PROSECUTOR VETTING COMMISSION

Evaluation Report No. 38 of 20 May 2026
on Ina FRUNZA-BARGAN, Deputy Chief of 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 3 April 2026 and approved this report on 20 May 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 Ina FRUNZA-BARGAN, Deputy Chief of 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 Ina FRUNZA-BARGAN meets the ethical and financial integrity criteria identified in Law No. 252/2023.

II. Subject of the Evaluation

4. Ina FRUNZA-BARGAN ("the subject") was appointed as a trainee prosecutor in the Anenii Noi District Prosecutor's Office on 18 April 2005, and as a prosecutor in the same office on 15 February 2006. On 15 September 2006, she was appointed as a prosecutor in the APO. As of 10 November 2025, she holds the position of Deputy Chief Prosecutor of 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. Ina FRUNZA-BARGAN 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 the provisions of art. 3 paras. (1) lit. e) and (3) of Law no. 252/2023.

19. On 24 May 2024, the Commission notified the subject of its initiation of evaluation and requested that she 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 her 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 she may request, in writing and at the earliest possible time, the recusal of members from the 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 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, 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. All information received was carefully screened for accuracy and relevance.

25. To the extent that issues were raised by the subject's five-year declaration, and ethics questionnaire and collected information, those issues were raised in written questions with the subject.

26. On 17 November 2025, the Panel asked the subject to provide additional information by 1 December 2025 to clarify certain matters ("the first round of written questions"). The subject provided answers and documents within the set deadline, on 1 December 2025.

27. On 19 January 2026, the Panel asked the subject to provide additional information by 27 January 2026 to clarify certain matters ("the second round of written questions"). The subject provided answers and documents within the set deadline, on 27 January 2026.

28. On 23 February 2026, the Panel asked the subject to provide additional information by 2 March 2026 to clarify certain matters ("the third round of written questions"). The subject provided answers and documents within the set deadline, on 2 March 2026.

29. On 16 March 2026, the Panel asked the subject to provide additional information by 23 March 2026 to clarify certain matters ("the fourth round of written questions"). The subject provided answers and documents within the set deadline, on 18 March 2026.

30. On 23 March 2026, the Panel notified the subject that it had not identified in its evaluation any areas of doubt about the subject's compliance with the integrity criteria and invited the subject to attend a public hearing on 3 April 2026 pursuant to art. 16 para. (2) of Law No. 252/2023. The subject was also informed about her rights under art. 16 para. (5) of Law No. 252/2023 and that she could request access to the evaluation materials.

31. Following the subject's request, on 27 March 2026, she was granted access to the evaluation materials in accordance with art. 16 para. (5) lit. c) of Law No. 252/2023.

32. On 3 April 2026, the subject participated in a public hearing before the Panel. At the hearing, the subject reaffirmed the accuracy of her answers in the five-year declaration and ethics questionnaire, and stated that she had no corrections or additions to the answers 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 analyzed and, where necessary, sought further clarifications from the subject on the following matters:

- *Plausibility of the parents' financial capacity to provide multiple donations and an interest-free loan to the subject's household.*
- *Acquisition of a vehicle in 2022 and the source of funds used for the purchase.*
- *Non-payment of capital gains taxes.*

35. These issues were mitigated before 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. Plausibility of the parents' financial capacity to provide multiple donations and an interest-free loan to the subject's household

36. According to the subject's annual declarations submitted to the National Integrity Commission ("NIC") and later to the NIA, during 2013 – 2016, the subject declared several cash donations from her mother, in the total amount of 14,500 EUR: 3,500 EUR in 2013, 3,000 EUR in 2014, 2,000 EUR in 2015, and 6,000 EUR in 2016. In addition, cadastral information and the subject's declarations show that, in 2015, the subject received by donation from her father an apartment of 53.3 sq. m. located in Chisinau, on I. Street. The apartment had been purchased by the father in 2014 for 30,000 EUR and was later sold by the subject in 2021. Separately, in her annual declaration for 2017, the subject declared an interest-free loan of 10,000 EUR from her mother, with maturity in 2027. In addition, in reply to the written questions addressed by the Panel, the subject informed that her parents paid the tuition fees for her children in 2017 and 2018, in total amount of 93,191 MDL, as a financial support to her. The Panel therefore examined whether the subject's parents had sufficient financial capacity to provide this repeated support.

37. In R1Q15 – R1Q17 and R1Q19, the Panel asked the subject to explain the circumstances, method of transfer, use, and source of the cash donations declared as received from her mother in 2013, 2014, 2015, and 2016. The subject stated that, before her marriage, her parents had expressed their intention to support her with approximately 20,000 EUR for the acquisition of housing in installments. According to the subject, her mother then provided annual cash amounts intended mainly for apartment payments. The subject stated that the donations were received in cash, generally in one tranche, except for the 2016 donation, allegedly received in two tranches of 3,000 EUR each, at the beginning and toward the end of the year. She explained that the funds were either kept as cash savings at home or used toward apartment-related payments. As to the source, the subject stated that the money originated from her mother's work in Italy.

38. In R1Q20, the Panel asked the subject to clarify the purpose, terms, transfer method, use, repayment schedule, and source of funds for the 10,000 EUR interest-free loan declared in 2017. The subject stated that she borrowed the amount from her parents at the end of 2017 because she lacked sufficient funds for repairs to the apartment on M. Street, as well as for furniture and household appliances. She explained that the loan was based on a verbal agreement, was received in cash, carried no interest, and was to be repaid in full at the end of the agreed term. The subject did not provide a loan agreement, documents confirming the transfer, or documents confirming the subsequent expenditure of the funds, explaining that, due to the passage of time, she no longer had supporting documents for the furniture and household appliances. She indicated that the source of the loan was her parents' savings accumulated during 2003 – 2017, while her mother worked in Italy.

39. The Panel also examined the apartment located on I. Street, because it represented a substantial non-cash benefit transferred by the subject's parents to the subject. According to cadastral information, the apartment was purchased by the subject's father under a sale-purchase agreement of 13 November 2014, donated to the subject under a donation agreement of 26 August 2015, and sold by the subject under a sale-purchase agreement of 22 July 2021. In R1Q42, the Panel asked the subject to provide the relevant contracts and explain the source of funds used by her father for the 2014 acquisition.

40. In response to R1Q42, the subject stated that she could provide only the 2021 sale-purchase agreement. She explained that the original 2014 sale-purchase agreement had been submitted to the notary for the execution of the 2015 donation agreement, and that the 2015 donation agreement had later been submitted to the notary for the execution of the 2021 sale agreement. According to the subject, the earlier property documents remained with the notaries and were no longer in her or her parents' possession.

41. As regards the source of funds for the 2014 acquisition of the I. Street apartment by her father, the subject explained that the purchase was financed partly from the parents' joint savings, including funds held in deposit accounts, and partly from a 10,000 EUR loan contracted by her mother from a bank in Italy on 22 August 2014. She further explained that her mother had left the Republic of Moldova for Italy in 2003, initially worked there without a formal employment contract until 2005, and subsequently legalized her stay and formalized her employment. In support, the subject submitted deposit account statements, the 22 August 2014 Italian loan documents, and a certificate issued by the H. Mayor's Office confirming that the mother had been abroad since 2003.

42. The Panel further examines the subject's statement, made in response to R2Q21, that part of the cash savings she held at the end of 2011 were based on the donations received from her parents: 3,000 EUR received in 2009 at the wedding celebration, 1,500 EUR received in 2010 at the child's christening event celebration, plus an additional 10,000 EUR cash donation allegedly received from her mother in 2011. According to the subject, part of the 2011 donation was used for the first installment for the apartment on M. Street, while the remainder was kept in cash together with other savings.

43. Separately, the Panel examined banking information concerning persons close to the subject, because several accounts and short-term deposits appeared to be held in the name

of the subject's father. According to information obtained from financial institutions, these included, *inter alia*, a 17,000 EUR cash deposit opened in the father's name on 16 March 2013 (closed in 2014 prior to purchase of the apartment on I. Street by the subject's father), and a 100,000 MDL cash deposit opened in his name on 12 May 2016. The subject stated that the accounts opened in her father's name were funded from money earned by her mother through her work in Italy. She expressly denied that either she or her former husband had contributed directly or indirectly to these deposits. The Panel therefore treated the father's deposits as part of the broader question whether the parents' household had sufficient lawful capacity to accumulate savings and provide the support declared by the subject.

44. In the second round of written questions, the Panel further examined the parents' financial capacity to provide the support described above. Based on the subject's annual declarations, the documents submitted in response to R1Q42 concerning the mother's income from caregiving work in Italy, and the banking information concerning the parents' accounts, the Panel prepared a financial analysis for the parents for 2012 – 2018 (last year of donations declared by the subject from her parents). The preliminary analysis indicated negative yearly balances from 2013 onward, which required further clarification, in particular as to the parents' opening cash savings, undocumented income, pension income, and possible reductions in living expenses.

45. In R3Q2, the Panel therefore asked the subject to indicate the amount of cash savings allegedly held by her parents as of 31 December 2011, the manner in which those savings were held, and the supporting documents available. The Panel also asked the subject to explain the source of those savings and to specify whether, during 2012 – 2018, the parents had other income not reflected in the bank records or documents already provided, including undeclared salaried activity, informal work, rental income, agricultural income, business income, or other sources, with an indication of the approximate amounts, years, and method of receipt.

46. In response to R3Q2, the subject stated that, according to information provided by her parents, they held savings of approximately 30,000 EUR as of 31 December 2011. She explained that these savings derived from several sources: her mother's income from work in Italy beginning in 2003, including an alleged monthly salary of approximately 750 EUR during 2003 – 2005 while working as a caregiver; interest from bank deposits; the father's disability pension during 2001 – 2011; the mother's old-age pension beginning in 2010; and the father's old-age pension beginning in 2011. According to the subject, most of the savings were kept in cash at home, while a smaller part was placed in bank deposits that generated interest.

47. The subject further explained that the CNAS records available to her covered only the last ten years, starting from December 2015, and therefore did not fully reflect pension income received before that date. In support of the parents' alleged savings and income history, the subject referred to or submitted several categories of documents: materials concerning her mother's stay and activity in Italy during 2003 – 2005; service contracts, payment slips, and Italian social security records for the period after 2005; CNAS extracts for both parents; deposit account records and interest movements in the father's name; declarations of the

mother and of several persons who knew or worked with her in Italy; photographs from 2004 showing the mother's participation at a traditional festival in Italy; and a certificate from the H. Mayor's Office confirming that the mother had been abroad since 2003.

48. The Panel examined the Italian social security contribution statement submitted in respect of the subject's mother. The statement records contribution periods from 2005 through 2020, mainly in relation to domestic and family work, and indicates annual contribution weeks and corresponding remuneration amounts. This document is important because it confirms formal insured employment from July 2005 onward and establishes, at least for part of the period invoked by the subject, an objective basis for the mother's long-term work in Italy.

49. This statement reflects relatively modest annual earnings, not exceeding approximately 5,500 – 6,500 EUR gross per year (for example, 5,463 EUR in 2010, 5,664 EUR in 2011, 6,305 EUR in 2012, 6,479 EUR in 2013 etc.), which is more consistent with part-time employment than with stable full-time income. In the Italian domestic-work sector, including work registered as *collaboratore familiare*, annual remuneration in this range during the relevant period was more compatible with limited declared hours.

50. As regards the period 2012 – 2018, the subject stated in R3Q2 that the Panel's analysis should also take into account the old-age pensions of both parents, interest from bank deposits formed from savings accumulated in previous years, the 10,000 EUR bank loan contracted by her mother in Italy in 2014, and 5,000 EUR allegedly obtained from the sale in 2018 of a Toyota Prius manufactured in 2011.

51. The subject also identified the parents' main expenses during the same period, including the acquisition of the I. Street apartment in 2014, repayment of the 2014 Italian loan, the donations and loan granted to the subject, education expenses for the subject's daughter in 2017 – 2018, acquisition and resale in 2017 of a Nissan Note for 4,000 EUR, and subsequent acquisition of a Toyota Prius for 5,000 EUR.

52. Even after incorporating the documented salary income from Italy, pensions, deposit withdrawals, bank interest, the Italian loan, vehicle proceeds, and the adjusted expenses, the financial analysis for 2012 – 2018, continued to indicate a few negative yearly balances and an overall negative balance of approximately 73,227 MDL.

53. The main evidentiary limitation concerns the alleged 30,000 EUR cash savings as of 31 December 2011. The explanation does not seem implausible in light of the mother's long period of work abroad, the existence of some bank deposits, and the pension income invoked by the subject. However, because the subject stated that most of the savings were kept in cash at home, the amount cannot be verified directly through banking records.

54. The Panel also considered the subject's explanation that her mother performed additional informal domestic work in Italy. In particular, C.M. stated that she had worked together with the mother in Italy since 2004, confirmed that she had been employed for many years as a live-in caregiver, and stated that she used her daily free hours to perform additional cleaning and ironing work for neighbors and other local persons, paid in cash at

approximately 10 EUR per hour. T.R. similarly stated that the mother was permanently employed as a live-in caregiver and regularly performed additional paid work, such as cleaning, ironing, and care activities, during her free hours, for approximately 8 – 10 EUR per hour. V.C. and V.G. also stated that they had known the mother since the mid-2000s in Italy and that, in addition to her regular live-in caregiver work with food and accommodation provided, she frequently carried out additional paid domestic work for other families during daily free hours and weekends, remunerated in cash at approximately 8 – 10 EUR per hour. The subject's mother herself declared that she had worked in Italy since 2003 as a live-in domestic caregiver, received both regular salary and additional cash payments for extra hours, and that these earnings allowed her and her husband to provide sustained financial support and cash gifts to the subject.

55. These declarations are not contemporaneous financial records. They do not establish with sufficient precision the exact years, frequency, number of hours, annual amounts earned, or amounts actually retained. The Panel therefore did not include this alleged informal work in the updated financial analysis as established income, but treated it as a relevant contextual factor when assessing whether the residual discrepancy is capable, by itself, of generating serious doubts.

56. The Panel likewise considered the subject's objection to the use of Consumption Expenditures for Population[2] for two adults from a rural area. The subject argued that current living expenses should have been calculated only for one pensioner, namely her father, because her mother lived and worked in Italy as a live-in caregiver, allegedly with accommodation and food provided by the employer, and returned to the Republic of Moldova for approximately one month per year.

57. Subsidiarily, the subject stated that the parents maintained a rural household with agricultural land, an orchard, and domestic animals, including poultry, pigs, ducks, and rabbits, and that agricultural land donated by the grandfather to her brother in 2010 was leased to a cooperative in exchange for wheat and vegetable oil later used by the parents' household.

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[2] The Consumption Expenditures for Population (CEP) are determined and published on annual basis by the National Bureau of Statistics (NBS). The exact amount per subject of evaluation is calculated by the Commission using the NBS data, taking into account the number of family members, residence area (rural or urban). 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 - 2023 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 - 2023 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.

58. The Panel accepts that these circumstances may have reduced the parents' ordinary living expenses, especially food-related expenses in the Republic of Moldova and accommodation-related expenses in Italy. However, the available materials do not permit a precise annual quantification of those reductions. The Panel therefore did not replace the expenditure benchmark with unverified figures. At the same time, the Panel considers the live-in caregiver arrangement, the rural household resources, and the alleged in-kind agricultural benefits as mitigating contextual factors that may reasonably explain part of the remaining negative balance, but not as independently established monetary sources.

59. The Panel does not treat the updated financial analysis as establishing that the parents had no capacity to support the subject. Rather, it shows that the parents' capacity cannot be fully established on the basis of official and contemporaneously documented records alone. Thus, the residual negative balance of approximately 73,227 MDL for 2012 – 2018 remains relevant, but it must be assessed together with the corroborated long-term employment pattern in Italy. The records confirm insured employment from July 2005 onward and show modest declared remuneration, but they do not necessarily capture the full economic reality of the mother's work abroad, particularly in light of the long duration of her stay, the live-in caregiver arrangement alleged by several declarants, the reduced living expenses associated with such work, and the consistent statements regarding additional paid domestic work. The Panel therefore accepts that the mother's actual earning capacity was likely higher than the income strictly reflected in the formal documents and was thus sufficient for the donations to the subject

60. In light of the above, the Panel concludes that, its doubts regarding the plausibility of the parents' financial capacity to provide multiple donations and an interest-free loan to the subject's household have been mitigated.

Issue 2. Acquisition of a vehicle in 2022 and the source of funds used for the purchase

61. According to the information available to the Panel, a Toyota Avensis, model year 2014, was imported into the Republic of Moldova on 1 April 2017 by the subject's then-husband. The vehicle was registered in his name on 8 April 2017 and alienated on 25 April 2017. In her annual declaration for 2017, the subject reflected the sale of a Toyota Avensis by her husband for 40,000 MDL.

62. Customs data showed that the import value of the vehicle was 281,295 MDL, consisting of a customs value of 210,000 MDL and customs duties of 71,295 MDL. Given the difference between that amount and the declared alienation value of 40,000 MDL, the Panel asked the subject to explain the circumstances of the acquisition and alienation of the vehicle, the source of funds used for its import and registration, the reason for the short-term ownership, and the discrepancy between the two values (R1Q58; R1Q59).

63. In response, the subject stated that she had learned only during the evaluation that the vehicle she currently owns had previously been registered in the name of her then-husband. She explained that, [redacted] she could not obtain direct explanations from him and therefore requested a declaration from S.M., whom she

described as the purchaser and beneficiary of the vehicle. The subject stated that the 2017 transactions were performed by her then-husband, that she had not participated in the registration or sale-purchase procedures, had not held powers of attorney, and had declared the information communicated to her by him.

64. In his declaration submitted to the Panel, S.M. stated that, in 2017, he identified the Toyota Avensis abroad through an intermediary from Chisinau and paid approximately 9,500 EUR to that intermediary for the acquisition of the vehicle. He further stated that he gave the subject's then-husband approximately 2,000 EUR to cover transport, customs clearance, and import-related expenses. According to S.M., the subject's then-husband organized the import and initial registration of the vehicle in his own name and additionally paid, from his personal funds, certain import and registration-related costs in the total amount of approximately 40,000 MDL. S.M. explained that the amount of 40,000 MDL indicated in the alienation contract did not represent the economic value of the vehicle, but compensation for expenses borne by the subject's then-husband in connection with the import and registration.

65. The Panel considers that this explanation provides a possible factual rationale for the otherwise atypical 2017 transaction. It explains why a vehicle imported at a documented value of 281,295 MDL could have been transferred shortly thereafter for 40,000 MDL, namely because the formal amount reflected only the reimbursement of certain costs allegedly borne by the subject's then-husband, rather than the market value or full acquisition cost of the vehicle.

66. The same vehicle was later acquired by the subject on 20 June 2022 for 200,000 MDL and remained in her ownership and use. The Panel therefore asked the subject to confirm the circumstances of the 2022 acquisition, identify the seller and the legal form of transfer, explain who had used or possessed the vehicle between 2017 and 2022, confirm the transaction amount and method of payment, specify the source of funds used for the acquisition, and explain the difference between the 2017 declared alienation price of 40,000 MDL and the 2022 acquisition price of 200,000 MDL (R1Q60).

67. In response, the subject explained that, in the spring of 2022, she needed a vehicle, in particular for transporting her children. She stated that family friends S.M. and T.M. were aware of her situation and that S.M. informed her that he would discuss the matter with her then-husband, [redacted] The subject further stated that S.M. later informed her that the amount of 200,000 MDL for the vehicle had been paid to him by her then-husband.

68. In the second round of written questions, the Panel asked the subject to provide any documentary evidence confirming the payment of 200,000 MDL by her then-husband to S.M. and to request from S.M. any documents confirming that he had effectively received that amount (R2Q13).

69. In response, the subject submitted the declaration of S.M. and a bank statement confirming that money received as a result of the alienation of the vehicle was deposited into S.M.'s bank account. In his declaration, S.M. stated that the amount of 200,000 MDL was paid

fully in cash by the subject's then-husband and that, subsequently, on 5 July 2022, he deposited the amount into his account opened with BC "V" SA.

70. The Panel notes that S.M.'s declaration and the bank deposit evidence support the subject's explanation that S.M. received 200,000 MDL in connection with the 2022 alienation of the Toyota Avensis. However, the evidence does not independently document the alleged cash flow from the subject's then-husband to S.M. through banking records, payment orders, or contemporaneous receipts.

71. The Panel also asked the subject to explain why, in her annual declarations for 2022 and 2023, she declared the Toyota Avensis as property with a value of 200,000 MDL, without indicating the payment as a gift, benefit, donation, or another form of advantage, given that she had explained in R1Q60 that she had not personally paid this amount and that the price had been covered by her then-husband (R2Q14).

72. In response, the subject explained that, when completing her annual declarations for 2022 and 2023, she acted according to her understanding of the declaration obligations under Law No. 133/2016. She stated that the Toyota Avensis was in her ownership and therefore she declared it as an asset held by her, indicating the value of 200,000 MDL as the market value at the time of acquisition. [redacted] According to the subject, she considered that the decisive elements for declaration purposes were the registered ownership over the asset and the fact that the marriage had not yet been dissolved, especially since, in her view, the asset would form part of the division of marital property.

73. The Panel further asked the subject to clarify an inconsistency between her answer to R1Q58, where she stated that she had learned only during the evaluation that the vehicle had previously been registered in her then-husband's name, and her 2017 declaration, where she had expressly included the entry "Sale of Toyota Avensis – 40,000 MDL" (R2Q15).

74. In response, the subject explained that the 2017 entry was made exclusively on the basis of general verbal information provided by her then-husband. She stated that she had not been a party to the sale transaction, had not participated in preparing the documents, and had not been presented with supporting documents concerning the registration or transfer of the vehicle. According to the subject, the declaration reflected only the existence of the sale operation and the amount obtained, without legal details concerning the identification of the asset or the registered owner. The Panel notes that this statement seems plausible in the light of the multiple vehicle transactions performed by her ex-husband.

75. The Panel also examined the use and custody of the vehicle before its registration in the subject's name in 2022. Official data of the MIA identified two traffic violations involving the vehicle during 2017 – 2022: one committed by S.M. on 11 August 2021 and one committed by P.I. on 18 June 2022. The Panel therefore asked the subject to explain the relationship with these persons, the legal basis on which they drove the vehicle, who paid

the fines, and whether the vehicle had generated any income for the household during 2017 – 2022 (R1Q61; R2Q16).

76. In response, the subject stated that S.M. was a family friend and that her former husband had known him since childhood. As regards P.I., she stated that she had known him for several years, that their relationship was strictly personal, and that there were no patrimonial or professional relations between them. She explained that P.I.'s involvement in June 2022 was limited to the temporary custody and transmission of the vehicle and documents before the registration of the vehicle in her name. P.I. submitted a declaration generally consistent with this explanation and confirmed that he personally paid the fine for the traffic violation of 18 June 2022, without reimbursement from the subject, her family, or her former husband.

77. The Panel considers that the explanations provided in R2Q16 and the declaration of P.I. sufficiently clarify the limited relevance of P.I.'s involvement. At the same time, these explanations do not affect the central question for the purposes of financial integrity, namely whether the 2022 acquisition generated unjustified wealth.

78. Although the subject stated that the 200,000 MDL was paid by her then-husband and although S.M. confirmed that he received this amount in cash from him, the vehicle was acquired in the subject's name and remained in her ownership and use. [redacted] Therefore, the formal continuation of the marriage did not, by itself, remove the relevance of examining the acquisition as an asset economically attributable to the subject.

79. [redacted]

80. Thus, for the purposes of the financial analysis, the Panel attributed the full 200,000 MDL acquisition cost to the subject in 2022. Even under this approach, the acquisition of the Toyota Avensis does not generate unjustified wealth within the meaning of art. 11 para. (3) lit. a) of Law No. 252/2023.

81. In light of the above, the Panel considers that the Toyota Avensis transaction in 2022 does not establish serious doubts regarding the subject's financial integrity under art. 11 para. (3) lit. a) of Law No. 252/2023.

Issue 3. Non-payment of capital gains taxes

82. The Panel examined several vehicle transactions involving the subject's former husband, during the period in which the spouses still formed a common household, i.e. until the end of 2019.

83. The Panel identified a recurring pattern as regards the vehicles acquired, imported and / or alienated by the subject's then husband in the period 2012 - 2019. The values reflected in the subject's annual declarations were, in several cases, lower than the customs value, customs duties, total import cost, or market value of the vehicles. Some vehicles were also alienated shortly after import or after a relatively short period of ownership, without transaction-specific documents or explanations supporting the declared price. No capital gains tax has been paid by the subject's husband in relation to the alienation of these vehicles.

84. The Panel therefore asked the subject, in several rounds of written questions, to clarify the acquisition and alienation circumstances, the source of funds used, the actual sale prices, the identity and possible affiliation of buyers or intermediaries, the condition of the vehicles, the existence of any repairs or defects, and the fiscal treatment of the transactions.

85. In response, the subject consistently stated that she had not personally imported movable goods during the relevant period, had not been a party to her then-husband's vehicle transactions, had not participated in registration or sale-purchase procedures, had not held powers of attorney, and had relied in her annual declarations on verbal information provided by him. She further explained that, [redacted] she could not obtain additional details or documents. According to the subject, her former husband purchased second-hand vehicles from abroad, sometimes damaged because of their lower price, repaired them, and later sold them, including in some cases with remaining defects.

86. The Panel first examined the Škoda Roomster, model year 2008. According to Access-Web and Customs Service data, the vehicle was imported by the subject's then-husband on 17 December 2016, registered in his name on 20 December 2016, and alienated on 4 March 2017. In the subject's annual declaration for 2016, the acquisition value was reflected as 44,500 MDL, while in the annual declaration for 2017 the alienation value was reflected as 45,000 MDL. However, the customs value was 60,000 MDL and customs duties amounted to 18,565 MDL, resulting in a total import cost of 78,565 MDL. The available market benchmark indicated an approximate value of 62,500 MDL.

87. In the first round of written questions, the Panel asked the subject to provide details concerning the acquisition and alienation of the Škoda Roomster, including the source of funds used, the actual price paid and received, and any supporting documents (R1Q56 – R1Q57). The subject did not provide transaction-specific documents or a concrete explanation regarding this vehicle. Instead, she reiterated that she had not been involved in her then-husband's vehicle transactions and had relied on the information verbally communicated by him for purposes of her annual declarations.

88. Since the first-round response did not clarify the economic substance of the transaction, the Panel reiterated and consolidated the request in the second round of written questions (R2Q6). In response, the subject stated that the annual declaration for 2016 indicated an acquisition value of 44,500 MDL. In the fourth round of written questions, the Panel again addressed the total import cost of the Škoda Roomster (R4Q4). The subject stated that the vehicle had been acquired on 20 December 2016 after the alienation of the Hyundai Matrix and that the funds used for the acquisition came, at least in part, from that alienation. She reiterated that the acquisition value of 44,500 MDL was based on the information communicated by her former husband at the time of filing the annual declaration for 2016.

89. The Panel considers that the declared acquisition value of 44,500 MDL and the declared alienation value of 45,000 MDL cannot be accepted uncritically for purposes of the household financial analysis. The declared acquisition value was substantially lower than both the customs value of 60,000 MDL and the total import cost of 78,565 MDL, while the declared alienation value was also below the available market benchmark of approximately 62,500 MDL. Moreover, the vehicle was alienated less than three months after import, and no documents were provided to establish the actual acquisition price, the actual sale price, the condition of the vehicle, possible repair costs, the identity of the buyer, the method of payment, or the fiscal treatment of the transaction. Therefore, for purposes of the household financial analysis, the Panel used 78,565 MDL as the reasonable acquisition value, corresponding to the customs value and customs duties.

90. The Panel next examined the Toyota Corolla Verso, model year 2008. According to Access-Web and Customs Service data, the vehicle was imported by the subject's then-husband on 2 July 2017, registered in his name on 4 July 2017, and alienated on 16 October 2017. The vehicle was indicated in the subject's annual declaration for 2017 as alienated for 40,000 MDL. However, the customs value was 90,000 MDL and customs duties amounted to 42,034 MDL, resulting in a total import cost of 132,034 MDL. The available market benchmark indicated an approximate value of 135,000 MDL.

91. In the first round of written questions, the Panel asked the subject to provide details concerning this transaction, including the acquisition and alienation circumstances, the source of funds, the actual sale price, and any supporting documents (R1Q62 – R1Q63). The subject did not provide transaction-specific documents or a concrete explanation regarding the Toyota Corolla Verso. She reiterated that she had not personally imported movable goods during 2012 – 2023, had not been a party to her then-husband's vehicle transactions, had not participated in registration or sale-purchase procedures, had not held powers of attorney, and did not know the details of those operations.

92. Since the first-round response did not address the substance of the discrepancy, the Panel reiterated the request in the second round of written questions (R2Q17). In response, the subject again stated that she had not been a party to any vehicle transaction and did not know the relevant details. She explained that the data included in her declarations had been provided verbally by her then-husband and that she had relied on the accuracy of his statements. She also reiterated that she had not held any mandate or power of attorney and had not participated in any sale-purchase or registration procedure.

93. The Panel considers that the declared alienation value of 40,000 MDL cannot be accepted uncritically for purposes of the household financial analysis. The declared value was substantially lower than the customs value of 90,000 MDL, the total import cost of 132,034 MDL, and the available market benchmark of approximately 135,000 MDL. The vehicle was alienated approximately three months after import, and no documents were provided to establish the actual acquisition price, the actual sale price, the condition of the vehicle, possible repair costs, the identity of the buyer, the method of payment, or the fiscal treatment of the transaction. Therefore, for purposes of the household financial analysis, the Panel used 132,034 MDL as the reasonable acquisition value, corresponding to the customs value and customs duties.

94. The Panel next examined the Toyota Prius, model year 2012. According to Access-Web and Customs Service data, the vehicle was imported on 6 November 2017, registered in the name of the subject's then-husband on 9 November 2017, and alienated on 16 January 2018. In the subject's annual declaration for 2018, the vehicle was reflected as acquired for 30,000 MDL and alienated for 25,000 MDL. However, the customs value was 160,000 MDL and customs duties amounted to 18,395 MDL, resulting in a total import cost of 178,395 MDL.

95. In the first round of written questions, the Panel asked the subject to provide details concerning the acquisition and alienation of the Toyota Prius, including the source of funds, the actual prices paid and received, and any supporting documents (R1Q64 – R1Q65). The subject did not provide transaction-specific documents or a concrete explanation regarding this vehicle. Instead, she reiterated the general explanation provided in respect of her former husband's vehicle transactions, namely that she had not participated in them, had no power of attorney, did not know their details, and had relied on verbal information provided by her former husband when completing her annual declarations.

96. Since the first-round response did not address the substance of the discrepancy, the Panel reiterated the request in the second round of written questions (R2Q18). In response, the subject stated that she did not possess information concerning the alienation contract.

97. The Panel considers that the declared acquisition value of 30,000 MDL and the declared alienation value of 25,000 MDL cannot be accepted uncritically for purposes of the household financial analysis. The declared values were substantially lower than the customs value of 160,000 MDL and the total import cost of 178,395 MDL. The vehicle was alienated approximately two months after import, and no documents were provided to establish the actual acquisition price, the actual sale price, the condition of the vehicle, possible repair costs, the identity of the buyer, the method of payment, or the fiscal treatment of the transaction. Therefore, for purposes of the household financial analysis, the Panel used 178,395 MDL as the reasonable acquisition value, corresponding to the customs value and customs duties.

98. The Panel next examined the Honda Insight, model year 2012. According to Access-Web and Customs Service data, the vehicle was imported on 11 February 2018, registered in the name of the subject's then-husband on 5 April 2018, and alienated on 3 May 2019. In the

subject's annual declaration for 2018, the vehicle was reflected as acquired for 100,000 MDL, while in the annual declaration for 2019 it was reflected as alienated for 50,000 MDL. However, the customs value was 100,000 MDL and customs duties amounted to 9,037 MDL, resulting in a total import cost of 109,036 MDL.

99. In the first round of written questions, the Panel asked the subject to provide details concerning the acquisition and alienation of the Honda Insight and to explain the discrepancy between the import cost, the declared acquisition value, and the declared alienation value (R1Q66 – R1Q67). The subject did not provide transaction-specific documents or a concrete explanation regarding this vehicle. She reiterated that she had not personally imported movable goods during 2012 – 2023, had not been a party to her then-husband's vehicle transactions, had not participated in registration or sale-purchase procedures, had not held powers of attorney, and did not know the details of those operations. She also repeated the general explanation that her former husband purchased second-hand vehicles from abroad, sometimes damaged because of their lower price, repaired them, and later sold them, including in some cases with remaining defects.

100. Since the first-round response did not address the substance of the discrepancy, the Panel reiterated the request in the second round of written questions (R2Q19). In response, the subject stated that she did not possess the relevant information. She further explained that the requested information could be provided by the competent registration authority only to the owner or with the owner's express consent, which she could not obtain [redacted]

101. The Panel considers that the declared alienation value of 50,000 MDL cannot be accepted uncritically for purposes of the household financial analysis. Although the declared acquisition value of 100,000 MDL was close to the customs value, it remained lower than the total import cost of 109,036 MDL, while the declared alienation value represented less than half of that import cost. No documents were provided to establish the actual sale price, the condition of the vehicle, possible repair costs, the identity of the buyer, the method of payment, or the fiscal treatment of the transaction. Therefore, for purposes of the household financial analysis, the Panel used 109,036 MDL as the reasonable acquisition cost, corresponding to the customs value and customs duties.

102. The Panel next examined the Lexus RX400h, model year 2008. According to Access-Web and Customs Service data, the vehicle was imported on 27 October 2018 and registered in the name of the subject's then-husband on 7 November 2018. The vehicle was alienated on 23 December 2019. In the subject's annual declaration for 2018, the vehicle was reflected as acquired for 160,000 MDL, while in the annual declaration for 2019 it was reflected as alienated for 150,000 MDL. However, the customs value was 160,000 MDL and customs duties amounted to 98,530 MDL, resulting in a total import cost of 258,530 MDL.

103. In the first round of written questions, the Panel asked the subject to provide details concerning the acquisition and alienation of the Lexus RX400h, including the source of funds used for the acquisition, the purpose of the acquisition, and the circumstances of alienation after a relatively limited period of ownership (R1Q68 – R1Q69). The subject did

not provide a transaction-specific explanation in the first round. She reiterated that she had not personally imported movable goods during 2012 – 2023, had not been a party to her then-husband's vehicle transactions, had not participated in registration or sale-purchase procedures, had not held powers of attorney, and did not know the details of those operations.

104. In the second round of written questions, the Panel reiterated and consolidated the request regarding the vehicles forming part of the family patrimony during 2012 – 2019 (R2Q6). In response, the subject provided the acquisition contract for the Lexus RX400h, which indicated an acquisition price of 4,000 EUR, and the alienation contract of 23 December 2019. She also stated, in general terms, that the vehicles were mostly re-registered consecutively. As regards other supporting documents, she stated that she did not currently possess additional documents concerning the vehicles, that she had submitted requests to the competent institutions, and that the PSA had refused to provide the requested information.

105. The Panel considers that the declared acquisition value of 160,000 MDL and the declared alienation value of 150,000 MDL cannot be accepted uncritically for purposes of the household financial analysis. Although the declared acquisition value corresponded to the customs value, it did not reflect the customs duties of 98,530 MDL and therefore remained substantially lower than the total import cost of 258,530 MDL. The declared alienation value was also significantly below that total import cost. While the subject provided the acquisition contract indicating a price of 4,000 EUR and the alienation contract of 23 December 2019, she did not provide documents establishing the actual payment, the condition of the vehicle, possible repair costs, the method of payment, the buyer's possible affiliation, or the fiscal treatment of the transaction. Therefore, for purposes of the household financial analysis, the Panel used 258,530 MDL as the reasonable acquisition cost, corresponding to the customs value and customs duties.

106. The Panel's recalculation of the vehicle acquisition values was therefore relevant to the financial analysis of the household during the period in which the subject and her then-husband still formed a common household. The Panel did not accept the declared values uncritically where they were lower than the customs value plus customs duties and where the subject did not provide transaction-specific documents capable of explaining the discrepancy.

107. In those circumstances, the Panel considered that the most reasonable and verifiable proxy for the household outflow, as the purchase prices, was the total import cost, i.e. the customs value together with the customs duties. The Panel notes that allocation of the established in this manner potential acquisition prices do not lead to negative balance in the subject's household.

108. The Panel also examined the capital gains tax that the subject's husband would have been required to pay if the relevant transactions had reflected market-based values. For this purpose, the Panel first estimated the acquisition value to be used as the cost basis for the capital gain calculation. For vehicles imported by the subject's husband, the Panel relied on the total import cost, consisting of the customs value and related import duties. For

vehicles acquired locally, the Panel used the estimated market value identified on the basis of open-source information.

109. For the estimated resale value, the Panel used the market price identified from open-source information as the primary reference point. However, where a vehicle was purchased and resold within a relatively short period, or where the available average market price was lower than the customs value or total import cost, the Panel applied a 30% mark-up over the acquisition value.

110. This approach reflects the repeated pattern of vehicle purchase and resale activity carried out by the subject's husband and the reasonable inference that such transactions were undertaken for profit, rather than for ordinary private use. The 30% margin was treated as a conservative estimate, taking into account the type of mid-range vehicles concerned and the commercial nature of the repeated transactions under review.

111. Based on these indicative calculations, the amount of potentially unpaid capital gains taxes associated with the vehicles purchased and resold by the subject's husband during the period 2012 – 2019 is estimated at approximately 19,000 MDL.

112. In light of the above, the Panel considers that Issue 3 does not lead to failure under the thresholds established by art. 11 para. (3) of Law No. 252/2023.

VI. Conclusion

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

VII. Further Action and Publication

114. 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.

115. 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.

116. 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).

117. Pursuant to art. 17 para (2) of Law No. 252/2023, this evaluation report was approved unanimously by the evaluation panel on 20 May 2026 and signed by the Vice-Chairperson of the Commission.

118. Done in English and Romanian.

Signature:

Digitally signed by Moraru Virginia
Date: 2026.05.25 11:49:11 EEST
Reason: MoldSign Signature
Location: Moldova
MOLDOVA EUROPEANĂ

Virginia MORARU
Vice-Chairperson
Prosecutor Vetting Commission