



**PRELIMINARY STATEMENT OF INITIAL FINDINGS AND RECOMMENDATIONS OF THE
NDI INTERNATIONAL ELECTION OBSERVER MISSION TO
MOLDOVA'S OCTOBER 20, 2024 PRESIDENTIAL ELECTION
AND CONSTITUTIONAL REFERENDUM**

October 21, 2024

This preliminary statement provides initial findings and recommendations of the National Democratic Institute's (NDI) international election observation mission (IEOM) for Moldova's 2024 presidential election and constitutional referendum, following voting and counting of the ballots on October 20.

NDI's 14-member international delegation included members from seven countries and was co-led by Pekka Haavisto, Member of the Finnish Parliament and Former Minister of Foreign Affairs of Finland, and Stephanie Rust, NDI's Chief Programs Officer.

After arriving in Moldova on October 15, the delegation met with a wide array of electoral stakeholders, including from the Central Election Commission (CEC), political parties, civic organizations including citizen observer groups, the judiciary, and media practitioners. Delegation teams deployed to Moldova's 32 raions (districts), the Autonomous Territorial Unit of Gagauzia and the municipalities of Balti and Chisinau. There they met with local election stakeholders and observed opening, voting, and counting processes on election day. As part of its observation, the delegation monitored the voting process in several polling stations set up for voters from localities located on the left bank of the Dniester river.

Through this mission, NDI seeks to: express the international community's interest in and support for inclusive, transparent, accountable and peaceful elections in Moldova; provide accurate, impartial, and timely information on the conduct of the 2024 presidential election and constitutional referendum; and offer practical recommendations based on internationally accepted practices to enhance the credibility of Moldova's electoral processes.

The delegation's observations build upon the findings and recommendations of a high-level pre-election assessment mission (PEAM) conducted in September. The IEOM conducted its activities on a strictly nonpartisan basis, without interfering in the election process, in accordance with Moldovan laws and the [*Declaration of Principles for International Election Observation*](#), and in coordination with other international election observer missions as well as citizen observers. The delegation's initial findings and recommendations are made in reference to international and regional standards for credible elections, including the [*Universal Declaration on Human Rights*](#) and the [*Existing Commitments for Democratic Elections*](#) of the Organization for Security and Cooperation in Europe (OSCE), as well as Moldova's legal framework for elections.

The delegation's findings and recommendations were also informed by NDI's programmatic work in Moldova, and ongoing monitoring efforts of the citizen election observation group Promo-LEX, the European Network of Election Monitoring Organizations (ENEMO), the International Republican Institute (IRI), and the OSCE Office for Democratic Institutions and Human Rights (ODIHR). The delegation is grateful for the warm welcome and cooperation it received from all Moldovans with whom it interacted. The delegation's work was funded by the United States Agency for International Development (USAID).

I. INITIAL FINDINGS AND RECOMMENDATIONS

The delegation's preliminary statement on Moldova's 2024 presidential election and constitutional referendum is based on an assessment of the broader electoral context, the pre-election period, and observations on election day of voting and counting. The critical processes of tabulating and announcing official results remain underway, and electoral challenges, if any, are yet to be adjudicated. NDI will publish its final observation report upon the completion of the election process, including a second round presidential election on November 3, 2024.

The organization and administration of the election were robust. A new Electoral Code enacted in 2022 provides a sound legal basis for the presidential election and constitutional referendum, including a legal basis for monitoring campaign finance and sanctioning illegal activities and a mechanism to facilitate the vote of Moldovans abroad through postal ballots. The delegation's interlocutors highlighted that the CEC and subnational electoral bodies are well respected, and have prepared for the elections in a professional, unbiased and effective manner. The CEC has made inroads in making the election process more inclusive by providing ballots in languages other than Romanian and Braille. It has taken further steps to make accommodations for voters with disabilities through the provision of mobile polling booths, even as wheelchair access to voting locations continues to be sparse. All political parties and independent candidates were able to campaign unimpeded, and the campaign period was in general calm and orderly. Moldovan police have taken steps to investigate and address foreign interference. Social media monitors highlighted a reduction in social media attacks on women engaged in the political process.

However, based on the delegation's observations during the election period and reports by a broad range of interlocutors, there are dynamics that challenge the integrity of the presidential election and constitutional referendum.

The delegation concluded that the greatest threat to the integrity of these elections has been a broad and concerted campaign of malign foreign influence from Russia collaborating with some Moldovan actors through information manipulation, vote buying, and other illicit financing of political activity. This election process is taking place in a political context highly influenced by tensions over the geopolitical direction of the country - between those who seek greater integration with the European Union (EU), those who want strong ties with Russia, and those who would prefer to have both as partners. These tensions have been exacerbated by Russia's ongoing war against Ukraine.

While the 2024 election process is not yet complete, a number of issues of concern arose during the pre-election period that could undermine credibility of the process. There have been reports of a sustained, coordinated effort by foreign actors, in collaboration with Moldovan citizens, to corrupt voters' choices by transferring funds to their bank accounts and providing them instructions through messaging platforms on how to vote. In April, Moldovan police uncovered a coordinated attempt to bring into the country more than \$1 million by passengers on flights arriving from Armenia. Less than two weeks before the election, the police [unveiled](#) evidence of what they allege to be a Russia-backed network that aimed to influence the elections through large-scale voter bribery and the spread of disinformation.¹

In addition, local stakeholders shared with NDI observers anecdotes of vote-buying schemes underway in some villages. Civil society further raised concerns about the spread of disinformation, including the continued use of inauthentic content generated with artificial intelligence (AI) tools, the spread of doctored documents falsely attributed to government officials and the continued spread of false or misleading narratives about supposedly dire consequences of Moldova joining the European Union. Days before the election, the police announced that an investigation had revealed that more than 300 people had

¹ Moldova Police, "New methods of illegal financing of some political parties documented by PA and INI." 3 October 2024, <https://politia.md/ro/content/noi-metode-de-finantare-ilegala-unor-partide-politice-documentate-de-pa-si-ini>.

been trained by private paramilitary groups abroad in tactics that could be used to provoke civil violence and confront law enforcement.²

Of less magnitude, but still relevant, the delegation heard concerns about an overly restrictive legal framework regulating campaign activities and financing, and instances of use of state resources for campaign purposes, including the government's Europe for You campaign, political activity by officials during working hours, and the presence of pro-European messages in public buildings.

On election day, the mission deployed to all 32 raions, the municipalities of Chisinau and Balti, and the Autonomous Territorial Unit of Gagauzia. NDI's observers assessed that the opening, voting, closing and counting in the polling stations visited were transparent, that the process was calm and orderly, and that election officials followed the proper procedures established by the CEC.

The NDI mission stresses that this statement is preliminary in nature and includes initial findings and recommendations. If disputes arise as the tabulation of official results continues, we call upon all parties to resolve them peacefully and through appropriate procedural and legal channels.

The delegation congratulates the people, election authorities and political contestants of Moldova for conducting a participatory, credible and peaceful election, and offers the following practical recommendations that different stakeholders can take to enhance confidence in the tabulation and announcement of official results, ensure a successful second round presidential election, and increase the inclusion, transparency and accountability of future election processes.

To the Citizens of Moldova

- All Moldovans should refuse any attempt at voter corruption. If you sell your vote, you sell your freedom.
- Moldovans should be vigilant when receiving information on social media and the internet at large. Different perspectives should be sought before forming a political opinion and the decision regarding whom or what to vote for.

To the CEC

- Communicate, in a timely and frequent manner, with the Moldovan people and political contestants about all aspects of the tabulation of official results, and the resolution of any pending complaints, including providing electoral data in an easy-to-analyze format.
- Take proactive steps to counter misleading and false narratives about the election process and the tabulation of official results, particularly on social media.
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- Engage, with the support of the National Bank of Moldova, with local private banks in the earliest stages of electoral processes to design and implement efficient procedures to ensure that political contestants can open the bank accounts required by the Electoral Code without undue delay.
- Reassess PEB locations to ensure that they provide sufficient space to accommodate the influx of voters, are accessible to people with disabilities, are equipped with restrooms, and are heated.
- Provide all DEC's with a standardized electronic system to minimize or eliminate mathematical errors as they aggregate results information from the PEBs under their jurisdiction. If conducting two or more simultaneous elections, provide instructions to the PEBs on the order in which ballots should be counted to ensure consistency and reduce the information vacuum on election night.

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<https://privesc.eu/arhiva/107202/Briefing-de-presa-cu-tema--Actiunile-fortelor-de-ordine-pentru-contracararea-inten-tiilor-de-destabilizare-pe-teritoriul-Republicii-Moldova--in-perioada>

- Facilitate or commission an independent verification of the voter registry prior to the 2025 parliamentary elections.

To Parliament

- Ensure consistency in the legal framework governing traditional and social media to mitigate the threat of false and misleading information pertaining to Moldova’s elections while protecting legitimate speech, and empower the Audio Visual Council or a complementary body to monitor and implement that framework.
- Identify appropriate financial and administrative regulations to maintain the transparency and accountability of future political campaigns while taking into account capacity limitations of small parties and independent candidates.
- Engage in inclusive, consultative processes with political parties, civil society and technical experts in developing financial and administrative regulations and any substantial changes to the Electoral Code or related legislation.
- Avoid updating the Electoral Code and related legislation less than a year prior to future elections to ensure a stable legal framework.
- Consider allowing regulated, nonpartisan initiative groups to campaign for either the Yes or No option in a republican referendum to promote an inclusive debate on issues of national importance.

To Political Parties and Candidates

- Respect the role the CEC has in determining the official results for the election, and refrain from prematurely and unilaterally declaring a winner.
- Publicly and vigorously direct supporters to refrain from any acts of violence during and after the tabulation and announcement of official results.
- Work in good faith with the CEC to resolve any potential discrepancies that may arise during the tabulation of official results to ensure the results reflect the ballots cast.
- Publicly commit to seeking redress for any electoral complaints that may arise through proper legal channels and abide by the outcomes of judicial proceedings.
- The candidates that will participate in the second round presidential election should renew their commitment to a peaceful campaign.
- Participate in debates so that the voters can have an opportunity to compare and contrast different platforms.

To the Government

- Ensure a smooth and timely presidential transition, once all phases of the election are completed, in accordance with the Constitution.
- Redouble efforts to protect Moldova from coordinated foreign efforts to manipulate its information environment and influence its political processes, including by prosecuting to the full extent of the law those behind coordinated efforts to corrupt voters.
- Provide clear guidance to civil servants on activities they should avoid to ensure that they do not misuse state resources.
- Provide impartial information about a referendum, avoiding messages that could be interpreted as supporting either of the referendum options.

To the Judiciary

- Continue to play a strong and impartial role in adjudicating any disputes that may arise from the election.

To Civil Society, Religious Leaders, and the Media

- Civil society and the media, as well as the CEC, should proactively address rumors and false or misleading information about the election process, including the tabulation of official results and the conduct of the second round presidential election.

- Citizen watchdogs and observer groups should continue to independently assess the tabulation of official results, the adjudication of complaints and the conduct of the second round presidential election.
- The media should respect the role the CEC has in determining the official results for the election, and refrain from prematurely declaring a winner.
- In accordance with Moldovan legislation, religious leaders should abstain from participating in political campaigns.

To Social Media Platforms

- Take immediate and substantive steps to avoid their platforms being used by malign actors to promote false or misleading narratives for the duration of the 2024 election process, including the tabulation of official results and the conduct of the second round presidential election.
- Dedicate greater resources to identify false information and patterns of inauthentic behavior in messages targeting Moldovan citizens, including allocating more resources for analyzing Romanian and Russian content.

Multi Stakeholder Coordination

- Increase and strengthen coordination among the Central Election Commission, the police, the tax administration, the National Bank of Moldova and other control and oversight bodies to increase and improve control and oversight of financial flows.
- Make additional efforts to fully comply with international standards like those of the Financial Action Task Force (FATF), and consider requesting technical assistance to prevent and fight abnormal and illicit financial flows in future elections aimed at manipulating electoral processes.
- The Central Election Commission should improve its controls and oversight mechanisms to mitigate the misuse of state resources for political campaigns. The government and local administrations should support these efforts by strengthening their own preventive measures and controls, and the General Comptroller Office should enforce the applicable sanctions. Civil society organizations should consider developing or strengthening their capacity to exercise independent oversight of use of state resources for electoral campaigning.

Based on the CEC's preliminary results, on November 3 Moldovans will participate in a second round presidential election between President Maia Sandu and Alexandr Stoianoglo. The NDI mission encourages both candidates to conduct peaceful campaigns that focus on the issues of importance to the Moldovan people, and for eligible voters to exercise their right to vote.

Also, the preliminary results for the referendum indicate a close race. The delegation recognizes that the outcome of the referendum will be decided based not on preliminary results, but on the official tabulation being conducted by the CEC in accordance with the Electoral Code. The mission has all confidence that the CEC will undertake this process with the highest level of professionalism and impartiality, and urges all citizens and electoral actors to peacefully await the release of the official results.

Beyond the 2024 election, the delegation hopes that all Moldovans will work together to ensure that their country's democracy improves the lives of all its citizens, in particular marginalized communities including women, youth, ethnic minorities and persons with disabilities.

The NDI mission will continue to follow electoral developments, including the tabulation of official results, adjudication of disputes, announcement of official results, and swearing in of the next president, and may issue further statements and clarifications, as needed. Upon the conclusion of the 2024 election process, including the November 3 presidential runoff, NDI will issue a comprehensive report detailing final findings and recommendations.

I. DETAILED FINDINGS

Electoral Context

The presidential election and constitutional referendum are taking place in a political context highly influenced by longstanding tensions over the geopolitical direction of the country. The ruling Action and Solidarity Party (PAS) and others seek greater integration with Europe, while some opposition parties desire strong ties with Russia. While Moldova has been actively preparing for greater integration with the EU, it still has significant historic ties with Russia. The region of Transnistria, on the left bank of the Dniester River, is effectively under Russian control, while the Autonomous Territorial Unit of Gagauzia, within Moldova proper, is heavily influenced by Russia. These tensions have been exacerbated by Russia's ongoing invasion of Ukraine and potential threat to Moldovan sovereignty, which led to the Parliament declaring a state of emergency that was in effect for nearly two years, from February 2022 to the end of 2023. The tensions have also been worsened by Russia's alleged efforts to manipulate Moldovan public opinion and the information environment to advance pro-Russian parties and candidates. Within the context of the emergency legislation, the Shor Party, led by pro-Russian oligarch Ilan Shor, was banned by the Constitutional Court in advance of the 2023 local government elections.

Presidential Election

This is Moldova's third presidential election since the country reverted to direct elections of the president in 2016. The president serves as the head of state for a term of four years but has relatively limited powers compared to those of the prime minister, who is the head of government. However, unlike the prime minister, who is chosen by Parliament, the president is directly elected, giving the position greater standing and symbolic influence among citizens. Formal presidential powers include the ability to appoint the government; exercise certain foreign relations and national security powers (including representing the country abroad); promulgate laws (but also send them back to Parliament for further consideration); and dissolve the Parliament. The October 20 presidential election was contested among 11 candidates, including four women. Preliminary results indicate that there will be a runoff election on November 3, 2024 between President Maia Sandu and Alexandr Stoianoglo.

Constitutional Referendum

In announcing her intention to run for re-election, President Sandu also called for a referendum on European integration. Since her election in 2020, Moldova has moved closer to joining the EU. It received EU candidate status in June 2022, and accession talks began in December 2023. Moldova's Electoral Code was amended in January 2024 without public consultation to allow for the referendum on European integration to take place concurrently with the October 20 presidential election. Several opposition parties have questioned the need for a constitutional referendum and criticized conducting the referendum at the same time as the presidential election, arguing that it constitutes a political tactic by PAS to garner support for President Sandu's re-election effort.

Preliminary results indicate that the outcome of the referendum is close. The delegation trusts that the DEC and the CEC will conduct the tabulation of official results in a professional manner, and urges political contestants, the media and all citizens to await the announcement of official results before making any pronouncements on the outcome of the referendum.

Legal Framework

Electoral Code

A new Election Code enacted in 2022, in conjunction with the 1994 Constitution, the 2007 Law on Political Parties and other laws and regulations, provides a generally adequate framework for organizing

democratic elections. The legal framework outlines an election timeline, requirements for electoral candidates, the voting process, and the resolution of electoral complaints.

Two amendments to the Electoral Code enacted in 2024 are noteworthy. Without seeking public comment, in January 2024 Parliament eliminated a ban on referenda occurring the same day as presidential or parliamentary elections, thus paving the way for a simultaneous presidential vote and constitutional referendum on European integration. The Constitutional Court upheld the legality of the amendment, while opposition parties called it a political ploy to gain support for President Sandu. The non-partisan observer group Promo-LEX argued that [“the merger of ballots is not welcome as it can affect the equality of competitor’s opportunities and the voters’ freedom to form opinions.”](#) Parliament also amended the Electoral Code to allow the CEC to facilitate postal voting on a pilot basis, given the large number of Moldovan registered voters living abroad. However, stakeholders expressed concerns about the lack of political consensus on postal voting and limited transparency in the drafting of the postal vote legislation.

The Constitutional Court invalidated a third proposed amendment that would have barred from the ballot members of a banned political party - a move aimed at the Shor Party, which the Court banned in 2023 citing illegal financing. The European Commission for Democracy through Law (Venice Commission) and ODIHR found that the amendment would place a limitation on [“the right to stand for election \[that\] is too wide to be proportionate to the legitimate aims pursued.”](#)

Presidential and Referendum Thresholds

A presidential candidate must garner at least half of the valid votes cast to win the election in a first round. If no candidate obtains the required number of votes, a second round of voting is held two weeks later between the two leading candidates. Presidential elections in both 2016 and 2020 went to a second round.

For a constitutional referendum to pass, a majority of voters must support the measure.

Both the referendum and the first round presidential election require a turnout of at least one third of registered voters. A second round presidential election would require the participation of at least one fifth of registered voters.

Election Administration

Central Election Commission and Subnational Election Management Bodies

The CEC is appointed by Parliament, and is responsible for overseeing election administration. The body has nine members, one nominated by the president and eight nominated proportionally by parliamentary factions.³ Of the current members, one was nominated by President Sandu, five by PAS and three by the opposition Bloc of Communists and Socialists (BCS). The CEC told NDI’s PEAM that in the run up to the election they experienced staffing shortages, in particular in the legal department and IT staff. To ensure the integrity of the CEC’s technology infrastructure, the Commission’s technology systems were incorporated into the central government’s security protection mechanisms.

There are 37 second-level district electoral councils (DECs): 32 represent raions of the country; two are for the municipalities of Chisinau and Balti; one in the Autonomous Territorial Unit of Gagauzia; one for voters in Transnistria; and one for voters abroad. DECs include among their members individuals appointed by each political party represented in Parliament. The voting and counting processes are

³ The 2022 Electoral Code reduced the number of CEC members to seven and modified the way they are appointed. However, a transitory provision allows the members, nominated under the previous Electoral Code at different points of time, to complete their five-year mandates.

administered by 2,218 precinct electoral bureaus (PEBs), including 30 for Moldovans living on the left bank of the Dniester river, 228 for in-person voting abroad and three to administer postal voting. An additional three polling stations slated to open in the Russian Federation were not established. Each PEB has between five and 11 members, depending on the number of registered voters, with three members appointed by the local council and one member appointed by each of the three political parties represented in Parliament. Any remaining PEB seats are filled by DEC members from a cadre of citizens trained by the CEC.

The delegation consistently heard that the CEC and DEC members have conducted their work with efficiency and professionalism, and have backup systems in place in case of power or internet outages. On election day, delegation members found that PEBs conducted the opening, voting and counting process in accordance with CEC guidelines and regulations.

Presidential Candidate Registration

Under Moldovan law, presidential candidates can be nominated by either political parties or citizen-led initiative groups. In either case, candidates need to gather between 15,000 and 25,000 citizen signatures. Unlike in previous elections, in 2024 a citizen could sign in support of more than one candidate. For the first time, the CEC adopted regulations requiring presidential candidates to demonstrate their knowledge of Romanian, given article 136 of the Electoral Code which states that candidates for president must “possess the state language.”

Candidate registration ended on September 20, in a process assessed by interlocutors as fair. The final list of candidates included 11 individuals, including four women. The current president, Maia Sandu, stood as an independent supported by PAS; Alexandr Stoianoglo, Moldova’s former prosecutor general, stood as an independent supported by the Party of Socialists of the Republic of Moldova (PRSM); Irina Vlah, former governor (Baskan) of the Autonomous Territorial Unit of Gagauzia stood as an independent. Other candidates included Octavian Ticu, former member of Parliament of the newly formed pro-European “Together” bloc; and Vasile Tarlev, leader of the “Future of Moldova” bloc.

One candidate, Alexandru Arseni, withdrew his candidacy, and the CEC rejected the applications of three candidates, Valeriu Plesca, Vasile Bolea and Ludmila Corsun, prior to the signature gathering phase. Plesca was rejected due to irregularities in how he was selected to be the presidential candidate by the European Social Democratic Party (PSDE). Bolea’s independent candidacy was rejected because he is the leader of the “Victory” bloc, whose registration was rejected. Corsun was not allowed to stand because the CEC determined that she did not adequately speak Romanian. In addition, the CEC rejected the candidacy of Igor Munteanu for not having gathered sufficient signatures. In response, Munteanu announced he would appeal to the European Court of Human Rights. Not running are the country’s two most popular opposition leaders, former President Igor Dodon of PSRM and Ion Ceban, current mayor of Chisinau and leader of National Alternative Movement (MAN).

Referendum Campaigns

Moldovan law allows for the registration of electoral blocs to campaign for or against the options available in the constitutional referendum. However, unlike in presidential elections, the Election Code does not allow citizen-led initiative groups to participate in referendum campaigns. For the 2024 referendum, the Commission registered 13 political parties or blocs to campaign for a Yes vote and two for a No vote. On the grounds of insufficient information about the bloc’s financing or leader, the CEC refused to register the “Victory” bloc, which opposes European integration and was formed in Russia in April 2024 by convicted oligarch Ilan Shor. Interlocutors assessed the registration of referendum campaigns as fair, but some recommended that the possibility of campaigning for either option in the referendum be open to citizen-led initiative groups.

Voters Lists

In Moldova, the CEC continuously maintains the State Register of Voters (SVR), based on information from the population registry. The CEC [reported](#) on September 1, 2024 that there are approximately 3.3 million voters in the State Register of Voters (SRV), of whom 2.74 million live in the country's 32 districts and the municipalities of Chisinau and Balti and the Autonomous Territorial Unit of Gagauzia. The 274,718 voters registered in Transnistria, on the left bank of the Dniester River, and the 285,900 registered without a Moldovan address will not be included in the main voters list; instead, they will be added to a supplementary voting list on election day. Voters in medical institutions, prisoners and those homebound due to age, disability or illness were eligible to request to participate through mobile voting. In addition, voters who would not be at their registered address on election day could request absentee voter certificates to be able to exercise their vote in their current location.

Some Moldovan actors have raised concerns about those without addresses as well as the potential inclusion of deceased individuals. In addition to the inherent risks of illegal voting associated with inaccuracies in the SRV, an inflated voters' list could lead to an inaccurate estimate of the number of voters required to reach the turnout requirement for the presidential election and the referendum to be valid.

To ensure the accuracy of the SRV, citizens were able to review their information on the voters list by visiting their assigned polling stations or online on the CEC website. Voters could request any corrections until October 13. The final lists were distributed to PEBs as part of the election day materials.

While legally entitled to access to the SRV, including the basic voters' list and supplementary voters' list used on election day, the political parties and election observers in practice were not provided this information in an analyzable format consistent with the [Open Election Data Initiative](#) principles, making an independent assessment of the quality of those lists impossible.

Voting Abroad and Postal Voting

In 2020, it was [estimated that more than 1 million Moldovans had emigrated](#), compared to approximately 2.5 million residing in the country. For the 2020 presidential elections, more than 250,000 voted in the second round and some polling stations abroad ran out of ballot papers. The CEC announced a 66 percent increase in the number of polling stations for in-person voting abroad – from 139 to 231 – with the largest number in Italy (60) followed by Germany (26) and France (20). However, while the CEC ordered the installation of five polling stations in the Russian Federation, the Foreign Ministry and the respective DEC failed to create polling stations in St. Petersburg, Yaroslavl and Surgut. As a result, only 228 polling stations opened for in-person voting abroad, and the CEC destroyed all ballots – 13,000 for each election – allocated to these polling stations.⁴ In September and October, 2024, 21,073 voters submitted an optional, non-binding pre-registration to vote abroad.

The CEC conducted a postal voting pilot in Canada, Finland, Iceland, Norway, Sweden and the United States. By the legal deadline, the three postal PEBs received 1,344 ballots of the 1,808 mailed, a 74 percent turnout.⁵ On election day, over 240,000 eligible citizens cast votes abroad, including 1,344 through mail.

⁴ <https://www.infotag.md/politics-en/319392/>

⁵ https://www.ipn.md/ro/votul-prin-corespondenta-s-a-incheiat-au-fost-receptionate-8013_1108161.html

Results Transmission System

On election day, computer operators in PEBs used electronic systems to transmit a series of election information to a centralized database. Given recurring foreign attempts at destabilizing the election process and staffing challenges at the CEC, the security of these information systems was strengthened with support from the Information Technology and Cybersecurity Service.

Computers at each polling station were connected to a central database to validate each potential voter's presence in the SVR, to ensure that they had not already voted, and to provide real-time information on turnout, which was made public on the CEC website. Each PEB transmitted partial turnout data at pre-established times during the day. After closing and counting, each PEB transmitted the results information for both the presidential election and the constitutional referendum. This information was made available real-time on the CEC website at the raion level.

Political Parties and Campaigns

Campaign Environment

The campaign period began on September 20, 30 days prior to election day, with individual campaigns beginning their activities upon their registration by the CEC. Some political parties told the delegation that delays in opening a bank account and obtaining a bank card had resulted in a late start in campaigning. All presidential candidates had launched their campaigns by September 29. The campaign period ended on October 18, allowing one day of electoral silence before election day. On September 24, the CEC published a code of conduct by which contestants “undertook to conduct a fair electoral campaign under conditions of equal competition, to objectively inform the voters, to respect other participants in the electoral campaign, not to admit the use of sexist language and hate speech or other forms of gender-based violence.”⁶ On that day, the code of conduct was signed by seven presidential candidates and five parties participating in the referendum.

Interlocutors reported strict limitations on some campaign activities. The Electoral Code allows campaigning only by parties and initiative groups formally registered by the CEC to campaign for presidential candidates, and political parties registered to campaign for one of the two referendum options. In addition, the short duration of the campaign period – only 30 days – creates a long period of time when voters are aware of an election, but when parties are not permitted to impart information and voters are not allowed to receive information about that election. As a result, political competitors *de facto* begin campaigning before the official campaign period has begun.

During the official campaign period, campaign materials can only be posted in specific locations approved by local authorities, and private citizens are not allowed to post banners on their homes' fences. These strict limitations could restrict citizens' right to information about the election and electoral contestants, and private citizens' right to freely express their political preferences. It could also depress political activity during the campaign period, as witnessed by delegates prior to the period of electoral silence. The ban on referendum campaigning by civic organizations also dampened political discourse, sometimes resulting in penalties against organizations advocating either for or against European integration.

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https://a.cec.md/ro/candidati-reprezentanti-ai-candidatilor-la-alegerile-prezidentiale-si-participanti-2781_111382.html?fbclid=IwY2xjawFfuS9leHRuA2FlbQIxMAABHRpDhRUAiw3TJcP07NomErJsavyRFbiuMd5D1u6EIO_A8F0YfwsgSUNMg_aem_M2BgsBox8WICqPNFw-U1-Q

Vote Buying

As vote buying has historically been a widespread challenge to electoral integrity in Moldova, in 2024 the government added a new offense to the Contravention Code, “passive electoral corruption,” which penalizes citizens who accept an electoral bribe with penalties starting at 500 MDL (\$28).

During the September NDI PEAM, many stakeholders highlighted concern about the vulnerability of voters to vote-buying, particularly in the Autonomous Territorial Unit of Gagauzia and Transnistria. They alleged that the oligarch Ilan Shor was seeking to influence pensioners and public sector employees through direct payments.

Moldovan police announced that they had disrupted two distinct efforts this year to illegally use foreign funding to influence the outcome of the presidential election and constitutional referendum. In April, police announced that they had stopped a coordinated attempt to bring in around \$1 million using a network of 100 persons traveling from Armenia.⁷ In early October, the police announced a criminal case against a large scale network funneling money to influence the outcomes of the presidential election and constitutional referendum. The network promised money to more than 130,000 citizens in exchange for a No vote in the referendum and their vote for a presidential candidate to be communicated closer to the election. According to the police, both schemes were led by Shor and backed with Russian funding.⁸

For the period between August 20 and October 15, Promo-LEX observers reported 16 cases of “activities with potential to corrupt voters,” mostly related to the Victory political bloc and the Future of Moldova Party.

Misuse of Administrative Resources

The use of administrative resources for electoral advantage has been a long-standing challenge for Moldovan elections. The Electoral Code states that “[c]andidates shall be prohibited from using administrative resources, including by launching of infrastructure projects or public procurements carried out from the national public budget, the use of public equipment, means and goods, during the electoral period.” However, on October 9, less than two weeks before the election, the government announced that it would provide a bonus of 2,300 MDL (around \$130) to 30,000 pensioners.⁹ Stakeholders also raised concerns about misuse of administrative resources to encourage voters to vote Yes on the constitutional referendum. For example, Promo-LEX noted that the government-run Europe for You public information program, whose materials are branded with the Government of Moldova logo, appeared to encourage participation in the referendum by only those who support European integration. The delegation also identified PAS-produced pro-referendum stickers in some government buildings. While the government has a duty to inform voters as well as to combat false information, it should not do so in a manner that favors one side or the other. Interlocutors also noted that there were instances when government officials seemed to be campaigning while performing government functions during regular business hours.

For the period between August 20 and October 1, Promo-LEX observers reported 42 cases of misuse of state resources, including 37 involving PAS or President Sandu and five cases involving local public administration officials, the Together electoral bloc, the Revival Party, the Victory political bloc, and the Party of Development and Consolidation of Moldova. From October 1 to 15, Promo-LEX observers reported “at least 114” cases of misuse of state resources, including over 100 related to PAS or President Sandu.

⁷ <https://www.theguardian.com/world/2024/oct/12/moldova-fears-kremlin-fixing-eu-referendum-russia>

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<https://www.politico.eu/article/pro-russia-oligarch-network-influence-eu-moldova-elections-voter-bribery-disinformation/>

⁹ <https://www.facebook.com/GuvernulRepubliciiMoldova/videos/1919666821873895>

Campaign Finance

In an attempt to “level the political playing field” and mitigate the risk of illegal campaign financing, Moldovan authorities have in recent years sought to increase the transparency, and regulate the financing of electoral contestants (political parties and independent candidates) for all elections, including constitutional referenda. The 2022 Electoral Code introduced a series of innovations aimed at strengthening financial regulations including detailed and timely reporting on contributions, penalties for failure to provide financial reports, reduced limits on donations that could be made by party members in cash and increased penalties for violating regulations. The CEC also established ceilings for election campaign spending.

Electoral competitors were required to set up a specific bank account within three days of being registered, and to submit weekly financial reports during the month-long campaign period as well as a final report three days after elections. Some parties reported that banks delayed the opening of bank accounts or the provision of bank cards, effectively preventing them from starting their campaign. The short campaign period and cadence of required financial reporting has posed a challenge both for political campaigns and the CEC. Some political campaigns, especially those being conducted by smaller political parties or independent candidates, have struggled to comply with the weekly financial reporting required by law. On the other hand, it remains difficult for the CEC to enforce these provisions as it does not have adequate capacity to analyze in depth the copious amount of financial data submitted by campaigns.

According to Promo-LEX,¹⁰ by October 13 the 11 presidential campaigns reported a total income of 27.774.746 MDL (around \$1.54 million). During the same period, the presidential campaigns reported aggregate expenses of 24.71 million MDL (\$1.37 million).

Campaign	Income	Expenses
Sandu	8,989,747	8,786,109
Stoianoglo	6,067,441	4,167,948
Usatii	4,991,038	4,671,890
Other Candidates	7,726,520	7,084,486
Total	27,774,746	24,710,433

During the same period, only six parties submitted financial reports for the referendum campaign, reporting a total income for 4.51 million MDL (around \$250,000). The same parties reported total expenses for 3.85 million MDL (around \$215,000). The table below shows the total income and expenses reported by parties supporting a Yes vote and those who support a No vote.

Option	Income	Expenses
Yes	3,344,655	2,929,557
No	1,167,544	925,143
Total	4,512,199	3,854,700

¹⁰

<https://promolex.md/26228-raportul-nr-4-misiunea-promo-lex-de-observare-a-alegerilor-prezidentiale-si-a-referendu-mului-republican-constitutional-din-20-octombrie-2024/?lang=en>

Election Dispute Resolution

Voters, contestants, members of election administration, and observers can submit complaints related to the election and violation of rights at multiple levels, including at superior election commissions. Decisions by election commissions can be appealed through the judicial system. The CEC receives complaints related to presidential candidates and referendum contestants, violations of campaign rules, and financing. Complaints must be filed and decided on within three days; on election day, complaints must be decided on the day. According to an analysis by Promo-LEX, by October 15 the CEC had received 35 complaints, including on allegations related to the use of administrative resources and campaigning.

Information Environment

Attacks on the Integrity of the Information Environment

Foreign information manipulation and interference (FIMI) has long been widespread in Moldova and has intensified since the beginning of the Russian full-scale invasion of Ukraine. Experts [estimate](#) that for the local government elections in 2023 alone, Russia deployed the equivalent of \$50 million for false information and hybrid warfare efforts in Moldova. In addition to supporting pro-Russian political forces, the police alleged that funds were directed to flow to pro-Russian media, influencers and Telegram channels. Interlocutors assessed that a portion of Russian funds intercepted by the Moldovan police this year was destined to influence the information environment ahead of the October 20 elections.

In the second quarter of 2024, Meta's Adversarial Threats Report revealed a network of coordinated inauthentic behavior (CIB) targeting Moldova. The network promoted pro-Russian politicians and criticized the government, engaged in disinformation campaigns and opposed postal voting initiatives.¹¹ On October 11, Meta informed that in the third quarter of 2024, it had removed seven Facebook accounts, 23 pages, one group, and 20 Instagram accounts linked to a network that targeted Russian-speaking audiences in Moldova. Meta identified that the network also operated in other internet services, including Telegram, OK.ru, and TikTok.¹²

In September, NDI's PEAM identified FIMI as the biggest challenge to the integrity of the election and referendum. In meetings with the delegation, information integrity actors reaffirmed this assessment, stating that FIMI is as concerning as vote buying, illegal campaign financing and intimidation of electoral actors. According to their monitoring during the pre-election period, the social media environment was particularly polluted with misleading and manipulative information.

The impact of information manipulation on the ability of voters to obtain credible information about the election process has increased as social media becomes the predominant information source for Moldovans. According to a 2023 NDI Moldova poll, over 65 percent of citizens use social media to get informed daily, and it's the third most trusted source of information. Facebook, Instagram, Telegram, TikTok, Viber and YouTube are the most popular platforms among Moldovans.

Social Media Tactics

Reports by social media monitors and platforms indicate that most malign narratives are spread via an elaborate network of web pages, messaging apps and social media platforms, many of which are affiliated with pro-Russian activists and influencers. According to WatchDog.MD, since the beginning of

¹¹ <https://transparency.fb.com/sr/Q2-2024-Adversarial-threat-report>

¹² <https://about.fb.com/news/2024/10/taking-action-against-coordinated-inauthentic-behavior-in-moldova>

September there has been a spike of false or misleading narratives about the presidential election and the constitutional referendum. The most problematic narratives include those attacking the credibility of the election process (e.g. “The Government is preparing to rig the elections” or “The West is getting involved in rigging Moldovan elections,” “the opposition is not allowed to campaign against EU accession”) or the legitimacy of the referendum (“the referendum is being organized in violation of legal/democratic norms,” “by amending the Constitution, the Constitution is being annulled,” “the referendum is about a deceptive change to the Constitution”). Particularly troubling are narratives linking EU integration with “the loss of traditional values,” aimed at maintaining discriminatory practices against women and LGBTQI+ individuals.

Independent monitoring efforts indicate that, in Moldova, these narratives have been amplified through three complementary tactics. First, social media advertisement can help reach a large audience, while microtargeting specific audiences makes it more difficult to monitor and identify false or misleading information. Social media ads also can be financed by undisclosed sources, including foreign actors, making it difficult to track campaign spending and enforce transparency rules. Second, influencers often spread specific messages for a fee, without disclosing the payment. This can mislead the audience into believing the message is authentic, making it more likely that it will be trusted. Third, there has been an increase in the use of artificial intelligence and deep fakes in manipulating public opinion and spreading false or misleading information. In the months leading to the election, several deep fake videos with the likeness of President Sandu were launched on social media, depicting her in a negative light and attributing false statements to her, for example calling for the closing of schools or admitting destroying Moldova’s economy. Three days before the election, a [deep fake](#) video falsely depicted the president giving a speech with statements such as “nobody wants Moldova in the EU” and “Moldova is next to enter the war.”

Vulnerability to Information Manipulation

NDI research indicates that Moldovans are vulnerable to information manipulation. In a 2023 poll, nearly two thirds of respondents could not accurately distinguish true from false narratives. In a recent NDI poll in the Autonomous Territorial Unit of Gagauzia and the predominantly Russian speaking region of Taraclia, seven in ten residents mislabeled manipulative narratives. Elderly people, those with low income, TV viewers and people with strong pro-Russian attitudes are the most vulnerable. Gagauzia and Taraclia residents are highly critical and distrustful of all national authorities, see themselves as oppressed and reject any message about the EU. Still, more than 40 percent recognize their vulnerability to information manipulation and 60 percent say they encountered it over the last year.

Efforts to Counteract Information Manipulation

Multiple governmental bodies in Moldova are seeking to curb information manipulation, including FIMI. In 2022 and 2023, the Commission for Emergency Situations [suspended the licenses of 12 television channels](#) for “efforts to destabilize the situation in Moldova and serve the interests of other countries.” In 2022, the Security and Information Service (SIS) [blocked](#) 31 websites for presenting a threat to the national information space. In the first week of the electoral campaign period, the SIS blocked an additional seven Russian-affiliated websites.

In 2022, the Audiovisual Services Code was amended to include sanctions for spreading false information. In 2023, the government created the Center for Strategic Communication and Combating False Information, tasked with ensuring a holistic approach against FIMI in Moldova. Civil society is also involved: organizations like WatchDog.MD and the Association of Independent Press monitor the information space and counteract FIMI; the Independent Journalism Center runs media literacy courses; and media organizations like RISE or Ziarul de Garda investigate FIMI campaigns.

In contrast, the response of social media platforms to address FIMI has been lacking. Decisions on suspending malign or inauthentic accounts have been slow. Meta Trusted Partners have struggled to advocate for more active involvement and prioritization of Moldova in the electoral period. Calls from Moldovan actors for platforms to allocate more resources to combat FIMI in Moldova were echoed in October in a letter from the chair of the U.S. Senate's Foreign Relations Committee, Ben Cardin, to executives at Google and Meta.¹³ In October, Telegram [blocked](#) 15 channels and 95 chatbots reportedly affiliated with Ilan Shor at the request of Moldova's police, which alleged that they were used to illegally finance political parties and corrupt voters.

Traditional Media

The delegation heard that traditional media, particularly television and radio, are a more neutral and balanced source of electoral information. Moldovan stakeholders credited this to better regulation, the active role of the Audiovisual Council, and strong accountability mechanisms, protections that have yet to be extended to social media. However, according to a 2023 NDI poll, only one in four Moldovans trust the media, and most independent media outlets are strongly dependent on donor funding. This limits their capacity to produce quality content to compete with malign information, especially online.

Inclusive Elections

Women's Participation

On its face, women are playing a prominent role in this election. Four women, including the incumbent, are running for president; 40 percent of the current members of Parliament are women; and the chairpersons of the CEC and the Audiovisual Council are women. The Electoral Code calls for the principle of "gender equity" to be applied when forming election bodies. As a result, women are five of the nine members of the CEC and 71 percent of DEC members are women, including 59 percent of DEC presidents and 78 percent of DEC secretaries. Promo-LEX reported that women made up 90 percent of PEB members.

Interlocutors noted less discriminatory speech against women candidates, although it was also suggested that this may be on account of the fact that a number of women candidates represent opposition political parties that in recent elections have been the most virulent in their rhetoric against women candidates. There have been reports of voters' biases favoring men, the prevalence of cultural stereotypes about women, and the endemic societal violence against women in Moldova. President Sandu has been a target of false information questioning her sexual orientation and faced hostile and personalized attacks, including those based on her status as a single woman. [Two women journalists](#) were harassed while covering a pro-Russian demonstration in May. Interlocutors stated that women were much less likely to be included in election-related programming on television and other media. [UN Women](#) describes violence against women in Moldova as a "widespread and systemic phenomenon." These factors create barriers to women's full participation in political life despite Moldova being a signatory to the Istanbul Convention on preventing and combating violence against women and domestic violence.

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<https://www.foreign.senate.gov/press/dem/release/chair-cardin-urges-tech-companies-to-address-russian-disinformation-and-misinformation-ahead-of-key-referendum-in-moldova>

Persons with Disabilities

Both the CEC and observers have raised the issue of the accessibility of polling stations and CEC offices. For the [2020 presidential elections](#), Promo-LEX assessed that just over half of all PEBs and many DEC offices were not accessible to persons with mobility challenges. For these elections, only 30 percent of the 189 polling stations visited by Promo-LEX observers by October 1 were fully accessible and 34 percent partially accessible. The electoral administration allows "mobile voting" for voters with disabilities. Following a prior request, election commissioners visit voters at home with a small mobile ballot box. Concerns about transparency and potential voter fraud related to mobile voting have been raised. In 2023, the CEC adopted new regulations based on the United Nations Convention on the Rights of Persons with Disabilities to which Moldova is a signatory. The regulations call for the CEC to provide special equipment (such as templates for ballots, rulers, lamps, magnifying glasses, etc.) for persons with disabilities to facilitate their ability to exercise their right to vote without assistance. In a few stations visited by NDI observers, there were Braille ballots and magnifying glasses to allow those with visual impairments to cast their votes unassisted. Mission observers also noted that most of the observed polling stations were not easily accessible to those with mobility challenges.

*LGBTQI+ Inclusion*¹⁴

LGBTQI+ persons have limited rights and face significant discrimination. The LGBTQI+ community was able to organize a Moldova Pride March this year, but it required police protection. A counter-protest was organized in association with the Orthodox church. Pro-Russian efforts to undermine public support for the constitutional referendum have argued that European integration would require Moldova to legalize same-sex marriage. At the same time, even pro-European integration parties have downplayed the EU's commitment to human rights' protections for LGBTQI+ persons.

Voters from the Left Bank of the Dniester River

Transnistria is officially recognized as part of Moldova by the international community, but de facto operates independently and hosts a significant Russian military presence. The CEC installed 30 polling stations for eligible citizens from the left bank of the Dniester River to vote on the right bank, a decrease from the 42 polling stations installed in 2020. While citizens from the left bank of the Dniester can vote in Moldovan elections at special polling stations, concerns were raised during the PEAM that local leadership could discourage participation and that voters from Transnistria would have inadequate access to CEC voter education information and would receive selectively biased information related to the presidential and constitutional referendum campaigns. Other interlocutors noted that it was possible that voters who traveled from the left bank of the Dniester River would be prevented from voting when they arrived at designated polling stations. The delegation did not witness or hear any evidence that these were significant problems on election day.

Roma and Other Ethnic Minorities

Ethnic minorities are underrepresented in political parties and government at all levels in Moldova, and their concerns are rarely addressed. Major ethnic groups include Bulgarians, the Gagauz, Russians, Roma and Ukrainians. The Roma face the most discrimination as they frequently encounter prejudice and are excluded from political and public life. Many Roma citizens are unable to exercise their vote as they lack valid documents. Other ethnic minorities, such as the Gagauz, Russians and Ukrainians, are more integrated but still face second-class treatment from political parties. Despite efforts like the National

¹⁴ LGBTQI+ refers to Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex with the additional "+" to include other identities not encompassed in the short acronym.

Strategy for Consolidating Inter-Ethnic Relations, many ethnic minority issues remain unaddressed, and ambitious inclusion plans often exist only on paper.

For this election, the CEC announced that it would provide 2.1 million ballots in Romanian, 600,000 in Russian, and 115,000 in Ukrainian. The CEC will also make ballots available in Bulgarian, Gagauz and Romani. NDI observers noted that voter education materials were available in languages other than Romanian, including Bulgarian, Gagauz, Roma, Russian, and Ukrainian.

Civil Society Engagement

Independent, non-partisan citizen election observers provide impartial information about the electoral process, increasing transparency and ensuring accountability. They help to reduce the potential for violence and engage citizens in their elections. They do this all while maintaining civic space and ensuring the voice of civil society in the electoral process. For this election process, the CEC accredited Promo-LEX and three other organizations to train and deploy citizen observers:¹⁵

Organization	Observers
Promo-LEX	1,247
National Youth Council (CNTM)	41
Moldova Journalism School	16
I Love My City (Ador Oraşul Meu)	7
Center for Continuing Training on Elections (CICDE)	6
Association for Participatory Democracy (ADEPT)	5
Total	1,322

Prior to election day, Promo-LEX issued four reports reflecting its assessment of the pre-election period, which covered the organizations findings and recommendations related to the legal framework, election administration, the voters list, electoral competitors and campaigns, campaign finance, hate speech and incitement, vote buying, misuse of state resources and election dispute resolution.

Moldovan civil society has played an active role in this election process. Organizations like WatchDog.MD and the Association of Independent Press monitor the information space and counteract FIMI; the Independent Journalism Center runs media literacy courses; and media organizations like RISE or Ziarul de Garda investigate FIMI campaigns. Their findings are reflected in the Information Environment section of this statement.

Election Day

On October 20, NDI deployed 14 short term observers to observe the opening, voting, closing and counting processes in all 32 raions, the Autonomous Territorial Unit of Gagauzia and the municipalities of Balti and Chisinau, and including polling stations made available for voters from the left bank of the Dniester river.

The opening and voting process proceeded generally calm and orderly. PEBs were well organized, and PEB officials understood and adhered to established procedures. At all polling stations monitored by NDI observers, the polling station opened on time, ballot boxes were shown to be empty prior to voting, and election officials properly checked voters' identification before allowing them to vote. At all polling

¹⁵ <https://a.cec.md/ro/observatori-nationali-16213.html>

stations visited, party agents were present, most often representing PRSM and PAS. All aspects of the opening and voting process were visible to observers. At none of the polling stations visited was the voting process suspended or stopped prematurely.

On election day, NDI observers witnessed isolated incidents related to the coordinated transportation of voters, voters taking photos of their ballots, and unusual assisted voting; however, these incidents were not widely seen and did not affect the integrity of the election. Observers noted that most polling stations visited were not accessible to people with disabilities, and many lacked restrooms and heating. Some observed stations did not provide enough space to accommodate large numbers of voters without overcrowding.

The closing and counting process proceeded calmly and orderly, and according to CEC procedures based on NDI observers' monitoring. At all polling stations observed during closing, any voters in line during the time of closing were allowed to vote and closing occurred on time. In all polling stations visited for closing and counting, observers were able to observe, view the entire process, and were not restricted in their monitoring. Political party agents were widely present for the counting process, most often representing PSRM and PAS. All people present in the PEB during counting were able to verify the data reported in the minutes before it was signed. Officials followed CEC procedures for counting of ballots, and no complaints were filed with the PEB at all polling stations visited by NDI observers.