



REPORT no. 6

Observation Mission

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

Monitoring period: 21 - 30 October 2019

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

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EXECUTIVE SUMMARY

The legal framework. Promo-LEX OM emphasizes two legal issues which, according to the Mission, continue to affect the organization of general local elections, including the second round: first, the Electoral Code does not contain general or special rules regarding the conduct of the second round of local elections, except for the CEC's responsibility to ensure the conduct of the second round and the conditions for the conduct of the second round; second, we find that the special rule by which the right to vote in local elections is conditioned by the voter's domicile and not by his/her residence, is not applied by electoral bodies.

Electoral bodies. To ensure the organization of the second round of general local elections, the CEC approved decisions on the organization and conduct of the ballot. The accreditation of national (62) and international (5) observers continued. It is difficult to analyze the appeals / notifications submitted to the CEC because since October 3, 2019, the Commission has not published on its webpage any of the submitted appeals or decisions issued with regard to them. The Promo-LEX OM draws the readers' attention to three decisions that, in the Mission's view, contain problematic regulations: granting the right to vote at one's place, based on the requests submitted in the first round; the competent authority, the term and the manner in which the day of the second round of elections is established; approving the conduct of opinion polls.

Promo-LEX observers visited all 18 DECAs, finding that all of them were open at the time of the visit. Of the 201 ECs I visited during the working hours, 39 (19%) were closed, and 162 (81%) were open. Compared to ECs I and DECAs, the number of PEBs that respects the working program is lower: of the 342 PEBs visited, 106 (31%) were closed and 236 (69%) open.

The Promo-LEX OM emphasizes the existence of cases of delays in examining the requests for re-counting and the re-counting of ballots itself, which may affect the smooth conduct of the second round of the general local elections.

In this period, the CEC presented the results of the new parliamentary elections of October 20, 2019, and the Constitutional Court confirmed the results and validated the mandates of the newly-elected MPs.

Voters' lists. In the opinion of the Promo-LEX OM with reference to the general local elections of October 20, 2019, there are reasonable suspicions of artificial migration of voters. The analysis of the official data on internal movement of citizens in the period of 19.08.2019 - 10.10.2019 revealed that contrary to the common practice specific to the majority of level I ATUs, in at least 29 settlements, there were at least three requests for residence registration, as well as requests for the registration of domicile.

Additionally, in at least one settlement, where the second round will be organized, observers have identified 7 different notifications from level II ATUs about people registering their residence on one and the same day.

Electoral competitors. On November 3, 2019, the second round of mayoral elections will be organized in 384 constituencies. Most candidates competing in the second round have been nominated by the PSRM (179), the PDM (176) and ACUM Electoral Bloc (169). In terms of direct confrontation, in most constituencies, "the battle" will be held between candidates nominated by the PDM and the PSRM (63), followed by the PDM - ACUM Electoral Bloc (57), as well as the PSRM - ACUM Electoral Bloc (48).

The number of campaign activities in the second round of local elections decreased significantly, dropping to a total of 92, compared to 1014 activities held during the observation period before the first round of elections. The most active competitors in this regard have been ACUM Electoral Bloc (36%), the PSRM (33%) and the PDM (12%). Activities most frequently reported are placement of

electoral posters and distribution of informative materials (49%), as well as conduct of electoral meetings (23%).

The Promo-LEX OM has identified at least four cases, involving PDM candidates, which can be qualified as offering of goods in the electoral campaign (providing road repair services, distribution of foodstuffs, money and clothing).

The Mission reported four situations that can be described as misuse of administrative resources: three electoral meetings held in state institutions during working hours (1 – the PDM and 2 - ACUM); a case (ACUM), which can be described as use of public office in promoting an electoral competitor.

Other campaign activities that can be qualified as deviation from the legal norm refer to claiming merits for the projects implemented at public expense (3 cases – the PSRM); promoting candidates involving the image of personalities from abroad (3 - ACUM); use of electoral advertising in violation of legal provisions (15 cases).

Financing of electoral campaigns. 16 electoral competitors submitted reports to the CEC for the period of 21 - 25 October 2019. Only 6 competitors reported revenues of 190,589 lei. They account for financial donations of 3 natural persons in the amount of 11,720 lei in favor of 3 competitors (the USB, MPSN, PAD); own means - transfers from the current account of three political parties to the electoral fund account (the PDM, PPS, ACUM) in the amount of 178,869 lei. At the same time, 14 competitors reported remaining resources in the initial balance, reaching a total of 2,238,991 lei. Of 16 competitors that submitted reports, 10 competitors reported expenses of 1,255 069 lei, declaring a final balance of 1,174,504 lei. The major share of declared expenses accounts for advertising - 1,139,554 lei (71%); promotional materials – 408,321 lei (26%); transportation – 38,550 lei (2%); other expenses -17,849 lei (1%).

Following the civic monitoring activity, the Promo-LEX OM found that 4 electoral competitors (the PSRM, ACUM, the PDM, Victor Sau (I.C)) failed to fully reflect the expenses incurred in the period between 21- 25 October, 2019. The total estimated unreported amount is of at least 20,063 lei.

Hate speech. According to the information reported by the observers, the OM found at least five cases in which electoral competitors generated discriminatory messages or displayed other forms of intolerance in the public space, of which: the PN has been involved in three situations, and ACUM Bloc in two situations.

On the other hand, the OM identified at least three cases, where competitors were targeted by hate speech - two cases referring to the PSRM candidate - Ion Ceban and a case, targeting the candidate of ACUM Bloc - Andrei Nastase.

Cumulating the criteria underlying hate speech cases, we note that five of them are based on prejudices against mentally challenged people, four cases involve denigration and dehumanization, which are based on political affiliation of electoral candidates, intolerance to LGBT people and prejudices for religious beliefs account for one case each.

Voter education campaigns. In the context of the second round of the general local elections of October 20 (November 3), 2019, the Promo-LEX Association continued the Campaign for voter information, electoral education and apolitical mobilization of the citizens of the Republic of Moldova entitled to vote "I chose to vote for ...". It informed about 6,000 young people about the procedures and the importance of informed and conscious voting; four debates have been planned; the second promotional video spot has been launched.

The CEC and CICDE continued the voter information and education campaign "I choose to vote! Indifference does NOT bring changes" with two video spots broadcast both online and on TV.

INTRODUCTION

Report no. 6 has been developed within the framework of the Promo-LEX Observation Mission (OM) of the general local elections of 20 October (3 November) 2019. The report includes information on the organization of elections and electoral campaign for the second round of local elections to be held on November 3, 2019 in 383 level I constituencies and one level II constituency. Financing of electoral campaigns has been monitored during the period of 21-25 October 2019. The content of this document may be subject to editorial review.

The mission of the report is to diagnose in real time the quality of the procedures for organizing and conducting elections in a predetermined period of time; raising the level of responsibility of electoral actors; identifying positive and negative trends in electoral processes. The final report of the OM will be presented on December 13, 2019.

The Promo-LEX election observation methodology has been developed in line with the international standards in the field and involves both long-term (electoral period) 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.

The observation of the electoral process will be carried out during the electoral period by 41 LTOs. All the observers involved in the monitoring process are trained in the seminars organized by the Promo-LEX Mission and sign the Code of Conduct¹ 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 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.

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

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

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 mission is financially supported by the United States Agency for International Development (USAID) through the "Democracy, Transparency and Accountability" Program and co-financed by the Soros-Moldova Foundation through the project "Consolidating a Platform for the Development of Human Rights Activism and Education in the Republic of Moldova", focused exclusively on monitoring hate speech.

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

Promo-LEX OM emphasizes two legal issues which, according to the Mission, continue to affect the organization of general local elections, including the second round: first, the Electoral Code does not contain general or special rules regarding the conduct of the second round of local elections, except for the CEC's responsibility to ensure the conduct of the second round and the conditions for the conduct of the second round; second, we find that the special rule by which the right to vote in local elections is conditioned by the voter's domicile, and not by his/her residence, is not applied by the electoral bodies.

1.1. Lack of legal norms with regard to the organization and conduct of the second round of elections

We emphasize that the Electoral Code does not contain general or special rules regarding the conduct of the second round of local elections, except for the CEC's responsibility to ensure the second ballot (art. 26, para. (1), let. o) of the Electoral Code) and the conditions for the conduct of the second round, established by art. 145, para. (2) of the Electoral Code².

We should point out, in the same regard, that the general rules establishing the principles of participation in elections do not foresee the possibility of conducting the second round of elections, for example: *art. 4 - the right to a single vote in any ballot; art. 8 - conduct of the elections in a single day, art. 10 - voting for a single electoral competitor in a ballot.* The Promo-LEX OM also pointed out in the new local elections of 2018 that the Electoral Code does not explicitly regulate the period and the manner, in which the electoral campaign for the second round of elections is to be carried out, as well as its financing³.

The lack of legal rules regarding the conduct of the second round and the application by analogy of the rules governing the conduct of elections in a single round or those of the first round determines a differentiated and casuistic interpretation of legal norms. *Thus, we conclude that a clear regulation of the organization and conduct of the second round of elections is imperative, especially with regard to the competent body and the terms for establishing the date of the second round of voting, the start of electoral campaign for the second round and the rules related to the financing of electoral campaign (blocking / unblocking of "Electoral Fund" account), the procedure and the terms for counting the ballots after the first round, the procedure and the terms for contesting the results of the first round in case the second round is organized.*

1.2. Uncertainties regarding the place of citizens' voting

The general rule stipulates in art. 9 that the **right to vote is exercised in the settlement of the voter's domicile**, except for the cases provided by the Electoral Code. At the same time, if the voter has both the domicile and the residence, during the validity of the residence visa, he/ she shall vote in the settlement where he/she resides.

At the same time, the special rule applicable to local elections (art. 134, para. (2) of the Electoral Code) stipulates that when electing the local councils and mayors, **voters who do not domicile** in the respective administrative-territorial unit **do not participate in the voting**. Thus, we find that the

² If no candidate receives more than half of the number of valid votes cast, the second round shall be held within two weeks, with two candidates having the highest number of votes in the first round.

³ Report no. 5. Observation Mission for the new local elections of May 20, 2018 (June 3, 2018), p .9-10. See: <https://bit.ly/31XCcRs>

legislator links the right to vote in the local elections to the voter's domicile, that is to the permanent place of residence, according to the notion from art. 1 of the Electoral Code. It naturally follows that the persons who reside, but are not domiciled in the respective administrative- territorial unit, do not participate in the local elections in the given ATU.

Moreover, the verb "domicile" is used *in its strict sense*, its meaning being "have the domicile". In support of this assertion, we mention that in the text of the Electoral Code (art. 1: the notion "voters' list"; art. 44, para. (1)) uses the construction "citizens with voting rights who **domicile or reside** within the precinct of a polling stations". Thus, we conclude that the right to vote in local elections is conditioned by the criterion of voter's domicile, which corresponds to international standards as well⁴.

Contrary to the *lex specialis* principle *derogated from the lex generalis*, the Promo-LEX OM notes that the special norm is not applied by electoral bodies, moreover, the CEC has developed the normative framework subordinated to the law contrary to the special norm from art. 134 of the Electoral Code⁵.

At the same time, we emphasize that the application of special rule involves: (1) adjusting the way of drawing up voters' lists, which would only contain voters residing within the precinct of the polling station; (2) voting and, respectively, voters' inclusion/ non-inclusion on the supplementary lists. We mention that both art. 139 and art. 142 of the Electoral Code provide **for the proper application** of general rules regarding the drawing up of subscription lists and the voting process.

Thus, we consider that the CEC had to develop norms that would regulate procedures specific to the local elections in strict accordance with the provisions of the Electoral Code.

⁴ Code of Good Practice in Electoral Matters, the principle of "Universal Suffrage", p. 15. See: <https://bit.ly/34kavnz>

⁵ Regulation on the preparation, administration, dissemination and updating of voters' lists, points 13, 33, 36 d), h); Instruction regarding the particularities of exercising the right to vote in local elections, points 5, 9.

II. ELECTORAL BODIES

To ensure the organization of the second round of general local elections, the CEC approved decisions on the organization and conduct of the ballot. The accreditation of national (62) and international (5) observers continued. It is difficult to analyze the appeals / notifications submitted to the CEC because since October 3, 2019, the Commission has not published on its webpage any of the submitted appeals or decisions issued with regard to them. The Promo-LEX OM draws the readers' attention to three decisions that, in the Mission's view, contain problematic regulations: granting the right to vote at one's place, based on the requests submitted in the first round; the competent authority, the term and the manner in which the day of the second round of elections is established; approving the conduct of opinion polls.

Promo-LEX observers visited all 18 DECs, finding that all of them were open at the time of the visit. Of the 201 ECs I visited during the working hours, 39 (19%) were closed, and 162 (81%) were open. Compared to ECs I and DECs, the number of PEBs that respects the working program is lower: of the 342 PEBs visited, 106 (31%) were closed and 236 (69%) open.

The Promo-LEX OM emphasizes the existence of cases of delays in examining the requests for re-counting and the re-counting of ballots itself, which may affect the smooth conduct of the second round of the general local elections.

In this period, the CEC presented the results of the new parliamentary elections of October 20, 2019, and the Constitutional Court confirmed the results and validated the mandates of the newly-elected MPs.

2.1. Activity of the CEC

2.1.1. CEC decisions: a general overview

To ensure the organization of the second round of the general local elections of November 3, 2019, the CEC adopted seven decisions regarding the procedures for organizing the second round of elections⁶; five decisions regarding the appeals/ notifications submitted by competitors. At the same time, the CEC approved four decisions to modify the composition of several DECs⁷ and four decisions on the accreditation of national and international observers.

2.1.2. Accreditation of observers

According to the information published by the CEC⁸, observers accredited for the monitoring of general local elections of October 20, 2019 are entitled to continue their activity during the second round of elections, announced for November 3 this year. At the same time, other observers can be accredited, the deadline for submitting applications for accreditation for the second round of the general local elections of November 3, 2019 expires on October 26, 2019.

Accreditation of national observers. During the reference period, the CEC accredited for the second round of general local elections seven persons nominated by ADEPT Association for Participatory Democracy and 55 persons from MIRAD Public Association.

⁶ Approval of the staff and extension of the term of dismissal from the permanent place of employment of the members of lower electoral bodies; approval of the competitors' financial reports; approval of the date of the second round of elections, etc.

⁷ DEC no. 6 Briceni, no. 8 Cantemir, no. 16 Edinet and no. 34 Telenesti.

⁸ <https://bit.ly/2Pt5iFK>

Accreditation of international observers. The CEC accredited three persons from the European Network of Election Monitoring Organizations (ENEMO) and two persons from Pro-Democracy Club Association, Targu-Neamț.

2.1.3. Problematic aspects identified in the decisions approved by the CEC

A. Modification of the Instruction regarding the peculiarities of exercising the right to vote in local elections

During the monitoring period, the Commission undertook several measures to ensure proper organization of the second round of local general elections. Thus, on 28.10.2019, the CEC approved the Decision no. 2841 for amending and supplementing the Instruction regarding the peculiarities of exercising the right to vote in local elections⁹. Although the instruction contained two rules on voting in the second round, it was supplemented with two other provisions, which establish the ***place of voting for citizens who changed their domicile / residence in the period between the first and second round of local elections and granting the right to vote at the voter's place based on the request submitted in the first round.*** In this regard, we mention that the modification of the instruction five days after the approval of the Decision no. 2836 regarding the date of the second round of elections reduces the predictability and transparency of electoral process.

According to point 9, let. b) and c) of the Instruction, the right to vote in the second round will be exercised under the conditions similar to those of the first round, the following peculiarities being respected: "b) voters whose residence visa has expired in the period between the first and second round of general local elections will be able to vote at the polling station, which falls under the territorial area of their domicile, if in the respective constituency the second round of general local elections is organized; c) voters who, during the period between the first and the second round of general local elections, have changed their domicile / residence will be able to vote, based on the same voters' lists, at the polling stations in the precinct of their domicile / residence existing on the date the first round of elections".

Thus, we find two similar situations with different effects:

- 1) the expiry of the residence visa, which is a change of domicile / residence, results in voting at the place of domicile, that is to say, voting at another PS, not the one used in the first round;
- 2) the change of domicile / residence results in voting according to the registration of the domicile / residence visa as of the date of the first round of elections.

We believe that these regulations could generate uncertainties and disorientate both voters and PEB members involved in the second round of voting. At the same time, we welcome the intention to prevent "artificial migration" of voters, occurring between the first and second round of elections, by introducing special rules. The Promo-LEX OM notes that it would have been more appropriate to introduce these norms when the voters' lists were drawn up. Even so, this activity, undertaken a week before the election day, is able to ensure the expected effect.

As for the second provision, introduced by the CEC Decision no. 2841, we believe that, even if at first sight the decision of electoral authority to omit the necessity of repeatedly submitting applications for voting at one's place seems to be beneficial and complies with the principle of continuity of the electoral process, its assessment is not univocal.

Thus, according to point 37 of the Code of Good Practice in Electoral Matters, *voters must always be able to vote at the polling station.* Further, point 40 states that the use of mobile ballot boxes is not recommended, as it is accompanied by a high risk of fraud. However, if used, some strict conditions

⁹ <https://bit.ly/2JwH1dV>

must be observed to prevent fraud. The provisions approved by the CEC may have the capability to affect the strictness of the conditions imposed. In addition, with reference to persons with special needs, we consider that the electoral authority must create conditions for an inclusive electoral process providing for voting in the PS, based on ensuring a proactive behavior, especially for the respective category of voters.

At the same time, the procedure, by which PEB members are to confirm the applications for the first round of elections raises uncertainties, since it is not described in any normative act. In order to standardize the practice to be applied, we recommend the CEC to develop at least one circular letter on the procedure for the confirmation by the PEB of the applications for voting at one's place in the first round of elections.

B. Establishing the date of the second round of mayoral elections

On October 23, 2019, the CEC approved the Decision no. 2837 regarding the date of the second round of elections of the general mayor of Chisinau and of the mayors in some municipal, city, village (communal) constituencies. By this decision, based on the data processed and the information of SIAS Elections System, the CEC established that the second round of elections will be held in 384 constituencies on November 3, 2019, and in case the information provided by SIAS Elections System and the **processing of final results** produced any changes, the CEC would make the corresponding adjustments in the list of respective constituencies.

At the same time, the CEC decided that voting in the second round of general local elections will be based on the same voters' lists used in the first round.

Unlike presidential elections, the electoral law does not provide for a general or a special rule for local elections regulating the competent authority, the terms and the way in which the second round of elections is established, nor the information that should be at the basis of this decision. Besides the fact that Decision no. 2837 admits the possibility of its modification due to the processing of the final results (uncertain period), we consider that the contestation of election results and re-counting of ballot papers could also lead to modifications in the decision to set the date of the second round in certain constituencies.

The Promo-LEX OM considers that these issues should be clarified, and the legislator should also determine the effects of the decision to establish the date of the second round in order to regulate the beginning of electoral campaign for the second round.

C. Approval of conducting exit polls after the voting

On October 29, 2019, the CEC approved a decision¹⁰ by which it took note of the prior notification of the conduct of an exit poll during the second round of general local elections. We mention that the request for conducting an exit poll was submitted by the Association for Equitable Development of Moldova, and the exercise is to be carried out in cooperation with POLIEXPERT Political Consulting Company which, in its turn, contracted two specialized companies: FOP-STAR, Company of Sociological Research and Marketing and IMAS INVENT, Institute of Marketing and Surveys.

Previously, FOP-STAR, LLC had submitted a request to conduct an exit-poll, which was rejected by the CEC on October 18, 2019¹¹, on the grounds that the exit poll is conducted in the building that accommodates the polling station or immediately at the exit from it. Additionally, one of the purposes of the exit poll is to verify the correctness of the voting process, of counting and totalizing the voting

¹⁰ <https://bit.ly/2qbA4rO>

¹¹ <https://bit.ly/2q1PCi6>

results, thus to a large extent, the activity of the survey operators can be compared with that of the observers in the elections. Consequently, the CEC concluded that the exit-poll would be carried out by the qualified public associations from the Republic of Moldova, and the survey operators would be registered by them.

We highlight that until June 2010, the provision of art. 64, para. (3) (the current article 70, para. (10)) of the Electoral Code was supplemented with the text: *"Qualified organizations that intend to organize exit polls will coordinate their activities with the Central Electoral Commission, which will develop general rules in the field"*. In addition to the fact that an important provision was excluded from the Electoral Code, we find that the legislator granted the right to conduct exit polls **to organizations qualified in carrying out sociological surveys**, and not to public associations, and the CEC was obliged to develop general rules in the field.

In the absence of a legal framework that would regulate the organization and conduct of this type of surveys and the status of survey operators, we consider it unfounded to impose on public associations the condition of carrying out exit-polls. Moreover, by the decision issued, the CEC took note of the prior notification (condition imposed for conducting the surveys), accredited the designated persons to carry out the exit poll and approved the legitimate model of the survey operator.

We note that the criterion regarding the prior notification was also fulfilled by Intelligent Data, LLC, which submitted the notification on August 23, 2019¹², which was denied on September 22¹³. We consider that the lack of a legal framework regarding the status of the survey operators is not imputable to the organizations that intend to conduct exit polls, it's rather the fault of the legislator and the superior electoral body.

2.2. Activity of the DEC

2.2.1. Compliance with the working hours

During the monitoring period, Promo-LEX observers visited 18 DEC, all of them being open at the time of the visit.

2.2.2. Modification of DEC composition

During the reference period, the process of modifying the composition of DEC continued, but at a smaller scale, four cases being registered. Thus, in the composition of the DEC no. 6 Briceni and no. 8 Cantemir, two members nominated by the courts were replaced, in DEC no. 16 Edinet - a member appointed by the PDM and in DEC no. 34 Telenesti - a member nominated by the PPS.

2.3. The activity of Level I Electoral Councils (EC I)

2.3.1. Compliance with the working hours

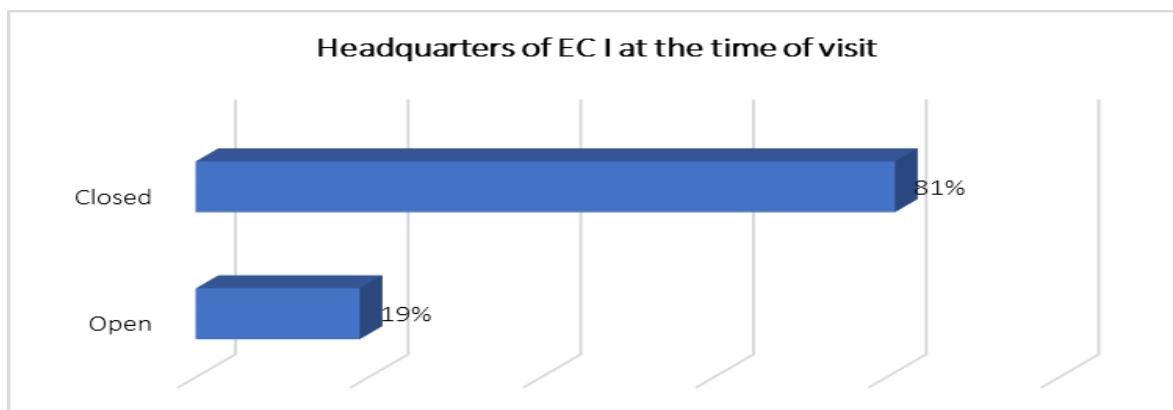
According to the CEC decision¹⁴, the second round of the general local elections will be held in 384 level I electoral councils. During the reporting period, Promo-LEX observers visited 201 (52%) ECs I during their working hours, and established that 39 (19%) were closed and 162 (81%) were open.

¹² <https://bit.ly/2JRpMV9>

¹³ <https://bit.ly/34nD5V7>

¹⁴ CEC Decision no. 2836 of 23.10.2019, amended by the CEC Decision no. 2837 of 23.10.2019. <https://bit.ly/349puR8>

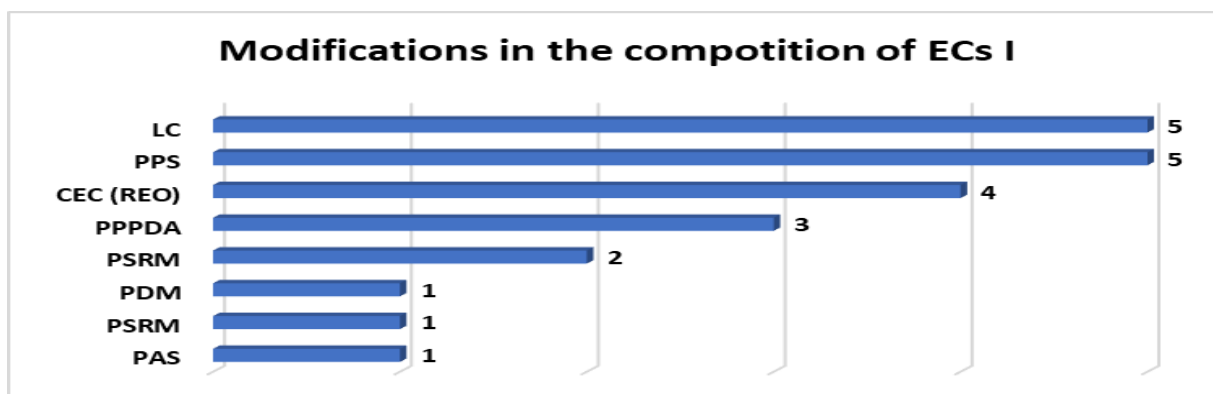
Chart no. 1



2.3.2. Modification of EC I composition

According to Promo-LEX reports, the composition of ECs I was changed in at least 22 cases, most of the members being replaced by local councils (see chart no. 2). As for the parties, we find that the PPS and the PPPDA submitted most requests to modify the composition of ECs I (5 and 4 respectively).

Chart no. 2



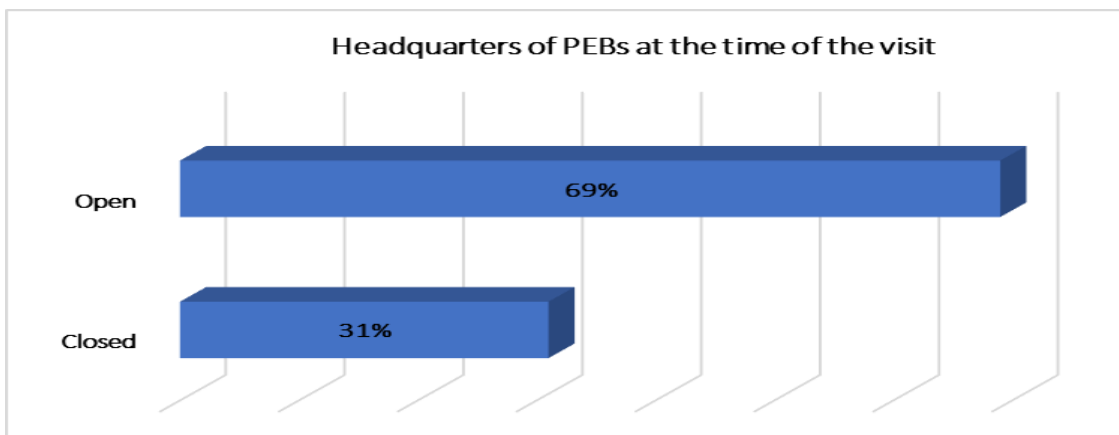
2.4. The activity of PEBs

2.4.1. Compliance with the working hours

In the reporting period, Promo-LEX observers visited 342 PEBs,¹⁵ monitoring the activity of their members during the electoral campaign for the second round of general local elections. We note that compared with ECs I and DECs, the number of electoral bodies that respect the working hours is lower: of the 342 PEBs visited, 106 (31%) were closed and 236 (69%) open (see chart no. 3).

¹⁵ The second round of the general local elections of November 3, 2019 will take place in 1027 PS, according to data processed by Promo-LEX observers.

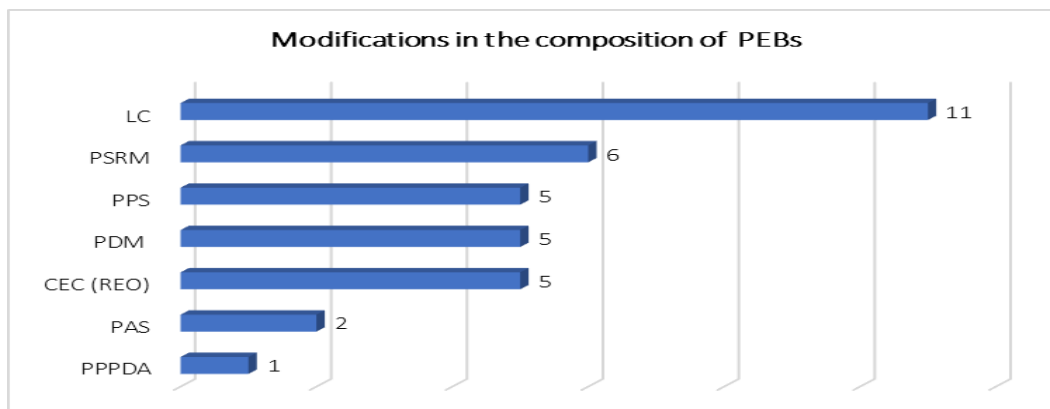
Chart no. 3



2.4.2. Modification of PEB composition

Of the 236 PSs open, at least 35 changes were made in the composition of 106 PEBs. Chart no. 4 shows that the PSRM, the PPS and the PDM are the political parties that submitted most requests to modify the composition of PEBs. With regard to entities with the right to appoint members in the composition of PEBs, members nominated by the local councils (LC) submitted most requests to withdraw from office.

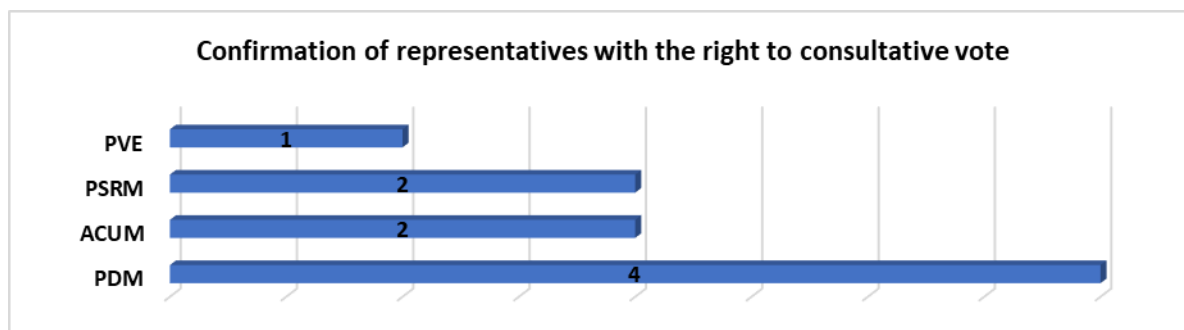
Chart no. 4



2.4.3. Confirmation of representatives with the right to consultative vote within PEBs

Electoral competitors may appoint to PEBs a representative with the right to consultative vote, which is confirmed by the bureau within three days from the date of submission of the application.

According to the information obtained from the PEBs open at the time of the visit (106), a total of at least 9 representatives with the right to consultative voter for the PDM, PSRM, ACUM and the PVE were confirmed during the reference period (see chart no. 5).



2.5. Confirmation of the legality of local elections of October 20, 2019 and validation of mandates

According to art. 146 of the Electoral Code, the ECs submit the reports with the results of the elections to the courts, and the courts, within 10 days from the date of receiving the protocols, confirm or deny the legality of the elections in each constituency by a decision and transmit it, within 24 hours after adoption, to the CEC and respective ECs, which shall publish the final results. Simultaneously with the confirmation of the legality of the elections, the corresponding courts validate the mandates of elected councilors and mayors.

According to Promo-LEX observers, until October 30, 2019, the legality of local elections had been confirmed in 258 constituencies, most of them being in the districts of Telenesti (30), Riscani (28), Cantemir (28) and Anenii Noi (26). It should be mentioned that in at least two cases, Promo-LEX observers had restricted access to electoral information. In one case, the police officer did not allow the observer to enter the building of the Court of Straseni, suggesting him to obtain the necessary information from the president of the DEC, and in the second, at the Riscani headquarters of the Court of Chisinau, the observer was informed that access to the requested information can only be obtained following a written request.

At the same time, following the elections of October 20, 2019, at least 39 requests for re-counting of ballots were filed with the courts, with at least five being accepted¹⁶. Fifteen applications were rejected or declared inadmissible and the courts would have to decide with regard to the remaining applications. At least three judgements of the first instance courts on re-counting or refusal to re-count the ballots were challenged to the Court of Appeal.

We emphasize the fact that, according to art. 66, para. (3) of Electoral Code, the re-counting takes place within a maximum of seven calendar days from the date of adoption of the decision on the re-counting of ballots, while in the case of these elections, three days before the second round, the courts had not yet ruled on the re-count requests. We consider that delaying the procedures for examining the applications and delaying the re-counting of ballots has a negative effect on the smooth conduct of the second round of the general local elections.

In addition, taking into account the large number of requests to re-count the ballots, we mention that, according to art. 66, para. (3) of the Electoral Code, re-count may be ordered for well-founded reasons that affect the results of voting and distribution of mandates. Thus, we emphasize that there are no legal norms that would elucidate the cases, in which the reasons for re-counting can be considered justified or not and there is no advisory opinion of the Supreme Court of Justice for the unification of

¹⁶ Trifauti, Soroca dist.; Ciuburciu, Stefan Voda dist.; Rascieti, Stefan Voda dist.; Calarasi.

judicial practice in this respect. Moreover, we note the lack of special rules regarding the procedure and the effects of re-counting of ballots in the first round of elections.

2.6. Appeals

2.6.1. Central Electoral Commission

Seven appeals were lodged with the Central Electoral Commission in the period of 21-30 October.

In the reference period, the CEC expressed its position by issuing decisions with regard to a notification and three appeals, all referring to the financing of electoral campaigns. The appeals were examined within 13, 15 and respectively, 19 days and the notification within 7 days from its submission. According to art. 71, para. (6) of the Electoral Code, the examination of the appeals regarding the financing of electoral campaigns of political parties is not subject to the limitation periods stipulated in art. 72-74.

However, the Promo-LEX OM notes that the CEC abuses of the exception to examine the appeals within the limitation periods set by the Electoral Code, as the Commission had to settle the disputes at least before the day of elections, if the circumstances to be elucidated did not require a very detailed examination.

Thus, in order to confirm the above, we present the following information resulting from the decisions of the CEC:

- 1) in the case of the notification, the parties submitted the referral four days before the date of its examination, and other materials, submitted later, were not examined. We mention that during this period, the CEC convened a meeting, which could have examined this notification;
- 2) in the case of appeal no. CEC-10ALG / 32, the parties submitted it 12 days before the date of its examination, and other materials, registered with a later date, were not examined. During this period, the CEC convened six meetings, in which this appeal could have been examined;
- 3) in the case of appeal no. CEC-10ALG / 29, the parties submitted it five days before the date of its examination, and other materials, registered with a later date, were not examined. During this period, the CEC convened two meetings, in which this appeal could have been examined;
- 4) in the case of appeal no. 17/03 of October 9, 2019, the date of submission is uncertain, but the materials submitted and examined allowed the Commission to conclude on the admissibility of the appeal within a short period from its submission.

In the judgments issued with regard to the appeals and the notification, the CEC decided to reject all the claims as unfounded. In addition, through one of the rejection decisions, the CEC decided to notify the Financial Inspectorate, subordinated to the Ministry of Finance¹⁷, and in another case, it warned an electoral competitor of the obligation to respect the legal framework precisely¹⁸. We reiterate that, in accordance with points 26 and 27 of the Regulation regarding the procedure for examining and settling the appeals during the electoral period, rejecting an appeal cannot have the effect of finding an infringement or compelling a party to take action.

*The Promo-LEX OM reiterates that, **contrary to the principle of transparency of electoral process**, the Central Electoral Commission **has not published** the filed appeals and the decisions issued on them, starting with October 3, 2019. We consider that this omission seriously affects the electoral process and the free observation of electoral disputes, reducing the level of voters' information.*

¹⁷ <https://bit.ly/2Wt5gyV>

¹⁸ <https://bit.ly/2PzHZKd>

2.6.2. District Electoral Councils (DECs)

According to Promo-LEX observers, **10 appeals** were filed with **the District Electoral Councils of level II** (DEC Chisinau - 3, DEC Cimislia - 1, DEC Soroca - 1, DEC Edinet - 1), with three rejection judgments and three decisions to return the appeals being issued during the reference period.

As for the complainants, candidates of political parties and of the electoral bloc filed eight appeals, independent candidates –two.

Two appeals were filed against ACUM Bloc regarding the conduct of electoral campaign activities and an electoral display, and eight appeals were filed against lower electoral bodies (PEBs - 6, ECs I - 2) targeting the procedures for counting and totalizing the ballots in the local elections of October 20, 2019, as well as the procedure for appointing representatives of electoral competitors to accompany the mobile ballot box.

2.6.3. Level I Electoral Councils (EC I)

According to Promo-LEX observers, five electoral competitors (2 – the PDM, 1 – ACUM Bloc, 1 – the PLDM, 1 - PPS) filed appeals with ECs I. Two complaints refer to the processes of ballot counting and totalizing the results of the local elections, two – to misuse of administrative resources, and one - to the incompatibility of the position of SIAS Elections operator with that of interim mayor and relation of kinship with an electoral competitor. Two of the three appeals were rejected by district electoral councils.

2.7. Tabulation of the new parliamentary elections results

In the meeting of October 25, 2019, the CEC totalized the results of the new parliamentary elections of October 20, 2019, held in the SMC no. 17, no. 33, no. 48 and no. 50. Based on tabulation protocols of the new parliamentary elections in the single member constituencies, the CEC assigned the mandates to the Parliament of the Republic of Moldova to the elected candidates: SMC no. 17 - Ghenadie Verdes (the PDM), SMC no. 33 - Vasile-Andrei Nastase (ACUM Bloc), SMC no. 48 - Vitalii Evtodiev (the PSRM), SMC no. 50 - Galina Sajin (ACUM Bloc).

The CEC submitted to the Constitutional Court the report on the results of the new parliamentary elections of October 20, 2019 requesting the validation of the mandates assigned to the newly-elected candidates. On October 31, 2019, the Constitutional Court examined in a public hearing the referral of the CEC on the the confirmation of the results of new parliamentary elections in the four SMCs and the validation of the mandates of the elected MPs. The Court ruled the following¹⁹:

- to confirm the results of the new parliamentary elections of October 20, 2019 in the single member constituencies: no. 17, Nisporeni; no. 33, Chisinau; no. 48, Slobozia, municipalities of Tiraspol and Bender, and no. 50, west of the Republic of Moldova;
- to validate the mandates of the members of the Parliament of the Republic of Moldova elected in the new parliamentary elections of October 20, 2019 in the above SMCs.

¹⁹ <http://bit.ly/2JFyG82>

III. VOTERS' LISTS

In the opinion of the Promo-LEX OM with reference to the general local elections of October 20, 2019, there are reasonable suspicions of artificial migration of voters. The analysis of official data on internal movement of citizens in the period of 19.08.2019 - 10.10.2019 revealed that contrary to the common practice specific to the majority of level I ATUs, in at least 29 settlements, there were at least three requests for residence registration, as well as requests for the registration of domicile.

Additionally, in at least one settlement, where the second round will be organized, observers have identified 7 different notifications from level II ATUs about people registering their residence on one and the same day.

3.1. Suspicions of artificial migration of voters based on official data (until 21.10.2019)

In the monitoring reports no. 1²⁰ and no. 4²¹, the Promo-LEX OM emphasized that the phenomenon of "artificial migration" of voters during the electoral period remains a legally unsettled issue, including in the context of the general local elections of October 20, 2019. We remind the reader that this phenomenon refers to the situation, in which voters change their residence on the eve of elections in an orderly manner.

To clarify the respective suspicions, on 15.10.2019, the Promo-LEX OM sent to the Public Services Agency (PSA) a letter requesting access to electoral information about the population fluctuations in the period of 19.08.2019 - 10.10.2019. On 21.10.2019, the PSA responded to the request.

For the present report, due to a large fluctuation, lack of a statistical basis for performing the comparison, as well as due to a relative balance between the citizens registered and expunged from the records of the municipalities of Chisinau, Balti, Comrat, and district centers, these ATUs were not analyzed to identify cases of artificial migration.

Respectively, the OM selected for investigation other 1623 settlements (including from the level I ATUs) covered by the response of the PSA, whose analysis of artificial migration is possible due to the lack of internal movement of the population on a regular basis. The conclusion of Promo-LEX OM is that the phenomenon of artificial migration was present in the general local elections of October 20, 2019. The number of registrations of residence (temporary) was used as a basic criterion, but the number of registrations of domicile (permanent place of residence) was also taken into account.

Thus, out of the total of 1623 settlements, at least in 1540 (95%), there was no registration of (temporary) residence during the period of 19.08.2019 - 10.10.2019, this being the general rule for the settlements of the Republic of Moldova, except for the district centers and the municipalities of Balti and Chisinau.

Exceptions to the general rule are 83 settlements, where at least one registration of residence was found, *respectively, suspicions of artificial migration may arise*. In Annex no. 1, we presented 29 selected

²⁰ Report no. 1. Promo-LEX Observation Mission for General Local Elections and New Parliamentary Elections of October 20, 2019, p. 15, 20. <http://bit.ly/2kpYRpL>

²¹ Report no. 4. Promo-LEX observation Mission for General Local Elections and New Parliamentary Elections of October 20, 2019, p. 40-41. <http://bit.ly/2pYTXT4>

ATUs in which there were at least three applications for registration of residence, as well as applications for registration of domicile. In particular, we emphasize the cases of: *Egoreni, Sorooca* (21 - residence, 4 - domicile); *Topala, Cimisia* (12 - residence, 7 - domicile); *Calimanesti, Nisporeni* (10 - residence, 1 - domicile); *Racovat, Sorooca* (9 - residence, 6 - domicile).

The Promo-LEX OM points out that at this stage, it is difficult to assess the possible impact of artificial migration on the election results, as well as other relevant aspects (the share of invalid votes, for example), because at the time of writing this report (31.10.2019) the CEC had not published yet on its website the protocols of totalizing the voting results in level I and II constituencies.

3.2. Suspicions of artificial migration of voters in the context of the second round of local elections

Promo-LEX observers reported at least one case when seven applications for registration of residence were received on one and the same day. It is the case of the village of Sadaclia, Basarabasca, where the observer identified seven letters of notification of persons living in other districts and who, on 25.10.2019, were registered (temporarily) in Sadaclia. We mention that the second round of local elections will be held in the village.

IV. ELECTORAL COMPETITORS

On November 3, 2019, the second round of mayoral elections will be organized in 384 constituencies. Most candidates competing in the second round have been nominated by the PSRM (179), the PDM (176) and ACUM Electoral Bloc (169). In terms of direct confrontation, in most constituencies, “the battle” will be held between candidates nominated by the PDM and the PSRM (63), followed by the PDM - ACUM Electoral Bloc (57), as well as the PSRM - ACUM Electoral Bloc (48).

The number of campaign activities in the second round of local elections decreased significantly, dropping to a total of 92, compared to 1014 activities held during the observation period before the first round of elections. The most active competitors in this regard have been ACUM Electoral Bloc (36%), the PSRM (33%) and the PDM (12%). Activities most frequently reported are placement of electoral posters and distribution of informative materials (49%), as well as conduct of electoral meetings (23%).

The Promo-LEX OM has identified at least four cases, involving PDM candidates, which can be qualified as offering of goods in electoral campaign (providing road repair services, distribution of foodstuffs, money and clothing).

The Mission reported four situations that can be described as misuse of administrative resources: three electoral meetings held in state institutions during working hours (1 – the PDM and 2 - ACUM); a case (ACUM), which can be described as use of public office in promoting an electoral competitor.

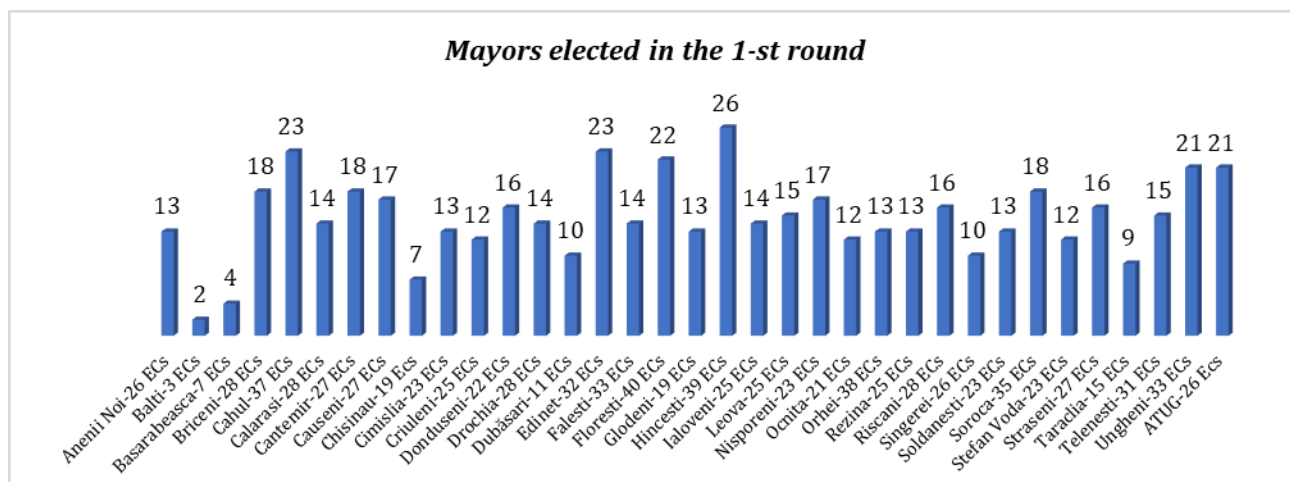
Other campaign activities that can be qualified as deviation from the legal norm refer to claiming merits for the projects implemented at public expense (3 cases – the PSRM); promoting candidates involving the image of personalities from abroad (3 - ACUM); use of electoral advertising in violation of legal provisions (15 cases).

3.3. Statistical data on electoral competition in the second round

3.3.1. Results of the first round of the general local elections (October 20, 2019)

General local elections of local councilors and 898 mayors in the settlements of the Republic of Moldova were held on October 20, 2019. As a result, 514 mayors were elected in the first round, of which 513 in the 1st level constituencies and a mayor (mun. Balti) of the second level constituency (see chart no. 6).

Chart no. 6



The districts with most mayors elected in the first round are: Dubasari (10 out of 11 ECs I), ATUG (21 out of 26 ECs I), Nisporeni (17 out of 23 ECs I), Donduseni (16 out of 22 ECs I) and Edinet (23 of 32 ECs I). At the opposite extreme, the districts with the fewest mayors elected in the first round are: Orhei (13 out of 33 ECs I), municipality of Chisinau (6 ECs I out of 18 and one DEC), (10 out of 26 ECs I) and Falesti (14 out of 33 ECs I).

As for the entity that nominated the candidates elected to the positions of mayor, according to the data reflected in chart no. 7, most elected mayors were nominated by the PDM (190), the PSRM (122) and ACUM Electoral Bloc (82). Additionally, 63 elected mayors (12%) ran as independent candidates.

Chart no. 7

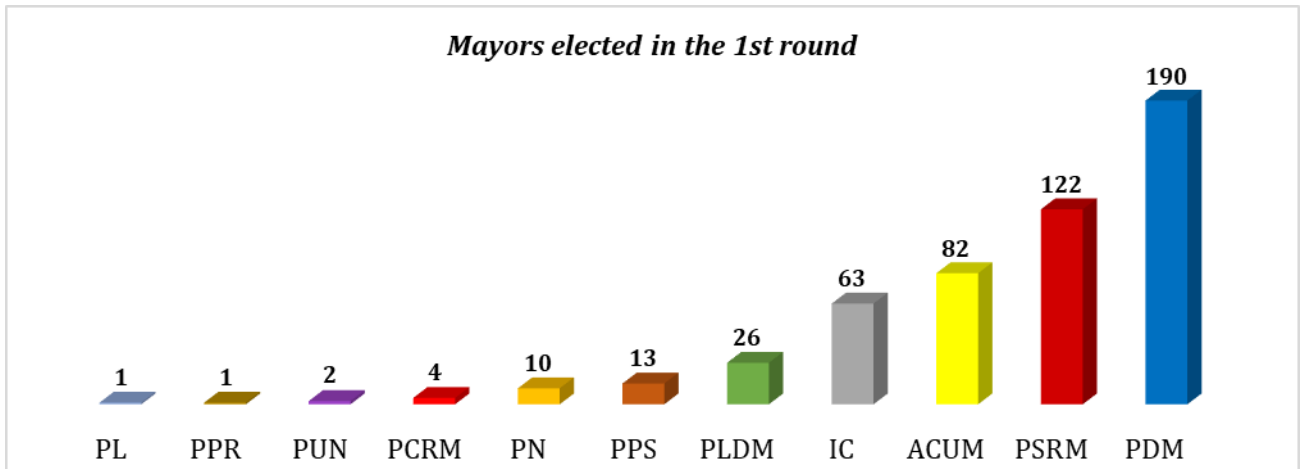
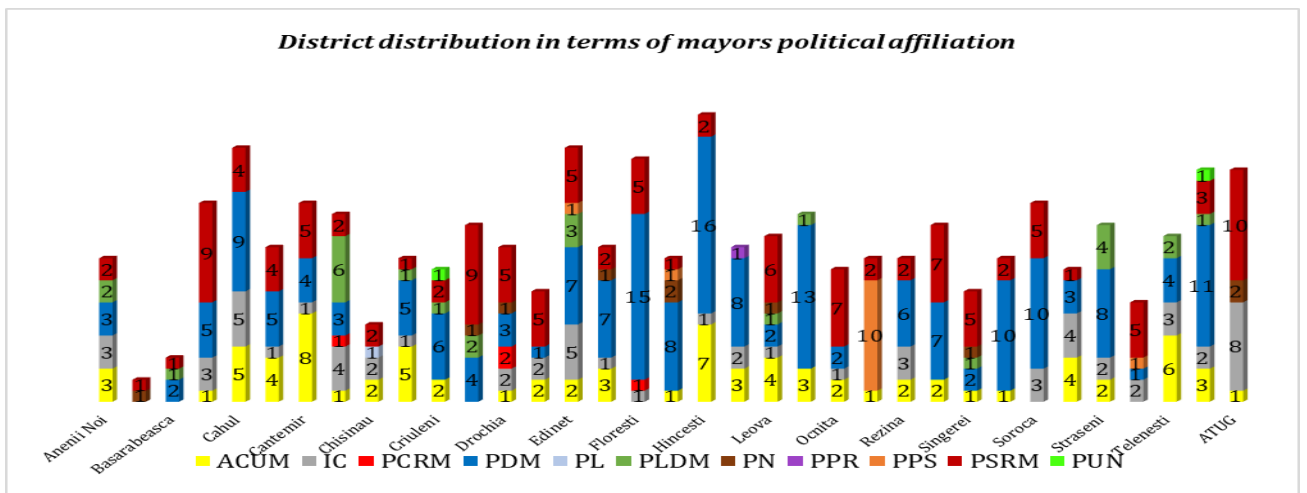


Chart no. 8 reflects the districts of the Republic of Moldova according to political affiliation of their elected mayors. Thus, we find that most mayors appointed by the PDM were elected in the districts of Hincesti (16), Floresti (15) and Nisporeni (13). Most of the mayors appointed by the PSRM were elected in ATUG (10), the districts of Briceni (9) and Donduseni (9). In the case of ACUM Electoral Bloc, the most elected mayors nominated by the bloc were in the districts of Cantemir (8), Hincesti (7) and Telenesti (6). In the Orhei district, the most elected mayors were nominated by the PPS (10).

Chart no. 8



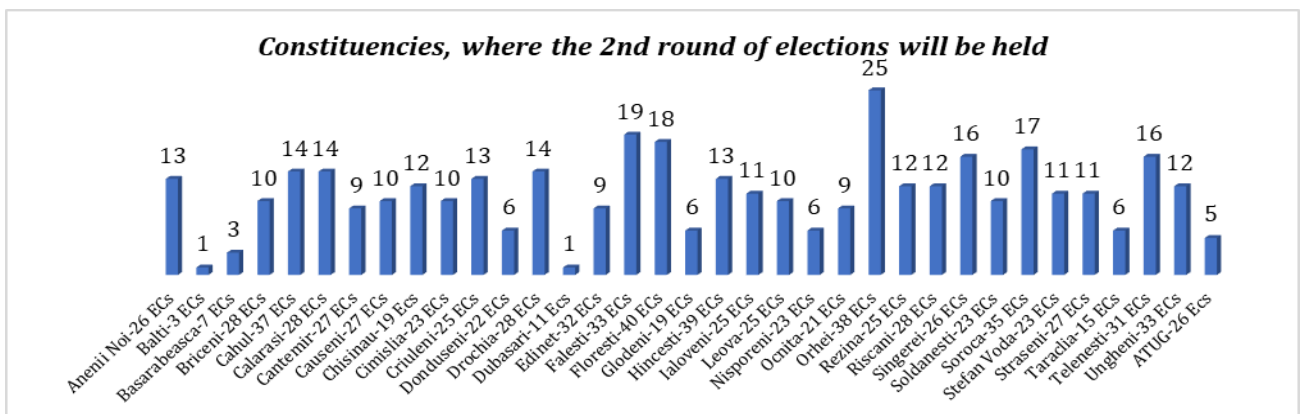
In terms of gender statistics, of 514 elected mayors, only 21.6% (111) are women and 78.4% (403) are men. Most of the women elected in the first round were nominated by the PLDM (23%), the PSRM (22%) and ACUM Bloc (22%). We also note that out of 63 independent candidates elected for the mayor's office in the first round, 18 (28.6%) are women.

3.3.2. Electoral competitors running in the second round

On November 3, 2019, the second round of mayoral elections will be held in 384 constituencies (1 - DEC, Chisinau and 383 - ECs I, respectively).

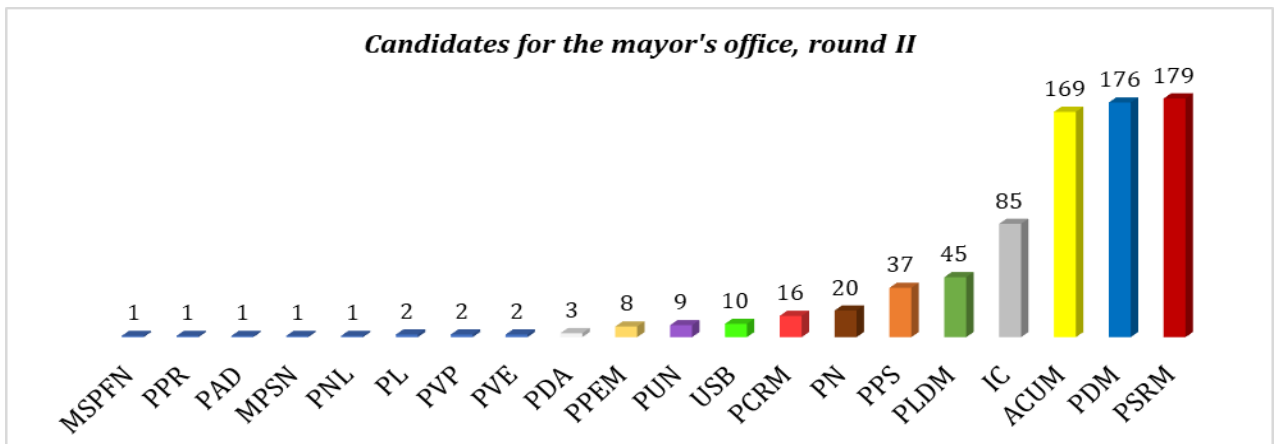
Chart no. 9 indicates constituencies, where the second round of elections will be held.

Chart no. 9



According to the chart no. 10, most candidates who will compete in the second round were nominated by the PSRM (179), the PDM (176) and ACUM Electoral Bloc (169).

Chart no. 10



In terms of direct confrontation, in most constituencies the candidates nominated by the PDM will compete with those from the PSRM (63), followed by the PDM v. ACUM Electoral Bloc (57), the PSRM - ACUM Electoral Bloc (48). Data on 384 ECs are reflected in Annex no. 2.

Of 768 candidates running the second round, only 176 (23%) are women. Of them, 157 were nominated by political parties and 19 are independent candidates. Therefore, we find that women remain underrepresented in local administration.

3.4. Electoral campaign activities

According to Promo-LEX observers, at least 92 electoral campaign activities were organized during the reference period, most of them by ACUM Electoral Bloc (36%), the PSRM (33%) and the PDM (12%).

Table no. 1. Election campaign activities

No.	Campaign activities	PSRM	ACUM	PN	PDM	PPŞ	PUN	PLDM	PCRM	PL	PPEM	IC	Total
1	Placement of electoral displays	7	8		3	1		3	1	1			24
2	Distribution of informative materials	13	3	2	2						2	1	23
3	Meetings with voters	2	17	2	1								22
4	Electoral debates	4	4		1							2	11
5	Press conferences	2	1				1			1			5
6	Door to door activities	2	2										4
7	Gifts				4								4
8	Sanitation events	2											2
9	Automobile march			1									1
Total		32	35	5	11	1	1	3	1	2	2	3	96

The most used types of activities were placement of electoral displays (25%), distribution of informative materials (24%), electoral meetings (23%). Geographically, campaign activities were carried out mainly in the municipality of Chisinau (40%), districts of Rezina (12%), Cahul and Soroca (6% each).

3.5. Street / promotional / online advertising to promote candidates

Observers of the Promo-LEX OM identified at least 180 situations proving the existence of electoral advertising, of which in 48% of cases the PSRM was involved, 23% - ACUM Electoral Bloc, 10% - the PDM. The most used advertising tools were print materials (newspapers, magazines, leaflets, posters) - 40%, banners - 22% and billboards - 9%.

Table no. 2. Types of advertising

No.	Types of advertising	PSRM	ACUM	PN	PDM	PPŞ	PUN	PLDM	PCRM	PL	PPEM	PVE	IC	Total
1	Leaflets, posters, flyers	18	18	1	5	1		3	1	1	2		1	51
2	Road banners / rollups	6	6	1	8	3	1	2				1	10	38
3	Newspapers, magazines, brochures	11	3	2	1									17
4	Billboards	4		6	2								3	15
5	Visibility materials	10	1	2										13
6	Sponsored advertising	7	5										1	13
7	Tents	13	2											15
8	Video spots	6	4										1	11
9	Online banners	3			1									4
10	Mobile / LED panels	2												2
11	Written press / online / TV	1												1
Total		81	39	12	17	4	1	5	1	1	2	1	16	180

3.6. Activities that can be qualified as offering of goods during the electoral period

During the observation period, the OM identified at least four cases targeting the PDM that can be qualified as offering of goods during the electoral campaign, as follows:

- on October 26, 2019, it was reported that in the village of Bogdanovca Noua, Cimislia dist., the PDM candidate for the mayor of Cimislia, Mihail Olarescu, organized the repair of a street in the village, leveling it with gravel. To this end, he brought a bulldozer, a vehicle used for leveling and digging of roads and trucks with gravel. The activity was actively promoted on social networks;
- on October 26, 2019, the PDM candidate for the mayor of Gordinesti, Rezina dist., Olesea Borcan, organized a social event for the elderly, offering snacks, drinks (champagne, rolls and apples) and at least 10 rugs;
- on October 28, 2019, a truck with potatoes was noticed in front of the Causeni town hall. It was approached by pensioners who had been in the town hall and had vouchers for social bread on them. The pensioners received 5 kg of potatoes presenting the vouchers. They said that they would receive 5 kg of potatoes in case of voting for the PDM candidate Grigore Repesciuc, being required to provide personal data (name, surname, year of birth, address);
- on October 28, 2019, the discussion with community members revealed that in the village of Ialpujeni, Cimislia dist., the wife of the PD candidate for the position of mayor, Eremia Pascaneanu, offered to the locals in the churchyard robes and money (50 and 100 lei) as alms in the context of a religious holiday, asking them to vote for her husband.

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

In the observation period, there were reported at least four situations that can be regarded as misuse of administrative resources. Thus, Promo-LEX observers found that electoral competitors organized **three electoral meetings in state institutions during working hours** (1 – the PDM and 2 - ACUM), as follows:

- electoral meeting of the PDM candidate with school employees from the village of Alexandru Ioan Cuza, Cahul (24.10.2019);
- electoral meeting of ACUM Electoral Bloc with the employees of Orizont Theoretical Lyceum, Chisinau (24.10.2019);
- electoral meeting of ACUM Electoral Bloc with the employees of the Vocational School no. 6, Chisinau (24.10.2019).

Also, the OM registered **a case** that can be qualified as **use of public office in promoting an electoral competitor**. Thus, in a video spot promoting the candidate of ACUM Electoral Bloc to the position of mayor of Chisinau, Maia Sandu mentioned: *The position of prime minister is temporary, I will always remain a citizen of Chisinau (...) Vote for Andrei Nastase!*

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

Similar to the previous reports, we find that electoral candidates continue to claim merits for activities performed at public expense. In the reference period, at least three cases of this kind were registered (all involving the PSRM):

- on 25.10.2019, PSRM office in Budesti posted the following message on its page on social networks: *With the contribution of Mr. Ion Ceban and projects carried out by his team in the Chisinau Municipal Council, today, after several decades, Budesti has a modern fitness room installed in the Budesti Theoretical Lyceum;*

- on 22.10.2019, an article was published on the official page of the PSRM²² mentioning: *By the end of October, another 10 playgrounds will be installed due to the PSRM program;*

- on 21.10.2019, on the official page of the PSRM²³, an article was published stating: *Chisinau has another playground thanks to the Socialist Party in the Chisinau Municipal Council.*

3.9. Cases that can be qualified as promotion of candidates using the image of personalities from abroad

According to art. 52, para. (3) of the Electoral Code, it is forbidden to involve in any form of electoral campaigning persons that are not citizens of the Republic of Moldova, and according to para. (8), the image of foreign officials cannot be used for campaigning purposes.

Contrary to these provisions, in the observation period, the Mission identified at least three cases, in all of them ACUM Bloc was involved, when the image of foreign personalities was used to promote the candidates:

- in the electoral debates of 24.10.2019²⁴, the candidate of ACUM Bloc, Andrei Nastase, made reference to the image of Emil Boc, mayor of Cluj-Napoca, Romania;

- on October 22, the candidate of ACUM Bloc for the position of mayor of municipality of Chisinau posted on social networks and distributed the message claiming the support of Nicolae Robu, mayor of Timisoara, Romania;

- on October 30, 2019, in a TV show, the candidate of ACUM Bloc for the position of general mayor of municipality of Chisinau, Andrei Nastase, referred to the support he has from PNL representatives in the Romanian local public administrations, who have signed a *Declaration to support the efforts aimed at the implementation of European principles in local administrations in the Republic of Moldova*²⁵.

In addition, Promo-LEX observers reported a case, when images of a person, who is not a citizen of the Republic of Moldova (mayor in Romania), but supports the candidacy of Andrei Nastase, appeared in the media space. It was the image of mayor of the municipality of Oradea and president of PNL in Bihor, Ilie Bolojan, who posted on social media a message in support of Andrei Nastase²⁶. However, in this situation, the Mission cannot determine to what extent the competitor involved in the electoral campaign the person mentioned above.

In this context, the Promo-LEX OM reiterates its position that the legislator should review the content of the respective prohibitions, so as to make them more explicit and necessarily take into account the general framework governing the freedom of expression. If the prohibitions are inappropriate and practically unenforceable, the legislator may consider repealing them.

3.10. Cases that can be qualified as use of electoral advertising in violation of legal provisions

According to the reports made by Promo-LEX observers, *there have been at least three cases of using electoral advertising in violation of the requirements for advertising materials and at least 15 cases of placement of advertising in unauthorized places.*

²² <https://bit.ly/2WpwmXM>

²³ <https://bit.ly/2Pxommi>

²⁴ <https://bit.ly/32ZDgpl>

²⁵ <https://bit.ly/2N2YIJX>

²⁶ <https://bit.ly/2Wp9YOC>

Thus, according to art. 70, para. (6) of the Electoral Code, the responsibility for the content of electoral advertising, broadcast or published, is borne by electoral competitors. Each advertising material must include the name of the electoral competitor, the date of printing, the circulation and the name of the printing house that printed it. Paid electoral advertising will appear under the "Electoral" heading.

However, contrary to these provisions, Promo-LEX observers reported at least three cases of distribution of electoral materials in the absence of information on the date of printing, circulation and name of the printing house. Of these, in two cases, the PDM candidates (Cimislia and Micauti, Straseni dist.) are targeted, and in one case – the PN (Burlaceni, Cahul).

In accordance with the provisions of point 14 of the *Regulation on the placement of electoral advertising and political promotion on displays*,²⁷ it is forbidden to place electoral posters in places other than those established by law.

Contrary to the above provisions, Promo-LEX observers found at least 15 cases of placement of electoral advertising in unauthorized places - on fences, poles, buildings, etc. The advertising materials belong to the following competitors: the PSRM (5), ACUM Bloc (4), the PLDM (3), the PPS (2) and the PDM (1).

3.11. Situations that can be qualified as acts of violence in electoral campaign

According to Promo-LEX observers, there was at least one case that can be described as an act of violence. Thus, on October 29, the electoral headquarters of ACUM candidate for the position of mayor of the town of Bolduresti, Vasile Portevschi, was vandalized (the window was broken and the fence was shattered).

²⁷ CEC Decision no. 3328 of 28.04.2015. <https://bit.ly/2W2zkky>

IV. FINANCING OF ELECTORAL CAMPAIGNS

Sixteen electoral competitors submitted reports to the CEC for the period of 21 - 25 October 2019. Only 6 competitors reported revenues of 190,589 lei. They account for financial donations of 3 natural persons in the amount of 11,720 lei in favor of 3 competitors (the USB, MPSN, PAD); own means - transfers from the current account of three political parties to the electoral fund account (the PDM, PPS, ACUM) in the amount of 178,869 lei. At the same time, 14 competitors reported remaining resources in the initial balance, reaching a total of 2,238,991 lei. Of 16 competitors that submitted reports, 10 reported expenses of 1,255,069 lei, declaring a final balance of 1,174,504 lei. The major share of declared expenses accounts for advertising - 1,139,554 lei (71%); promotional materials - 408,321 lei (26%); transportation - 38,550 lei (2%); other expenses - 17,849 lei (1%).

Following the civic monitoring activity, the Promo-LEX OM found that 4 electoral competitors (the PSRM, ACUM, PDM, Victor Sau (I.C)) failed to fully reflect expenses incurred in the period between 21- 25 October, 2019. The total estimated unreported amount is of at least 20,063 lei.

4.1. Unblocking of the "Electoral Fund" account

The Promo-LEX OM notes that on October 23, 2019, 16 electoral competitors (the PSRM, the PPS, ACUM Bloc, the PCRM, the PLDM, the PDM, the PUN, the PVP, the PN, the USB, the PVE, the PL, the MPSN, the PPEM, the PNL, the PAD) who are running in the second round of the general local elections, unblocked their "Electoral Fund" accounts and started collecting revenues and spending for the second round election campaign.

4.2. Financial reporting of electoral competitors

Regarding financial reporting, 16 electoral competitors submitted to the CEC their weekly reports on the financing of electoral campaigns for the period of 23-25 October 2019 ((the PSRM, the PPS, ACUM Bloc, the PCRM, the PLDM, the PDM, the PUN, the PVP, the PN, the USB, the PVE, the PL, the MPSN, the PPEM, the PNL, the PAD). According to the findings of the Promo-LEX OM, the CEC published the reports submitted on October 25, 2019.

4.3. Revenues and expenses of electoral competitors reflected in weekly reports

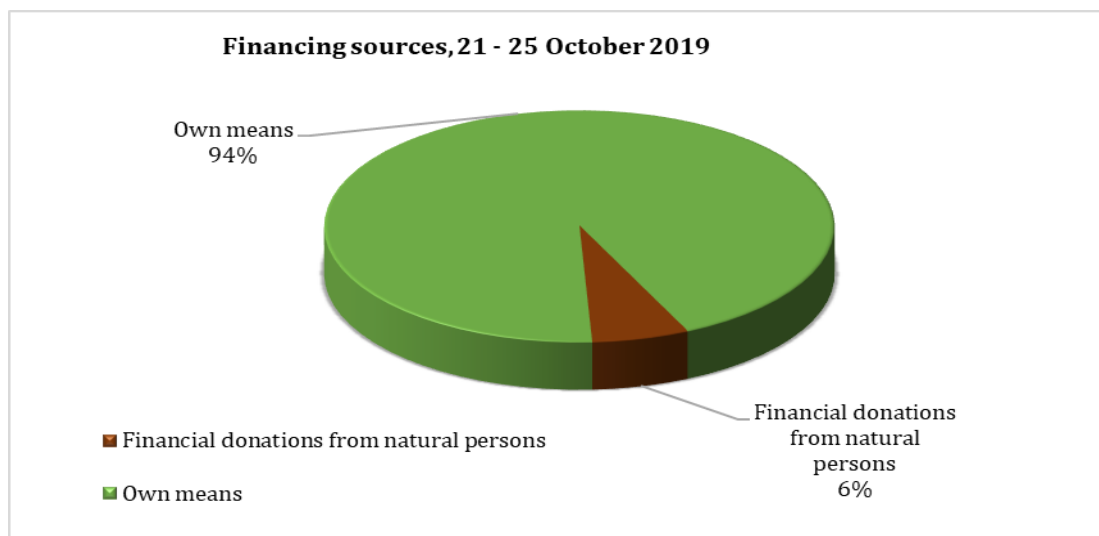
According to the reports for the period of 23- 25 October, 2019, only six electoral competitors reported revenues, the declared amount reached 190,589 lei, 14 competitors reported remaining financial means of 2,238,991 lei on the initial balance; 10 competitors reported expenses of 1,255,069 lei, with a final balance of 1,174,504 lei.

4.3.1. Funding sources declared in weekly reports

The financing sources of the electoral competitors are as follows:

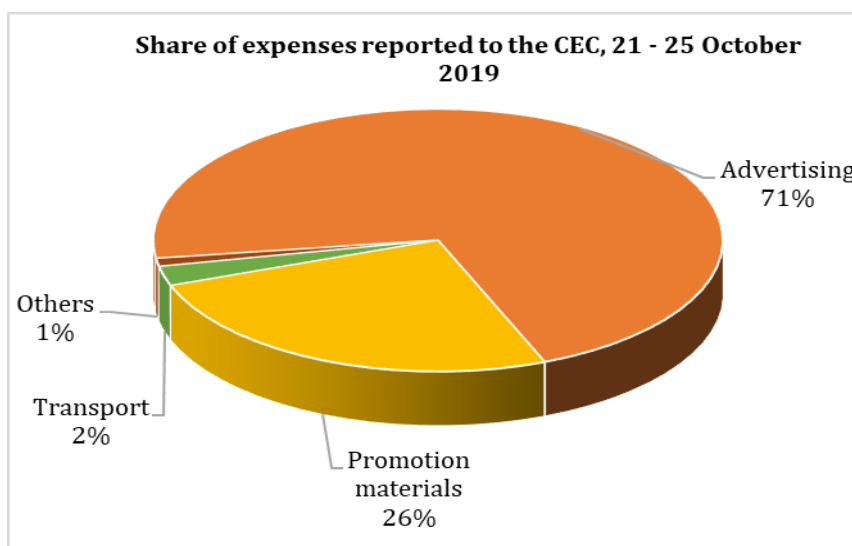
- financial donations from three natural persons, worth 11,720 lei in favor of three competitors (the USB, the MPSN, the PAD);
- own means - transfers from the current party account of three political parties to the "Electoral Fund" account (the PDM, the PPS, ACUM) in the amount of 178,869 lei (see chart no. 11).

Chart no. 11



According to the financial reports, the major share of the expenses falls for advertising - 1,139,554 lei (71%); promotional materials - 408,321 lei (26%); transportation - 38,550 lei (2%); other expenses - 17,849 lei (1%) (see chart no. 12).

Chart no. 12



Expenses of electoral competitors incurred in the second round of elections found by Promo-LEX observers and not reflected in financial reports

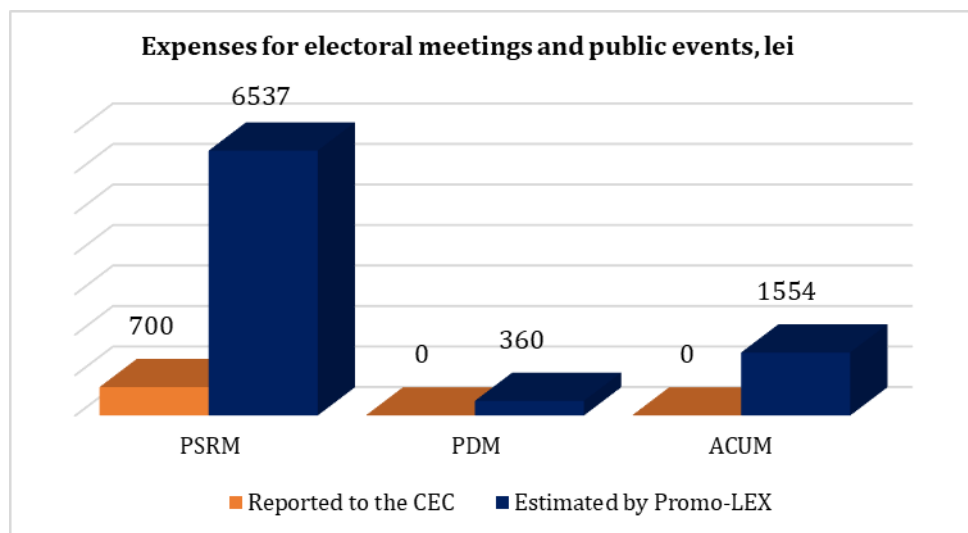
a) Expenses for electoral meetings and events

During the observation period, three electoral competitors organized 13 electoral meetings, 3 press conferences and 3 sanitation actions. One competitor (the PSRM) reported expenses that are lower than the Promo-LEX estimates, and the other two (ACUM and the PDM) reported 0 expenses. The total estimated amount reaches 7,751 lei (see chart no. 13).

According to the observers, the PSRM organized at least 8 electoral meetings, 2 "door-to-door" activities, 2 press conferences and 3 sanitation actions; ACUM held 4 electoral meetings and 1 press

conference; PDM - 1 electoral meeting. The total expenses for the events carried out are estimated at 8,451 lei.

Chart no. 13



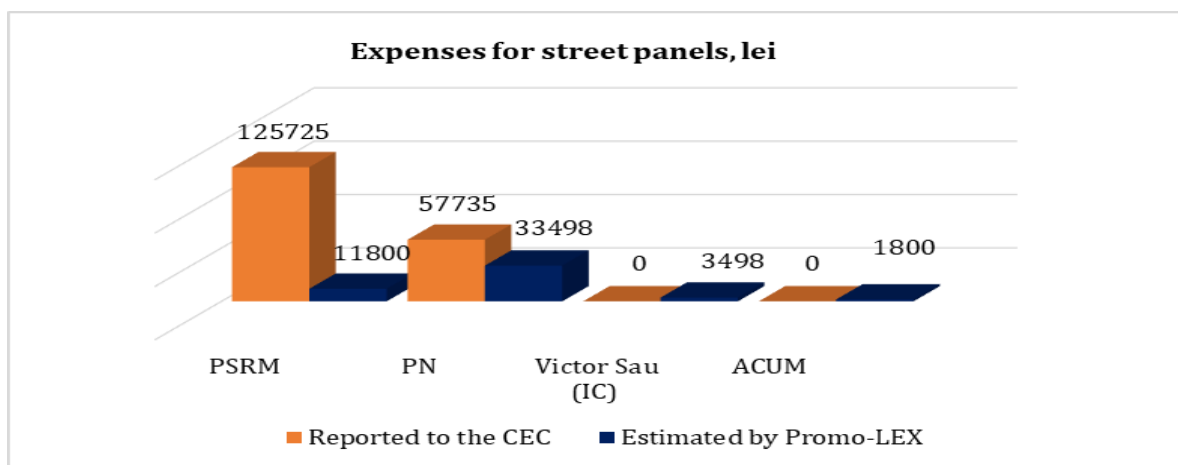
b) Advertising expenses

Expenses for street and mobile advertising

According to the findings of the Promo-LEX OM, at least four competitors (the PSRM, the PN, ACUM, Victor Sau (IC)) incurred expenses for street panels, of which two did not report any expenses in this respect. Promo-LEX notes that the two competitors failed to report at least 5,289 lei (see chart no. 14).

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

Chart no. 14

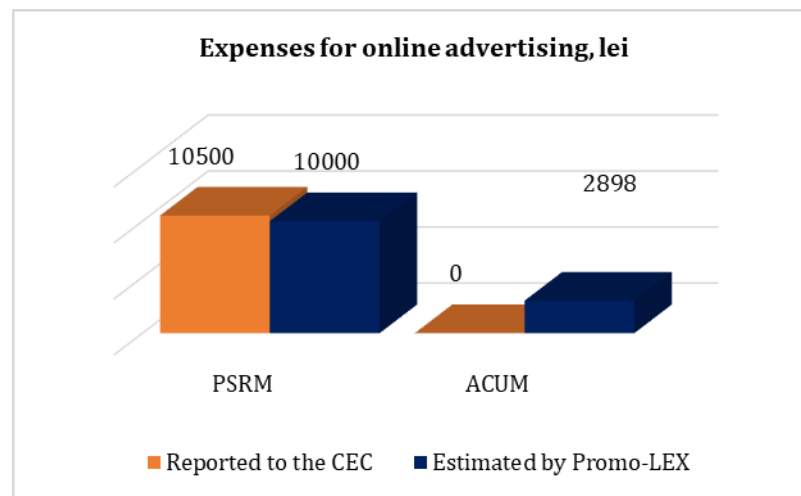


Expenses for online advertising

By October 25, 2019, the Promo-LEX OM found that two electoral competitors (the PSRM and ACUM) had electoral online advertising - sponsored pages on Facebook, online banners on several portals. Expenses estimated to be unreported amount to at least 2,898 lei.

The calculation formula used to estimate the cost of sponsored posts on Facebook provided for the multiplication of a sponsored publication by the price of 6 euros (117 lei) and the number of days when the post was seen. To estimate the cost of online banners, the number of online advertising houses that own the platforms mentioned below was multiplied by the price of 3,500 euros per month (68,007 lei) (see chart no. 15).

Chart no. 15

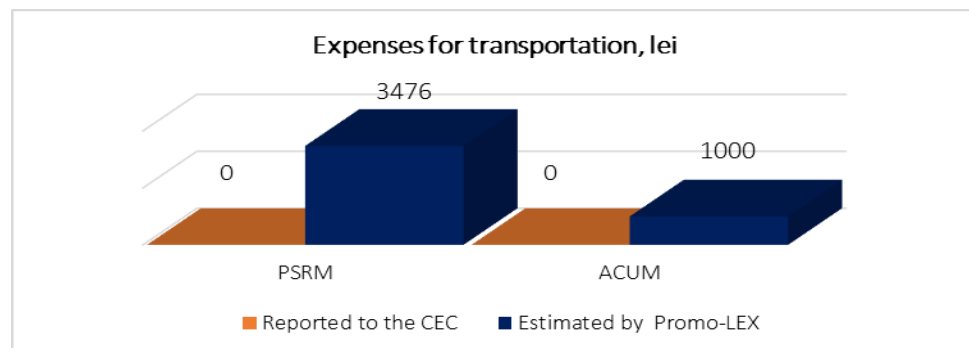


c) Expenses for transportation of people and goods

Promo-LEX observers found that at least two competitors used cars on the territory of the Republic of Moldova for electoral purposes, but no electoral competitors reported transportation costs to the CEC. According to our estimates, competitors failed to report at least 4,476 lei.

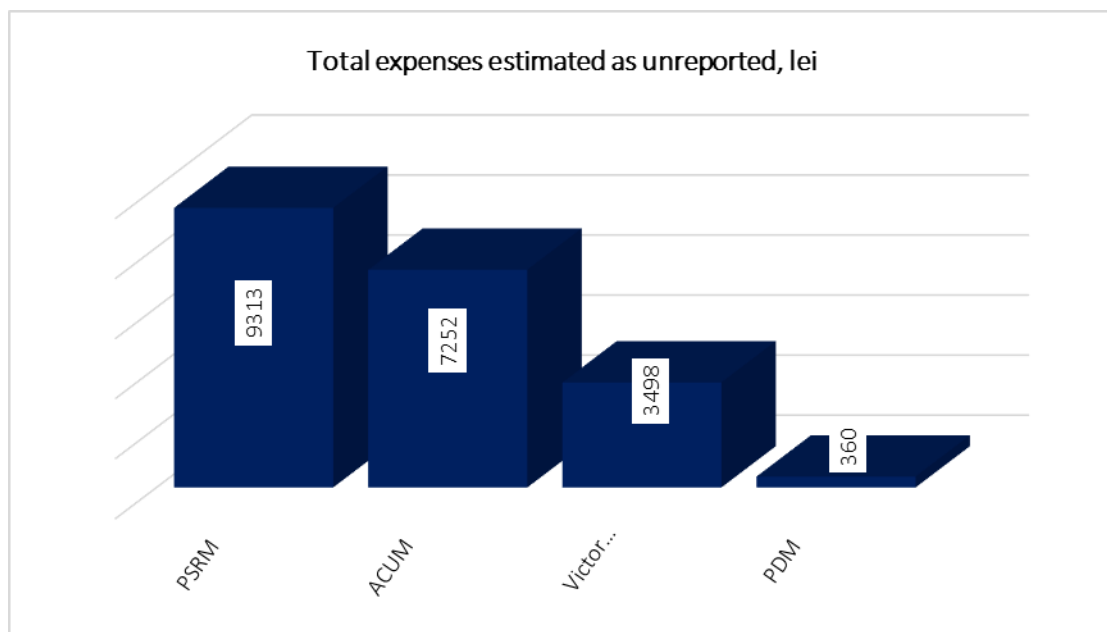
The calculation formula used to verify the estimates provided for the multiplication of an average consumption of 9 l / 100 km (car), 10 l / 100 km (minibus), 35 l / 100 km (bus) by the distance traveled and the fuel price of 18.78 lei (see chart no. 16).

Chart no. 16



The Promo-LEX OM notes that four electoral competitors (the PSRM, ACUM, the PDM, Victor Sau (IC)) have omitted to fully reflect the expenses incurred between 21- 25 October 2019. The total amount of unreported expenses is of at least 20,063 lei (see chart no. 17).

Chart no. 17



V. HATE SPEECH

According to the information reported by the observers, the OM found at least five cases in which electoral competitors generated discriminatory messages or displayed other forms of intolerance in the public space, of which: the PN has been involved in three situations, and ACUM Bloc in two situations.

On the other hand, the OM identified at least three cases, where competitors were targeted by hate speech - two cases referring to the PSRM candidate - Ion Ceban and a case, targeting the candidate of ACUM Bloc - Andrei Nastase.

Cumulating the criteria underlying hate speech cases, we note that five of them are based on prejudices against mentally challenged people, four cases involve denigration and dehumanization, which are based on political affiliation of electoral candidates, intolerance to LGBT people and prejudices for religious beliefs account for one case each.

5.1. Candidates who resorted to hate speech and incitement to discrimination

During the monitoring period, the OM registered at least five situations, where candidates resorted to hate speech or incitement to discrimination, thus perpetuating intolerance based on discrimination, denigration and other stereotypes and prejudices in public space.

1. In his public appearances, Renato Usatii made several statements about his political opponents, in most cases targeting the PSRM representatives:

a) 18.10.2019 – livestream on his Facebook page (translated from Russian):

“Yesterday, when they (the PSRM) tried, at the expense of several people, well, one being a schizophrenic, the second - his boss ...”

"A laminated leaflet, it mentions the author, the only thing that it doesn't mention is Costujeni (psychoneurologic dispensary), second floor, the room next to the WC, Tsyrdia. There is no signature."

“I won't call you people (address to the PSRM), I'll say, you can't be called even monkeys, which you describe. The whole country knows how I called you before. Yes, Plahotniuc, having no permission from me, called you turkey cocks (...). But the country will find out what kind of animals you are ... ”

“In short, scammers, crooks, liars and just gays (about the PSRM).”

“We won't allow any violence against Balti, if necessary, we, together with the residents of Balti, can rape you, but we definitely don't need such relations, it's normal for you, we still are of a normal orientation in Balti, not the one you are used to in your party, so please stop your stories ... ”

"You've seen reports that I am not any more involved in money laundering, raider attacks, murder, as claimed by Tsyrdia, who belongs in Costiujeni ,..".

b) 21.10.2019 - press conference:

“I just have a shirt, a gift for Tsyrdia, bought specially from the hospital in Costujeni. When the residents of Balti will find this propagandist, they will treat him as he deserves ...”

c) 25.10.2019 - the program "Пятница с Анатолием Голя" (Friday with Anatolie Godea), broadcast by the RTR Moldova:

“This story was launched today again, unfortunately, by the socialists. ACUM Bloc did not do this, they said that Usatii returned to Moldova, Plahotniuc returned him. They are crazy...”

In most of the cases identified, Renato Usatii tries to denigrate and ridicule his political opponents, either by associating them with people with mental disabilities, with the Costiujeni Psychoneurologic Dispensary, or by alluding to the need to put a restraint jacket on them. Such expressions, although addressed to electoral competitors, affect, at the same time, persons with disabilities, perpetuating prejudices and thus, increasing the degree of intolerance in the society.

2. During the monitoring period, Andrei Nastase had at least two public appearances, in which he used prejudices and intolerance towards certain groups of people.

a) 25.10.2019 - livestream on his Facebook page:

"I'll tell you what a friend of mine from Oradea told me and not only me, but the whole world. Ilie Bolojan said, if someone tells you that today's Oradea, Romania's jewelry, would have been what it is today, without European money, tell him he's crazy. (...)

I say, the one who tells you that the city of Chisinau can be developed without money from outside, tell him that he's crazy or tell him that he is lying. "

Although Andrei Nastase's message does not refer directly to people with mental disabilities, the use of the word "crazy" makes a direct association with this vulnerable group in a negative context, thus perpetuating preconceived ideas about the respective social group.

b) 28.10.2019 - broadcast "Спецвыпуск" (Special Issue), NTV Moldova:

In a discussion about the crucifix inaugurated at the Ministry of Internal Affairs and the criticisms raised by it, Andrei Nastase stated:

"The Satanists have always criticized, those who confess a different faith did not criticize me, I was criticized by those who don't know whether they have any faith at all".

The statement calls on the religious beliefs in the society. Andrei Nastase suggests that he was not criticized by the people of faith (religious) for establishing the crucifix, but by the Satanists and the people without faith, that is, the atheists. The association between Satanists and atheists starts from prejudices towards the latter, often associated by religious persons with sin, evil and the devil.

Atheistic beliefs are protected by international standards on freedom of thought, conscience and religion. Thus, the statement instigates intolerance on grounds of confession and shared beliefs, thus perpetuating preconceived ideas against atheists.

5.2. Candidates targeted in messages that incite hatred or discrimination

During the monitoring period, the Mission registered at least three situations, in which electoral competitors and representatives of political parties involved in the general local elections were targeted in public discourses that incite discrimination, dehumanize, denigrate and appeal to stereotypes and prejudices.

1. On 17.10.2019, the civic activist Anatol Matasaru posted on his Facebook page an image, referring to the two electoral competitors, running in the second round of the general local elections in Chisinau.

The image shows a fight between two pigs and is accompanied by the comment: "A. Nastase & I. Ceban. Make the right choice! Don't make mistakes."

The message is a degrading one, dehumanizing politicians by associating them with animals.

2. On 18.10.2019, in a livestream on her Facebook page, the representative of Our Party (PN) Elena Gritco made several derogatory statements about the PSRM:

"Do not react to these morons, I have no other word for them."

"You act like stray animals, stray dogs" (about the PSRM representatives).

"If you give your vote to these scums (about the PSRM) (...) all of them are scums, starting from the top and to the least significant socialist, believe me, there really will be nothing to do in this country."

"We mustn't make this gross mistake, because such freaks as the Party of Socialists have no moral right to exit and lead our cities (...) or the country, as a whole."

"You need to behave differently with fools, and we are all smart people and we know how to deal with such animals as the Party of Socialists"

May the Lord protect us from such morons as the Party of Socialists."

The statements of the PN deputy president about their political opponents are derogatory and humiliating, inciting hostility and intolerance towards them. In addition to the degrading expressions, the quoted statements contain numerous elements of dehumanization and comparison with animals. In her speech, Elena Gritco also associates her political opponents with people with mental disabilities, thus perpetuating prejudices and the negative image of this vulnerable group in the society.

3. On 26.10.2019, a post containing a denigrating appeal against the PSRM candidate Ion Ceban was published in the Facebook group "Friends who like JurnalTV.md":

"Don't be a SHEEP. Don't vote for CIOBAN" (shepherd in translation).

The message is addressed to the voters, trying to intimidate them by comparing them with a "sheep". It is based on intolerance to the political affiliation of the candidate Ion Ceban and his voters. In just a few days, the message gathered over 800 likes and over 1,100 shares.

VI. VOTER EDUCATION CAMPAIGNS

In the context of the second round of the general local elections of October 20 (November 3), 2019, the Promo-LEX Association continued the Campaign for voter information, electoral education and apolitical mobilization of the citizens of the Republic of Moldova entitled to vote "I chose to vote for ...". It informed about 6,000 young people about the procedures and the importance of informed and conscious voting; four debates have been planned; the second promotional video spot has been launched.

The CEC and CICDE continued the voter information and education campaign "I choose to vote! Indifference does NOT bring changes" with two video spots broadcast both online and on TV.

6.1. Information activities carried out by Promo-LEX

In the context of the second round of the general local elections of October 20 (November 3), 2019, the Promo-LEX Association continued the "**Vote for...**" campaign for voter information, electoral education and apolitical mobilization of the citizens of the Republic of Moldova holding the right to vote. The overall objective of the campaign is to increase the degree of citizens' participation in the second round of general local elections.

The following activities aiming at the second round of elections have been performed:

- In the period of 23 October - 1 November, 2019, "door-to-door" information activities were carried out in 43 settlements (cities and villages), involving 34 teams, consisting of 34 local campaign coordinators and 170 volunteers. In total, about 6,000 young people were informed about the election day, voting procedures and the importance of an informed and conscious vote.
- In the period of 29 -31 October, 2019, Promo-LEX, in partnership with the public radio station Radio Moldova, organized three electoral debates with candidates for the position of mayor of Chisinau. An electoral debate is planned for November 1, 2019 on Moldova 1 public TV station.
- On October 23, 2019, Promo-LEX launched the second video spot for promoting conscious voting and apolitical mobilization of voters²⁸, which was promoted on social networks and on seven national and regional TV channels.

6.2. Activities of the CEC and CICDE

Voter education campaigns. In the reporting period, the CEC and CICDE continued the electoral information and voter education campaign "I choose to vote! Indifference does NOT bring changes" with two video spots²⁹, which urge voters to participate in the second round of general local elections of November 3, 2019, broadcast both online and on TV.

Trainings. PEB officials who will participate in the second round of general local elections can access the CICDE e-learning platform to study online the course for PEB members³⁰.

²⁸ <http://bit.ly/2MXwsmy>

²⁹ Video spots: <https://bit.ly/2MZy27v> and <https://bit.ly/2q58SeE>

³⁰ Page: <http://e-learning.cicde.md> . Course for PEB members: <https://bit.ly/34diFOY>

RECOMMENDATIONS

To the Parliament of the Republic of Moldova

1. Modification of the Electoral Code, by supplementing it with provisions regulating the conditions for organizing and conducting the second round of local elections, namely: *the competent body and the terms for establishing the date of the second round of elections; the start date of electoral campaign for the second round and the rules related to the financing of electoral campaign (blocking / unblocking of the "Electoral Fund" account); the procedure and the deadlines for recounting of ballots after the first round; the procedure and the deadlines for contesting the results of the first round in case of the second round; the voting conditions for persons who changed their domicile / residence during the period between the first round and second round and of those who submitted applications for voting at one's place.*
2. Explicit legal regulation of the procedures for organizing and conducting exit-poll surveys, respectively, of the status of survey operators.

To the Central Electoral Commission and lower electoral bodies

3. Applying to the local elections the special rule, by which the right to vote in local elections is conditioned by the criterion of voter's domicile, and not by that of residence.
4. Ensuring equal opportunities and avoiding double standards in the context of examining requests for conducting exit polls.

Abbreviations

ACUM Bloc – “ACUM: DA and PAS Platform” Electoral Bloc
art. – article
ATU - administrative-territorial unit
ATUG - Autonomous Territorial Unit of Gagauzia
CEC - Central Electoral Commission
CICDE – Center for Continuous Electoral Training
CMC - Chisinau Municipal Council
DEC – District Electoral Council of level II
DEU – Delegation of European Union in the Republic of Moldova
Dist. – district
EC I – electoral council of level I
FB- final balance
IB- initial balance
IC - independent candidate
let. – letter
LC – Local council
LPA - local public administration
LTO - long-term observer
MPA – Antimafia Popular Movement, Political Party
MSPFN - "New Force" Social-Political Movement, Political Party
mun. - municipality
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
PPEM - European People's Party of Moldova, 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
PSRM - Party of Socialists of the Republic of Moldova
PUN - The Party of National Unity
REO - Registry of Electoral Officials
SMC – Single Member Constituency
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

ANNEXES

Annex no. 1. List of ATU I with citizens entitled to vote registering residence between 19.08.2019 - 10.10.2019³¹

No.	Settlement	Number of citizens who were registered in the respective settlement during the period: 19.08.2019 - 10.10.2019	
		Domicile	Temporary residence
1.	Floreni, Anenii Noi	14	5
2.	Varnita, Anenii Noi	6	5
3.	Iordanovca, Bessarabasca	6	3
4.	Topala, Cimislia	7	12
5.	Dereneu, Calarasi	7	6
6.	Ciucur-Mingir, Cimislia	4	4
7.	Sagaidac, Cimislia	6	5
8.	Valea Perjei, Cimislia	9	5
9.	Ialpujeni, Cimislia	0	5
10.	Hrusova, Criuleni	9	3
11.	Cocieri, Dubasari	8	4
12.	Sanatauca, Floresti	5	3
13.	Calimanesti, Nisporeni	1	10
14.	Ciutesti, Nisporeni	4	6
15.	Pohorniceni, Orhei	0	8
16.	Podgoreni, Orhei	10	3
17.	Seliste, Orhei	7	5
18.	Cogalniceni, Rezina	3	5
19.	Badiceni, Soroca	8	4
20.	Cremenciug, Soroca	0	3
21.	Egoreni, Soroca	4	21
22.	Holosnita, Soroca	7	4
23.	Racovaț, Soroca	6	9
24.	Schineni, Soroca	1	4
25.	Zastanca, Soroca	5	3
26.	Trifauti, Soroca	6	3
27.	Codrul Nou, Telenesti	0	7
28.	Negureni, Telenesti	3	4
29.	Dezghingea, ATUG	7	3

³¹ The list includes settlements that registered the residence of three and more voters as well as voters' domicile.

Annex no. 2. Political affiliation of the candidates running in the second round

Candidates	Total number of candidates
PDM - PSRM	63
PDM - ACUM	57
ACUM - PSRM	48
PSRM - IC	31
PDM - IC	16
ACUM - IC	16
PDM - PLDM	17
ACUM - PLDM	13
PSRM - PN	12
ACUM - PPS	10
PDM - PPS	10
PSRM - PCRM	9
PSRM - PLDM	8
PPS - IC	7
ACUM - USB	7
ACUM - PUN	5
ACUM - PPEM	5
PSRM - PPS	5

Candidates	Total number of candidates
PDM - PUN	3
IC - IC	3
PLDM - IC	3
PDM - PN	3
PDM - USB	2
PDM - PCRM	2
PDM - PDA	2
PLDM - PN	2
ACUM - PCRM	2
PN - IC	2
PDM - PL	1
PDA - IC	1
PNL - IC	1
PPEM - IC	1
ACUM - PN	1
ACUM - MSPFN	1
ACUM - PAD	1
ACUM - PL	1

Candidates	Total number of candidates
ACUM - PPR	1
ACUM - PVE	1
PCRM - PPS	1
PCRM - PUN	1
PCRM - IC	1
PLDM - MSPFN	1
PLDM - PPS	1
PPS - PPEM	1
PPS - PVE	1
PPS - PVP	1
PSRM - PVP	1
PSRM - USB	1
PSRM - PPEM	1