

**Evaluation Report No. 14 of 17 November 2025
on Grigore CLEVADI, prosecutor in the Anti-Corruption Prosecutor's Office,
subject of evaluation under Law No. 252/2023**

Evaluation Panel B ("the Panel") of the Prosecutor Vetting Commission ("the Commission") established by Law No. 252/2023 on the external evaluation of judges and prosecutors and amending some normative acts ("Law No. 252/2023"), discharging the powers under the same Law, deliberated in private on 17 October 2025 and approved this report on 17 November 2025.

The members participating in the approval of the evaluation report were:

Panel B

Virginia MORARU – Panel's Chair

Cornel LEBEDINSCHI

Irmantas MIKELIONIS

Based on its work in collecting and reviewing the information, as well as the explanations provided in the public hearing and subsequent deliberations, the Panel B prepared the following evaluation report.

I. Introduction

1. This report concerns the subject of evaluation Grigore CLEVADI, Prosecutor in the Anti-Corruption Prosecutor's Office.
2. The Panel evaluated the subject of evaluation ("the subject") according to the procedure and criteria regulated by Law No. 252/2023, and according to the Rules of Procedure of the Prosecutor Vetting Commission ("the Commission Rules") approved by the Commission pursuant to art. 5 para. (4) of Law No. 252/2023.
3. The Panel unanimously concluded that Grigore CLEVADI meets the ethical and financial integrity criteria identified in Law No. 252/2023.

II. Subject of the Evaluation

4. The subject was appointed as interim prosecutor in the Hîncești Prosecutor's Office on 11 December 2008. On 20 April 2010 he was appointed as prosecutor in the same Prosecutor's Office, where he acted till June 2021. Started on 21 June 2021 till now, the subject works as prosecutor in the Anti-Corruption Prosecutor's Office.

III. Evaluation Criteria

5. Under art. 11 para. (1) of Law No. 252/2023, the Commission evaluates the subject's ethical and financial integrity.
6. Art. 11 para. (2) of Law No. 252/2023 provides that a subject is deemed not to meet the requirements of ethical integrity if the Commission has determined that:
 - a) over the last 5 years, the subject has seriously violated the rules of ethics and professional conduct of judges or, as the case may be, of prosecutors, as well as if the subject acted arbitrarily or issued arbitrary acts, over the last 10 years, contrary to the imperative rules of law, and the European Court of Human Rights has established, before the adoption of the act, that a similar decision was contrary to the European Convention on Human Rights.
 - b) over the last 10 years, the subject has admitted in his/her activity incompatibilities and conflicts of interest that affect the position held.
7. Art. 11 para. (3) of Law No. 252/2023 provides that the subject shall be deemed not to meet the criterion of financial integrity if the Commission has serious doubts determined by the fact that:
 - a) the difference between assets, expenses, and income, for the last 12 years, exceeds 20 average salaries per economy, in the amount as set by the Government for the year 2023.
 - b) over the last 10 years, the subject admitted tax irregularities as a result of which the amount of unpaid tax exceeded, in total, 5 average salaries per economy, in the amount as set by the Government for the year 2023.
8. The average salary per economy for 2023 was 11,700 MDL.¹ Thus, the threshold of 20 average salaries is 234,000 MDL, and the threshold of five average salaries is 58,500 MDL.
9. Art. 11 para. (4) of Law No. 252/2023 allows the Commission to verify various things in evaluating the subject's financial integrity, including payment of taxes, compliance with the legal regime for declaring assets and personal interests, the sources of funds of the subject's wealth.
10. Art. 11 para. (5) of Law No. 252/2023 provides that in evaluating compliance with the criteria set out in para. (3) of this article, the Commission shall also take into account the wealth, expenses, and income of close persons, as defined in Law No. 133/2016 on the declaration of assets and personal interests, as well as of the persons referred to in art. 33 paras. (4) and (5) of Law No 132/2016 on the National Integrity Authority.

¹ Government decision No. 936/2022 on the approval of the amount of the average monthly salary per economy, forecast for 2023.

11. Art. 11 para. (6) of Law No. 252/2023 provides that in assessing compliance with the criteria set out in art. 11 paras. (2) and (3), the legal provisions in force when the relevant acts occurred are applied. The documents or findings of other entities with competence in the areas concerned shall have no predetermined value for the Commission. Findings in final judgments shall be taken into account by the Commission, except for judgments that the Commission considers to be arbitrary or manifestly unreasonable. The Commission may rule only on breaches of the rules of ethics and professional conduct, without ruling on the legality of the decisions in question.
12. In applying art. 11 para. (3) of Law No. 252/2023, the Commission cannot apply the term “serious doubts” without considering the accompanying phrase “determined by the fact that”. This phrase suggests that the Commission must identify as a “fact” that the specified conduct has occurred.
13. Regarding the standard of “serious doubts” in the context of the vetting exercise, the Constitutional Court noted with reference to its previous decisions that the definition of standards of proof inevitably involves using flexible texts. The Court also said that the Superior Council of Prosecutors can only decide not to promote a subject if the report examined contains “confirming evidence” regarding the non-compliance with the integrity criteria. The word “confirms” suggests a certainty that the subject does not meet the legal criteria. Thus, comparing the wording “serious doubts” with the text “confirming evidence”, the Court considered that the former implies a high probability, without rising to the level of certainty (Constitutional Court Judgement No. 2 of 16 January 2025, §§ 99, 101).
14. The Commission notes that the Venice Commission underlined that in “a system of prior integrity checks, the decision not to recruit a subject can be justified in case of mere doubt, on the basis of a risk assessment. However, the decision to negatively assess a current post holder should be linked to an indication of impropriety, for instance inexplicable wealth, even if it cannot be proven beyond doubt that this wealth does come from illegal sources” (Opinion No. 1064/2021 of 20 June 2022, CDL-AD (2022)011-e, para. 10; Joint Opinion of 14 March 2023, CDL-AD(2023)005, para. 69).
15. Shifting the burden of proof to the subject, once the evaluating body has identified integrity issues, has been found permissible by the European Court of Human Rights (“ECtHR”), even in the vetting of sitting judges who may lose their positions or otherwise be sanctioned as a consequence of the evaluation. In *Xhoxhaj v. Albania*, no. 15227/19, 31 May 2021, § 352, the Court stated that “it is not per se arbitrary, for the purposes of the ‘civil’ limb of Article 6 § 1 of the Convention, that the burden of proof shifted onto the applicant in the vetting proceedings after the IQC [Independent Qualification Commission] had made available the preliminary findings resulting from the conclusion of the investigation and had given access to the evidence in the case file” (confirmed for the vetting of prosecutors in *Sevdari v. Albania*, no. 40662/19, 13 December 2022, § 130).
16. Once the Commission establishes substantiated doubts based on particular facts that could

lead to failure of evaluation, the subject will be afforded the opportunity to oppose those findings and to submit arguments in defense, as provided by art. 16 para. (1) of Law No. 252/2023. After weighing all the evidence and information gathered during the proceedings, the Commission makes its determination.

IV. Evaluation Procedure

17. Grigore CLEVADI was on the list of subjects submitted by the Superior Council of Prosecutors (“SCP”) to the Commission on 23 May 2024 for evaluation, pursuant to art. 12 para. (1) of Law No. 252/2023.
18. The subject holds the position prosecutor in the Anti-Corruption Prosecutor’s Office and was evaluated based on provisions of art. 3 para. (1) lit. e) and para. (3) of Law No. 252/2023.
19. On 24 May 2024 the Commission notified the subject of its initiation of evaluation and requested that he completes and returns the declaration of assets and personal interests for the last five years (“five-year declaration”), which includes the list of close persons in the judiciary, prosecution and public service, and an ethics questionnaire within 20 days, as provided in art. 25 para. (3) of the Commission Rules, consistent with art. 12 para. (4) of Law No. 252/2023. The subject returned the completed five-year declaration and ethics questionnaire within the deadline, on 12 June 2024.
20. Pursuant to art. 15 para. (2) of Law No. 252/2023 and art. 17 of the Commission Rules, the file in this matter was randomly assigned to Panel B.
21. On 16 August 2024, the Commission notified by email the subject that his evaluation file had been randomly assigned to Panel B with members: Virginia MORARU (Panel’s Chair), Cornel LEBEDINSCHI and Irmantas MIKELIONIS. The subject was informed that he may request, in writing and at the earliest possible time, the recusal of members from their evaluation. The subject did not request the recusal of members.
22. Because the law sets different evaluation periods for the ethical and financial integrity criteria cited above, the Panel evaluated compliance with these criteria over the past five, 10 and 12 years, respectively. Due to the end-of-the-year availability of the tax declarations and declarations on assets and personal interests, the evaluation under financial integrity criteria included the periods of 2012 - 2023 and 2014 - 2023. The evaluation period for the ethical integrity criteria includes the past five or 10 years calculated as per art. 24 para. (3) lit. b) of the Commission Rules.
23. During the last 12 years of the evaluation period, the subject was required to file declarations, both under Law No. 133/2016 on the declaration of assets and personal interests (“Law No. 133/2016”), and under the previous Law No. 1264/2002 on the declaration and control of income and property of persons with public dignity positions, judges, prosecutors, civil servants and some persons with managing positions (“Law No. 1264/2002”).

24. As part of the evaluation of the ethical and financial integrity of the subjects, the Commission obtained information from numerous sources. The sources generally included the General Prosecutors Office (“GPO”), specialized Prosecutors Offices, Superior Council of Prosecutors (“SCP”), National Integrity Authority (“NIA”), National Anticorruption Center (“NAC”), Office for Prevention and Fight Against Money Laundering (“AML”), Ministry of Internal Affairs (“MIA”), Customs Service (“CS”), State Tax Service (“STS”), General Inspectorate of Border Police (“Border Police”), the National Office of Social Insurance (“CNAS”), Public Services Agency (“PSA”), Governmental Agent within the Ministry of Justice, banks, financial institutions etc. Information was also sought, and where applicable obtained, from other public and private entities, as well as open sources, such as social media and investigative journalism reports. No complaints or information was received from members of civil society. All information received was carefully screened for accuracy and relevance.
25. To the extent that issues were raised from the subject’s five-year declaration, and ethics questionnaire and collected information, those issues were raised in written questions with the subject.
26. On 29 April 2025, the Panel asked the subject to provide additional information by 8 May 2025 to clarify certain matters (hereinafter the “first round of questions”). The subject provided answers and documents within the set deadline - on 8 May 2025. On 12 May the subject sent additional information from Customs Service and Preschool European Education Center.
27. On 7 August 2025, the Panel asked the subject to provide additional information by 15 August 2025 to clarify certain matters (hereinafter the “second round of questions”). The subject provided answers and documents within the set deadline - on 15 August 2025.
28. On 8 September 2025, the Panel asked the subject to provide additional information by 15 September 2025 to clarify certain matters (hereinafter the “third round of questions”). The subject provided answers and documents within the set deadline - on 15 September 2025.
29. On 6 October 2025, the Panel notified the subject that it had not identified in its evaluation any areas of doubt about the subject’s compliance with the ethical and financial integrity criteria and invited the subject to attend a hearing on 17 October 2025. The subject was informed that he could request access to the evaluation materials.
30. Following the subject’s request, on 10 October 2025 the subject was granted access to the evaluation materials according to art. 16 para. (5) lit. c) of Law No. 252/2023.
31. On 17 October 2025, the subject took part in a public hearing of the Panel.
32. At the hearing, the subject reaffirmed the accuracy of his answers in the five-year declaration and ethics questionnaire and stated that he did not have any corrections or additions to the answers he had previously provided to the Panel’s requests for information.

V. Analysis

33. This section discusses the relevant facts and reasons for the Panel's conclusion.
34. Based on the information it collected, the Panel did not find any issues that raised doubts as to the subject's compliance with the ethical and financial integrity criteria as per art. 11 of Law No. 252/2023. The subject clarified all questions the Panel had within the rounds of written questions.

Issues that raised certain doubts during the evaluation but were either mitigated or do not lead to failure under the thresholds set by Law No. 252/2023:

Issue 1. Difference between the assets, expenses and income (unjustified wealth) in the total amount of 147,930 MDL for the years 2014, 2015, 2018 and 2019 years in the evaluated period.

35. The Annex of the Commission Rules sets forth the formula for calculating unjustified wealth. As per art. 3 para. (1) of the of the Annex to the Commission Rules, a period is defined first for each calculation; the fiscal year is the default period.
36. Based on the available information, the Panel calculated the income and expenses of the subject and his family for the evaluation period and established a negative balance for years 2014, 2015, 2018 and 2019 amounting to 147,930 MDL, which is below the threshold of 234,000 MDL under art. 11 para. (3) lit. a) of Law No. 252/2023.
37. **Inexplicable wealth for 2014.** According to information available to the Panel, the total net income of the subject's household for 2014 amounted to 321,171 MDL whereas total expenditures amounted to 370,830 MDL. Thus, the total outgoing financial flow exceeded incoming financial flows by 49,659 MDL.
38. The subject's household incoming financial flows in 2014 calendar year included the next source of income: (1) the subject's net salary from the Prosecutor's Office in amount of 69,127 MDL, according to the information from the STS database; (2) childcare allowance in amount of 4,778 MDL based on the subject's 2014 annual declaration of income and property ("annual declaration") submitted to National Integrity Council ("NIC") on 16 February 2015; (3) bank savings carried over from 2013 in amount of 13,179 MDL as it was identified in the bank account no. 40XXX420 of S.A. Banca de Economii; (4) cash savings² at the end of 2013 – beginning of 2014, in amount of 14,000 EUR³ (equivalent to 234,087 MDL).

² According to the European Court of Human Rights, savings (both cash and bank savings) have a dual nature: at the beginning of the year, they are considered to be the inflow of funds; and at the end of the year, they are considered to be the outflow of funds. The outflow of savings at the end of the previous period is equal to the inflow of savings at the beginning of the following period. *See for details Xhoxhak v. Albania, No. 15227/19, 9 February 2021, § 31.*

³ All currency conversions are made at the National Bank of Moldova average exchange rate for the year in

39. In the written communication with the Panel regarding the cash savings at the end of the each year of the evaluation period (2012 - 2023), the subject informed the Panel in reply to the first round of questions (R1 - Q4), that he does not possess exact data regarding the remaining cash balance at the end of each calendar year and has mentioned the amount of 20,000 – 23,000 EUR at the end of 2011, received as income from his wedding event, and the amount of 5,000 – 7,000 EUR at the end of 2012, received from christening event. Also, in his reply in the same (R1 - Q4) he mentioned as general response “*I had cash equivalent to 25,000 -30,000 EUR*”, without of any details. He also noted “*I obtained the amount indicated from the wedding held on 17 September 2011, and my son’s christening in 2012. At present, I cannot say what the outstanding balance of the aforementioned amount was in subsequent years, as I was not required to declare it annually.*”
40. In the second round of questions (R2 - Q3) the Panel asked again about the cash savings at the end of each year, to ensure a correct and objective evaluation under financial criteria. The subject mentioned that he had at the end of 2013 cash savings of 14,000 EUR, explaining that „*Funds obtained from the wedding, christening, and birth of the child.*” He also reiterated that “*the indicated amounts are approximate and based solely on memory*”.
41. In reply to the third round of questions (R3 - Q1) the subject noted the Panel that he cannot agree with the inclusion of 234,087 MDL in the revenues, since this sum represents the equivalent of 14,000 EUR available in cash at the beginning of 2014. He argued that, according to the average exchange rate of the National Bank of Moldova (“NBM”) for 2014 (1 EUR = 18.6305 MDL), the correct amount should be 260,827 MDL. The subject further explained that in 2014 he entered with cash available in EUR, not in MDL, and therefore, once this amount was integrated into the income and expenses for 2014, it should have been converted at the exchange rate applicable to 2014, and not, as indicated by the Panel, at the 2013 rate. Moreover, he referred to the Commission’s own methodology, which specifies that all currency conversions are carried out at the average exchange rate of the NBM for the year in question. Based on this reasoning, he concluded that the total income for 2014 was 343,133 MDL.
42. The Panel, however, cannot accept this argument, as the subject had already possessed these funds in 2013, and therefore the equivalent in MDL established by NBM must be reflected at the exchange rate applicable to 2013, the year in which the funds were declared.
43. It follows that for the calendar year 2014, the subject’s family’s income was 321,171 MDL.
44. The subject’s household outgoing financial flows in 2014 included the next expenses: (1) purchase and import from Germany of the Toyota Avensis car (m./y. 2007), r./no. CSF223, in amount of 98,385 MDL, according to the subject 2014 annual declaration submitted to NIC on 16 February 2015, and subject’s answer in written communication (R1 - Q13). The Panel notes that according to the Customs Service database, this vehicle has been imported by the subject, evaluated by customs office at 60,000 MDL and has calculated import duties

in amount 28,754 MDL (total of 88,754 MDL). The Panel took into account the price declared by subject.

45. The outgoing financial flow includes (2) payments to Unica Sport fitness center of 350 MDL per month, as informed in written communication by subject (R2 - Q7), for 2013 - 2015. The Panel has calculated a total of 4,200 MDL, per year, and paid for 2014.
46. In round three of written questions (R3 - Q1), the subject disputed the amount of 4,200 MDL, paid to Unica Sport Fitness Center, and claimed that it should be reduced in half due to the fact that his wife did not attend the gym the entire year (no card payments were identified). The Panel notes the subject did not provide any proof in this regard. Furthermore, accepting or rejecting the reduction does not fundamentally alter the negative balance and does not affect the financial situation of the subject's family. Thus, the Panel took into account the amount of 4,200 MDL based on his initial reply in R2 – Q7.
47. The outgoing financial flow includes (4) cash savings of 10,000 EUR at the end of 2014, according to subject's answer in written communication (R2 - Q3). According to the Commission's Rules this sum is considered in the outgoing cash-flow for 2014, being converted into MDL at the NBM exchange rate for 2014, resulting thus in 186,305 MDL. Also, based on the analysis of the bank accounts held by the subject and his wife, the Panel identified (5) bank savings at the end of the year in amount of 5,476 MDL.
48. The Panel has included in the outgoing financial flow (6) the family Consumption Expenditure for Population ("CEP") to quantify expenses for his household, which included two adults and one child, in urban area, in amount of 76,464 MDL. The subject informed the Panel written communication (R3 - Q1) that the CEP for his family shall be reduced based on for the reason that, when calculating it, the coefficients for the urban area were used, but subject lived in 2014 with his parents in Ciorescu commune, Chişinău municipality and also, his wife could spend months in a row in the in-laws' house in Bender municipality.
49. The Panel analyzed the subject's explanations regarding the CEP and concluded that there are no sufficient justified grounds to reduce the CEP for the subject's household, based on the following reasons:
 - CEP is a statistical estimate, and the personal circumstances may vary, but deviations from CEP are usually accepted only with proof of significantly different living conditions.
 - CEP is a statistical method that balances individual expense categories among themselves, resulting in a fair estimation applicable to an average individual, i.e. it already takes into account the presence and number of children in a household.
 - The Panel took into consideration that, according to the information available from Acces-Web database, the subject's spouse had the residency at the address Chişinău municipality, A.I. Street, ap. N, between 8 October 2011 and 15 October

2016. According to e-Cadaster, this apartment had been purchased by the subject on 18 July 2007. The Panel notes that the subject had another residency in the period of 7 March 2007 and 21 April 2021: Ciorescu commune, Chişinău municipality. Also, the Panel notes that in 2014 the subject and his spouse were raising a baby together (born on 9 September 2012) and it appears highly unlikely that the subject resided with his parents while his spouse and child lived separately at her parents in Bender. The subject did not provide any proof in support of his claims, and the Panel cannot accept this argument.

50. It follows that for the calendar year 2014 the subject's family's financial outgoing flow was 370,830 MDL.

51. Considering all the above, the total negative difference between wealth, expenses and income (*unjustified wealth*) in 2014 was in amount of 49,659 MDL.

Table 1. Income and expenses table for calendar year 2014

Incoming financial flows (MDL)		Outgoing financial flows (MDL)	
Description	Amount	Description	Amount
Salary from the Prosecutor's Office	69,127	Gym membership fee	4,200
Cash savings carried over from 2013	234,087	Purchase and import of TOYOTA AVENSIS car, m./y. 2007	98,385
Bank savings carried over from 2013	13,179	CEP ⁴ (two adults and one child in the household)	76,464
Child allowance	4,778	Bank savings at the end of the year	5,476
		Cash savings at the end of the year	186,305
TOTAL INCOME	321,171	TOTAL EXPENSES	370,830
Balance: - 49,659 MDL			

⁴ The CEP for any year between 2006 - 2018 is calculated based on NBS methodology applied for the period of 2006-2018 (on the basis of "stable population" in the „discontinued series") and the method available on the NBS site (ENG). In this case, the indicator of Consumption expenditures by population according to purpose of expenditures, number of children and area 2006-2018 is chosen with the following variables: Year - Consumption expenditures total – Area (Urban/Rural) – Number of children (if no children, without children is chosen) – Lei, average monthly per capita for one person. The generated result is multiplied by the number of family members and 12 calendar months.

The CEP for any year between 2019 - 2022 is calculated based on NBS methodology and the method available on the NBS site (ENG). In this case, the indicator of Consumption expenditures by population according to purpose of expenditures, number of children and area 2019-2022 is chosen with the following variables: Year - Consumption expenditures total – Area (Urban/Rural) – Number of children (if no children, without children is chosen) – Lei, average monthly per capita for one person. The generated result is multiplied by the number of family members and 12 calendar months.

52. **Inexplicable wealth for 2015.** According to information available to the Panel, the total net income of the subject's household for the year 2015 amounted to 420,107 MDL. The total expenditure amounted to 442,651 MDL. Thus, the total outgoing financial flow exceeded incoming financial flows by 22,544 MDL.
53. The incoming financial flow includes: according to STS database (1) the subject's net salary from the Prosecutor's Office, in amount of 67,769 MDL; (2) spouse net salary from "DOCMEN-DECLARANT" S.R.L., in amount of 3,704 MDL; (3) spouse net salary from Customs Office in amount of 4,892 MDL; (4) child allowance in amount of 916 MDL according to the information from MConnect portal; (5) income from sale of the vehicle Toyota Avensis, m./y. 2003 in amount of 60,000 MDL (according to subject's 2015 annual declaration submitted to NIC on 22 February 2016); (6) income from sale of the vehicle Toyota Avensis, m./y. 2007 in amount of 90,000 MDL (according to subject's 2015 annual declaration submitted to NIC on 22 February 2016); (7) bank savings in amount of 5,476 MDL according the bank statement of the account no. 40xxxx420 (S.A. Banca de Economii); (8) income from the transfer of 50 EUR (equivalent to 1,045 MDL) received by subject's wife from T. B. (Israel), as it was identified by the Panel in the banks documentation (transfer UNISTRIM).
54. The incoming financial flow includes also (9) the cash savings at the end of 2014 – beginning of 2015, in amount of 10,000 EUR (equivalent to 186,305 MDL). In written communication with the Panel (R2 - Q3) the declared that he had at the end of 2014 cash savings of 10,000 EUR, explaining that „*Funds obtained from the wedding, christening, and birth of the child*” and reiterated that he does not possess exact data regarding the remaining cash balance at the end of each calendar year and the indicated amounts were approximate and based solely on memory.
55. Regarding this cash savings at the end of 2014 – beginning of 2015, in amount of 10,000 EUR (equivalent to 186,305 MDL), the subject informed the Panel during written communication (R3 - Q2) that, as he had already mentioned in his answer concerning 2014, he cannot agree with the calculation of cash available for 2015 in the amount of 186,305 MDL, as this sum was converted according to the exchange rate of 2014. He stated that at the beginning of 2015 he had cash savings of 10,000 EUR, which, based on the NBM average exchange rate for 2015 (1 EUR = 20.9025 MDL), amounted to 209,025 MDL. The subject further pointed out that this exchange rate was used by the Commission at the end of 2015 when converting his outstanding amount of 7,000 EUR (cash savings declared at the end of 2015), resulting in 146,318 MDL. He considered it incorrect that, for the same year, the Panel applied different conversion methods: for the income side, using the previous year's exchange rate to his detriment, while for the expenses side, using the current year's rate. In his view, this approach is contradictory, since the Commission itself has ruled that all currency conversions are to be performed at the average NBM exchange rate applicable for the current year.
56. The Panel cannot accept this argument, as the subject had already possessed these funds in 2014, and therefore the NBM equivalent in MDL must be reflected at the exchange rate

applicable to 2014, the year in which the funds were declared, as well as for the cash savings declared as held at the end of 2015 in the amount of 7,000 EUR. In addition, the Panel cannot convert the cash savings declared at year-end using the same exchange rate as for the previous year, as there is no confirmation that the funds were not exchanged during the year.

57. It follows that for the calendar year 2015, the subject's family's income totaling 420,107 MDL.
58. The subject's household outgoing financial flows in 2014 calendar year include the next expenses: (1) amount of 182,279 MDL for the purchase and import of SKODA OCTAVIA car m./y. 2011, which includes 120,000 MDL (contractual price declared in 2015 annual declaration submitted to NIC on 22 February 2016), customs duties in amount of 50,365 MDL and expenses in amount of 570 EUR (equivalent to 11,914 MDL) for delivery and registration in the Republic of Moldova (according to subject answer in written communication (R1 - Q13.2).
59. The Panel notes that according to Customs Service database, the value established by Customs Office on the data of imports (30 August 2025) was 130,000 MDL and customs duties in amount of 50,365 MDL. The Panel has accepted the contractual value declared by subject, i.e. 120,000 MDL, since this amount does not differ substantially from that calculated by the customs office (130,000 MDL), and does not essentially change the financial situation of the subject.
60. The financial outflow for 2015 includes also (2) travel expenses in amount of 1,200 EUR (equivalent to 25,083 MDL) according to the information provided by subject in written communication (R2 - Q6); (3) the payments of the monthly gym membership to the Unica Sport Fitness Center, in amount of 350 MDL per month, calculated in amount of 4,200 MDL per 2015. This amount was disputed by the subject in written communication (R3 - Q1), asking to be reduced since 2015, his wife was pregnant, and on 11 March 2016 she gave birth to their second child. The Panel noted these circumstances and reduced the expenses by half, to the amount of 2,100 MDL.
61. According to subject's answer in written communication (R2 - Q3), the financial outflow for 2015 includes also (4) cash savings at the end of 2015 in amount of 7,000 (equivalent to 146,318 MDL), being converted into MDL at the NBM exchange rate for 2015 and based on the analysis of the bank accounts held by subject and his wife the Panel identified (5) bank savings at the end of the year in amount of 39 MDL.
62. The Panel has included in the outgoing financial flow (6) the family CEP to quantify expenses for his household composed of two adults and one child, in urban areas, in amount of 86,832 MDL. The subject informed the Panel in written communication (R3 - Q2) that the CEP for his family shall be reduced based on for the reason that, when calculating it, the coefficients for the urban area were used, but in 2015 the subject lived with his parents in Ciorescu commune, mun. Chişinău. Also, his wife could spend months in a row in the

in-laws' house in Bender. The Panel did not agree to reduce the CEP for the same reasons as mentioned in the para. 49.

63. It follows that for the calendar year 2015 the subject's family's financial outgoing flow was in amount of 442,651 MDL.

64. Considering all the above, the total negative difference between wealth, expenses and income (unjustified wealth) in 2015 was in amount of 22,544 MDL.

Table 2. Income and expenses table for calendar year 2015

Incoming financial flows (MDL)		Outgoing financial flows (MDL)	
Description	Amount	Description	Amount
Salary from the Prosecutor's Office	67,769	Vacation expenses	25,083
Cash savings carried over from 2014	186,305	Gym membership fee	2,100
Bank savings carried over from 2014	5,476	Purchase of a SKODA OCTAVIA car, m./y. 2011	182,279
Wife's salary from DOCMEN-DECLARANT S.R.L.	3,704	CCP (two adults and one child in the household)	86,832
Wife's salary from the Customs Service of the Republic of Moldova	4,892	Bank savings at the end of the year	39
Sale of a Toyota Avensis car, m./y. 2003	60,000	Cash savings at the end of the year	146,318 MDL
Sale of a Toyota Avensis car, m./y. 2007	90,000		
Child allowance	916		
Transfer from B. T.	1,045		
TOTAL INCOME	420,107	TOTAL EXPENSES	442,651
Balance: -22,544 MDL			

65. **Inexplicable wealth in 2018.** According to information available to the Panel, the total net income of the subject's household for the year 2018 amounted to 337,573 MDL whereas total expenditure amounted to 369,775 MDL. Thus, the total outgoing financial flow exceeded incoming financial flows by **32,202 MDL**.

66. The incoming financial flow of the subject's household includes: (1) the subject's net salary from the Prosecutor's Office in amount of 189,112 MDL, according to STS database; (2) child allowance in amount of 5,940 MDL, according to the bank statement of account no. 22xxx85 (B.C. MAIB S.A); (3) income from sale of the SKODA OCTAVIA car m./y. 2011, r/no. [REDACTED], in amount of 100,000 MDL, according to subject's 2018 annual declaration

submitted NIA on 26 March 2019 and his replies in written communication (R1 - Q12 and R2 - Q15); (4) cash savings at the end of 2017 – beginning of 2018, in amount of 2,000 EUR (equivalent to 41,661 MDL), declared by subject in written communication with the Panel (R2 - Q3), as „*Funds obtained from the wedding, christening, and birth of the child*”; (5) bank savings at the end of the year in amount of 860 MDL according to bank statement of the account no. 22xxx43 (B.C. MAIB S.A).

67. It follows that for the calendar year 2018, the subject’s family’s income was **337,573 MDL**.

68. The outgoing financial flow of the subject’s household includes: (1) expenses of 120,000 MDL for purchase of MERCEDES E 300 car m./y. 2009, as declared in 2018 annual declaration submitted to NIA on 26 March 2019; (2) travel expenses in amount of 500 EUR (equivalent to 9,925 MDL) according to the information provided by subject in written communication (R2 - Q6); (3) cash savings of 4,000 EUR (equivalent to 79,397 MDL), according to subject answers in written communication (R2 - Q3), as converted into MDL at the NBM exchange rate for 2018; (4) bank savings at the end of the year in amount of 3,965 MDL.

69. The outgoing financial flow includes also (5) payments to Unica Sport fitness center of 350 MDL per month, as informed in written communication by subject (R2 - Q7), for 2017 – 2019. The Panel has calculated a total of 4,200 MDL per year and paid for 2018. In written communication (R3 - Q3), the subject disputed the amount of 4,200 MDL, paid to Unica Sport Fitness Center, claiming that it should be reduced in half due to the fact that his wife did not attend gym the entire year, as mentioned in R2 - Q7 (no card payments were identified). The Panel notes the subject did not provide any proof in this regard. Furthermore, accepting or rejecting the reduction does not fundamentally alter the calculation and does not affect the financial situation of the subject’s family. Thus, the Panel considered the amount of 4,200 MDL, based on his initial reply in R2 – Q7.

70. Another expense was (6) kindergarten fees in amount of 30,800 MDL, according to subject’s statements presented in written communication (R1). In response to the third round of questions (R3 - Q3), the subject informed the Panel that he cannot agree to the inclusion of the kindergarten expenses, as these were covered by his parents. The Panel analyzed the subject’s explanations regarding the exclusion of the kindergarten expenses on the grounds that these were covered by his parents. However, the Panel cannot agree with this argument, since in the statements presented by him in written communication (R1 - Q6) the payments are indicated as being supported by the subject and he did not provide any proof in support of his claims.

71. The Panel has included in the outgoing financial flow (7) the CEP for subject’s household composed of two adults and two children, in urban areas, in amount of 121,488 MDL. The subject informed the Panel in written communication (R3 - Q3) that the CEP for his family shall be reduced in half based on for the reason that, when calculating it, the coefficients for the urban area were used, but subject lived in 2018 with his parents in Ciorescu commune, Chişinău municipality and his wife could spend months in a row in the in-laws’ house in Bender.

72. The Panel has analyzed the information collected and cannot agree with subject argument for the same reasons as mentioned in paras. 49 and 62. Also the Panel notes that the subject's spouse had the residency at the address Chişinău municipality, A.I. Street, ap. N, between 17 October 2017 and 16 October 2018. This property had been purchased by the subject on 18 July 2007. The Panel notes that the subject had another residency in the period of 7 March 2007 and 21 April 2021: Ciorescu commune. Moreover, subject's wife changed her residence to her parents' address after purchasing a Mercedes E 300, m./y. 2009 on 19 October 2018, and the vehicle was registered with neutral license plates, in the Transnistrian region. The Panel emphasizes in order to register the vehicle in Transnistria, his wife had to change her place of residence to her parents' address in Bender. Also, the Panel notes that in 2018 the subject and his spouse were raising two children (born on 9 September 2010 and on 11 March 2016) and it appears highly unlikely that the subject resided with his parents while his spouse and child lived separately at her parents in Bender. The subject did not provide any proof in support of his affirmations, and the Panel cannot accept this argument.
73. It follows that for the calendar year 2018 the subject's family's financial outgoing flow was in amount of 369,775 MDL.
74. Considering all the above, the total negative difference between wealth, expenses and income (unjustified wealth) in 2018 was in amount of **32,202 MDL**.

Table 3. Income and expenses table for calendar year 2018

Incoming financial flows (MDL)		Outgoing financial flows (MDL)	
Description	Amount	Description	Amount
Salary from the Prosecutor's Office	189,112	Payment for kindergarten	30,800
Cash savings carried over from 2017	41,661	Vacation expenses	9,925
Bank savings carried over from 2017	860	Gym membership fee	4,200
Childcare allowance	5,940	Purchase of MERCEDES E 300 car m./y. 2009	120,000
Income from the sale of a SKODA OCTAVIA car, m./y. 2011	100,000	CEP (two adults and two children in the household)	121,488
		Bank savings at the end of the year	3,965
		Cash savings at the end of the year	79,397 MDL
TOTAL INCOME	337,573	TOTAL EXPENSES	369,775
Balance: - 32,202 MDL			

75. **Inexplicable wealth in 2019.** According to information available to the Panel, the total net income of the subject's household for the year 2019 amounted to 257,779 MDL whereas total expenditure amounted to 301,304 MDL. Thus, the total outgoing financial flow exceeded incoming financial flows by 43,525 MDL.
76. The incoming financial flow of the subject household includes: (1) the subject's net salary from the Prosecutor's Office in amount of 169,977 MDL, according to the STS database; (2) allowance for incapacity of work in amount of 2,393 MDL; (3) child allowance in amount of 2,047 MDL, according to the bank statement of the account no. 22xxx85 (B.C. MAIB S.A); (4) bank savings in amount of 3,965 MDL according to the bank statement of the account no. 22xxx43 (B.C. MAIB S.A); (5) cash savings at the end of 2018 – beginning of 2019, in amount of 4,000 EUR (equivalent to 79,397 MDL), declared by subject in written communication with the Panel (R2 - Q3), as „*Funds obtained from the wedding, christening, and birth of the child*”. He noted that the amounts indicated were approximate and based solely on memory.
77. It follows that for the calendar year 2019, the subject's family's income was in amount **257,779 MDL.**
78. The outgoing financial flow of the subject's household includes: (1) travel expenses of four members of family in total of 28,867 MDL, according to the information provided by subject in written communication (R2 - Q5); (2) kindergarten fees in amount of 35,200 MDL and (3) tuition fees for his son at a private school, amounting to 31,543 MDL, according to documents presented by subject in written communication (R1). The Panel notes that in written communication (R3 - Q4), the subject informed the Panel that he cannot agree to the inclusion of the kindergarten expenses, as these were covered by his parents. The Panel cannot accept subject's claims for the same reasons outlined in para. 70.
79. The outgoing financial flow also includes (4) cash savings at the end of 2019 in amount of 3,000 EUR (equivalent to 59,021 MDL), according to subject's answers in written communication (R2- Q3), as converted into MDL at the NBM exchange rate for 2019; (5) bank savings at the end of the year in amount of 393 MDL, based on the analysis of the bank accounts held by subject and his wife; (6) payment to Unica Sport Fitness Center of 350 MDL per month, as informed in written communication by subject (R2 - Q7), for 2017 – 2019. The Panel has calculated a total of 4,200 MDL per year and paid for 2019. In written communication (R3 - Q3), the subject disputed the amount of 4,200 MDL, paid to Unica Sport Fitness Center, claiming that it should be reduced in half due to the fact that his wife did not attend the gym entire year, as mentioned in R2 - Q7 (no card payments were identified). The Panel notes cannot agree with subject claims for the same reasons as mentioned in para. 69.
80. The Panel also has included in the outgoing financial flow the CEP for his family composed of two adults and two children, in urban area, in amount of 142,080 MDL. The subject informed the Panel in written communication (R3 - Q4) that the CEP for his family shall be reduced in half based on for the reason that, when calculating it, the coefficients for the

urban area were used, but subject lived in 2019 with his parents in Ciorescu commune, Chişinău municipality and also, his wife could spend months in a row in the in-laws' house in Bender municipality. The Panel cannot accept this argument for the same reasons as it is mentioned in para. 72. Also, the Panel notes that both subject's children had attended during the year the education institutions for children in Chişinău municipality, so it is unlikely that they will be absent for long periods of time.

81. It follows that for the calendar year 2019 the subject's family's financial outgoing flow was in amount of 301,304 MDL.

82. Considering all the above, the total negative difference between wealth, expenses and income (unjustified wealth) in 2018 was in amount of **43,525 MDL**.

Table 4. Income and expenses table for calendar year 2019

Incoming financial flows (MDL)		Outgoing financial flows (MDL)	
Description	Amount	Description	Salary
Salary from the Prosecutor's Office	169,977	Payment for kindergarten	35,200
Cash savings carried over from 2018	79,397	Payment for private school	31,543
Bank savings carried over from 2018	3,965	Vacation expenses	28,867
Temporary incapacity for work allowance	2,393	Gym membership fee	4,200
Childcare allowance	2,047	CCP (two adults and two children in the household)	142,080
		Bank savings at the end of the year	393
		Cash savings at the end of the year	59,021
TOTAL INCOME	257,779	TOTAL EXPENSES	301,304
Balance: - 43,525 MDL			

83. The Panel's doubts were generated by the difference between the subject's family's income and expenses for the years 2014, 2015, 2018 and 2019 and the inconsistent explanations provided by the subject during the written rounds of questions. Even if the negative balances for these years were treated as unjustified wealth, their cumulative value does not exceed the threshold of 234,000 MDL under art. 11 para. (3) lit. a) of Law No. 252/2023.

84. Since the difference between wealth, expenses and income does not exceed the threshold established by law, this does not lead to the subject's failure of the evaluation under financial integrity criteria established in art. 11 para. (3) lit. a) of the mentioned law.

Issue 2. The involvement of the subject in the ECtHR case I.E. v. the Republic of Moldova, judgment No. 45422/13, 26 May 2020

85. According to art. 11 para. (2) lit. a) of Law No. 252/2023, the subject does not meet the criterion of ethical integrity if the Commission determined that the subject issued arbitrary acts, over the last 10 years, contrary to the imperative rules of the law, and the European Court of Human Rights (“ECtHR”) had established, before the adoption of the act, that a similar decision was contrary to the ECHR.
86. By judgment No 2 of 16 January 2025, the Constitutional Court declared these provisions as being constitutional. It stated that according to these provisions, to determine the arbitrariness of an act issued by a subject, the Evaluation Commission must establish that two cumulative conditions are met. The first condition is that the act in question is contrary to imperative rules of law. The second condition is that, prior to the adoption of the act, the ECtHR had found that a similar decision was contrary to the ECHR.
87. According to the information available to the Panel, the subject was involved in some acts that are referred to in the ECtHR judgment *I.E. v. the Republic of Moldova*, No. 45422/13, 26 May 2020⁵.
88. Relevant to the subject’s acts in this case, the applicant complained that he had been unlawfully detained without any valid reasons. The ECtHR held that there has been a violation of Article 5 § 1 of the ECHR.
89. According to materials obtained from the Governmental Agent, on 13 August 2012, the applicant, who was a minor at the time of the events, was arrested on suspicion of murder. The subject’s order to arrest the applicant referred to the alleged participation of the latter in murdering – together with another accused, after which the perpetrators had taken objects from the victim and set his car on fire in order to hide the evidence of the crime. Also on 13 August 2012, an investigating judge ordered his detention pending trial for thirty days. His detention was subsequently extended several times and eventually expired on 9 December 2012.
90. On 6 December 2012, the subject initiated another criminal investigation against the applicant in regard to, respectively, aggravated robbery and the destruction of the property during the events of 12 August 2012. On 9 December 2012, the applicant’s detention pending trial expired and he was released. On the same day, he was again arrested as part of the new criminal investigation.
91. On 10 December 2012, the subject asked the investigating judge to order the applicant’s detention pending trial for thirty days. He noted, *inter alia*, that the applicant was accused in another criminal case. On the same day an investigating judge ordered the applicant’s detention pending trial for thirty days. The judge noted that the expiry of the four-month

⁵ Available at: <https://hudoc.echr.coe.int/eng?i=001-202526>.

time-limit provided by law did not affect the applicant's situation, since detention was now being sought in connection with another criminal case against him.

92. The applicant appealed, the applicant's lawyer noting, *inter alia*, that under art. 186 para. (4) of the Criminal Procedure Code, a minor could not be held in detention pending trial for longer than four months. On 27 December 2012, the Chişinău Court of Appeal upheld the decision of 10 December 2012.
93. The ECtHR considered that the artificial separation of the charges with the obvious aim of extending the time-limit in respect of the applicant's detention (which would otherwise have been unlawful) constituted an element of bad faith on the part of the authorities. As such, the applicant's detention in respect of newly opened criminal proceedings after 9 December 2012 was arbitrary, within the meaning of Article 5 § 1 of the ECHR.
94. The Panel established that the subject's actions took place in 2012, before the ten-year period provided by art. 11 para. (2) lit. a) of Law No. 252/2023. For this reason, the Panel did not pursue this issue further.

VI. Conclusion

95. Based on the information it obtained and that was presented by the subject, the Panel proposes that Grigore CLEVADÎ passes the external evaluation made according to the criteria set in art. 11 of Law No. 252/2023.

VII. Further Action and Publication

96. According to art. 17 para. (5) of Law No. 252/2023, this evaluation report shall be sent by e-mail to the subject and the SCP within three days of its approval, and on the same day the Commission will publish on its official website the information on the result of the evaluation.
97. Under art. 17 para. (6) of Law No. 252/2023, the Commission will submit to the SCP, within three days of approval of the evaluation report, a hard copy of that evaluation report, along with an electronic copy of the evaluation file of the subject.
98. Under art. 17 para. (8) of Law No. 252/2023 the evaluation report, in full, will be published on the Commission's official website, with appropriate precautions to protect the privacy of the subject and other people, within three days from the expiry of the deadline for appealing the SCP's decision (pursuant to art. 18 para. (3) lit. a) and c) of Law No. 252/2023) or from the date of issuance of the Supreme Court of Justice's decision (pursuant to art. 19 para. (5) point 1) and point 2) lit. c) of Law No. 252/2023).

99. Pursuant to art. 17 para (2) of Law No. 252/2023, this evaluation report was approved unanimously by the evaluation panel on 17 November 2025 and signed by the Vice-Chairperson of the Commission.

100. Done in English and Romanian.

Signature:

Virginia MORARU
Vice-Chairperson
Prosecutor Vetting Commission