



# **REPORT no. 6**

## **Promo-LEX Observation Mission for early Parliamentary Elections of 11 July 2021**

Observation period: Election Day, 11 July 2021

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*The responsibility for the views expressed in this report lies with the Promo-LEX Association and does not necessarily reflect the position of the donors. If there are any discrepancies between the text in Romanian language and its translation into another language, the Romanian version of the report will prevail.*

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## EXECUTIVE SUMMARY

### **General findings on the organization and conduct of the early parliamentary elections.**

Generally, on Election Day, the process of voting was efficiently organized in the polling stations subjected to monitoring. At the same time, the process of shooting the electoral operations lacked continuity at times, and the SIAS Elections System was sporadically dysfunctional. Observers reported several individual cases of electoral campaigning.

Suspicious with regard to offering of rewards and organized transportation of voters appeared in particular in the context of the citizens of the Transnistrian region and their turnout. Vote secrecy was affected by an increased incidence of photographing. The observation process was marked by isolated cases of intimidation of Promo-LEX observers by some election officials. The counting of votes was generally quick and calm.

**Opening and closing of polling stations.** According to art. 55 of the Electoral Code, on Election Day, voting takes place from 07.00 to 21.00. All PSs monitored by observers were declared open. In one case, a delay of more than 15 minutes was reported. At the same time, the absolute majority of polling stations observed (98%) closed at 21.00.

Furthermore, at least 227 (28%) of the 802 PSs observed ignored the obligation to display the ballot paper to all participants in the counting process by a single member of the PEB.

Promo-LEX OM emphasizes the fact that, according to its findings, the voting procedures were carried out in compliance with the COVID-19 protection measures in 80% of the polling stations.

**Incidents found during the Election Day.** Following the final processing of the information reported by STOs, including those of mobile teams, 480 incidents have been analysed and published in press releases, which is 19 less than in the second round of the presidential elections. The Promo-LEX OM draws the reader's attention to at least 12 cases of obstruction of free observation process in the polling station or intimidation of observers.

We also emphasize the fact that there are rumours about voters being rewarded (17), which have been reported mainly from polling stations opened for voters of the Transnistrian region (10). In the same context, the Promo LEX OM also mentions the cases (29) of organized voter transportation, of which the absolute majority (28) again refers to the polling stations opened for voters of the Transnistrian region.

Quantitatively, the most frequently reported incidents - 100 cases - refer to photographing of ballot papers and other violations of vote secrecy. Additionally, presence of electoral materials within the polling station was reported in 57 cases, and the interrupted shooting in the polling stations was reported in 53 cases.

**Final results of the vote counting by the Promo-LEX OM.** By the publication of this Report, the Promo-LEX OM analysed the correctness of 2,140 vote counting protocols, which were possible to obtain from electoral bodies, out of a total of 2,150 drawn up in the early parliamentary elections. We identified 24 protocols containing 44 errors, identified based on verification formulas. In particular, we emphasize the large share (71% of the total number of protocols erroneously filled

out) of errors related to non-compliance with the  $h = g_1 + g_2 + g_n$  formula, which provides for the summation of competitors' votes. Thus, the sum of the votes for the competitors would not coincide with the total number of valid votes cast.

The number of erroneous protocols identified in the early parliamentary elections is comparable to the data of the 2020 presidential and 2019 local general elections.

On the Election Day, the Promo-LEX OM also carried out a parallel vote counting. The preliminary summation was based on the results of the protocols sent by SMS by the observers in the polling stations. And the final tabulation was made verifying the protocols obtained in paper or photographed format. The results of the parallel vote counting did not reveal any major differences between the final data presented by the CEC and the final data of Promo-LEX.

## INTRODUCTION

Report No. 6 has been developed as part of the Promo-LEX Observation Mission (OM) of the early Parliamentary Elections of 11 July 2021. The Report includes the main findings on the opening and closing of polling stations, the incidents reported on Election Day, as well as an analysis of the results of parallel vote counting carried out by the Promo-LEX OM.

The Report has been developed based on the findings of the short-term observers (STO) sent by SMS. On the Election Day, the Promo-LEX OM delegated short-term observers to 600 polling stations (PSS) selected on the basis of a sample established by a sociological company. In addition, a static observer was assigned to all 41 polling stations, where voters from the Transnistrian region exercised their right to vote. The electoral process in the polling stations in the immediate vicinity of the PSS set up for voters of the Transnistrian region, and the access routes to them, have been monitored by 80 mobile teams of observers. Additionally, 80 observers have been delegated to the polling stations opened abroad.

All Promo-LEX observers and monitors have been trained in the workshops organized by the Observation Mission. They signed and undertook to comply with the Code of Conduct<sup>1</sup> of the Promo-LEX independent national observer, committing to act in good faith and in non-partisan way. Promo-LEX observers have been trained on COVID-19 pandemic protection standards. The activity of the observers was coordinated by the central team of the Association.

The findings of the STOs reported on the basis of two types of forms: the form for periodic reporting and the form for reporting incidents have been used as the main source for the development of the report. The reporting was carried via SMS sent by observers and stored for processing on the web platform [www.data.promolex.md](http://www.data.promolex.md). The information gathered was analysed by the Central Team and presented in the form of press releases.

Additionally, the Promo-LEX Mission manages the public web platform [www.electorala.monitor.md](http://www.electorala.monitor.md) to store information on Election Day from the observers' reports (including in photo / video format, which does not contain personal data). Moreover, any citizen had the opportunity to upload to the platform their reports on the activities observed in the electoral context.

The OM of the early Parliamentary Elections of 11 July 2021 is a project of the Promo-LEX Association, carried out within the Civic Coalition for Free and Fair Elections. The Promo-LEX OM is not a political opponent of the contenders involved in the electoral process, it is not an investigative body and does not assume the express obligation to prove the observed findings. However, the observers' reports are accompanied, as far as possible, by photo and video evidence, other documents, which can only be made available to law enforcement bodies, on the basis of appropriate requests, and in no case shall this be provided to electoral contenders. Moreover, the violations, including the alleged ones, which are found in this report, must be regarded by the electoral authorities as notifications and are to be examined according to the competence, in the light of the provisions of Article 22 (1) (q) and Article 68 (5) of the Electoral Code.

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<sup>1</sup>[Code of conduct](#) of the Promo-LEX independent national observer.

The international standards referred to in this report are those developed by the UN, OSCE, the European Commission for Democracy through Law (Venice Commission), the European Union and the Council of Europe.

The Election Observation Mission for the early Parliamentary Elections of 11 July 2021 is conducted by Promo-LEX Association with the financial support of the United States Agency for International Development (USAID) through the 'Democracy, Transparency and Responsibility' Program, of the Council of Europe through 'Support for civic observation of the 2021 Early Parliamentary Elections in the polling stations set up abroad' Project, as well as of the Netherlands Embassy Office in Chisinau through 'Support for informing citizens and civic observation of the 2021 Early Parliamentary Elections in the polling stations set up for voters from the Transnistrian region'. 'Hate speech' component is supported by Justice and Human Rights Department of Soros Foundation Moldova through 'Strengthening a platform for the development of human rights activism and education in the Republic of Moldova - stage IV'.

The opinions expressed in the reports and press releases of the Promo-LEX OM belong to the authors and do not necessarily reflect the position of the donors.

# I. OPENING AND CLOSING OF POLLING STATIONS

## 1.1. Methodological statements

Promo-LEX observers monitored the procedures for opening of polling stations, as well as for closing and vote counting in 802 PSs (37% of the total of 2150 PSs). Of these, in 721 PSs by static observers delegated to polling stations both within the country and abroad, and in 81 PSs - by mobile team observers.

At the same time, during the Election Day, voting procedures were observed in a total of 1490 polling stations (69% of the total of 2150 PSs) including, through the involvement of 80 mobile teams. Methodologically, we emphasize that the number of findings per subject may be different depending on the number of validated SMS received by the central team<sup>2</sup>.

## 1.2. Opening of the PSs

All polling stations observed were declared open. According to observers, all the PSs were opened at exactly 7.00 am or with insignificant time deviations except for one PS.

*Table no. 1. Opening of polling stations (based on 802 PSs)*

Period of time	Between 6:50 - 6:59	At 7:00	Between 7:01 - 7:14	After 7.15
Number of PSs opened	80 (11%)	683 (84%)	38 (5%)	1

## 1.3. Compliance with COVID-19 protection measures and accessibility of the PS

According to the findings of the Promo-LEX OM, in 80% of the polling stations, the voting and counting procedures were carried out in compliance with the protection measures against COVID-19 infection. The accessibility of polling stations for people with locomotor needs remains a necessity for at least 46% of the polling stations observed.

*Table no. 2. Accessibility of the PSs*

Question	YES	NO	Total PSs
Was the triage (thermometry, assessment of health condition) of election officials, observers and other subjects involved in the electoral process carried out before the opening of the polling station?	726 (91%)	76 (9%)	802
Is the polling station arranged in such a way as to ensure compliance with the requirement of 1 (one) meter social distance between election officials?	737 (92%)	65 (8%)	802
Did the election officials allow into the PS a larger number of voters than the number of polling stations used?	232 (16%)	1258 (84%)	1490
According to your perception, were the voting and counting procedures carried out in compliance with the protection measures against COVID-19 infection (use of gloves, masks / face shields, ventilation of rooms, keeping physical distance)?	638 (80%)	164 (20%)	802
Is the polling station sufficiently lit for the conduct of electoral procedures?	798 (99%)	4 (1%)	802
Is the polling station accessible to people with locomotor difficulties?	813 (54%)	677 (46%)	1490

<sup>2</sup> The results of the observation on Election Day were transmitted by the short-term observers to the central team on the basis of text messages. Methodologically, each observer had two breaks of a maximum of one hour each.



#### 1.4. Closing of the PSs

Table no. 3. Procedures for the closing of the PSs and vote counting

Question	YES	NO	Total PSs
Was the polling station closed at 21.00?	706 (98%)	15 (2%)	721 <sup>3</sup>
Were special forms for vote counting results initially drawn up?	657 (82%)	145 (18%)	802
Only one member of the PEB displayed the ballots to all the participants in the vote counting procedure	575 (72%)	227 (28%)	802
Did the video camera shoot the entire process of unsealing the ballot boxes and counting the votes without interruption?	788 (98%)	14 (2%)	802

The absolute majority of polling stations observed (98%) closed at 21.00. At least 15 polling stations (2%) closed after 21.00, the delay being insignificant.

It should be mentioned that in the case of 227 out of 802 observed PSs (28%) the requirement of presenting the ballot papers to all participants in the counting process by one PEB member was not complied with. Considering that there was only one type of ballot papers, the counting procedure was not a complex one. Moreover, in 145 PSs (18%) the procedure for filling out the special form for vote counting results was violated.

Compared to the presidential elections of November 2020<sup>4</sup>, the Promo-LEX OM finds a slight (3-4%) decrease in the compliance with the legal norm.

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<sup>3</sup> Only statistics obtained on the basis of information transmitted by static STOs, without those from mobile teams, are considered.

[Report no.8](#)<sup>4</sup> of Promo-LEX OM on the Election of the President of the Republic of Moldova of 1 (15) November 2020. Election Day, second round, p.9.

## II. INCIDENTS OBSERVED DURING THE ELECTION DAY

### 2.1. Methodological statements

On Election Day, incidents were reported by the following categories of Promo-LEX observers:

- 600 static observers in the polling stations on the territory of the Republic of Moldova, in line with the sociologically established sample;
- observers of 80 Mobile Teams that operated in the country, including in the territorial administrative units where polling stations were opened for voters of the Transnistrian region;
- 41 static observers from the polling stations set up for the Transnistrian region;
- 80 static observers in polling stations opened abroad.

A total of 601 notifications were submitted, of which 480 were classified by the Central Team as incidents.

### 2.2. Summary of incidents

Table no. 4. Incidents on the Election Day

No.	INCIDENT CATEGORY	NUMBER		+/-
		Parliamentary elections	Presidential elections, round II	
1.	Restricted access, obstruction of free observation process in the polling station or intimidation of observers.	12	13	-1
2.	Ballot boxes were not sealed according to legal procedures / breaking / damage or absence of seals on ballot boxes	19	43	-24
3.	Unjustified presence of unauthorized persons inside the polling station or within 100 m of the PS	24	28	-4
4.	Presence of campaigning materials, displays, electoral panels in the polling station (within 100 meters of the PS)	57	9	+48
5.	Interruption of the shooting of the opening of the polling station or of the procedures for vote counting	53	24	+29
6.	Electoral campaigning or black PR within the perimeter of 100 m and / or inside the polling station to influence the choice of voters	29	19	+10
7.	Rumours, attempts or even situations of material or monetary rewards offered to voters within 100 m of the polling station to influence the choice of voters	17	22	-5
8.	Organized voter transportation (buses, minibuses or other units of transport that would not normally have anything to do around the PS)	29	37	-8
9.	Deficiencies in the operation of SIAS Elections System (suspension of operation; situations when the SIAS Elections System indicate that the voter has voted and he / she claims not to have voted)	28	61	-33
10.	Deficiencies in the electoral rolls	23	15	+8
11.	Photographing of ballot papers, other violations of vote secrecy (presentation of the ballot paper with the vote cast, incorrect location of the voting booths that allow viewing the voter's option, etc.)	100	108	-8
12.	Unjustified group voting (there are 2 or more people in the voting booths)	31	10	+21
13.	Unjustified cessation / suspension of voting in the polling station	12	7	+5

14.	Power outages	4	11	-7
15.	Problems in the process of closing of the PS and counting of votes	13	5	+8
16.	Ballot papers are not safely stored	4	0	+4
17.	Acts of violence or intimidation of voters, or other people in the PS	9	9	0
18.	Others	16	69	-53
	<b>TOTAL</b>	<b>480</b>	<b>499</b>	<b>-19</b>

Promo-LEX OM notes a slight decrease in the total number of incidents presented on the day of the parliamentary elections of July 11, 2021 (19 cases less) compared to the second round of the presidential elections of November 2020.

In the current elections, the Promo-LEX OM also found cases of obstruction of free observation and intimidation of observers.

We also draw the reader's attention to the reporting of 17 cases of rumours of voter corruption, in particular by offering monetary rewards. About 60% of them refer to the PSs set up for voters of the Transnistrian region. In addition, we emphasize the cases of organized transportation of voters, which in proportion of 96% are reported from constituency no. 37.

Given that the shooting of the voting procedures was carried out during the Election Day, the incidence of the cases of interruption of the functionality of the video cameras increased by 2.2 times, compared to the presidential elections.

According to the findings of Promo-LEX in the current elections, despite legal bans, there were cases of electoral campaigning on Election Day. Moreover, compared to the second round of the presidential elections, the number of cases of campaigning or black PR was reported to have doubled on Election Day. And the presence of electoral materials, posters, electoral panels within the polling station (within 100 meters of the polling station) increased by 6 times.

The large number of ballot photographing or other violations of the vote secrecy remains a feature of the Election Day.

## **2.3. Description of incidents**

### **2.3.1. Restricted access, obstruction of free observation process in the polling station or intimidation of observers**

*Article 68 para. (5) of the Electoral Code stipulates that observers accredited by the CEC may monitor the electoral process throughout the country and in all polling stations, and observers accredited by the DEC have access only on the territory of that constituency. Accredited observers have the right to attend all electoral operations, all meetings of electoral bodies, including on the Election Day, without intervening in the electoral process or other electoral operations, as well as to inform the chair of the PEB about the irregularities observed.*

According to reports submitted by the Promo-LEX OM observers, there were at least 12 cases, in which observers (including those representing electoral contenders) were restricted or denied free observation in the polling station or were intimidated in the realization of their duties of observers.

<i>Number of cases</i>	<i>Description</i>
<b><i>Obstruction of free observation</i></b>	
<b>6 cases</b>	<b>Restriction of access to the polling station (4 cases):</b> PS 4/39; PS 32/30 (prohibition of movement through the PS); PS 37/11; PS 37/22; <b>Prohibition of photo filming in the polling station (1 case):</b> PS 38/147; <b>Refusal to provide information on participation rate (1 case):</b> PS 25/38.
<b><i>Intimidation of observers</i></b>	
<b>6 cases</b>	<b>By PEB members (2 cases):</b> PS 38/147; PS 38/58. <b>By other people (3 cases):</b> PS 16/33; PS 38/4; Cocieri, Transnistrian Region <b>By another observer (1 case):</b> PS 1/35.

### ***2.3.2. Ballot boxes were not sealed according to legal procedures / breaking / damage or absence of seals on ballot boxes***

According to art. 60 para. (1) of the Electoral Code, on Election Day, at 07.00, the chair of the PEB verifies the ballot boxes and seals them in the presence of at least half of the members of the bureau. As stated on pages 26 and 27 of the CEC Instruction on securing the PS infrastructure, the ballot boxes are secured by sealing. Stationary ballot boxes are sealed by 4 self-locking seals, and mobile ballot boxes by means of 1 (one) seal.

Observers of the Promo-LEX OM found 19 cases of non-compliance with the legal procedures for sealing ballot boxes, most of them due to the receipt of an insufficient number of seals, namely:

<b>Ballot boxes were not sealed according to legal procedures</b>					
<i>EC</i>	<i>Cases</i>	<i>PS</i>	<i>EC</i>	<i>Cases</i>	<i>PS</i>
1	6	2; 9; 26; 71; 208; 291	27	2	1; 13
11	1	39	33	1	24
13	3	4; 7; 12	36	2	7; 13
18	3	53; 55; 70	38	1	92

### ***2.3.3. Presence of campaigning materials, displays, electoral panels in the polling station (within 100 meters of the PS)***

According to art. 60 para. (7), on Election Day, the responsibility for ensuring order in the polling station and on the surrounding territory, within 100 meters of the polling station, shall be borne by the chair of the PEB. Decisions made in this respect are enforceable for all.

Promo-LEX observers found 57 cases of presence of campaigning materials, posters, election panels in the polling station (within 100 meters of the polling station), which shows an 83% increase compared to the second round of presidential elections of November 2020.

<b>Presence of campaigning materials, posters, election panels in the polling station</b>		
<i>Beneficiary</i>	<i>Polling station</i>	<i>PS number</i>
<b>PAS</b>	PS 1/257; PS 4/37; PS 7/41; PS 11/14; PS 11/30; PS 15/5; PS 20/66; PS 24/6; PS 27/22; PS 28/8; PS 29/32; PS 32/1; PS 32/8; PS 32/16; PS 32/24	15
<b>AUR</b>	PS 7/41; PS 7/59; PS 15/5; PS 15/11; PS 24/6; PS 32/32; PS 37/40	7
<b>PPPDA</b>	PS 1/117; PS 16/2; PS 24/6; PS 32/23; PS 32/31	5

<b>PPCC</b>	PS 1/11; PS 7/51; PS 13/20; PS 24/6	4
<b>BERU</b>	PS 7/41; PS 7/59; PS 18/1; PS 24/6	4
<b>PDCM</b>	PS 20/66; PS 24/6; PS 32/31; PS 36/3	4
<b>PPS</b>	PS 1/15; PS 24/6; PS 33/26	3
<b>PDM</b>	PS 11/10; PS 15/5; PS 15/6; PS 24/6; PS 27/22; PS 32/31; PS 37/6	7
<b>PACE</b>	PS 1/302; PS 14/3; PS 24/6	3
<b>PPDA</b>	PS 1/257; PS 24/6; PS 32/31	3
<b>PLD</b>	PS 1/257; PS 24/6	2
<b>PUN</b>	PS 15/5; PS 24/6	2
<b>BECS</b>	PS 1/86; PS 1/94; PS 1/123; PS 1/246; PS 1/257; PS 4/17; PS 4/37; PS 6/38; PS 7/51; PS 9/8; PS 9/28; PS 11/10; PS 13/4; PS 15/5; PS 15/6; PS 15/8; PS 16/4; PS 18/55; PS 19/1; PS 20/66; PS 24/6; PS 25/28; PS 25/64; PS 24/6; PS 27/3; PS 27/37; PS 29/32; PS 31/4; PS 31/20; PS 31/30; PS 32/8; PS 32/31; PS 36/7	33
<b>MPSN</b>	PS 24/6	1
<b>PRM</b>	PS 24/6	1
<b>PN</b>	PS 24/6	1
<b>PPO</b>	PS 24/6	1
<b>POM</b>	PS 24/6	1
<b>PS</b>	PS 24/6	1
<b>PVE</b>	PS 24/6	1
<b>NOI</b>	PS 24/6	1
<b>PPM</b>	PS 24/6	1
<b>Veaceslav Valico (IC)</b>	PS 24/6	1

### 2.3.4. Unjustified presence of unauthorized persons within 100 m and inside the PS

According to art. 60 para. (8) of the Electoral Code, the activity of the election bodies can be attended by: members / representatives of the hierarchically superior electoral bodies; representatives of electoral contenders in the electoral bodies; national / international observers accredited by the respective bodies, as well as their interpreters, as the case may be; media representatives. According to art. 60 para. (7) of the Electoral Code, on Election Day, the responsibility for ensuring order in the polling station and on the surrounding territory, within 100 meters of the polling station, shall be borne by the chair of the PEB, and the decisions taken in this respect are enforceable for all.

Promo-LEX observers found at least 24 cases when certain categories of unauthorized persons were inside the PS or within 100 m of the polling station, for a period of time greater than the permissible limit according to legal provisions.

<b>Unjustified presence of unauthorized persons within 100 m and inside the PS</b>	
<i>Number of cases</i>	<i>Polling stations</i>
<b>6 cases</b>	<b>With the involvement of representatives of political parties or electoral contenders:</b> <b>BECS-</b> PS 7/51; PS 18/55; <b>PAS-</b> PS 37/8 (2 cases); <b>AUR-</b> PS 38/48; <b>PPPDA-</b> PS 37/4.
<b>6 cases</b>	<b>With the involvement of local elected officials (mayor, local councillor, district president):</b> PS 16/33 (2 cases); PS 16/39; PS 16/49; PS 18/32; PS 31/4.

<b>3 cases</b>	<b>Unjustified presence of the team „Gift for Moldova”:</b> PS 38/20; PS 38/22; PS 38/30.
<b>1 case</b>	<b>Unjustified presence of persons working in the building where the polling station is located:</b> PS 7/4.
<b>1 case</b>	<b>Unjustified presence of veterans who fought in the war on the left bank of the Dniester:</b> PS 37/33.
<b>7 cases</b>	<b>Unjustified presence of unidentified persons:</b> PS 7/63, PS 11/24; PS 22/43; PS 26/8; PS 27/33; PS 31/22; PS 35/38.

### **2.3.5. Rumours, attempts or even situations of material or monetary rewards offered to voters**

According to art. 41 para. (5) - (6) of the Electoral Code, electoral contenders are prohibited from offering money to voters, distributing free material goods, including those derived from humanitarian aid or other charitable actions, except for symbolic gifts, representing electoral or political campaigning, made from means declared from the “Electoral Fund” account, which bear the symbolism of the electoral contender and whose market value does not exceed 2 conventional units.

Promo-LEX observers found 17 cases of offering material or monetary rewards to voters. Of these, 10 cases (59%) are related to the PSs set up for voters of the Transnistrian region.

<b>Rumours, attempts or even situations of material or monetary rewards offered to voter</b>	
<b>Number of cases</b>	<b>Description</b>
<b>17 cases</b>	<b>Involving representatives of the BECS (7 cases):</b> PS 37/30; 37/11 (2 cases), 37/12; the Transnistrian region; 15/14; 18/22. <b>Involving representatives of the PPS (2 cases):</b> PS 35/38; 15/14; <b>Involving representatives of the PDM (1 case):</b> PS 4/34; <b>Involving representatives of the BERU (1 case):</b> PS 1/95;
	<b>Involving unidentified electoral contenders (6 cases):</b> Transnistrian region (2 cases); 38/30; 37/35; 37/21; 37/25.

### **2.3.6. Electoral campaigning on Election Day**

According to the Electoral Code, art. 52, para. (10), on Election Day, no electoral campaigning is allowed inside the polling station or at the entrance to the polling station.

Observers of the Promo-LEX OM reported at least **29 cases** that could be qualified as acts of electoral campaigning or black PR carried out either at the entrance or inside the polling station to influence the sympathy of voters, which shows a 37% increase compared to the second round of the presidential elections of November 2020. Thus, with the involvement of the representatives of PPS, PAS, PPPDA, 1 case was identified for each party, BECS - 2 cases. In another 20 cases of campaigning inside the PS, voters were involved, in 4 cases observers failed to identify the beneficiaries.

<b>Electoral campaigning inside the PS or at the entrance to the PS</b>		
<b>Agitator</b>	<b>Polling stations</b>	<b>No. of cases</b>
<b>PAS</b>	PS 32/23	1
<b>PPS</b>	PS 9/22	1

<b>BECS</b>	PS 28/17; PS 32/10	2
<b>PPPDA</b>	PS 38/46	1
<b>Voter</b>	PS 1/61; PS 1/191; PS 1/206; PS 4/37; PS 4/24; PS 7/27; PS 28/27; PS 31/14; PS 32/15; PS 36/19; PS 37/10 <sup>2</sup> ; PS 37/20; PS 37/31; PS 37/41; PS 38/33; PS 38/73 <sup>2</sup> ; PS 38/147 <sup>2</sup>	20
<b>Unidentified</b>	PS 1/120; PS 37/34; social networks	4

### **2.3.7. Organized transportation of voters (cars, minibuses or other units of transportation that would not normally be around the PS)**

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

The Promo-LEX OM observers identified at least **22 PS**, respectively **29 cases**, where situations that can be interpreted as organized transportation of voters occurred. 28 of them (about 97% of the total) refer to the PSs in the constituency set up for the Transnistrian region. Also, considering the number of transport units involved, the PS in Constituency no. 37 clearly stands out from the other polling stations.

<b>Organized transportation of voters</b> <i>(cars, minibuses or other units of transportation that would not normally be around the PS)</i>			
<i>Constituency</i>	<i>No. of cases</i>	<i>PS number</i>	<i>Number of transportation units involved</i>
<b>13 Donduseni</b>	1	PS 1	<b>Repeatedly:</b> 1 car
<b>37 Transnistrian region</b>	28	PS 7, 8, 11, 12, 15, 18, 23, 24, 25, 26, 27, 30, 31, 33, 35, 36-37, 41.	At least 110 cars; 8 minibuses; 2 buses. <b>Number of persons transported greater than the capacity allowed:</b> 27 cars and minibuses. <b>Repeatedly:</b> 20 cars; 7 minibuses.

### **2.3.8. Unjustified cessation / suspension of voting in the polling station**

*According to art. 56 para. (1) of the Electoral Code, on the Election Day, it is prohibited to close the polling station and suspend the voting, except for cases of mass disorder, natural disasters, other unforeseen circumstances, which endanger the voter's life or make impossible the voting process.*

Observers of the Promo-LEX OM identified 12 PSs, in which the voting process was unjustifiably suspended for various periods of time between 5 and 15 minutes, or the voting process stopped before 21.00 due to the fact that the PEB ran out of ballot papers.

<i>Number of cases</i>	<i>Description</i>
<b>Unjustified suspension of voting</b>	
<b>12</b>	<b>To disinfect the premises of the polling station (5 cases):</b> PS 37/36; 1/11, 1/10 (2 cases), 30/11. <b>Due to deficiencies in the operation of SIAS Elections System (4 cases):</b> PS 28/54; 1/233; 13/1; 28/54. <b>As a result of power outages (3 cases):</b> PS 28/41; 9/36; 30/19.

### 2.3.9. Deficiencies in the operation of SIAS Elections System

Paragraph 61 of the Regulation on the activity of PEB states that the member of the bureau shall hand over the ballot paper to the voter only after the voter has been verified in the SIAS Elections System and all the conditions for voter participation in the respective polling station have been met.

Promo-LEX observers found **28 problematic situations**, when SIAS Elections System suffered both technical deficiencies (cessation of operation, loss of Internet connection) and content (inconsistencies between the data in the voter's identity documents and those in SIAS Elections System, situations when the system shows that the voter has voted, although he did not, issues related to the rounding of voters to polling stations).

Deficiencies in the operation of SIAS Elections System		
Type of deficiency	Polling Stations	No. of cases
Technical deficiencies	PS 1/222; 18/2 (2 cases); 29/46; 9/2; 26/12; 29/46; 37/36; 1/222; 38/36 (2 cases); 28/54; 28/48; 22/1; 28/21; 1/10; 1/135; 7/23; 18/14; 1/242.	20
Content deficiencies	PS 18/2; 7/5; 37/34; 27/39; 1/61; 1/79; 38/37; 18/64.	8

### 2.3.10. Deficiencies in the electoral rolls (lists)

Electoral rolls, drawn up on the basis of the State Register of Voters, are lists that include all citizens with the right to vote who reside or have their residence on the territory of a precinct. The voter can only be registered in a single electoral list and in a single precinct.

According to observers of the Promo-LEX OM, at least 23 cases of deficiencies in the electoral rolls were reported, as follows: discrepancies between addresses (10 cases), deceased voters (11 cases) and foreigners registered at the voters' domicile address (2 cases).

Deficiencies in the electoral rolls (lists)		
Type of deficiency	Polling Station	Number of cases
Discrepancies between the addresses	PS 1/100, 25/64; 1/86; 1/61; 1/26; 1/100; 1/81; 1/95; 1/10; 1/215.	10
Foreigners registered at voters' domicile	PS 1/291; 1/191	2
Deceased voters on the rolls	PS 11/2; 1/242; 1/291; 7/5; 1/64; 36/12; 1/95; 36/12; 1/239; 1/206; 1/61.	11

### 2.3.11. Photographing of ballots, other methods of violating vote secrecy

According to point 68 of the Regulation on the activity of PEB, it is forbidden to photograph the completed ballot paper. According to point 19 of the Instruction on securing the PS infrastructure, the secret voting booths shall be located in such a way that their exposed part is oriented towards the free wall of the PS room, at a distance of not more than 1 m.

According to the reports presented by the Promo-LEX OM observers, the photographing of ballot papers, as well as other forms of violation of the secrecy of the ballot, by incorrect positioning of the voting booth, or deliberate disclosure of the voting option, were reported in at least **100 cases**.



Photographing of ballots, other methods of violating vote secrecy	
Number of cases	Polling stations
83 cases	<p><b>Photographing of the ballot:</b>  <b>PEB members involved in resolving the incident when voters photographed or attempted to photograph ballots (55 cases) in the following PSs:</b> 1/10; 1/31; 1/91; 1/104 (2 cases); 1/108; 1/114; 1/117; 1/121; 1/136 (2 cases); 1/137; 1/153; 1/191 (2 cases); 1/198; 1/200; 1/222; 1/230; 1/233 (2 cases); 1/242; 1/248 (2 cases); 1/252; 1/304; 2/35; 7/12; 8/8 (2 cases); 9/6; 9/14; 9/29; 9/36 (2 cases); 10/1; 11/2 (2 cases); 13/1; 20/48; 30/6; 35/7; 35/35; 37/9; 37/10 (2 cases); 38/4 (2 cases); 38/5; 38/46; 38/48; 38/73; 38/124; 38/147 (2 cases).</p> <p><b>PEB members did not involve in resolving the incident when voters photographed the ballots (13 cases) in the following PS:</b> 1/98; 1/136; 1/198 (2 cases); 10/7 (2 cases); 13/27; 24/6; 25/56; 32/10; 35/7; 38/65; 38/9.</p> <p><b>There are no data on involvement or non-involvement in the case of photographing the ballot, (15 cases) in the following PS:</b> 10/2; 38/5 (3 cases); 38/22; 38/46; 38/48 (3 cases); 38/49; 38/65; 38/116 (2 cases); 38/147; 38/124.</p>
3 cases	<b>In the following PSs, the voting booths were positioned in such a way that the secrecy of vote was not ensured:</b> 1/192; 13/12; 25/39.
14 cases	<b>Intentional disclosure of the voting option:</b> 11/1; 11/10 (2 cases); 35/7; 37/10 (6 cases); 37/19; 38/46 (2 cases); 38/73.

### 2.3.12. Unjustified group voting (there are 2 or more people in the voting booths)

Art. 5 and 6 of the Electoral Code stipulate the universal principles underlying democratic elections, namely **direct and secret voting**, i.e., the voter votes personally, secretly, thus excluding the possibility of influencing the will of the voter. Voting in place of another person is prohibited. The voter who is not able to complete the ballot independently has the right to invite another person to the booth, except for PEB members, representatives of electoral contenders / referendum participants and persons authorized to attend electoral operations.

Promo-LEX OM observers reported at least **31 cases** that could be qualified as violation of direct and secret voting or unjustified group voting, which denotes a 68% increase compared to the second round of presidential elections of November 2020.

Unjustified group voting		
Total number of cases - 31		
PSs where PEB members were involved - 13	PSs where PEB members did not react - 13	No data available - 5
PS 1/86; PS 1/182; PS 1/198; PS 1/252; PS 9/6; PS 27/3; PS 32/10; PS 32/30; PS35/7; PS 36/12; PS 37/4; PS 37/35; PS 38/4	PS 1/99; PS 1/151; PS 1/201; PS 10/5; PS 11/1; PS 11/2; PS 11/24; PS 11/38; PS 11/41; PS 34/3; PS 37/28; PS 38/46 <sup>2</sup>	PS 13/27; PS 37/35; PS 38/40; PS 38/46; PS 38/48

### 2.3.13. Power outages

In accordance with point 1 of the Decision dated May 7, 2021, on additional responsibilities of some central public administration authorities, local public administration authorities and institutions, related to ensuring the smooth conduct of the early parliamentary elections, electricity distributors are responsible for **constant and uninterrupted** electricity supply to the premises of the PSs and of the electoral bureaus, according to the territorial areas of activity.

Promo-LEX OM observers reported a total of at least 4 cases of power outages during the Election Day.

Power outages	
Number of cases	Polling stations
1	PS 8/45
2	PS 9/6
1	PS 28/22

### 2.3.14. Problematic aspects in the process of closing the polling stations and vote counting

According to the information reported by the observers, the process of vote counting by the electoral bureaus was carried out in violation of the legal and normative provisions. Thus, the observers of the Promo-LEX OM attested at least 13 cases of non-compliance with the vote counting procedure.

Problematic aspects in the process of vote counting procedure		
Problematic aspects	Polling stations	Number of cases
Cancellation of unused ballot papers before the expiration of the voting time	PS 32/030, PS 1/209, PS 1/233, PS 38/147,	4
Presence of unauthorized persons during the vote counting process	PS 32/10, PS 38/121	2
Stamps marked "Voted" were not removed and sealed before the counting of votes began	PS 38/147	1
Non-transparent counting process	PS 1/215	1
Voters enter the polling station after 21.00	PS 1/114, PS 38/119, PS 7/010, PS 1/119	4
Others	PS 37/032	1

### 2.3.15. Interruption of the shooting of electoral operations, other incidents related to the video recording of electoral processes

According to point 16 of the CEC Regulation on the operation of the video recording system in the polling stations, the chair of the PEB ensures the continuity of the video recording throughout the day, without obstructing the process by any person present in the polling station.

According to the reports submitted by Promo-LEX observers, at least 53 cases of incidents related to the shooting of voting operations during the day were reported.

Interruption of the shooting of electoral operations, other incidents related to the video recording of electoral processes	
Number of cases	Polling stations
53	PS 1/156; 1/91; 1/235; 33/24; 7/59; 1/218; 25/2; 10/48; 22/8; 1/209; 36/16; 13/24; 24/1; 33/3; 25/25; 10/13; 11/14; 33/24; 11/15; 7/59; 18/65; 38/40; 38/121 (2 cases); 21/42; 2/16; 1/240 (2 cases); 31/21; 7/51; 1/206; 37/14; SV 37/33; 25/64; 25/56; 7/31; 18/12; 30/23; 28/30; 28/7; 11/6; 1/71; 37/15; 1/245; 30/11; 7/5; 24/1; 25/2; 18/3; 38/123; 13/17; 25/64; 10/32.

### **2.3.16. Ballot papers not distributed to PEB members are not kept in a safe place inside the polling station**

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

Promo-LEX OM observers reported only 4 cases that can be qualified as acts of compromising the security of the voting process. The cases were detected in EC no. 38 - PSs 40, 57, 58, 78.

### **2.3.17. Acts of violence or intimidation of voters or other persons**

Promo-LEX OM observers reported a total of at least 9 cases of violence or intimidation of voters or other persons.

<b>Acts of violence or intimidation of voters or other persons</b>		
<b>Violations</b>	<b>Polling station</b>	<b>Number of cases</b>
<b>Acts of violence/ intimidation of voters</b>	PS 18/38; 37/11; 38/48; 38/58.	4
<b>Acts of violence/ intimidation of PEB members</b>	PS 8/39; 1/138; 38/48; 1/144; 38/46.	5

### **2.3.18. Others**

Among the 16 incidents assigned to the category of *Others*, we would specify (see the full list in Annex 1): lack of information on the number of the PS; obstructing access in order to exercise the right to vote; non-compliance with legal provisions by PEB members; inadequate performance of PEB members and persons authorized to attend electoral operations; attempted repeated voting; inappropriate voter behaviour. Compared to the second round of the presidential elections, we witness a decrease of 47% in this category of incidents.

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

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

In the framework of the observation mission for the early parliamentary elections of 11 July 2021, the Promo-LEX OM analysed the correctness of completing 2,140 protocols out of a total of 2,150 protocols drawn up. Of these, 802 were received in paper format by static observers and mobile teams, who attended the procedures for closing polling stations and vote counting. Another 1,338 copies were obtained in photo format by long-term observers at the DEC's while being received from the PEBs.

By the date of publication of the present Report, the Promo-LEX OM could not have access to 10 protocols drawn up in the polling stations of constituency no. 38 (located abroad), despite the fact that the OM addressed DEC no. 38 and checked the protocols uploaded on the website of the CEC. In this case, PS no. 008; 012; 061; 062; 077; 099; 110; 112; 135; 144 are concerned.

Following the analysis of the correctness of the protocols drawn up, the Promo-LEX OM identified 24 protocols containing 44 errors, detected based on the verification formulas (see Annex 2).

*Table 5. Type and number of errors identified*

TYPE OF ERROR	NUMBER
D == F+H	7
E == C-D	1
I == C+J	6
H == G1+G2	17
F == D-H	7
J == I-C	6

The correctness of the protocols was made based on the formulas inserted in the text of the protocols:  $d = f + h$ ;  $e = c-d$ ;  $f = d-h$ ;  $h = g1 + g2 + gn$ ;  $i = c + j$ ;  $j = i - c$ .

The *formula*  $d = f + h$  was not observed in 7 protocols. In these cases, it was not possible to demonstrate that the number of ballot papers extracted from the ballot boxes coincided with the sum of invalid and validly cast ballots. Thus, doubts may arise regarding the correctness of the counting of validly cast ballots, respectively of the contenders' results.

The *formula*  $e = c-d$  was not proven in the case of 1 protocol. Respectively, in one PS, the number of signatures on electoral rolls would not coincide with the number of ballot papers in the ballot boxes.

The *formula*  $i = c + j$  could not be correctly applied in the case of 6 protocols. The same situation being attested in the case of verification according to the formula  $j = i - c$ . In this way, *either the unused and cancelled ballot papers were incorrectly counted or the signatures on electoral rolls*. Moreover, we find that the expression "unused and cancelled" may mislead PEB members, who may associate it with two distinct categories of ballot papers.

The *formula*  $h = g1 + g2 + gn$  was not complied with in 17 protocols (71% of the total number of protocols containing errors). We particularly emphasize this formula: the sum of the votes cast for contenders does not coincide with the total number of valid votes cast in the respective protocols. Questions appear regarding the correctness of the results for each electoral contender.

The formula  $f = d - h$  verifies the number of ballots declared invalid by subtracting from the total number of ballots the validly cast ones. Errors are reported when applying this verification formula to 7 protocols. The conclusions presented when verifying the formula  $d = f + h$  are valid in this case too.

Comparatively, the Promo-LEX OM points out that the number of erroneous protocols filled out by PEBs in the parliamentary elections is comparable to the data from the 2020 presidential elections.

*Table 6. Number of vote counting protocols counting errors (comparative perspective)*

	Presidential elections 2016, round II	Parliamentary elections, 2019 <sup>5</sup>	Local general elections, 2019	Presidential elections 2020, round I	Presidential elections 2020, round II	Parliamentary elections, 2021
<b>Erroneous protocols</b>	<b>34</b>	<b>142</b>	<b>24</b>	<b>27</b>	<b>16</b>	<b>24</b>

### 3.2. Comparative analysis of the data on the parallel tabulation of votes performed by Promo-LEX OM and the data announced by the CEC

The final tabulation of votes made by Promo-LEX OM, as in the case of the analysis of the correctness of completing the protocols, was made based on 2,140 vote counting protocols. The results of the CEC were calculated based on the total of 2,150 protocols drafted and submitted through the SIAS Elections System, as well as verified on the basis of the originals submitted by the DEC's.

For the final tabulation, the Promo-LEX OM processed both protocols received in paper format (802 copies) from observers in the polling stations and protocols in photo format (1,338 copies) obtained by long-term observers in the DEC's, as well as those posted on the CEC's website (in the case of PSs located abroad).

We also point out that the preliminary results drafted by the Promo-LEX OM were estimated at national level based on calculations performed strictly on the content of the protocols obtained from the sample of 600 PSs.

*Table 7. Parallel tabulation results*

No.	Contender	CEC, preliminary results	Promo-LEX, preliminary results, sample	CEC, Final results		Promo-LEX, Final results, 2140 PSs		Difference CEC, final vs Promo-LEX, final (%)
1.	Building Europe at Home Political Party (PACE)	1.28%	1.27%	1.28%	18781	1.26%	18907	+0.02%
2.	Collective Action Party — Civic Congress, Political Party (PPCC)	0.77%	0.91%	0.77%	11269	0.78%	11766	-0.01%
3.	RENATO USATÎ Electoral Bloc (BERU)	4.10%	4.13%	4.10%	60100	4.64%	69649	-0.54%
4.	SOR Political Party (PPS)	5.74%	5.83%	5.74%	84187	5.72%	85834	+0.02%
5.	Action and Solidarity Party (PAS)	52.80%	49.68%	52.80%	774753	51.80%	777284	+1.00%
6.	Electoral Bloc of Communists and Socialists (BECS)	27.17%	30.11%	27.17%	398675	27.77%	416666	-0.60%

<sup>5</sup> National constituency

7.	Professionals Movement 'Speranța-Надежда' (MPSN)	0.19%	0.19%	0.19%	2814	0.19%	2864	0%
8.	Democratic Party of Moldova (DPM)	1.81%	1.64%	1.81%	26545	1.79%	26790	+0.02%
9.	Dignity and Truth Platform, Political Party (PPDA)	2.33%	2.46%	2.33%	34184	2.31%	34606	+0.02%
10.	National Unity Party, (PUN)	0.45%	0.43%	0.45%	6646	0.45%	6713	0%
11.	Democracy at Home Political Party (PPDA)	1.45%	1.16%	1.45%	21255	1.39%	20929	+0.06%
12.	NOI Political Party (PPN)	0.10%	0.09%	0.10%	1431	0.10%	1448	0%
13.	Party for Developing and Strengthening Moldova, (PDCM)	0.43%	0.52%	0.43%	6315	0.43%	6483	0%
14.	ALLIANCE FOR THE UNION OF ROMANIANS, Political Party (AUR)	0.49%	0.50%	0.49%	7216	0.48%	7270	+0.01%
15.	Ecologist Green Party, (PVE)	0.08%	0.08%	0.08%	1202	0.08%	1231	0%
16.	Party of Law and Justice (PLD)	0.10%	0.09%	0.10%	1444	0.10%	1479	0%
17.	People's Power, Political Party (PPO)	0.11%	0.11%	0.11%	1613	0.11%	1648	0%
18.	Party of Regions of Moldova (PRM)	0.09%	0.08%	0.09%	1264	0.09%	1322	0%
19.	Patriots of Moldova Political Party (PPM)	0.06%	0.06%	0.06%	889	0.06%	933	0%
20.	Party of Change (PS)	0.17%	0.18%	0.17%	2455	0.17%	2525	0%
21.	NEW HISTORICAL OPTION, Political Party (NOI)	0.01%	0.01%	0.01%	197	0.01%	205	0%
22.	Working People's Political Party (POM)	0.10%	0.10%	0.10%	1467	0.10%	1498	0%
23.	Valico Veaceslav (Independent candidate)	0.17%	0.18%	0.17%	2514	0.17%	2604	0%

## ABBREVIATIONS

para. – paragraph

LPA – Local Public Authorities

Art. – Article

PSA – Public Service Agency

AUR – ALLIANCE FOR THE UNION OF ROMANIANS, Political Party

BECS - Electoral Bloc of Communists and Socialists

BERU – ‘RENATO USATÎI Electoral Bloc

PEB – Precinct Electoral Bureau

CALC – Civic Coalition for Free and Fair Elections

CEC – Central Election Commission

DEC– District Electoral Council

IC – independent candidate

CICDE – Centre for Continuous Electoral Training

NEPHC – National Extraordinary Public Health Commission

let. – Letter

MFAEI – Ministry of Foreign Affairs and European Integration

OM – Observation Mission

MPSN – Professionals Movement ‘Speranța-Надежда’

MHLSP – Ministry of Health, Labour and Social Protection

mun. – Municipality

NOI –NEW HISTORICAL OPTION, Political Party

No. – number

OSCE – Organization for Security and Cooperation in Europe

OSCE/ODIHR – OSCE Office for Democratic Institutions and Human Rights

LTO – Long Term Observer

STO – Short-Term Observer

PACE – Building Europe at Home Political Party

PAS – Action and Solidarity Political Party

PDCM – Party for Developing and Strengthening Moldova, Political Party

DPM – Democratic Party of Moldova

PLD – Party of Law and Justice

POM – Working People’s Political Party

PPCC – Collective Action Party — Civic Congress, Political Party

PPDA – Democracy at Home, Political Party  
PPM – Patriots of Moldova, Political Party  
PPN – NOI Political Party  
PPP – Patria, Political Party  
PPPDA – Dignity and Truth Platform, Political Party  
PPPO – People’s Power, Political Party  
PPS – Sor Political Party  
PRM – Party of Regions of Moldova  
PS – Party of Change, Political Party  
PSRM – Socialist Party of the Republic of Moldova  
PUN – National Unity Party, Political Party  
PVE – Ecologist Green Party, Political Party  
REO – Registry of Electoral Officials  
SRV – State Registry of Voters,  
SIAS Elections – Elections Automated State Information System  
PS – polling station  
ATU – Administrative Territorial Unit  
USAID – United States Agency for International Development



## ANNEXES

*Annex no. 1. Other incidents*

<b>Others</b>		
<b>No. of cases</b>	<b>Description</b>	<b>Polling Station</b>
2	No information on the identification of the polling station	PS 11/37; PS 18/64
4	Obstruction of access to exercise the right to vote	PS 1/140; PS 37/41, PS 11/3; SPS 32/30
2	Improper performance of PEB members and persons authorized to attend electoral operations	28/61; 37/15
1	Attempt to vote / repeated vote	PS 38/78
1	Inappropriate voter behaviour	PS 30/26
6	Non-compliance with the legal provisions by PEB members (voting with mobile ballot box, procedure for completing the ballot paper)	PS 32/30; PS 38/46; PS 1/200; PS 32/31; PS 12/19; PS 33/30;
<b>A total of 16 cases</b>		

*Annex no. 2. Description of categories of errors in the protocols/ polling stations*

<b>No.</b>	<b>C/PS</b>	<b>Constituency/Settlement</b>	<b>No. of errors</b>	<b>Error</b>
1	06-034	Briceni - Pererita	5	D == F+H I == C+J F == D-H J == I-C H == G1+G2+...+G23
2	06-039	Briceni - Trebisauti	2	E == C-D H == G1+G2+...+G23
3	07-030	Cahul - Cislita-Prut	1	H == G1+G2+...+G23
4	07-032	Cahul - Colibasi	2	I == C+J J == I-C
5	08-046	Cantemir - Tiganca	1	H == G1+G2+...+G23
6	09-026	Calarasi - Oniscani	1	H == G1+G2+...+G23
7	10-015	Causeni - Chircaiesti	1	H == G1+G2+...+G23
8	01-225	Chisinau - Rascani	2	I == C+J J == I-C
9	17-002	Falesti - Falesti	1	H == G1+G2+...+G23
10	17-003	Falesti - Falesti	1	H == G1+G2+...+G23
11	17-007	Falesti - Albinetul Vechi	1	H == G1+G2+...+G23
12	17-063	Falesti - Scumpia	1	H == G1+G2+...+G23
13	17-064	Falesti - Taxobeni	2	I == C+J J == I-C
14	22-009	Leova - Iargara	2	D == F+H F == D-H
15	22-013	Leova - Baius	3	D == F+H F == D-H H == G1+G2+...+G23
16	22-017	Leova - Borogani	2	D == F+H F == D-H
17	22-024	Leova - Colibabovca	1	H == G1+G2+...+G23
18	22-040	Leova - Tigheci	1	H == G1+G2+...+G23
19	28-052	Singerei - Pepeni	1	H == G1+G2+...+G23
20	29-013	Soroca - Soroca	1	H == G1+G2+...+G23
21	29-065	Soroca - Vasilcau	2	D == F+H F == D-H
22	34-015	Telenesti - Chitcanii Vechi	5	D == F+H I == C+J F == D-H J == I-C H == G1+G2+...+G23
23	34-036	Telenesti - Scorteni	3	D == F+H F == D-H H == G1+G2+...+G23
24	36-051	ATUG - Congaz	2	I == C+J J == I-C