



ENEMO International Election Observation Mission
General Local Elections 2019 in Moldova
Mayoral run-off contest, 3 November 2019

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS
5 November 2019

The second round for mayoral run-off elections was conducted in an overall efficient manner, mostly in line with Moldovan legislation and international standards. Lack of clear legal provisions for the second round and late regulations left a significant amount of uncertainties in the electoral process, and minor irregularities were observed on election day. However, none of the above seemed to negatively affect the legitimacy of the process or the results.

On 15 September 2019, the European Network of Election Monitoring Organizations (ENEMO) deployed an International Election Observation Mission (IEOM) to Moldova to observe the General Local Elections of 2019. After observing the first round and issuing an [Interim Report](#) on 13 October and the [Statement of Preliminary Findings and Conclusions](#) on the First Round, on 22 October, the IEOM stayed in the country to observe the mayoral run-off contest, which took place on 3 November. The Statement of Preliminary Findings and Conclusions follows the second [Interim Report](#), covering the week after the first round of elections and issued on 27 October 2019.

In addition to the 5 Core Team members based in Chisinau, ENEMO has accredited 8 Long term observers (LTOs) and deployed them in teams of two in Chisinau, Balti, Orhei, and Comrat on 26 September. The Mission is headed by Dritan Taulla.

Until 4 November ENEMO LTO teams conducted 612 meetings, 175 with election management bodies, 112 with political parties, 143 with candidates, 84 with state officials, 34 with media and

64 with domestic civil society organizations, in addition to observing 38 campaign activities (meetings or rallies).

The mission has been monitoring and assessing the overall political and electoral environment, respect for the rights to elect and stand for election, conduct of election management bodies, campaigning, gender equity, voting and tabulation processes, electoral dispute resolutions and other crucial aspects of the process, based on international standards for democratic elections and the Moldovan legal framework.

This Second Preliminary Statement is based on ENEMO observers' findings from the day after the first round election day (21 September) until the day after the second round election day (4 November). The Statement should be considered in conjunction with the Statement of Preliminary Findings and Conclusions on the first round, issued on 22 October. The Mission will stay in the country until the conclusion of the electoral process to follow post-election developments. A final report, including a full assessment, which will depend in part on the conduct of the remaining stages of the elections, detailed findings, and recommendations will be issued within sixty days from the certification of results.

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Preliminary conclusions

On 3 November 2019, a second round of elections was held in 384 localities throughout Moldova, to elect mayoral candidates that did not gather over half of the votes cast in the first round. The preliminary voter turnout for the second round as announced by the CEC was 40.34 percent. According to information from the CEC on preliminary results, out of 384 elected mayors in the second round, 335 represented political parties/blocs, and 49 mayors were elected as self-nominated candidates; 84 out of 384 elected mayors are women (21.9 percent). ENEMO notes that preliminary results were overall accepted by electoral contestants following election day, including through public statements by high state officials.

The legal framework provides conditions for holding democratic elections, as the conduct of the first round of elections has already demonstrated. However, the Electoral Code does not clearly regulate several aspects of the second round. Although the CEC undertook steps to regulate some of these aspects, some of them remained unregulated. ENEMO assesses that the lack of clarity in provisions leaves space for subjective and/or incoherent interpretation of the law by EMBs.

The CEC worked in a collegial manner, held regular public sessions and its decisions were overall published on its website in a timely manner, in line with the law. The Commission operated in accordance with its mandate, and its performance during the period between the first and second rounds was mostly efficient and overall transparent. However, ENEMO notes that some key election data were not readily available.

ENEMO notes that as a result of the amendments to the Instruction regarding voting rights in local elections, voters having changed their domicile or residence in between the two rounds, and unable to render themselves to their previous place of domicile or residence, were *de facto* disenfranchised and deprived of their right to participate in the second round at their new place of domicile or residence.

Despite the campaign unfolding in an overall free environment, concerns should be raised regarding multiple instances of “black PR” and negative campaigning targeted at candidates, especially on social media, in the form of hate speech, discreditation, and *ad hominem* verbal attacks, which sharply increased in the second round.

In spite of the attempts by the government to limit misuse of administrative resources, ENEMO notes the involvement of high state officials and MPs openly supporting mayoral candidates from their respective parties in the second round, during campaign events or on their social media pages. Although no explicit provisions regarding the above are contained in the Electoral Code, concerns should be raised regarding the blurring of line between the state and party, which is at odds with international standards and creates an unlevel playing field.

ENEMO reiterates concerns with regard to the lack of dissuasive sanctions at the disposal of the CEC, as well as to the lack of financial oversight of the content of financial reports of electoral contestants. No effective mechanisms are in place to verify campaign activities with reported expenses presented in the financial reports of parties and candidates, undermining the effectiveness of campaign finance oversight and leaving space for possible abuse by electoral contestants.

The CEC has kept a registry of complaints filed with them and made them publicly available online in full before the run-off Election Day, although the online registry was updated with significant delay for a number of complaints. ENEMO notes that timeframes or adjudicating complaints challenging the results of the first round overlap with the two weeks timeframe between the two rounds, which might present an obstacle to the right to appeal, at odds with international standards.

ENEMO assesses that the Audiovisual Council has failed to ensure efficient and effective supervision of the conduct of broadcasters throughout the electoral campaign, including the second round. Late, non-proportional and non-dissuasive sanctions and a lengthy process for examining monitoring reports have led to an inefficient monitoring mechanism. Moreover, failure to timely address complaints, combined with a low and non-adequate sample of broadcasters monitored, and apparent reluctance to enforce the legal framework and take appropriate measures, has contributed to further decrease the efficiency of the supervising role of the institution.

Election Day was, overall, calm and peaceful. The management of the polling process and conduct of PECs was assessed positively in the majority of observed polling stations, despite isolated cases of campaigning in the vicinity of polling stations, a few malfunctions in SAIS-E (State Automated Information System “Elections”), instances of violations of the secrecy of the vote, lack of transparency at a few polling stations and DEC’s observed, and other minor incidents not affecting the overall legitimacy of the process or results.

In general, the performance of PEB members was positively assessed on Election Day. However, as in the first round, ENEMO observers noted that recent amendments including the requirement of video-cameras’ installation was inconsistently implemented by PEB members during voting. At a considerable number of polling stations observed, ENEMO observers noted that PEBs were not following the Regulation and that the video cameras were being used and recording during the voting process, positioned towards ballot boxes.

I. Background

On 23 October, the Central Election Commission (CEC) announced the final results of the first round of elections. 514 mayors were elected in the first round, having gathered a simple majority of the votes cast. On 3 November 2019, a second round was held in 384 localities throughout the country, to elect mayoral candidates which did not gather over half of the votes in the first round. As in the first round, elections did not take place in Transdniestria, currently not under the control of Moldovan constitutional authorities, nor the municipality of Bender.

According to data from the CEC, out of the total of 768 mayoral candidates on the ballot in the second round, 589 (76.69 percent) were men and 179 (23.31 percent) were women; 683 (88.93 percent) represented a political party while 85 (11.07 percent) were competing as independents¹. The three parties with the highest number of candidates were the Socialist Party (PSRM), the Democratic Party (PDM), and the electoral bloc ACUM.

The preliminary voter turnout for the second round, as announced by the CEC, was 40,34 percent. According to information from the CEC on preliminary results, out of 384 elected mayors, 335 represent political parties/blocs and 49 mayors were elected as self-nominated candidates in the second round².

ENEMO notes that preliminary results were overall accepted by electoral contestants following election day, including through public statements by high state officials. According to the law, the final results of the elections are validated by the courts.

II. Legal Framework and Electoral System

The Electoral Code does not clearly regulate several aspects of the mayoral run-off contests³, including active suffrage rights for citizens who reach the voting age, or change residence in-between the two rounds, timeframes for campaigning, rules for campaign finance, etc. Moreover, timeframes for challenging the results of the first round of elections are inadequately regulated and leave space for complaints to remain pending on the second round Election Day⁴.

The CEC undertook steps to regulate some of the aspects which are not clearly regulated in the law, such as voting rights for persons who change residence, or reach voting age between the two

¹ https://a.cec.md/ro/cec-prezinta-profilul-candidatilor-la-functia-de-primar-in-2781_94884.html

² https://a.cec.md/ro/comisia-electoral-centrala-a-prezentat-rezultatele-preliminare-ale-turului-2781_94894.html

³ Articles in the Electoral Code directly regulating aspects of the second round for the election of mayors are limited to the following: Art. 145, para. 2 which sets forth that in case no mayoral candidate receives a majority of the votes on Election Day a second round of elections shall be organized in two weeks; Art. 145., para. 3, which sets forth that local elections in the second round are valid regardless of turnout.; Art. 26, para. 1(o) regarding the role of the CEC in organizing the second round of elections; and Art. 65, para. 5 which provides that the accreditation of observers for the first round is valid also for the second round.

⁴ See the Complaints and Appeals Section.

rounds⁵ and mobile voting for the second round, however, other aspects remained unregulated⁶. ENEMO assesses that the lack of clarity in provisions leaves space for subjective and/or incoherent interpretation of the law by EMBs. Despite the above-mentioned shortcomings, ENEMO assesses that the legal framework provides conditions for holding democratic elections, as the conduct of the first round of elections has already demonstrated.

The run-off mayoral contest was held to elect mayors in 384 localities, where no candidate received an absolute majority of the votes in the first round, held on 20 October⁷. While at least 25 percent of eligible voters in a given constituency needed to participate for elections to be valid in the first round, no minimum turnout was required for the run-off election.

III. Election Administration

The election administration consists of four levels: the Central Election Commission (CEC), First and Second Level District or Municipal Election Commissions⁸ (DECs / MECs), and Precinct Election Bureaus (PEBs). The EMBs⁹, in general, efficiently and timely administered the operational aspects of elections.

Central Electoral Commission (CEC)

The CEC worked in a collegial manner, held regular public sessions and its decisions were overall published on its website in a timely manner, in line with the law. The Commission operated in accordance with its mandate, and its performance during the period between the first and second rounds was mostly efficient¹⁰ and overall transparent.

However, ENEMO notes that some key election data were not readily available. Some information was not proactively posted on the official website, and at times, the CEC was not able to provide this information even upon request.

Throughout the period of the second round, the CEC held seven sessions in a transparent manner and open to observers, media and the public. CEC sessions continued to be streamed online. On the day of the run-off, the CEC provided four updates on the conduct of voting to the media and public¹¹.

⁵ See the Registration of Voters Section.

⁶ See the Campaign Section and the Campaign Finance section.

⁷ According to data from the CEC, run-off elections were to be held in 384 administrative territorial units.

⁸ The Second level EMBs for the municipalities of Chisinau and Balti are called Municipal Election Commissions.

⁹ The law stipulates safeguards to ensure plurality of the commissions' membership.

¹⁰ However, the CEC failed to address the regulation on counting, namely the 2015 instructions regarding the procedure of recounting the ballots.

¹¹ The official website: <https://pv.cec.md> aggregated live updates, connected to the SAIS-E, sub-module "Voting".

The CEC and Center for Continuous Electoral Training (CCET) produced several new voter education videos aired on their social media platforms¹². The CCET maintained a free hotline for voters' inquiries, and on the eve of the second round the number of telephone operators was significantly increased. However, a considerably higher number of telephone calls using the hotline were made by SAISE-E operators and electoral commission members rather than voters¹³.

An innovative project on identifying voters through barcode readers was tested during the second round of the Chisinau mayoral elections. The pilot was implemented at 70 polling stations in the capital city. It proved its efficiency by significantly reducing the time required to identify voters and processing in SAIS-E.

Stakeholders confirmed an overall confidence in the operation of SAIS-E which was additionally tested on the eve of the second round election day. Operational sessions included testing the system sub-modules "Opening", "Voting" and "Counting" and revealed no technical or organizational difficulties.

On 29 October the CEC announced that opinion exit-polls are to be conducted during the run-off for the mayoral elections, and accredited 164 operators from two polling companies¹⁴. The exit polls were carried out in 67 polling stations in Chisinau municipality, and the results were made public after the closing of polling stations.

District Electoral Commissions (Level I and Level II DEC)s

DECs were responsible for managing the electoral process in the relevant constituency¹⁵, aggregating election results, and receiving, reviewing and taking decisions on some election related complaints and appeals. In general, DECs managed the process efficiently and, overall, in line with the requirements of the law.

However, ENEMO observers noted that the conduct of the DECs was at times inconsistent, and not all DECs posted their decisions on time on the CEC website. Many decisions from DECs remained unpublished until the end of the period of observation¹⁶. Concerns should be raised regarding the level of transparency of the process of electoral dispute resolution at the DEC level¹⁷.

¹² Videos aired on various TV channels were in the state and Russian languages, supported by sign language interpretation, and sometimes with subtitles in Russian language. They included information on voters' rights, voting procedures, and electoral offences.

¹³ According to the CEC, a number of telephone inquiries from DEC/PEB members and SAIS-E operators on Election Day exceeded three times the number of requests from voters.

¹⁴ Sociological Research and Marketing Company "FOP-STAR" and Institute for Marketing and Surveys "IMAS INVENT". The research was carried out in cooperation with the Political Consulting Company "POLIEXPERT".

¹⁵ For the second round, the rules of composition of mid-level and lower level electoral commissions remain the same as for the first one.

¹⁶ No improvement between the first and second rounds was observed on this point.

¹⁷ See Complaints and Appeals section.

Almost all DEC's visited by ENEMO observers were located in local government / municipal buildings. ENEMO interlocutors voiced concerns that senior officials of local administration served in the leading positions at a number of DEC's, putting at risk public confidence in the impartiality of the EMBs.

Precinct Electoral Bureaus (PEBs)

ENEMO observers reported that a few replacements of DEC/PEB members occurred throughout the period between the two rounds. The law does not provide for any legal deadline after which replacements of EMB members are no longer allowed, which should not be considered as a good practice.

According to the CEC, on 3 November voting was conducted in 1,042 PEBs¹⁸. While most ENEMO interlocutors raised some concerns regarding the training of lower-level election commissions¹⁹; newly appointed members in fact did not undergo training, although this did not seem to negatively affect the process overall. In general, the performance of PEB members was satisfactory on Election Day, especially during the voting and counting processes.

PEBs visited informed ENEMO observers that they had received adequate support and materials from relevant public authorities to conduct the preparation for the elections. However, lack of invitations for the second round of elections was noticed, which could be considered as an issue for notifying first-time voters.

Ballot papers were available in the state and Russian²⁰ languages. On 29 October, the CEC disclosed²¹ the number of ballots produced in Russian language: 407,568 out of 1,696,664 (in Chisinau – 223, 942 out of 635,921) and later distributed them to PEBs, two days before election day, in line with legal deadlines.

IV. Registration of Voters

Less than a month before the first round of elections, the CEC issued an Instruction confirming the use of the main and supplementary voter lists from the first round²², and indicating that voters who became eligible to vote (reached 18 years) between the two rounds had the right to vote in the second round. However, in order to prevent possible artificial voter migration²³, and to address

¹⁸ https://a.cec.md/ro/astazi-3-noiembrie-in-republica-moldova-se-desfasoara-turul-2781_94890.html

¹⁹ ENEMO EOM notes that no trainings were conducted by the CCET in-between the first and second round, contrary to concerns from PEB members which were frequently mentioned to observers.

²⁰ The Constitution establishes Russian as a language of communication between nationalities.

²¹ https://a.cec.md/ro/pentru-al-doilea-tur-al-alegerilor-locale-generale-din-2781_94872.html

²² Instruction for particularities to exercise a right to vote on the local elections was adopted on 27 September 2019 (no. 2734),

²³ This was expressed publicly by CEC members during the CEC session on 28 October.

concerns voiced by domestic observers, six days prior to the second round election day, the CEC issued another decision modifying this Instruction.

The modified Instruction added provisions regarding voters who changed their domicile or residence in between the two rounds, as well as provisions regarding voters that requested using the mobile ballot box in the first round, and wished to vote at the polling station for the second round. The Instruction clarified that voters having changed domicile or residence in between the two rounds should vote at their previous place of domicile or residence, at the same polling station, and that requests from voters for using mobile voting in the first round remained in force, unless they waived such right by informing the respective PEB.

ENEMO raises concerns that changes to the instructions late in the election process and close to the date of the second round election day risks creating uncertainty in their application. While this late decision did not result in uneven practices implemented by PEBs on 3 November, ENEMO notes that such precipitated changes are not good practice for ensuring legal certainty and uniform application of the law.

Additionally, voters having changed their domicile or residence in between the two rounds²⁴, and unable to render themselves to their previous place of domicile or residence, were *de facto* disenfranchised and deprived of their right to participate in the second round at their new place of domicile or residence, in contradiction to international standards and best practices²⁵.

Also, by requiring voters to vote at a place where they are no longer domiciled/residents, the Regulation adopted by the CEC requiring voters to vote at their previous domicile violated Article 134 paragraph 2 of the Electoral Code which states: “*Voters who are not residents of the respective administrative-territorial unit may not participate in the elections of the local council and mayor*”. Thus, according to the law, voters who are no longer domiciled at the place where they voted in the first round should not be required to vote at a place where they no longer reside for the second round (since they changed domicile, they are not residents of that administrative territorial unit).

While understanding the reasons of the CEC’s reactive efforts to stifle attempts at artificial migration of voters, ENEMO raises concerns that the repercussions of this decision, in addition to

²⁴ ENEMO is aware of the ambiguity of the terms “residence” and “domicile”. However, for the purpose of clarity, the notion of “residing” in a particular place, regardless of whether residence or domicile, is used in this paragraph.

²⁵ See 1966 ICCPR, Art. 25: “Every citizen shall have the right and the opportunity, without any of the distinctions mentioned in article 2 and without unreasonable restrictions: (a) To take part in the conduct of public affairs, directly or through freely chosen representatives; (b) To vote and to be elected at genuine periodic elections which shall be by universal and equal suffrage and shall be held by secret ballot, guaranteeing the free expression of the will of the electors; Office of the High Commission for Human Rights, General Comment No. 25: “The right to participate in public affairs, voting rights and the right of equal access to public service (Art. 25)”, par. 11: “*States must take effective measures to ensure that all persons entitled to vote are able to exercise that right. Where registration of voters is required, it should be facilitated and obstacles to such registration should not be imposed. If residence requirements apply to registration, they must be reasonable [...]*”; and the 2009 Council of Europe’s “Additional Protocol to the European Charter of Local Self-Government on the right to participate in the affairs of a local authority”, Art. 1, points 1-2: “*1. The States Parties shall secure to everyone within their jurisdiction the right to participate in the affairs of a local authority; 2. The right to participate in the affairs of a local authority denotes the right to seek to determine or to influence the exercise of a local authority’s powers and responsibilities.*” and point 4.1: “*4.1 Each Party [State] shall recognize by law the right of nationals of the party [state] to participate, as voters or candidates, in the election of members of the council or assembly of the local authority in which they reside.*”

leaving significant discretion to the Commission regarding voting rights, limited the possibility of some voters to participate in the second round.

V. Electoral Campaign and Campaign Finance

Electoral Campaign

ENEMO notes the lack of specific timeframes for second round candidates to start campaigning provided for in the Electoral Code. Therefore it remains unclear whether mayoral candidates were allowed to resume campaigning immediately following the first election day, or whether they were required to wait until the official announcement of a second round. In addition to lack of clarity, this also created a lack of a level playing field, advantaging candidates which resumed campaigning immediately, as opposed to those who waited until the announcement of the second round on 23 October.

Electoral contestants mainly used banners, leaflets and newspapers in terms of campaign materials, and mainly meetings with voters, door-to-door campaigns, and in some cases rallies and concerts as campaign activities. A considerable amount of campaigning was conducted on social media platforms in addition to organized TV debates. With regard to the visibility of political parties and their affiliated candidates' campaigns, the Socialist Party (PSRM), ACUM bloc, and Democratic Party (PDM) (and their respective candidates) were the most visible throughout the country, having a higher number of candidates. Polarization within the governing coalition, especially in Chisinau, shaped campaigning rhetoric on infrastructure, city planning, real estate market regulation, and social issues.

The campaign environment was overall assessed as calm and low-key²⁶ by observers, with mayoral candidates generally able to campaign freely. However, according to ENEMO interlocutors, allegations of pressure on some candidates were voiced, as well as cases of incidents reported to the police, which included telephone intimidation against candidates²⁷, one case of verbal attack by religious figures against a candidate²⁸, and in one case vandalizing of a party office²⁹.

Additionally, ENEMO observers reported on multiple instances of “black PR” and negative campaigning targeted at candidates, especially through social media, in the form of hate speech, discreditation, and *ad hominem* verbal attacks, which sharply increased in the second round, especially as election day approached. The most prominent cases were related to candidates

²⁶ However, the two main contestants in the capital were visible in media, either via TV debates or individual interviews, especially during the week leading to election day.

²⁷ E.g. in Chimislia, Cupcui, and Taraclia.

²⁸ In Singerei.

²⁹ In Bolduresti.

running for the Chisinau municipality, although other instances were reported by observers throughout the country. Despite the campaign unfolding in an overall free environment, concerns should be raised regarding any form of discreditation, which contradict both political rights and international standards³⁰.

Few official complaints were filed regarding vote buying (reportedly, mostly due to the lack of evidence), and in isolated cases formal complaints were addressed to police and/or the CEC regarding misuse of administrative resources. ENEMO notes however that allegations of former mayors using municipality premises and equipment were ongoing for the second round, and were seldom the object of official formal complaints. Observers were also informed about allegations of distribution of money and goods and, in one instance, directly observed distribution of alimentary goods³¹ to voters.

The efforts of the government, in the form of statements, a working group and an action plan to provide solutions to the issue of misuse of administrative resources during the electoral period should be praised³². However, in the framework of these elections, ENEMO deems that insufficient guidelines specifically targeted at incumbent mayors and mayoral candidates and lack of sanctions applied, considerably undermined these efforts.

In spite of the attempts by the government to limit misuse of administrative resources, ENEMO notes the involvement of high state officials openly supporting mayoral candidates from their respective parties in the second round, during campaign events or on their social media pages³³. Additionally, several instances of involvement of MPs campaigning in favor of mayoral candidates were reported by observers³⁴.

Although no explicit provisions regarding the above are contained in the Electoral Code, concerns should be raised regarding the blurring of line between the state and party (as well as between incumbent officials and candidates running for election), which is at odds with international standards³⁵ and creates an unlevel playing field.

³⁰ 1966 ICCPR Art. 17: “1. No one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence, nor to unlawful attacks on his honor and reputation. 2. Everyone has the right to the protection of the law against such interference or attacks.”

³¹ According to observers, distribution of potatoes in Causeni was directly observed. Elderly people and persons with disabilities received vouchers for food in the city hall. According to ENEMO interlocutors however, these potatoes weren’t documented in any way, and there was no council decision about them. When asked about the case, the police answered observers that this was a “legal distribution of potatoes”.

³² However, although the information was provided upon request, ENEMO notes that the action plan and information about the working group were not posted publicly online.

³³ 2016 Venice Commission “Joint Guidelines for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes”: the OSCE/ODIHR has defined “abuse of state resources” (terminology used as well by other international institutions) as the “*undue advantage obtained by certain parties or candidates, through the use of their official positions or connections to governmental institutions, in order to influence the outcome of elections*” (par. I, point 11.).

³⁴ E.g. in Anenii Noi, Sanatauca, Comrat, Bessarabesca, Taraclia, Cismichioi, Vulcanesti, Cantemir, Balti and several settlements in the district of Orhei.

³⁵ 1990 Copenhagen Document, Par. 5.4 states that there should be: “*a clear separation between the State and political parties; in particular, political parties will not be merged with the State.*” ; 2002 Venice Commission Code of Good Practice in Electoral Matters, Par. 2.3. a.: “*Equality of opportunity must be guaranteed for parties and candidates alike. This implies a neutral attitude*

Campaign Finance

While general campaign finance regulations and provisions of the law apply to the second round, there are no specific legal requirements for reporting on campaign finances for the mayoral runoff³⁶.

Most political parties with candidates running in the second round of elections have submitted financial reports regarding their electoral funds in time and in line with legal requirements. However, ENEMO notes that three political parties did not fully reflect expenses in line with the template provided for by the CEC, in the first week following the holding of the first round.

All parties with candidates in the second round submitted their financial reports by the legal deadline (1 November), which were posted in time by the CEC for voters to consult³⁷. The six parties with the highest amount of reported campaign expenses were Socialist Party (PSRM), Our Party, "Shor" Party, Liberal Democratic Party of Moldova, Democratic Party of Moldova (PDM), and ACUM bloc³⁸.

Nonetheless, the reporting template provided to electoral contestants by the CEC for reporting on expenses from their electoral funds is not detailed enough to provide a comprehensive picture of the level of spending on specific items (such as advertising on social networks, for instance). ENEMO deems that the lack of more detailed financial reports creates an unlevel playing field and increases the risk of "shadow funding" of electoral campaigns.

The CEC mobilized efforts to coordinate with other state institutions such as the State Tax Service and National House of Social Insurance, to verify the origin of the sources of funding from electoral funds of contestants (namely donations of individual donors who did not declare any income and did not receive any social benefits for 2016-2019). Background checks on legal entities and whether or not they were engaged in public procurement contracts over the past three years were also coordinated with the Public Procurement Agency³⁹.

ENEMO commends these efforts as a positive step towards preventing illicit donations. However, concerns should be raised regarding the timing of requests communicated by the CEC to the Prosecutor General, in between the two rounds of elections, for further investigation of individuals that donated funds to political parties. Such investigations, regardless of their result, contain the risk of negatively affecting the image of some parties, thus potentially politically influencing the electoral campaign and affecting the will of voters.

by state authorities, in particular with regard to: i. the election campaign; ii. coverage by the media, in particular by the publicly owned media; iii. public funding of parties and campaigns."; Par. 3.1, a.: "State authorities must observe their duty of neutrality." and c.: "Sanctions must be imposed in the case of breaches of duty of neutrality and voters' freedom to form an opinion."

³⁶ For instance, it is unclear whether total donation amounts to electoral funds of contestants concern both rounds, or are reset after each round.

³⁷ Reports were published in a timely manner by the CEC on the day following their obtention, in accordance with Art. 43 par.4 of the Electoral Code.

³⁸ <https://a.cec.md/ro/sustinerea-financiara-a-concurentilor-electorali-6172.html>

³⁹ https://a.cec.md/ro/cu-privire-la-rapoartele-concurentilor-electorali-privind-mijloacele-banesti-acu-2751_94851.html

ENEMO reiterates concerns with regard to the lack of dissuasive sanctions at the disposal of the CEC, as well as to the lack of financial oversight of the content of financial reports of electoral contestants. No effective mechanisms are in place to verify campaign activities with reported expenses presented in the financial reports of parties and candidates, undermining the effectiveness of campaign finance oversight and leaving space for possible abuse by electoral contestants.

VI. Complaints and Appeals

Election results are validated by courts under whose authority the relevant administrative - territorial unit falls. ENEMO notes that the timeframes for adjudicating complaints that challenge the results of the first round of elections overlaps with the two-weeks timeframe between the two rounds⁴⁰, which might present an obstacle to the right to appeal, at odds with international standards⁴¹.

The IEOM is aware of complaints challenging the results of the first round, including recounting requests, in some 37 constituencies (for a total of 39 contests)⁴². In most cases (23) the recount was requested for the mayoral contest, in thirteen cases the results for the local councils were challenged, and in three cases the results for the district council. According to the CEC, the courts have granted eight recounts, and in no case the recount changed the results of the first round. The CEC has kept a registry of complaints filed with them and made them publicly available online in full before the run-off Election Day, although the online registry was updated with significant delay for a number of complaints⁴³. Between the first and second round of elections the CEC has received nine complaints, bringing the total number of complaints received by them to 51. The CEC has addressed six of the nine received complaints, in all cases declaring non-competence and directing complainants to the relevant body⁴⁴.

In between the two rounds the CEC has ruled on three complaints, all of them filed before the first round election day. All three complaints regarded breach of campaign finance rules and were rejected. ENEMO assess that, although the three complaints were not subject to legal provisions

⁴⁰ The deadline for DEC(s) to tabulate results in the respective constituency is 48 hours after the closing of polling stations (Article 64, para. 2 of the Electoral Code); the deadline for DEC(s) to submit the tabulated results to the respective court is five days after the results are tabulated and protocols signed (Art. 146, para. 1 of the Electoral Code and para. 72 of the CEC Regulation for the activity of DEC(s), the deadline for courts to validate the results is ten days after receiving the protocols from the DEC(s) (Art. 146, para. 2 of the Electoral Code). Moreover, if first instance decisions taken on the deadline are challenged in courts of appeals and Supreme Court, this adds 8 more days maximum (Art. 74, paras. 6 and 7 of the Electoral Code). Thus, if DEC(s) and different instance courts avail of the whole duration of time set out in the law, the results of the first round might be finally invalidated up to 25 days after the first round Election Day, while a second round shall be held within two weeks from it.

⁴¹ Paragraph 5.10 of the 1990 Copenhagen Document.

⁴² Until Saturday, 2 November, the CEC had information on only 30 constituencies in which results were challenged. Two withdrew

⁴³ The CEC updated the online registry of complaints filed with this body, the update of which had stopped since 3 October (see the Statement of Preliminary Findings and Conclusions for the first round and the Second Interim Report), on the eve of Election Day.

⁴⁴ In two of the cases, the complainants addressed the CEC challenging the results of the first round and requesting recounts.

that require their resolution before Election Day⁴⁵, postponing election related complaints after election day is a practice that should be avoided as, by the law, potential sanctions for violation of campaign finance rules include deregistration of contestants⁴⁶.

The EOM has been informed of some 47 complaints filed with lower level election management bodies and courts between the two rounds, including recount requests. In line with findings from the first round, the IEOM has again noticed a number of complaints filed with non-competent bodies (e.g. recount requests filed with DEC's and the CEC), which hints at a poor understanding of contestants about the complaints and appeals procedures.

VII. Media

Media coverage for the second round varied, with the elections in the capital receiving most of the media attention, including national media⁴⁷. Contestants continued to widely use social media during the second round. Dissemination of black PR for candidates on social media was observed by the IEOM⁴⁸, increasing in intensity as election day approached. Media monitoring reports of domestic organization have found biased coverage of the campaign, especially in the form of mentioning the candidates in negative context.

The Audiovisual Council has examined the monitoring reports for the last ten days of the first-round campaign on 31 October⁴⁹. Based on the findings, the Council has sanctioned all four TV broadcasters monitored, two of them for failing to ensure balanced information to the public⁵⁰, one for failing to provide impartial information and for not providing sign language interpretation for persons with hearing impairment⁵¹, and one for not providing sign language interpretation for persons with hearing impairment⁵². The applied sanctions were similar in nature, regardless of the type of violation. Besides monitoring reports, the Audiovisual Council has examined two complaints, both of which were dismissed. Although the first complaint was filed on 11 October, nine days before the first round election day, it was examined only after it (on 21 October), in

⁴⁵ Art. 71, para. 6 of the Electoral Code.

⁴⁶ Article 75, para. 2(e) of the Electoral Code.

⁴⁷ The mayoral candidates in the capital appeared in several debates or one to one interviews in various TV stations throughout the campaigning period for the second round, especially in the week leading to election day.

⁴⁸ In particular, several Facebook pages, some of which anonymously managed, that were actively publishing denigrating or mocking materials targeting specific candidates, were noticed. A relatively high number of the posts in these pages were paid to reach a larger audience, which also raises concerns about financial resources used and hiding of funds used for campaigning. The Electoral Code does not contain provisions on political financing and campaigning in relation to social platforms.

⁴⁹ The Audiovisual Council has informed the IEOM that it would continue the monitoring of the six broadcasters observed since the start of the first round and issue a single report on their conduct for the whole duration between the two rounds.

⁵⁰ Moldova-1 TV was sanctioned with 10.000 lei (approx. 520 Euro) and Moldova-2 with a public warning.

⁵¹ Prime TV was sanctioned with a public warning.

⁵² Canal 2 TV was sanctioned with a public warning.

violation of the Electoral Code⁵³, and dismissed on grounds of campaigning already being over in the relevant municipality, as no second round was held there⁵⁴.

Following a complaint filed by a domestic organization with the Court of Appeals of Chisinau and followed up in the Supreme Court of Justice, the latter has, on 30 November, issued a decision obliging the Audiovisual Council to accept a complaint filed previously by this organization with the Council and review newscasts of seven TV stations⁵⁵ for the period 23 September - 6 October⁵⁶.

ENEMO assesses that the Audiovisual Council has failed to ensure efficient and effective supervision of the conduct of broadcasters throughout the electoral campaign, including the second round. Late, non-proportional and non-dissuasive sanctions and a lengthy process for examining monitoring reports have led to an inefficient monitoring mechanism. Moreover, failure to timely address complaints, combined with a low and non-adequate sample of broadcasters monitored, and apparent reluctance to enforce the legal framework and take appropriate measures, has contributed to further decrease of efficiency of the supervising role of this institution.

VIII. Gender representation

According to data from the CEC, out of the total of 768 mayoral candidates for the second round, 589 (76.69 percent) were men and 179 (23.31 percent) were women. According to the preliminary results⁵⁷ in the second round out of total 384 elected mayors 84 are women (21.9 percent).

Regarding PEB membership, as in the first round women constituted the majority in most polling stations visited by ENEMO observers throughout Election Day. Women were also in majority in leadership positions in the observed PEBs, and women chairperson⁵⁸, deputy chairperson⁵⁹ and secretary⁶⁰ were prevailing.

⁵³ Article 73, para. 3 of the Electoral Code sets out that complaints against the election campaign coverage by broadcasters shall be considered by the Audiovisual Council within five days, but no later than Election Day.

⁵⁴ The complaint was filed against BTV Moldova, by the mayoral candidate from PSRM in that municipality. No second round was held in Balti as the mayor was elected in the first round.

⁵⁵ RTR Moldova, Accent TV, Publika TV, Channel 2, Channel 3, Prime TV, and NTV Moldova from September 23 - October 6, 2019 and inform about the results of the control.

⁵⁶ Based on findings from their monitoring reports, on two occasions (9 October and 15 October) the domestic organization Community for Advocacy and Public Policies “WatchDog.md” addressed the Audiovisual Council, requesting that the institution examines the coverage of the campaign by seven TV stations, providing as evidence of biased coverage in their monitoring reports, containing detailed findings. The Council answered to the organization by mentioning that some of the broadcasters were sanctioned based on ex officio actions from the Council, but has not issued an official decision, considering their complaint not as an official complaint, but as a recommendation. Watchdog.md appealed to the Court of Appeals of Chisinau, which rejected the appeal. The decision of the Court of Appeals was appealed at the Supreme Court, which overturned the decision of the Court of Appeals and obliged the Audiovisual Council to examine the newscasts of the broadcasters in the time period indicated in the complaint and inform on the findings.

⁵⁷ [Central Electoral Commission](#)

⁵⁸ Around 77 percent.

⁵⁹ Around 77 percent.

⁶⁰ Around 94 percent.

Following the trend of the first round, no specific messages targeting specifically women policies were used during the campaign.

IX. Inclusion of minorities and persons with disabilities

While all CEC decisions are published in the state language, translation into Russian is also provided, but not in a timely manner (sometimes with delays of up to 10 days).

Ballot papers are printed in state language and Russian⁶¹. Regarding voter education in minority languages, the CEC published videos in Russian, Ukrainian, Gagauz, and Roma languages.

Around 68 percent of the polling stations visited by ENEMO observers on Election Day lacked adequate structures that would facilitate access of persons with mobility impairments to the PS. However, ENEMO observers were informed by PEBs that in 70 percent of the visited polling stations, magnifying glasses for voters with slight visual impairment were available. In addition, in two polling stations were noticed sign language interpreters.

X. Election Day

On Election Day, ENEMO deployed five multinational teams of observers to follow the opening, voting, counting, transfer and intake of election materials by DEC. Observation teams, composed of 10 observers, observed the opening procedures in 4 polling stations, voting in 69 polling stations, and closing and counting in 4 polling stations. In addition, ENEMO observed the tabulation and election materials intake in 4 Level I DEC.

Election Day was, overall, calm and peaceful. The management of the polling process and conduct of PECs was assessed positively in the majority of observed polling stations, despite isolated cases of campaigning in the vicinity of polling stations, malfunctions in SAIS-E, violation of the secrecy of the vote, and lack of transparency at a few polling stations and DEC observed, and other minor incidents not affecting the overall legitimacy of the process or results.

Opening

ENEMO observed the opening procedures in four polling stations. The environment around polling stations was assessed as calm and without incident in all observed polling stations.

⁶¹ For the second round of General local elections, the CEC printed 1,696,664 ballots, of which 1,289,076 in Romanian and 407,568 in Russian. For the position of Chisinau Mayor, the CEC printed 635 921 ballots, of which 411 979 in Romanian and 223 942 in Russian.

Preparations for the opening started between 6:15 AM and 6:45 AM in observed polling stations, with all observed polling stations opening on time (07:00 AM) and in the presence of all PEB members of the respective polling station. All observed polling stations were equipped with all essential materials needed for voting at the moment of opening⁶². However, in one polling station observed, the PEB had received less ballots than the number of voters on the list.

The procedure of sealing stationary and mobile ballot boxes was followed properly in all observed polling stations, as was the procedure of filling out the opening protocols. However, at one polling station observed, the PEB camera was functioning and positioned adequately, but was not recording the opening process (in violation of the CEC Regulation⁶³). The PEB turned on video recording at 7:00 and, according to observers, intended to record the voting process during the whole day (also in violation of the CEC Regulation)⁶⁴.

The arrangement of the premises of polling stations was assessed as suitable and ENEMO observers were able to properly monitor the opening procedures in all observed polling stations. However, three out of four polling stations observed were accessible to persons with disabilities but required minor assistance, while one polling station was assessed as not accessible.

In all four observed polling stations, no presence of unauthorized persons in the premises while the opening procedures were being carried out was noticed by observers. No complaints related to the opening were filed in any of the polling stations observed.

PEB members conducted opening procedures generally in order and following requirements in all observed polling stations. Opening procedures were overall assessed positively in all four observed polling stations (“very good” in two and “good” in two).

Voting

ENEMO observers monitored the environment around polling stations and the voting process in 69 polling stations during Election Day.

The environment around polling stations was assessed as orderly in 64 observed polling stations. However, observers reported on one case of campaigning near the polling station entrance. In two cases, individuals were stationed in front of the polling station, monitoring the arrival of voters,

⁶² Ballot papers, voting booths, ballot boxes, PEB stamp, protocol, voter lists, seals, and different stamps needed for the voting, invalidation of unused ballot papers, etc.

⁶³ CEC [Regulation on the functioning of the video recording equipment in polling stations.](#)

⁶⁴ In addition, at the same PEB, the SAISE system was not functioning due to internet shortage at the moment the polling station was opened and remained nonfunctional until the observers’ team left the polling station. Reportedly, the SAIS-E started to work properly 55 minutes after the opening (at 7:55 AM).

and in two cases observers were informed about allegations of vote buying (one of which involved transportation of voters)⁶⁵.

In most observed polling stations, all PEB members were present at the moment of observation, and in all cases observed PEBs were operating with at least the minimum number of PEB members required by the law. Women were well represented at PEBs observed, including in management positions: 76,8 percent of PEB Chairpersons, 76,8 percent Deputy Chairpersons, and 94,2 percent of Secretaries at observed polling stations were women.

Polling station set up was positively assessed by observers in 96 percent of observed polling stations and assessed as unacceptable in 4 percent of observed polling stations. In 99 percent of observed polling stations, stationary ballot boxes were properly sealed and placed according to procedures. Regarding mobile ballot boxes, observers reported they were properly sealed in 90 percent of cases, while in 10 percent mobile ballot boxes were not observed due to them either being used (and thus located outside of polling stations at the time), or no requests were made for mobile voting at the respective polling station.

Essential materials for the conduct of voting were present in all observed polling stations. At 65 polling stations observed, PEBs had received a number of ballots equal to the number of voters on the main list. However, in 4 polling stations observed, the number of ballots received by PEBs was inferior to the number of voters on the main list.

Voter identification procedures were followed properly in all observed polling stations. In 94,2 percent of observed polling stations, SAIS-E was functioning properly during the process of voting. In three cases at polling stations observed, SAIS-E operators faced some minor technical issues which were properly managed and did not affect the integrity of the process, and in one case SAIS-E operators faced more serious technical issues (due to Internet shortage).

In 67 observed polling stations, the secrecy of voting was respected. In one observed polling station however, more than one person in a voting booth was reported by observers, and in another case, one commission member was sitting behind the booths (although this seemed to be due to negligence rather than fraud).

All observed polling stations were assessed as being managed properly and PEBs functioning in an orderly manner. In 97 percent of observed polling stations, no formal complaints had been submitted during the opening or voting process. In 3 percent of observed polling stations, PEBs had received substantial formal complaints. In these two polling stations, complaints were filed about campaigning in the vicinity of the polling station, and in one case a complaint was filed regarding an observer from a political party disrupting the voting process.

⁶⁵ In one case, observers noticed voters being distributed alimentary goods free of charge at a shop in the vicinity of the polling station. Based on further inquiry by observers, the IEOM has strong suspicions that these goods free of charge were used as a means for bribing of voters.

In 68 observed polling stations, no serious violations were witnessed. In one polling station observed, there was a case of voters in the list not being allowed to vote. In 67 polling stations observed, no presence of unauthorized individuals was observed⁶⁶.

Polling stations were deemed by observers as easily accessible for persons with disabilities in 32 percent of observed polling stations, while access required minor assistance in 45 percent of observed polling stations. At 23 percent of observed polling stations, access for persons with disabilities was assessed as not suitable.

Authorized observers were able to properly observe in all polling stations observed. Voting procedures were positively assessed in all observed polling stations (either “very good” - 58 percent or “good” - 41 percent). In one case, the evaluation of the PEB received a negative evaluation (and was assessed as “bad”), although this was mostly due to negligence rather than fraud.

However, as in the first round, ENEMO observers noted that recent amendments including the requirement of video-cameras’ installation was inconsistently implemented by PEB members during voting. According to the Regulation⁶⁷, cameras should have been used only during the preparatory meeting (for checking their functioning) and at the end of the day during counting. At 26 percent of polling stations observed, ENEMO observers noted that PEBs were not following the Regulation and that the video cameras were being used and were recording during the voting process, positioned towards ballot boxes. ENEMO raises concerns regarding the fact that PEBs seemed unaware of the Regulation, which resulted in a lack of uniformed and consistent implementation.

Counting process

ENEMO followed the closing and vote-counting procedures in four polling stations. All observed polling stations closed in time, and no voters’ queues were reported in any of the polling stations at the moment of closing. All PEBs at observed polling stations were operating with enough members, as stipulated by the law.

The PEB indicated that voting was closed in SAIS-E (closing of the “voting” sub-module in SAIS-E by the operator) in all polling stations observed, and in all cases switched on the video camera when the counting process started, in line with the CEC Regulation. Video cameras were functioning and were properly positioned according to the regulation in three observed polling stations. In one case however, the camera was functioning properly, but commission members

⁶⁶ In two polling stations observed however, the presence of a security guard inside the polling station was noticed.

⁶⁷ Decision from 17 October 2019 for amending the Regulation on operation Video recording system in polling stations approved by decision CEC no. 2265 of 8 February 2019.

were standing in front of it and obstructing the recording of the counting process (although this was assessed by observers as being due to negligence rather than fraud).

At all polling stations observed during counting, counting procedures were followed properly and protocols were filled out in accordance with the law. In one polling station, there was one ballot cast more than the system registered. This, however, did not influence the result and was due to negligence rather than a fraudulent attempt according to observers.

No presence of unauthorized persons was noticed in the observed polling stations. All observers present were able to observe, and copies of protocols were handed to observers upon request and posted at polling stations immediately in all polling stations observed. No formal complaints had been submitted at polling stations observed during the counting process.

At all polling stations observed, all election materials were packed and sealed in accordance with the law. The evaluation of PEBs during counting was either “very good” or “good” in all observed polling stations.

Transfer of materials to district election commissions (Level I DEC) and DEC activity

ENEMO observers monitored the transfer of election materials and respective intake at 4 Level I DEC. The transfer of materials was done in an orderly manner and following the procedures in all polling stations in which ENEMO observed this process.

Observers assessed that DEC observed were acting transparently and straightforwardly in three observed DEC. One DEC observed however, observers were deliberately restricted to properly monitor the activity of the DEC⁶⁸.

Observed DEC did not receive any formal complaints. However, in one DEC observed, long lines of persons were noted, although moving about the DEC was not restricted by this.

In all cases, premises of observed DEC were assessed as adequate and with proper setup for the delivery of election materials. Three out of four DEC work was assessed as positive by ENEMO observers (“very good”), and one DEC’s work was assessed negatively (“bad”).

⁶⁸ In the case of the negatively assessed DEC (DEC 27/001), according to observers, the commission refused to disclose information about complaints, refused to answer observers’ questions regarding tabulation of results and number of ballots (including regarding possible mismatches and missing ballots), and a former mayor running for election (who was reelected) arrived at the premises of the DEC to celebrate his victory with food and drinks. A majority of commission members rushed to congratulate him.

XI. Observers

No specific provisions for accrediting additional observers for the second round are provided for in the Electoral Code, although the Code does set out that accreditations issued for the first round are valid also for the second. Thus, accreditation of international and citizen observers was extended for the second round by default. Political parties and candidates which were not contesting in the run-off were eligible to have representatives and observers at polling stations, as their accreditations were still valid.

Additionally, the CEC accredited 164 pollsters to conduct exit polls⁶⁹. In accordance with the Regulation, these individuals had the right to be outside in the vicinity of polling stations but not within.

In addition to domestic observers accredited from the first round (1,494 domestic observers had previously been accredited from 14 organizations), two organizations accredited an additional 62 observers⁷⁰, bringing the total number of domestic observers to 1,556. 144 international observers from the first round remained accredited to observe the second round of elections.

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 September 29, 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 240,000 observers.

To date, ENEMO has organized 30 international election observation missions to eight countries: Moldova 2019, Local Elections; Ukraine 2019, Early Parliamentary Elections; Ukraine 2019, Presidential Elections; Moldova 2018-19, Parliamentary Elections; Armenia 2018, Early

⁶⁹ CEC Decision dated 29 October

⁷⁰ NGO "MIRAD" (55 observers) and NGO "ADEPT" (7 observers).

Parliamentary Elections; Moldova 2016, Presidential Elections; Ukraine 2015, Regular 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, first round; Ukraine 2012, Parliamentary elections; Kosovo 2011, Re – run of Parliamentary elections; Kosovo 2010, Parliamentary elections; Kyrgyzstan 2010, Parliamentary elections; Ukraine 2010, Presidential elections, second round; Ukraine 2010, Presidential elections, first round; 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, Parliamentary elections; Kazakhstan 2005, Presidential elections; Albania 2005, Parliamentary elections; Kyrgyzstan 2005, Presidential elections; Kyrgyzstan 2005, Parliamentary elections; Ukraine 2004, Presidential elections, second round re-run; Ukraine 2004, Presidential elections.

ENEMO member organizations are: *Center for Civic Initiatives CCI, Bosnia and Herzegovina; Center for Democratic Transition – CDT, Montenegro; Centre for Monitoring and Research – CeMI, Montenegro; Center for Free Elections and Democracy – CeSID, Serbia; In Defense of Voters' Rights 'GOLOS', Russia; 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.*

The English version of this Statement is the only official document. An unofficial translation is available in Romanian.

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