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# Law No. 100/2025: New rules for electoral integrity and prevention of illegal influence

*Law No. 100 of 13 June 2025, amending several legislative acts for the effective combating of electoral corruption and related phenomena, represents the most extensive legislative reform in recent years aimed at strengthening the integrity of the electoral process in the Republic of Moldova. Arising from serious shortcomings identified in recent elections - such as voter bribery, the involvement of criminal networks and foreign actors, the orchestration of paid protests, and the use of unregistered entities - the law establishes a new set of rules.*

*This document provides an analysis of the key provisions adopted: the expansion of the definition of electoral bribery to include the mere promise of benefits; harsher sanctions for those involved in manipulating votes; strict limits on funding from vulnerable or disproportionate sources; regulation of unauthorized campaigning; and the prohibition of charitable actions used for political image-building. The law also strengthens democratic protection tools against extremism, introduces traceability in political party structures and activity, and accelerates judicial proceedings related to electoral corruption cases.*

The adoption of Law No. 100/2025 is a response to systemic imbalances and concrete risks identified in recent elections. Issues repeatedly raised by observers and national institutions included voter bribery, non-transparent campaign financing, foreign interference, the artificial mobilization of citizens to attend paid protests, and the infiltration of extremist organizations into the public sphere. The new law does not merely amend the Electoral Code - it proposes a broad restructuring of the legal framework governing elections, political party activity, and the protection of the democratic system.

A key amendment is the redefinition and expansion of the offence of electoral bribery. Whereas the previous Criminal Code targeted only the giving of money or goods to voters, the new Article 181<sup>1</sup> also criminalizes the promise of such benefits, even if they are never delivered. From now on, the expressed intention to reward a vote - whether through goods, services, advantages, or privileges - constitutes a criminal offence. Depending on the severity of the case and the status of the individual involved, sanctions range from significant fines to prison terms of up to 15 years. Special penalties are provided for bribery committed by electoral candidates, campaign team members, observers, or officials involved in organizing elections. The law also introduces harsher penalties for bribery committed in groups, against a large number of individuals, or involving public funds. A new provision criminalizes bribery financed by organized criminal groups, extremist organizations, or directly by a foreign state. In such cases, penalties range from 7 to 15 years in prison and fines of up to 2,350 conventional units, and legal entities may face dissolution.

Complementing the Criminal Code provision, the new law also qualifies the acceptance of promises of goods or services for electoral purposes as passive electoral bribery. The Contraventions Code was amended to also include sanctions for campaigning outside the official campaign period. Campaign activities carried out by unregistered entities - such as non-governmental organizations, trade unions, employer associations, religious groups, or other entities not officially participating in elections - are explicitly prohibited.

A significant focus is placed on preventing fraudulent campaign financing. Clear ceilings are set for donations made by economically vulnerable individuals and legal entities. Citizens who rely solely on social benefits (pensions, scholarships, or allowances) may donate no more than the equivalent of one average monthly salary and, in any case, no more than 30% of their annual income from such sources. Similarly, legal entities are restricted to donations of no more than 12 average monthly salaries or 30% of their annual declared income. These thresholds aim to prevent the use of proxy donors and ensure campaign funding remains proportional to actual financial capacity.

The law also addresses the phenomenon of paid and organized mobilization of participants for protests or public assemblies. Both those who offer and those who accept money or other benefits to attend events with anti-democratic purposes are subject to penalties. In some cases, sanctions may include bans on holding office positions or engaging in certain professional activities. In addition, the law prohibits the organized transport of participants to unauthorized gatherings. These measures aim to prevent simulated or manipulated forms of protest that distort public debate and erode trust in participatory mechanisms.

For the first time, the political use of charitable acts is explicitly regulated. According to the new provisions, party presidents, vice presidents, executive body members, and electoral candidates are prohibited from publicly promoting philanthropic or sponsorship activities. Public communication of such actions is forbidden, and any related expenditures must be reported in financial statements submitted to the Central Electoral Commission. The ban does not prevent charitable activities but ensures they are not instrumentalized for political branding.

Important changes have also been introduced to the legal regime governing political parties. A new provision prohibits the establishment of a political party that inherits the ideology, leadership, or infrastructure of a party previously declared unconstitutional. Courts are tasked with verifying whether continuity exists between a banned entity and a new one, while the Public Services Agency must suspend registration processes until a final ruling is issued. Additionally, all parties are now required to maintain an up-to-date member registry, organized by territorial branches, and to submit it periodically to the Central Electoral Commission and the Public Services Agency. Failure to comply may result in suspension of the party's activities for up to 12 months.

The law also clarifies procedures related to the loss of party membership or political leadership positions. Membership ends not only upon withdrawal from the party but also upon written notification submitted directly to the Public Services Agency. Leadership status becomes legally void only after the official registration of changes.

The security dimension is also reinforced. The law expands the definition of extremist activity to include not only acts of violence or propaganda, but also separatist, ideological, or destabilizing

initiatives carried out by unregistered organizations, individuals, or media entities. Those who actively support organizations declared extremist may be entered into a special register and face legal restrictions on access to strategic roles in areas such as defense, security, public media, or energy. The law also enables the swift blocking of online extremist content via orders issued by the Intelligence and Security Service, subject to later judicial review.

To avoid delays in cases involving electoral integrity, the law sets strict deadlines for resolving electoral bribery cases. Criminal investigations must be completed within six months, first-instance rulings issued within four months, and appeals resolved within two months. These deadlines aim to eliminate unjustified delays and restore public trust in the efficiency and impartiality of judicial institutions.

In summary, Law No. 100/2025 introduces a comprehensive and interdependent legal framework, where the fight against electoral corruption is directly connected with data protection, the regulation of protests, party accountability, and national security.

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Since its founding in 2000, ADEPT has been at the forefront of efforts for good governance, electoral integrity, and civic engagement through research, advocacy, and public information. Since 2018, ADEPT has hosted the Secretariat of the Coalition for Free and Fair Elections (CALC), a platform uniting civil society organizations to ensure transparency, inclusion, and integrity in Moldova’s electoral processes.

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