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**ELECTIONS
AS A MATTER
OF NATIONAL
SECURITY:
PROTECTING
ELECTORAL
INTEGRITY
UNDER HYBRID
THREATS**

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ELECTIONS AS A MATTER OF NATIONAL SECURITY:

PROTECTING ELECTORAL INTEGRITY UNDER HYBRID THREATS

Executive Summary

Moldova has a particularly vulnerable position on Europe's eastern border, facing sustained hybrid pressure while having limited conventional deterrence capabilities and no external security guarantees. In this context, elections have become more than a domestic democratic process: they are also a potential entry point for external actors seeking to influence Moldova's strategic position through illicit financing, political proxies, information manipulation and disruption of electoral infrastructure.

The 2024 and 2025 electoral cycles demonstrated both the scale of this challenge and Moldova's growing capacity to respond. International observers documented serious foreign interference, illicit financing, cyberattacks, and widespread disinformation, while assessing the 2025 elections as competitive and professionally administered [8, 34]. Compared with 2024, when many interventions were largely reactive, the 2025 response was considerably more proactive: legislation was strengthened, enforcement began earlier, institutional coordination improved and authorities acted to disrupt identified risks before they could fully materialize.

Although this shift produced important results, it also exposed new challenges. Foreign interference networks adapted rapidly, moving towards digital platforms, third-party actors, influencers, crypto-assets, and other channels that remain difficult to regulate or monitor. At the same time, preventive measures taken

under significant time pressure can themselves become vulnerable to contestation if their legal basis, proportionality, transparency or avenues for effective remedy are insufficiently clear. In a society where institutional trust is uneven, such controversies can be exploited to reinforce narratives of censorship, political exclusion, and institutional bias.

Moldova's next task is therefore to further consolidate the proactive approach developed in 2025 into a predictable and resilient system of electoral security. This requires permanent inter-institutional capacity, stronger oversight of digital and financial channels, continued cooperation with international partners, and sustained support for independent and non-partisan civil society. Given the geopolitical context, for Moldova protecting electoral integrity is increasingly a national-security matter, and its long-term effectiveness will depend on preserving the public trust and democratic legitimacy in the defensive nature of these measures.

1. Security context : why Moldova

Much of the European debate on a possible Russian escalation focuses on the Baltic states. However, Moldova may be the more likely target, particularly if Moscow seeks to test Western resolve. On September 11, 2026, at the Yalta European Strategy meeting in Kyiv, former CIA Director David Petraeus argued that Moldova is much more likely than Lithuania to be next, because it is much weaker [1].

Indeed, while the Baltic states have NATO's Article 5 and allied troops on their soil, Moldova is constitutionally neutral (Article 11), belongs to no alliance and has no security guarantees. Its defense spending stands at about 0.6% of GDP, with a target of 1% only by 2030 [2], and recent reforms have brought limited change in its capacity to deter or respond to military threats [3].

Russia currently has no land access for a ground operation against Moldova, since Ukraine keeps the Odesa region out of reach, although Moscow still treats its capture as a military priority [3]. Until then, the cheaper route is a political one. According to security experts, "an optimal scenario for Russia in Moldova would be the installation in power of pro-Kremlin proxies" [3]. A Moscow-friendly government could halt EU accession, end Moldova's political and logistical support for Ukraine and, at the extreme, allow Moldovan territory and the Transnistrian region to be used against Ukraine [4].

Elections are the main point of entry for such a scenario. A government brought to power through a manipulated but formally valid election carries democratic legitimacy. Its decision to reverse Moldova's course would thus be presented as the sovereign will of the people, and any Western reaction could be framed as interference in Moldova's internal affairs. For Moscow, capturing an election costs a fraction of a military operation and produces a result that is hard to contest.

Social and economic pressure widens this opening. The National Bank expects inflation to approach 9.2% by the end of 2026, driven by energy, fuel and food prices [5], which further feeds the resentment toward the authorities and makes voters more receptive to anti-EU rhetoric and manipulation. Russian drone incursions into Moldovan airspace add fear to the mix. According to the Moldovan StratCom Center, they come with waves of online propaganda designed to amplify fear and dissatisfaction with the authorities and with the EU integration path [6]. For Moldova and its Western partners, electoral integrity is increasingly a matter of national security to be treated as top priority.

2. What happened and how Moldova responded

Between October 2024 and September 2025, Moldovans voted 3 times: in a constitutional referendum on EU accession, a 2-round presidential election and parliamentary elections. International observers found both cycles well run, while recording illicit foreign interference in 2024 and "unprecedented hybrid attacks" in 2025 [7, 8]. The interference worked continuously before, during and after the elections as a single operation run through several channels. The same infrastructure, namely the Șor network, the Russian NGO Evrazia, the sanctioned Promsvyazbank and Telegram, financed vote-buying, untransparent paid online content, outreach to clergy and street mobilization [14, 15, 16]. Moldova's response, and its results, differed from

one channel to another.

Illicit finance. In 2024 the Russian interference operation relied on cash payments to voters. Police traced \$39 million sent through Promsvyazbank by late October 2024. In September 2024 alone, about 130,000 citizens received payments after being recruited through Telegram chatbots [14, 17]. Enforcement came late, peaking only before the second round in the presidential elections, while many recipients lived in the Transnistrian region, beyond the reach of Moldovan authorities [10]. An important and rapid progress in curbing electoral corruption followed by adopting Law No. 100/2025 that closed the main legal gaps. The law extended the offense of vote-buying to include the promise of benefits, raised the maximum penalty to 6 years, and to 15 years in aggravated cases, and set deadlines of 6 months for investigations, 4 months for trials and 2 months for appeals in electoral corruption cases [18, 19]. Furthermore, enforcement changed as well, so that in 2025 investigations started months earlier, arrests came in the final days of the campaign, and police issued more than 30,000 citations for passive electoral corruption, with total fines above €4.78 million [20, 21]. The Șor network adapted by moving part of its payments to crypto-assets and a dedicated app [22]. In an attempt to address this issue, in August 2026 Moldovan authorities adopted a new law on crypto-assets market, but it will only enter into force from March 2027 [23].

Proxy parties. After the Constitutional Court banned the Șor Party in 2023 finding that its non-transparent financing was systematic, continuous and significant in scale, and considering evidence of foreign-state involvement and its implications for Moldova's sovereignty and independence [24], the Șor network tried to return to Moldovan political scene through new parties and blocs. The Laws No. 100/2025 and No. 130/2025 prohibited successor parties, introduced the notion of "camouflaged electoral blocs" and allowed courts to restrict a party's activity for up to 12 months in cases involving serious harm to political pluralism or fundamental democratic principles, with an expedited route to judicial intervention where the conduct concerned threatens sovereignty, independence, territorial integrity, national security or the constitutional order [18]. On this basis, the CEC refused to register Șor's "Pobeda / Victory" bloc in July 2025, excluded the "Heart of Moldova" party shortly before the voting day in parliamentary elections and the "Moldova Mare" party on election day [4].

Information space. During the 2022–2023 state of emergency, Moldova suspended the broadcasting licenses of 12 television stations through decisions of the Commission for Exceptional Situations, acting under its emergency powers to protect the national information space. The measures were justified by concerns including inaccurate coverage of domestic developments and Russia's war against Ukraine, opaque financing

and links to sanctioned individuals, as well as alleged involvement in disinformation activities affecting national security. [26]. However, malicious content migrated to social networks and messaging apps, where regulation remains limited [4]. In 2025, the Șor network shifted its weight from direct payments to voters, to untransparent paid online content [15]. A BBC reporter infiltrated a Telegram-run network paying recruits about \$170 a month to post against governing party PAS on TikTok and Facebook [15], and Romanian Expert Forum tracked 100 inauthentic TikTok accounts that drew 13.9 million views in a single month [27]. Several hundred priests received paid trips to Moscow and were asked to set up parish Telegram channels, which then spread near-identical anti-EU content [16]. Moldova's legal tools reach licensed broadcasters, while online platforms apply their own policies [28]. In 2026, the CEC launched an interinstitutional process to develop proposals for amending the Electoral Code and related legislation, focusing on transparency of online political and electoral advertising, third-party campaigning, institutional responsibilities and cooperation with digital platforms. The initiative follows the Constitutional Court's 2025 call to strengthen safeguards for electoral integrity online – as first attempt to regulate this space directly [29].

Infrastructure of the vote. Around election day in 2025, DDoS attacks hit the CEC website and government systems, bomb threats disrupted polling stations abroad and bridges

used by voters from the Transnistrian region, and police detained 74 people over an alleged Russia-coordinated plot to stage riots [8, 4, 30]. Cyber defenses held, and voting, counting and tabulation continued without systemic disruption [4]. The attacks were designed to create friction and incidents that could later be presented as evidence of fraud [4].

Considering these developments, several conclusions can be emphasized.

- **First**, each foreign interference channel that Moldovan authorities closed, pushed the hybrid operations into the next least regulated one: from bank transfers to crypto-assets, from television to TikTok and Telegram, from registered parties to informal networks and independent camouflaged candidates.
- **Second**, the timing of measures undertaken by the authorities has decided their effectiveness. Enforcement that peaked between the 2 rounds in 2024 came somewhat late, while early investigations in 2025 signaled to voters that selling a vote carried real penalties which appears to have reduced their willingness to accept offers. [10, 20].
- **Third**, the defense measures undertaken by the authorities also carried legitimacy costs, since the rapid legal changes and last-minute exclusions of candidates gave critics grounds to question the fairness of the process [8]. With Russia's 2025 spending estimated at €200-300 million, about 2-3% of Moldova's GDP [20], Moscow has shown it is willing to invest heavily in the next electoral cycles too.

3. Remaining gaps

The 2025 elections showed that Moldova can defend an election when a whole of society approach is applied and when inter-institutional cooperation works, but this also involved significant support from Western partners and a lot of ad-hoc experimenting. The remaining gaps concern institutionalization of some tactics that proved efficient in safeguarding elections integrity previously, and reaching the channels where the reforms are pending, most of them in the online space.

Platform jurisdiction. Moldovan media and campaign rules apply only to platforms with a legal presence in the country, which Meta, Google and TikTok do not have [28], and the EU's Digital Services Act does not cover candidate countries. Cooperation therefore depends on the platforms' goodwill. Ahead of the 2025 elections, TikTok removed over 4,500 pieces of electoral misinformation, while Telegram, the main channel used to recruit and pay voters in both cycles, did not respond to requests from Moldovan authorities [31].

Third parties and influencers. Elections observers have flagged third-party campaigning as underregulated since 2023, and the recommendations on third-party financing remained unaddressed after the 2025 elections [24, 32]. Most of the 2025 online operations ran through this channel. The CEC's draft rules (September 2026) would address it, but they are still at the consultation stage, leaving very little

time before the 2027 local elections for their application.

Crypto-assets. The crypto-asset law (Law No. 180/2026) enters into force on March 17, 2027. It assigns supervision to the National Commission for Financial Markets and the National Bank, which may share information with law enforcement, the Office for Prevention and Fight against Money Laundering, and the Security and Intelligence Service, but it makes no reference to the CEC or to political financing [23]. Foreign exchanges and peer-to-peer conversion, both used in the schemes linked to Șor, remain largely out of reach [22].

Coordination between elections. The 2025 response worked because institutions coordinated early. That coordination still follows the electoral calendar and relies on ad hoc structures such as the CEC working group set up in June 2026 [33], while paid networks, recruitment on Telegram and cyber probing continue between elections [4].

Due process, public trust and legitimacy of protective measures. The 2025 electoral cycle marked an important shift in Moldova's approach to electoral security. Faced with a much clearer understanding of the scale and methods of foreign interference, the authorities relied more extensively on preventive and early-response measures, rather than intervening primarily after violations had already materialized. Earlier investigations and enforcement, tighter controls on illicit political finance, restrictions targeting proxy political structures, stronger cyber

defenses and closer inter-institutional coordination reflected a determination to prevent identified threats from affecting the election rather than merely responding to their consequences [8, 20, 34].

At the same time, this more proactive approach also created a different kind of vulnerability. Protecting an election against fast-moving and adaptive threats can require decisions within compressed timeframes, while some measures, including restrictions affecting political contestants, media or access to information, may limit rights and freedoms and therefore require particularly strong procedural safeguards. In 2025, ODIHR noted that frequent legal changes close to the elections affected legal certainty and that decisions declaring two parties ineligible shortly before election day limited their ability to obtain an effective remedy [8, 34]. These circumstances provided additional material for Russia-backed actors and other critics to portray electoral-

security measures as censorship political exclusion or institutional abuse.

This challenge is especially important in a political environment where trust in public institutions is already uneven, and disinformation operations deliberately seek to deepen existing societal divisions. The effectiveness of electoral-security measures therefore depends not only on whether they disrupt illicit interference, but also on whether the reasons, evidence and procedures behind them are sufficiently clear, predictable and open to timely review.

Institutionalizing the more proactive approach developed in 2025 should consequently go together with clearer legal thresholds, stronger procedural guarantees, timely judicial remedies, and transparent public communication. This would reduce the space in which legitimate security measures can themselves be repurposed into narratives aimed at weakening confidence in democratic institutions.

4. Recommendations: towards security-minded electoral integrity

Moldova is still faced with permanent hybrid threats to elections through rules and institutions that mobilize mainly around election periods. With local elections in 2027, a presidential election in 2028 and parliamentary elections in 2029, there is little time between cycles which in itself presents additional risks.

First, Moldova should build on the work already initiated by the CEC's

interinstitutional working group on transparency and integrity of electoral campaigning in the digital environment. The proposals emerging from this process should be further developed through broad consultation and, where legislative amendments are required, considered by Parliament sufficiently ahead of the 2027 local elections to ensure legal certainty and adequate time for implementation. The new framework should increase transparency of

online political advertising, third-party campaigning, and other forms of paid or coordinated electoral promotion, while maintaining clear safeguards for legitimate political expression. In parallel, the CEC should be provided with the permanent technical and human capacity needed to implement the new rules, monitor digital campaigning, maintain the transparency mechanisms ultimately established by the legislation, and cooperate systematically with digital platforms between electoral periods.

Second, political-finance oversight should cover crypto-assets. Once the crypto-asset law is in force, the CEC, the Office for Prevention and Fight against Money Laundering and the National Bank should share data on transactions linked to political actors, and campaign finance rules should explicitly cover crypto donations and payments. Flows outside Moldova require cooperation with foreign exchanges and EU financial intelligence units.

Third, electoral security should become a permanent inter-institutional function. Cooperation between the CEC, the Security and Intelligence Service, the financial intelligence unit, the cybersecurity service, the police, anti-corruption prosecutors and the StratCom Center should continue between elections, with a legal mandate, a shared risk assessment and regular joint exercises. Security institutions should monitor illicit financial flows and foreign digital operations throughout the electoral cycle, while the CEC keeps the lead on electoral administration, and the courts keep

oversight of any restrictive measure.

Fourth, the EU should extend platform accountability to candidate countries. Through the accession process, it should apply to Moldova the obligations it imposes on very large platforms under the Digital Services Act, starting with election periods: a legal representative, a Moldova-specific political ad library, fixed deadlines for responding to electoral authorities and data access for researchers. Telegram's lack of response should be raised at EU level, since the same channels reach voters in member states.

Fifth, Western partners should treat support for electoral integrity as security assistance. Funding for the CEC, cyber defense, financial intelligence, independent media and civil society costs little compared with military aid and serves the same objective: a Moldova at peace, able to choose independently its own course. The EU could consider maintaining sustained support to Moldovan institutions in addressing cyber, financial and information-related electoral risks across the electoral cycles leading up to 2029, building on the cooperation developed in 2025 [20].

Finally, societal resilience requires sustained investment in independent, and non-partisan civil society. Professional civil society organizations, independent media and election observers play an important role not only in identifying manipulation and electoral misconduct, but also in strengthening public trust, facilitating dialogue, supporting informed participation and

providing civic and electoral education, particularly in communities most exposed to disinformation, political polarization or electoral corruption. Their ability to act credibly and independently should therefore be supported on a long-term basis rather than only during electoral periods. At the same time, public confidence in electoral security measures depends on how they are designed and implemented. Measures adopted by state institutions should be transparent, based on clearly communicated risks, proportionate to the threats they seek to address, and carefully balanced against the protection of political pluralism and

fundamental freedoms.

Stronger cooperation and dialogue between public institutions, civil society and affected communities can help ensure that necessary protective measures reinforce, rather than undermine, trust in democratic institutions.

A credible election held under heavy foreign interference gives the elected government a clear mandate to pursue its course and shows citizens and partners that Moldova's institutions are worth investing in. Moldova cannot defend elections in campaign mode against threats that operate in permanent mode.

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