



ENEMO International Election Observation Mission

Local Elections of 5 and 19 November 2023 in the Republic of Moldova

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS SECOND ROUND

20 November 2023

The second round of elections was generally well managed at all levels by the election administration, including on election day, and minor procedural shortcomings did not negatively affect the elections. However, misuse of administrative resources marred the campaign, and campaign finance reporting and oversight remain to be improved. Attempts of third parties to interfere with the elections and disinformation tactics, which continued during the second round, remain a serious concern.

On 1 October 2023, the European Network of Election Monitoring Organizations deployed an International Election Observation Mission (IEOM), to observe the Local Elections of 5 and 19 November 2023 in Moldova. The Mission is composed of four Core Team experts, based in Chisinau, and four long-term observers, deployed in two teams, in the north and south of the country¹. The Mission remained in Moldova after the first round of elections to follow the runoff election, held on 19 November, as well as developments after the first round, including complaints and appeals. No additional short-term observers joined the Mission on election day.

The aim of the IEOM is to improve the transparency of the election process and assess its integrity and compatibility with international obligations of Moldova and standards for democratic elections, as well as the domestic legislative framework. ENEMO observers monitored and assessed the political and electoral environment, the right to elect and stand for election, conduct of election management bodies, campaigning, gender representation, electoral dispute resolution, and other crucial aspects of the process. On election day, the IEOM observed the voting, counting, and tabulation of results in a limited number of polling stations.

¹ Based in Balti and Comrat.

The Statement of Preliminary Findings and Conclusions for the second round follows the [Interim Report](#), issued on 30 October and the [Statement of Preliminary Findings and Conclusions](#) issued after the first round, on 6 November, and should be read in conjunction with those documents. This Statement is based on ENEMO's observation from 6 November to the second-round election day (19 November).

The Mission will continue to follow the electoral process, including resolution of existing and future potential complaints, as well as post-election developments. A final report, including a full assessment, which will depend in part on the conduct of the remaining stages of the election, as well as detailed findings and recommendations will be issued within sixty days from the certification of results.

ENEMO would like to express its gratitude to electoral management bodies, to election contestants, representatives of public institutions, civil society, media, international community, and all other organizations, institutions and individuals that cooperated with the mission.

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Preliminary Conclusions

Recognizing the progress made by Moldova on partly fulfilling the nine steps set out in the Opinion of the European Commission of June 2022, including by adopting the new Electoral Code last year, the European Commission recommended on 8 November that the European Council open EU accession negotiations with Moldova.

The Electoral Code establishes consistent and mostly unambiguous provisions for nearly all phases of mayoral runoffs, as well as repeat voting. Many shortcomings of the legal framework regarding the conduct of the second round of elections were addressed and clarified in the new 2022 Electoral Code, addressing some of ENEMO's previous recommendations. As already stated in the Statement of Preliminary Findings and Conclusions for the first round, ENEMO assesses that the legal framework provides conditions for holding elections in line with international commitments and standards.

The CEC performed within its designated mandate, demonstrating a collegial and transparent approach. Its sessions were open to accredited observers and the media. Sessions continued to be live-streamed and remained available online. The CEC efficiently published preliminary results and its decisions on its website, as well as the results of recounts from the first round, ensuring timely public access. Despite challenges faced, such as limited human resources, strict deadlines and a high number of complaints, requests and notifications, the CEC managed the processes, generally, with professionalism and transparency.

Overall, the DEC and PEBs were well-prepared for election day. They did not face any significant problems that might have burdened either their activities or the conduct of the voting process. A combination of experienced commission members and streamlined processes enhanced the efficiency and effectiveness of the election day procedures.

Elections were contested by 544 mayoral candidates in the second round, 488 of them representing political parties and 56 independents. Trends related to the deregistration of candidates continued in the second round. While ENEMO acknowledges the revocation of candidate registration based on serious irregularities in campaign finance reporting, the possible cases of deregistration based on ineligibility to stand for election or discrepancies in the supporting signatures lists should have been adjudicated right after the candidate registration period, within the prescribed deadlines. ENEMO deems that the ongoing dispute-resolution cases created uncertainty among the contestants, and possibly voters.

Provisions pertaining to the campaign period for the second round were introduced in the Electoral Code, as previously recommended by ENEMO. Campaigning resumed in line with the provisions of the Electoral Code, and no early campaigning was observed by ENEMO observers. The election campaign for the second round was low-key and subdued. As reported during the first round, ENEMO observers were informed of allegations of vote-buying, misuse of public resources, and workplace-related pressure on voters. The Government of Moldova continued to use financial incentives in the campaign, which is at odds with international good practice. Third-party campaigning and interference continued to be a serious concern.

ENEMO raises concerns that many electoral contestants did not properly follow campaign finance rules and principles, which together with late publication of the CEC campaign finance oversight reports limited overall transparency of campaign finance. Additionally, seemingly due to insufficient capacities and the financial reporting system not yet integrated with other systems, the CEC oversight seems rather superficial at this stage of the process. Various contestants also did not respect the CEC decisions to correct shortcomings within the prescribed deadlines, and the only sanctions applied by the CEC were belated warnings. ENEMO deems that in case of repeated violations and non-respected deadlines, the CEC could have considered applying more dissuasive sanctions.

The media landscape in Moldova remains a complex interplay of diverse outlets, including those of public interest, investigative journalism, and human rights advocacy, alongside politically controlled and business-oriented media. Media outlets faced obstacles in maintaining fair coverage of candidates, given issues such as non-cooperation and a lack of robust fact-checking. A noteworthy trend emerged as some candidates abstained from debates, influencing public discourse and potentially leading to a less informed electorate. This decision seemed to have been driven by strategic considerations, concerns about debate platform impartiality, or broader political calculations. Candidates often opted for alternative communication avenues, such as social media, public appearances, or outreach, bypassing traditional debates.

ENEMO notes that the Audiovisual Council (AVC) continued to operate with efficiency, transparency, and timeliness during the second round of elections, ensuring robust oversight in monitoring media activities. The second round was subject to a surge of hate speech on various social media platforms, illustrating instances where inflammatory language by politicians contributed to a heightened atmosphere of hostility. The shift to Telegram due to changes in Facebook's policy raises concerns about the potential impact of manipulative information, and the significant influence of TikTok, particularly among the younger demographic, underscores its role in shaping media trends and contributing to information dissemination.

ENEMO notes that timely legal remedy is a cornerstone of resolving electoral disputes according to international standards. Some cases regarding candidate registration were pending on election day or were filed even after the first round of voting. Delays in the processing of such appeals can undermine the integrity of the dispute resolution process.

The different forms of documents (notifications, requests, complaints/appeals) used to challenge the electoral process indicate a possible lack of understanding of procedural knowledge among participants, especially when the distinction between these is not explicitly clear. Additionally, a system with numerous submission formats puts a considerable administrative burden on electoral bodies. It requires them to process and respond to each type of submission according to the respective procedures, which can be resource intensive.

Election Day was generally calm and peaceful. At the limited number of polling stations observed by the mission, Election Day procedures were overall conducted efficiently and in accordance with the law. Sporadic minor procedural irregularities did not negatively affect the process. However, at a few polling stations observed, ENEMO observers reported instances of organized

transportation of voters and potential breaches of the secrecy of the vote. Turnout for the second round was lower than the first, at only 36.73 percent.

Preliminary Findings

Background

Deep political polarization continued in between the two rounds of elections, with some opposition parties calling for protests against the current majority or snap elections. Supporters of the “Chance” party, whose candidates’ registrations around the country were canceled just before the first round, held sporadic protests in some cities, while a number of complaints requesting the cancellation of the elections were filed by this party.

Recognizing the progress made by Moldova on partly fulfilling the nine steps set out in the Opinion of the European Commission of June 2022², including by adopting the new Electoral Code last year, the European Commission recommended on 8 November that the European Council open EU accession negotiations with Moldova. However, the Commission recommended that the negotiations framework be adopted once some key measures are adopted by the country, by fulfilling the remaining steps still to be addressed. The European Council will decide on the recommendation at its next meeting, to be held in mid-December 2023.

Legal framework and electoral system

The Electoral Code establishes consistent and mostly unambiguous provisions for nearly all phases of mayoral runoffs, as well as repeat voting. Many shortcomings of the legal framework regarding the conduct of the second round of elections were addressed and clarified in the new 2022 Electoral Code, addressing some of ENEMO’s previous recommendations³. As already stated in the Statement of Preliminary Findings and Conclusions for the first round, ENEMO assesses that the legal framework provides conditions for holding elections in line with international commitments and standards.

² [Commission Opinion on Moldova's EU membership application](#).

³ Inter alia, the start of the electoral campaign for the second round; the moment of reopening of electoral accounts of the contestants; the deadline for establishing the date of the second round and other.

After publishing the preliminary results of the first round of local elections, the CEC announced the second round on 19 November in the 273 localities⁴ where no mayoral candidate achieved a majority of the valid votes in the first one. The two candidates who gained the most votes in the first round were included in the ballot and the one gathering more votes was elected.⁵ In two localities, only one candidate was on the ballot, but these will be considered elected only if they gather at least half of the valid votes cast.⁶ At least 20 percent of voters registered in a given locality must participate for the election results to be considered valid for that respective locality. According to preliminary data provided by the CEC, participation below 20 percent was recorded in five localities where repeated voting took place.⁷

Additionally, repeated voting was held in eight localities, due to elections being declared invalid as the voter turnout failed to meet the minimum threshold of 25 percent of registered voters⁸ on 5 November. Furthermore, partial elections were scheduled to be held in March 2024 in localities where the "Chance" Party and its candidates were contesting the election unopposed in the first round, since no candidate was on the ballot after the registration of these candidates was canceled.⁹

Election Administration

In the second round of elections, the election administration maintained its four-tier structure as prescribed by the Electoral Code. The mandate of lower-level election management bodies (EMBs) in localities where a second round was held, was extended, respectively.¹⁰

The CEC performed within its designated mandate, demonstrating a collegial and transparent approach. Its sessions were open to accredited observers and the media. Sessions continued to be live-streamed and remained available online. The CEC efficiently published preliminary results and its decisions on its website, as well as the results of recounts from the first round, ensuring timely public access. Despite challenges faced, such as limited human resources, strict deadlines and a high number of complaints, requests and notifications, the CEC managed the processes, generally, with professionalism and transparency.

Overall, the DEC and PEBs were well-prepared for election day. They did not face any significant problems that might have burdened either their activities or the conduct of the voting process. A

⁴ [Decision](#) of the CEC #1546.

⁵ In case both candidates on the ballot receive the same number of votes, the one who gathered more votes in the first round is considered elected.

⁶ However, there are exceptions in two locations: the village of Cotova in the Drochia district and the Todirești commune in the Ungheni district, where only one candidate will be on the ballot.

⁷ These localities are village Chioselia, Rusă UTA Gagauzia; village Cotovskoe, UTA Gagauzia; Salcia commune, Taraclia; Village Dough, Taraclia; Nicolaevca commune, Florești.

⁸ [Decision](#) of the CEC no. 1544.

⁹ [Decision](#) of the CEC no. 1545.

¹⁰ [Decision](#) of the CEC no. 1547; [Decision](#) of the CEC no. 1548.

combination of recent experienced commission members and streamlined processes enhanced the efficiency and effectiveness of the election day procedures.

For the second round, 609 PEBs were operating, and 11 for repeated elections.

For the second round operated 609 PEBs, and 11 additional for repeated elections. There were no significant changes in the composition of PEB members that could impact their functioning, between the two rounds. The few instances of change were primarily isolated cases due to personal or health-related reasons.

However, the transparency of decision-making of lower-level EMBs remained partial even in the second round, with inconsistent publication of decisions concerning complaints and appeals, as well as various operational decisions. Some decisions were inconsistently published on the designated space on the CEC website, displayed on public boards at DEC's offices, or provided at the information desks of local public administrations.

Registration of voters

For the second round of local elections, the voting procedure was implemented using the same voter list as in the first round, encompassing 839,239 voters for the second round and 12,131 voters for the repeated elections. The CEC's decision no. 1538/2023 outlines specific conditions for exercising voting rights. The basic voter lists are not updated between the two rounds¹¹, thus persons who turned 18 between the two rounds were included in the supplementary voter lists.¹²

On November 15, the Public Service Agency announced¹³ that it would provide temporary identity cards at no cost to citizens who are over 18 years old and do not have an ID. Additionally, the agency announced that it would facilitate the registration of students and pupils who are eligible to vote and are enrolled in educational institutions in the localities where the second round of voting is occurring, upon their request.

On November 9, the CEC published instructions for voting by homebound individuals, clarifying the procedures for requesting a mobile ballot box for the second round. Notably, applications from the first round were deemed invalid for this round, necessitating new applications for those who needed to vote at their place of stay.

Overall interlocutors of the mission did not express significant concerns about the accuracy of the voters' list.

¹¹ Article 61, para. 11 of the Electoral Code.

¹² The Electoral Code does not explicitly specify if voters who turn 18 in the period between the two rounds have the right to vote. However, Article 14 states that anyone who has turned 18, even on Election Day, can vote.

¹³ [The statement of the Public Service Agency](#).

Candidate registration

Elections were contested by 544 mayoral candidates in the second round, 488 of whom represented political parties (348 men and 140 women) and 56 were independent candidates (38 men and 18 women).¹⁴ The highest number of candidates ran on behalf of PAS - 152 candidates, followed by PSRM with 74, PSDE with 61, 56 independents, and PDCM with 47.¹⁵

Trends related to the deregistration of candidates continued in the second round. On 7 November, DEC no. 2, Municipality of Balti, canceled the registration of the independent candidate for Balti mayor, Arina Corshicova, who was ranked second in the first round, with 21.52 percent of the votes.¹⁶ The DEC argued that Corshicova violated several articles of the Electoral Code, such as the use of illegal funds and exceeding the campaign finance ceiling. Moreover, Corshicova is on the international sanctions' lists, as she was the administrator of SRL "Telesistem TV," but she did not mention this fact during her registration. The DEC also quoted the investigation of the Balti Police Inspectorate that proved that the "Chance Party" was campaigning on behalf of Corshicova after their deregistration. Corshicova was finally deregistered for being among the individuals that could not stand for office as per the amendments made to the Electoral Code on 4 October 2023, and for exceeding the campaign finance expenditure ceiling.¹⁷ The CEC upheld the Balti's DEC decision¹⁸ on 10 November. The decision was further appealed unsuccessfully by Corshicova with all instances of the courts (Balti first instance court¹⁹, Balti Court of Appeal, and the Supreme Court of Justice). Three more complaints requesting deregistration of candidates after the first round were rejected by the relevant EMBs, while one candidate was deregistered by the Supreme Court of Justice on 10 November and the mandate of the elected mayor of Causeni was invalidated on 19 November.²⁰

¹⁴ [Statistics](#) published by the CEC.

¹⁵ Statistics from the portal [alegeri.md](#).

¹⁶ The petition to exclude Corshicova was filed on 1 November by the leader of the "Change party", Stefan Gligor, and the incumbent mayor and mayoral candidate of Balti, from the same party, Nicolai Grigorishin. Gligor [argued](#) that "Telesistem TV company, whose administrator is Arina Corshicova, is directly mentioned in the Constitutional Court's decision on the unconstitutionality of the "Shor" party. The authorities responsible for the implementation of the CC decisions and after the Parliament amended the Electoral Code, had to draw up a list of persons who could not run for office. Arina Corshicova was one of the individuals who could not be a candidate due to the CC's decision."

¹⁷ Balti DEC No. 2 Decision No. 239 quoted the Article 16 para. (2), lit f), Articles 50-59 and 102, para. (102), lit. a). After Corshicova's deregistration, the mandate of Balti mayor was contested by Alexandru Petcov (Our Party, 22,69% of votes in the first round), and Maxim Moroshan (PSRM, 19,73 percent in the first round).

¹⁸ The CEC [Decision](#) No. 1573 of 10 November. The CEC argued that there was a direct link between the former Shor party, the "Chance" party and Corshicova and that Corshicova is a reserve candidate of the party or a camouflaged electoral bloc, who in turn indirectly and directly used the resources of the "Chance" Party. The CEC referred to [Decision](#) No. 29 of the Constitutional Court of 9 December 2014 "Regarding the confirmation of the results of the parliamentary elections", which stipulates that in order to ensure fair conditions for all electoral contestants in the following elections, it is necessary for the competent authorities in electoral matters to exclude from the start the situations of camouflage of electoral blocs.

¹⁹ The Balti Court [decision](#) of 13 October.

²⁰ The PAS candidate for mayor of Orhei, Sergiu Stanciu, demanded the annulment of the elections in Orhei won in the first round by Tatiana Cociu (FASM) and requested her deregistration because of several violations. The second-level DEC rejected his complaint. Another complaint was submitted by Nicolai Grigorishin (Change party mayoral candidate in Balti) to deregister the FASM mayoral and councilor candidates in Balti for not being able to stand as candidates based on the Art. 16 para. (2) lit. e) of the Electoral Code. DEC rejected that complaint, but the CEC

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Regarding the revocation of the registration of all 8,605 mayoral and councilor candidates of the "Chance" Party throughout the country by the Commission for Exceptional Situations on 3 November, the "Chance" party appealed the CES decision to the Riscani court in Chisinau, which forwarded it to the Chisinau Court of Appeal.²² Since then, the decision at the Chisinau Court of Appeal is pending which affected the right to timely legal redress.

Electoral Campaign and Campaign Finance

Electoral Campaign

Provisions pertaining to the campaign period for the second round were introduced in the new Electoral Code, as previously recommended by ENEMO. On 8 November, the CEC officially declared the date of the second round for 19 November, the campaign started from 9 November. The official campaign period in the second round resumed in line with the provisions of the Electoral Code, and no early campaigning was observed by ENEMO observers. Local public

[admitted](#) it partially in the case of campaign finance irregularities (See the Campaign Finance subsection). The third complaint relates to the deregistration of the mayoral independent candidate Anna Onofrei in Vulcanesti (Gagauzia) for falsifications in the signatures lists. On 7 November, police seized the signatures lists and the investigation is ongoing. DEC Vulcanesti 36/3 voted twice against the de-registration of the candidate. The SCJ deregistered Ion Berladean (mayoral candidate in Cotova village, Drochia district) on 10 November because of his ineligibility to hold public office. Because of the deregistration, there remained only one candidate on the ballot box (See Legal Framework and Electoral System section). On 19 November, DEC 10/1 invalidated the mandate of the elected mayor of Causeni, Anatolie Dontu (PPDA), allegedly for the ineligibility of the public office.

²¹ Based on Article 100, para. (3) of the Electoral Code, the examination of appeals concerning the financing of political parties shall not be subject to the limitation periods provided for in the Electoral Code.

²² During the court hearing at the Chisinau Court of Appeal, the representatives of the CES put forth a formal request to remove the exception of unconstitutionality of the Article 225 paragraph (3) letter e) of the Administrative Code, which pertains to the proportionality and limits of judicial control. Based on this provision, the candidacy of the "Chance" party contestants was canceled. On 5 November, the Chisinau Court of Appeal admitted the request to lift the exception of unconstitutionality and sent the referral to the Constitutional Court (CC), to resolve it. The CC [declared](#) the referral regarding the unconstitutionality exception of Article 225 par. (3) inadmissible on 9 November. According to the disputed provisions, the CC can only be involved in reviewing certain circumstances, such as the proportionality of measures adopted by administrative acts, when individual and normative administrative acts are issued regarding national security or the implementation of a state of emergency. The Government could not be subject to making this request, as the Administrative Code was developed and adopted by the Parliament. The exception of unconstitutionality cannot be used by a public authority to annihilate a normative act adopted by another public authority.

authorities published information on available free or rented premises for campaign events, as well as areas for displaying campaign materials.

The election campaign for the second round was low-key and subdued. Candidates focused on strengthening coalitions while ensuring support from other parties and candidates rather than actively campaigning. Ideology or party programs did not seem to have played a significant role in the coalitions' formation. Candidates focused on the use of online and social media, as well as holding meetings with voters. As reported during the first round, ENEMO observers were informed of allegations of vote-buying²³, misuse of public resources, and workplace-related pressure on voters.

The ruling party candidates again benefited from the direct or indirect endorsement of high-level officials.²⁴ As mentioned in ENEMO's First Preliminary Statement, the legislation does not prohibit the involvement of high-level officials, including the Prime minister and ministers in the campaign. However, concerns remain that this practice gave an advantage to candidates from the ruling party at odds with the principle of separation between party and State.²⁵

Third-party campaigning and interference continued to be a serious concern. Former chair of the Sor party, Ilan Shor, promised further financial incentives and promoted social and infrastructure projects on his FB page, if voters would vote for the candidates supported by him.²⁶ On 7 November, the Bashkan of Gagauzia assured citizens²⁷ that the gas for the preferential price of 10 MDL per cubic meter for the citizens of Gagauzia would be delivered starting from 1 December, while details of this agreement are unclear.²⁸ Cheap gas was also reported to be delivered in Taraclia, Orhei and Balti.²⁹ The Minister of Energy once more opposed that this promise is not feasible.

²³ General Inspectorate of Police reported about new cases of vote-buying in [Balti](#) (related to the "Chance" party) and [Gagauzia](#). Several ENEMO interlocutors from political parties also alleged that attempts of vote buying continued between the two rounds.

²⁴ The President Maia Sandu held meetings with voters in [Calarasi](#), [Ungheni](#) and [Truseni](#) (the village in Chisinau municipality) where PAS candidates got into the second round. The Prime Minister [Dorin Recean](#) participated in PAS campaign activities in Floresti, Nisporeni, Soldanesti, and Ungheni. In Soldanesti, the Prime Minister promoted the "European Village" project, financed from public funds. The Prime Minister's FB page is a clear example of the concoction of the official posts of the Prime Minister with the campaign posts. The Minister of Infrastructure and Regional Development Andrei Spinu also actively [supported](#) PAS candidates in Balabanesti (Criuleni district) and Rezina while promoting the "European Village" project.

²⁵ The 1990 OSCE [Copenhagen Document](#) in Article (5.4) obliges the state to ensure a clear separation between the state and political parties; in particular, "*political parties will not be merged with the state*".

²⁶ As an example, on 17 November, Shor [posted](#) on FB that he was approached by the mayoral independent candidate in Comrat Nicolae Dudoglo with a request for financing infrastructural projects in Comrat.

²⁷ Press [briefing](#) of the Bashkan on 7 November. On 31 October, the Bashkan of Gagauzia, Eugenia Guțul, announced that the inhabitants of the Gagauzia will pay a preferential charge of 10 MDL per cubic meter of natural gas. for more, see the Statement of Preliminary Findings and Conclusions of ENEMO for the first round.

²⁸ According to the [statement](#), a Turkish company signed a contract with a large European trading company to buy gas directly from the European gas supply system. Two days later, the Minister of Energy Victor Parlicov said the contract published by the Bashkan of Gagauzia is false and cannot be implemented and it is a part of the promises done in the electoral campaign.

²⁹ The Bashkan of Gagauzia, the speaker of the Gagauz Assembly, the mayors of Taraclia and Orhei had a joint [press conference](#) in Chisinau on 15 November.

The Government of Moldova also continued to use financial incentives in the campaign which is at odds with international good practice.³⁰ On 8 November, the Ministry of Finance transferred to local public authorities' financial means in the amount of 822 mil. MDL (42.4 mil. EUR), including 344 mil. MDL (17.7 mil. EUR) for one-off payments for education workers as a part of the “Growth for Moldova” package.³¹ Both parliamentary and extra parliamentary opposition parties criticized all these incentives for distorting the fairness of the level playing field.

Campaign Finance

ENEMO raises concerns that many contestants did not properly follow the campaign finance rules and principles, which together with the late publication of the CEC campaign finance oversight reports limited the overall transparency of the process. Additionally, seemingly due to insufficient capacities and the financial reporting system not yet integrated with other systems, the CEC oversight seems rather superficial at this stage of the process.

The financial reports for the second round were due on 10 and 17 November. Many of them were again not delivered or not uploaded within the prescribed deadline, affecting the transparency and accountability of campaign finance reporting.³²

Positively, the CEC issued two additional reports about campaign finance oversight on 3 and 8 November including the aggregated data on party expenses per district and issued several warnings.³³ The 3 November report covered the period by 13 November, while the 8 November

³⁰ “In order to prevent the misuse of administrative resources to imbalance the level playing field during electoral competitions, the legal framework should state that no major announcements linked to or aimed at creating a favorable perception towards a given party or candidate should occur during campaigns” [Venice Commission and OSCE/ODIHR Joint Guidelines for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes](#), 2016, Guidelines B, Article 1.3.

³¹ The MFA [statement](#) from 8 November. On 5 October, the “Growth for Moldova” package was adopted by the Parliament totaling 1.65 billion MDL. The Government [announced](#) that the goal of this package is to finance development and infrastructure projects, salary increases for physicians as well as one-off payments to teachers, police officers, judges and other public servants, affecting in total around 170,000 citizens.. “In order to prevent the misuse of administrative resources to imbalance the level playing field during electoral competitions, the legal framework should state that no major announcements linked to or aimed at creating a favorable perception towards a given party or candidate should occur during campaigns” [Venice Commission and OSCE/ODIHR Joint Guidelines for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes](#), 2016, Guidelines B, Article 1.3.

³² The 10 November report uploaded by the CEC with one week delay was delivered by 17 out of 23 parties and by four out of 13 independent candidates. Only 12 out of 23 reports due on 17 November by political parties and three out of 13 by independent candidates were posted on the CEC website within the deadline. Four more reports were uploaded on 19 November.

³³ In its [Decision](#) No. 1541, the CEC informed that all previously warned contestants corrected their shortcomings. The CEC further warned 11 parties for using financial means without declaring them in advance to the CEC in the established manner. CEC discovered the exceeding of the donation ceiling in the case of ALDE, Change Party, CUB, PDCM, PLDM, Revival, and Ruslan Codreanu Bloc. The respective parties had to return the difference to the state budget within three days. Six parties were asked to submit corrected financial reports and 12 parties were cautioned to inform the CEC about the opening or non-opening of the “Electoral Fund”. The 8 November CEC [report](#) states that only three out of 12 previously warned parties about non-declared funds complied with the CEC order. The report mentioned that only one party (Revival) out of seven returned the exceeded donation to the state budget within the deadline. Fourteen parties were again warned for using financial means without declaring them in advance to the CEC.

report analyzed the following week until 20 November. Another report covering the period from 27 October was adopted by the CEC on 17 November, but it was not published before the second round, thus limiting public scrutiny and the possibility for voters to make an informed choice. Separately from the CEC finance oversight reports, the FASM and PSRM parties received a warning from the CEC.³⁴

Based on the CEC reports, ENEMO assesses that the capacities of campaign finance reporting of many parties (especially smaller ones) and independent candidates is rather limited. In various cases, contestants did not inform the CEC about the opening or not opening of an “Electoral Fund”³⁵, sent reports without appointing a treasurer beforehand, and the reports included various inconsistencies or lacked supporting documents. ENEMO also noticed that the majority of political parties reported zero value for volunteering activities despite the obvious involvement of volunteers, at least for some main political parties. Several interlocutors from political parties had previously reported to ENEMO that they found the requirement to report volunteer time in financial terms extremely burdensome. Those parties that reported expenditures for volunteering activities did not do so in a uniform way.

While ENEMO commends the publication of the CEC reports on campaign finance monitoring as an important mechanism to inform the public, the late publication of these reports, some three weeks after the reporting period, significantly lowered the benefit of these reports. Various contestants also did not respect the CEC decisions to correct shortcomings within the prescribed deadlines, and the only sanctions applied by the CEC were belated warnings. ENEMO deems that in case of repeated violations and non-respected deadlines, the CEC could have considered applying more dissuasive sanctions. Concerns remain regarding whether the CEC’s oversight was sufficiently comprehensive and thorough enough.³⁶

On 8 November, the CEC initiated a complex control mission regarding the financing of the electoral campaign of the “Chance” Party for the entire reporting period until its de-registration.³⁷ However, the “Chance” Party ignored the CEC's invitation for the 17 November meeting to be

The CEC discovered the exceeding of the donation ceiling in the case of Chance Party, Common Action - Civic Congress and PDCM. Twenty parties were asked to submit corrected financial reports within three days.

³⁴ The FASM party received a warning in the CEC [Decision](#) No. 1560 of 9 November for the use of financial means, other than from "Electoral fund" as well as the use of undeclared and unreflected material funds. The party was obliged to present by 11 November the final financial report. Furthermore, the CEC [decided](#) to warn PSRM on 17 November for distributing campaign material marked as “*Printed on own technical equipment*” which relates only to contestants without the “Electoral Fund” which is not the case of PSRM.

³⁵ As of 20 October, eight out of 36 political parties did not inform the CEC about the opening or non-opening of an “Electoral Fund”. The CEC warned five out of these eight parties, since they did not submit any financial report in addition.

³⁶ The prominent CSO Promo-LEX reported in their regular reports the high amounts of probable unreported expenditures by the contestants and these serious findings have never been reflected in the CEC reports.

³⁷ The CEC based its [Decision](#) No. 1550 of 8 November on 105 notifications that were received from SIS, police inspectorates and citizens all over the country in relation to the existence of signs of violation of the regulatory framework for the financing of the electoral campaign. Thus, the CEC will conduct the control mission by 17 January 2024 to confirm or reject the given suspicions.

informed about the control mission and to present the first set of requested documents.³⁸ Further steps to be undertaken by the CEC on this matter remain to be observed.

Media

Media Environment³⁹

As already emphasized in the first Preliminary Statement, ENEMO reiterates the challenges and complexities in Moldova's media landscape, including access to information, the impact of social media, misinformation battles, dissatisfaction with advertising disparities, and the role of political communication in shaping public opinion. The media landscape is characterized by a mix of oligarch-controlled outlets, independent and investigative media, and those aligned with political parties.

Many ENEMO interlocutors pointed out that the media narrative has been distinctly oriented towards political party dynamics and national security concerns, rather than focusing on human rights issues. In this polarized environment, the discourse surrounding the second round of elections continued to be dominated by discussions on party alignments, policy positions, and the broader geopolitical implications for Moldova. Human rights considerations, traditionally an integral aspect of democratic processes, have taken a backseat in media coverage and were overshadowed by scandals during the election, diverting attention from essential issues like women's representation, minority inclusion, and youth involvement. The media struggled to keep the focus on community needs amidst the clamor generated by controversies.

Traditional media

Media of public interest, including investigative and human rights-focused outlets, coexist with politically controlled and business-oriented media. Independent media endeavored to maintain integrity in reporting, scrutinizing both the government and opposition, but faced challenges in countering the influence of well-funded media outlets aligned with political figures.

Media outlets strived to cover candidates fairly, but challenges included candidates' non-cooperation and the need for fact-checking. A notable trend emerged with some candidates choosing to abstain from participating in debates. This decision by certain candidates influenced the dynamics of public discourse and engagement, potentially leading to a less informed electorate. The reasons behind candidates refusing to participate in debates vary, encompassing strategic considerations, concerns about the perceived impartiality of the debate platform, or broader political calculations. Most candidates chose alternative avenues to communicate their platforms, relying on social media, public appearances, or other forms of outreach, thereby bypassing the traditional debate format. According to some ENEMO interlocutors, on the local level, candidates

³⁸ The CEC [press release](#) of 17 November.

³⁹ The mission is not conducting traditional media monitoring activities. Findings and conclusions in this section are drawn from meetings with interlocutors that work on the media field in Moldova and monitoring of the activity of the body in charge of monitoring media conduct (Audiovisual Council). ENEMO is however monitoring some aspects of social media (see social media subsection, below).

who chose not to participate in debates often cited a lack of familiarity with the city and concerns about answering specific questions due to recent arrivals or returns to the city.

In some parts of the north region, according to ENEMO interlocutors, the overall media situation leans toward positivity, with notable strengths in media freedom, transparency, and collaboration with election bodies. In some parts of the south region however, and specifically in ATU Gagauzia, the issues of language representation, cautious debate strategies, and financial disputes impacting media access underscore the multifaceted nature of the media environment.

Additionally, challenges such as accusations of political bias continued to underscore the nuanced nature of media engagement in local politics. The reliance on international donors for funding emphasizes the need for diversified support mechanisms to ensure sustained media independence.

ENEMO notes that the Audiovisual Council (AVC) continued to operate with efficiency, transparency, and timeliness during the second round of elections, ensuring robust oversight in monitoring media activities. The Audiovisual Council (AVC) played a crucial role by publishing nine monitoring reports in total for the election period. In the last monitoring report covering November 6 to November 12, 2023⁴⁰, The Audiovisual Council (AVC) sanctioned four media service providers with 6 fines amounting to 55 000 lei⁴¹ and a public warning⁴² for violations related to deviations from election coverage, unilateral presentation of subjects or omission of key information and viewpoints, and not ensuring the balance of opinions.

Additionally, in the monitoring report covering November 4-5, 2023, during a period of electoral campaigning prohibition, the AVC identified ethical and technical breaches. Examples included the continuation of news broadcasts after midnight or in the morning on non-prime days. Despite these violations, there was no evidence of electoral campaigning in content related to non-political topics like capital and infrastructure.

Online and social media

The second round of elections continued to underscore the proliferation of media platforms, especially on social media, resulting in a diverse array of outlets with varying journalistic responsibility and ethical standards. This increased reliance on social media has introduced challenges, including disinformation campaigns, leading to the rapid spread of misleading narratives, false information, and propaganda.

The surge in informational attacks in Moldova, particularly during the second round of elections, indicates a heightened effort to manipulate public perception through the deliberate dissemination of false or misleading information. Concerns about these evolving dynamics include a noted shift to Telegram due to changes in Facebook's policy, raising apprehensions about the potential impact of manipulative information on that platform. The significant influence of TikTok, especially among the younger demographic, has increased, highlighting its role in shaping media trends and

⁴⁰ <https://consiliuaudiovizual.md/elections/alegeri-locale-generale-2023/>

⁴¹ Jurnal TV was fined with 25 000 lei, TVC 21 with 25 000, Vocea Basarabiei TV - with 5.000 lei.

⁴² N4 TV Channel.

contributing to information dissemination. While Facebook holds substantial influence, its profit-oriented nature allows the persistence of sponsored content, including hateful posts.

Furthermore, there was a surge of hate speech particularly on various social media platforms, illustrating instances where politicians employed inflammatory language, contributing to a heightened atmosphere of hostility, emphasizing the dangerous impact of hate messages on national security.

Additionally, ENEMO noted that President Maia Sandu continued to face a discrediting campaign on Facebook marked by negative narratives aimed at undermining her credibility. Facebook became a battleground for the dissemination of derogatory content and false information targeting Sandu, with narratives strategically crafted to tarnish her image and reputation. These efforts included misleading stories, inflammatory language, and the deliberate spread of misinformation, contributing to a hostile online environment.

ENEMO continued to observe in the Facebook ad library instances of pages not directly affiliated with any political party⁴³, actively engaging in third-party campaigning. During the period 08 November - 14 November 2023, the allocation of funds by these pages to endorse particular politicians or parties, or to destabilize the electoral process adds to the intricate web of political influence on social media. This occurrence emphasizes the involvement of external entities in molding public perception and endorsing political objectives via online platforms. Additionally, ENEMO observed example of paid political advertising of Телекомпания ВТВ - Balti, Бельцы sponsored by Our Party.⁴⁴ Regarding the paid ads on Facebook, when it comes to political actors, the party that spent most on paid ads is PAS - EUR 661, followed by PSDEM - EUR 443.

ENEMO used the CrowdTangle platform to monitor the activities of political parties/candidates on Facebook. ENEMO continued to monitor 21 pages of political parties/candidates⁴⁵ which used social networks and online space to spread political content. During the monitoring period, November 06 - November 18, 2023, as expected, there was a decrease in communication frequency by political parties. The total number of content, published by monitored pages on Facebook was 289 out of which individually: Partidul Schimbă 2 posts, PAS - 56, Partidul Liberal - 2, Carp Lilian - 3, Partidul Social - 27, MAN - 12, PCRM - 1, Blocul Electoral Ruslan Codreanu/Putea Oamenilor - 0, Partidul Nostru - 14, Partidul politic "Renastere" - 6, Partidul Politic Sansa - 31, Ion Ceban - 33, Platforma DA - 21, Vasile Costiuc - 15, Partidul Acasă Construiam Europa - 1, Democrația Acasă - 24, Ruslan Codreanu - 3, Victor Chironda - 7, Diana Caraman - 9, Partidul Liberal Democrat din Moldova - 10, Vasile Bolea - 12.

A total of 162.7 thousand Facebook interactions were made on the mentioned posts, out of which as much as 67.3 thousand on posts of Ion Ceban, 53.3 thousand on posts of the "Democrația

⁴³ Such as Moldova plină de surprize EUR 4,543, O nouă Moldova EUR 1,278, Plai Moldovenesc EUR 457, Вячеслав Платон: за свободную Молдову, EUR 510.

⁴⁴ In the amount of EUR 991.

⁴⁵ ENEMO monitored the same pages that were monitored during the first round of elections, regardless of the fact that some of the monitored pages did not represent active candidates (e.g., the Mayor of Chisinau, Ion Ceban, who was already elected in the first round. This methodological decision was made under the assumption that these political stakeholders influence public opinion and thus, the electoral process in any case, regardless of the fact that they might not be actively campaigning in the second round.

Acasă", and PAS 16.9 thousand. Parties/candidates communicated mostly through photos (52.08 percent), videos (24.31 percent), and Facebook live (17.71 percent).

Complaints and Appeals

The CEC maintains the public registry⁴⁶ of complaints, which currently documents 125 appeals. Appeals in the registry are accompanied by its corresponding decisions. Among these, 73 were lodged prior to Election Day, while the remaining 52 were submitted on Election Day or in the subsequent period. It is noteworthy that the documents submitted in the form of notifications or requests are not consistently published in the registry. The section where entry documents are published was last updated on October 30. Complaints and appeals filed with lower-level commissions and decisions remain unpublished, thus lacking public scrutiny in the election complaint handling process.

ENEMO observed that the complaint handling process was complex and required a high level of transparency. The fact that only appeals filed with the CEC are subject to publication online with respective decisions, and not notifications or requests, points to a lack of comprehensive public disclosure. The inconsistent publication of complaints and appeals filed with lower-level commissions is reason for concern.

On Election Day and the following period, the CEC received complaints/requests/notifications and appeals containing requests for vote recounts concerning various districts. As a result, 21 complaints were fully or partially satisfied and subsequently, recounts were conducted in 18 localities.

On 10 November, the CEC collectively adopted Decision no. 1575⁴⁷, addressing requests and appeals requesting recounts submitted between November 7 and 9, both electronically and in person at the CEC headquarters. This decision led to the rejection of 77 requests for being unsubstantiated. Many of the submitted documents lacked essential information like the complainant's signature or contact details. However, according to the CEC, the reasons for rejection included the absence of evidence supporting the need for a recount or the conclusion that a recount would not influence the results or mandate distribution. The CEC noted some errors in the voting records from the contested constituencies, attributing them to human error; errors that were not deemed significant enough to warrant a recount. Additionally, the CEC noted that many requests criticized the voting and electoral process in general terms, without providing concrete evidence to support their claims.⁴⁸

⁴⁶ Registry of appeals: <https://a.cec.md/ro/contestatii-depuse-la-comisia-electorala-centrala-15254.html>

⁴⁷ The CEC [decision](#) no. 1575 regarding some requests and appeals requesting the recount of votes, submitted to the CEC on November 7-9, 2023.

⁴⁸ The evidence that was submitted demonstrated corrected errors by electoral authorities, but these corrections were considered insufficient to impact the final voting results.

The above-mentioned decision was challenged in the Chisinau Court of Appeal, through nine separate appeals⁴⁹. However, the Chisinau Court of Appeal upheld the CEC decision. On November 18, on the eve of the second round of elections, the Supreme Court of Justice published seven judgments, through which the Court partially satisfied two appeals⁵⁰ and ordered recounts, while in five cases appeals were deemed inadmissible.

On November 14, the CEC decided⁵¹ on four more recount requests. According to the CEC decision, three of these were deemed inadmissible because they were filed after the prescribed deadline. The one request which was submitted within the legal timeframe was reviewed after the adjudication deadline. The decision was further appealed to the Chisinau Court of Appeal, which rejected the appeal.

The different forms of documents (notifications, requests, complaints/appeals) used to challenge the electoral process indicate a possible lack of understanding of procedural knowledge among participants, especially when the distinction between these is not explicitly clear. Additionally, a system with numerous submission formats puts a considerable administrative burden on electoral bodies. It requires them to process and respond to each type of submission according to the respective procedures, which can be resource intensive.

The appeal submitted by the political party “Chance” challenging decision no. 92 of the Commission of Exceptional Situations that led to the cancellation of the party’s registration from the electoral race, remained pending.⁵²

Timely legal remedy is a cornerstone of resolving electoral disputes according to international standards⁵³. The failure of the Chisinau Court of Appeal to respond promptly to the appeal related to candidate registration raises concerns about the effectiveness of the judicial system in handling election-related cases. Delays in the processing of such appeals can undermine the integrity of the dispute resolution process.

⁴⁹ Cases: no. 3-199/23; no. 3-201/23 2-23160814-02-3-131120223-1; no. 3-202/23 2-23160825-02-3-13112023; no. 3-203/23 2-23160838-02-3-13112023; no. 3-204/23 2-23160955-02-3-13112023; no. 3-205/23 2-23161085-02-3-131120231; no. 3-206/23; no. 3-208/23 2-23161397-02-3-13112023; no. 3-209/23 2-23161406-02-3-13112023.

⁵⁰ Cases no. [3ra-1114/23](#) and no. [3ra-1113/23](#).

⁵¹ The CEC [decision](#) no. 1581.

⁵² The Chisinau Court of Appeal did not issue a decision before election day started or concluded on November 5. During the court hearing, the representative of the Commission for Exceptional Situations raised the exception of the unconstitutionality of Article 225 para. 3 subparagraph „e“ from the Administrative Code. Through a Decision dated November 5, 2023, the Chisinau Court of Appeal admitted the request to lift the exception of unconstitutionality and sent the referral to the Constitutional Court, to resolve it. According to the Decision of the Constitutional Court, the referral regarding the unconstitutionality exception of Article 225 par. 3, subparagraph „e“ from the Administrative Code, raised by the representative of the Commission for Exceptional Situations is declared inadmissible. The [Constitutional Court made this decision on this matter on November 9](#). The Case is still pending at the Chisinau Court of Appeal.

⁵³ The [1990 OSCE Copenhagen Document](#) in Article (5.10) obliges the state to have an effective means of redress against administrative decisions so as to guarantee respect for fundamental rights and ensure legal integrity. The Venice Commission’s [Code of Good Practice in Electoral Matters](#) provides that “time-limits for lodging and deciding appeals must be short”. (three to five days for each at first instance). [..time limits for appeals must be very short and that the appeal body must make its ruling as quickly as possible.” II.3.3 (95).

Between 7 and 10 November, the political party “Chance” lodged a series of appeals with the CEC targeting 35 second level DEC⁵⁴. These appeals demanded the annulment of the decisions, which had previously dismissed requests to annul election results as inadmissible. The party demanded to overturn the DEC decisions and annul the election results in these constituencies.

The CEC addressed⁵⁵ these appeals and deemed them inadmissible, stating that the decisions or inactions of the DEC⁵⁵ should be brought before respective local courts within a prescribed deadline. Following the CEC's decision, these DEC decisions/inactions were then challenged in local courts and subsequently in appellate courts.

During the reporting period, several complaints were filed regarding the candidate registration within the EMBs and Courts. Besides, some of the candidates are under ongoing investigations. (See Candidate registration section).

Election Day

On Election Day for the mayoral runoffs, ENEMO observed at a limited number of polling stations to follow the processes of opening of polling stations, voting, counting, as well as transfer and intake of election materials by DEC⁵⁴. However, in accordance with ENEMO's practice for limited EOMs, the mission did not observe Election Day in a systematic or comprehensive manner. Observation teams observed the opening procedures at two polling stations, voting at 31 polling stations⁵⁶, and closing and counting at two polling stations. In addition, ENEMO observed the intake of election materials and tabulation of results at two level one DEC⁵⁴.

Election Day in the second rounds was generally calm and peaceful. At the limited number of polling stations observed by the mission, Election Day procedures were overall conducted efficiently and in accordance with the law. PEB members in visited polling stations were open and provided the requested information to ENEMO observers. The set up of most visited polling stations was suitable, with few exceptions. Sporadic minor procedural irregularities⁵⁷ did not negatively affect the result of the elections.

However, at a few polling stations observed, ENEMO observers reported instances of organized transportation of voters⁵⁸ and potential breaches of the secrecy of the vote⁵⁹. Most polling stations

⁵⁴ Out of 52 published appeals in the registry, [35 are concerning](#) the “Chance” party against the second level DEC⁵⁴.

⁵⁵ The CEC [decision](#) no. 1576.

⁵⁶ In Balti, Comrat, Cioc-Maidan, Besarabasca, Chirsova, and Svetlii.

⁵⁷ E.g., unsealed mobile ballot boxes, due to lack of requests for mobile voting, improperly placed cameras.

⁵⁸ In Chirsova and, to some extent, in Cioc-Maidan.

⁵⁹ In two polling stations observed, 36/4, Comrat and 36/45, Cioc-Maidan some voters did not fold the ballot papers properly, seemingly with the intention to reveal their vote.

visited by ENEMO observers on election day were not easily accessible to persons with locomotor disabilities.⁶⁰

Counting procedures at polling stations observed were properly followed by the PEB. Regarding intake of materials and tabulation of results, at the two DEC's observed procedures were followed and the process was efficient.

About ENEMO

The European Network of Election Monitoring Organizations (ENEMO) is an international nongovernmental organization that represents a network of national nongovernmental civic organizations founded on 29 September 2001, in Opatija, Croatia. It consists of 21 leading domestic monitoring organizations from 17 countries of Central and Eastern Europe and Central Asia, including two European Union countries.

ENEMO seeks to support the international community's interest in promoting democracy in the region by assessing electoral processes and the political environment and offering accurate and impartial observation reports. ENEMO's international observation missions use international benchmarks and standards for democratic elections to evaluate the electoral process and the host country's legal framework. ENEMO and all its member organizations have endorsed the 2005 Declaration of Principles for International Election Observation and the Declaration of Global Principles for Nonpartisan Election Observation and Monitoring by Citizen Organizations. Each ENEMO observer signed the Code of Conduct for International Election Observers. ENEMO member organizations have monitored more than 250 national elections and trained more than 250,000 observers.

To date, ENEMO has organized 39 international election observation missions to 11 countries: Serbia 2022, Presidential and Parliamentary Elections; Hungary 2022, Parliamentary Elections; Georgia 2021, Local Elections; Kosovo 2021, Local Elections; Albania 2021, Parliamentary Elections; Moldova 2021, Parliamentary Elections; Moldova 2020, Presidential Elections; Ukraine 2020, Local Elections; Montenegro 2020, Parliamentary Elections; Serbia 2020, Parliamentary Elections; Moldova 2019, Local Elections; Ukraine 2019, Early Parliamentary Elections; Ukraine 2019, Presidential Elections; Moldova 2019, Parliamentary Elections; Armenia 2018, Early Parliamentary Elections; Moldova 2016, Presidential Elections; Ukraine 2015, Local Elections; Ukraine 2014, Parliamentary Elections; Ukraine 2014, Presidential Elections; Ukraine 2013 – re-run of Parliamentary Elections 2012 in 5 DEC's; Kosovo 2013, Local Elections; Ukraine 2012, Parliamentary Elections; Kosovo 2011, Re – run of Parliamentary Elections; Kosovo 2010, Parliamentary Elections; Kyrgyzstan 2010, Parliamentary Elections; Ukraine 2010, Presidential Elections; Kosovo 2009, Local Elections; Moldova 2009, Parliamentary Elections; Georgia 2008, Presidential Elections; Kyrgyzstan 2007, Parliamentary Elections; Ukraine 2007, Parliamentary Elections; Ukraine 2006, Local Elections in Poltava, Kirovograd and Chernihiv; Ukraine 2006,

⁶⁰ In one of the visited polling stations, observers reported the absence of a voting booth dedicated to persons with disabilities.

Parliamentary Elections; Kazakhstan 2005, Presidential Elections; 30 Albania 2005, Parliamentary Elections; Kyrgyzstan 2005, Presidential Elections; Kyrgyzstan 2005, Parliamentary Elections; Ukraine 2004, Presidential Elections, second round rerun; Ukraine 2004, Presidential Elections;

ENEMO member organizations are: Center for Democratic Transition – CDT, Montenegro; Center for Civic Initiatives CCI, Bosnia and Herzegovina; Centre for Monitoring and Research – CeMI, Montenegro; Center for Free Elections and Democracy – CeSID, Serbia; Gong, Croatia; International Society for Fair Elections and Democracy – ISFED, Georgia; KRIIK Association, Albania; Citizens Association MOST, Macedonia; Promo- LEX, Moldova; OPORA, Ukraine; Society for Democratic Culture SDC, Albania; Transparency International Anti-Corruption Center (TIAC), Armenia; Election Monitoring and Democratic Studies Center (EMDS), Azerbaijan; Belarussian Helsinki Committee (BHC), Belarus; FSCI, Kazakhstan; Kosovo Democratic Institute (KDI), Kosovo; Coalition for Democracy and Civil Society, Kyrgyzstan; Center for Research, Transparency and Accountability (CRTA), Serbia; Obcianske OKO (OKO), Slovakia; Committee of Voters of Ukraine (CVU), Ukraine; Political Accountability Foundation (PAF), Poland.