; the PDM – 28,815,097 lei, IB – 22,509,

<sup>60</sup> See Report no. 1 of the Observation Mission for the general local elections and parliamentary elections of October 20, 2019. Monitoring period: June 18 - August 14, 2019, p. 25-28. <https://bit.ly/2kdDGaw>

<sup>61</sup><https://bit.ly/2ZJWU74>

523.13 lei; the PPS – 10,325,471.88 lei, IB – 25,929.92 lei; ACUM Bloc – 1,497,815.45 lei, IB- 11,490.33 lei; the PVE – 25,354 lei, IB – 69,601.34 lei<sup>62</sup>.

### **6.2.3. Financial reporting of electoral competitors to the Central Electoral Commission**

By 20 September 2019, only two of seven political groups registered as electoral competitors (the PUN, the PDM, the PSRM, ACUM, the PCRM, the PLDM, the PNL) have submitted financial reports to the CEC (the PDM - weeks I, II, III; the PUN – report submitted three days after the opening of the "Electoral Fund" account, week I). Both formations declared "0" revenues and expenses. No independent candidate presented financial reports or information / requests regarding non-execution of expenses.

We remind the reader that previously nine political parties (the PSRM, the PLDM, the PNL, the PVE, the PSE, the PPDA, the PLR, the PDM, the PUN) set up initiative groups (IGs) to collect signatures for their registration in the electoral race and 13 other groups to support independent candidates (Emilia Ristic, Ion Angheluta, Oleg Brega, Lidia Grozav, Alexei Nicolae, Petru Ursu, Tudor Turta, Mihail Boicu, Ilie Rotaru, Carolina Panico, Ion Dron, Vasile Calmațui, Valentin Haraz). Of these, only the IG of the PSRM presented two financial reports to the CEC with "0" revenues and expenses. The other eight political groups (the PLDM, the PNL, the PVE, the PSE, the PPDA, the PLR, the PDM, the PUN) and four IGs for independent candidates (Carolina Panico, Mihail Boicu, Ilie Rotaru, Lidia Grozav)<sup>63</sup> presented information to the CEC on non-opening of bank accounts designated to IGs and non-execution of expenses<sup>64</sup>.

*The Promo-LEX OM ascertains a low degree of transparency in the financing of activities carried out in the signature collection period for the registration of electoral candidates in the new parliamentary elections. Moreover, the financing of electoral campaign in the current elections, so far, seems to be equally non-transparent, given that only two competitors (the PUN, the PDM) of the seven registered have submitted weekly financial reports to the CEC indicating "0" revenues and expenses.*

### **6.3. Expenses of electoral competitors in the general local elections found by Promo-LEX observers and not reflected in the financial reports**

#### *a) Expenses for electoral meetings and events*

Expenses for public events include media advertising and artists' fees, rent of premises, stage, sound equipment, etc. When calculating expenses for electoral events / concerts, we multiplied each artist's fee (market rate) that performed for a certain potential competitor by the de facto time worked.

According to the observers, the PSRM organized three campaign launch activities, making them public (1) on [www.privesc.eu](http://www.privesc.eu), a sanitation action, a sports competition, an event for children, a concert dedicated to the village day and an entertainment concert, a movie screening<sup>65</sup> and electoral meetings in all districts of the country, having estimated expenses of at least 238,005 lei. The PPS organized three celebrations for the elderly under the name "Golden Age"<sup>66</sup> providing festive meals, with estimated costs

<sup>62</sup> Party reports at the beginning of the electoral period for new parliamentary elections. <https://bit.ly/2m8X48R>

<sup>63</sup> IGs' requests in support of independent candidates published on the official page of the CEC. <https://bit.ly/2lZABv3>

<sup>64</sup> Reports and requests of political groups published on the official page of the CEC. <https://bit.ly/2kZjtFt>

<sup>65</sup> Artists Mihai Budurin, Doina Gherman, Olesia Olteanu, the band "DoReDos", Liliiana Bradu, as well as six animators performed at the concert organized on the occasion of the celebration. In the municipality of Balti, the PSRM organized - an artistic event / concert with the involvement of local artists and at least three entertainers; a tent was installed, sweets were given out to children; there were two entertainment events for at least 100 children with slides, food supply (ice cream, popcorn, sweets) and animators; a movie projection (9,730 lei + 19,460 lei). The PSRM in Criuleni – a campaign launch event and a sports competition (3 871 lei). The candidate registered for the position of mayor Mihail Sclifos (the PSRM) organized a national wrestling competition in Criuleni, held on the town day. The winners received awards: a rooster, a rabbit and a ram. The diplomas and prizes were awarded by Mihail Sclifos. According to the vice-president of Criuleni TO of the PSRM Nicolae Grati, "Mihail Sclifos was in charge of the organization and awards".

<sup>66</sup> In the districts of Edineț, Cimișlia and Taraclia.

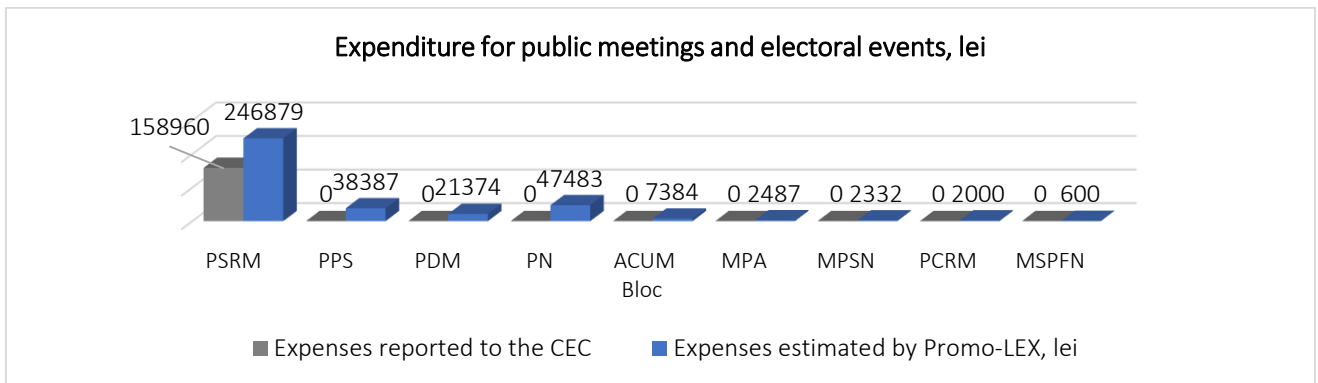
of at least 35,900 lei. The PN - an automotive march, two concerts, one of which was supported by "Renato Usatii" Foundation, three sanitation activities, six electoral meetings, with estimated costs of at least 47,843 lei. The MSPFN - an organizational meeting, with estimated costs of 600 lei. The PCR - restoration and subsequent inauguration of a crucifix<sup>67</sup>, with estimated costs of at least 2,000 lei. The PDM - a concert dedicated to the village day<sup>68</sup>, two launches in the election campaign, with estimated costs of at least 21,374 lei.

*Press conferences:*

The PSRM - five (114 min.); the MPA - one (32 min.), the MPSN - one (30 min.), the MSPFN - one (20 min.), ACUM Bloc - two (95 min.) (See chart no. 33. *Expenditure for public meetings and electoral events, lei*).

According to the calculations of the Promo-LEX OM, the total estimated expenditure for public events is of at least 321,443 lei, only the PSRM reported expenses of 158,960 lei, but the figure is lower than the Promo-LEX estimates. To view the expenses reported to the CEC and estimated by Promo-LEX in each constituency for the PSRM<sup>69</sup>, you can consult the chart below (see chart no. 34. *Expenditure for the events organized by the PSRM segregated by EC*).

*Chart no. 33*

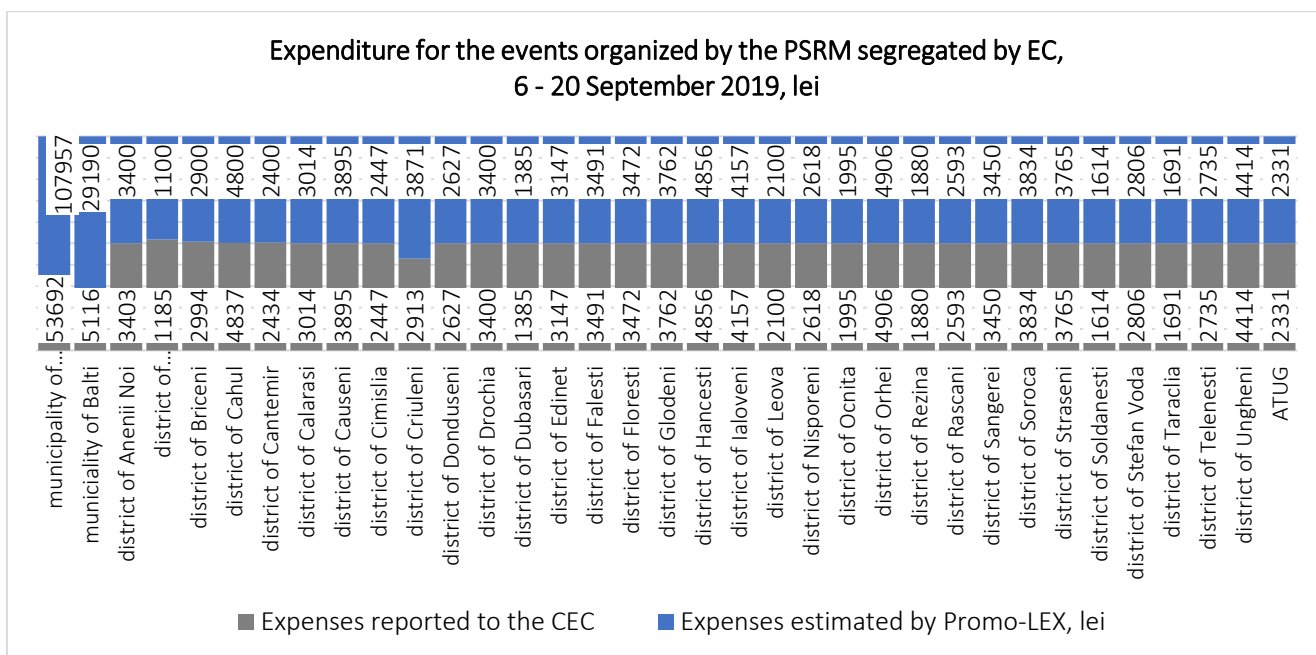


<sup>67</sup> Micauti, district of Straseni.

<sup>68</sup> Varvareuca, the district of Floresti.

<sup>69</sup> Expenses for public events were segregated only for the PSRM, because only this competitor reported expenses incurred in each constituency.





### b) Advertising expenses

#### Expenses for printed advertising materials

Regarding the PSRM, the Promo-LEX observers reported in the municipality of Chisinau newspapers printed in Romanian, order no. 980, the total circulation - 5,000 copies, printed by Edit Tipar Group LLC, paid from the electoral fund account, invoice no. 4 of 09.09.2019; newspapers in Russian, printed on 09.09.2019, order no. 981, the total circulation - 5,000 copies, printed by Edit Tipar Group LLC, paid from the electoral fund account, invoice no. 4 of 09.09.2019; the newspaper "Socialists, the PSRM. The general local elections of 20.10.2019", the date of printing - 13.09.2019, order no. 1 020, a total circulation of 5,000 copies, printed by Edit Tipar Group LLC, paid from the electoral fund, invoice no. 5 of 13.09.2019. There have also been reported flyers of A5 format, color, glossy paper, printed by Arva color LLC, order no. 0795, circulation - 1,000 copies. The estimated costs amount to 78,500 lei.

*There are well-founded suspicions<sup>70</sup> that a larger number of party newspapers was printed in the case of the order dated 13.09.2019, as they were distributed both in the municipality of Chisinau (60 tents reported during the reference period), as well as in Balti (4), in the districts of Basarabasca (1) and Cimisia (1), observers daily reported piles of 100 newspapers stored in visible places in the tents.*

Regarding ACUM Bloc, the PAS component distributed A4 flyers in Romanian, printed by SIMBOL N.P. LLC, based on contract no. 9 of 11.09.19, total circulation - 10,000 copies, having an estimated cost of 30,000 lei.

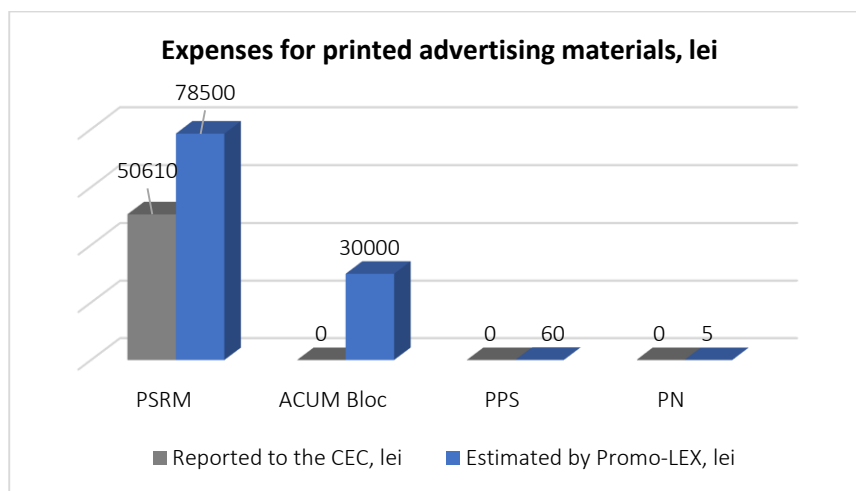
Regarding the PN, there were reported A3 colored posters, without identification data, printed before the opening of the "Electoral Fund" account, with the image of party leader and the message "Renato Usatii will meet with you and provide answers to all your questions", the estimated costs being of five lei.

<sup>70</sup> The suspicions are fueled by the fact that in the previous electoral campaigns, the circulation of newspapers was several tens of thousands of units.

With regard to the PPS, there were reported at least 30 colored A4 posters, without identification data, with an estimated cost of about 60 lei.

Regarding the IG in support of independent candidate Ruslan Codreanu, Promo-LEX observers reported at least 10 t-shirts with the inscription "Sign for Ruslan Codreanu", with estimated costs of at least 2,000 lei (see chart no. 35).

Chart no. 35



#### Expenditure for street and mobile advertising

According to the findings of the Promo-LEX OM, at least seven competitors (the PSRM, the PLDM, the PPS, the PDM, the PN, the USB, the MSPFN) incurred expenses for street panels. According to Promo-LEX estimates, six of them failed to report at least 437,666 lei.

To estimate the expenses for street panels, the OM verified the market prices for various panel samples. Thus, the minimum monthly price for placing a 6 × 9 sq. m. street panel is at least 6,660 lei, for one of 9 × 12 sq. m – 10, 100 lei, for an LED panel - 7,770 lei, for a 3 × 6 sq. m. street panel – 5,441 lei, for a 1.5 × 2 sq. m banner - at least 2,000 lei, for a tent - 800 lei.

Regarding the PSRM, Promo-LEX observers reported at least 91 street panels, 6 tents with at least one volunteer installed for about 10 days<sup>71</sup>. The amount of the estimated expenses is at least 368,991 lei.

Regarding the PN, Promo-LEX observers reported at least 26 6 x 3 sqm billboards, three LED panels, three 2 x 3 sqm billboards, seven 2 x 2 sqm banners, a 6 x 9 sqm billboard, involving estimated costs of 149,617 lei.

Regarding the PPS, Promo-LEX observers reported at least seven 2 x 4 sqm banners; a city light installation, involving estimated costs of 17,099 lei<sup>72</sup>.

Regarding the PDM, Promo-LEX observers reported at least one banner of 6 x 9 sqm, involving estimated costs of 1,943 lei.

<sup>71</sup> Chisinau municipality - at least twenty 6 x 3 sqm billboards, three 6 x 3 sqm truck panels, three LED panels, three 9 x 8 sqm billboards, twelve 3 x 3 sqm banners, ten 2 x 2 sqm banners, four 3 x 4 sqm billboards; having estimated costs of 240,748 lei. Balti municipality - at least eight 6 x 3 sqm billboards, six 2 x 2 sqm banners, with an estimated expenditure of 55,183 lei. In the other districts - another 36 street panels.

<sup>72</sup> In Orhei, at least one 3.4 x 2.3 square meter city light installation was observed, in Balti - seven 2 x 4 square meters banners.

Regarding the USB, Promo-LEX observers reported two 1 x 2 sqm banners, in Chisinau, involving estimated costs of 2,137 lei.

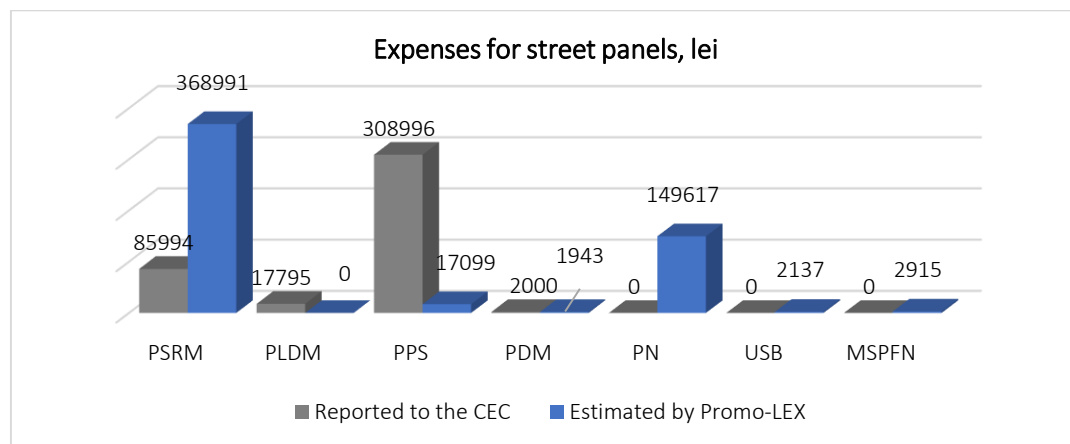
Regarding the MSPFN, Promo-LEX observers reported a 6 x 3 sqm billboard in the Soroca district, involving estimated costs of 2,915 lei.

Regarding the initiative group in support of Ruslan Codreanu (IC), in the period of collecting signatures in the municipality of Chisinau (10 days) observers reported two LED console panels, two 2 x 1.5 sqm street banners, a tent, involving estimated expenses of 7,042 lei.

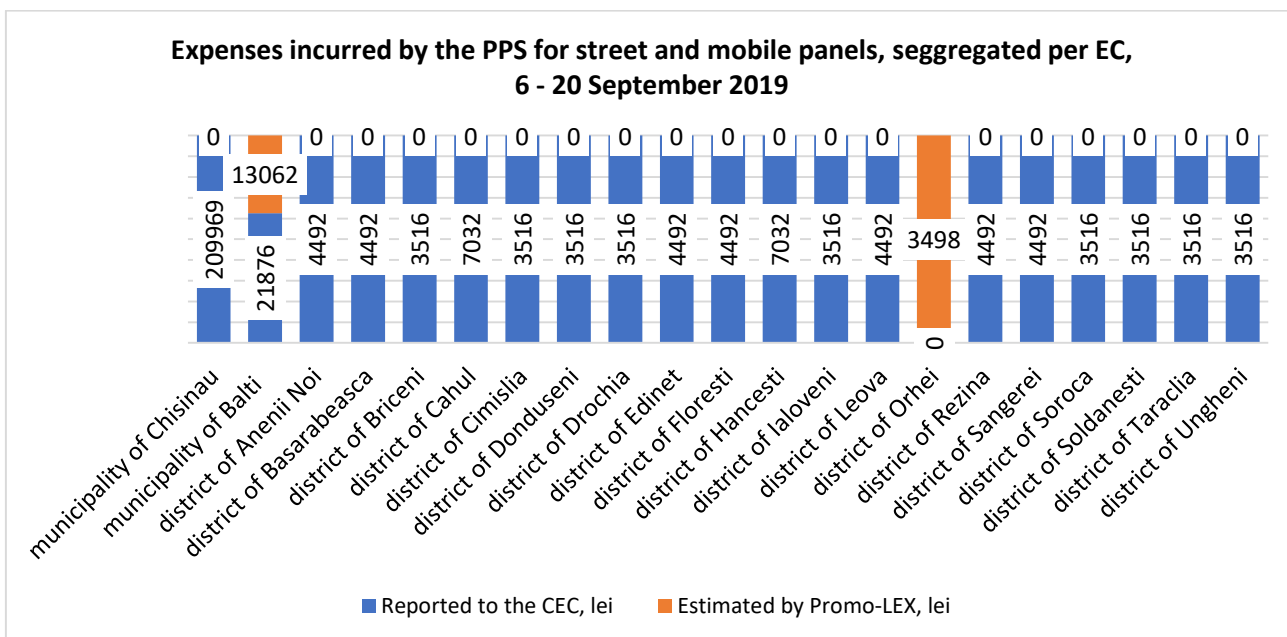
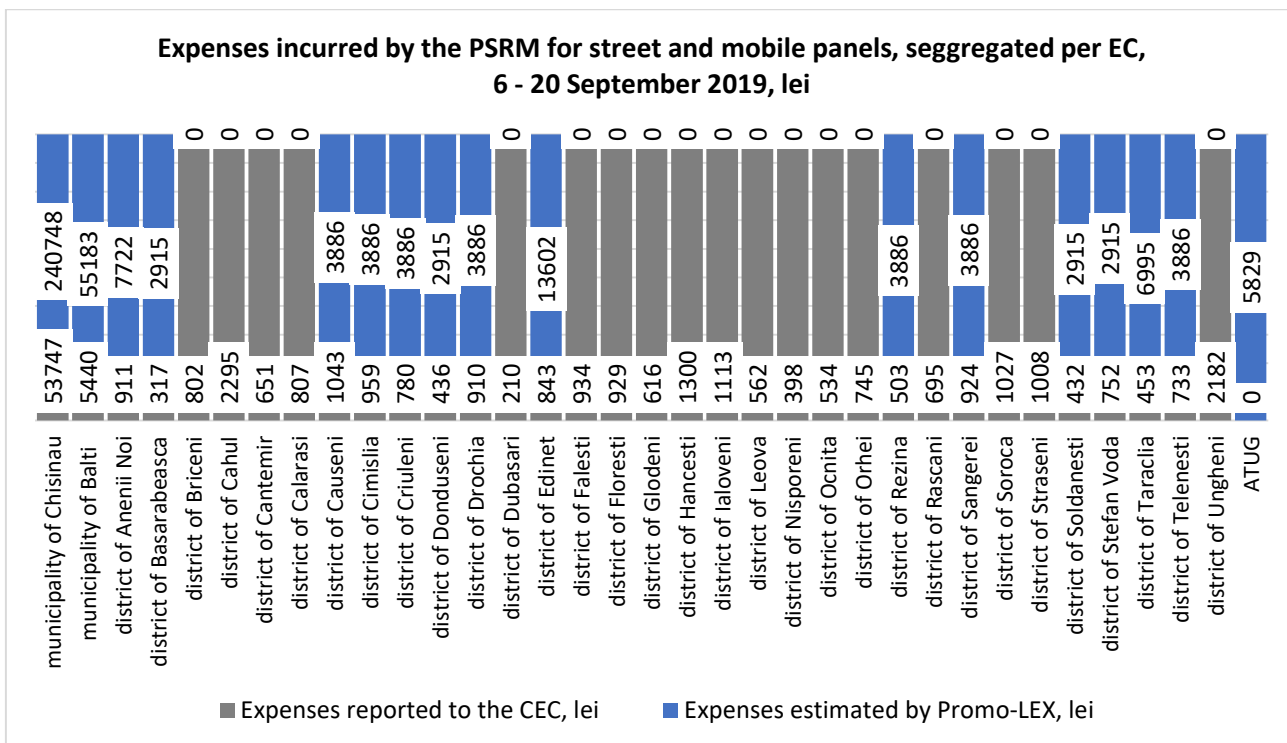
Regarding Constantin Cojocaru (IC), Promo-LEX observers reported a 6 x 3 sqm billboard in Edineț, involving estimated costs of 3,886 lei.

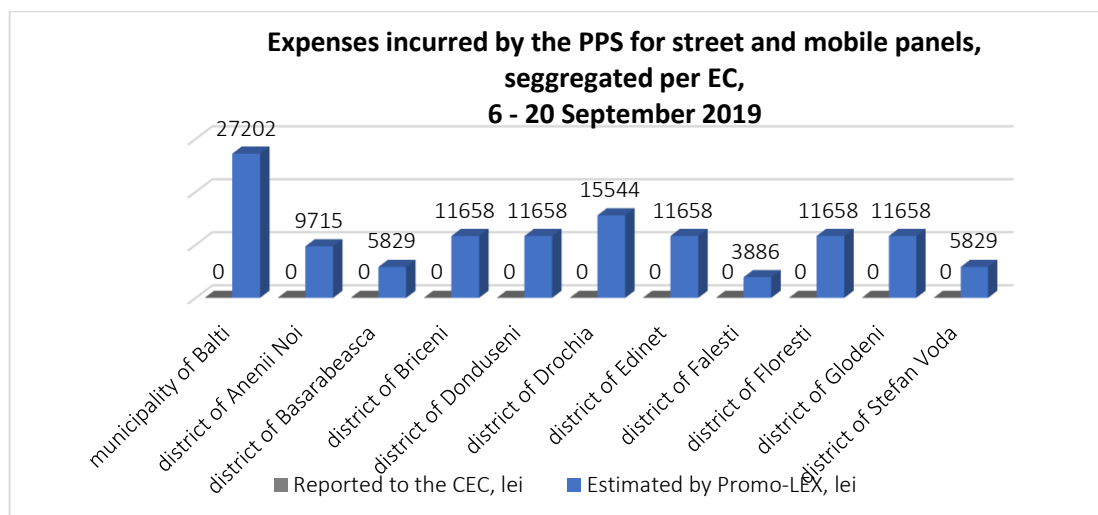
According to the estimates of the Promo-LEX OM for street and mobile advertising, in its financial reports, the PSRM did not reflect at least 282,997 lei, the PN – 149,617 lei, the USB – 2,137 lei, the MSPFN - 2,915 lei, the initiative groups to support Ruslan Codreanu (IC)- 7,042 lei, C. Cojocaru (IC) - 3,886 lei (see chart no. 36). To view the expenses reported to the CEC and estimated by Promo-LEX in each constituency for the PSRM, the PPS and the PN<sup>73</sup>, see the charts below (see charts no. 37, 38, 39).

Chart no. 36



<sup>73</sup> The expenses for public events were segregated only in the case of the PSRM, because only this competitor reported expenses incurred in each constituency.





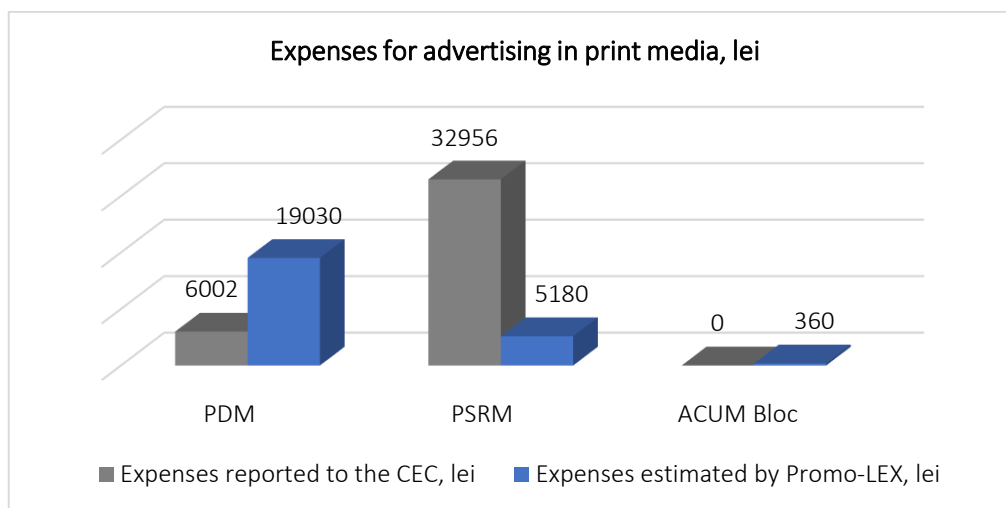
*Expenses for advertising in print media*

Promo-LEX observers reported electoral advertising in print media of three electoral competitors (the PDM, the PSRM and ACUM Bloc), estimating a total amount of 24,570 lei.

Regarding the PDM, observers reported at least four articles in the publications "Gazeta de Sud" (Cimislia) and "Ziarul nostru" (Soroca), estimating expenditures of 19,030 lei.

Regarding the PSRM, observers reported at least two articles in the publication "Ziarul nostru" (Soroca), estimating expenses of 5,180 lei.

Regarding ACUM Bloc, observers reported at least one article in the publication "Est-Curier" (Criuleni), estimating expenses of 360 lei (see chart no. 40).



### *Expenses for online advertising*

By September 20, 2019, the Promo-LEX OM found cases of online advertising - official pages of candidates, sponsored pages on Facebook, online banners on multiple portals, video spots in the case of six electoral competitors (the PSRM, the PN, the USB, the PUN, the MSPFN, the PSE). Only two competitors (the PSRM, the PN) indicated expenses in this category, which, however, are lower than the estimates of Promo-LEX. Expenses estimated as unreported amount to at least 239,581 lei.

To estimate the cost of sponsored publications on Facebook we multiplied the number of sponsored publications by the price of 6 euros (117 lei) and the number of days when the publication was observed. In order to estimate the cost of online banners, the number of online advertising houses that have the platforms mentioned below has been multiplied by the price of 3,500 euros per month (68,007 lei).

Regarding the PSRM candidate in the municipality of Balti, Promo-LEX observers reported at least 10 sponsored publications on Facebook, the estimated expenses being 11,700 lei.

Regarding the PSRM candidate in the municipality of Chisinau, Promo-LEX observers reported the existence of an official website [www.ionceban.md](http://www.ionceban.md) and at least 13 sponsored publications on Facebook, online banners on at least four different portals, all circulating for at least 14 days: [www.gismeteo.md](http://www.gismeteo.md), [www.varlamov.ru](http://www.varlamov.ru), [www.unimedia.md](http://www.unimedia.md) - banners of 1000 x 250 px; [www.agora.md](http://www.agora.md) - banner of 1000 x 250 px, five video spots of 30 sec. each and a video spot of 4 min. 40 sec. The estimated expenses amount to at least 277,315 lei.

Regarding the PN candidate in the municipality of Balti, Promo-LEX observers reported at least five sponsored publications on Facebook, that lasted for 10 days, the estimated expenses being at least 5,850 lei.

Regarding the PN candidate in the municipality of Chisinau, Promo-LEX observers reported four sponsored posts on Facebook that lasted for 10 days and a 60-second election video spot. The estimated expenses amount to at least 14,395 lei.

Regarding the USB candidate in the municipality of Chisinau, Promo-LEX observers reported seven sponsored posts on Facebook that lasted for 10 days. The estimated expenses amount to at least 9,583 lei.

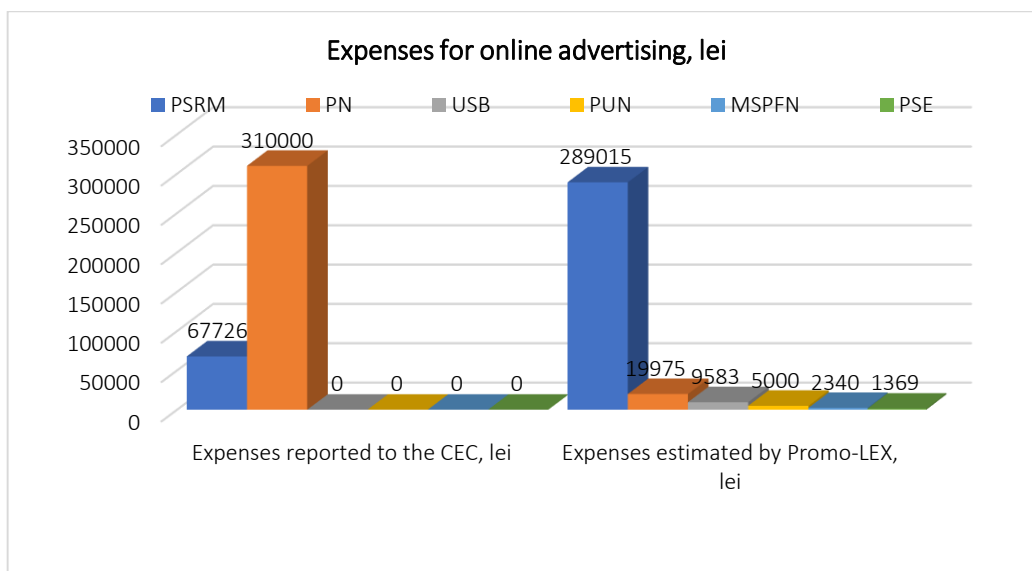
Regarding the PUN candidate in Ungheni district, Promo-LEX observers reported an official website, <https://www.mihaigoian.com/>, a classic small online banner. The estimated expenses amount to at least 5,000 lei.

Regarding the MSPFN candidate in the municipality of Chisinau, Promo-LEX observers reported at least three sponsored publications on Facebook that lasted for 10 days. The estimated expenses amount to a minimum of 2,340 lei.

Regarding the PSE candidate in the municipality of Chisinau, Promo-LEX observers reported at least a sponsored Facebook post that lasted for 10 days. The estimated expenses amount to 1,369 lei.

Regarding the PUN candidate in the municipality of Balti, Promo-LEX observers reported a sponsored post on Facebook lasting for 10 days. The estimated expenses amount to at least 1,369 lei (see chart no. 41).

Chart no. 41



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 six electoral candidates. Only one competitor – the PLDM - indicated such expenses in the reports submitted to the CEC. Of the six electoral competitors, four (the PSRM, the PPS, the PDM, the PN) reported to the CEC "0" expenses, and another electoral competitor did not submit a report to the CEC (ACUM Bloc). The estimates of Promo-LEX OM show that they failed to report an amount of at least 44,988 lei.

The calculation formula used by the OM reflects the multiplication of an average consumption of 9 l / 100 km (car), 10 l / 100 km (minibus), 35 l / 100 km (bus) by the distance traveled and by the fuel price of 18.78 lei (see chart no. 42).

Chart no. 42

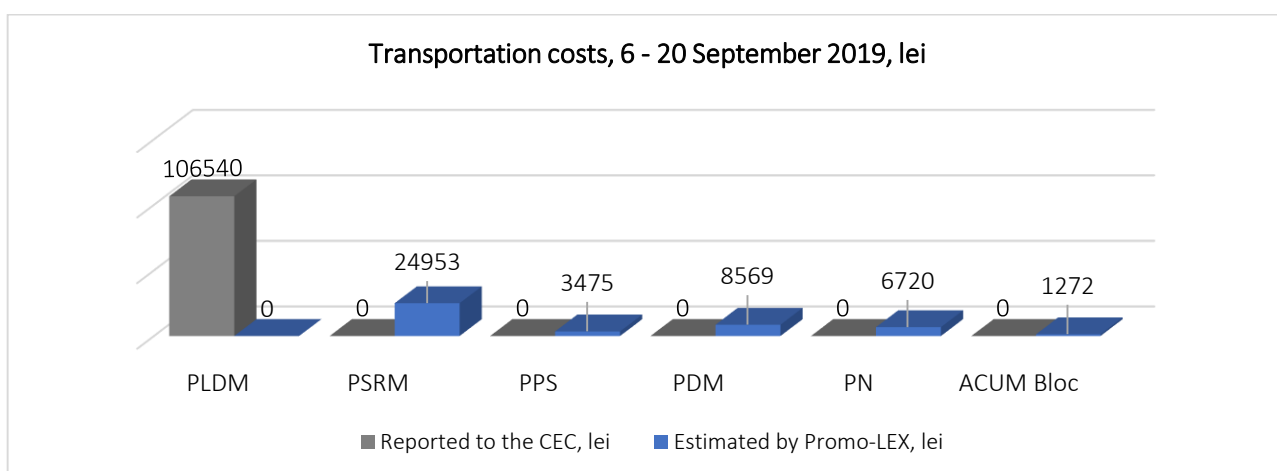
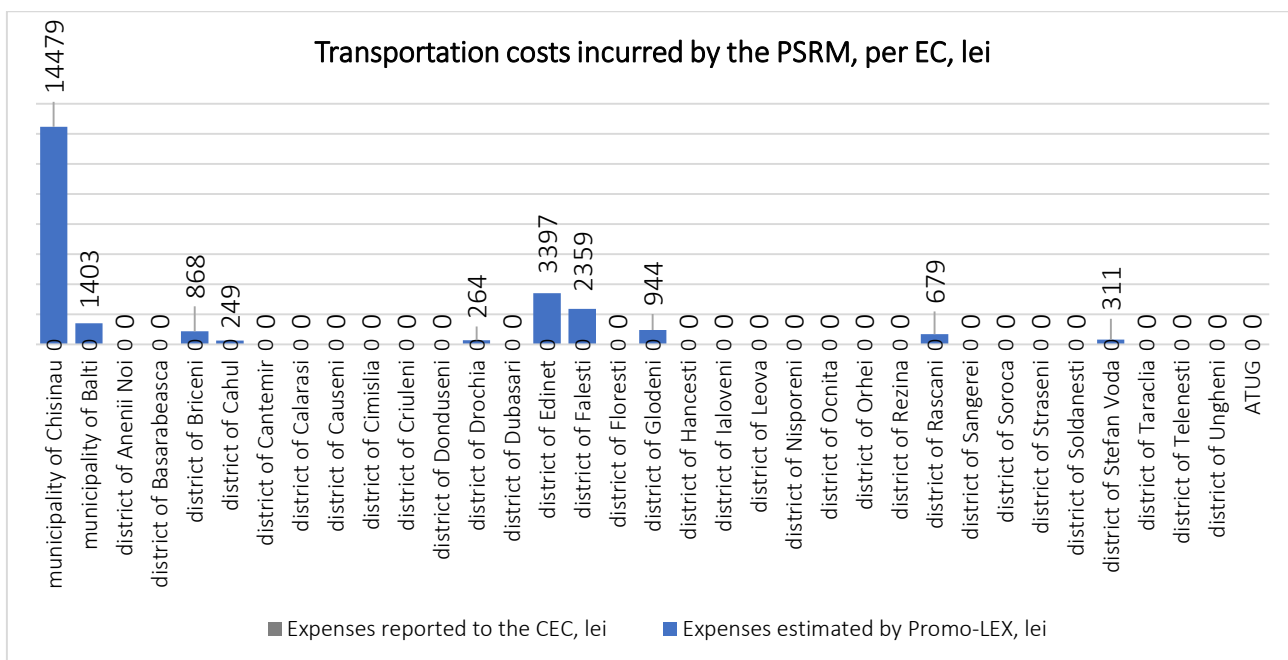
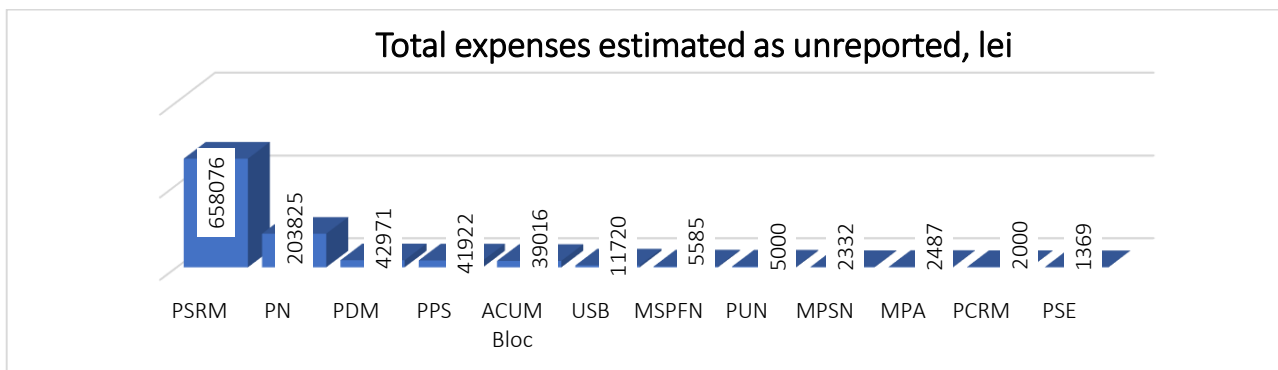


Chart no. 43



The Promo - LEX OM notes that 12 electoral competitors have omitted to fully reflect their expenses incurred in the period of 6- 20 September 2019: the PPS, the PSRM, the PDM, the PN, the USB, the MSPFN, the PUN, the MPSN, the MPA, the PCRМ, ACUM Bloc, the PSE. Moreover, the OM found that the expenditures for electoral purposes were made outside the "Electoral Fund" account by the PCRМ, ACUM, the MSPFN, the MPA, the PSE. The total unreported amount is estimated at 1,016,303 lei.

Chart no. 44





## VII. HATE SPEECH

*Based on the information reported by the monitors, we identified at least five cases in which electoral competitors generated discriminatory messages or other forms of intolerance in the public space, of which: the PL - two cases, and ACUM, the PN and the PLDM one case each.*

*On the other hand, the competitor targeted by hate speech is that of the PPS.*

*Analyzing the situation in terms of criteria underlying hate speech, we noticed that in two cases, gender prejudices and stereotypes were used, and in other two - prejudices related to people's ethnicity. Additionally, we identified a case involving intolerance to LGBT people and to people with mental disabilities, in one situation, incitement to violence was registered.*

### 7.1. Candidates that resorted to hate speech

During the monitoring period, there were at least five situations, where candidates generated hate speech or incitement to discrimination, causing intolerance in the society by inciting discrimination, denigration, incitement to violence, promoting stereotypes and prejudices in the public space.

1. On September 24, 2019, the PLDM candidate for the position of local councilor in Causeni, Anatolie Focsa, posted on his Facebook page a message, expressing intolerance to LGBT people, associating them with rapists, thus denigrating electoral competitors representing ACUM Bloc:

"Having decided to promote a homosexual, ACUM (PAS) in Causeni also promotes a rapist, who escaped punishment, being forgiven by the victim. Homosexuals, rapists, scammers etc. ... ACUM, is this all your potential?"<sup>74</sup>

2. On 10.09.2019, in a press conference organized to present the PN candidate to the position of mayor of municipality of Chisinau, Ivan Diacov said:

"I want all of these cockroaches from the city hall and the institutions belonging to it, which operate in the municipality to be removed, because they take tribute from everything, they milked the institutions... Go to the Central Square, there is a crowd of gypsies there, you cannot pass through ..."<sup>75</sup>

Ivan Diacov uses derogatory terms, like "cockroaches" to humiliate and dehumanize political competitors. At the same time, he appeals to stereotypes related to Roma people, associating the disorder in the Central Square of Chisinau with a "crowd of gypsies".

3. On 05.09.2019, Dorin Chirtoaca, the PL candidate for the position of mayor of Chisinau, made the following statements, addressed to Andrei Nastase:

"Mr. Nastase, you have no say in the matter. Maia Sandu announces that you will run for the mayor's office, she either wants to get rid of you in the Government or she's taken the decision for you ?!"<sup>76</sup>

The statement is based on gender biases. Dorin Chirtoaca tries to ridicule Andrei Nastase, suggesting that a woman (Maia Sandu) made the announcement about Mr. Nastase running in the general local elections in Chisinau, which should be shameful for a man.

4. In a live on his Facebook page of September 18, 2019, Dorin Chirtoaca made the following statements addressing his political opponents Igor Dodon, Maia Sandu and Andrei Nastase:

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<sup>74</sup> <https://bit.ly/2mUBh5j>

<sup>75</sup> <https://bit.ly/2lqI4Dw>

<sup>76</sup> <https://bit.ly/2mRLTBT>

"How cynical you must be to spit in the face of all people and, at the same time, to claim that you are implementing reforms. This is outrageous, you can't do it. That's why we should go into the Great National Assembly Square with forks and chase them away because they're stealing our future ... they are a gang that nested in power to protect themselves.<sup>77</sup>"

The statements of the PL candidate for the position of mayor of Chisinau instigate violence against political opponents and are dangerous and inadmissible in a democratic society.

5. During the event dedicated to the launch of ACUM Bloc in the electoral campaign for the local elections of October 20, 2019, the PPPDA vice-president Alexandru Slusari declared:

«Потом были 3 тяжелейших года борьбы с диктатурой одного неадекватного человека ... Но и в этих условиях Нэстасе не побоялся идти в 2018 году на выборы в столицу, на один год, без поддержки муниципальных советников, под улюлюканье кучи купленных аналитиков и экспертов, которые наперебой трещали о втором туре между Чебаном и подругой Плахатнюка - Мадам Феноса.<sup>78</sup>»

The message targeting Silvia Radu, a former electoral competitor in the local elections of May 20, 2018, is based on gender prejudices and stereotypes related to women in politics. Thus, Alexandru Slusari refers to two former electoral competitors (Ion Ceban and Silvia Radu), Silvia Radu is labeled as "Plahotniuc's friend", diminishing her political capabilities and the label "Madam Fenosa" is used to ridicule Silvia Radu, the word "madam", being used in an ironical sense, relates to the candidate's gender, although such an aspect is not relevant in the context of the speech.

### **Candidates targeted by messages inciting hatred or discrimination**

1. On 11.09.2019, a message addressed to the candidate of the SOR Party running for the position of mayor of Chisinau was placed on the Facebook profile of Minodora Prisacu, the message reads as follows:

"And while (IS) is missing, Tauber keeps the place for him in Orhei, she takes care that the flock does not forget about the Jewish bastard and tries to increase the number of sheep and rams ... And if it still stinks in Chisinau, Tauber thought that, no one would notice that another piece of shit, named Klimenko Valera, is running for the mayor of the municipality. The man is in full climax, both physically and mentally! But Klemenko-Climax does not give up the idea of getting us under Russia, he dreams of taking Dodon's place, he wants his place so badly that as soon as he finds someone who would listen to him, his sings of his love for the Russians!<sup>79</sup>"

The message contains anti-Semitic expressions ("Jewish bastard") referring to Ilan Sor, insulting, derogatory and humiliating expressions referring to Valeriu Klimenko, which allude to his mental deficiencies, thus spreading intolerance towards people with mental disabilities. The message became popular on Facebook, gathering about 50 shares and over 200 likes.

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<sup>77</sup> <https://bit.ly/2mrAgBx>

<sup>78</sup> <https://bit.ly/2mvV1Mh> The text in Russian is translated as follows: "Then there were 3 difficult years of struggle under the dictatorship of an inadequate man ... But even in these conditions, Nastase was not afraid to run for the mayor's office in the capital in 2018, only for one year, having no support from the municipal councilors, under the hooting of paid analysts and experts who spoke about the second round between Cheban and Plahatniuc's friend - Madame Fenosa".

<sup>79</sup> <https://bit.ly/2lrSSkF>

## VIII. VOTER EDUCATION CAMPAIGN

*The CEC and CICDE continued a series of activities to inform voters and train electoral officials. We appreciate the use of sign language in information materials. We consider that voters who will be abroad on the day of election and those residing in Transnistrian region need more detailed information on the new parliamentary elections. Several categories of civil servants have been trained during the monitoring period, including: members of EC, PEB members, operators.*

### 8.1. CEC and CICDE activities

*Election information campaign.* To raise the voter awareness and increase voter participation in the local elections of October 20, 2019, the CEC released a video spot,<sup>80</sup> in which voters are urged to participate in the poll and vote for their candidate.

The CEC has also developed video graphics, available in sign language<sup>81</sup>, describing the process of drawing up, printing and use of ballot papers. In the context of the International Day of Sign Language, marked on 23 September, the CEC encouraged, including through this video graphics, the use of sign language in informative materials, so that every citizen holding voting rights has access to information and data on electoral processes.

On 13 - 15 September,<sup>82</sup> the CEC held the VotART creative workshop<sup>83</sup> - a creative contest in graphic design or illustration for 30 young and talented people, who made motivational electoral posters<sup>84</sup>. The created posters will be distributed across the country in the coming elections to motivate citizens to vote.

On September 9, 2019, the CICDE re-launched activities involving young and future voters<sup>86</sup>, aiming at electing on 27 September, student councils in approximately 50 schools in 13 districts, following the model developed by the CICDE. The activity combines practical sessions with theoretical ones, in which students act like voters, members of electoral bodies or observers.

*Training of lower electoral bodies.* On 6 September, the training of electoral council operators took place. CEC IT experts introduced the operators to their responsibilities while working with voters' lists throughout the electoral process.

In the period of 9-14 September, 2019, seminars were held to train members of level 1 electoral councils, and in the period of 24 September - 5 October, PEB members were trained. On 12 September, the training of EC accountants began, and on 21 September, persons in ECs responsible for receiving financial reports of independent candidates were trained, being familiarized with methods and tools to examine the data and reports on revenues and expenses incurred in the electoral campaign for the general local elections of October 20, 2019.

As far as self-training is concerned, the CICDE developed an online platform<sup>87</sup> that offers training in the electoral field, where EC and PEB members can remotely carry out tests on electoral matters, for the smooth running and organization of the new general local and parliamentary elections this autumn.

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<sup>80</sup> Video spot. <https://bit.ly/2kDyQ6m>

<sup>81</sup> Video graphics in sign language. <https://bit.ly/2l3Ecs4>

<sup>82</sup> CEC press release. <https://bit.ly/2l3kOvg>

<sup>83</sup> VotART event. Creative workshop in the electoral field. <https://bit.ly/2kKYR3S>

<sup>84</sup> Young people's creations. <https://bit.ly/2mDg3J1>

<sup>85</sup> VotART event. <https://bit.ly/2mlQDzm>

<sup>86</sup> CICDE press release. <https://bit.ly/2l36fb6>

<sup>87</sup> <http://e-learning.cicde.md/toate-cursurile/>

## **RECOMMENDATIONS**

### **To the Central Electoral Commission and lower electoral bodies:**

1. Assuming an active role to efficiently solve the appeals and notifications, applying all the legal instruments, and avoiding declining the appeal for non-competence reasons.
2. Clear and explicit regulation of the mode of filing appeals by the *applicants* to an elective position - mayor or councilor- (potential candidates not yet registered) against the actions of other claimants to the elective position/ initiative group during the signature collection period or against the actions / inactions of electoral bodies and the regulation of deadlines for solving the appeals.
3. Express delimitation of appeals and notifications filed, the manner and the deadlines for their resolution, or unification of practices of solving any application regarding the violations invoked.
4. Elucidation of legal status of the applications / notifications / requests filed in electoral period, as well as of the terms and manner of their settlement.
5. Elaboration of a circular letter addressed to the PEBs in the SMC no. 17 and no. 33 on the application of legal norms regarding the availability of voters' lists for the representatives of electoral competitors in the local elections and for the representatives of electoral competitors in the new parliamentary elections.
6. Revision of the cases of registration of candidates' lists drawn up without respecting the 40% gender quota.
7. 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, for example, Excel and subsequently publishing them on the official webpage of the CEC, so that the data can be used for analysis by the experts in the field, media and academic environment.
8. Verification, in accordance with the legal provisions, of the origin of electoral competitors' revenues, to avoid forgery, either by using the CCE or by issuing invoices.
9. Making accountable the IGs opened to support candidates in the new parliamentary elections and registered electoral competitors who did not submit financial reports.
10. Making accountable electoral competitors registered for the general local elections for their failure to submit mandatory financial reports.
11. Publication of the financial reports filed by independent candidates in the general local elections on the official webpages of DEC and LPAs.
12. Providing an answer to the requests to clarify the normative regulations in the electoral field submitted by the Promo-LEX OM to ensure a good organization of the elections as well as correct and timely training of observers.
13. Careful examination of the files submitted for candidates' registration considering the minutes on candidates' designation, drawn up by the bodies of political parties or electoral blocs.

### **To the Local Public Administrations**

14. Ensuring the publication of information about the candidates registered in the local elections of October 20, 2019 in the area of their responsibility on their webpages.

## Abbreviations

ACUM Bloc – “ACUM: DA and PAS Platform” electoral Bloc  
art. - article  
ATU - administrative-territorial unit  
ATUG - Autonomous Territorial Unit of Gagauzia  
CCE – Cash and Control Equipment  
CEC - Central Electoral Commission  
CICDE – Center for Continuous Electoral Training  
CMC - Chisinau Municipal Council  
DEC – District Electoral Council of level II  
EC – electoral council of level I  
FB- final balance  
IB- 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 - "Speranța - Nadejda" Professional Movement, Political Party  
MSPFN - "New Force" Social-Political Movement, Political Party  
mun. - municipality  
no. - number  
OM - observation mission(s)  
OSCE - Organization for Security and Cooperation in Europe  
OSCE / ODIHR - OSCE Office for Democratic Institutions and Human Rights  
PAD – Party of Democratic Action  
para. - paragraph  
PAS – 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 Party  
PSM - Socialist Party of Moldova  
PSRM - Party of Socialists of the Republic of Moldova

PUN - The Party of National Unity  
PVE - Green Ecologist Party  
REO - Registry of Electoral Officials  
SMC - Single Member Constituency  
SMCC - Single Member Constituency Council  
SRP - State Registry of Population  
SRV - State Registry of Voters  
STO - short-term observer  
UNDP - United Nations Development Program  
USAID - United States Agency for International Development  
USB - Union Save Bessarabia, Political Party

**ANNEX**

**Cases that can be qualified as deviations from the provisions on drawing up of lists based on gender quota**

***List of DEC's that registered competitors with deviations from the provisions on gender quota***

<i>District</i>	<i>DEC II</i>	<i>Candidates</i>	<i>Candidates of the same gender</i>
Chisinau	1	PCRM	37.14%
Anenii Noi	4	PSRM	39.39%
		PDM	39.39%
Basarabasca	5	PCRM	23.53%
		PN	38.10%
Briceni	6	PSRM	39.39%
		PPS	39.29%
Calarasi	9	PPS	60.71%
Drochia	14	PSRM	37.50%
		PUN	36.36%
Dubasari	15	PCRM	31.58%
Edinet	16	PSRM	39.47%
		PUN	23.53%
Floresti	18	ACUM	39.39%
Glodeni	19	PSRM	39.39%
Hincesti	20	PSRM	39.39%
Hincesti	20	PPS	37.14%
Leova	22	PSRM	39.29%
		PPS	61.90%
Ocnita	24	PPS	38.89%
Rezina	26	PPEM	37.50%
Riscani	27	PSRM	39.39%
Singerei	28	PCRM	38.46%
Soroca	29	PLDM	38.89%
		PSRM	36.36%
Straseni	30	PSRM	38.10%
Soldanesti	31	PCRM	35.71%
		PVE	62.50%
Telenesti	34	PPS	65.22%
Ungheni	35	PDM	38.89%

***List of EC's that registered competitors with deviations from the provisions on gender quota***

<i>District</i>	<i>DEC</i>	<i>Settlement</i>	<i>EC</i>	<i>Candidate</i>	<i>Candidates of the same gender</i>
Anenii Noi	4	Calfa	no. 4/4	PDM	33,33%
Briceni	6	Marcauti	no. 6/20	PSRM	36,36%
		Mihaileni	no. 6/22	PSRM	36,36%
		Trebisauti	no. 6/28	PPS	23,08%
		Trebisauti	no. 6/28	PSRM	36,36%
		Balcauti	no. 6/5	PSRM	36,36%
		Balcauti	no. 6/5	PPS	66,67%
Cahul	7	Caracusenii Vechi	no. 6/9	PSRM	38,46%
		Burlaceni	no. 7/12	PN	36,36%

Cantemir	8	Cantemir	no. 8/1	PSRM	30,30%
		Cantemir	no. 8/1	PDM	31,25%
		Stoianovca	no. 8/22	PSRM	63,64%
		Chioselia	no. 8/6	PSRM	62,50%
		Ciietu	no. 8/8	PSRM	62,50%
Calarasi	9	Calarasi	no. 9/1	PLDM	36,84%
		Calarasi	no. 9/1	PCRM	35,71%
		Paulesti	no. 9/15	ACUM	37,50%
		Paulesti	no. 9/15	PDM	63,64%
		Pitusca	no. 9/17	PPS	62,50%
		Pitusca	no. 9/17	PDM	37,50%
		Pitusca	no. 9/17	PSRM	63,64%
		Sipoteni	no. 9/23	PSRM	37,50%
		Temeleuti	no. 9/24	ACUM	33,33%
		Temeleuti	no. 9/24	PPS	62,50%
		Tuzara	no. 9/25	PSRM	37,50%
		Tuzara	no. 9/25	PUN	33,33%
		Causeni	10	Tanatarii-Noi	no. 10/23
Ursoaia	no. 10/26			PCRM	36,36%
Baccealia	no. 10/3			PCRM	62,50%
Baccealia	no. 10/3			PSRM	61,54%
Cimislia	11	Lipoveni	no. 11/14	PSRM	63,64%
		Valea Perjei	no. 11/23	PCRM	28,57%
		Batir	no. 11/3	PPS	62,50%
Donduseni	13	Tirnova	no. 13/21	PSRM	38,89%
		Tirnova	no. 13/21	PSRM	38,89%
		Taul	no. 13/22	PLDM	38,46%
		Taul	no. 13/22	PSRM	36,36%
Drochia	14	Drochia	no. 14/1	PSRM	39,29%
		Cotova	no. 14/5	PDM	33,33%
Dubasari	15	Cocieri	no. 15/1	PSRM	38,46%
		Corjova	no. 15/2	PCRM	38,46%
Falesti	17	Falesti	no. 17/1	PSRM	39,13%
		Falesti	no. 17/1	PPS	61,54%
		Glinjeni	no. 17/11	PLDM	70,00%
		Glinjeni	no. 17/11	ACUM	35,71%
		Horesti	no. 17/14	PSRM	37,50%
		Horesti	no. 17/14	PPS	80,00%
		Albinetul Vechi	no. 17/2	PLDM	61,54%
		Natalievca	no. 17/21	PSRM	63,64%
		Navirnet	no. 17/22	PSRM	63,64%
		Pietrosu	no. 17/24	ACUM	77,78%
		Pompa	no. 17/27	PSRM	62,50%
		Pompa	no. 17/27	PCRM	37,50%
		Pruteni	no. 17/28	PPS	71,43%
		Taxobeni	no. 17/33	PSRM	36,36%
Chetris	no. 17/7	PPS	66,67%		
Floresti	18	Floresti	no. 18/1	PSRM	39,13%
		Floresti	no. 18/1	PPS	61,90%
		Cosernita	no. 18/10	PSRM	66,67%
		Cosernita	no. 18/10	PNL	33,33%
		Cuhurestii De Jos	no. 18/11	PPS	66,67%
		Cuhurestii De Jos	no. 18/11	PPS	66,67%
		Cuhurestii De Sus	no. 18/12	PSRM	63,64%
		Cuhurestii De Sus	no. 18/12	PSRM	63,64%



		Cuhurestii De Sus	no. 18/12	PSRM	63,64%
		Napadova	no. 18/24	PSRM	33,33%
		Sanatauca	no. 18/31	PSRM	38,46%
		Sanatauca	no. 18/31	ACUM	61,54%
Glodeni	19	Viisoara	no. 19/19	PDM	36,36%
		Viisoara	no. 19/19	PSRM	36,36%
		Cobani	no. 19/6	PDM	37,50%
		Cobani	no. 19/6	PN	66,67%
		Cobani	no. 19/6	ACUM	36,36%
		Cuhnesti	no. 19/7	PLDM	36,36%
		Cuhnesti	no. 19/7	PN	38,46%
		Cuhnesti	no. 19/7	PPS	61,54%
		Cuhnesti	no. 19/7	PDM	36,36%
		Cuhnesti	no. 19/7	PSRM	38,46%
		Dusmani	no. 19/9	PSRM	38,46%
Hincesti	20	Cateleni	no. 20/11	PDM	33,33%
		Cateleni	no. 20/11	PSRM	36,36%
		Cioara	no. 20/12	ACUM	30,77%
		Cioara	no. 20/12	PDM	61,54%
		Crasnoarmeiscoe	no. 20/15	PDM	30,77%
		Crasnoarmeiscoe	no. 20/15	PPS	28,57%
		Leuseni	no. 20/22	PLDM	30,00%
		Leuseni	no. 20/22	PPS	33,33%
		Negrea	no. 20/27	PDM	37,50%
		Nemteni	no. 20/28	PSRM	36,36%
		Nemteni	no. 20/28	PDM	36,36%
		Nemteni	no. 20/28	ACUM	36,36%
		Obileni	no. 20/29	PDM	38,46%
		Poganesti	no. 20/33	PPS	28,57%
		Poganesti	no. 20/33	ACUM	25,00%
		Poganesti	no. 20/33	PDM	38,46%
Voinescu	no. 20/39	PDM	38,46%		
Ialoveni	21	Malcoci	no. 21/11	PLDM	33,33%
		Suruceni	no. 21/20	PSRM	35,71%
		Suruceni	no. 21/20	PDM	33,33%
		Horesti	no. 21/9	PDM	36,36%
Leova	22	Orac	no. 22/14	PLDM	38,46%
		Orac	no. 22/14	PDM	38,46%
		Ceadir	no. 22/7	PDM	36,36%
		Ceadir	no. 22/7	ACUM	27,27%
		Colibabovca	no. 22/9	ACUM	30,00%
Nisporeni	23	Cristesti	no. 23/12	PDM	33,33%
		Iurceni	no. 23/14	PDM	30,77%
		Soltanesti	no. 23/18	PDM	64,29%
		Soltanesti	no. 23/18	PSRM	37,50%
		Soltanesti	no. 23/18	ACUM	33,33%
		Siscani	no. 23/19	PDM	38,46%
		Zberoaia	no. 23/23	PDM	30,77%
		Zberoaia	no. 23/23	PDM	38,46%
		Balauresti	no. 23/3	PDM	36,36%
		Balauresti	no. 23/3	PSRM	33,33%
Balauresti	no. 23/3	ACUM	22,22%		
Ocnita	24	Calarasovca	no. 24/6	PSRM	37,50%
Orhei	25	Ivancea	no. 25/15	PL	37,50%
		Morozeni	no. 25/20	PLDM	36,36%

		Peresecina	no. 25/23	MPA	37,50%
		Trebujeni	no. 25/34	ACUM	33,33%
		Braviceni	no. 25/5	PSRM	36,36%
		Braviceni	no. 25/5	PDM	28,57%
		Braviceni	no. 25/5	ACUM	36,36%
		Braviceni	no. 25/5	PPS	68,75%
		Ciocilteni	no. 25/8	PSRM	38,46%
Rezina	26	Mincenii De Jos	no. 26/15	PCRM	66,67%
		Papauti	no. 26/17	PN	33,33%
		Sircova	no. 26/22	PSRM	36,36%
Riscani	27	Horodiste	no. 27/12	PSRM	66,67%
		Horodiste	no. 27/12	PDM	66,67%
		Duruitoarea-Noua	no. 27/8	PSRM	37,50%
Singerei	28	Singerei	no. 28/1	PLDM	21,43%
		Singerei	no. 28/1	PLDM	21,43%
		Coscodeni	no. 28/11	USB	25,00%
		Coscodeni	no. 28/11	USB	25,00%
		Coscodeni	no. 28/11	PSRM	61,54%
		Coscodeni	no. 28/11	PSRM	61,54%
		Coscodeni	no. 28/11	PSRM	61,54%
		Cubolta	no. 28/13	PSRM	36,36%
		Cubolta	no. 28/13	PSRM	36,36%
		Cubolta	no. 28/13	ACUM	36,36%
		Cubolta	no. 28/13	ACUM	36,36%
		Cubolta	no. 28/13	PAD	66,67%
		Cubolta	no. 28/13	PAD	66,67%
		Dobrogea Veche	no. 28/14	PSRM	36,36%
		Dobrogea Veche	no. 28/14	PSRM	36,36%
		Dobrogea Veche	no. 28/14	PCRM	71,43%
		Biruinta	no. 28/2	PSRM	61,54%
		Radoaia	no. 28/23	USB	33,33%
		Biliceni Noi	no. 28/5	PSRM	36,36%
		Biliceni Noi	no. 28/5	PSRM	36,36%
		Biliceni Noi	no. 28/5	PSRM	36,36%
Soroca	29	Soroca	no. 29/1	PLDM	38,89%
		Soroca	no. 29/1	PSRM	39,39%
		Holosnita	no. 29/11	ACUM	36,36%
		Iarova	no. 29/13	PSRM	37,50%
		Oclanda	no. 29/15	PSRM	36,36%
		Badiceni	no. 29/2	PLDM	37,50%
		Regina Maria	no. 29/21	PSRM	62,50%
		Tatarauca Veche	no. 29/28	PSRM	37,50%
		Visoca	no. 29/33	PSRM	33,33%
Soldanesti	31	Cotiujenii Mari	no. 31/6	PDM	61,54%
		Cotiujenii Mari	no. 31/6	PDM	61,54%
		Cotiujenii Mari	no. 31/6	PDM	61,54%
		Cotiujenii Mari	no. 31/6	ACUM	30,00%
		Cotiujenii Mari	no. 31/6	ACUM	30,00%
		Cotiujenii Mari	no. 31/6	ACUM	30,00%
Stefan Voda	32	Olanesti	no. 32/13	PSRM	38,89%
		Rascaietii	no. 32/17	PSRM	61,54%
		Rascaietii	no. 32/17	PPS	62,50%
		Brezoaia	no. 32/4	PCRM	33,33%
		Copceac	no. 32/8	PSRM	38,46%
		Crocmaaz	no. 32/9	PSRM	38,46%

Taraclia	33	Novosiolovca	no. 33/12	PSRM	63,64%
		Novosiolovca	no. 33/12	PPS	63,64%
		Albota De Sus	no. 33/4	PSRM	36,36%
		Albota De Sus	no. 33/4	PSRM	36,36%
		Albota De Sus	no. 33/4	PSRM	36,36%
		Balabanu	no. 33/6	PSRM	36,36%
		Balabanu	no. 33/6	PPS	66,67%
		Cealic	no. 33/9	PPS	62,50%
Telenesti	34	Inesti	no. 34/16	PSRM	36,36%
		Ordasei	no. 34/21	PDM	36,36%
		Ordasei	no. 34/21	ACUM	38,46%
		Pistrueni	no. 34/22	ACUM	66,67%
		Brinzenii Noi	no. 34/4	PPS	66,67%
		Brinzenii Noi	no. 34/4	PPS	66,67%
Ungheni	35	Napadeni	no. 35/22	PDM	70,00%
		Negurenii Vechi	no. 35/23	PSRM	36,36%
		Boghenii Noi	no. 35/5	PPS	36,36%
ATUG	36	Copceac	no. 36/18	PSRM	31,82%
		Gaidar	no. 36/23	PSRM	35,71%
		Svetlii	no. 36/25	PSRM	38,46%
		Vulcanesti	no. 36/3	PN	39,13%