

**Evaluation Report No. 20 of 5 January 2026  
on Gheorghe IAPĂRĂ, 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 15 December 2025 and approved this report on 5 January 2026.

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

*Virginia MORARU – Panel’s Chair*  
*Cornel LEBEDINSCHI*  
*Irmantas MIKELIONIS*

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

### **I. Introduction**

1. This report concerns the subject of evaluation Gheorghe IAPĂRĂ, 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 Gheorghe IAPĂRĂ meets the ethical and financial integrity criteria identified in Law No. 252/2023.

### **II. Subject of the Evaluation**

4. Gheorghe IAPĂRĂ (“the subject”) was appointed as a prosecutor at the Florești District Prosecutor’s Office on 15 November 2011. Between 2 October 2019 and 29 November 2022, he was delegated to the APO. As of 9 December 2022, the subject was transferred to the APO, where he currently serves.

### **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.<sup>1</sup> 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.
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

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

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. Gheorghe IAPĂRĂ 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) 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 13 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, composed of 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.
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 (*unjustified wealth*) and 2014 - 2023 (*tax irregularities*). The evaluation period for the ethical criterion 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 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 9 September 2025, the Panel asked the subject to provide additional information by 18 September 2025 to clarify certain matters (“first round of questions”). The subject provided answers and documents within the set deadline – on 18 September 2025.
27. On 10 November 2025, the Panel asked the subject to provide additional information by 17 November 2025 to clarify certain matters (“second round of questions”). The subject provided answers and documents within the set deadline – on 17 November 2025.
28. On 4 December 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 public hearing on 15 December 2025. The subject was informed that he could request access to the evaluation materials.
29. Following the subject’s request, on 9 December 2025, the subject was granted access to the evaluation materials according to art. 16 para. (5) lit. c) of Law No. 252/2023.
30. On 15 December 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 Commission’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 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. The subject's potential beneficial ownership of three vehicles.*

34. The Panel examined whether the subject was the beneficial owner of three vehicles registered in the name of his brother-in-law: a 2003 Volkswagen Golf, a 2011 Volkswagen Passat, and a 2006 BMW 525D. The analysis focused on the manner in which these vehicles were used, the subject's financial involvement, and the brother-in-law's financial capacity to acquire them.
35. As regards the 2003 Volkswagen Golf, the vehicle was registered in the name of the brother-in-law on 25 January 2018 and was alienated on 23 December 2021. In the first round of written questions (R1Q34), the subject denied that he or his family used this vehicle. No evidence was identified showing regular or exclusive use of this vehicle by the subject or his wife.
36. However, insurance RCAI No. 004061488 of 22 May 2018 shows that the subject's wife was listed as the insured person under the mandatory civil liability insurance policy for the period 22 May 2018 – 22 May 2019. The subject explained this discrepancy by referring to an administrative error.
37. As regards the 2011 Volkswagen Passat, the vehicle was registered in the name of the brother-in-law on 22 July 2020 and was alienated on 9 February 2023. The subject declared possession of this vehicle in his annual declarations of assets and personal interests ("annual declarations") for the period 2020 - 2022. In the annual declarations for 2021 and 2022, he indicated a value of 160,000 MDL.
38. The Panel notes that, in 2020, the market value of vehicles of similar make, model and manufacturing year was higher, ranging between 197,414 MDL and 236,896 MDL.
39. In both rounds of written questions (R1Q32 and R2Q5), the subject stated that he incurred no expenditure in relation to this vehicle. He maintained that the brother-in-law, as the owner, covered all related costs, including acquisition, customs clearance, registration, and maintenance.
40. The Panel notes the information that the brother-in-law imported the vehicle is confirmed by the records in the Customs Service database, according to which the vehicle was imported by him on 1 July 2020, with the customs value of 120,000 MDL, and paid import duties of 59,654 MDL.
41. As regards the 2006 BMW 525D, the vehicle was owned by the brother-in-law from 23 December 2021 and was sold on 18 April 2025. In December 2023, the subject's wife used this vehicle for a short trip to Romania.

42. In the first round of written questions (R1Q33), the subject explained that the BMW was chosen because it already had valid “Carte Verte” insurance, which allowed the family to avoid the additional cost of insuring their own vehicle for that trip. He also stated that the vehicle was otherwise used only sporadically.
43. The Panel further examined the financial capacity of the brother-in-law to acquire and maintain the vehicles registered in his name. In this respect, the Panel notes that during the relevant period, the brother-in-law was employed in Denmark in the construction sector, including with Niels Frost Anlæg and Skanvel ApS. According to Danish tax information, his annual income increased over time, amounting to 76,945 DKK (approximately 10,312 EUR) in 2018, 72,000 DKK (approximately 9,637 EUR) in 2019, 99,600 DKK (approximately 13,375 EUR) in 2020, and 129,650 DKK (approximately 17,428 EUR) in 2021. These figures represent gross salary amounts, prior to the deduction of mandatory contributions.
44. The Panel notes that for the brother-in-law, the Moldovan STS database shows no income or retained tax for the fiscal years 2019 and 2020. The Panel therefore assessed the brother-in-law’s financial capacity on the basis of the foreign income information available. This income level is relevant for assessing his financial ability to acquire used vehicles. In this context, the Panel notes that the vehicles in question were second-hand vehicles, and their acquisition is not incompatible with the level of income earned by the brother-in-law in 2018-2021.
45. The Panel also examined the brother-in-law’s involvement in certain family-related financial arrangements. In particular, the Volkswagen Passat was involved in two road accidents, in May 2021 and November 2022. Although the brother-in-law was the registered owner of the vehicle, the insurance compensation payments, amounting to 7,600 MDL and 5,260 MDL, were transferred directly into the subject’s bank account. Both during the first and the second round of written questions (R1Q12, R2Q5), the subject explained that these amounts were used to cover repair costs, which were not otherwise documented.
46. The Panel considers that the receipt of insurance compensation on the subject for damages to a vehicle owned by another person is relevant. This arrangement might suggest a high degree of integration of the vehicle into the subject’s personal financial sphere. At the same time, the Panel notes that the amounts involved were limited and corresponded to specific, identifiable incidents. Hence, the Panel does not consider this element sufficient, on its own, to establish beneficial ownership.
47. The Panel further notes that the brother-in-law was involved in delivering two vehicles for the subject’s family (Renault Kadjar and Renault Scenic) from Denmark and in purchasing missing rear seats for both vehicles, at costs of approximately 300 EUR and 200 EUR, respectively, as well as approximately 1,000 EUR for delivery. These actions demonstrate that the brother-in-law had a degree of involvement in the subject’s family logistics and support.

48. The Panel acknowledges that, taken together, the repeated use of some of the vehicles owned by the brother-in-law, the receipt of insurance compensation by the subject, and the brother-in-law's practical involvement in vehicle-related matters raised certain doubts. These elements justified an examination of whether the brother-in-law acted merely as a formal title holder for assets effectively controlled by the subject.
49. However, the Panel attaches significant weight to the broader factual context. Throughout the 2018 - 2023 period, the subject and his wife owned several vehicles in their own name, including a Skoda Octavia until late 2020, a Toyota Urban Cruiser between 2020 and 2022, two Renault vehicles between 2022 and 2023, and a Volkswagen Touran acquired in late 2023. This pattern weakens the hypothesis of concealed ownership.
50. The Panel also considers it relevant that the subject consistently disclosed possession of the Volkswagen Passat in his annual declarations.
51. In assessing beneficial ownership, occasional or even repeated use of an asset, family assistance, or limited financial intermingling does not automatically amount to beneficial ownership. A finding of beneficial ownership requires strong indicators of effective control and exclusive use. In the present case, while certain elements raised concerns, the available evidence does not establish that threshold.
52. In light of the above, the Panel finds that the doubts regarding the issue of the subject's potential beneficial ownership of three vehicles were mitigated by the subject during the rounds of written questions. Therefore, the Panel concludes that the subject meets the criteria of ethical and financial integrity under art. 11 paras. (2) - (3) of Law No. 252/2023.

*Issue 2. Plausibility of monetary donations received by the subject and his wife at their wedding in 2018.*

53. This issue arose from the subject's annual declaration for 2018, in which he declared the receipt of substantial monetary funds following his wedding in the same year. Given the significant volume of cash declared, originating from wedding donations and received in multiple currencies, the Panel considered it necessary to assess the plausibility of this source of funds under the financial integrity criterion set out in Law No. 252/2023, as provided for in art. 11 para. (4) lit. d) and f) - in the process of assessing financial integrity, the Commission may verify [...] the sources of income of the subject of the evaluation and, where applicable, of the persons referred to in para. (5), as well as whether there are donations in which the subject of the evaluation or the person specified in para. (5) has the status of donee or donor.
54. The subject stated that his wedding took place on 2 June 2018 at a restaurant in Bălți municipality and was attended by approximately 230 - 240 guests. According to the annual declaration for 2018, the wedding generated monetary donations amounting to the equivalent of approximately 1,042,385 MDL, consisting of 268,000 MDL, 33,100 EUR, 5,650 USD, and 1,000 GBP.

55. In response to the first round of written questions (R1Q8), the subject explained that the donations were received in cash, in line with customary wedding practices. No donor lists were kept. At the same time, the subject recalled the specific contributions of a number of key donors, primarily close family members, godparents, and relatives established abroad. These recalled donations amount to 17,500 EUR, 2,500 USD and 1,000 GBP, which amounts to the approximative equivalent of 411,810 MDL, attributable to 24 identified persons.
56. The Panel notes that wedding donations may constitute a plausible (and lawful) source of funds even in the absence of formal documentation, but only where the explanation is credible and not contradicted by evidence.
57. The Panel observes that monetary gifts at weddings are a common and socially accepted practice in the Republic of Moldova. Nevertheless, this does not dispel the need for a careful assessment, particularly where the amounts declared are high and evidence is largely indirect.
58. The aggregate amount declared exceeds one million MDL in equivalent value. The lack of documentation makes it impossible to verify with precision the total amount collected.
59. The Panel notes that a significant portion of the total amount was attributed to identified close relatives, godparents, and family members established abroad.
60. The recalled key donations account for less than half of the total amount declared. The remaining portion, which cannot be linked to specific donors, relies on estimates. After deducting the identified key donations, the residual amount of approximately 630,574 MDL (approximately 31,768 EUR) corresponds, depending on the total number of guests, to an average donation of roughly 2,900 - 3,100 MDL (approximately 146 - 156 EUR) per remaining guest. While this range is not manifestly unrealistic in the context of a large wedding in 2018, it remains a statistical approximation.
61. The Panel verified the financial capacity of the subject's mother and parents-in-law to grant donations of EUR 5,000 each, as declared by the subject, particularly in light of the fact that, in reply to the first round of written questions (R1Q8), the subject stated that the wedding expenses were largely covered by the parents: 80,000 MDL by the parents-in-law and 40,000 MDL by the subject's mother.
62. In this context, the Panel established that the subject's mother recorded official income amounting to 1,015,304 MDL during the period 2012 - 2018, while her estimated consumption expenditures ("CEP") for the same period totaled 625,399 MDL. Based on the Panel's verifications, no significant additional expenditures were identified.
63. As regards the parents-in-law, the Panel established that the total official income earned both in the Republic of Moldova and abroad was 937,609 MDL in the period 2012 - 2018, while their estimated CEP for the same period totaled 533,975 MDL, which makes

plausible the subject's explanations on the wedding-related contributions received from them, both in the form of monetary donations and coverage of wedding expenses.

64. The Panel also examined the wedding expenses incurred for the organization of the wedding event. According to the subject's reply to the first round of written questions (R1Q8), the costs for the venue and catering were estimated at approximately 160,000 MDL, partially covered by the parents (as indicated in para. 61 above) and by the subject and his wife (40,000 MDL). The subject also provided information regarding certain customary ancillary services, which were paid from the wedding donations received.
65. The subject submitted a copy of a contract for the provision of wedding services, concluded on 31 August 2017 between the subject and "Vadiserv Electronic" SRL, concerning the rental of the wedding venue and catering services. According to the contract, the venue was reserved for 200 guests, with catering prices starting from 550 MDL per person, depending on the menu selected at a later stage. The Panel undertook all reasonable efforts to contact the service provider directly; however, as the company was liquidated in 2018, this was not possible.
66. The Panel also takes note of a wedding photo submitted by the subject showing a part of a guest list organized by tables, with around 100 couples' names visible. This photo provides contextual support for the scale of the event, but it does not allow the Panel to verify the identity of all guests or the amounts contributed by them.
67. The Panel further observes that the funds were subsequently used for the acquisition of the family 71,3 sq. m. apartment in Chişinău municipality, Ciocana District, with documented payments made in total amount of 824,844 MDL in the period December 2018 – February 2019 to the developer. This fact lends consistency to the subject's narrative, but it does not eliminate the uncertainties surrounding the donations.
68. In sum, the explanation regarding the wedding donations contains certain uncertainties, which arose from the lack of documentary evidence. Nevertheless, these uncertainties are not sufficiently serious to cast doubt on the overall plausibility of the subject's explanation. The Panel did not identify elements suggesting fabrication or financial enrichment incompatible with the subject's lawful income.
69. In light of the above, while the Panel retains a degree of doubt as to the exact amount of the wedding donations, it must conclude that the subject meets the criterion of financial integrity under art. 11 para. (3) lit. a) of Law No. 252/2023.

## **VI. Conclusion**

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

## **VII. Further Action and Publication**

71. 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.
72. 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.
73. 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).
74. Pursuant to art. 17 para (2) of Law No. 252/2023, this evaluation report was approved unanimously by the evaluation panel on 5 January 2026 and signed by the Vice-Chairperson of the Commission.
75. Done in English and Romanian.

Signature:

Virginia MORARU  
Vice-Chairperson  
Prosecutor Vetting Commission