

**Evaluation Report No. 17 of 18 December 2025
on Ghennadi EPURE, prosecutor in the Anti-Corruption Prosecutor's Office,
subject of evaluation under Law No. 252/2023**

Evaluation Panel A (“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 7 November 2025 and approved this report on 18 December 2025.

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

*Christopher LEHMANN – Panel’s Chair
Nadejda HRIPTIEVSCHI
Saskia de VRIES*

Based on its work in collecting and reviewing the information, and subsequent deliberations, Panel A prepared the following evaluation report.

I. Introduction

1. This report concerns the subject of evaluation Ghennadi EPURE, prosecutor in the Anti-Corruption Prosecutor's Office (“APO”).
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 Ghennadi EPURE meets the ethical and financial integrity criteria identified in Law No. 252/2023.

II. Subject of the Evaluation

4. Ghennadi EPURE (“the subject”) was appointed as a prosecutor within the Chisinau Prosecutor’s Office on 4 December 2017. He was subsequently delegated to the APO during two separate periods: from 25 November 2019 to 15 December 2019, and from 1 November 2021 to 8 December 2022. On 9 December 2022, the subject was transferred to the APO.

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 para. (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 unjustified 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. Ghennadi EPURE 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 was evaluated based on provisions of art. 3 para. (1) lit. e) 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 10 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 A.
21. On 16 August 2024, the Commission notified by email the subject that his evaluation file had been randomly assigned to Panel A, composed of Nadejda HRIPTIEVSCHI, Christopher LEHMANN (Panel’s Chair) and Saskia de VRIES. The subject was informed that he may request, in writing and at the earliest possible time, the recusal of members from their evaluation.
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 5, 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 financial criteria evaluation included 2012-2023 and the income earned up to 2012 by the subject’s parents-in-law, pursuant to his request. The evaluation period for the ethical criterion includes the past 5 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 under Law No. 133/2016 on the declaration of assets and personal interests (“Law No. 133/2016”).
24. As part of the evaluation of the ethical and financial integrity of the subject, the Commission obtained information from numerous sources. The sources generally included the GPO, specialized Prosecutor’s Offices, Superior Council of Prosecutors (“SCP”), National Integrity Authority (“NIA”), National Anti-Corruption Center (“NAC”), Office

for Prevention and Fight Against Money Laundering (“AML”), Ministry of Internal Affairs (“MIA”), Customs Service, State Tax Service (“STS”), General Inspectorate of 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. One complaint was received from a member 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 24 January 2025, the Panel asked the subject to provide additional information by 31 January 2025 to clarify certain matters (“first round of questions”). The subject provided answers and documents - within the set deadline – on 31 January 2025. On 5 August 2025, the Panel asked the subject to provide additional information by 13 August 2025 to clarify certain matters (“second round of questions”). The subject provided answers and documents - within the set deadline – on 13 August 2025. On 2 September 2025, the Panel asked the subject to provide additional information by 9 September 2025 to clarify certain matters (“third round of questions”). The subject provided answers and documents - within the set deadline – on 8 September 2025. On 12 September 2025, the Panel asked the subject to provide additional information by 19 September 2025 to clarify certain matters (“fourth round of questions”). The subject provided answers and documents - within the set deadline – on 19 September 2025. On 8 October 2025, the Panel asked the subject to provide additional information by 16 October 2025 to clarify certain matters (“fifth round of questions”). The subject provided answers and documents - within the set deadline – on 10 October 2025.
27. On 27 October 2025, the Panel notified the subject that it had identified two areas of doubt about his compliance with the integrity criteria and invited the subject to attend a public hearing on 7 November 2025 pursuant to art. 16 para. (2) of Law No. 252/2023. The Panel informed the subject that, in view of the pending court proceedings, the second issue would be considered in closed session. The subject was also informed about his rights under art. 16 para. (5) of Law No. 252/2023 and that he could request access to the evaluation materials.
28. Following the subject’s request, on 31 October 2025, the subject was granted access to the evaluation materials according to art. 16 para. (5) lit. c) of Law No. 252/2023.
29. The subject sent additional information and documents on his own initiative on 4 November 2025.
30. On 7 November 2025, the subject took part in a public hearing of the Panel.

31. 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

32. This section discusses the relevant facts and reasons for the Panel's conclusion.

33. Based on the information it collected, the Panel analyzed and, where necessary, sought further clarifications from the subject on the following matters:

- Non-declaration of loans obtained from financial institutions during the period 2014–2023.
- Non-declaration of wife's position within the Public Association for Civic Responsibility "INSPERA".
- Unjustified wealth in 2020.
- Handling of a criminal case concerning against Sinilga Šcolnic and Pavel Todica.

34. The first two issues were mitigated before the hearing. The last two issues were discussed at the hearing.

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. Non-declaration of loans obtained from financial institutions during the period 2014–2023.

35. The Panel's verification of the subject's annual declarations of assets and personal interests ("annual declarations"), cross-checked with information obtained from financial institutions, revealed discrepancies between the loans actually contracted and those reported to the NIA. The subject declared only three liabilities: a 30,000 MDL loan contracted in 2016, a 6,999 MDL loan in 2017, and a 950,000 MDL housing loan obtained in 2020 under the Prima Casă Program. However, although he was legally obliged to declare loans starting with 2014 pursuant to Law No. 1264/2002 and, later on, Law No. 133/2016, several microcredit loans from non-bank credit organizations were omitted as outlined below:

Nr.	Debtor	Loan type	Amount granted (MDL)	Date contracted	Due date	Declaration
1	Ghennadi EPURE	personal expenses	5,000	18.08.2014	18.03.2015	Not declared
2	Ghennadi EPURE	personal expenses	5,000	18.08.2014	26.02.2015	Not declared
3	Ghennadi EPURE	personal expenses	11,358	05.05.2015	05.05.2016	Not declared
4	Ghennadi EPURE	personal expenses	30,000	29.06.2016	09.07.2020	Declared upon employment
5	Ghennadi EPURE	credit card	35,000	09.11.2018	21.10.2021	Not declared

6	Ghennadi EPURE	personal needs	3,500	02.09.2018	02.10.2018	Not declared
7	Ghennadi EPURE	personal needs	3,812	29.09.2018	03.10.2018	Not declared
8	Ghennadi EPURE	personal needs	4,713	22.10.2018	12.11.2018	Not declared
9	Ghennadi EPURE	personal needs	5,584	30.03.2019	08.04.2019	Not declared
10	Ghennadi EPURE	personal expenses, refinance	50,000	05.04.2019	05.04.2021	Not declared
11	Ghennadi EPURE	purchase of goods in installments	6,000	30.08.2019	27.02.2020	Not declared
12	Ghennadi EPURE	personal needs	2,000	12.11.2019	26.11.2019	Not declared
13	Ghennadi EPURE	purchase of goods in installments	4,624	30.12.2019	30.03.2020	Not declared
14	Ghennadi EPURE	personal needs	4,599	02.02.2020	04.05.2020	Not declared
15	Ghennadi EPURE	purchase of goods in installments	1,899	24.02.2020	28.05.2020	Not declared
16	Ghennadi EPURE	purchase of goods in installments	60,000	30.10.2020	06.04.2021	Not declared
17	Ghennadi EPURE	purchase of goods in installments	18,498	16.01.2021	17.01.2022	Not declared
18	Ghennadi EPURE	personal expenses	92,000	26.05.2021	26.05.2026	Not declared
19	Ghennadi EPURE	purchase of goods in installments	4,675	18.08.2021	08.07.2022	Not declared
20	Ghennadi EPURE	purchase of goods in installments	8,999	05.01.2022	04.07.2022	Not declared
21	Ghennadi EPURE	purchase of goods in installments	9,999	05.01.2022	04.07.2022	Not declared
22	Ghennadi EPURE	credit card	20,000	28.03.2022	active	Not declared
23	Wife	purchase of goods in installments	1,699	04.08.2022	04.09.2022	Not declared
24	Ghennadi EPURE	purchase of goods in installments	14,966	23.05.2022	23.01.2023	Not declared
25	Wife	credit card	17,000	08.09.2022	active	Not declared
26	Ghennadi EPURE	purchase of goods in installments	3,299	06.10.2022	03.10.2023	Not declared
27	Wife	purchase of goods in installments	11,300	25.04.2023	11.07.2023	Not declared
28	Ghennadi EPURE	purchase of goods in installments	3,399	30.05.2023	02.04.2024	Not declared

36. The Panel notes that, at the time the loans were contracted (2014–2015), the subject was subject to the declaratory regime established by Law No. 1264/2002. Pursuant to art. 4 para. (1) lit. f) of that law, declarants were required to declare all personal debts, including loans and credits, existing at the date of submission of the declaration of income and property. The legal framework in force at that time did not provide for any quantitative threshold. Accordingly, any outstanding loan, irrespective of its amount, fell within the scope of the declaratory obligation, provided it existed as a debt at the relevant reporting date.

37. In this context, the Panel observes that the subject contracted three loans from non-bank credit organizations in the following amounts: 5,000 MDL (contracted on 18 August 2014, maturing on 18 March 2015), 5,000 MDL (contracted on 18 August 2014, maturing on 26 February 2015), and 11,358 MDL (contracted on 5 May 2015, maturing on 5 May 2016). Each of these loans constituted a personal debt during the relevant reporting periods and therefore fell within the declaratory obligation imposed by art. 4 para. (1) lit. f) of Law No. 1264/2002.

38. With respect to the period 2018–2023, the Panel notes that the subject's declaratory obligations were governed by Law No. 133/2016. Under art. 4 para. (1) lit. e) of that law, the declarant is required to declare all personal debts, regardless of their origin or contractual form, whose cumulative value, as of the date of submission of the annual declaration, exceeds 10 average monthly salaries on the economy for the respective year. Consequently, the assessment is not limited to the value of individual loans taken separately, but must focus on the cumulative outstanding indebtedness for each reporting year.

39. Applying this legal standard, the Panel notes that the subject entered the examined period already encumbered by a loan of 30,000 MDL contracted in 2016, which remained outstanding until July 2020. This debt therefore formed part of the subject's cumulative indebtedness for the years 2018, 2019, and 2020. When this obligation is aggregated with the loans contracted during those years (credit card facilities, personal consumption loans, and installment-based purchases) the subject's cumulative indebtedness for each of those years exceeded the declarable thresholds established for 2018 (61,500 MDL), 2019 (69,750 MDL), and 2020 (79,530 MDL). The cumulative indebtedness amounted to 77,025 MDL in 2018, 98,208 MDL in 2019, and 146,498 MDL in 2020, respectively, each figure being significantly above the applicable statutory threshold.

40. In 2021, the subject's level of indebtedness further increased following the contracting of a loan in the amount of 92,000 MDL, together with additional installment-based obligations. As a result, the subject's cumulative outstanding indebtedness for that year reached 225,173 MDL, substantially exceeding the declarable threshold of 87,160 MDL applicable for 2021.

41. In 2022 and 2023, the subject's cumulative outstanding debt amounted to 191,135 MDL and 161,964 MDL, respectively, and thus continued to exceed the statutory thresholds

applicable for those years. In neither of these years did the subject declare the respective debts.

42. In response to the first round of questions (R1-Q11), the subject was requested to clarify the purpose of the loans, repayment sources, and to provide supporting documents. He acknowledged the omissions, explaining that he had misinterpreted the legal framework and believed that such microloans did not fall within the scope of declarable liabilities, given the absence of an explicit reference in Law No. 133/2016.
43. The subject further stated that all loans were contracted for household or personal needs and were repaid from salary income in accordance with repayment schedules. He added that he relied solely on the “Liabilities” section wording in the declaration form and had not familiarized himself with NIA Order No. 15/2018 governing the completion of declarations.
44. The duty to declare the loans arises from both Law No. 1264/2002 and Law No. 133/2016.
45. Art. 4 para. (1) lit. e) of Law No. 133/2016 defined liabilities. Moreover, point 41 of the Regulation approved by NIA Order No. 15/2018 (and later Order No. 4/2022) expressly provides for the disclosure of loans and credits whose cumulative value exceeds ten average monthly salaries.
46. Reliance solely on the declaration form or ignorance of implementing regulations does not exempt a declarant from legal responsibility. Declarants have a duty to verify their obligations, and the legal framework applicable during the reporting period left no reasonable ambiguity regarding the requirement to declare outstanding loans.
47. In the present case, the subject failed to declare loans that exceeded the statutory threshold and misinterpreted the legal provisions.
48. Under Law No. 252/2023, failures to declare assets to the NIA may be attributable to either the criterion of ethical or financial integrity, or both. For example, such infractions may raise questions about a subject’s adherence to honesty and rectitude in financial matters, or separately, the subject’s ethical adherence to the reporting obligations required under the financial disclosure laws. The Panel may also required to verify whether the failure to declare assets give rise to concerns related to inexplicable wealth.
49. Failure to declare assets to the NIA may constitute, in itself, an ethical violation. Pursuant to art. 6.6¹.7 of the Prosecutors’ Code of Ethics, prosecutors have a duty to refrain from concealing or distorting information regarding the assets they hold and must ensure full disclosure of such information.
50. One of the purposes of Law No. 133/2016 is to foster transparency among public officials; another is to prevent and sanction financial impropriety, including the acquisition of assets from obscure or illicit sources.

51. Under art. 11 para. (2) lit. a) of Law No. 252/2023, only serious ethical violations may be attributed to the criterion of ethical integrity, and such violations must be clearly established by the Commission. Not every instance of non-compliance with asset declaration requirements justifies dismissal from office (*Nikëhasani v. Albania*, 13 December 2022, § 117; *Sevdari v. Albania*, 13 December 2022, § 85; *Thanza v. Albania*, 4 July 2023, § 153).
52. In the present case, the Panel assessed whether the subject's repeated failure to declare personal liabilities was serious enough to undermine the core ethical standards expected of a prosecutor. The omissions occurred over several years and indicated a lack of due care in complying with the asset declaration rules.
53. At the same time, the Panel found no evidence of deliberate misrepresentation or efforts to hide unjustified wealth. The undeclared liabilities were mainly consumer loans, repaid from the subject's declared salary, and were not used to acquire assets inconsistent with his lawful income.
54. While the issue raises real concerns regarding the subject's diligence in completing declarations, the Panel concluded that the subject's non-compliance for several years with the asset declaration regime set forth by Law No. 1264/2002 and then Law No. 133/2016, even if deeply questionable as per art. 6.6¹.7 of the Prosecutor Code of Ethics, can be deemed as an error that has not risen to the high threshold of a serious ethical violation under art. 11 para. (2) lit. a) of Law No. 252/2023, warranting dismissal from office and other negative effects for the subject.
55. Therefore, the Panel must conclude that the subject meets the criterion of ethical integrity under art. 11 para. (2) lit. a) of Law No. 252/2023.

Issue 2. Non-declaration of wife's position within the Public Association for Civic Responsibility "INSPERA".

56. In his annual declarations for 2020 and 2021, the subject did not declare his wife's position as Member of the Board of Directors of the Public Association for Civic Responsibility "INSPERA".
57. According to information provided in the first two rounds of questions (R1-Q13-14, R2-Q10), and confirmed by "INSPERA," the subject's wife held this position from 13 February 2020 to 14 January 2022. The position was formally removed only on 12 August 2025, after the subject was asked by the Panel about the reasons for not declaring the position.
58. The subject acknowledged the omission and explained that the association was founded before the marriage, had no activity, and produced no results; therefore, his wife did not consider the position significant. According to the subject, she further believed that the membership expired automatically under the association's statute. Only in August 2025, did she learn, upon requesting official confirmation, that no automatic expiration occurred and that formal removal was required.

59. The omission constitutes a breach of art. 4 para. (1) lit. i) of Law No. 133/2016, regardless of the association's inactivity or the subject's subjective perception of significance. Declarants must report positions held by spouses in non-governmental entities, and this obligation is independent of operational activity or presumed expiration. The explanation indicates that the omission resulted from an unverified assumption. However, the law places a proactive verification duty on the declarant. The subject did not fulfill this duty; therefore, the omission has no legal justification.

60. . While the issue raises further concerns regarding the subject's diligence in completing declarations, the Panel concluded that the subject's non-compliance in 2021 and 2022 with the asset declaration regime set forth by Law No. 133/2016, even if questionable as per art. 6.6¹.7 of the Prosecutor Code of Ethics, can be deemed as an error that has not risen to the high threshold of a serious ethical violation under art. 11 para. (2) lit. a) of Law No. 252/2023, warranting dismissal from office and other negative effects for the subject.

61. Therefore, the Panel must conclude that the subject meets the criterion of ethical integrity under art. 11 para. (2) lit. a) of Law No. 252/2023.

Issue 3. Unjustified wealth in 2020.

62. According to the information available to the Panel, on 8 July 2020, the subject made a cash payment of 312,486 MDL to "Exfactor Grup" SRL.

63. In his reply to the second round of questions (R2-Q16), the subject explained that this sum represented a refundable deposit guarantee intended to reserve an apartment pending confirmation of his eligibility under the Prima Casă Program. He stated that the deposit guarantee was fully reimbursed on 5 August 2020.

64. The subject further indicated that, because neither he nor his wife possessed sufficient funds at that time, he approached his father-in-law, who agreed to provide the money. As the father-in-law travelled abroad frequently for work, he allegedly handed the cash to the subject to execute the payment. According to the subject, following the reimbursement of the deposit on 5 August 2020, he returned the funds to his father-in-law within several days.

65. At the Panel's request, the real-estate company formally confirmed that the payment constituted a refundable deposit guarantee made by the subject, and that it was reimbursed in full on 5 August 2020 following the finalization of the eligibility and loan-approval procedures under the Prima Casă Program.

66. In the third round of questions (R3-Q4), the subject was asked to clarify the source of funds his father-in-law allegedly used for the 312,486 MDL loan, particularly considering that only two days later, on 10 July 2020, the father-in-law made a notarized donation of 201,000 MDL to the subject, which the latter duly declared to the NIA.

67. In reply, the subject stated that his father and mother-in-law have been officially employed since 2005 and 2007 respectively, that they maintained a modest lifestyle, and that over

time they managed to accumulate savings. He submitted employment and salary certificates in support.

68. The Panel examined the official income of the parents-in-law for the period 2012–July 2020, amounting to 714,438 MDL. For the same period, using the Consumption Expenditure of Population (CEP) indicators, their household expenditures would have reached at least 447,031 MDL (the Panel notes that real expenditures are likely to have been higher). Consequently, the maximum plausible savings for this period would not exceed 267,407 MDL. This amount is insufficient to plausibly finance both the alleged loan of 312,486 MDL on 8 July 2020 and the donation of 201,000 MDL on 10 July 2020.
69. In the fourth round of questions (R4-Q1), the subject argued that his parents-in-law had accumulated savings over their entire lifetime and provided additional data on their official income (salaries and social-insurance benefits) since 2007.
70. He also informed the Panel (for the first time) that his wife and mother-in-law had worked for a short period in the Netherlands in 2018, earning a combined official income of 5,087 EUR. He submitted salary documents (4,919 EUR for the wife; 1,168 EUR for the mother-in-law) and a rental agreement showing a weekly rent of 91 EUR. The subject additionally referred to allegedly informal income earned by his father-in-law in Russia in 2002.
71. The Panel also analyzed their official income for the period 2007–2011 (194,401 MDL) against CEP-based expenditures (272,876 MDL) and concluded that their official income during that period was insufficient even to cover basic living costs, let alone to accumulate savings.
72. With regard to the income earned in the Netherlands in 2018, the Panel considers it implausible that the entirety of the wife's earnings would have been set aside to augment the savings of her parents, particularly given the concurrent living expenses abroad.
73. As for the alleged informal earnings of the subject's father-in-law in Russia in 2002, the subject provided no documentation or indication of the amounts concerned. Given the remoteness of that period and the absence of verifiable evidence, reliance on such income as a relevant source of funds for a 2020 transaction is considered implausible.
74. In light of the above, the Panel finds that the official and alleged income of the parents-in-law was insufficient to justify both the 312,486 MDL loan on 8 July 2020 and the 201,000 MDL donation on 10 July 2020.
75. The Panel therefore assessed the maximum cash available within the subject's household as of 8 July 2020. Based on ATM withdrawals (233,850 MDL) and cash replenishments (53,478 MDL), the subject's net available cash amounted to 180,372 MDL. After deducting household CEP expenditures (44,509 MDL) and rent payments (17,767 MDL), the maximum remaining amount totaled 118,096 MDL. As the subject confirmed that he had no other sources of funds, this analysis does not support the plausibility of his claimed ability to finance the July 2020 transactions.

76. The subject confirmed that he had no other sources of funds beyond those allegedly provided by his parents-in-law.
77. Accordingly, the Panel estimates an unexplained negative balance of 194,390 MDL for the period 1 January - 8 July 2020.
78. 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 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, which is 234,00 MDL.
79. In view of the above, the Panel concludes that the subject did not demonstrate a lawful, sufficient, and plausible source of funds for the transactions carried out in July 2020. These inconsistencies raised doubts regarding the subject's compliance with the financial integrity criterion under art. 11 para. (3) of Law No. 252/2023. Nevertheless, the Panel notes that the resulting negative balance remains below the 234,000 MDL statutory threshold.
80. Since the Panel notes that the resulting negative balance for 2020 remains below the 234,000 MDL statutory threshold, this issue is considered mitigated after the hearing. In light of the above, the Panel must conclude that in relation to the issue of donations from parents in 2012 – 2014, the subject meets the criterion of ethical integrity under art. 11 para. (2) lit. a) and of financial integrity under art. 11 para. (3) lit. b) of Law No. 252/2023.

Issue 4. Handling of a criminal case concerning against Sinilga Școlnic and Pavel Todica.

81. On 12 June 2024, the Commission received a complaint from Pavel Todica, a defendant in a criminal case still pending at the time before the court of first instance. Pavel Todica, who at the relevant time served as Deputy Chief of the Ciocana Police Inspectorate, had been indicted together with Sinilga Școlnic, the Head of the Ciocana District Administration, for preparation to commit passive corruption. In his complaint, he alleged that the subject, together with other prosecutors, had handled the case in an unlawful and improper manner. According to the complainant, the subject had conducted a biased investigation, tampered with evidence, and failed to act on several defense motions. To substantiate his allegations, Todica submitted copies of the criminal investigation files transmitted by the prosecution to the court, as well as a covert audio-video recording of discussions between himself and Sinilga Școlnic, which he alleged had been used by the prosecution as incriminating evidence.
82. According to the information available to the Panel, the criminal proceedings in question were initiated on 23 November 2020 by the NAC. The investigation was opened based on information submitted on 13 November 2020 by a former employee of the Ciocana District Administration, who alleged a corruption scheme involving Sinilga Școlnic, Pavel Todica, police officer Dan Cătălin, and several dozen small business owners seeking to extend their

authorizations to operate in the Ciocana District. A prosecutor of the APO was designated to conduct the investigation.

83. On 1 April 2021, 7 June 2021, and 8 June 2021 respectively, Sinilga Școlnic, Dan Cătălin, and Pavel Todica were charged with passive corruption. The charges were supported, among other evidence, by covert audio-video recordings of conversations between Todica and Școlnic in her office.
84. On 13 July 2021, the General Prosecutor removed the lead prosecutor from the case, noting that the charges against both Dan Cătălin and Pavel Todica were vague and insufficiently substantiated, and that their formulation posed risks to the fairness of the proceedings.
85. On 14 July 2021, the case was reassigned to another APO prosecutor. This prosecutor heard nine of the businesspersons who were allegedly the victims of the attempted bribery scheme attributed to Școlnic, Todica, and Cătălin. None of the witnesses confirmed the corruption allegations. On 22 September 2021, the prosecutor discontinued the criminal proceedings, concluding that there was insufficient evidence to sustain the charges of passive corruption.
86. On 31 May 2022, the Interim Chief Prosecutor of the APO annulled the discontinuation order and resumed the criminal investigation. As grounds for this decision, she noted serious deficiencies in the annulled order and concluded that the prosecutor who had discontinued the case, failed to adequately consider the Criminal Code provision on incriminating preparation to commit a crime. On the same date, the subject was assigned to lead the resumed investigation.
87. On 9 June 2022, the subject heard Dan Cătălin as a witness. He did not admit any involvement in the corruption allegations concerning Școlnic or Todica. On the same day, the subject formally charged both Sinilga Școlnic and Pavel Todica with preparation to commit passive corruption. On 22 June 2022, the case was transmitted to the Chisinau District Court for examination.
88. On 26 September 2025, the Chisinau District Court issued a judgment, acquitting both defendants. The court identified discrepancies between the transcripts submitted by the prosecution and the actual content of the covert audio-video recordings. In addition, at the request of the defense, fourteen persons associated with the businesses allegedly targeted for the bribe requests were heard. None essentially confirmed the accusations. The Panel notes that some of these witnesses had also been heard during the earlier stage of the investigation, before the case was discontinued, and had provided similar statements.
89. Hence, the Panel's task was strictly limited to determining whether the subject's conduct raises concerns related to professional ethics under art. 11 para. (2) lit. (a) of Law No. 252/2023. The vetting procedure does not empower the Panel to reassess the criminal responsibility of the accused, reconstruct the full evidentiary record, or substitute its own view for that of the competent courts. The Panel is not a review instance for criminal cases and cannot resolve factual disputes or interpret contested evidence. Its mandate is confined

to identifying credible and verifiable indicators of arbitrary conduct or serious deviations from professional ethics by the evaluated subjects.

90. In the fifth round of written questions, the Panel asked the subject to clarify the discrepancies that the trial court claimed to have found between the transcripts and the covert audio-video recordings, as well as the fact that certain witnesses had not been heard during the investigation stage. The subject stated that, after taking over the case, he reviewed all available materials and did not observe inconsistencies between the transcripts and the audio-video recordings. He described the trial court's observations as subjective and insufficiently explained, noting that the judgment did not precisely identify the alleged discrepancies. He also stated that, according to the prosecutor who represented the prosecution at trial, the defense did not raise objections in court concerning inaccuracies in the transcripts.
91. During the hearing, the subject reiterated the response he gave in the fifth round of written questions. He added that the audio-video materials submitted by Pavel Todica to the Commission represented only a very small portion of the full recordings in the case (approximately 10 minutes out of more than an hour). He argued that isolated fragments cannot reflect the broader evidentiary context and that such partial excerpts may create a distorted impression. He further stated that the audio-video recordings had been subjected to judicial control, having been verified by an investigative judge and compared with the corresponding transcripts.
92. He also emphasized that, in his view, in cases concerning the preparation to commit bribery, it is not necessary to establish specific amounts intended to be paid, unlike in cases of consummated bribery. Accordingly, the amounts discussed were not, in his assessment, essential to his prosecution strategy.
93. Also, the subject explained that upon the resumption of the investigation, he considered it no longer appropriate to hear a number of witnesses, given the procedural stage reached. The subject further expressed the view that these witnesses may have been influenced by the accused, whom he described as influential officials, not to provide truthful statements, both during the investigation and subsequently before the court. In addition, the subject indicated that parts of the covert audio-video recordings had been leaked to the press, which, in his assessment, may have prejudiced the position taken by the witnesses.
94. Finally, the subject stated that, in his view, the accused may have become aware of the covert investigative measures at an early stage, which, in his assessment, could have affected their subsequent conduct and statements of potential witnesses.
95. The Panel notes that, although the complainant submitted an audio-video fragment, it lacks verification of authenticity. Moreover, the court of first instance did not specify the exact nature or extent of the discrepancies it identified, which limits the Panel's ability to assess its relevance.

96. The transcript submitted by the complainant reads: “*He was, he goes... Dan Cătălin and the local cops also were at the premises, 100 EUR, the local cops 7,000 MDL... From what is passed to the district administration...*”

97. However, in the corresponding portion of the audio recording provided to the Panel, after the phrase “*Dan Cătălin and the local cops also were at the premises,*” the recording becomes unintelligible. No reference to “100 EUR,” “7,000 MDL,” or “*what is passed to the district administration*” was heard by the Panel in the audio fragment made available to the Commission.

98. Because the recording is short, incomplete, and partially unintelligible, and because its authenticity cannot be verified, the Panel cannot rely on it to draw conclusions about the subject’s conduct.

99. The Panel considers that, from the perspective of prosecutorial diligence, as outlined in art. 6.5.1 of the Prosecutor Code of Ethics, it might have been preferable for the subject to hear all potentially relevant witnesses (who were subsequently heard by the court) and to seek further clarification regarding the amounts allegedly mentioned in the covert audio-video recordings. That said, the vetting procedure under Law No. 252/2023 is not designed to review the soundness or professionalism level of investigative tactics carried out by the subjects. In the present case, the subject assumed responsibility for a resumed investigation and mostly relied on evidence that had been subjected to judicial control.

100. The Panel has not identified credible indications of manipulation of evidence or its conscious disregard. Accordingly, when assessed cumulatively and in light of the high threshold applicable under art. 11 para. (2) lit. a) of Law No. 252/2023, the Panel concludes that the subject’s conduct does not amount to a grave ethical violation.

VI. Conclusion

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

VII. Further Action and Publication

102. 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.

103. 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.

104. 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).

105. Pursuant to art. 17 para (2) of Law No. 252/2023, this evaluation report was approved unanimously by the evaluation panel on 18 December 2025 and signed by a Panel member.

106. Done in English and Romanian.

Signature:



Nadejda HRIPTIEVSCHI

Panel member designated on 18 December 2025 by the Chairperson of the Prosecutor Vetting Commission, by email, to sign the evaluation report in accordance with art. 29 para. (6) of the Commission Rules