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EVALUATION REPORT

approved according to Article 25

of the Rules of Organization and Functioning

ION BÎTCĂ

candidate for the Supreme Court of Justice

subject of evaluation under Article 3 para. (1) Law No. 65/2023

16 June 2026

Contents

The Vetting Commission established by Law No. 65/2023 on the External Evaluation of Judges and Candidates for Judges of the Supreme Court of Justice (hereinafter "Law No. 65/2023") deliberated on the matter on 26 May 2026 and approved the following report on 16 June 2026. The members participating in the approval of the report were:

1. Andrei BIVOL
2. Willem BROUWER
3. Lilian ENCIU
4. Iurie GAŢCAN
5. Lavly PERLING
6. Aida-Oana POPESCU
7. Iulian RUSU
8. Gerrit-Marc SPRENGER
9. Marcel van de WETERING

The Commission prepared this evaluation report based on its work in collecting and reviewing the information, the subject's explanations, and its subsequent deliberations.

I. Introduction

1. This report concerns Mr. Ion Bîtcă (hereinafter the "subject"), a candidate for the position of judge of the Supreme Court of Justice.

2. The Commission conducted its evaluation pursuant to Law No. 65/2023 and the Commission's Rules of Organization and Functioning (hereinafter "Rules").

3. The Commission concluded that the subject does not meet the criteria identified in Law No. 65/2023 for financial integrity, as serious doubts determined by facts have been found as to the subject's compliance with this criterion.

II. Subject of the Evaluation

4. The subject has been the Director of the Doctoral School "Legal sciences and international relations" at the University of European Studies of Moldova since 2023.

5. Between 2014 and 2023, the subject served as head of the private law department of the Law Faculty at the University of European Studies of

Moldova (hereinafter "UESM"). In 2016, he became an associate professor at the same university.

6. The subject has held an attorney license since 2010. In 2025, the Moldovan Bar Association suspended his license for his failure to contribute to the Bar Association's budget.

7. The subject received a bachelor's degree in law from Lucian Blaga University in Romania in 1998. In 2005, the subject received a PhD degree in law from Babeș-Bolyai University, Romania.

III. Evaluation Criteria

8. Under Article 11 para. (1) of Law No. 65/2023, the Commission evaluates the subject's ethical and financial integrity.

9. Under Article 11 para. (2), a subject:

> "[…] does not meet the criterion of ethical integrity if the Evaluation Commission has serious doubts determined by the fact that:
>
> a) in the last 5 years, they seriously violated the rules of ethics and professional conduct of judges, prosecutors or, as the case may be, other professions, as well as if they acted arbitrarily or issued arbitrary acts, over the last 10 years, contrary to the imperative rules of the law, and the European Court of Human Rights had established, before the adoption of the act, that a similar decision was contrary to the European Convention for Human Rights;
>
> b) in the last 10 years, has admitted incompatibilities and conflicts of interest incompatible with the office of judge of the Supreme Court of Justice in his/her work."

10. Under Article 11 para. (3), a subject:

> "[…] does not meet the criterion for financial integrity if the Evaluation Commission has serious doubts determined by the fact that:
>
> a) the difference between assets, expenses and income for the last 12 years exceeds, in total, 20 average salaries per economy, in the amount set by the Government for the year in which the judge's evaluation began;
>
> b) in the last 10 years, admitted tax irregularities as a result of which the amount of unpaid tax exceeded, in total, 5 average salaries per economy, in the amount set by the Government for the year in which the judge's evaluation began."

11. Under Article 20 para. (1):

"Candidates for the office of judge of the Supreme Court of Justice shall be evaluated in accordance with the provisions of this law."

12. The applicable rules of ethics and professional conduct for attorneys-at-law in the relevant period were regulated by the:

    a. Law No. 1260/2002 on Attorney Activity;

    b. Statute of the attorney-at-law profession in the Republic of Moldova, adopted by the Lawyer's Union on 29 January 2011;

    c. Code of Ethics for Lawyers of the Republic of Moldova, adopted by the Congress of Lawyers on 20 December 2002, with amendments and additions adopted by the Lawyers' Congress on 23 March 2007 and 1 July 2016.

13. The applicable rules of ethics and professional conduct for academic community in the relevant period were regulated by the:

    a. Law on Education No. 547-XIII of 21 July 1995;

    b. Education Code No. 152 of 17 July 2014;

    c. Code of Ethics of the University of European Studies of Moldova, approved at the Senate meeting on 28 March 2022, Minutes No. 8.

14. The average salary per economy for 2025 was 16,100 MDL. Thus, the threshold of 20 average salaries is 322,000 MDL and the threshold of five average salaries is 80,500 MDL.

15. Article 11 para. (4) of Law No. 65/2023 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, and the origins of the subject's wealth.

16. In evaluating the subject's financial integrity, Article 11 para. (5) of Law No. 65/2023 directs the Commission also to consider the wealth, expenses, and income of close persons, as defined in Law No. 133/2016 on the declaration of wealth and personal interests, as well as of persons referred to in Article 33 paras. (4) and (5) of Law No. 132/2016 on the National Integrity Authority.

17. In assessing a subject's compliance with the ethical and financial integrity criteria, the Commission applies the rules and legal regime that were in effect when the relevant acts occurred.

18. Finally, according to Article 11 para. (2) and (3) of Law 65/2023, the Commission determines that a subject does not meet the ethical and financial integrity criteria if it establishes serious doubts determined by the facts

considered breaches of the evaluation criteria. 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.

19. 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 found that the Superior Council of Magistracy 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).

20. Once the Commission establishes substantiated doubts regarding particular facts that could lead to failure of evaluation, the subject will be given the opportunity to oppose those findings and to submit arguments in defense, as provided by Article 15 para. (1) of Law No. 65/2023. After weighing all the evidence and information gathered during the proceedings, the Commission makes its determination.

IV. Evaluation Procedure

21. On 19 November 2025, the Commission received the information from the Superior Council of Magistracy pursuant to Article 21 para. (5) lit. a) of Law No. 65/2023. The information included the subjects' candidacy for the Supreme Court of Justice.

22. On 20 November 2025, the Commission notified the subject and requested that he complete and return an ethics questionnaire and the declarations as provided in Article 12 para. (3) of Law No. 65/2023 within 10 days from the date of notification (hereinafter, these declarations are referred to as the "five-year declaration"). The subject returned the completed five-year declaration and questionnaire on 26 November 2025.

23. Because the law sets out different evaluation periods for the ethical and financial integrity criteria cited above, the Commission evaluated compliance with these criteria over the past five, ten and 12 years, respectively. Due to the end-of-the-year availability of the tax declarations and declarations on wealth and personal interests, the financial criteria

evaluation period included 2013-2024 and 2015-2024. The evaluation period for the ethical criterion includes the past five or ten years calculated backward from the date of the notification.

24. In the last 12 years of the evaluation period, the subject did not have an obligation to submit declarations, neither under Law No. 133/2016 on the Declaration of Wealth and Personal Interests, nor under Law No. 1264/2002 on the Declaration of Income and Property Control for persons with positions of Public Dignity, Judges, Prosecutors, Civil Servants, positions of Management. The subject's wife was required to submit declarations during the last three years of the evaluation period.

25. The Commission sought and obtained information from numerous sources. No source informed the Commission of later developments or any corrections regarding the information provided.

26. The sources asked to provide information on the subject included the General Prosecutor's Office, the Anti-Corruption Prosecutor's Office, the Prosecutor's Office for Combating Organized Crime and Special Cases, the Ministry of Internal Affairs, the National Anticorruption Center, the National Integrity Authority (hereinafter "NIA"), the State Fiscal Service (hereinafter "SFS"), the National Office of Social Insurance (in Romanian: *Casa Națională de Asigurări Sociale*, hence hereinafter – "CNAS"), the General Inspectorate of Border Police, banks (Comerțbank JSC, Energbank JSC, EuroCreditBank JSC, Eximbank JSC, Moldinconbank JSC, MAIB JSC, Procredit Bank JSC, Victoriabank JSC, Banca de Finanțe și Comerț (FincomBank) JSC, OTP Bank JSC), the Office for Prevention and Fight Against Money Laundering, and the Public Service Agency (hereinafter "PSA"). Information was also obtained from other public institutions and private entities, open sources such as social media and investigative journalism reports. No complaints or information was received from civil society. All information received was carefully screened for accuracy and relevance.

27. On 19 January 2026, the Commission asked the subject to provide additional information by 30 January 2026 to clarify certain matters (hereinafter the "first round of questions"). The subject provided answers and documents within the deadline.

28. On 23 February 2026, the Commission asked the subject to provide additional information by 4 March 2026 to clarify certain matters (hereinafter the "second round of questions"). The subject provided answers and documents within the deadline.

29. On 14 April 2026, the Commission asked the subject to provide additional information by 24 April 2026 to clarify certain matters (hereinafter the "third round of questions"). The subject provided answers and documents within the deadline.

30. On 15 May 2026, the subject was notified that the Commission identified some areas of doubt about the subject's compliance with the ethical and financial criteria and invited him to attend a public hearing on 26 May 2026. The subject was also informed that the evaluation report may refer to other issues that were considered during the evaluation.

31. As provided in Article 24 para. (4) of the Rules, the subject could have requested access to all the materials in his evaluation file at least seven days before the hearing. However, the subject decided not to exercise this right.

32. On 18 May 2026, the subject submitted a request for a closed hearing regarding the circumstances of the 2005 sale of immovables in Orhei. The Commission granted the request and determined to hold part of the hearing in closed session.

33. On 26 May 2026, the Commission held a public hearing. At the hearing, the subject reaffirmed the accuracy of his answers in the five-year declaration and the ethics questionnaire. He also stated that he had no corrections or additions to the answers previously provided in response to the Commission's requests for information. He requested that his wife be heard as well. The Commission granted the request and heard his wife in closed session.

34. After the hearing, on 28 May 2026, the subject submitted additional documents. The Commission included them in the evaluation file and considered them in its analysis.

V. Analysis

35. This section discusses the relevant facts and reasons for the Commission's conclusion.

36. Based on the information it collected, the Commission analyzed and, where necessary, requested further clarifications on the matters which, upon initial review, raised doubts as to compliance with the criteria established by law:

    a. potentially non-transparent transactions with immovables;

b. difference between the assets, expenses, and income (hereinafter "unjustified or inexplicable wealth") for 2013-2016, 2018, 2020, 2022 and 2024.

37. The first matter did not lead to the proposal of non-promotion of the evaluation. Conversely, the last serves as separate ground for non-promotion.

A. Potentially non-transparent transactions with immovables

A.1. Sale of immovables in Orhei (Chiperceni)

38. The subject sold on 26 June 2019 two plots of land and a construction in Orhei, Chiperceni commune: agricultural land of 0.3848 ha and 0.0612 ha, and a construction of 82.1 sq.m.

39. The contractual price for these immovables was 15,000 MDL. However, the SFS income tax form for 2019 submitted by the subject (CET A/2019) indicated that he received, based on a sale contract, an income of 45,000 MDL.

40. In the first round of questions (question 4) and second round of questions (question 1), the subject replied that the actual price for the sale of the immovables in 2019 was 15,000 MDL. He stated that he does not have a reasonable explanation for the 2019 income tax form, which reflected a sale value of immovables of 45,000 MDL.

41. The subject explained that he purchased the assets at a public auction in 2002 (minutes of 16 August 2002). According to him, at the time of acquisition, the construction was identified as the former "tractor brigade house" (*casa brigăzii de tractoare*) and was in an "advanced state of degradation". The purpose of the acquisition was to establish a livestock farm by his parents-in-law. As this purpose was not achieved, the subject said he sold these assets by a "verbal agreement" for 15,000 MDL in 2005.

42. The 2005 transaction was not formalized, and the subject remained the legal owner until 2019. He explained that the buyer at that time, C.M., did not want his name to be indicated in the real estate register. The subject said he had nothing to lose by accepting the buyer's condition.

43. In the same round of questions (round 1, question 4), the subject indicated that he signed the sale-purchase contract authenticated by a notary n 26 June 2019. He explained that the uncertainty surrounding the property had become burdensome for both him and his in-laws, so they decided to formalize the existing situation. The contract identified A.D. as the buyer, as

the original buyer from 2005, C.M., no longer wanted the property and had asked the subject to conclude the contract directly with A.D.

44. In the second round (question 1 lit. d), the subject characterized his omission to submit the declaration to the tax authority regarding the income obtained in 2005 as "an erroneous assessment of the extent of the applicable tax obligations". He acknowledged that "ignorance or misinterpretation of the law does not remove legal liability".

45. According to cadastral records, the subject acquired a 0.3848 ha plot of land under a sale-purchase contract dated 19 September 2018. The land had been awarded to him at a public auction on 5 September 2018 for 6,775.08 MDL. The subject had previously, on 16 June 2004, acquired the 0.0612 ha plot of land and the building thereon of 82.1 sq.m.

46. In the third round of questions, the subject was asked how, in 2005, he could have sold a land plot he had acquired only in 2018. The subject explained that, in 2002, when he purchased the immovables, he did not know their exact extent, and that part of what he thought he had purchased did not belong to him (question 9 lit. a). The subject's exact statements are:

> "The preparation of the documents was managed by my father-in-law, who was also the one paying the taxes. After the work by the company of C.M. began, I found out about the real situation of the land, for which reason I asked my father-in-law to initiate the necessary steps to acquire the ownership right over that land. In the meantime, my father-in-law passed away in 2015."

47. The cadastral information and the subject's explanations show that the subject obtained ownership rights over the two plots of land and the construction in different years. As the agricultural land of 0.3848 ha was registered in the subject's name on 19 September 2018, it is not possible that it was sold in 2005, as claimed by the subject.

48. At the hearing, the subject stated he takes responsibility for the confusion that had been caused. The subject explained that the only cash received for the sale of the two plots of land and the construction was 15,000 MDL in 2005. As to the 45,000 MDL declared to the SFS in 2019, he said that he did not receive this sum. He believes this sum resulted from the value of the assets included by the notary in the 2019 sale contract.

A.2. Acquisition of immovables in Orhei (Camencea and Chiperceni)

49. The subject acted as a buyer in a series of sale-purchase contracts, without, according to him, bearing the contractual price.

50. According to the cadastral data, during the evaluation period, the subject acquired several immovables in the village of Camencea, Orhei. These are:

- in 2015, two garden plots of land of 0.1527 ha and 0.2075 ha at a total price of 3,600 MDL;
- in 2016, two garden plots of land of 0.0527 ha and 0.0652 ha at a total price of 2,500 MDL;
- in 2020, a plot of land of 0.1435 ha and a construction of 108.6 sq.m. at a total price of 34,000 MDL;
- in 2020, two garden plots of land of 0.1706 ha and 0.0666 ha at a total price of 3,000 MDL.

51. In 2022, the subject acquired a 0.3781 ha garden plot in Orhei, Chiperceni commune, for 15,000 MDL.

52. In response to the first round of questions (question 10 lit. b), the subject stated that he received several "indirect donations" from his mother. He referred to the immovables above-mentioned in Camencea (Orhei). Although the subject has the status of buyer in the sale-purchase contracts from 2015, 2016, 2020, the subject stated that his mother covered the acquisition expenses.

53. Regarding the 2022 sale-purchase contract for the land in Chiperceni, the subject stated that it represented "a method of early division of the assets by the mother-in-law. In fact, that contract represented a simulated donation from the brother-in-law. I did not pay the money" (first round, question 10 lit. b and third round, question 6).

54. At the hearing, the subject stated that "the simulation is not an illegal transaction". When asked whether the transactions had been transparent, he replied that, having explained the relevant factual and legal circumstances, he considers them to be transparent. He requested that immovables expenses be excluded from his outflows. According to the subject, those transactions were, in fact, donations. As regards the reasons for concluding sale-purchase contracts, the subject explained that this arrangement was more convenient for his family. He added that the plot of land concerned by the 2022 transaction was intended to be donated to his wife. At that time, she was working at a lyceum and did not have the flexibility to leave work and travel to the notary when needed. For this reason, the subject went to the notary instead. Since he was not the intended recipient of the donation, the parties concluded a sale-purchase contract.

A.3. Commission's assessment

55. At the relevant time, the subject was an associate professor at the UESM, head of the private law department of the Law Faculty and a non-practicing attorney. The Code of Ethics of UESM sets standards of professional ethics for the academic community, such as competence, integrity, and responsibility. This involves conscious commitment to carrying out any activity with probity and consistency.

56. The Commission does not find the subject's explanation that several immovable property acquisitions were in fact "indirect donations" to be credible. In particular, regarding the 2022 transaction, the subject himself characterized the sale-purchase contract as a simulated donation, yet his explanation for why a donation contract was not concluded is unconvincing. Notably, in 2018, when the subject's wife received a genuine donation from her mother, the parties formalized the transaction through a donation contract.

57. The Commission further notes that legal certainty and transparency require that transactions reflect the parties' true intentions. Under Article 1090 para. (1) of the Civil Code, in force at the relevant time, "a simulated contract does not produce effects between the parties". If the true nature of the transactions had differed from that reflected in the official documents, this could itself have raised concerns regarding ethical integrity, and the 2022 transaction would have fallen within the five-year period for the evaluation of ethical integrity, as provided by Article 11 para. (2) lit. a) of Law No. 65/2023.

58. In the absence of evidence, other than his own statements, supporting the subject's account, the Commission treats the transactions as reflected in the sale-purchase contracts and the registry of immovable assets and attributes the corresponding acquisition costs to the subject's household. The subject's characterization of the transactions as donations appears aimed at excluding these expenses from the calculation of potential unexplained wealth, but it was not supported by convincing evidence.

59. Because this characterization was not accepted, the above-mentioned circumstances claimed to have taken place in relation to the sale-purchase contracts do not constitute grounds for finding that the subject fails to meet the ethical integrity criterion.

B. Inexplicable wealth for 2013-2016, 2018, 2020, 2022, 2024

60. In its preliminary analysis, the Commission established inexplicable wealth for the years 2013, 2014, 2015, 2016, 2018, 2020, 2022 and 2024. The difference between the income and the expenses (negative balance) in these years was:

Year	Accumulated Inexplicable Wealth
2013	- 131,418 MDL
2014	- 74,001 MDL
2015	- 83,578 MDL
2016	- 149,135 MDL
2018	- 141,198 MDL
2020	- 27,651 MDL
2022	- 37,057 MDL
2024	- 104,366 MDL
Total:	**- 748,404 MDL**

61. Following the additional explanations provided by the subject at the hearing regarding potential duplication of expenses (§§ 108-116 below), a loan granted to the brother-in-law (§§ 159-160 below) and claimed income earned in Italy by the wife (§§ 68-78 below), the Commission updated its preliminary calculations. The total difference between the income and expenses in the above-mentioned years is -468,956 MDL, as will be reflected at the end of this section (§ 220 below). Before addressing the inexplicable wealth on a year-by-year basis, this report will first examine specific issues relating to the financial situation of the subject's household.

B. 1. Donations granted by the subject's sister from 2013 to 2018

62. The subject stated that between 2013 and 2018, he received yearly donations of 1,000 EUR from his sister (L.B.). In the first round of questions (question 1), the subject stated that L.B. donated 1,000 EUR annually to his household to care for their mother. In the same round (question 10), he added that the sister and her husband provided the subject with the above-mentioned sums as donations. He claimed that this was a "small help to finish building the house". From his answers, it was unclear which sums purportedly received from his sister were directed toward building the house and which were directed towards caring for their mother.

63. Also, in the first round of questions, the subject claimed that, in addition to the sums given to his household, his sister purportedly gave additional sums ranging from 500 EUR to 1,000 EUR annually to their mother. In the second round of questions (question 7), the subject stated that his mother also received financial help from both his sisters, L.B. and S.I. (who the latter lives in Spain), each providing up to 1,000 EUR annually.

64. In the third round of questions (question 1), the subject presented the sister L.B.'s written statement dated 18 April 2026, in which she reaffirmed the 1,000 EUR annual donations. The subject explained that the purpose of those donations was initially to provide financial support for the construction of the subject's house. However, given the subject's refusal to accept those funds for personal reasons, the sister and her husband indicated that the funds could be used in the event of unforeseen circumstances, including to provide financial support to their mother.

65. To corroborate the donor's financial capacity, the subject provided his sister L.B.'s bank statements from Greek banking institutions, where she receives her salary. According to these, throughout the period 2013-2018, L.B. registered annual cash withdrawals ranging from approximately 3,500 EUR to 5,500 EUR. The bank statements also reflect the annual retail expenditure, which, as the subject outlines, covered part of the donor's current and living expenses abroad.

Year	Total credit, EUR	Total retail expenses, EUR	Total cash withdrawals/ATM, EUR
2013	10,000-12,000	5,000-6,500	3,500-5,500
2014	10,000-12,000	5,500-,7000	3,500-5,500
2015	10,000-12,000	6,000-7,500	3,500-5,500
2016	11,000-13,000	6,000-7,500	3,500-5,500
2017	11,000-13,000	6,000-7,500	3,500-5,500
2018	10,000-12,000	6,000-7,500	3,500-5,500

66. Additionally, the subject provided information regarding the sister's family composition and the expenses incurred for her family's living arrangements (rent and other costs). Finally, the subject provided the costs incurred by his sister's family for the acquisition of an apartment (around 50,000 EUR) and

a vehicle in Greece (around 3,500 EUR). The main incoming and outgoing flows of L.B. in 2010-2021 were described in the hearing notice (§ 28).

67. Based on the explanations and documents provided by the subject, it follows that L.B. had the financial capacity to grant to the subject's household the yearly donations of 1,000 EUR. The plausibility of the donations is based on the identified financial capacity of his sister, as evidenced by the consistent annual cash withdrawals registered on her bank account in Greece (ranging from 3,500 EUR to 5,500 EUR), as well as the confirmation relating to her family's coverage of the annual current/living expenses (as identified in the retail banking transactions). An important aspect to note is that the sister's husband was also a financial contributor to their household, although the extent of his earnings is unknown to the Commission. These considerations reinforce the assumption that the sister's household had the overall financial capacity.

B.2. Claimed earnings from abroad by subject's wife (prior to 2018)

68. In the first round of questions (question 7), the subject claimed that between 2013 and 2018 his wife periodically worked abroad in Italy, particularly during the summer, autumn and winter holidays. He explained that his wife replaced her relatives working in Italy and, in necessity, one of their neighbors from Durlești. The subject claimed that his wife earned annual sums ranging from 4,000 EUR to 8,000 EUR from her work abroad. He claimed that some of the funds were transferred via bank transfers, but most of it was brought into the country personally by his wife in cash. The subject did not provide any evidence to corroborate the claim of funds being transferred via bank transfers or cash being introduced into the country.

69. In the second round of questions (question 2), the subject was asked again to provide more details about the claimed income. Specifically, he was requested to provide the exact periods of work abroad, the residential address, the employment contract, the employer's details, the bank account statement on which the salary was credited, pay slips, and any other fiscal and customs declarations. The subject was also requested to provide information about his wife's living arrangements and the costs incurred for rent and other living expenses. In reply, the subject identified the towns in Veneto and Lombardia regions where she worked and the relatives (D.B., V.B. and L.M.) which his wife temporarily replaced or who offered her work. He further stated that he has no evidence confirming receipt of the claimed income from his wife's work abroad. According to his statement, the wife's

average monthly income ranged from 1,200 EUR to 1,800 EUR. He did not provide any information on how many months she worked each year.

70. The subject explained that his wife benefited from employer-provided accommodation and, as a result, did not incur rent expenses. As regards food, transportation and other expenses, the subject claimed that these costs were also covered by the employer. The subject did not provide the exact address of the employer because, as he stated, his wife worked illegally and, for that reason, there were no documents to prove her place of work.

71. In the third round of questions, the subject submitted written declarations dated 17, 18, and 20 April 2026 from four persons (V.B., E.B., M.P. and L.M.) who stated that the subject's wife temporarily replaced them or their acquaintances in the period 2007-2018 and in 2021.

72. At the hearing, the subject's wife stated that her annual income in Italy was approximately 8,000 EUR from 2013 to 2015. In 2016 and 2018, she stated that her average annual income was from 6,000 to 8,000 EUR. During this period, she said that she worked in Veneto region. Her duties included caring for elderly people, cleaning (in her free time), and helping at the family-owned store. According to the subject's wife, she worked for approximately two and a half months per year, between June and August. The expenses incurred were minimal (around 150 EUR), primarily for children's clothing.

73. When asked during the hearing to provide her old passports, the subject's wife stated that she had traveled to Italy using her Romanian identity card.[1]

74. After the hearing, the subject submitted additional documents to support his wife's stay in Italy. Namely, an Italian certificate of tax identification number assignment dated 8 May 2012, a medical prescription noting her name dated 16 August 2013, a payment receipt for an Italian mobile phone number (the date is ineligible), and a Moldavian medical certificate from 2021. In the written statement dated 28 May 2026, the subject provided the exact addresses and the names of persons (S.T., C.C., L.B.) at whom his wife worked in Italy, but without contact details, such as a phone number or e-mail.

[1] Article 23 para. (4) of the Law on the State Border, as in force at the relevant time, provided that the travel documents could be stamped upon request; however, such stamping was not mandatory.

In addition, the Romanian citizens are allowed to cross the border of the Republic of Moldova using identity card only since June 2015 (see, Government Decision No. 395 of 16 June 2015).

75. The Commission accepts that the available evidence demonstrates that the subject's wife was present in Italy in 2012 and 2013. This evidence may also indicate her presence in subsequent years; however, it is not sufficient to establish this with certainty for the period between 2014 and 2018. The evidence does not, on its own, establish receipt of the claimed income.

76. The subject's account of his wife's income appears unsupported and inconsistent. He estimated her annual earnings at between 4,000 EUR and 8,000 EUR, whereas his wife stated they were around 8,000 EUR in some years and from 6,000 EUR to 8,000 EUR in others (see § 72 above). No evidence was provided to substantiate the alleged income, although the subject could have submitted travel records (copies of old passports), written statements from Italian families involved, or the contracts of the relatives the wife allegedly replaced to help establish her likely earnings.

77. Absent any convincing evidence of the wife's actual earnings, the Commission cannot include the claimed income in its calculation of household inflows. Publicly available data indicate that the average minimum monthly remuneration of experienced domestic workers, housekeepers, and caregivers in Italy during the relevant period was 815.11 EUR.[2] On that basis, her estimated income for a two-and-a-half-month period would have been 2,038 EUR, as indicated in the table below.

Year	2013	2014	2015	2016	2017	2018
Income, MDL	34,080[3]	37,974[4]	42,590[5]	44,948[6]	42,448[7]	40,442[8]

78. The income from work in Italy, as estimated based on statistical data, does not include the additional income allegedly earned during free time. In the absence of sufficiently detailed (e.g. number of hours worked and exact hourly earnings) and verifiable information, the Commission is unable to quantify or include any such income.

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[2] The sum of 815,11 EUR is the average between the 772,28 EUR minimum salary of employees of the category B (qualified domestic worker) in 2013 and 857,94 EUR minimum salary of employees of the category BS (caregiver for independent elderly persons) in 2018. This is available on the following link https://www.webcolf.com/risorse/paghe-e-contributi-annuali/tabella-paga-minima-colf-badanti.html

[3] Based on the NBM average exchange rate of 16,7241 MDL in 2013

[4] Based on the NBM average exchange rate of 18,6328 MDL in 2014

[5] Based on the NBM average exchange rate of 20,898 MDL in 2015

[6] Based on the NBM average exchange rate of 22,0548 MDL in 2016

[7] Based on the NBM average exchange rate of 20,8282 MDL in 2017

[8] Based on the NBM average exchange rate of 19,8442 MDL in 2018

B.3. Construction costs for the house in Durlești

79. In the first round of questions (question 26), the subject stated that he and his family members have lived in the house located in Durlești city, Chișinău municipality, since 2009. The construction began in 2004 and is continuing.

80. The subject's five-year declaration submitted to the Commission indicates that the house was valued at 666,561 MDL in 2014, which corresponds to the cadaster evaluation. In the third round of questions (question 2), the subject provided the approximate annual expenses for the construction works, as evidenced below in EUR.

2009	2010	2011	2012	2013
10,000	10,000	from 4,000 to 8,000	from 4,000 to 8,000	from 4,000 to 8,000
2014	**2015**	**2016**	**2017**	**2018**
from 4,000 to 8,000	from 4,000 to 8,000	from 4,000 to 8,000	from 4,000 to 8,000	from 4,000 to 8,000

81. Although in the first round of question (question 5, lit. a), the third round of questions (question 2, lit. b) and at the hearings the subject linked the construction expenses primarily to his wife's income from periodical work in Italy and donations from his sister, the analysis in §§ 68-78 above shows that the wife's estimated income from such work, based on statistical data, could not have credibly reached 4,000 EUR per year. The Commission nevertheless included the minimum declared expenses of 4,000 EUR in its calculations, given that the subject estimated the expenses between 4,000 EUR and 8,000 EUR and did not provide specific figures per year.

82. Had the median (6,000 EUR) or the maximum declared amount (8,000 EUR) been included in the calculations, the total outgoing financial flows for the period 2013–2018 would have increased significantly.

B.4. Donation of 5,000 EUR from mother-in-law in 2023

83. In his five-year declaration, the subject declared a donation of 5,000 EUR from his mother-in-law (L.V.).

84. In the first round of questions (question 8), the subject explained that the donation was intended to help cover the acquisition cost for the Lexus RX450H. He stated that his mother-in-law provided the loan in August 2023 from her pension savings. According to him, the funds were transferred in cash with no written agreement. He further stated that, since 2018, his

mother-in-law's pension, paid into her Moldinconbank account, had been withdrawn by his wife.

85. The mother-in-law's bank account at Moldinconbank was credited with a total of 192,631.82 MDL during the period 2018-2024, consisting of pension and other income. Even if the withdrawals were made by the subject's wife, this does not exclude the possibility that the funds were subsequently handed over to the mother-in-law.

86. When confronted in the second round of questions (question 4) with the analysis of his mother-in-law's income and expenses, the subject stated that she spent only a small portion of her pension and that her expenses were covered by income from the sale of household products, including wine, oil, and cereals. He further stated that she earned income from caring for a relative (A.C.), whose son resided in Portugal and periodically sent money. According to the subject, she also had income from the sale of agricultural lands and a Honda. The subject did not submit any evidence to substantiate these statements.

87. In the third round of questions (question 7), the subject stated that, following discussions with his mother-in-law, he had learned that the funds donated to him represented savings accumulated by her and her husband throughout their life. In support of this statement, he submitted a declaration signed by his mother-in-law on 19 April 2026. The subject further explained that his wife's withdrawals of the mother-in-law's pension occurred once every two to three months and amounted to approximately 7,000-8,000 MDL, which were subsequently converted into EUR.

88. The Commission notes that the subject provided different explanations regarding the source of the funds during the rounds of questions. This inconsistency undermines the credibility of his explanations.

89. To assess the mother-in-law's capacity to make the donation, her income and expenses were analyzed for the period preceding the alleged donation in August 2023. Based on available information, she received a monthly pension ranging from 1,088.92 MDL to 2,838,56 MDL during the period 2013-2023, totaling 212,850 MDL (see § 49 of the hearing notice).

90. In 2015, 2016, 2018 and 2019, the mother-in-law received income totaling 259,417 MDL from a company engaged in the wholesale trade in raw agricultural products. On 16 September 2022, she received 38,000 MDL from the sale of a Hyundai H200, m/y 2001. In addition, she received social payments totaling 14,500 MDL, consisting of 1,100 MDL (2015), 350 MDL

(2018), 2,050 MDL (2019), 2,500 MDL (2020), 2,900 MDL (2021), 3,500 MDL (2022), 2,100 MDL (2023).

91. The Consumption Expenses for Population level (hereinafter "CEP")9 attributable to the mother-in-law exceeded her pension income throughout the period under review. Her total CEP from 2013, when it was 40,771 MDL, until August 2023, when it was 26,702 MDL[10], amounted to 345,068 MDL. This is inconsistent with the subject's explanation in the first round of questions that the donation originated from pension savings (see § 84 above). Her pension income alone (see § 89 above) was insufficient to cover her basic living expenses as reflected by the CEP.

92. As regards the additional sources of income referred to by the subject in the second round of questions (question 4), namely the sale of household products, income from caring for a relative, and the sale of property, no supporting evidence was submitted. According to cadastral data, at the time the donation was allegedly made in August 2023, the mother-in-law owned a plot of land measuring 0,0811 ha, a house measuring 167,4 sq.m., and two ancillary buildings in Chiperceni village (Orhei). No immovables were identified to have been sold by his mother-in-law after 2015.

93. As noted in §§ 89-90 above, the total verifiable income received by the mother-in-law during the period under review was 524,767 MDL (212,850 MDL+259,417 MDL+38,000 MDL+14,500 MDL). Given that her total CEP for

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[9] The CEP for any year between 2006-2018 is calculated based on National Bureau of Statistics ("NBS") methodology, available on the NBS website here: [Consumption expenditures average monthly per capita by Years, Expenditure group, Area, Children in household and Unit. PxWeb (statistica.md)](). This link is reached from the home page of the NBS website following these steps (tabs): - Statistics by theme – Society and social conditions - Living standard of population - Stat bank - Population expenditure – Discontinued series - Household expenditures (2006-2018, based on resident population) - Consumption expenditures of population by purpose of expenditures, number of children in household and area, 2006-2018.

On the above link, the following variables were selected: 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 was multiplied by the number of family members and then was further multiplied by 12 calendar months.

The CEP for any year between 2019-2024 is calculated based on NBS methodology, available on the NBS website here: [Consumption expenditures average monthly per capita by Years, Expenditure group, Area, Children in household and Unit. PxWeb (statistica.md)](). This link is reached from the home page of the NBS website following these steps (tabs): - Statistics by theme – Society and social conditions - Living standard of population - Stat bank - Population expenditure - Consumption expenditures of population by purpose of expenditures, number of children in household and area, 2019-2024.

On the above link, the following variables were selected: 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 was multiplied by the number of family members and then was further multiplied by 12 calendar months.

[10] (CEP 2023) 26,702 MDL=45,775/12x7 months (the donation was declared to be granted in August 2023)

the same period was 345,068 MDL, she would have retained a balance of 179,699 MDL. The subject's mother-in-law had two children and was 70 years old at the time of the alleged donation.

94. Although the alleged donation appears to have been possible given the financial capacity identified after the subject's revised responses, whether the donation is accepted as an incoming financial flow does not affect the financial balance of the subject's household for the period of evaluation. The subject's household maintains a positive balance in 2023.

B.5. Income earned in Switzerland in 2023 by the subject

95. In the first round of questions (questions 9 and 31), the subject explained that to finance the acquisition of the Lexus RX450H, he went to work abroad in Switzerland. He claimed to have returned home with around 5,000 EUR.

96. In the second round of questions (question 6), the subject claimed that he left for work in Switzerland on 26 May 2023 and returned to the Republic of Moldova on 16 July 2023 and submitted an extract from the Border Police highlighting the subject's exits and entries throughout 8 August 2021 to 20 July 2025.

97. The subject provided a document certifying the notification to the Swiss authorities of his short-term stay for the period from 1 June 2023 to 30 August 2023. The document shows the name and address of the company – *tempo X, Personalverleih,* Albisriederstrasse 252, postcode 8047, Zurich. He also claimed that his weekly income was around 1,000 EUR and he worked there for a month and a half. Additionally, the subject claimed that the salary was paid through V.V.'s bank account (his brother-in-law) and that the latter gave the money in cash after their withdrawal. Furthermore, the subject indicated that he resided in Switzerland, in Dulliken, on Wolfacker Street, postal code 4657. The rent was 500 CHF, which included utilities.

98. In the third round of questions (question 7), the subject provided evidence from the employer *tempo X Personaldienstleistungen AG* (Albisriederstrasse 252, Zurich), confirming his employment and the salary he received during June-July 2023 (approximately 4,400 CHF net). He also explained that his daily expenses were covered from the funds he brought with him from the Republic of Moldova and, in case of necessity, used his Romanian credit card No. 601RON****0601 (Banca Transilvania). The Commission identified payments of est. 310 EUR.

99. At the hearing, the subject clarified that the amount earned of 4,400 was in CHF, not in EUR, corresponding to around 5,000 EUR. He also provided

details regarding the approximate living expenses incurred during his stay in Switzerland. According to his statements, he traveled to Switzerland with approximately 500 EUR brought from the Republic of Moldova and returned with 150 EUR remaining.

100. Based on the explanations and evidence provided by the subject, the declared income of 5,000 EUR from his work abroad, equivalent to approximately 98,267 MDL (according to the NBM average exchange rate for June - July 2023), was included in the subject's household incoming financial flows for 2023.

B.6. Expenses related to daily maintenance

101. As explained in point 3.5. of the Annex to the Rules, a subject's basic daily living expenses are calculated using estimates of population consumption expenditure ("CEP"). These estimates are provided by the National Bureau of Statistics (hereinafter "NBS") and reflect how much people spend on everyday needs based on surveys of the actual expenditures incurred by randomly selected households. The Commission calculated the daily maintenance expenses of the subject's household based on CEP estimates during the evaluation period 2013-2021.

102. In the third round of questions (questions 1 and 2), the subject argued that the estimated CEP for 2013 and 2014 does not reflect his family's actual expenses. He stated that, during that period, his family received food support from his mother and in-laws. He referred to a similar explanation provided in the first round of questions (question 29). However, the subject did not provide concrete evidence and quantifiable numbers to support this claim.

103. At the hearing, the subject reiterated their disagreement with the level of CEP in 2013, 2014, and added 2015. When asked to provide actual maintenance expenses, he indicated approximated annual values, namely up to 60,000 MDL in 2013, 50,000 MDL in 2014 and 70,000 MDL in 2015.

104. As clarified by the Supreme Court of Justice (hereinafter "SCJ"), the Commission cannot be expected to know the value of goods received gratuitously or at prices significantly below market value. The burden lies with the evaluated person to justify any claimed reduction in consumption expenditures in line with the 12 categories established by the NBS (Decision of 16 August 2024, *Irina Iacub v. Superior Council of Magistracy*, § 60).

105. In a more recent decision, the SCJ explained that the claimant failed to provide a detailed methodology for calculating the suggested reductions to

the CEP. Although the claimant argued that the CEP should be reduced because the in-laws provided support in the form of food, footwear, and clothing, this assertion was not accompanied by any clear or measurable calculation to substantiate the proposed reductions (Decision of 4 March 2025, *Andrian Ciobanu v. Superior Council of Magistracy*, § 75).

106. In the present case, although the subject claimed that his family received food products from his parents, he provided specific figures only when asked twice during the hearing. Considering this and in the absence of a clear calculation methodology or concrete evidence supporting his statements, the Commission did not accept the subject's request to reduce the CEP level.

107. In 2022, 2023, and 2024, the subject's household incurred substantial expenses through bank accounts for goods and services that significantly exceeded the levels indicated by CEP. Accordingly, the Commission relied on more reliable sources, such as bank transactions, to determine consumption expenditures and did not apply the annual CEP estimates for the last three years of the evaluation period.

B.7. Potential duplication of expenses in 2022 and 2024

108. After the hearing, the subject submitted a written declaration, dated 28 May 2026, claiming duplication of expenses in 2022 and 2024. Although he submitted statements of his Victoriabank account No. 2259****4584 for 2022 and 2024 and his wife's Moldinconbank account No. 2259****8981 for 2022, the subject did not identify the specific expense entries in the bank statements that he alleges were double counted.

109. For 2022, the subject requested the reduction of the retail expenses of 206,1320 MDL on the grounds that certain expenditures had been counted twice. Specifically, he referred to:

(i) his son's education expenses in Romania of 42,700 MDL;

(ii) travel-related expenses incurred during a trip to Romania, including fuel costs and gifts for the children's godparents, totaling 3,091 MDL; and

(iii) house renovation expenses of 30,000 MDL, although the total renovation costs were declared at 40,000 MDL, the subject stated that the remaining 10,000 MDL had been paid in cash.

110. For 2024, the subject similarly requested the reduction of the retail expenses of 351,056 MDL on the grounds of duplication, namely:

(i) expenses incurred in connection with the death of the wedding godfather of 26,400 MDL, which he claimed were subsequently reimbursed;

(ii) his son's education expenses in Romania of 68,100 MDL;

(iii) fuel and other expenses incurred during travel to Romania of 6,760 MDL; and

(iv) house renovation and repair expenses of 30,000 MDL.

111. Having reviewed the bank account statements of both the subject and his wife, the Commission identified expenditure on construction materials and household expenses, as detailed in the table below. These total expenses were 3,313.38 MDL in 2022 and 7,544.39 MDL in 2024.

Victoriabank account no. 2259**4584 (subject)**		
Date	Amount, MDL	Retailer
07 October 2022	2,251.38	ROMSTAL
5 August 2024	2,116.09	PROFMET GRUP
5 August 2024	1,240.90	SUPRATEN
8 June 2024	1,318.40	ZIKKURAT MARKET
5 April 2024	1,056	JYSK
Moldinconbank account no. 2259**8981 (subject's wife)**		
10 December 2022	1,062	COVOARE
02 August 2024	1,813	JYSK

112. To avoid double counting the house renovation expenses declared for 2022 (40,000 MDL) and 2024 (38,000 MDL), the amounts identified in the bank accounts, as described above, were deducted from the declared renovation expenses. As a result, the adjusted house renovation expenses are 36,687 MDL in 2022 and 30,456 MDL in 2024.

113. As regards the son's education expenses in Romania, the analysis of the bank accounts shows debit transactions described as retail expenses and P2P transfers. The latter represent direct money transfers between individuals, including SWIFT transfers, and are recorded separately from the retail expenses. The subject's bank account reflects P2P transfers of 28,566 MDL in 2022 and 60,797 MDL in 2024. Some of these transfers may have been made

to the subject's son in Romania. It follows that the son's education expenses in Romania are not duplicated by the retail expenses attributed to the subject's household, since P2P transfers are reflected separately in the account statements as debit transactions.

114. As regards the bank account expenses incurred during the trip to Romania from 22 July 2022 to 26 July 2022, the Commission identified potential instances of double counting concerning fuel-related expenditures (PECO, Vento) and other expenses (duty-free, Palas Market), totaling 1,692 MDL. This amount was deducted from the subject's declared total travel expenses of 10,000 MDL, resulting in adjusted expenses of 8,308 MDL in 2022.

115. As regards the bank account expenses incurred during the trip to Romania from 14 August 2024 to 18 August 2024, the Commission identified potential instances of double counting concerning fuel-related expenses (PECO) and other expenses (entertainment tickets, restaurants, and shops) of 3,276 MDL in the subject's bank account and of 3,425 MDL in his wife's bank account. The total of 6,701 MDL was deducted from the declared travel expenses of 13,500 MDL (in the third round of questions, question 8), resulting in adjusted expenses of 6,799 MDL in 2024. In the absence of supporting evidence, the Commission did not accept the subject's calculation regarding the partial reimbursement of these expenses by his sister.

116. As regards the expenses allegedly related to the death of the wedding godparent, the subject didn't identify the specific expense entries in the bank statements that were incurred for that purpose. Even assuming that such expenses were incurred, the subject did not provide evidence that they were subsequently reimbursed. Therefore, the Commission does not accept their deduction from the subject's retail expenses.

B.8. Yearly assessment of inexplicable wealth

B.8.1 Inexplicable wealth in 2013

Incoming financial flows

117. According to SFS information for 2013, the subject received a net income of 26,566 MDL as salary from UESM. His wife received a total net income of 26,415 MDL (10,621 MDL+9,293 MDL+6,276 MDL+225 MDL) as salary from activity in the field of education.

118. In accordance with the reasoning set out in §§ 62-67 above the calculations included 1,000 EUR equivalent to 16,724 MDL (according to the NBM average exchange rate for 2013) as a donation from the subject's sister L.B.

119. In the first round of questions (question 5), the subject reported no cash savings at the end of 2012. Given that the Commission did not identify any bank savings at the end of the year 2012, the Commission did not attribute any bank savings as being carried over into the beginning of the evaluation period. The same treatment was applied to the end-of-year cash balance.[11]

120. As noted in §§ 68-78 above, a statistical income of 34,080 MDL possibly earned in Italy by the subject's wife was attributed to the subject's household.

121. The total incoming financial flow in 2013 was 103,785 MDL.

Outgoing financial flows

122. In 2013, the subject acquired a Nissan Almera vehicle, m/y 2003. In the first round of questions (question 32), he stated that this vehicle was purchased for 2,850 EUR, which, according to the NBM's average exchange rate for 2013, amounted to 47,664 MDL.

123. In the third round of questions (question 2), the subject declared the construction expenses for Durlești house ranging between 4,000 and 8,000 EUR. For the consideration indicated in §§ 79-82 above, the Commission attributed the minimum amount declared by the subject, namely 4,000 EUR (equivalent to 66,896 MDL based on the average NBM exchange rate for 2013 of 16.7241 MDL).

124. According to calculations using the NBS methodology, the CEP of the subject's household in 2013 was 86,563 MDL.[12] For the reasons detailed in §§ 101-106 above, the Commission did not accept the subject's request to reduce the CEP.

125. In the first round of questions (question 5), the subject reported no cash savings at the end of 2013, and the Commission did not identify any bank savings at the end of that year. Therefore, the Commission did not attribute any outgoing financial flows as cash or bank savings in 2013.

126. The total outgoing financial flow in 2013 was 201,123 MDL. Nevertheless, the real amount of expenses incurred during this year may have been higher if the Commission had attributed the associated construction costs for Durlești

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[11] As stated by the ECtHR, savings (both cash and bank) have a double nature: at the start of the year, they count as incoming cash flow; at the end of the year, they count as outgoing cash flow. The outgoing cash flow of savings at the end of the previous period (2012) equals with the incoming cash flow of savings at the start of the following period (2013).

[12] (CEP 2013) 86,563 MDL = 1,803.4 x 4 persons x 12 months

house in the medium or maximum ranges as claimed by the subject (i.e. 6,000 EUR or 8,000 EUR).

127. It follows that, in 2013, financial outflows exceeded inflows by 97,338 MDL.

Table 1. Incoming and outgoing financial flows in 2013

<table>
<tr><th colspan="2">Income, MDL</th><th colspan="2">Expenses, MDL</th></tr>
<tr><td>Subject's salary (UESM)</td><td>+26,566</td><td>Consumption expenditures for population (CEP)</td><td>-86,563</td></tr>
<tr><td>Donation from sister L.B.</td><td>+16,724 (1,000 EUR)</td><td>Vehicle purchase (Nissan Almera, m/y 2003)</td><td>-47,664 (2,850 EUR)</td></tr>
<tr><td>Wife's salary (Department of Education, Youth, and Sports)</td><td>+10,621</td><td rowspan="5">House construction</td><td rowspan="5">-66,896 (4,000 EUR)</td></tr>
<tr><td>Wife's salary (1st lyceum)</td><td>+9,293</td></tr>
<tr><td>Wife's salary (2nd lyceum)</td><td>+6,276</td></tr>
<tr><td>Wife's salary (university)</td><td>+225</td></tr>
<tr><td>Income from unofficial work in Italy (statistical)</td><td>+34,080</td></tr>
<tr><td>Total, MDL</td><td>+103,785</td><td></td><td>-201,123</td></tr>
<tr><td>Difference, MDL</td><td colspan="3">-97,338</td></tr>
</table>

B.8.2. Inexplicable wealth in 2014

Incoming financial flows

128. According to SFS information for 2014, the subject received a net income of 31,392 MDL as salary from UESM. His wife received a total net income of 33,284 MDL (32,539 MDL+473 MDL+272 MDL) as salary from activities in the field of education and others.

129. In accordance with the reasoning set out in §§ 62-67, the calculations included 1,000 EUR equivalent to 18,632 MDL (according to the NBM average exchange rate for 2014) as a donation from the subject's sister L.B.

130. Given that the subject did not report any cash savings at the end of 2013, and that the Commission did not identify any bank savings at the end of that year, the Commission did not attribute any cash or bank savings to being carried over into the beginning of 2014.

131. As noted in §§ 68-78 above, a statistical income of 37,974 MDL possibly earned in Italy by the subject's wife was attributed to the subject's household.

132. The total incoming financial flow in 2014 was 121,282 MDL.

Outgoing financial flows

133. In the first round of questions (question 32 lit. c), the subject indicated that, in 2014, he incurred expenses of 3,000 MDL for the engine repair of the Nissan Almera vehicle m/y 2003.

134. Pursuant to § 123 above, the associated construction expenses for the Durlești house represented 4,000 EUR (equivalent to 74,528 MDL based on the average NBM exchange rate for 2014 of 18.6321 MDL).

135. According to the NBS, the CEP for a household with two adults and two children was 79,781 MDL in 2014.[13] For the reasons detailed in §§ 101-106 above, the Commission did not accept the subject's request to reduce the CEP.

136. In the first round of questions (question 5), the subject reported no cash savings at the end of 2014, and the Commission did not identify any bank savings at the end of that year. Therefore, the Commission did not attribute any outgoing financial flow as cash or bank savings in 2014.

137. The total outgoing financial flow in 2014 was -157,309 MDL.

138. It follows that, in 2014, financial outflows exceeded inflows by 36,027 MDL.

Table 2. Incoming and outgoing financial flows in 2014

<table>
<tr><th colspan="2">Income, MDL</th><th colspan="2">Expenses, MDL</th></tr>
<tr><td>Cash savings and bank savings at the beginning of the year</td><td>0</td><td>Vehicle repair – engine (Nissan Almera m/y 2003)</td><td>-3,000</td></tr>
<tr><td>Subject's salary (UESM)</td><td>+31,392</td><td rowspan="4">House construction</td><td rowspan="4">-74,528 (4,000 EUR)</td></tr>
<tr><td>Wife's salary (lyceum)</td><td>+32,539</td></tr>
<tr><td>Donation from sister L.B.</td><td>+18,632 (1,000 EUR)</td></tr>
<tr><td>Wife's salary (Municipal Electoral Council)</td><td>+473</td></tr>
<tr><td rowspan="2">Wife's salary (university)</td><td rowspan="2">+272</td><td>CEP</td><td>-79,781</td></tr>
<tr><td>Cash and bank savings at the end of the year</td><td>0</td></tr>
</table>

[13] (CEP 2014) 79,781 MDL = 1,662.1 MDL x 4 persons x 12 months

Income from unofficial work in Italy (statistical)	+37,974		
Total, MDL	**+121,282**		**-157,309**
Difference, MDL	**-36,027**		

B.8.3. Inexplicable wealth in 2015

Incoming financial flows

139. According to SFS information for 2015, the subject received a net income of 42,037 MDL as salary from UESM. His wife received a total net income of 46,636 MDL (44,680 MDL+1,348 MDL+608 MDL) as salary from activities in the field of education and others.

140. In accordance with the reasoning set out in §§ 62-67, the calculations included 1,000 EUR equivalent to 20,898 MDL (according to the NBM average exchange rate for 2015) as a donation from the subject's sister L.B.

141. Given that the subject reported no cash-savings at the end of 2014 and that the Commission did not identify any bank savings at the end of that year, the Commission did not attribute any cash or bank savings to being carried over into the beginning of 2015.

142. As noted in §§ 68-78 above, a statistical income of 42,590 MDL possibly earned in Italy by the subject's wife was attributed to the subject's household.

143. The total incoming financial flow in 2015 was 152,161 MDL.

Outgoing financial flows

144. According to the sale-purchase contract dated 20 August 2015, the subject purchased from G.B. two plots of land in Donici commune (Orhei) for a total price of 3,600 MDL. In the first round of questions (question 10), the subject indicated that these plots were a donation from his mother. His statements do not corroborate with the contractual provisions. The contract clearly indicates that the seller was G.B. and the buyer was the subject. As noted in § 58 above, in the absence of evidence, other than his own statements, supporting the subject's account, the Commission attributed the corresponding purchase costs to the subject's household.

145. Pursuant to § 123 above, the associated construction expenses for the Durlești house represented 4,000 EUR (equivalent to 83,592 MDL based on the average NBM exchange rate for 2015 of 20.898 MDL).

146. According to the NBS, the CEP for a household with two adults and two children amounted to 105,941 MDL in 2015.[14] For the reasons detailed in §§ 101-106 above, the Commission did not accept the subject's request to reduce the CEP.

147. In the first round of questions (question 5), the subject reported no cash savings at the end of 2015. The Commission identified bank savings at the end of the year totaling 16 MDL in his wife's Moldinconbank account No. 2259****8981. Pursuant to the annex of the Rules, this sum was treated as an outgoing financial flow for 2015 because it is carried over as an incoming financial flow for the following year.

148. The total outgoing financial flow in 2015 was -193,149 MDL.

149. It follows that, in 2015, financial outflows exceeded inflows by -40,988 MDL.

Table 3. Incoming and outgoing financial flows in 2015

<table>
<tr><th colspan="2">Income, MDL</th><th colspan="2">Expenses, MDL</th></tr>
<tr><td>Cash savings and bank savings at the beginning of the year</td><td>0</td><td rowspan="2">Lands purchase</td><td rowspan="2">-3,600</td></tr>
<tr><td>Subject's salary (UESM)</td><td>+42,037</td></tr>
<tr><td>Donation from sister L.B.</td><td>+20,898 (1,000 EUR)</td><td rowspan="4">House construction</td><td rowspan="4">-83,592 (4,000 EUR)</td></tr>
<tr><td>Wife's salary (lyceum)</td><td>+44,680</td></tr>
<tr><td>Wife's salary (Municipal Electoral Council)</td><td>+1,348</td></tr>
<tr><td rowspan="3">Wife's salary (university)</td><td rowspan="3">+608</td></tr>
<tr><td>CEP</td><td>-105,941</td></tr>
<tr><td rowspan="2">Cash and bank savings at the end of the year</td><td rowspan="2">-16</td></tr>
<tr><td>Income from unofficial work in Italy (statistical)</td><td>+42,590</td></tr>
<tr><td>Total, MDL</td><td>+152,161</td><td></td><td>-193,149</td></tr>
<tr><td>Difference, MDL</td><td colspan="3">-40,988</td></tr>
</table>

B.8.4. Inexplicable wealth in 2016

[14] (CEP 2015) 105,941 MDL = 2,207.1 MDL x 4 persons x 12 months

Incoming financial flows

150. According to SFS information for 2016, the subject received a net income of 38,865 MDL as salary from UESM. His wife received a total net income of 55,110 MDL (51,077 MDL+1,228 MDL+436 MDL+1,947 MDL+422 MDL) in as salary from activities in the field of education and others.

151. In accordance with the reasoning set out in §§ 61-66, the calculations included 1,000 EUR equivalent to 22,055 MDL (according to the NBM average exchange rate for 2016) as a donation from the subject's sister L.B.

152. Given that the subject reported no cash savings at the end of 2015, the Commission did not attribute any cash savings to being carried over into the beginning of 2016. At the beginning of 2016, the subject's household held bank savings of 16 MDL, which were treated as incoming flows.

153. As noted in §§ 68-78 above, a statistical income of 44,948 MDL possibly earned in Italy by the subject's wife was attributed to the subject's household.

154. The total incoming financial flow in 2016 was 160,994 MDL.

Outgoing financial flows

155. According to the sale-purchase of 12 December 2016, the subject purchased two plots of land from S.B. for a total price of 2,500 MDL (1,250 MDL each) in Donici commune (Orhei). In the first round of questions (question 27), the subject stated that the plots of land purchased by him from G.B. and S.B. were at his mother's initiative and she incurred the purchase expenses. The notarized sale-purchase contract clearly identifies the subject as the buyer. As noted in § 58 above, in the absence of evidence, other than his own statements, supporting the subject's account, the Commission attributed the corresponding purchase costs to the subject's household.

156. Pursuant to § 123 above, the associated construction expenses for the Durlești house represented 4,000 EUR (equivalent to 88,219 MDL based on the average NBM exchange rate for 2016 of 22.0548 MDL).

157. According to NBS, the CEP for a household with two adults and two children was 102,139 MDL in 2016.[15]

158. In the first round of questions (question 5), the subject declared no cash savings at the end of 2016. The Commission identified bank savings at the

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[15] (CEP 2016) 102,139 MDL = 2,127.9 MDL x 4 persons x 12 months

end of the year totaling 6,159 MDL in his wife's Moldinconbank account No. 2259****8981. Pursuant to the annex of the Rules, this sum was treated as an outgoing financial flow for 2016 because it is carried over as an incoming financial flow for the following year.

159. In the first round of questions (question 13), the subject stated that in 2016 he granted a loan of 3,000 EUR to his brother-in-law V.V., equivalent to 66,164 MDL (at the NBM average exchange rate for 2016 of 22.0548 MDL). He explained that the loan was granted under a verbal agreement, using funds belonging to his sister L.B. (who resides in Greece) that had been entrusted to him. According to the subject, the loan was intended for the purchase of a house. He further stated that the loan was repaid in 2017. He did not submit evidence relating to the loan agreement, the transfer of funds, or the origin of the funds. The subject reiterated the same explanations in the third round of questions (question 4 lit. a) and during the hearing.

160. Although included in its preliminary calculations, the Commission did not attribute this loan to the subject's outflows and inflows. Given that the subject did not declare cash savings in 2016, it is possible that the funds originated from the sister, as the subject claims.

161. The total outgoing financial flow in 2016 was -199,017 MDL.

162. It follows that, in 2016, financial outflows exceeded inflows by 38,023 MDL.

Table 4. Incoming and outgoing financial flows in 2016

<table>
<tr><th colspan="2">Income, MDL</th><th colspan="2">Expenses, MDL</th></tr>
<tr><td>Cash savings and bank savings at the beginning of the year</td><td>+16</td><td></td><td></td></tr>
<tr><td>Subject's salary (UESM)</td><td>+38,865</td><td>Lands purchase</td><td>-2,500</td></tr>
<tr><td>Donation from sister L.B.</td><td>+22,055 (1,000 EUR)</td><td rowspan="6">House construction</td><td rowspan="6">-88,219 (4,000 EUR)</td></tr>
<tr><td>Wife's salary (lyceum)</td><td>+51,077</td></tr>
<tr><td>Wife's salary (Municipal Electoral Council)</td><td>+1,228</td></tr>
<tr><td>Wife's salary (Department of Education, Youth, and Sports)</td><td>+1,947</td></tr>
<tr><td>Wife's salary (General Department of Education, Youth, and Sports)</td><td>+422</td></tr>
<tr><td>Wife's salary (university)</td><td></td></tr>
</table>

	+436	Cash and bank savings at the end of the year	-6,159
Income from unofficial work in Italy (statistical)	+44,948		
Total, MDL	**+160,994**		**-199,017**
Difference, MDL	**-38,023**		

B.8.5. Inexplicable wealth in 2018

Incoming financial flows

163. According to SFS information for 2018, the subject received a net income of 53,519 MDL as salary from USEM. His wife received a total net income of 72,645 MDL (63,726 MDL+6,549 MDL+1,423 MDL+397 MDL+550 MDL) as salary from activities in the field of education and others.

164. Given that the subject reported no cash savings at the end of 2017, the Commission did not attribute any cash savings to being carried over into the beginning of 2018. At the beginning of 2018, the subject's household held bank savings of 38 MDL registered on his wife's Moldinconbank account No. 2259****8981, which were treated as incoming flows.

165. In accordance with the reasoning set out in §§ 61-66, the calculations included 1,000 EUR equivalent to 19,844 MDL (according to the NBM average exchange rate for 2018) as a donation from the subject's sister L.B.

166. In the first round of questions (question 10) and in the second round of questions (question 7), the subject declared the donation of 1,000 EUR equivalent to 19,844 MDL (NBM average exchange rate for 2018 of 19.8442 MDL) and a loan of 1,000 EUR (reimbursed in 2019) of 19,844 MDL (NBM average exchange rate for 2018 of 19.8442 MDL) from his mother. According to his explanations, the origin of these funds was the financial support his mother received from his sisters, L.B. (who resides in Greece) and S.I. (who resides in Spain). Thus, based on the reasons described in §§ 62-67 above, the amount of 39,688 MDL (2,000 EUR) was included in the household incoming financial flows in 2018.

167. In 2018, the subject received a compensation of 36,024 MDL from the insurance company "National Bureau of Motor Insurers".

168. As noted in §§ 68-78 above, a statistical income of 40,442 MDL possibly earned in Italy by the subject's wife was attributed to the subject's household.

169. The total incoming financial flow in 2018 was 262,200 MDL.

Outgoing financial flows

170. According to the subject's answers provided in the first round of questions (question 32 and Annex 32.2), in 2018 he purchased the vehicle model Toyota Corolla m/y 2005 for 5,000 EUR equivalent to approximately 100,000 MDL.

171. Pursuant to § 121 above, the associated construction expenses for the Durlesti house represented 4,000 EUR (equivalent to 79,377 MDL based on the average NBM exchange rate for 2018 of 19.8442 MDL).

172. In the first round of questions (question 24) and in the second round of questions (question 11), the subject stated that his household incurred vacation expenses of 20,000 MDL (Greece). The CEP variable for „recreation" amounts in 2018 to 4,042 MDL.[16] To avoid duplication of declared vacation expenses, the Commission excluded the value of this variable from the calculation. Thus, the vacation expenses for this year included only what exceeded CEP and were 15,958 MDL.

173. Based on the cadastral information and the subject's reply in the third round of questions (question 9), the subject purchased on 19 September 2018 an agricultural land of 0.3848 ha located in Chiperceni Village (Orhei) for 6,775 MDL.

174. According to NBS, the CEP for a household with two adults and two children amounted to 121,469 MDL in 2018.[17]

175. In the first round of questions (question 6), the subject declared no cash savings at the end of 2018. The Commission identified bank savings at the end of the year totaling 39,377 MDL (35,761 MDL on subject's Moldinconbank account No. 2259****8001, 51 MDL on the subject's Victoriabank account No. 2259****4584, 3,564 MDL on his wife's Moldinconbank account No. 2259****1388 and 1 MDL on his wife's Moldinconbank account No. 2259****8981). Pursuant to the annex of the Rules, this sum was treated as an outgoing financial flow in 2018 because it is carried over as an incoming financial flow for the following year.

176. The total outgoing financial flow in 2018 was -362,956 MDL.

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[16] 4,042 MDL = 84.2 MDL per month × 12 months × 4 people

[17] (CEP 2018) 121,469 MDL=2,530.6 MDL x 4 persons x 12 months

177. It follows that, in 2018, financial outflows exceeded inflows by -100,756 MDL.

Table 5. Incoming and outgoing financial flows in 2018

Income, MDL		Expenses, MDL	
Cash savings and bank savings at the beginning of the year	+38	Vehicle purchase (Toyota Corolla, m/y 2005)	-100,000 (5,000 EUR)
Subject's salary (UESM)	+53,519	Vacation expenses in Greece (exceeding CEP)	-15,958
Donation from sister L.B.	+19,844 (1,000 EUR)	Land purchase	-6,775
Donation from mother	+19,844 (1,000 EUR)	House construction	-79,377 (4,000 EUR)
Loan from mother	+19,844 (1,000 EUR)		
Insurance compensation	+36,024		
Wife's salary (lyceum)	+63,726		
Wife' s salary (Municipal Electoral Council)	+1,423		
Wife's salary (Department of Education, Youth, and Sports)	+6,549		
Wife's salary (General Department of Education, Youth, and Sports)	+550		
Wife's salary (university)	+397	CEP	-121,469
Income from unofficial work in Italy (statistical)	+40,442	Cash and bank savings at the end of the year	-39,377
Total, MDL	**+262,200**		**-362,956**
Difference, MDL	**-100,756**		

B.2.6. Inexplicable wealth in 2020

Incoming financial flows

178. According to SFS information for 2020, the subject received a net income of 56,850 MDL as salary from USEM. He also received an income of 3,369 MDL from land rental ("F.G." LLC) and an income of 1,555 MDL as sickness allowance (CNAS). His wife received a total net income of 130,611 MDL (129,122 MDL + 1,205 MDL+ 284 MDL) as salary from activities in the field of education and a sickness allowance from CNAS of 3,049 MDL.

179. In the first round of questions (question 6), the subject indicated that at the end of 2019, he held cash savings of 1,000 EUR (est.19,674 MDL). The Commission also identified that the subject's household had bank savings totaling 4,175 MDL. These were identified on subject's Victoriabank account No. 2259****4584 (305 MDL), Moldinconbank account No. 2259****8001 (505 MDL), his wife's Moldinconbank account No. 2259****8981 (3,362 MDL) and MAIB bank account No. 2259****1388 (3 MDL). Pursuant to the annex of the Rules, these sums were considered incoming flows for 2020, as savings from the previous year.

180. The total incoming financial flow in 2020 was 219,283 MDL.

Outgoing financial flows

181. According to the contract of 17 June 2020, the subject purchased from A.C. a plot of land and a house in Camencea village (Orhei) for a total price of 34,000 MDL. Throughout the rounds of questions (round 1, question 27, and round 3, question 5), he claimed that the plot of land and the house were purchased by his mother and that he did not pay the price. This claim does not corroborate with the contract, which indicates the subject as the buyer. According to section III, point 3.1 "the price of the sold property, as mutually agreed upon and declared under the parties' own responsibility, amounts to 34,000 MDL, which was paid by the buyer to the seller on the date the contract was signed and notarized". As noted in § 58 above, in the absence of evidence, other than his own statements, supporting the subject's account, the Commission attributed the corresponding purchase costs to the subject's household.

182. Based on the cadastral information, on 17 June 2020, the subject purchased three plots of land for a total contractual price of 8,700 MDL, namely 5,700 MDL, 900 MDL, and 2,100 MDL in Donici commune (Orhei,).

183. According to the NBS, the CEP for a household with two adults and two children was 148,325 MDL in 2020.[18]

184. In the first round of questions (question 6), the subject declared holding cash savings at the end of 2020 in the amount of 2,500 EUR (est. 49,359 MDL). The Commission also identified bank savings at the end of the year totaling 6,550 MDL. These were identified on the subject's Victoriabank account No. 2259****4584 (277 MDL); on the subject's Moldinconbank account No. 2259****8001 (9 MDL); on his wife's Moldinconbank account No. 2259****8981 (1,041 MDL); on his wife's MAIB account No. 2259****1388 (3,087 MDL); on his son's Moldinconbank account No. 2259****6904 (2,136 MDL). Pursuant to the annex to the Rules, these sums were treated as outgoing financial flows in 2020 because they are carried over as incoming financial flows for the following year.

185. The total outgoing financial flow in 2020 was -246,934 MDL.

186. It follows that, in 2020, outflows exceeded inflows by 27,651 MDL.

Table 6. Incoming and outgoing financial flows in 2020

Income, MDL		**Expenses, MDL**	
Cash savings and bank savings at the beginning of the year	+23,849	Lands and house purchase	-34,000
Subject's salary (UESM)	+56,850		
Land rent ("F.G." LLC)	+3,369		
Sickness allowance (CNAS)	+1,555	Farmland purchase	-5,700
Wife's salary (lyceum)	+129,122	Land purchase	-900
Wife's salary (General Department of Education, Youth and Sports)	+1,205	Land purchase	-2,100

[18] (CEP 2020) 48,325 MDL = 3,090.1 MDL x 4 persons x 12 months

Wife's salary (National Agency for Quality Assessment in Education and Research)	+284	CEP	-148,325
Sickness allowance (CNAS)	+3,049	Cash and bank savings at the end of the year	-55,909
Total, MDL	**+219,283**		**-246,934**
Difference, MDL	**-27,651**		

B.2.7. Inexplicable wealth in 2022

Incoming financial flows

187. According to SFS information for 2022, the subject received a net income of 119,427 MDL as salary from USEM. He also received an income of 3,369 MDL from land rental ("F.G." LLC), 1,100 MDL as a sickness allowance (CNAS), and 30 MDL in interest from the Victoriabank account. His wife received a total net income of 164,533 MDL (163,530 MDL + 436 MDL+ 336 MDL+231 MDL) as salary from activities in the field of education and 73 MDL interest from her Moldinconbank account.

188. In the first round of questions (question 6), the subject indicated that at the end of 2021, he held cash savings of 4,000 EUR (est.83,702 MDL). The Commission also identified that the subject household had bank savings totaling 15,726 MDL. These were identified on subject's Victoriabank account No. 2259****4584 (570 MDL), Moldinconbank account No. 2259****8001 (182 MDL) and his wife's Moldinconbank account No. 2259****8981 (13,301 MDL), MAIB bank account No. 2259****1388 (740 MDL) and Moldinconbank account No. 2259****6904 (933 MDL). Pursuant to the annex of the Rules, these sums were considered incoming flows in 2022, as savings from the previous year.

189. In the first round of questions (questions 10, 17, 22) and the third round of questions (question 6), the subject declared receiving financial support from a friend named K.K. in the amount of 300 EUR equivalent to approximately 6,067 MDL and from relatives and friends in the amount of approximately 15,000 MDL related to his mother's death in 2022.

190. The total incoming financial flow in 2022 was 409,027 MDL.

Outgoing financial flows

191. The CEP for 2022 was 147,823 MDL. The Commission found retail expenses of -165,865 MDL and utilities expenses of -40,267 MDL on the subject's and his wife's bank accounts.

192. In the second round of questions (question 10), the subject indicated that the amount of 99,855 MDL withdrawn from his and his wife's bank accounts was spent on living expenses and house construction.

193. For the reasons indicated at § 107 above, the Commission did not apply the CEP estimates and included in its calculation the expenses identified on bank accounts. The distribution of the bank account retail expenses was the following:

- 85,102.84 MDL on Victoriabank account No. 2259****4584.
- 2,069.83 MDL on his wife's MAIB account No. 2259****1388.
- 70,477.56 MDL on his wife's Moldinconbank account No. 2259****8981.
- 8,215.07 MDL on his son's (D.-P.B.) Moldinconbank account No. 2259****6904. (according to subject's answer in the first round of questions (question 30) his son started his studies in Romania in September 2022).

194. Separately from retail, on his wife's Moldinconbank account No. 2259****8981, utilities expenses totaling 40,266.93 MDL were registered.

195. In his five-year declaration submitted to the Commission, the subject indicated expenses of 40,000 MDL for house improvement (furniture). For the considerations detailed in §§ 108-112 above, these expenses are reduced to 36,687 MDL.

196. Based on his response to the first round of questions (question 11), in 2022 he reimbursed the loan (contract of 20 December 2021) of 16,499 MDL, which was contracted to purchase a laptop.

197. In the first round of questions (question 10), in 2022, at a christening event, the household spent 300 EUR, equivalent to 5,969 MDL (according to the NBM average exchange rate for 2022).

198. In the first round of questions (question 24), he indicated travel expenses of 10,000 MDL to visit their son in Romania. For the considerations detailed in § 114 above, these expenses are reduced to 8,308 MDL.

199. Based on the cadastral information, on 13 September 2022, the subject purchased agricultural land for a contractual price of 15,000 MDL in

Chiperceni (Orhe). In the first round of questions (question 10), the subject indicated that this plot of land was a simulated donation from his brother-in-law, V.V. However, the contract clearly identifies V.V. as the seller and the subject as the buyer. As noted in § 58 above, in the absence of evidence, other than his own statements, supporting the subject's account, the Commission attributed the corresponding purchase costs to the subject's household.

200. Other expenses incurred by the subject's household in 2022 included a land purchase of 2,000 MDL, per the contract dated 3 January 2022 in Camencea (Orhei).

201. In the first round of questions (question 3) and the second round of questions (question 3), the subject declared study expenses in Romania for their son D.-P.B. in the amount of 42,700 MDL. For the reasons detailed in §§ 113 above, the Commission did not accept the subject's request to reduce these expenses.

202. In the first round of questions (question 6), the subject declared holding cash savings at the end of 2022 in the amount of 5,000 EUR equivalent to 99,491 MDL (according to the NBM average exchange rate for 2022 – 19,8982 MDL). Also, at the end of the year, the subject's household had bank savings totaling 8,293 MDL. These were identified on Victoriabank account No. 2259****4584 (356 MDL); on the subject's Moldinconbank account No. 2259****8001 (147 MDL); on his wife's Moldinconbank account No. 2259****8981 (6,538 MDL); on his wife's MAIB account No. 2259****1388 (1,227 MDL); on his wife's Moldinconbank account No. 2259****6904 (25 MDL). Pursuant to the annex to the Rules, these sums were treated as outgoing financial flows in 2022 because they are carried over as incoming financial flows for the following year.

203. The total outgoing financial flow in 2022 was -441,079 MDL.

204. It follows that, in 2022, outflows exceeded inflows by -32,052 MDL.

Table 7. Incoming and outgoing financial flows in 2022

Income, MDL		Expenses, MDL	
Cash savings and bank savings at the beginning of the year	+99,428	House improvement	-36,687

Subject's salary (UESM)	+119,427	Lands purchases	-17,000
Land rent ("F.G." LLC)	+3,369		
Sickness allowance (CNAS)	+1,100	School expenses in Romania for son D.-P.B.	-42,700
Interest Victoriabank account	+30	Loan reimbursement (contract of 20.12.2021)	-16,499
Financial support from relatives and friends (related to subject's mother's death)	+21,067 (6,067 and 15,000)		
Interest wife's Moldinconbank account	+73	Christening event	-5,969 (300 EUR)
Wife's salary (lyceum)	+163,530		
Wife's salary (National Agency for Quality Assessment in Education and Research)	+336		
Wife's salary (General Department of Education, Youth, and Sports)	+436		
Wife's salary (university)	+231	Travel to Romania	-8,308
		Retail and utilities expenses	-206,132
		Cash and bank savings at the end of the year	-107,784
Total, MDL	**+409,027**		**-441,079**
Difference, MDL	**-32,052**		

B.2.8. Inexplicable wealth in 2024

Incoming financial flows

205. According to SFS information for 2024, the subject received a net income of 161,384 MDL as salary from USEM. He also received an income of 3,369 MDL from land rental ("F.G." LLC), and 57 MDL as interest from the Victoriabank account. His wife received a total net income of 233,545 MDL (226,618 MDL + 6,406 MDL+ 521 MDL) as salary from activities in the field of education and 253 MDL interest from her Moldinconbank account.

206. In the first round of questions (question 6), the subject indicated that at the end of 2023, he held cash savings of 500 EUR (est.9,822 MDL). The Commission also identified that the subject's household had bank savings totaling 16,778 MDL. These were identified on subject's Victoriabank account No. 2259****4584 (842 MDL), on Moldinconbank account No. 2259****8001 (147 MDL), on his wife's Moldinconbank account No. 2259****8981 (11,359 MDL), on his wife's Moldinconbank account No. 2259****2881 (4,186 MDL), on his wife's Moldinconbank account No. 2259****6904 (25 MDL) and on his son's (R.-R.B.) Moldinconbank account No. 2259****8102(195 MDL). Pursuant to the annex of the Rules, these sums were considered incoming flows in 2024, as savings from the previous year.

207. The total incoming financial flow in 2024 was 425,208 MDL.

Outgoing financial flows

208. The CEP for 2024 was 191,952 MDL. The Commission found retail expenses of -301,378 MDL and utilities expenses of -49,678 MDL on his and his wife's bank accounts.

209. In the second round of questions (question 10), the subject indicated that the amount of 67,100 MDL withdrawn from his and his wife's bank accounts was spent on living expenses and house construction.

210. For the reasons indicated at § 107 above, the Commission did not apply the CEP estimates and included in its calculation the expenses identified on bank accounts. The distribution of the bank account retail expenses was the following:

- 88,534.92 MDL on Victoriabank account No. 2259****4584;
- 173,796.42 MDL on his wife's Moldinconbank account No. 2259****8981;
- 39,046.88 MDL on his wife's Moldinconbank account No. 2259****2881.

211. Separately from retail, on his wife's Moldinconbank account No. 2259****8981 were registered utilities expenses in 2024 in the amount of 49,677.58 MDL.

212. In the five-year declaration submitted to the Commission, he indicated expenses of 38,000 MDL for home improvement (construction). For the considerations detailed in §§ 108-112 above, these expenses are reduced to 30,456 MDL.

213. Based on the subject's answers in the first round of questions (question 10), in 2024 his household spent 250 EUR equivalent to 4,813 MDL (according to the NBM average exchange rate for 2024) for a wedding gift.

214. In the first round of questions (question 3) and the second round of questions (question 3), the subject declared study expenses for their son D.-P.B. in the amount of 68,100 MDL. For the reasons detailed in §§ 113 above, the Commission did not accept the subject's request to reduce these expenses.

215. In the first round of questions (question 24), the subject indicated two vacation expenses in total amount of 40,000 MDL (each 20,000 MDL). In the third round of questions, the subject rectified his initial answers and claimed that his household incurred lower expenses:

    (i) 13,500 MDL – Romania, 14-18.08.2024.

    (ii) 15,500 MDL – Bulgaria, 21-25.06.2024.

216. For the considerations detailed in § 115 above, the vacation expenses in Romania are reduced to 6,799 MDL.

217. In the first round of questions (question 6), the subject declared holding cash savings at the end of 2024 in the amount of 2,000 EUR equivalent to 38,507 MDL (according to the NBM average exchange rate for 2024 of 19,2533 MDL). Also, at the end of the year, the subject's household had bank savings totaling 6,091 MDL. These were identified on Victoriabank account No. 2259****4584 (190 MDL), on Moldinconbank account No. 2259****8001 (147 MDL), on his wife's Moldinconbank account No. 2259****2881 (39 MDL), on his wife's Moldinconbank account No. 2259****8981 (4,870 MDL), on his wife's Moldinconbank account No. 2259****6904 (25 MDL) and on his son's, R.-R.B., Moldinconbank account No. 2259****8102 (820 MDL). Pursuant to the annex to the Rules, these sums were treated as outgoing financial flows for 2024 because they are carried over as incoming financial flows for the following year.

218. The total outgoing financial flow in 2024 was -521,329 MDL.

219. It follows that, in 2024, outflows exceeded inflows by -96,121 MDL.

Table 8. Incoming and outgoing financial flows in 2024

Income, MDL		**Expenses, MDL**	
Cash savings and bank savings at the beginning of the year	+26,600	House improvement	-30,456
Subject's salary (UESM)	+161,384	Wedding gift	-4,813 (250 EUR)
Land rent ("F.G." LLC)	+3,369	School expenses in Romania for son D.-P.B.	-68,100
Interest Victoriabank account	+57		
Interest wife's Moldinconbank account	+253	Two vacations (Romania and Bulgaria)	-22,299
Wife's salary (lyceum)	+226,618		
Wife's salary (National Agency for Quality Assessment in Education and Research)	+521	Retail and utilities expenses	-351,056
Wife's salary (General Department of Education, Youth, and Sports)	+6,406	Cash and bank savings at the end of the year	-44,605
Total, MDL	**+425,208**		**-521,329**
Difference, MDL	**-96,121**		

220. Thus, the subject's household incurred the following inexplicable wealth in the evaluation period:

Year	Incoming financial flows	Outgoing financial flows	Inexplicable wealth, MDL
2013	+103,785	-201,123	-97,338
2014	+121,282	-157,309	-36,027
2015	+152,161	-193,149	-40,988
2016	+160,994	-199,017	-38,023
2018	+262,200	-362,956	-100,756
2020	+219,283	-246,934	-27,651
2022	+409,027	-441,079	-32,052
2024	+425,208	-521,329	-96,121
Total			**- 468,956**

221. The Commission notes that the total negative balance accumulated by the subject's household was - 468,956 MDL. This exceeds the threshold of 322,000 MDL provided by Article 11 para. (3) lit. a) of Law No. 65/2023. The Commission, therefore, concludes that the subject does not meet the financial integrity criterion.

VI. Conclusion

222. Based on the information it obtained and that presented by the subject, the Commission proposes that the subject does not promote the external evaluation on the grounds of non-compliance with the criteria set in Article 11 para. (3) lit. a) of Law No. 65/2023.

VII. Further action and publication

223. As provided in Article 25 para. (3) of the Rules, this evaluation report will be sent by e-mail to the subject and the Superior Council of Magistracy. The Commission will publish the evaluation result on its official website on the same day.

224. No later than three days after the approval, a printed paper copy of the report, electronically signed by the Chairperson, will be submitted to the Superior Council of Magistracy, along with the original electronic copy of the evaluation file containing all the evaluation materials gathered by the Commission.

225. This report will be published on the Commission's official website, with appropriate precautions to protect the privacy of the subject and other persons, within three days after the expiry of the appeal period against the decision of the Superior Council of Magistracy or after the Supreme Court of

Justice issues its decision rejecting the appeal or ordering the promotion or non-promotion of the evaluation.

226. This evaluation report was approved by unanimous vote of the participating members on 16 June 2026 and signed pursuant to Article 8 para. (1) and (2) of Law No. 65/2023.

227. Done in English and Romanian.

Andrei Bivol

Chairperson