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# EVALUATION REPORT

approved according to Article 40

of the Rules of Organization and Functioning

# VERONICA CUPCEA

Interim President of Orhei first level Court

subject of evaluation under Article 3 para. (1) Law No. 252/2023

**18 December 2025**

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Evaluation Panel C of the Commission (hereinafter the "Commission") established by Law No. 65/2023 on the External Evaluation of Judges and Candidates for Judges of the Supreme Court of Justice and discharging the powers under Law No. 252/2023 on the external evaluation of judges and prosecutors and amending some normative acts (hereinafter "Law No. 252/2023") deliberated on the matter on 4 November 2025 and approved the following report on 18 December 2025. The members participating in the approval of the report were:

1. Andrei BIVOL
2. Willem BROUWER
3. Lavly PERLING

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 Mrs. Veronica Cupcea (hereinafter the "subject"), interim president of the Orhei Court.

2. The Commission conducted its evaluation pursuant to Law No. 252/2023 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. 252/2023 for financial integrity.

## II. Subject of the Evaluation

4. The subject has served as Interim President of the Orhei Court since 2021. She previously served as President of the Orhei Court from 2017 to 2021.

5. In 2007, the subject was appointed as a judge at the Orhei Court.

6. Between 2004-2007, the subject was a judicial assistant at the Supreme Court of Justice. Before that, the subject was a senior specialist at the Ministry of Justice.

7. The subject received a bachelor's degree in law in 2000 from the Moldova State University.

## III. Evaluation Criteria

8. Under Article 11 para. (1) of Law No. 252/2023, the Commission evaluates the subject's ethical and financial integrity.

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

> "[…] does not meet ethical integrity requirements if the Evaluation Commission has determined that:
>
> a) in the last 5 years, he/she seriously violated the rules of ethics and professional conduct of judges, or, as the case may be, prosecutors, 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 on Human Rights;
>
> b) in the last 10 years, has admitted in his/her work incompatibilities and conflicts of interest that affect the office held."

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 20 average salaries per economy, in the amount set by the Government for the year 2023;
>
> 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 2023."

11. The average salary per economy for 2023 was 11,700 MDL. Thus, the threshold of 20 average salaries is 234,000 MDL, and the threshold of five average salaries is 58,500 MDL.

12. Article 11 para. (4) of Law No. 252/2023 allows the Commission to verify various things in evaluating the subject's financial integrity, including payment of taxes, compliance with the legal regime for declaring assets and personal interests, and the origins of the subject's wealth.

13. In evaluating the subject's financial integrity, Article 11 para. (5) of Law No. 252/2023 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.

14. 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.

15. According to Article 11 para. (2) of Law No. 252/2023 a subject shall be deemed not to meet the ethical integrity criterion if the Commission has determined the existence of the situations provided for by that paragraph. Under Article 11 para. (3) of Law No. 252/2023, the Commission determines that a subject does not meet the financial integrity criterion 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.

16. Regarding the standard of "serious doubts" in the context of the vetting exercise, the Constitutional Court noted concerning 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).

17. 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 16 para. (1) of Law No. 252/2023. After weighing all the evidence and information gathered during the proceedings, the Commission makes its determination.

## IV. Evaluation Procedure

18. On 15 April 2025, the Commission received from the Superior Council of Magistracy, under Article 12 para. (1) of Law No. 252/2023, the list of judges

who have exercised the office of President and/or Vice-President of the Judges, including those who have interim these positions for a term of more than one year. The list included the subject as Interim President of the Orhei Court.

19. On 2 May 2025, the Commission notified the subject and requested that she complete and return an ethics questionnaire and the declarations as provided in Article 12 para. (3) of Law No. 252/2023 within 20 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 21 May 2025.

20. On 30 May 2025, the Commission notified the subject that her evaluation file had been randomly assigned to Panel A, with members Andrei Bivol, Willem Brouwer and Lavly Perling. She was also informed that subjects may request, in writing and at the earliest possible time, the recusal of members from their evaluation.

21. On 20 August 2025, the Commission notified the subject that the evaluation panel composed of members Andrei Bivol, Willem Brouwer and Lavly Perling has been renamed Panel C.

22. Because the law sets 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. 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.

23. In the last 12 years of the evaluation period, the subject had an obligation to submit declarations, both under Law No. 133/2016 on the Declaration of Wealth and Personal Interests and under Law No. 1264/2002 on the Declaration and Income and Property Control for persons with positions of Public Dignity, Judges, Prosecutors, Civil Servants, positions of Management. The subject's husband also had the obligation to submit declarations during the period 2013-2016.

24. The subject was also evaluated under Law No. 26/2022 on Measures related to the Selection of Candidates for the Positions of Members in the Self-

administration Bodies of Judges and Prosecutors. In that evaluation, the Pre-Vetting Commission gathered information from multiple sources.

25. The subject's husband also underwent an unfinished evaluation procedure under Law No. 26/2022, as a candidate for the Board for the Selection and Evaluation of Judges. His candidacy was withdrawn by the Superior Council of Magistracy, and the Commission did not issue a reasoned decision on the subject's husband passing or failing the evaluation.

26. In accordance with Article 14 para. (12) of Law No. 252/2023, the Commission used the information gathered during the previous evaluation procedures.

27. In the present evaluation under Law No. 252/2023, the Commission also sought and obtained information from numerous sources. No source advised the Commission of later developments or any corrections regarding the information provided.

28. 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 (EuroCreditBank JSC, Eximbank JSC, Moldinconbank JSC, MAIB JSC, Victoriabank JSC, Banca de Economii JSC, Unibank JSC), Office for Prevention and Fight Against Money Laundering (in Romanian: *Serviciul Prevenirea și Combaterea Spălării Banilor*, hence hereinafter – "SPCSB"), 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.

29. On 17 July 2025, the Commission asked the subject to provide additional information by 27 July 2025 to clarify certain matters (hereinafter the "first round of questions"). On 23 July 2025, the subject requested an extension of the deadline to respond, which the Commission granted until 4 August 2025. The subject provided answers and documents within the extended deadline.

30. On 26 August 2025, the Commission asked the subject to provide additional information by 7 September 2025 to clarify certain matters (hereinafter the

"second round of questions"). The subject provided answers and documents within the deadline.

31. On 24 October 2025, the Commission notified the subject that it had identified some areas of doubt about the subject's compliance with the financial criterion and invited her to attend a public hearing on 4 November 2025. The subject was also informed that the evaluation report may refer to other issues considered during the evaluation.

32. As provided in Article 39 para. (4) of the Rules, the subject sought and was provided access to all the materials in her evaluation file on 28 October 2025.

33. On 3 November 2025, the subject submitted additional information and documents. The Commission included them in the evaluation file and considered them in its analysis.

34. On 4 November 2025, the Commission held a public hearing. At the hearing, the subject reaffirmed the accuracy of her answers in the five-year declaration and the ethics questionnaire. She also stated that she did not have any corrections or additions to the answers previously provided to the Commission's requests for information.

35. After the hearing, on 5 November 2025, the subject submitted additional information and documents. The Commission included them in the evaluation file and considered them in its analysis.

## V. Analysis

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

37. The Commission acknowledges that another evaluation procedure was conducted by the Pre-Vetting Commission established under Law No. 26/2022. The Pre-Vetting Commission applied different criteria under Law No. 26/2022 and made its own evaluation decisions.

38. Based on the information it collected, the Commission analyzed and, where necessary, requested further clarifications regarding the difference between the assets, expenses, and income (hereinafter "unjustified or inexplicable wealth") for 2013, 2014, 2017, and 2020.

## A. Inexplicable wealth for 2013, 2014, 2017 and 2020

39. In analyzing the subject's financial situation, the Commission preliminarily identified a difference of 379,025 MDL between wealth, expenses, and income.

40. The Commission will first clarify specific issues that significantly impact the calculation of inexplicable wealth. After these issues are addressed, an annual assessment of the subject's household income and expenses will follow.

### A.1. Unavailability of cash savings at the beginning of the evaluation

41. During the questioning rounds and the public hearing, the subject's explanations of her negative balances mostly relied on the alleged availability of cash savings.

42. In the first round of questions (Question 1, a), the subject stated that her household had available cash savings of 94,000 MDL at the beginning of the evaluation period, noting that the amount provided is estimated. In explaining the source of funds, she stated generally that these were from "family revenues" and the "financial and material support of the parents".

43. In the second round of questions (Question 7, b), when asked to clarify the source of the cash savings given the preliminary negative balances for 2011 and 2012, the subject said that the savings have been accumulated since 1991. She noted that between 1991–2011 her household acquired no significant assets. To the preliminary negative balance for 2011 and 2012, she generally stated that there is no proven negative balance and remarked that a working family cannot start the year without cash savings: "we have been employed since 1991 (my husband) and 1992 (myself)".

44. To verify these circumstances, the Commission reviewed the household's financial situation for two years preceding the evaluation period (2011 and 2012). These calculations are reflected below but are not included in the assessment of the subject's unjustified wealth because her evaluation period included 2013-2024, as noted in § 22 above.

#### A.1.1. Financial situation in 2011

*Incoming financial flows*

45. According to SFS data, in 2011, the subject earned a salary of 68,160 MDL as a judge at the Orhei Court, and her husband earned a salary of 61,028 MDL as a judge at the Criuleni Court.

46. On 4 November 2011, the subject and her husband sold a 33,4 sq.m apartment on Ginta Latină street for the contractual price of 174,842 MDL.

47. The subject's husband declared in response to the fourth round of questions of his evaluation receiving a cash loan of 200,000 MDL from his sister, Z.C. Neither the subject, nor her husband, nor NIA provided the Commission with the 2011 declarations of the subject and her husband, which prevented it from verifying whether the loan had been declared. No other supporting documentation was provided to prove this loan.

48. The Commission was unable to verify the subject's sister-in-law's financial capacity to grant the loan, as she had not registered any income in the country in that period. In the same round of questions, the subject's husband stated that his sister had worked in the Russian Federation in the 1990s, then from 2003 had worked for approximately seven years in Israel, after which she has been working in Italy.

49. This loan was not declared in the subject's husband's NIC declaration for 2012, which suggests that it was repaid before the evaluation period began. As is described below, the subject argued that the loan was not repaid but extinguished in 2012 based on an arrangement between her husband and the subject's sister-in-law.

50. Although no reasons have been identified that would definitively indicate that the loan from Z.C. was not received, because both the giving of the loan and writing off (*stingerea*) occurred before the evaluation period, the Commission accepted it as an inflow of funds for 2011.

51. On 21 September 2011, the subject sold a Volkswagen Golf, m/y 2000, for a reported amount of 80,000 MDL. According to the subject, this amount was subsequently used, in part, to purchase a newer vehicle in the same year, a Volkswagen Polo, m/y 2004, for the sum of 60,000 MDL. The subject claimed that she sold this vehicle two years later for 83,200 MDL.

52. These higher sale price appears unplausible, but could not be corroborated due to the expiration of the contract retention period by the PSA. However, newer vehicles of similar type usually cost more than older ones because of their age, condition, and market demand. This difference suggests price

under- or over-statement. For calculation purposes, the Commission accepted the amounts claimed by the subject.

53. In the second round of questions, the subject claimed that in 2011, the household received a donation of 62,000 MDL from her father-in-law (alleged amount received as pension). In support of this, she provided documents confirming the receipt of pension and a power of attorney authorizing, among others, the subject's husband to receive it.

54. This amount was corroborated with the subject's mother-in-law's pension and the Consumption Expenditure for Population (hereinafter „CEP") for her parents-in-laws during the relevant period.

*Income of the parents-in-law and CEP for the period 2009-2011*

| Year | Father-in-law's pension | Mother in law's pension | CEP |
|---|---|---|---|
| 2009 | 29,272 MDL | 9,876 MDL | 27,216 MDL[1] |
| 2010 | 30,120 MDL | 10,404 MDL | 30,984 MDL[2] |
| 2011 | 31,792 MDL | 11,220 MDL | 35,000 MDL[3] |
| **Total** | **91,184 MDL** | **31,500 MDL** | **93,200 MDL** |
| **Difference** | **29,484 MDL** | | |

55. It follows that over a three-year period, the difference between the parents-in-law's cumulative pensions and the CEP amounts to only 29,484 MDL. This

[1] The CEP for any year between 2006-2018 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 – 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: *1,134 MDL x 12 months x 2 family members.*
[2] *1,291 MDL x 12 months x 2 family members.*
[3] *1,475 MDL x 12 months x 2 family members.*

indicates that the alleged donation of 62,000 MDL from the father-in-law in 2011 would not have been possible in full. The subject, however, insisted that she received 62,000 MDL, even though the source of these funds remains unclear.

56. In the explanations submitted prior to the hearing, the subject indicated that the parents-in-law's pensions were not their sole source of income, as they also owned agricultural land from which they harvested and sold agricultural products.

57. The Commission notes that, in examining the subject's appeal against the Pre-Vetting Commission Decision, the Supreme Court of Justice, in its Decision of 12 August 2025[4] (hereinafter „SCJ's Decision of 12 August 2025"), stated on this (§§ 401, 402):

> „The complainant submitted documents regarding possible additional income of the parents-in-law (the mother-in-law's salary as a teacher, income from the sale of agricultural products, ownership of a horse and cart, the exploitation of three plots of land with walnut orchards, and the sale in 2009 of a 0.045 ha vineyard plot).
>
> The Court noted that the certificates issued by the local authorities confirm the nature of these activities but do not indicate the amounts of income generated. Therefore, in the absence of financial-accounting evidence showing the actual sums obtained, these elements do not allow verification of the sufficiency of the sources for the claimed donations; consequently, the doubts noted by the Commission cannot be considered resolved."

58. Therefore, the Commission does not consider this source of income for the subject's household in 2011. As a result, the subject's household has a total verifiable incoming cash flow of 584,030 MDL.

*Outgoing financial flows*

59. The estimated CEP for the subject's family in 2011 was 88,368 MDL (1,841 MDL x 12 months x 4 family members), considering that the subject stated that both children were part of the household until August 2017.

60. On 15 November 2011, the subject purchased a Volkswagen Polo, m/y 2004, for the alleged amount of 60,000 MDL.

[4] https://jurisprudenta.csj.md/search_col_civil.php?id=79173

61. On 23 March 2012, the subject's husband concluded an investment agreement concerning the acquisition of a 92,4 sq.m apartment located in Chișinău, Branistii street. The insolvency administrator of the construction company stated, in the response referred to in § 115, that on 29 November 2011, the parties concluded a preliminary agreement regarding this apartment.

62. According to the information provided by SPCSB, it was on this earlier date (29 November 2011) that the subject's husband transferred 554,953 MDL as an installment payment in connection with this agreement. This payment was thus included for 2011.

63. Therefore, in 2011, the subject's household had a total outgoing cash flow of 703,321 MDL.

64. As a result, in 2011, the household's total outgoing financial flow exceeded its incoming flow by approximately 119,291 MDL.

*Incoming and Outgoing Financial Flows in 2011*

| **Income** | | **Expenses** | |
|---|---|---|---|
| Subject's salary | 68,160 MDL | CEP | 88,368 MDL |
| Husband's salary | 61,028 MDL | Installments for the apartment on Branistii street | 554,953 MDL |
| Sale of apartment on Ginta Latina street | 174,842 MDL | Purchase of Volkswagen Polo m/y 2004 | 60,000 MDL |
| Sale of Volkswagen Golf m/y 2000 | 80,000 MDL | - | - |
| Loan from sister-in-law | 200,000 MDL | - | - |
| **Total** | **584,030 MDL** | **Total** | **703,321 MDL** |

| | |
|---|---|
| **Difference** | **-119,291 MDL** |

65. Even if the Commission had accepted the full donation of 62,000 MDL from the subject's father-in-law, the difference between income and expenses would have been -57,291 MDL, still resulting in a negative balance for the year 2011.

**A.1.2. Financial situation in 2012**

*Incoming financial flows*

66. According to SFS data, in 2012, the subject earned a salary of 63,126 MDL as a judge at the Orhei Court, and her husband earned a salary of 59,095 MDL as a judge at the Criuleni Court.

67. On 23 October 2012, the subject contracted a loan in the amount of 270,000 MDL from BC MAIB S.A., for the acquisition of a plot of a land and an unfinished building, located in Criuleni District, described at § 75. The credit was due on 18 October 2030 with a floating interest rate initially set at 13% per year.

68. As noted above, the subject claims that her family had accumulated cash savings since 1991 and that at the end of 2012, they had cash savings amounting to 94,000 MDL.

69. When asked during the hearing why it was necessary to contract a loan if the household had cash savings, the subject stated that they had already spent the savings. It remains unclear why the subject would have taken out an interest-bearing loan from the bank on 23 October 2012 if she could have used the cash savings she claims to have had available at the end of 2012, that is, in December.

70. If the subject had spent all the alleged cash savings before taking out the loan, it seems implausible that she could have accumulated savings amounting to 94,000 MDL in the remaining two months of that year.

71. The subject also claimed that in 2012, her father-in-law allegedly donated 34,200 MDL to the household. In 2012, the father-in-law's pension amounted to 34,193 MDL, and the mother-in-law's to 12,300 MDL. The CEP in 2012 was 36,480 MDL (1,520 MDL × 12 months × 2 family members). Therefore, the difference between the in-laws' income and the CEP is only 10,013 MDL.

72. As in the case of the donation from the previous year, the above indicates that the alleged donation of 34,200 MDL from the father-in-law would not have been possible in full. The subject insisted that she received a donation exceeding the financial capacity of her parents-in-law, but the Commission did not accept this sum.

73. Therefore, for 2012, the subject's household had a total verifiable incoming cash flow of 392,221 MDL.

*Outgoing financial flows*

74. The estimated CEP for the subject's family in 2012 was 92,112 MDL (1,919 MDL x 12 months x 4 family members).

75. On 23 October 2012, the subject concluded a sale-purchase contract of a land plot under construction measuring 0.0799 ha, along with an unfinished building of 133.7 sq.m, located in Criuleni District. The contract set the price at 300,000 MDL, with 30,000 MDL payable before signing and the remaining 270,000 MDL due by 23 November 2012.

76. On 23 March 2012, the subject's husband transferred an installment of 16,409 MDL in connection with the investment agreement concluded on the same date, mentioned in § 61.

77. Also, the subject made a loan repayment of 7,293 MDL to BC MAIB S.A in connection with the 270,000 MDL loan contracted in 2012.

78. In the 2012 declaration submitted to NIC, the subject's husband did not declare the 200,000 MDL loan allegedly received in 2011 from his sister, Z.C., as required under art. 4 para. (1) lit. f) of Law No. 1264/2002. The Commission did not receive the subject's income and property declaration for 2012, which prevented it from corroborating whether she had also omitted to declare the loan. Nevertheless, based on the information in the subject's husband's declaration the Commission concluded that the loan was repaid in 2012.

79. In the second round of questions, the subject stated that in 2012, her husband and his sister reached a verbal agreement whereby the sister-in-law released him from the obligation to repay the debt in cash. In return, the husband agreed to transfer to her the ownership of two walnut orchard plots, which he expected to inherit, as both parents had named him as sole heir in their wills. The Commission was provided with the wills and could corroborate this information.

80. Following the death of their father in the summer of 2013 and the completion of inheritance formalities, the subject's husband fulfilled his obligation in 2016 by donating one-half of the plots to his sister.

81. Therefore, the subject claims the debt was settled in 2012 through a verbal agreement under which her husband would transfer inherited in the future land plots to his sister as a replacement for the obligation to repay the borrowed amount.

82. Under Article 665 para. (1) of the Civil Code (the version in force until 1 March 2018), an obligation is extinguished based on an agreement between the parties to replace it with another obligation. Furthermore, para. (2) of the same article provides that the intention to substitute one obligation with another must be expressly stipulated.

83. No evidence was presented to demonstrate that the intention to substitute the obligation to repay the debt with the obligation to transfer ownership of the land was expressly stipulated.

84. Moreover, according to the general rule set out in Article 212 of the Civil Code (the version in force until 1 March 2018), the authentic form of a legal act is mandatory when the act concerns the transfer of immovable property. Although the Commission acknowledges that agreements between relatives may not always comply with the formal requirements of the law, the lack of a written or notarized form for this particular agreement diminishes its plausibility.

85. The fact that the actual transfer of land occurred in 2016 further undermines the claim that the debt has been settled in 2012. Thus, the Commission considers the loan repaid in 2012, because the subject's husband ceased to declare it.

86. According to the bank data, the subject's household had 19,882 MDL in an account at the end of 2012, considered a financial outflow, according to the Rules of the Commission.

87. Thus, in 2012, the subject had a total outgoing cash flow of 635,704 MDL.

88. Consequently, in 2012, financial outflows appear to have exceeded inflows by 243,475 MDL.

*Incoming and outgoing financial flows for 2012*

| Income | | Expenses | |
|---|---|---|---|
| Subject's salary | 63,126 MDL | CEP | 92,112 MDL |
| Husband's salary | 59,095 MDL | Installments for the apartment on Branistii street | 16,409 MDL |
| Loan from MAIB | 270,000 MDL | Purchase of Pascani properties | 300,000 MDL |
| - | - | Loan repayment to MAIB | 7,293 MDL |
| - | - | Loan repayment to the sister-in-law | 200,000 MDL |
| - | - | Bank savings | 19,882 MDL |
| **Total** | **392,221 MDL** | **Total** | **635,696 MDL** |
| **Difference** | **-243,475 MDL** | | |

89. Even if the Commission were to accept that the 200,000 MDL loan from the sister-in-law was not repaid, the balance would still be negative.

90. Additionally, even if the Commission accepted the full donation from her parents-in-law (34,200 MDL) mentioned in § 71, the balance would still be negative (-209,275 MDL).

**A.1.3. Conclusion on the cash savings at the beginning of the evaluation**

91. The above circumstances make it unlikely that the subject had 94,000 MDL cash savings prior to the evaluation period.

92. In the first round of questions in the evaluation procedure under Law No. 26/2022, when asked about the source of funds used for the purchase of the apartment on Braniștii Street, the subject stated the following:

> „The source of the funds for purchasing the attic-type apartment consists of the amount of 174,842 MDL obtained from the sale of the apartment on Ginta Latină Street and **our family's savings accumulated over 20 years**, gathered not without the help of our parents."

93. Therefore, the subject acknowledged that the alleged savings were used for the purchase of this apartment, for which the first installment of 554,953 MDL was paid on 29 November 2011.

94. Less than a one year later, on 23 October 2012, the subject contracted a bank loan of 270,000 MDL from BC MAIB S.A. to acquire the Pascani, Criuleni District properties for 300,000 MDL.

95. The need to incur significant borrowing so shortly after a major payment indicates limited available liquid funds, which is inconsistent with the existence of sustained, unspent savings leading to a remaining balance of 94,000 MDL in 2021.

96. Consequently, for the purpose of calculating inexplicable wealth, the cash savings amounting to 94,000 MDL at the end of 2012 referenced by the subject are not included in the calculation.

**A.2. Cash savings during the evaluation period**

97. Law No. 1264/2002 did not require the declaration of cash savings. This requirement was introduced only with the enactment of Law No. 133/2016, which entered into force in August 2016. This disclosure requirement applied to cash savings held as of the date of the declaration submission form, and only to savings exceeding 15 average salaries for the economy.

98. In the first round of questions, the subject was asked to identify any cash savings available at the end of each year during the period 2013–2015. For the period 2016–2024, the subject was requested to identify the cash savings held at the end of each year below the threshold.

99. In response, the subject identified the cash savings from the second column of the table below as being available at the end of each year. To clarify why she did not declare any cash savings in the annual declarations submitted to NIA for the years 2016–2021, the subject stated that, at the time of each declaration, the available sums did not exceed the applicable reporting thresholds.

| Year | Cash savings identified to the Commission (at the end of the year) | Threshold under Law No. 133/2016 | NIA declaration filing date |
|---|---|---|---|
| **2012** | 94,000 MDL | - | |
| **2013** | 105,000 MDL | - | |
| **2014** | 1,000 MDL | - | |
| **2015** | 87,000 MDL + 100,000 MDL (remains from credit) | - | |
| **2016** | 98,000 MDL (at the time of declaration, no more than 79,000 MDL) | 75,750 MDL (5,050 MDL monthly) | 22 February 2017 |
| **2017** | 94,000 MDL (at the time of declaration, no more than 89,000 MDL) | 84,000 MDL (5,600 MDL monthly) | 20 March 2018 |
| **2018** | 67,000 MDL + 270,000 MDL | 92,250 MDL | 20 March 2019 |
| **2019** | 94,000 MDL | 104,625 MDL | 30 January 2020 |
| **2020** | 108,000 MDL | 119,295 MDL | 3 March 2021 |
| **2021** | 124,000 MDL | 130,740 MDL | 11 March 2022 |
| **2022** | 260,000 MDL | 148,500 MDL | 14 March 2023 |
| **2023** | 60,000 USD<br>200,000 MDL | 175,500 MDL | 6 March 2024 |
| **2024** | 60,000 USD<br>440,000 MDL | 205,500 MDL | 30 January 2025 |

100. Although the subject stated that the amounts of cash savings are estimates, the figures indicated in the first round of questions appear to be precise (for example, 94,000 MDL, 108,000 MDL). This suggests that the subject's family may have kept some record of the alleged savings accumulated over the years.

101. In contrast, during the subject's husband's evaluation under Law No. 26/2022, when asked to provide information on cash savings over the period

2008-2022, he stated that he can't remember even approximately, as he didn't think that someday after decades this information would be necessary.

102. Consequently, the Commission doubts the credibility and accuracy of the subject's identified cash savings for two reasons: (1) the subject's husband initially stated that such figures could not be recalled, yet the subject later provided rather precise annual savings amounts; (2) several identified savings exceed the threshold set by Law No. 133/2016.

103. For clarity, each of the alleged cash savings is addressed separately below. Since the cash savings at the beginning of the evaluation are discussed above, the analysis below will address the rest of the years starting with the end of 2013.

104. At the end of 2013, the subject claimed to have had cash savings of 105,000 MDL. As already noted, the alleged cash savings of 94,000 MDL at the end of 2012 were not accepted (§§ 91-94). Consequently, they were not included as income for 2013.

105. Based on the analysis of the subject's household income and expenses in 2013, as further detailed in the report, it appears that accumulating this amount would not have been possible, given the negative balance for that year (-70,203 MDL). As a result, the subject did not have the financial capacity to accumulate savings.

106. At the end of 2014, the subject claimed to have had cash savings of 1,000 MDL. Again, as will be further detailed in the report, the financial analysis indicates a negative balance for that year (-150,984 MDL). Accordingly, the subject did not have the financial capacity to accumulate savings in that year.

107. At the end of 2015, the subject claimed to have had cash savings of 187,000 MDL. Although the analysis for that year shows a positive balance (and hence is not reflected in this report), it indicates that the subject did not have the financial capacity to accumulate savings in such an amount.

108. The alleged cash savings at the end of 2016, 2017 and 2018 are not accepted, as their value exceeds the legal threshold and the subject did not disclose them in the annual declarations.

109. The cash savings at the end of 2019, 2020 and 2021 are accepted, as their value indicated by the subject is below the threshold and she was not required to declare them.

110. As of 2022, the subject became subject of evaluation under Law No. 26/2022. Since then, she regularly declared her cash savings to NIA. Thus, the Commission accepts the cash savings at the end of 2022, 2023, and 2024.

111. In light of the reasoning outlined above, the Commission includes only the accepted cash savings in its calculations. This measure is proportionately applied both to the savings available at the end of the year and the savings available at the beginning of the year, in order to ensure consistency in the financial analysis.

**A.3. Alleged discount applied to the apartment price**

112. As noted in § 61, on 23 March 2012, the subject's husband concluded an investment agreement for the acquisition of a 92,4 sq.m apartment located in Chișinău, on Branistii Street.

113. The purchase price was 38,700 EUR (430 EUR per sq.m), with 90% to be paid upfront. This, estimated at 34,830 EUR, was paid in 2011, equivalent to about 554,953 MDL. In 2012, the subject paid 16,409 MDL (approximately 1,032 EUR at the 2012 average exchange rate).

114. The handover receipt, dated 6 November 2013, indicated a higher final purchase price of 39,732 EUR due to a larger surface. Accordingly, it follows that the subject's family made an additional payment of 3,870 EUR (64,706 MDL) in 2013 (39,732 EUR – 34,830 EUR – 1,032 EUR = 3,870 EUR).

115. In the second round of questions, the subject stated that her household did not pay 39,732 EUR as indicated in the handover receipt. She submitted a statement from the insolvency administrator of the construction company, noting that the agreed contract price and installment schedule were those from the investment agreement. This document included a reference to a statement by the director of the construction company, indicating that the company's policy allegedly allowed for a 10% discount if 90% of the price was paid in a single installment prior to the contract's conclusion. As this condition was reportedly met on 29 November 2011, the 10% discount of 3,870 EUR was allegedly applied to the total purchase price of 38,700 EUR.

116. After the hearing, the subject presented an undated letter of guarantee signed by the director of the construction company, in which he guarantees the subject's husband a 10% discount if at least 90% of the price is paid upfront.

117. Despite the above, it remains unclear why the handover receipt of 6 November 2013, as a concluding document for this acquisition, states the final price of 39,732 EUR (corresponding to the contractual price of 430 EUR per sq.m).

118. According to Chapter 4 of the investment agreement, the handover of the apartment is conditioned upon full payment of the contractually agreed price. The investment contract does not have a price discount clause.

119. The statement signed by the interim insolvency administrator does not constitute solid, credible evidence absent a contractual amendment. No supporting accounting records were submitted to corroborate it.

120. The letter of guarantee signed by the company director, presented after the hearing, is undated and does not appear to be contemporaneous with the events of 2012. This letter, reportedly received by the subject from the insolvency administrator, was not attached to the Cadastral file of the building and was not presented by the subject or her husband during their evaluations under Law No. 26/2022.

121. Neither the subject nor her husband mentioned an alleged 10% discount applied to the apartment price in previous evaluation proceedings and only presented the above-mentioned documents during this evaluation, which also raises doubts regarding the veracity of these statements.

122. At the same time, point 2.2(b) of the investment agreement stipulates that, upon payment of 90% of the price at the time the contract is concluded, the remaining amount must be paid no later than five working days from the date the notification is sent in accordance with point 3.1.8 (regarding the date, time and place of signing the handover receipt), and in any case no later than the signing of the apartment handover receipt. This clause establishes an obligation to pay the remaining balance of the contract before the transfer of the apartment.

123. Moreover, the subject and her husband declared both to NIA the value of the apartment as 641,640 MDL. This closely aligns with the calculation of the total purchase price:

    a. The upfront payment of 554,953 MDL (paid in 2011) and corroborated by information from SPCSB.
    b. The second payment of 16,409 MDL (paid in 2012), corroborated by information from the insolvency administrator.

c. The inferred difference of 64,706 MDL or 3,870 EUR (paid in 2013 before the handover) between the final price indicated in the handover receipt and the amounts paid in 2011 and 2012.

124. Taken together, these amounts equal to 636,068 MDL. The minor discrepancy (641,640 MDL - 636,068 MDL) is likely attributed to currency exchange approximations over the three-years.

125. In conclusion, the Commission has identified six documents relevant to this matter:

a. the investment agreement of 23 March 2012;

b. a preliminary agreement dated 29 November 2011;

c. information from the SPCSB indicating that the subject's spouse paid the first installment of 554,953 MDL on 29 November 2011;

d. the handover receipt of 6 November 2013;

e. the statement of 3 September 2025 from the insolvency administrator of the construction company;

f. the undated letter of guarantee issued by the company's director.

126. The preliminary agreement or any potential fiscal invoice issued by the construction company was not presented to the Commission. Therefore, the most credible and contemporaneous documents are the investment agreement, which explicitly specifies the contractual price, and the handover receipt, which indicates the final amount.

127. Accordingly, on a balance of probabilities, the amount of 3,870 EUR (64,706 MDL) was most likely an expense that occurred in relation to the purchase of the apartment on Branistii street for 2013.

128. Furthermore, under the terms of the investment contract (Clause 3.3.4), the investor was responsible for covering all costs associated with the registration of rights to this property. Accordingly, it is reasonable to conclude that the expenses borne by the subject's household in 2013 for this apartment were likely higher.

**A.4. Allocation of the proceeds from the sale of three vehicles**

**A.4.1. The income from the sale of the Toyota Corolla, m/y 2014**

129. In the explanations submitted before the hearing, the subject stated that in August 2017, her son sold a Toyota Corolla, m/y 2014, for 50,000 MDL, and argued that this amount should be included in the household's financial flows for that year.

130. Earlier, in the first round of questions, the subject stated that her son purchased this vehicle in September 2015 in damaged condition. The 130,000 MDL value of this vehicle, declared in her 2015 declaration submitted to NIC, reflected only the amount her son verbally communicated. The subject did not possess any relevant documents attesting this amount.

131. She also noted that this car was owned exclusively by her son, had never been used by other members of the family and that neither her nor her husband were involved in the repairs made to the vehicle. The decision to sell the car in August 2017, shortly before the subject's son moved abroad, was also made independently by him. The subject could not confirm the sale price or present any documentary evidence regarding the transaction.

132. The same circumstances were also described by the subject's husband in the third round of questions in his evaluation under Law No. 26/2022.

133. During the hearing, the subject confirmed that her son purchased, repaired, and sold the vehicle, and that he received the sale proceeds. The subject noted that she did not know the sale price, which the Commission communicated to her during the first round of questions.

134. The subject's son was 24 years old at the time of acquisition and 26 at the sale. The subject did not declare any income from the sale of this vehicle in the 2017 NIA declaration.

135. The proximity between the sale of this car and the son's relocation abroad suggests that the funds obtained from the sale were used by the son specifically for this purpose.

136. Therefore, given that the acquisition, maintenance, use, and sale of the vehicle were all attributed to the subject's son and explicitly excluded from the family's financial control, the proceeds from the sale are not considered part of the subject's household financial flows for 2017.

**A.4.2. The income from the sale of the Volkswagen Golf Plus, m/y 2005**

137. In the explanations submitted before the hearing, the subject stated that the Commission had failed to include for 2017 the income received by the

household from the sale of a Volkswagen Golf Plus, m/y 2005 by her son for 4,500 EUR. She presented a statement dated 30 October 2025 from the buyer, V.R., certifying that at the beginning of September 2017, she purchased this vehicle by proxy, for 4,500 EUR.

138. The subject explained that she was able to identify the buyer only shortly before the hearing, to verify the price she had paid for the vehicle.

139. According to data from the PSA, the ownership right over this vehicle was transferred on 2 July 2018, through a sale-purchase contract concluded on the basis of the power of attorney dated 20 June 2018.

140. The subject did not declare any income from the sale of the vehicle in 2017 or 2018, claiming in the first round of questions that she is unable to confirm the sale price as she was not the legal owner of the vehicle and her son was no longer a family member within the meaning of the law.

141. During the hearing, the subject stated that the vehicle was the family car and that her son sold it in 2017 pursuant to a power of attorney. The subject noted that, at the time she received the rounds of questions, she did not know the sale price of the Volkswagen Golf Plus, m/y 2005. Therefore, she indicated an estimated amount of 50,000 MDL, comparable to the Toyota Corolla, m/y 2014. Later, before the hearing, with the assistance of her son's friends, she identified the buyer, who issued a written statement confirming that she paid 4,500 EUR for the Volkswagen Golf Plus, model year 2005.

142. Subsequently, during the hearing, after initially stating that she did not know the amount of the vehicle sales, the subject mentioned that she had received the funds from the sale of this car.

143. Not remembering the price reduces the likelihood that it was the subject, rather than her son, who benefited from the funds obtained from the sale. The contradictory nature of the subject's statements undermines their credibility.

144. Based on the above circumstances, it seems unlikely that the subject's household benefited from this amount, given that the subject stated expressly that she did not even know the price for which the vehicle was sold. As a result, the proceeds from the sale are not included as an incoming financial flow for 2017.

**A.4.3. The income from the sale of the Mitsubishi Lancer, m/y 2010**

145. In the explanations submitted before the hearing, the subject stated that in 2021 she sold a Mitsubishi Lancer, m/y 2010, for 94,000 MDL. She claimed that the sale of this vehicle in December 2021 and the sale of the Toyota RAV-4, m/y 2008, in January 2022 conditioned the purchase of the new Toyota C-HR, m/y 2018, in February 2022.

146. The subject maintained that the proceeds from the sale of the Mitsubishi Lancer, m/y 2010, were available as cash funds at the beginning of 2022.

147. In contrast with the above, in the first round of questions, the subject stated that the vehicle belonged to her son, who was abroad at the time of purchase. According to her, the subject's son's friends purchased the car in Germany and imported it into the Republic of Moldova. As her son's return to the country was delayed, he asked his parents to register the car in their name. The subject registered ownership of the Mitsubishi Lancer, m/y 2010, on 30 June 2018. She concluded a formal contract at a nominal price.

148. The subject's husband also reported the same circumstances during his evaluation conducted under Law No. 26/2022. He stated that the vehicle was paid for directly by their son to the friends who initially purchased it, and that the registration of ownership was purely a formal procedure.

149. During the hearing, the subject confirmed that the funds obtained from the sale of this car at the end of 2021 were used to purchase the Toyota C-HR, m/y 2018, at the beginning of 2022.

150. Based on the above circumstances, and because this vehicle was not purchased by the subject and belonged to her only formally, it does not seem plausible that the funds obtained from its sale constituted an inflow to the subject's household in 2021.

**A.4.4. Conclusion regarding the three vehicles**

151. The Commission does not attribute the income obtained from the sale of the three vehicles mentioned above to the subject's household for the following reasons:

a. None of the proceeds from the sale of these vehicles was disclosed in the relevant NIA declarations. The subject declared the vehicles (Toyota Corolla, m/y 2014, and Volkswagen Golf Plus, m/y 2005) as belonging to her son. Only with respect to the Volkswagen Golf Plus did the subject declare an usufruct right.

b. As of 2015, the subject ceased to declare her son as a dependent on the FVID forms submitted to SFS. Starting in 2016, her son was no longer declared as a dependent in the annual declarations submitted to NIA. As a result, the subject's son had independent sources of income and incurred his own expenses.

c. The subject, in fact, owned none of the vehicles. The Toyota Corolla, m/y 2014, and Volkswagen Golf Plus, m/y 2005, were registered under the subject's son, while the Mitsubishi Lancer, m/y 2010, formally was registered to the subject, who acknowledged that it was, in fact, her son's car.

d. In response to the rounds of questioning, both the subject and her husband stated that the cars were purchased and used by their son. The subject noted that only the Volkswagen Golf Plus, m/y 2005, was a family car, which she and her husband also used.

e. The subject repeatedly noted, including during the hearing, that she was not aware of the sale price of any of the three vehicles, which reduces the likelihood that she received any financial benefit from the sales.

f. The subject made several contradictory statements regarding the sale of the vehicles, which diminishes the credibility of her arguments.

152. It may be that the Volkswagen Golf Plus, m/y 2005, was a family car and was also used by the subject and her husband, especially given that the subject registered a usufruct right. However, if it were to accept that the subject's household received the proceeds from its sale, this income should be considered an inflow for 2018, a year with a positive balance.

153. While both the subject and the buyer claim that the vehicle was sold in September 2017, the documents available in the evaluation file confirm that the sale occurred in 2018.

154. The power of attorney authorizing the buyer, V.R., to undertake certain legal actions concerning the Volkswagen Golf Plus, m/y 2005, was issued on 20 June 2018. The sale agreement for this vehicle, pursuant to the 20 June 2018 power of attorney, was concluded on 2 July 2018, the exact date on which ownership was transferred. Aside from V.R.'s recent written statement dated 30 October 2025, no contemporaneous evidence has been presented to confirm that the vehicle was sold in 2017.

155. If the vehicle had indeed been sold in September 2017, as stated by the subject, it would imply that the subject's family did not have a car until November 2017, when the subject's husband purchased a Toyota RAV-4, m/y 2008. This appears unlikely, considering the considerable distance between the spouses' workplaces at that time.

156. Based on the foregoing circumstances, the Commission concludes that the sale of this vehicle most likely occurred in 2018, not in 2017 as claimed by the subject. Accordingly, even if the Commission were to accept that the subject's household received income of EUR 4,500, the negative balance for 2017 would remain unchanged.

157. Notably, on 30 June 2018, ten days after the power of attorney was issued to the buyer of the Volkswagen Golf Plus, m/y 2005, the subject's son, with the subject's assistance in registering the ownership rights, purchased the Mitsubishi Lancer, m/y 2010. This timing suggests that the proceeds from the sale of the Volkswagen Golf Plus, m/y 2005, may have been used in 2018 to finance the purchase of the Mitsubishi Lancer, m/y 2010.

158. Regardless of which of the above scenarios applies, the negative balance for 2017, as set out below, remains unaffected.

**A.5. Inexplicable wealth per year**

**A.5.1. Inexplicable wealth in 2013**

*Incoming financial flows*

159. According to SFS data, in 2013, the subject earned 80,145 MDL as a judge at the Orhei Court, and her husband earned 76,182 MDL as a judge at the Criuleni Court.

160. Information received from the banks indicated that at the end of 2012 and the beginning of 2013, the subject's family had available funds of 19,882 MDL in a bank account. This amount is considered incoming cash flow as savings from the previous year.

161. In the first round of questions, the subject indicated cash savings of 94,000 MDL available at the end of 2012. For the reasons set forth in §§ 91-96, these are not included in the 2013 calculations.

162. On 27 June 2013, the subject sold the Volkswagen Polo, m/y 2004, for 83,200 MDL. This vehicle was purchased for 60,000 MDL. Although the

Commission expressed doubts about this price in §52, it considered this amount as income.

163. In the second round of questions, the subject claimed a donation from her father-in-law in the amount of 17,000 MDL in 2013. The subject's father-in-law passed away in June 2013.

164. Until June 2013, the father-in-law's pension amounted to 17,804 MDL. The mother-in-law's pension in 2013 amounted to 12,921 MDL. The CEP for 2013 was 28,806 MDL (1,698 x 12 months (mother-in-law) + 1,698 x 5 months (father-in-law). Therefore, the difference between the parents-in-law's income and CEP was 1,919 MDL in 2013. Based on the above reasoning, the Commission finds it improbable that the donation was made in full, although the subject insisted that it was.

165. The alleged donation was not reported in the annual declarations submitted by the subject and her husband to the relevant authorities. Therefore, the Commission does not include it in the calculation.

166. As a result, for 2013, the subject's household had a total verifiable incoming cash flow of 259,409 MDL.

*Outgoing financial flows*

167. The estimated CEP for the subject's family in 2013 was 98,112 MDL (2,044 MDL x 12 months x 4 family members).

168. As noted in §§ 112-128, the Commission considers the amount of 3,870 EUR (64,706 MDL) a financial outflow for 2013, being the final payment for the apartment on Braniștii Street.

169. The subject stated that her family moved into the apartment on Branistii Street at the end of 2013. Therefore, it follows that considerable investments were made in the finishing works and furnishing of the white-wall apartment received on 6 November 2013.

170. When asked about these costs, the subject stated that the finishing work was performed by family members, thereby avoiding labor costs. The sources of these funds were the household's own savings and financial support from parents. She reported a total of 49,000 MDL (approximately 2,500 EUR) in expenses incurred over a five-year period (2013–2017), distributed as follows.

| Year | 2013 | 2014 | 2015 | 2016 | 2017 |
|---|---|---|---|---|---|
| Costs, MDL | 1,000 | 20,000 | 3,000 | 15,000 | 10,000 |

171. These amounts appear implausible, particularly given that only 1,000 MDL was spent in 2013 to make the apartment habitable. The apartment, measuring 92.4 sq.m and delivered in a white-wall condition, would have required substantial investment to cover basic finishing works, including flooring, plastering, painting, interior doors, electrical and sanitary installations, and kitchen fittings. Even assuming no labor costs, the expense of construction materials alone would significantly exceed the declared amounts. Moreover, the subject acknowledged purchasing new kitchen cabinets, a bed, and four interior doors—items that, individually, could reasonably exceed the declared annual renovation expenses.

172. The declared renovation costs seem significantly understated and unaligned with the market realities. Although likely higher, the 1,000 MDL spent in 2013 is included for the apartment's finishing expenses.

173. On 27 May 2013, the subject's son became the owner of a Volkswagen Golf Plus, m/y 2005. The subject stated in the first round of questions that the vehicle's purchase price of 100,000 MDL was paid by her household. The subject's husband confirmed the same during the third round of questions in his evaluation under Law No. 26/2022. Although the car was registered in the name of the subject's son, the son did not have the financial capacity to make this purchase. At that time, the subject's son was 22 years old and had no income of his own, a fact confirmed by both the subject and her husband.

174. In 2013, the subject repaid 48,877 MDL to BC MAIB S.A. in connection with the 270,000 MDL loan contracted in 2012.

175. In the first round of questions, the subject indicated cash savings of 105,000 MDL available at the end of 2013. For the reasons set forth in § 105, these are not included in the 2013 calculations.

176. The information received from the banks indicated that, as of the end of 2013, the subject's household held 16,917 MDL in a bank account.

177. As a result, in 2013, the subject's household had a total outgoing cash flow of at least 329,612 MDL. Consequently, in this year, the financial outflows exceeded the inflows by 70,203 MDL.

*Incoming and outgoing financial flows for 2013*

| Income | | Expenses | |
|---|---|---|---|
| Subject's salary | 80,145 MDL | CEP | 98,112 MDL |
| Husband's salary | 76,182 MDL | Installments for the apartment on Branistii street | 64,706 MDL |
| Sale of vehicle | 83,200 MDL | Finishing expenses for the apartment on Branistii street | 1,000 MDL |
| Bank savings | 19,882 MDL | Loan repayment to MAIB | 48,877 MDL |
| - | - | Purchase of vehicle | 100,000 MDL |
| - | - | Bank savings | 16,917 MDL |
| **Total** | **259,409 MDL** | **Total** | **329,612 MDL** |
| **Difference** | **-70,203 MDL** | | |

178. Even if the Commission accepted the alleged donation from her parents-in-law (17,000 MDL), the balance would still be -53,203 MDL.

**A.5.2. Inexplicable wealth in 2014**

*Incoming financial flows*

179. According to SFS data, in 2014 the subject earned 119,316 MDL as a judge at the Orhei Court, and her husband earned 119,915 MDL as a judge at the Criuleni Court.

180. Information received from the banks indicated that at the end of 2013 and the beginning of 2014, the subject's family had available 16,917 MDL in a bank account. This amount is considered incoming cash flow as savings from the previous year.

181. In the first round of questions, the subject indicated cash savings of 105,000 MDL available at the end of 2013. For the reasons detailed in § 105, these are not included in the calculations for 2013.

182. In the second round of questions, the subject claimed to have received donations from parents totaling 65,000 MDL in 2014. The alleged donation was not reported in any of the annual declarations submitted by the subject and her husband to the relevant authorities.

183. Moreover, the subject claimed that, from autumn 2013 to spring 2014, following her father-in-law's death in June 2013, they sold beehives, a horse, and various agricultural equipment. It was also claimed that the mother-in-law had additional income during that period, in addition to her pension and the sale of agricultural products. Still, no supporting documents could be provided because the agricultural products were sold to private individuals for cash.

184. By using the term *„parents"* in the context of the alleged donation, the subject fails to distinguish between her own parents and her in-laws. The subject's father passed away before the start of the evaluation period, and the subject's father-in-law died in June 2013. Therefore, the Commission will refer only to the financial capacity of the subject's mother and mother-in-law.

185. The Commission was not presented with relevant evidence demonstrating the financial capacity of either the mother or the mother-in-law to make donations amounting to 65,000 MDL in 2014.

186. Regarding the subject's mother-in-law, based on the information gathered by the Commission, her annual pension in 2014 amounted to 13,767 MDL, while the CEP in the same year was 21,204 MDL (1,767 x 12 months x 1 person). Therefore, she lacked the financial capacity to make the donation.

187. Furthermore, as mentioned above in § 57, in the SCJ's Decision of 12 August 2025, the court rejected the subject's arguments regarding the in-laws' additional sources of income (§ 402). In this evaluation, no reason was provided to depart from the conclusions of the Supreme Court.

188. As to the financial capacity of the mother of the subject, the SCJ concluded the following (§§ 403-406):

> The panel notes that, according to data aggregated by the Commission from information systems, the claimant's mother earned monthly pension income ranging from 459 MDL (2007) to 1,089 MDL (2014, the year the loan was

repaid) and additionally received social allowances of 260 MDL (2010) and 390 MDL (2011).

Correlating these data shows that the claimant's mother's total cumulative income for the period 2007–2014 amounted to 81,404 MDL, while the minimum consumer basket for the same period totaled 113,892 MDL; this difference indicates an objectively limited capacity to accumulate significant savings or to make substantial donations to the claimant's family.

The panel notes that, in response to the Commission's notification regarding the facts and serious doubts, Veronica Cupcea submitted for the first time documents concerning potential additional sources of her mother's income: a compensation of 5,017 MDL (2007) for damage caused by theft, 1,200 MDL from the sale of a bicycle, and a mention of the sale of a "Moskvich 412" car in the period 2009–2010; however, in the absence of the sale price of the car, quantifying the actual contribution remains impossible.

The panel further notes that documents were submitted showing that the claimant's mother held shares in two commercial companies, generating income of 1,150 MDL in 2013; these amounts, by their nature and size, are of limited relevance in relation to the financial requirements of the analyzed transactions and are insufficient to overturn the Commission's conclusions regarding the actual capacity to support, through donations, the 2012 acquisitions and the 2014 loan repayment.

189. Based on the reasoning set out above, the Commission considers it improbable that the alleged donation of 65,000 MDL was made and does not include in the 2014 calculation.

190. As a result, for 2014, the subject's household had a total verifiable incoming cash flow of 256,148 MDL.

*Outgoing financial flows*

191. The estimated CEP for the subject's family in 2014 was 101,952 MDL (2,124 MDL x 12 months x 4 family members).

192. During the period from January to June 2014, the subject made loan repayments totaling 267,611 MDL to BC MAIB S.A. in connection with the 270,000 MDL loan contracted in 2012. Between November 2012 and May 2014, the subject paid the installments of this loan in accordance with the repayment schedule. In June 2014, through a single payment, the subject fully repaid the loan.

193. The subject stated that the early repayment of the loan was motivated by high interest rates and explained the financial capacity citing cash savings in the estimated amount of 120,000 MDL, the household's income accumulated up to the date of the payments and the alleged donation in the amount of 65,000 MDL from the parents. As noted above, the Commission did not accept the alleged cash savings of 105,000 MDL, which the subject claimed to have had available at the beginning of 2014, as well as the purported donation from the parents. The rest of the household income was included in the calculation of inexplicable wealth, as presented in the table below.

194. The subject stated that in 2014, she spent 20,000 MDL on renovation and furnishing the Branistii street apartment.

195. Based on the arguments set out in §§ 171-172, the Commission considers that these finishing expenses of a 92,4 sq.m apartment are underestimated. Despite this implausibility of the disclosed figure, 20,000 MDL is included in the calculation.

196. The information received from the banks indicated that, as of the end of 2014, the subject's household held 17,569 MDL in a bank account.

197. In the first round of questions, the subject indicated cash savings of 1,000 MDL available at the end of 2014. For the reasons outlined in § 106, these are not included in the 2014 calculations.

198. Thus, in 2014, the subject had a total outgoing cash flow of 407,132 MDL.

199. As a result, in 2014, financial outflows appear to have exceeded inflows by 150,984 MDL.

*Incoming and outgoing financial flows for 2014*

| **Income** | | **Expenses** | |
|---|---|---|---|
| Subject's salary | 119,316 MDL | CEP | 101,952 MDL |
| Husband's salary | 119,915 MDL | Finishing expenses for the apartment on Branistii street | 20,000 MDL |
| Bank savings | 16,917 MDL | Loan repayment to MAIB | 267,611 MDL |

| | | | |
|---|---|---|---|
| | | Bank savings | 17,569 MDL |
| **Total** | **256,148 MDL** | **Total** | **407,132 MDL** |
| **Difference** | **-150,984 MDL** | | |

### A.5.3. Inexplicable wealth in 2017

*Incoming financial flows*

200. According to SFS data, in 2017, the subject earned a salary of 192,954 MDL as a judge at the Orhei Court, 984 MDL from the Criminal Reform Institute, and 1,100 MDL from CNAS. The subject's husband received an allowance of 120,122 MDL and a pension of 189,057 MDL.

201. Information received from the banks indicated that at the end of 2016 and the beginning of 2017, the subject's family had available funds of 30,066 MDL in a bank account. This amount is considered incoming cash flow as savings from the previous year.

202. In the first round of questions, the subject indicated cash savings of 98,000 MDL available at the end of 2016. For the reasons detailed in § 108, these are not included in the calculations for 2017.

203. Furthermore, based on the arguments set out in §§ 129-158, the Commission does not include the funds obtained from the sale of the Toyota Corolla, m/y 2014, and the Volkswagen Golf Plus, m/y 2005, by the subject's son as a financial inflow for the year 2017.

204. Additionally, in her responses to the second round of questions, the subject stated that her son's income constitutes a contribution to the household. According to her, in 2017, her son contributed 3,640 MDL to the household. The subject attached a certificate from Law Office Rîșcani confirming that the subject's son worked there as a trainee lawyer and lawyer during the period 2014–2022, and that, in 2017, he earned 4,550 MDL.

205. However, SFS data indicate that in 2017, the son incurred a loss from his legal practice. Thus, no verified income can be attributed. Furthermore, as detailed in §§ 208-209, the Commission excluded the subject's son from the calculation

of the CEP for 2017. Therefore, even if he had reported any income, it would not be relevant to the calculation.

206. As a result, for 2017, the subject's household had a total verifiable incoming cash flow of 534,383 MDL.

*Outgoing financial flows*

207. The estimated CEP for the subject's family in 2017 was 93,564 MDL (2,599 MDL x 12 months x 3 family members).

208. Although the subject stated that her son (the fourth family member) moved abroad in August 2017, the Commission did not include him in the CEP calculations for the entire year.

209. However, the Commission notes that it did not identify any other sources of income for the subject's son during that period. Therefore, it is reasonable to assume that his maintenance was covered by the financial resources of the subject's household, which would increase the deficit for the year 2017.

210. In the first round of questions, the subject declared several expenses for 2017. These included an investment of 200,000 MDL in sewerage and plastering works at the property located in Pașcani, Criuleni District; 6,000 MDL for the daughter's studies; and 195 EUR (equivalent to 4,062 MDL) for plane tickets for a trip to Nuremberg, Germany. The declared amount for the trip reflects only the cost of plane tickets, while other associated travel expenses—such as accommodation, meals, or local transportation—were not reported. This indicates that the overall expenditure for 2017 was likely higher than the amounts presented, suggesting that the declared financial outflows for that year may be understated.

211. The subject also stated that in 2017 she spent 10,000 MDL on renovations and furnishings for the apartment on Branistii Street.

212. Based on the arguments set out in §§ 171-172, the Commission considers that these expenses are underestimated. Despite the implausibility of the declared figure, the Commission includes it in the calculation.

213. On 13 November 2017, the subject's husband purchased a Toyota RAV-4, m/y 2008. In the annual declaration submitted to NIA for the year 2018, the subject declared that the purchase price of the vehicle was 240,000 MDL. In the first round of questions (Question 24 (a), the subject confirmed that the price was paid in a single lump sum in cash.

214. The information received from the banks indicated that, as of the end of 2017, the subject's household held 10,092 MDL in a bank account.

215. In the first round of questions, the subject indicated cash savings of 94,000 MDL available at the end of 2017. For the reasons detailed in § 108, these are not included in the calculations for 2017.

216. Thus, in 2017, the subject had a total outgoing cash flow of 563,718 MDL.

217. Consequently, in 2017, financial outflows appear to have exceeded inflows by 29,335 MDL.

*Incoming and outgoing financial flows for 2017*

| **Income** | | **Expenses** | |
|---|---|---|---|
| Subject's salary | 192,954 MDL | CEP | 93,564 MDL |
| Criminal Reform Institute income | 984 MDL | Purchase of vehicle | 240,000 MDL |
| CNAS | 1,100 MDL | Reparation and furnishing of Pascani property | 200,000 MDL |
| Husband's allowances | 120,222 MDL | Daughter's studies | 6,000 MDL |
| Husband's pension | 189,057 MDL | Holidays | 4,062 MDL |
| Bank savings | 30,066 MDL | Bank savings | 10,092 MDL |
| | | Finishing expenses for the apartment on Branistii street | 10,000 MDL |
| **Total** | **534,383 MDL** | **Total** | **563,718 MDL** |
| **Difference** | **-29,335 MDL** | | |

#### A.5.4. Inexplicable wealth in 2020

*Incoming financial flows*

218. According to SFS data, in 2020, the subject earned a salary of 300,887 MDL as a judge at the Orhei Court, 1,701 MDL from the Criminal Reform Institute, and 3,545 MDL from the National Institute of Justice. The subject's husband had a net income as a lawyer of 6,070 MDL and a pension of 239,256 MDL.

219. Information received from the banks indicated that at the end of 2019 and the beginning of 2020, the subject's family had available funds of 120,202 MDL in a bank account. This amount is considered incoming cash flow as savings from the previous year.

220. In the first round of questions, the subject indicated cash savings of 94,000 MDL available at the end of 2019. For the reasons outlined in § 109, these are included in the 2020 calculations.

221. In the second round of questions, the subject mentioned a loan of 150,000 MDL received from her son, who was working abroad at the time.

222. The Commission does not accept this loan as an inflow for the following reasons. Firstly, no evidence has been presented regarding the son's possession of these funds or their transfer to his parents. Secondly, the subject did not declare the 150,000 MDL loan in the 2020 declaration submitted to NIA. The subject initially explained this omission, invoking Article 4 para. (3) of Law No. 133/2016, which exempts gifts from family members from declaration. However, the exemption applies only if the value does not exceed 10 times the average national salary. The sum received exceeded the 2020 threshold of 87,160 MDL, making declaration mandatory.

223. These conclusions are also reflected in SCJ's Decision of 12 August 2025 (§§ 440-442).

224. During the public hearing, in relation to the above, the subject stated that each time he returned to the country, her son would bring in USD 10,000 in cash. The funds were kept in the subject's house, and the subject and her husband accessed them as needed. The subject further stated that she did not declare this alleged loan of 150,000 lei because she used the money and returned it (*put it back*) within the same year.

225. These explanations contradict the subject's arguments regarding the incoming flow of 150,000 MDL for 2020. If the Commission accepts that the

subject accessed the son's funds, spent them within the same year and subsequently returned them by the end of that year, the outcome is the same as if these funds had never been accessed. Therefore, the Commission does not include this amount in the calculation of 2020 incoming flows.

226. The Commission also notes the contradictory nature of the subject's statements regarding this alleged loan, which undermines her credibility.

227. Thus, for 2020, the subject's household had a total verifiable incoming cash flow of 765,661 MDL.

*Outgoing financial flows*

228. The estimated CEP for the subject's family in 2020 was 136,116 MDL (3,781 MDL x 12 months x 3 family members).[5]

229. In the first round of questions, the subject reported several expenses for the year 2020. These included 31,000 MDL for the construction of a gazebo on the family's property in Pascani, Criuleni; 8,500 MDL for the daughter's studies; 19,298 MDL for the purchase of two mobile devices, an iPhone 11 Pro and a Samsung model. The latter are identified as individual retail expenditures.

230. On 6 July 2018, the subject's husband contracted a 540,000 MDL loan from BC MAIB S.A, due on 23 June 2028. However, the loan was fully reimbursed ahead of schedule, on 29 June 2021. In 2020, the subject's household reimbursed 497,200 MDL.

231. The information received from the banks indicated that, as of the end of 2020, the subject's household held 20,027 MDL in a bank account.

232. In the first round of questions, the subject indicated cash savings of 108,000 MDL available at the end of 2020. For the reasons detailed in § 109, these are included in the 2020 calculations.

233. Therefore, in 2020, the subject had a total outgoing cash flow of 820,141 MDL.

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[5] The CEP for any year between 2019-2024 is calculated based on NBS methodology and the method available on the NBS site (ENG). In this case, the indicator of Consumption expenditures by population according to purpose of expenditures, number of children and area 2019-2022 is chosen with the following variables: Year - Consumption expenditures total – Area (Urban/Rural) – Number of children (if no children, without children is chosen) – Lei, average monthly per capita for one person. The generated result is multiplied by the number of family members and 12 calendar months.

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.

234. As a result, in 2020, financial outflows appear to have exceeded inflows by 54,480 MDL.

*Incoming and outgoing financial flows for 2020*

| Income | | Expenses | |
|---|---|---|---|
| Subject's salary | 300,887 MDL | CEP | 136,116 MDL |
| Criminal Reform Institute income | 1,701 MDL | Construction of gazebo | 31,000 MDL |
| National Institute of Justice | 3,545 MDL | Daughter's studies | 8,500 MDL |
| Husband's income | 6,070 MDL | Miscellaneous expenses | 19,298 MDL |
| Husband's pension | 239,256 MDL | Bank loan early repayment | 497,200 MDL |
| Bank savings | 120,202 MDL | Bank savings | 20,027 MDL |
| Cash savings | 94,000 MDL | Cash savings | 108,000 MDL |
| **Total** | **765,661 MDL** | **Total** | **820,141 MDL** |
| **Difference** | **-54,480 MDL** | | |

### A.5.5. Conclusion regarding inexplicable wealth

235. Based on the circumstances described above, the subject's household incurred the following inexplicable wealth:

| Year | Amount in inexplicable wealth, MDL |
|---|---|
| 2013 | -70,203 |

| | |
|---|---|
| 2014 | -150,984 |
| 2017 | -29,335 |
| 2020 | -54,480 |
| **Total** | **-305,002** |

236. Therefore, the Commission has identified a negative financial balance of -305,002 MDL, which exceeds the threshold of 20 average salaries (234,000 MDL) required under Article 11 para. (3) lit. a) of Law 252/2023 to establish a subject's lack of financial integrity.

237. If the Commission had considered the alleged donation of 17,000 MDL in 2013, when both her parents and in-laws were alive and able to work, the total inexplicable wealth would amount to -288,002 MDL.

238. Conversely, if the Commission had not accepted the cash savings below the declaration threshold (for 2019, 2020, and 2021) due to financial incapacity to accumulate, as determined by the analysis of previous years, the identified inexplicable wealth would have been -391,377 MDL.

239. For the reasons stated, the Commission concludes that the subject's inexplicable wealth is at least -305,002 MDL or likely even higher. This conclusion is supported by the subject's understatement of the apartment's finishing and furnishing costs on Braniștii Street. Likewise, the conclusion is supported by the exclusion of the subject's son from the CEP calculations in 2017.

## VI. Conclusion

240. Based on the information it obtained and the subject's explanations, 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. 252/2023.

## VII. Further action and publication

241. As provided in Article 40 para. (4) 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.

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

243. 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.

244. This evaluation report was approved by a unanimous vote of the Panel members on 18 December 2025 and signed pursuant to Articles 33 para. (2) and 40 para. (5) of the Rules.

245. Done in English and Romanian.

Andrei Bivol

Chairperson of the Commission

Chair of Panel C