

**Evaluation Report No. 45 of 11 August 2026
on Alexandru CAPMARI, prosecutor in the Anti-Corruption Prosecutor's Office,
subject of evaluation under Law No. 252/2023**

Summary of the report

The Panel, consisting of the following members: Herman von HEBEL, Nadejda HRIPTIEVSCHI and Christopher LEHMANN, identified doubts during the evaluation regarding four issues: cash savings declared in June 2017; the acquisition of a vehicle in 2022; wedding gifts and related expenses in 2023; and the subject's examination of a complaint concerning the lease of a municipal land plot.

The first issue concerned cash savings of 200.000 MDL declared by the subject upon entering public service in June 2017. The funds were allegedly accumulated when the subject was a student. The Panel did not find it plausible for the subject to accumulate this amount by June 2017 and did not accept this amount. However, even after excluding this amount, the subject's official income remained sufficient to cover the subject's expenses during 2017–2023.

The second issue concerned the subject's purchase in Germany in 2022 of a BMW X3 xDrive, manufactured in 2015. The Panel had concerns about the transparency, traceability, and credibility of the circumstances in which this vehicle was acquired, as well as the use of a large amount of cash. However, based on the circumstances explained by the subject, the Panel concluded that these did not constitute a serious ethical violation under art. 11 of Law No. 252/2023 nor raised issues of unjustified wealth.

The third issue concerned wedding gifts declared by the subject in 2023, in the total amount of 67,100 EUR. The donations were declared by the subject in his annual declaration for 2023. The Panel had doubts about the plausibility of the large amounts of donations, as well as the amount by which the donations exceeded the wedding expenses of only 22,623 EUR (as explained by the subject to the Panel). The subject provided sufficient evidence to dispel any serious doubts that the wedding gifts were significantly overstated or that the reported expenses were incomplete. The Panel nevertheless retained concerns regarding the quantification and traceability of the wedding gifts and expenses, as well as the absence of contemporaneous records and the extensive use of cash.

The fourth issue concerned the examination by the subject of a complaint regarding the lease of a municipal land plot situated on D. Boulevard, Chisinau. The Panel examined whether possible connections between representatives of the private company that leased the plot and municipal officials had been sufficiently addressed, as well as whether the subject had any personal or professional connection with the persons involved. However, the materials

available to the Panel contain no evidence of such connections. The Panel does not exclude that the subject's examination of the complaint lacked the degree of diligence and thoroughness warranted by the circumstances, but this in itself does not establish a serious ethical violation.

The Panel proposes that Alexandru CAPMARI passes the external evaluation. At the same time, the Panel expresses its concerns about the predominant use of cash by the subject in his daily life, including for significant expenses, which limits the traceability of expenses and does not contribute to the transparency that may be expected from persons in his position to increase the trust in the prosecutorial system.

Evaluation Panel A ("the Panel") of the Prosecutor Vetting Commission ("the Commission") established by Law No. 252/2023 on the external evaluation of judges and prosecutors and amending some normative acts ("Law No. 252/2023"), discharging the powers under the same Law, deliberated in private on 15 July 2026 and approved this report on 11 August 2026.

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

Herman von HEBEL
Nadejda HRIPTIEVSCHI
Christopher LEHMANN

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

I. Introduction

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

II. Subject of the Evaluation

4. Alexandru CAPMARI ("the subject") was appointed as a prosecutor in the Hincesti District Prosecutor's Office on 18 June 2018. He was delegated to the APO from 27 May 2019 to 26 May 2021 and again from 25 October 2021 to 8 December 2022. On 9 December 2022, the subject was transferred to the APO.

III. Evaluation Criteria

5. Under art. 11 para. (1) of Law No. 252/2023, the Commission evaluates the subject's ethical and financial integrity.
6. Art. 11 para. (2) of Law No. 252/2023 provides that a subject is deemed not to meet the requirements of ethical integrity if the Commission has determined that:
 - a) over the last five 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. Alexandru CAPMARI 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 the initiation of his evaluation and requested that, within 20 days, he complete and return 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, 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 11 June 2024.
20. Pursuant to art. 15 para. (2) of Law No. 252/2023 and art. 17 of the Commission Rules, the file in this matter was randomly assigned to Panel A.
21. On 16 August 2024, the Commission notified by email the subject that his evaluation file had been randomly assigned to Panel A, composed of Nadejda HRIPTIEVSCHI, Christopher LEHMANN, and Saskia de VRIES. The subject was informed that he may request, in writing and at the earliest possible time, the recusal of members from the evaluation. He did not submit any recusal request.
22. On 2 April 2026, pursuant to art. 14 para. (5) of the Commission Rules, the Commission decided that newly appointed Commission member Herman von HEBEL would substitute Saskia de VRIES as a member of Panel A, in view of her departure from the Commission after 30 April 2026.
23. On 3 April 2026, the Commission notified the subject by email of the change in the composition of Panel A. The subject was informed that he may request, in writing and at the earliest possible time, the recusal of members from the evaluation. He did not submit any recusal request.
24. 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.

25. During the last 12 years of the evaluation period, the subject was required to file declarations under Law No. 133/2016 on the declaration of assets and personal interests (“Law No. 133/2016”).
26. 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, 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. Three complaints were received from a member of civil society. All information received was carefully screened for accuracy and relevance.
27. To the extent that issues were raised by the subject’s five-year declaration, ethics questionnaire and collected information, those issues were raised in written questions to the subject.
28. On 30 September 2025, the Panel asked the subject to provide additional information by 9 October 2025 to clarify certain matters (“first round of written questions”). The subject provided answers and documents within the set deadline, on 8 October 2025. On 18 December 2025, the Panel asked the subject to provide additional information by 29 December 2025 to clarify certain matters (“second round of written questions”). The subject provided answers and documents within the set deadline, on 26 December 2025. On 19 February 2026, the Panel asked the subject to provide additional information by 26 February 2026 to clarify certain matters (“third round of written questions”). The subject provided answers and documents within the set deadline, on 25 February 2026. On 27 March 2026, the Panel asked the subject to provide additional information by 3 April 2026 to clarify certain matters (“fourth round of written questions”). The subject provided answers and documents within the set deadline, on 31 March 2026. On 7 May 2026, the Panel asked the subject to provide additional information by 14 May 2026 to clarify certain matters (“fifth round of written questions”). The subject provided answers and documents within the set deadline, on 10 May 2026. On 9 June 2026, the Panel asked the subject to provide additional information by 16 June 2026 to clarify certain matters (“sixth round of written questions”). The subject provided answers and documents within the set deadline, on 12 June 2026.
29. On 3 July 2026, the Panel notified the subject that it had identified certain areas of doubt regarding his compliance with the integrity criteria and invited him to attend a public hearing on 15 July 2026, pursuant to art. 16 para. (2) of Law No. 252/2023. The subject

was informed of his rights under art. 16 para. (5) of Law No. 252/2023, including the right to request access to the evaluation materials.

30. Following the subject's request, on 8 July 2026, the subject was granted access to the evaluation materials according to art. 16 para. (5) lit. c) of Law No. 252/2023.
31. On 15 July 2026, the subject participated in a public hearing before the Panel.
32. At the hearing, the subject reaffirmed the accuracy of his answers in the five-year declaration and ethics questionnaire and stated that he 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:
 - *Cash savings declared for 2012–2017.*
 - *Acquisition of BMW X3 xDrive in Germany in 2022.*
 - *Wedding donations declared in 2023 and related expenses.*
 - *Examination of the complaint concerning the lease of the municipal land plot on D. Boulevard.*
35. The first three issues were discussed at the hearing. The fourth issue was 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. Cash savings declared for 2012–2017

36. The Panel notes at the outset that the assessment of the subject's financial situation was rendered particularly difficult by his prevalent use of cash, both before and after entering public service. According to the subject, substantial amounts were received, accumulated, retained and spent in cash, nearly always without contemporaneous records. This predominant use of cash substantially limits financial traceability and requires the Panel to assess whether the subject's explanations are sufficiently coherent, detailed and corroborated.
37. In the declaration of assets and personal interests submitted upon entry into public service on 16 June 2017, the subject declared cash savings amounting to 200,000 MDL. This was the first such declaration submitted by the subject, since he had been appointed as a prosecutor's consultant on 26 May 2017 and, before that date, had not been subject to the statutory declaration obligation. The subject confirmed this amount in R1–Q4.

38. According to the information obtained from the State Tax Service (“STS”), the subject had no taxable income during the period 2012–June 2017. However, the documents available to the Panel confirm that, during part of that period, he received scholarships from Moldova State University (“MSU”) and the National Institute of Justice (“NIJ”), totaling 96,115 MDL.
39. During most of the period in which the cash savings of 200,000 MDL were allegedly accumulated, the subject was a student. He pursued bachelor studies in law at MSU between September 2011 and June 2015, master’s studies in law at the same university between September 2015 and February 2017 and, from October 2015 to March 2017, the initial training programme for prosecutors at the NIJ.
40. In R1–Q4, the Panel requested that the subject estimate the amount of cash savings held by him at the end of each year during 2011–2015 and indicate, for each year, the currency, the person or persons from whom he accumulated the funds and the sources from which they originated.
41. The subject did not initially provide the requested year-by-year information. Instead, he referred generally to the amount declared in 2017 and stated that it had been accumulated “throughout life” from gifts received from his parents, grandparents, relatives and family friends, informal work performed in the Republic of Moldova and Italy, scholarships and parental support. He further stated that no documentary evidence was available in respect of most of those sources because the funds had been received and retained in cash.
42. In R3–Q1, the Panel again requested year-by-year information concerning the cash allegedly held at the end of each year during 2011–2015. The subject was also asked to explain the correlation between the amounts allegedly accumulated before 2016 and the 200,000 MDL declared in 2017, identify the principal sources of the alleged cash savings and submit any available supporting documents.
43. In response to R3–Q1, the subject provided approximate estimates for the first time. He stated that he held approximately 60,000–65,000 MDL at the end of 2011, approximately 75,000 MDL at the end of 2012, approximately 110,000–120,000 MDL at the end of 2013, approximately 130,000–140,000 MDL at the end of 2014 and approximately 160,000–170,000 MDL at the end of 2015.
44. The subject explained that the estimates were necessarily approximate because he had not maintained records of the accumulation of his savings before entering public service. He attributed the increase in the alleged balances to savings carried forward from previous years, gifts and financial support received from his parents, grandparents, relatives and family friends, scholarships and income from occasional informal work in the Republic of Moldova and Italy.
45. More specifically, the subject stated in R3–Q1 that, in 2013, he performed occasional unqualified work in Italy for approximately three months and earned approximately 50,000–60,000 MDL. He also stated that, during the same year, he received approximately

20,000 MDL from relatives residing in Italy on the occasion of his birthday. For the remaining amounts, he relied generally on previously accumulated savings, recurring gifts and financial support from family members and family friends and, from 2015 onwards, scholarship payments received from MSU and the NIJ.

46. The subject's explanations in R3–Q1 did not permit the Panel to verify how the alleged year-end balances had been calculated. The amounts attributed to gifts, informal work and family support were expressed in broad estimates, while the expenses personally borne by the subject during the same years were not indicated.
47. In R6–Q3, the Panel therefore requested further clarification concerning the 200,000 MDL declared in 2017. The Panel noted that the previous replies did not establish with sufficient precision the amounts received from each source, the periods in which they were received, the expenses incurred from those funds, or the manner in which the alleged savings were preserved until June 2017.
48. The Panel also drew the subject's attention to the acquisition, on 7 November 2013, of a vehicle for the contractual price of 6,500 EUR. According to the explanation provided in R3–Q1, the subject's parents paid 3,250 EUR, while the remaining 3,250 EUR (est. 54,341 MDL)² was paid by the subject.
49. The vehicle acquisition constituted a significant use of funds during the same year in which the subject claimed that his savings increased from approximately 75,000 MDL at the end of 2012 to approximately 110,000–120,000 MDL at the end of 2013. The Panel therefore asked the subject to explain how this increase was achieved after taking into account his contribution to the vehicle purchase and any living, travel, education, transport and other personal expenses incurred during that period.
50. In response to R6–Q3, the subject reiterated that he had not maintained a record of the accumulation of his savings and could provide only approximate figures. He again referred to unused savings carried forward from previous years, annual monetary gifts and financial support from his parents, grandparents, relatives and family friends, occasional work performed in Italy in 2013, the alleged birthday gift of approximately 20,000 MDL, and scholarship income received from MSU and the NIJ.
51. The subject further explained in R6–Q3 that he was the only child in his family and that his parents had covered his study and living expenses throughout the relevant period. According to him, this enabled him to preserve nearly all the money received from scholarships, gifts, occasional work and other sources. He stated that the accumulated funds were retained in cash at his parents' home.
52. The subject also identified several persons who had allegedly provided him with recurring monetary gifts or financial support during 2011–2016. At that stage of the evaluation, he did not submit statements from those persons or other evidence confirming the amounts

² All MDL-EUR-USD exchange rates mentioned in this document are calculated based on the annual exchange rate set by the National Bank of Moldova, unless expressly mentioned in the text.

provided, the timing and frequency of the transfers, or the financial circumstances in which they had been made.

53. In assessing the subject's explanation, the Panel also considered the average consumption expenses that the subject has incurred, which were calculated on the basis of Consumption Expenditures for Population ("CEP") data for one person³. For the period 2012–2016, those expenses amounted to 147,791 MDL. The Panel did not regard the CEP calculation as conclusive, particularly in view of the subject's assertion that he was financially supported by his parents. Nevertheless, the estimate remained relevant to assessing whether the subject could plausibly have preserved the alleged income and gifts almost entirely as cash savings by June 2017.
54. The documented scholarship income of 96,115 MDL was, on its own, insufficient to explain both the accumulation of 200,000 MDL and the subject's consumption expenditures during the relevant period. The plausibility of the declared savings therefore depended principally on the alleged informal work, recurring cash gifts, parental support and the assertion that the subject bore little or no expenditure from his own resources.
55. Following receipt of the hearing notice, the subject submitted, on 12 July 2026, a written position addressing this issue of the alleged 200,000 MDL cash savings and attached statements signed by his parents, grandparents, other relatives and family friends. He reiterated that, apart from the documented scholarships, the savings originated from annual cash gifts and financial support, occasional unqualified work performed in Italy in 2013, and amounts accumulated and retained from previous years.
56. In his written position, the subject also challenged the attribution to him of the full CEP-based living expenses of 147,791 MDL for 2012–2016. He stated that he remained financially dependent on his parents throughout his studies and that they covered his education and living expenses. He further explained that his parents lived in a rural

³ The CEP for any year in the 2006–2018 period is calculated based on the NBS methodology applied for the 2006–2018 period (based on the "stable population" from the "discontinuous series") and the method available on the NBS website. In this case, the indicator "Consumption Expenditures per Capita by Purpose of Expenditure, Number of Children, and Area, 2006–2018" is selected with the following variables: Year – Total consumption expenditures – Area (urban/rural) – Number of children (if there are no children, select "no children") – MDL, monthly average per capita for one person. The result is multiplied by the number of family members and by 12 calendar months. Available at: <

https://statbank.statistica.md/PxWeb/pxweb/ro/30%20Statistica%20sociala/30%20Statistica%20sociala__04%20NIV__NIV020__Serii%20intrerupte__04%20NIV__2006-2018/NIV020600.px/?rxid=b2ff27d7-0b96-43c9-934b-42e1a2a9a774>.

The CEP for any year in the 2019–2022 period is calculated based on the NBS methodology and the method available on the NBS website (ENG). In this case, the indicator "Consumption Expenditures per Capita by Purpose of Expenditure, Number of Children, and Area, 2019–2022" is selected with the following variables: Year – Total consumption expenditures – Area (urban/rural) – Number of children (if there are no children, select the "no children" option) – MDL, monthly average per capita for one person. The result is multiplied by the number of family members and by 12 calendar months. Available at: <

https://statbank.statistica.md/PxWeb/pxweb/ro/30%20Statistica%20sociala/30%20Statistica%20sociala__04%20NIV__NIV020__NIV020__2019-2024/NIV020600__2019-2024.px/?rxid=b2ff27d7-0b96-43c9-934b-42e1a2a9a774>.

household, raised poultry and livestock and cultivated fruit and vegetables, which reduced the family's monetary expenditure on food.

57. The subject further argued that the acquisition of the vehicle in 2013 supported, rather than undermined, his explanation regarding the 200,000 MDL cash savings. According to him, his ability to pay half of the purchase price of the vehicle demonstrated that he already possessed personal savings at that time.
58. The statements submitted on 12 July 2026 provided additional details concerning the alleged gifts and family support. M. and E.B. stated that, while the subject was a student, they gave him monetary gifts ranging between 3,000 and 6,000 MDL on different occasions in different years. A. and N.C. referred to gifts ranging between 1,000 and 3,000 MDL, L.C. to amounts ranging between 1,000 and 4,000 MDL, and D. and M.S. to amounts ranging between 1,000 and 2,000 MDL.
59. The statements submitted by relatives and family friends residing in Italy likewise referred to recurring monetary gifts, generally ranging between 100 EUR and 500 EUR in different years. They also stated that, in 2013, they assisted the subject in finding occasional work in Italy. Two of the declarant couples further stated that the subject stayed with them during that period.
60. The subject's parents, A. and V.C., also provided a written statement. They confirmed that the subject was their only child and that they covered his study and living expenses. They stated that, from approximately the age of 17 or 18, he accumulated monetary gifts received from them, his grandparents, relatives and family friends, usually in amounts ranging between 2,000 and 6,000 MDL in different years, and kept the accumulated funds at their home.
61. The parents also confirmed that the subject worked in Italy in 2013 and that, after returning, he intended to purchase a vehicle using funds earned there and money previously accumulated. According to their statement, they paid half of the vehicle price so that the subject would not have to substantially reduce the savings he was accumulating for the future acquisition of a dwelling. They further stated that, when the subject became subject to the asset-declaration obligation in 2017, he possessed 200,000 MDL in cash, which was kept at their home.
62. At the hearing, the subject maintained the explanations provided in his written replies and in the written position of 12 July 2026. He reiterated that he had been accustomed from a young age to retain money in cash and that his parents had encouraged him to preserve the amounts received from relatives and other persons. He stated that the 200,000 MDL declared in 2017 included gifts accumulated from approximately the age of 17 or 18, income from work in Italy and scholarship payments.
63. The subject also reiterated that his parents had covered his expenses throughout his studies and that this enabled him to preserve the funds received from other sources. In response to the Panel's doubts concerning the absence of contemporaneous records, he relied

principally on the statements submitted by his parents, relatives and family friends and argued that those persons had confirmed the existence of the gifts, the work performed in Italy and the retention of the cash at his parents' home.

64. The Panel notes that Law No. 252/2023 clearly provides that, once the Panel has indicated serious doubts regarding a specific issue, the burden of proof in the financial assessment shifts to the subject. The Panel takes into account that contemporaneous evidence may not always be available. However, this does not mean that written statements by third persons, submitted by the subject or prepared at the subject's request during the evaluation, can, on their own, replace such evidence or be accepted without further corroboration. For any claimed substantial financial means, the subject must present convincing evidence supporting his/her claim. Written statements alone, unsupported by direct or indirect evidence produced outside the potential influence of the subject, cannot be accepted as sufficient evidence. This methodological approach is based on the current legal framework, which establishes specific burdens of proof to be met by the subject in the vetting process and, as established above in para. 15, is recognized by the ECtHR.
65. The Panel notes that the subject presented only written statements obtained during the evaluation process to support his claim that in June 2017, upon appointment as consultant in the prosecutor office, he had 200.000 MDL in cash. The provided written statements confirm the subject's statements, to varying degrees, that he received monetary gifts, was financially supported by his parents during his studies, performed occasional work in Italy in 2013 and kept his cash at his parents' house. However, these statements are also quite similar in style and, again, were only produced during the evaluation process, at the subject's request. Without any objective contemporaneous evidence and confronted with the reality of a student that lives separate from his parents, buys a relatively expensive car as a student, does not provide any information on his living expenses during the student life, including any rent, the Panel cannot accept these statements as sufficient evidence to dispel the Panel's serious doubts about the feasibility of the subject to actually accumulate and possess 200,000 MDL in cash on 16 June 2017.
66. The statements submitted in July 2026 do not permit a precise calculation of the aggregate amount. They were prepared approximately nine to fifteen years after the relevant events and generally describe gifts through broad ranges rather than identifiable payments. They do not specify, for each year, the number of gifts, their dates, occasions, currencies or actual amounts. It is also unclear whether the stated ranges concern gifts made annually, several gifts made in particular years, or occasional gifts made only during part of the period.
67. The statements from the relatives residing in Italy corroborate that the subject stayed there in 2013, received monetary gifts and was assisted in finding occasional work. They thus support the existence of sources not reflected in the STS information. However, they do not identify the employer, the precise period worked, the remuneration agreed, the payment arrangements or the total amount earned. On that evidence, the Panel accepts that the subject likely earned some income in Italy, but cannot regard his estimate of 50,000–60,000 MDL as established.

68. The statement of the subject's parents confirms that they financially supported him during his studies, that he kept his savings at their home, that they contributed half of the vehicle price and that he possessed 200,000 MDL in 2017. Their account is also consistent with several elements of the subject's explanations throughout the evaluation. However, the statement remains retrospective and does not identify the composition of the alleged 200,000 MDL.
69. As regards expenditure, the Panel accepts that the subject was substantially supported by his parents during his studies. At the same time, parental financial support throughout the studies does not establish that the subject preserved virtually all the amounts received from scholarships, gifts and work. During the relevant period, he studied and spent significant periods in Chisinau, travelled, engaged in ordinary personal and social activities, and acquired and used a vehicle. Neither the subject nor his parents estimated the expenses covered by them, the expenses borne personally by the subject or the value of the maintenance provided in cash or in kind. The Panel is therefore unable to determine the proportion of his receipts that could realistically have remained unspent.
70. The vehicle transaction is particularly significant for the year-by-year analysis. The subject's ability to pay 3,250 EUR supports his claim that he had access to personal funds in 2013. It therefore constitutes evidence in his favor as to the existence of some savings. At the same time, the payment represented an outflow of approximately 54,341 MDL. The Panel also notes that there is no contemporaneous piece of evidence but the subject's and his parents' words that the car was paid in half by him and his parents. Moreover, despite that expenditure, the subject estimated that his savings increased from approximately 75,000 MDL at the end of 2012 to approximately 110,000–120,000 MDL at the end of 2013. To reach even the lower end of the latter estimate, he would have required net inflows of approximately 89,000 MDL during 2013 before accounting for any other personal expenditure. The alleged income of 50,000–60,000 MDL from work in Italy and the birthday gift of approximately 20,000 MDL do not, without further identifiable inflows, fully explain that progression.
71. The same difficulty persists in relation to the following years. The subject estimated savings of 130,000–140,000 MDL at the end of 2014 and 160,000–170,000 MDL at the end of 2015, but did not allocate the recurring gifts, other financial support or expenses to particular years. The documented scholarships constitute a credible source from 2015 onwards, but the evidence does not show what part of that income was retained, what part was spent, or how the balance progressed from the 2015 estimate to 200,000 MDL by June 2017.
72. In conclusion, because the Panel's serious doubts regarding the plausibility of the 200,000 MDL cash savings declared by the subject in the annual declaration submitted on 16 June 2017 have not been dispelled by the subject, the Panel does not accept this amount as cash savings at the beginning of 2017. Subsequently, this amount was excluded from the financial analysis of the subject's income, assets and expenses for the period 2017 - 2023.

73. Even after excluding the claimed cash savings of 200,000 MDL, the subject's official income remained sufficient to cover the subject's expenses identified by the Panel throughout the period 2017–2023. Following the exclusion of the 200,000 MDL from the subject's available financial resources, the Panel did not identify any negative household balance or other financial discrepancy during the evaluated period that would indicate the existence of unjustified wealth that would lead to failure under the financial integrity criterion, as provided by art. 11 para. (3) lit. a) of Law No. 252/2023. The Panel reiterates that the extensive use of cash by the subject has made it difficult to assess his financial situation and does not contribute to the transparency that may be expected from persons in his position to increase the trust in the prosecutorial system.

Issue 2. Acquisition of BMW X3 xDrive in Germany in 2022

74. In June 2022, the subject acquired in Germany and imported into the Republic of Moldova a BMW X3 xDrive, manufactured in 2015.

75. According to the sale-purchase document submitted by the subject, the vehicle was acquired from a German car dealer on 3 June 2022. The document identifies the vehicle as a BMW X3 xDrive, first registered in August 2015 and having mileage of approximately 170,000 km. It records a price of 15,966 EUR and a further payment of 2,000 EUR as a deposit or caution, with the payment made in cash. At the hearing, the subject clarified that the deposit of 2,000 EUR was subsequently refunded by the dealer. The final purchase price was therefore 15,966 EUR.

76. On 4 June 2022, the subject paid 71,452 MDL to B.C. "M." S.A. in connection with the customs clearance of the vehicle upon importing it to the Republic of Moldova. In R1–Q11, he stated that the overall acquisition cost, including the purchase, import and related expenses, amounted to approximately 420,341 MDL (est. 21,122 EUR).

77. In R1–Q11, the Panel also asked the subject to clarify the cash savings of 448,658 MDL declared at the end of 2022, including their source and whether part of the 699,000 MDL declared at the end of 2021 had been used during 2022. The subject stated that the 2022 balance consisted of unspent savings carried forward from 2021 and new salary savings accumulated during 2022, while part of the prior savings had been used to acquire the BMW X3 xDrive.

78. As explained under Issue 1 above, for the purposes of the financial analysis, the Panel accepted 499,000 MDL, rather than the full 699,000 MDL declared by the subject, as cash savings available at the end of 2021. That accepted amount was nevertheless sufficient, in principle, to cover the subject's stated contribution to the acquisition. While the Panel concluded this transaction did not involve unexplained wealth, given the unusual circumstances of the transaction, the Panel also investigated further as to whether the transaction raised ethical concerns. The principal issue was therefore how the purchase funds became available to the subject and were paid in Germany.

79. In R6–Q2, the Panel asked the subject to explain the exact method of payment, the source and movement of the cash, the persons involved and his travel route between 2 and 4 June 2022. Since the vehicle was allegedly paid for in cash, the subject was also asked whether any currency declarations had been submitted when leaving the Republic of Moldova or entering the European Union, the Schengen Area, Germany or any transit country.
80. The subject replied that the vehicle was paid for in cash, in EUR, from the savings declared at the end of 2021. He stated that he travelled to Germany with M.C., the husband of his cousin, who had experience with vehicles and agreed to assist him in inspecting and purchasing a second-hand car.
81. According to the subject's initial explanation in R6–Q2, he did not know with certainty whether he would purchase the vehicle identified online before his departure to Germany and, for security reasons, did not wish to carry the entire purchase amount abroad. He therefore personally carried approximately 4,500 EUR. M.C. also allegedly carried approximately 4,000–5,000 EUR, while further funds were obtained from M.C.'s brother, A.C., who was then living and working in Germany.
82. The subject further explained that additional funds necessary for the purchase were then made available to him in Germany, by a member of M. C.'s family who lived in Germany. The same amount of funds was then reimbursed by the subject's parents (from cash the subject had left with them for this purpose) to M.C.'s spouse back in the Republic of Moldova. According to him, once the purchase was confirmed, his father paid the corresponding amount, in cash, in EUR, to M.C.'s spouse on the same day.
83. Following receipt of the hearing notice, the subject provided a more precise account and submitted statements from M.C., C.C. (M.C.'s wife/the subject's cousin), A.C. and the subject's father. The subject stated that he had left approximately 17,000 EUR of his own cash with his parents before departure to Germany and that in Germany, M.C. provided him 14,500 EUR, comprised of 5,000 EUR carried by M.C. from the Republic of Moldova, 8,000 EUR kept by M.C. at his brother A.C. in Germany and a further 1,500 EUR provided by A.C. to M.C.
84. M.C. confirmed that he travelled with the subject to Germany between 2 and 4 June 2022 and made 14,500 EUR available for the purchase. He described the same composition of the amount: 5,000 EUR carried by M.C. himself, 8,000 EUR received from his brother, A.C., and an additional 1,500 EUR also received from his brother A.C. M.C. and C.C. further confirmed that the subject's father paid 14,500 EUR to C.C. in the Republic of Moldova on the same day.
85. A.C. confirmed that, at the relevant time, he lived in Germany and held 8,000 EUR for his brother, M.C., in connection with an intended vehicle purchase by M.C., which had not materialized. A.C. stated that he also made an additional 1,500 EUR available when M.C. required additional funds for the BMW X3 xDrive transaction of the subject.

86. The subject's father confirmed that, before leaving for Germany, the subject entrusted his parents with 17,000 EUR and explained the intended arrangement. He further confirmed that, after being informed that the vehicle had been purchased, he met C.C. in the Republic of Moldova and paid her 14,500 EUR from the cash left by the subject.
87. The Panel also examined M.C.'s own financial capacity to supply the subject with a short term loan of funds to purchase the BMW X3 vehicle. In response to questions on this, the subject submitted a contract documenting that M.C. had sold a BMW X5 on 5 May 2022 for 500,000 MDL. M.C. himself stated that 13,000 EUR of the funds that he made available for the subject's purchase on 4 June 2022 originated from the recent sale of the BMW X 5 vehicle on 5 May 2022. The contract for the sale of the BMW X 5 provides contemporaneous evidence supporting the subject's argument regarding M.C.'s financial capacity and for the availability of substantial funds shortly before the trip to buy the subject's vehicle.
88. At the hearing, the subject maintained this account. He stated that approximately 19,000 EUR was available in Germany: approximately 4,500 EUR carried by him and 14,500 EUR made available through M.C. and A.C. He explained that the arrangement had been agreed before departure and that the reimbursement to M.C.'s wife was made immediately, on the purchase day, by his father to M.C.'s wife (the subject's cousin) because he did not wish to remain indebted to relatives for a substantial amount.
89. As regards the travel route, the subject stated that on 2 June 2022, he flew with M.C. from Chisinau to Warsaw and then from Warsaw to Frankfurt. On 3 June 2022, he and M.C. left Germany in the purchased vehicle and travelled through Austria, Hungary and Romania, arriving in the Republic of Moldova on 4 June 2022. The subject did not preserve the boarding passes, invoices, fuel receipts or other travel documents. At the hearing, he stated that he had paid for both one-way airline tickets but could not recall the payment method. The information examined by the Panel confirmed that the tickets had been paid using his bank card.
90. The subject further stated that he held a Moldovan passport and a Romanian identity card at the time, but could not recall which document he presented at each border crossing. He considered it likely that he used his Moldovan passport when leaving and re-entering Moldova and his Romanian identity card within the European Union and Schengen Area. He obtained a Romanian passport only in 2023.
91. The Panel notes that the plane tickets and related information confirm the trip undertaken by the subject and his cousin's husband, M.C., to Germany. The vehicle's acquisition contract and the import duties by the subject confirm the import and the claimed value of the vehicle. The written statements related to the purchase of the vehicle, presented by the subject to the Panel, corroborate the information provided by the subject on the method of acquisition and cost of the vehicle.
92. The vehicle's acquisition arrangement remains convoluted and was not documented through bank transfers, receipts, currency-exchange records or contemporaneous

acknowledgments of payment. The statements were prepared approximately four years after the transaction and by persons closely related to the subject, at the request of the subject during the evaluation process.

93. Nevertheless, the statements are mutually consistent on the principal facts and are supported by several objective circumstances: the subject had sufficient savings to finance the acquisition; the document presented by the subject regarding the acquisition confirms a cash transaction; the airline tickets confirm the trip to Germany; the vehicle was imported immediately afterwards; and M.C.'s vehicle-sale contract supports his capacity to make substantial funds available shortly before the transaction. No evidence indicates that the 14,500 EUR represented a gift, an unrepaid loan or funds from an unidentified source.
94. The arithmetic is also coherent. The approximately 4,500 EUR carried by the subject and the 14,500 EUR made available through the C. family provided approximately 19,000 EUR in Germany. This was sufficient to pay the contractual price of 15,966 EUR and the refundable deposit of 2,000 EUR, while leaving a limited amount for export, insurance, fuel and return-travel expenses. The separate customs payment of 71,452 MDL was made in the Republic of Moldova after importation.
95. As set out above, once serious doubts concerning a financial issue have been communicated, it is for the subject to dispel them through a sufficiently convincing explanation supported, where reasonably available, by relevant evidence.
96. The remaining weakness concerns the limited traceability of the purchase method chosen by the subject and a very convoluted arrangement involving his parents and close relatives in making funds available in cash in Germany and reimbursement of significant amounts in cash on the same day in the Republic of Moldova when the vehicle was bought in Germany. The preference for a complex cross-border cash arrangement instead of a bank transfer reduced transparency and made verification substantially more difficult. However, limited traceability alone does not establish that the subject acquired the vehicle from unjustified resources.
97. Although the Panel still has concerns about the transparency, traceability, and credibility of the circumstances in which the BMW X3 xDrive was acquired and the predominant use of cash by the subject in purchasing this vehicle, the purchase circumstances have not raised to the level of a serious ethical violation leading for failure under art. 11 of Law No. 252/2023. Similarly, in view of the subject's financial record, the vehicle's purchase did not also raise unjustified wealth doubts in light of financial integrity criteria under art. 11 of Law No. 252/2023.

Issue 3. Wedding donations declared in 2023 and related expenses

98. In his annual declaration of assets and personal interests for 2023, submitted on 26 March 2024, the subject declared that he and his spouse had received wedding gifts of 50,830 EUR, 7,900 USD, 60 GBP and 175,000 MDL (est. 67,100 EUR in total).

Wedding gifts

99. The assessment of these funds was complicated by the fact that the gifts were allegedly received entirely in cash, no contemporaneous record identifying the individual donors and amounts was maintained, and none of the funds was deposited into a bank account or other traceable means after the wedding. The Panel therefore examined the number and profile of the guests, the gifts confirmed by third parties, the expenses incurred in organizing the wedding and the persons who financed those expenses.
100. In R1–Q17, the subject stated that approximately 240 persons attended the wedding. He initially explained that, after excluding the gifts from the godparents and the parents of the couple, the remaining guests had each contributed approximately 5,408 MDL, equivalent to approximately 275 EUR per guest. He further stated that his godparents had donated 10,000 EUR and that his parents and parents-in-law had together donated 3,000 EUR.
101. In R2–Q3, the subject clarified that 13,000 EUR had been received from the godparents and the parents of the couple, while the remaining 54,100 EUR had been received from 234 other guests. On that basis, the average contribution from the latter group would have been approximately 231 EUR per person or 462 EUR per couple.
102. The subject's wedding godparents confirmed that they had given the couple 10,000 EUR in cash. They stated that the funds originated from savings accumulated through their professional activity and that, apart from symbolic traditional items, they received no material benefit in return. The Panel verified their financial capacity on the basis of information obtained from the STS and information concerning their company and found that they had sufficient resources to make the gift.
103. The Panel also requested information from several APO prosecutors that attended the wedding. Six prosecutors reported gifts ranging between 300 EUR and 500 EUR per couple, while one prosecutor reported giving 200 EUR individually. Those replies produced an average of approximately 204 EUR per person or 408 EUR per couple. If that average (given by fellow prosecutors) were applied to all 234 guests, the resulting amount would be approximately 47,732 EUR, around 6,364 EUR less than the 54,100 EUR reported by the subject.
104. Following receipt of the hearing notice, the subject disputed this of this calculation. He argued that the wedding was attended not only by professional colleagues, but also by close relatives and family friends, whose gifts were frequently higher. He submitted statements from several such guests and calculated that, if those gifts were included in the sample, the average would rise to approximately 343 EUR per person or 686 EUR per couple.
105. The statements submitted by the subject confirmed, among others, gifts of 20,000 MDL from his grandparents; 5,000 MDL from another grandmother; approximately 800 EUR from an uncle and aunt; approximately 500–600 EUR from each of two cousin couples; 10,000 MDL from another uncle and aunt; approximately 1,000 USD and 1,000 EUR from

the spouse's grandmothers; approximately 1,000 EUR from each of two couples closely related to the spouse; approximately 1,500 USD and 500 EUR from two cousin couples on the spouse's side; and gifts of approximately 1,000 EUR, 600 EUR, 800 EUR and 400 EUR from other relatives and family friends.

106. The additional statements show that gifts varied significantly depending on the donors' relationship with the couple. Accordingly, neither the prosecutor-only sample nor the close-relative sample was representative of all 234 guests.
107. The statements nevertheless have corroborative value. They identify the donors, their relationship with the couple, the currency and the approximate amount given, and the currencies referred to broadly correspond to those reported in the subject's annual declaration. They were, however, prepared almost three years after the wedding and cover only a limited part of the approximately 240 attendees. They do not permit an arithmetical reconstruction of the full amount received.
108. At the hearing, the subject acknowledged that he had informed the declarants of the matters their statements should address. He maintained, however, that the statements reflected the gifts actually made and pointed out that they had been prepared in different forms, including handwritten and typed declarations. The subject also explained that he had not kept a guest-by-guest record because the wedding included guests invited by him, his spouse, their parents and the godparents, and because he did not anticipate that such a record would later be required. He maintained that the total was calculated after the wedding by counting the amounts received in each currency and was then declared to the NIA and to the Panel.

Wedding-related expenses

109. In R1–Q3, the subject stated that he had provided 100,000 MDL in cash to his parents for the wedding organization. He indicated that his parents spent approximately 300,000 MDL (est. 15,498 EUR) on the venue and catering and a further 4,400 EUR, equivalent to approximately 86,440 MDL, on music, photo and video services, dancers and decorations.
110. The information the Panel obtained directly from the wedding venue corroborates the subject's account. Agreements and payment records confirmed cash payments of 15,000 MDL, 90,000 MDL, 60,000 MDL, 25,000 MDL, 60,000 MDL and 80,000 MDL, amounting to 330,000 MDL in total (est. 17,203 EUR). Although some agreements were concluded in the name of the subject's spouse, the venue indicated that the subject's mother made the payments and was the actual beneficiary of the services.
111. In R4–Q1, the subject provided a more detailed breakdown of the additional wedding expenses. These included approximately 2,000 EUR for music, 1,600 EUR for photo and video services, 400 EUR for decorations and 400 EUR for dancers. He also identified approximately 6,000–7,000 MDL for alcohol, 1,000–2,000 MDL for traditional gifts for the godparents, 7,000–8,000 MDL for wedding rings, 1,000 MDL for the civil ceremony and 8,000–10,000 MDL for the rented wedding dress.

112. On the basis of the information collected by the Panel and submitted by the subject, the overall cost of the wedding was estimated at approximately 444,440 MDL, equivalent to approximately 22,623 EUR. According to the subject, 119,000 MDL was borne by him and his spouse and approximately 325,440 MDL by his parents.
113. The Panel separately assessed the financial capacity of the subject's parents. Their identified incoming flows during 2012–2023 amounted to approximately 1,971,444 MDL, while their identified outgoing flows amounted to approximately 1,016,959 MDL. Although only part of the alleged income from leasing vehicles (the subject's father's business) was accepted, the available information was sufficient to establish that the parents had the financial capacity to finance the wedding expenses attributed to them.
114. The subject further submitted a statement from his parents confirming the expense amounts communicated to the Panel. He argued that the independent confirmation of the venue costs supported the reliability of the remaining estimates and that his parents had no reason to understate the costs, particularly since the Panel had already established their capacity to cover a higher amount.
115. At the hearing, the subject confirmed that no receipts had been preserved for several additional services. He explained that the wedding had been organized predominantly by his parents, that service providers had been identified informally or online, that payments had been made in cash and that neither he nor his parents had anticipated a need to retain invoices or receipts.
116. The documented venue payments provide a reliable source for the expense calculation and are broadly consistent with the initial amount reported by the subject. The remaining expenses are less traceable, but their nature and approximate scale are not inherently implausible for an event attended by approximately 240 persons. The later disclosure of additional categories in R4–Q1 does not necessarily indicate concealment, as the subject was responding to increasingly detailed requests for a breakdown rather than revising the central estimate of the overall costs.
117. The Panel raised doubts regarding the fact that no substantial wedding expenses were attributed by the subject to the spouse's parents. At the hearing, the subject explained that his parents had undertaken to solely organize and finance the wedding because his spouse's parents had previously donated an apartment to her in 2022, where the subject and his wife live and hence he is a beneficiary of that gift alongside his wife. Although the apartment donation in 2022 does not by itself prove an express agreement that the spouse's parents would not contribute to the wedding in 2023, the allocation of expenses between the two families is a private family arrangement and does not, without other information, demonstrate that the reported wedding costs were incomplete.

Panel's assessment

118. As regards the gifts, the subject did not provide evidence permitting an exact verification of the declared total amount. The absence of any contemporaneous objective

evidence about the wedding donations and the retention of the funds exclusively in cash limit their traceability. The subsequent statements confirm only part of the total and cannot establish the contributions of the remaining guests.

119. The godparents' financial capacity to make the claimed gift was established. The written responses or statements from the guests that attended the wedding indicated various amounts donated at the wedding, which largely corroborate the overall claimed amount by the subject and the subject's initial average of approximately 231 EUR per guest was not so far removed from the amounts indicated in those statements. Hence, although there is no direct objective evidence confirming the total amount declared by the subject in his 2023 annual declaration as a wedding collection of donations, the totality of information provided by the subject and collected by the Panel dispelled the Panel's serious doubts regarding the collected amount.
120. At the same time, the Panel notes a significant difference between the collected amount of 67,100 EUR and the amount of 22,623 EUR declared for expenses, which implies a total profit from the wedding of 44,477 EUR. The comparison between the gifts received and the costs of organizing the wedding does not, in itself, establish an inconsistency. Wedding gifts are not necessarily limited to reimbursing the cost attributable to each guest and, in the social context described by the subject and corroborated by the written statements, close relatives and family friends may provide additional financial assistance to the newly married couple. The fact that the gifts exceeded the identified expenses by approximately 44,477 EUR therefore does not, without further evidence, indicate that either figure was inaccurate.
121. The exclusively cash-based manner in which the wedding gifts were kept by the subject and the cash-based method through which the wedding was financed raise continuous concerns about the accuracy and transparency of the subject. At the hearing, the subject confirmed that the remaining donations had not been deposited into bank accounts and continued to be kept in cash. This prevented the Panel from tracing the funds after the wedding and from independently reconciling the declared gifts, payments and residual cash balance.
122. Still, the subject declared the gifts in the currencies in which he stated they had been received; the most significant individual gift was independently confirmed; several other guests corroborated gifts in those same currencies; the documented venue expenses were consistent with the subject's account of the wedding expenses; and his parents had sufficient resources to finance the costs attributed to them.
123. Weighing the evidence as a whole, the Panel considers that the subject provided sufficient evidence to dispel the serious doubts that the total wedding gifts were significantly overstated or that the reported expenses were largely incomplete. The remaining concerns refer to the exact quantification and traceability rather than the plausibility of the wedding gifts and wedding expenses as a whole.

124. Accordingly, although the Panel retains concerns arising from the absence of contemporaneous records and the extensive use of cash, those concerns do not amount to serious doubts within the meaning of art. 11 para. (3) lit. a) of Law No. 252/2023 or serious ethical violation under art. 11 para. (2) of Law No. 252/2023.

Issue 4. Examination of the complaint concerning the lease of the municipal land plot on D. Boulevard

125. In October 2022, a media investigation raised concerns regarding the lease and subsequent legal treatment of a municipal land plot situated on D. Boulevard, Chisinau.⁴ The plot, measuring 1,793 m², formed part of the courtyard of several residential buildings and included a children's playground and infrastructure installations belonging to public-utility entities.

126. The publication alleged a broader sequence of irregularities surrounding the land plot. These included uncertainty as to whether the relevant decision of the Chisinau Municipal Council had been validly adopted or existed in complete form; judicial recognition of the alleged decision on the basis of an extract and a letter from the municipal secretary; the municipality's failure to challenge the ensuing court judgments; and the subsequent lease of the plot to S.R.L. "S." at a reportedly low rental price.

127. The same investigation stated that S.R.L. "S.", founded and administered by A.S., had little or no commercial activity, capital or staffing during the relevant period. It also referred to an alleged personal connection between A.S. and V.G., the son of the then Deputy Mayor of Chisinau, Nistor Grozavu, and questioned whether the company had received preferential treatment.

128. Further allegations concerned the registration of a superficies right, contradictory positions taken by the PSA, and possible improper benefits offered or provided to public officials. The publication itself acknowledged that some of the specific corruption allegations reproduced therein were unverified.

129. In 2021, Victor Chironda, a former Deputy Mayor of Chisinau Municipality, submitted a complaint to the APO concerning alleged irregularities related to the plot on D. Boulevard and the conduct of public authorities and private persons involved in the transaction.

130. The complaint was examined within the competence of the APO. The preliminary verification included materials collected by the NAC.

131. On 16 December 2021, on the basis of the materials accumulated and a report submitted by the NAC, the subject issued an order refusing to initiate criminal proceedings. On 15 March 2022, the order was maintained by the superior prosecutor following hierarchical review.

⁴ Available at: <https://www.jurnal.md/ro/news/e2b59e29864608f7/cronica-furtului-unui-teren-sau-cum-primaria-si-app-au-daruit-18-ari-unei-firme-fara-activitate-investigatie.html>.

132. The complainant challenged both prosecutorial acts before the investigating judge under art. 313 of the Criminal Procedure Code. In October 2022, the investigating judge admitted the complaint and annulled the subject's order and the decision of the superior prosecutor.
133. The investigating judge found, in substance, that the preliminary verification had not been sufficiently complete and that further factual clarification was required before a refusal to initiate criminal proceedings could be considered justified. The criticism concerned the scope and sufficiency of the verification measures undertaken.
134. Following the annulment, the matter was re-examined. The latest procedural act identified by the Panel is a prosecutorial order of 15 November 2024 again refusing to initiate criminal proceedings. That order was not challenged and remained in force.
135. In R3–Q4, the Panel asked the subject whether, before issuing his order of 16 December 2021, he had examined circumstances indicating a possible conflict of interest or personal connection between representatives of S.R.L. "S." and the municipal officials involved in the transaction. He was also asked whether he had any personal or professional relationship with the persons concerned.
136. The subject stated that he had not been aware of the media investigation referred to by the Panel, which was published after the prosecutorial acts issued by him and the superior prosecutor. He explained that he had assessed the complaint exclusively on the basis of the materials accumulated in the criminal process, including the NAC report, and that those materials did not, in his assessment, disclose sufficient grounds for initiating criminal proceedings.
137. The subject further stated that he had no personal or professional relationship with A.S., V.G., S.R.L. "S." or any of the public officials involved, and that he was unaware of circumstances capable of creating a conflict of interest or requiring his abstention.
138. The Panel examined whether the subject's conduct was incompatible with the ethical integrity criterion under art. 11 para. (2) lit. a) of Law No. 252/2023. The provisions principally engaged are art. 6.2.4 of the 2016 Prosecutors' Code of Ethics, requiring decisions to be based on an impartial and objective assessment of all pertinent circumstances; art. 6.4.2, requiring prosecutors to remain free from relationships, subjectivity or bias capable of affecting, or appearing to affect, independent decision-making; and art. 6.5.1 and 6.5.2, requiring a high level of professional competence and up-to-date knowledge of the applicable law and practice.
139. The annulment of the subject's order by the investigative judge is relevant because it demonstrates that the verification conducted before the refusal to initiate criminal proceedings was insufficiently complete. Given the public property involved, the alleged irregularity of the municipal decision, the apparently favorable lease terms and the suggested connections between private actors and public officials, the complaint required a careful and professionally thorough examination.

140. However, the materials available to the Panel contain no evidence of a personal or professional connection between the subject and the persons or entities concerned. The Panel does not exclude that the subject's examination of the complaint lacked the degree of diligence and thoroughness warranted by the circumstances, as also indicated by the investigating judge's subsequent findings. Nevertheless, an incomplete or insufficiently rigorous verification does not, in itself, establish a serious ethical violation. In the absence of evidence that the deficiency was deliberate, influenced by improper considerations or indicative of a serious disregard of the subject's professional duties, the Panel considers that the conduct does not reach the level of gravity required to establish non-compliance with the ethical integrity criterion under Law No. 252/2023.
141. The subsequent procedural history further mitigates the issue. After the judicial annulment and additional examination, the competent prosecutor again refused to initiate criminal proceedings by order of 15 November 2024. That order was not challenged.
142. In light of these circumstances, the available evidence does not establish non-compliance with the ethical integrity criterion under Law No. 252/2023.

VI. Conclusion

143. Based on the information it obtained and that was presented by the subject, the Panel proposes that Alexandru CAPMARI passes the external evaluation made according to the criteria set in art. 11 of Law No. 252/2023. At the same time, the Panel reiterates the concerns indicated above about the predominant use of cash by the subject in his daily life, including for significant expenses, which limits the traceability of expenses and does not contribute to the transparency that may be expected from persons in his position to increase the trust in the prosecutorial system.

VII. Further Action and Publication

144. 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.
145. 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.
146. 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).

147. Pursuant to art. 17 para (2) of Law No. 252/2023, this evaluation report was approved unanimously by the evaluation panel on 11 August 2026 and signed by a member of the evaluation panel designated by the Chairperson of the Prosecutor Vetting Commission.

148. Done in English and Romanian.

Signature:

Digitally signed by Hriptievshi Nadejda
Date: 2026.08.13 17:21:12 EEST
Reason: MoldSign Signature
Location: Moldova

MOLDOVA EUROPEANĂ



Nadejda HRIPTIEVSCHI, member of the Panel designated by the Chairperson of the Prosecutor Vetting Commission by email on 11 August 2026 to sign the evaluation report, in accordance with art. 29 para. (6) of the Commission Rules