



**GLOBAL
INITIATIVE**
AGAINST TRANSNATIONAL
ORGANIZED CRIME

CAUGHT IN TRANSIT

CORRUPTION AND ORGANIZED
CRIME IN MOLDOVA

Liam O'Shea

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EXECUTIVE SUMMARY

Moldova has long been regarded as a centre of organized crime, a reputation that the war in Ukraine has exacerbated since Russia's 2022 full-scale invasion, with President Maia Sandu warning in March 2026 that the conflict is amplifying the risks from arms, drugs and human trafficking.¹

This report finds that Moldova is not a major centre of organized crime in its own right and that its domestic criminal markets are small, but that the country is significant as a route for criminal trades that operate from and through Ukraine towards the European Union (EU). That significance varies from market to market. It has been greatest for the smuggling of cigarettes into the EU, which probably remains the largest of these trades even if its volume may be diminishing.² Moldova is also a route for smuggling conscription age men out of Ukraine,³ a trade the war created, but trafficking of women and girls has declined.⁴ Moldova's place in the regional synthetic drug trade is growing, but it is a minor route for heroin and cocaine.⁵ The anticipated outflow of arms from Ukraine has not materialized.⁶

Domestically, the most common criminal actors in Moldova are small and loosely structured networks.⁷ More structured regional and international groups organize and finance larger cross-border trades, with Moldovan criminal actors generally providing supporting roles to them. Moldova is exposed to financial and cyber crime, mainly as a target and base for fraud, while it also serves as a conduit for illicit flows tied to political financing.



The complexion of Moldova's criminal markets is determined by three main factors. First, its location and several facilitating conditions provide illicit actors access to markets in the EU. The price and excise gap between Moldova, Ukraine to the east and the EU makes carrying goods westwards profitable and weak border controls facilitate illicit trade.

Moldovan President Maia Sandu has warned that the war in Ukraine is amplifying the risks from arms, drugs and human trafficking. © Artur Widak/NurPhoto via Getty Images

Many Moldovans and Moldovan companies also have ready access to the EU coming through dual Moldovan–Romanian citizenship and light company registration requirements, both of which are useful to criminal networks organized abroad.⁸

Transnistria, a pro-Russian breakaway region that Moldova does not control, remains a vulnerability, although its significance as a criminal hub has declined as its economy has contracted,⁹ Russian support has diminished and the Moldovan government has brought many of its firms under Moldovan regulation as a condition of access to EU markets. Second, the war in Ukraine has reshaped illicit trades by closing some routes, opening others and creating the new market in conscript smuggling. Third, the current government has not fully reformed Moldova's police, border and the customs service, which lack capacity and remain vulnerable to corruption.

The current government has, however, played a central role in constraining criminal activity, as well as corruption, primarily through its reforms to address state capture. For most of the 35 years since gaining independence in 1991, Moldova has been beset by recurring state capture, in which ruling elites subordinated state institutions to their own interests.¹⁰ This entrenched corruption produced an enabling environment for organized crime: the bodies meant to contain it were left weak and often complicit, while criminal figures obtained protection from the politicians and officials they dealt with.¹¹ Since 2021, however, a government headed by the Party of Action and Solidarity (PAS) has led the deepest recovery from state capture in Moldova's modern history.

This has been facilitated by the prosecution of senior figures from earlier administrations – among them a former president and a former prime minister – the vetting of judges and prosecutors, a revival of anti-corruption bodies and tighter controls on political finance.¹² Centralized state capture of the kind that defined the 2010s no longer exists. The recovery has also narrowed the enabling environment on which organized crime relied: criminal actors no longer obtain political protection, no evidence has surfaced since 2021 of collaboration between senior political figures and organized crime, and the state constrains these markets more effectively than at any point in the post-Soviet period.

Though far-reaching, the recovery from state capture is incomplete. Corruption persists in public procurement, local administration and state enterprises,¹³ remaining common in everyday dealings with the state. Allegations covered by local media in 2026¹⁴ established that corruption risks persist in the central state, even if pivotal figures are not themselves corrupt. The means used to pursue the reforms have drawn criticism, from the concentration of executive power used to drive them through to a pattern of enforcement that has fallen more heavily on the government's opponents.¹⁵ Transnistria lies outside the recovery. It has its own form of state capture, in which the interests of its de facto authorities and business interests that dominate its economy remain both fused and involved in illicit activity.

Gains against state capture and organized crime both rest on the same recovery and are exposed to three principal risks – an excessive reliance on executive power and absence of institutionalization, which means that the reforms could be easily reversed by a successor government; structural economic weaknesses that unavoidably entrench poverty and informality; and external risks. The most obvious external risk is the potential for an influx of arms through poorly controlled borders and onwards into the EU upon any eventual end to the war in Ukraine. Mitigating these risks and sustaining the recovery depend on further institutionalizing measures against corruption and organized crime, on checks and balances that constrain executive power and on the political choices of the current government and any successor, especially whether they hold themselves to the rules the reforms are meant to establish.

Methodology

This report is a qualitative assessment, applying political economy and criminal market analysis to the structures that shape the opportunities for, and the constraints on, corruption and organized crime in Moldova. The research was conducted between February and July 2026. It combined desk research across academic literature, grey literature from international organizations and non-governmental bodies, investigative media reporting and court records with fieldwork carried out in Moldova in March 2026. The fieldwork comprised interviews with civil society representatives, investigative journalists, academics, officials, prosecutors, police and Western diplomats.

Since high-level corruption, state capture and organized crime are by their nature concealed, the analysis triangulates across these source types rather than relying on just one. Corruption and state capture are assessed on the basis of perception and experience surveys, documented cases and the qualitative record. Organized crime is analyzed through documented media and court cases, existing analysis and data specific to particular markets, such as drug consumption surveys, harm reduction data and industry studies of the cigarette trade.

The evidence base on organized crime in Moldova is thin and the scale of its criminal markets cannot be measured reliably. The report's findings on the markets are therefore framed in relative and structural terms, centring on the direction of a trade, its shape and Moldova's place within it.

Recommendations

The report's recommendations follow from these findings; in brief, they are as follows.

For the Moldovan government:

- Build a common, evidence-based assessment of organized crime threats, centring on how those threats could change and setting priorities as part of this assessment.
- Extend reforms to the police and border and customs services, addressing both the low capacity of these institutions and – more importantly – the persistent corruption within them.
- Strengthen the oversight and sanctioning of officials who exercise discretion over tenders, permits, licences and appointments.
- Treat the extension of Moldovan regulation over Transnistria's economy as a deliberate instrument against illicit activity in Transnistria, not only a trade and fiscal one.
- Exercise restraint in the use of executive and emergency powers and anchor the reforms in institutions and oversight that do not depend on a continuation of political will.

For external partners:

- Sustain support against corruption and organized crime, directed at closing the capacity and integrity gaps in anti-corruption bodies, the courts and the police, border and customs services, and in the parts of the government administration the reforms have yet to affect.
- Extend this support to parliament, journalists and civil society groups that hold the government to account.
- Leverage the EU accession process to secure the political conditions on which continued recovery depends, above all restraint in the government's use of executive and emergency powers and the entrenchment of the reforms against reversal by a successor.



STATE CAPTURE AND THE ENABLING ENVIRONMENT

Three factors have driven recurring patterns of state capture in Moldova and, with it, an enabling environment for organized crime. The first driver was the conduct of domestic political actors. Ruling elites subordinated state institutions, key economic sectors and the media to their own political and economic interests, and this produced the enabling environment in which organized crime operated. Corruption in the police and customs facilitated smuggling, officials protected the criminal figures they did business with, and criminal actors and money entered politics.¹⁶

The second driver of state capture was structural. Post-Soviet patterns of informal governance and a poor, remittance-dependent economy made control of the state valuable and left it vulnerable to state capture, sustaining the informality that blurs the line between business, politics and crime.¹⁷ The third driver was external. Russia reinforced state capture through its backing of the Transnistrian authorities, who ran extensive smuggling operations out of the region, and through oligarch-controlled banks that channelled Russian-linked capital.¹⁸ The EU and other Western donors exerted pressure for anti-corruption reforms but there was little genuine political will in support of them.¹⁹

The PAS government, elected in 2021, has reversed the first driver of state capture and weakened the third. It has prosecuted high-level corruption, restructured and vetted the judiciary, activated anti-corruption institutions, and narrowed the channels through which foreign and illicit money reached Moldovan politics. In doing so it broke the centralized state capture that had also protected criminal figures.



Vladimir Plahotniuc, a powerful oligarch and political operator, was sentenced at first instance to 19 years in prison in April 2026.
© Daniel Mihailescu/AFP via Getty Images

STATE CAPTURE AND RECOVERY IN MOLDOVA, 1991–2026



Categorizing corruption

The report uses several terms in specific senses. It distinguishes three levels of corruption by how far each has become institutionalized: 1) petty corruption, the routine bribery and small-scale abuse of office met at the point of service delivery; 2) high-level corruption, the manipulation of laws, policy and regulation by political and economic elites to serve particular interests; and 3) state capture, the systematic subordination of formal institutions to informal networks, allowing elites to shape rules and resources for private gain while preserving an appearance of legitimacy. State capture may also involve sustained collaboration between political and criminal actors, the former extending the latter protection, which blurs the line between the state and organized crime. That blurring is one source of what the report calls the enabling environment for organized crime: the surrounding conditions that allow such crime to operate embedded in the same institutions and commerce as legitimate activity, rather than as a separate underworld.²⁰ ■

Drivers of state capture and organized crime

Domestic political actors' role in state capture

Since independence in 1991, the conduct of domestic political actors has been the main driver of state capture in Moldova. The transition that followed was characterized by simultaneous democratization, marketization and state-building, which opened opportunities for state capture that the new state had little capacity to check. It also brought a short war between right-bank Moldova and Transnistria, a strip of territory on the left-bank of the Dniester River that stretches to the border with Ukraine.²¹ A secessionist administration took hold in Transnistria that remains in place today.²² The status of Gagauzia, a region in southern Moldova, was settled by negotiation rather than conflict, giving the Turkic, Orthodox Christian Gagauz autonomy under a 1994 statute, although relations with Chişinău have remained tense since.²³ By the late 1990s Moldova had a captured state, but a diffuse one, its institutions and resources contested among competing groups rather than held by a single network.²⁴ Organized crime in this period was small-scale and localized, turning on protection rackets rather than transnational operations.²⁵

A more personalist and consolidated form of state capture took shape between 2001 and 2009 under Vladimir Voronin and the Party of Communists, as a new generation of oligarchs, Vladimir Plahotniuc among them, first built their wealth through ties to the presidential family.²⁶ Alongside this, Voronin's government broke up the smaller criminal groups, but fewer and better-connected ones consolidated, dealing mainly in the trafficking of women and drugs and, in some cases, operating under political and patronage protection.²⁷ An independent media and civil society nonetheless survived these years, and helped drive a democratic recovery in 2009, when the repression of protests prompted defections from the Communists and snap elections that ended their rule. Those elections brought a four-party pro-European coalition, the Alliance for European Integration, to power.²⁸

But the recovery proved short-lived. Between 2009 and 2019 an even more consolidated form of state capture emerged, centred on oligarchic networks inside the governing parties, and the Alliance for European Integration delivered only limited anti-corruption reform, largely under the pressure of EU conditionality.²⁹ Plahotniuc was central to the consolidation of state capture. He used his position

as vice-chair, and, from December 2016, chairman of the Democratic Party to exert control over prosecutorial and media institutions and turn them against his rivals. By 2016 he had monopolized most of the state through appointments, his media holdings and the defection of lawmakers to his party, which observers attributed to blackmail and bribery.³⁰ In 2018 the European Parliament described Moldova as a state captured by oligarchic interests.³¹

This system collapsed the following year, when the February 2019 elections cost the Democratic Party its governing majority and Plahotniuc could not hold a coalition together; he reportedly fled the country in June 2019.³² Parties that had campaigned on European integration and anti-corruption came to office in stages after that. Maia Sandu won the presidency in 2020 and the PAS won an outright parliamentary majority in July 2021, giving them executive, legislative and presidential power together for the first time.³³ Transnistria, meanwhile, had by 2019 settled into a relatively stable form of state capture in its own right.

Entrenchment of informality

Beyond the actions of individual elite figures, recurrent state capture after independence was also underpinned by entrenched informal governance, itself driven by structural economic conditions. Both pre-date the PAS government and persist under it. Informality has deep roots. Reliance on personal connections, patronage and informal favours, rooted in the Soviet system,³⁴ carried over after independence, when ineffective regulation, weak property rights and reduced state capacity left a vacuum that predatory elites, organized crime and businesspeople filled, the boundaries between them often blurred.³⁵

Structural economic conditions sustained these informal practices. Moldova emerged from the Soviet collapse among the poorest states in Europe and has remained so, its growth after 2000 resting on remittances and consumption rather than investment or productivity and leaving it small, undiversified and dependent on the earnings of citizens abroad.³⁶ Formal economic opportunity was scarce, and much of what existed was allocated through the state, so personal connections and informal networks counted for a great deal in doing business and getting ahead, and control of the state offered the best access to resources. In this setting corruption became endemic in business and in everyday dealings with the state, and Moldova has ranked among the more corrupt states in Transparency International's index since it first appeared there in 2001.³⁷

External actors' impact

Russia has reinforced domestic patterns of state capture, whilst Western powers have broadly acted as a constraint. Russia's political, economic and security backing of the Transnistrian authorities has sustained the secessionist authorities.³⁸ Through the 2000s and 2010s, banks controlled by oligarchs in successive governing coalitions moved large volumes of Russian-linked capital, much of it illicit, giving Moscow informal access to the political and economic system.³⁹ This backing also fostered an enabling environment for organized crime. Transnistria, beyond the reach of the Moldovan government's customs authorities, served as a route through which cigarettes and other untaxed goods could be channelled into Moldova, Ukraine and the EU, and as a conduit for human trafficking.⁴⁰ Western governments and the EU integration process have by contrast generated pressure for governance and anti-corruption reform,⁴¹ but that pressure was applied unevenly and inconsistently, securing only nominal gains, with little genuine political support in Moldova for reform even as oligarchic control deepened.⁴²

Russia has stepped up its interference since 2022, much of it running through the network of Ilan Șor, a fugitive Moldovan businessman and politician now based in Russia. Moldovan authorities allege that his network funded anti-government protests and a set of local parties in 2022 and 2023, before organizing large-scale vote-buying in the 2024 presidential election and a referendum on enshrining the goal of EU accession in Moldova's constitution.⁴³ Gagauzia has been a particular focus of this effort. Its governor, Evghenia Guțul, elected in 2023 on the Șor Party ticket, was convicted in August 2025 of channelling undeclared Russian funds to the party between 2019 and 2022 and of knowingly receiving money from an organized criminal group (a sentence she is appealing).⁴⁴ Russia has also directed sustained cyber operations at Moldovan institutions. The EU's engagement deepened over the same period, with Moldova granted candidate status in June 2022, ahead of accession negotiations opening in June 2024.⁴⁵

'Theft of the century': State capture and bank fraud

The clearest illustration of state capture facilitating illicit activity in Moldova is a major bank fraud that came to light in 2015. Between 2012 and 2014 a network linked to Șor took control of three commercial banks, including the country's largest, and drained them through bogus loans to connected companies, routing the proceeds offshore until the banks collapsed and the National Bank of Moldova placed them in receivership.⁴⁶ Around US\$1 billion was lost. The scheme relied on neutralizing regulatory institutions. Șor's network divided ownership of the banks across offshore entities and nominee holders, each below the 5% threshold that would have triggered National Bank approval, thus avoiding regulatory scrutiny.⁴⁷ Warnings were suppressed and those behind the scheme enjoyed political protection.⁴⁸ Known locally as the 'theft of the century', this episode demonstrates the mechanics of a captured state, its financial and regulatory machinery turned to the extraction of public resources on a national scale. ■

State capture also produced an enabling environment for the criminal groups operating in Moldova's smuggling and trafficking markets. It undermined the institutions that should have contained it. The police, the prosecution and the courts were poorly resourced, corrupt and among those captured elites bought under their control, which left the state poorly placed to act against organized crime. Police and customs officials were involved in smuggling, and the scale of the cigarette trade in particular depended on their collaboration.⁴⁹ Even the second most senior official in the prosecution service interfered in a case against a crime boss, and was convicted for it. In 2013, the First Deputy Prosecutor General, Andrei Pântea, ordered the criminal case against Grigore Caramalac, wanted in Moldova since 1999, to be transferred to Russia, which had repeatedly refused to extradite him and had granted him citizenship. The Russian authorities closed the case in 2015, which meant that Caramalac could return to Moldova without facing prosecution. Pântea later admitted ordering the transfer, was convicted of interference in the administration of justice, sentenced to two years' imprisonment and released immediately under an amnesty.⁵⁰

Most consequentially, criminal and political elites collaborated directly, in business and in politics, across successive governments. Caramalac claimed to have helped finance a presidential campaign in 1996 and, with a US\$500 000 cash contribution, the Communists' parliamentary campaign in 2001.⁵¹ Constantin Țuțu, who had reported links to organized crime and a long-standing personal relationship with Plahotniuc, was elected as a Democratic Party member of parliament in 2014 while on trial for hooliganism over a 2012 shooting in which a man was killed.⁵² There is limited evidence of political elites dominating key criminal markets, but these cases highlight criminal money reaching the campaigns of successive governing parties and a criminal associate of the era's dominant oligarch holding a parliamentary seat while awaiting trial for murder, all substantive evidence of close and recurrent collaboration between political and criminal elites.

In 2021 the PAS government thus inherited a captured state and the environment for organized crime that came with it. Its programme, examined below, set out to dismantle state capture and, in doing so, it constrained the environment for organized crime.

Reforms and the narrowing of the enabling environment

The prosecution of officials and politicians from earlier administrations has been a key element of the PAS government's efforts to tackle state capture. Significant cases came from 2023 onwards. Plahotniuc, who had left Moldova in 2019, was extradited from Greece in September 2025 and convicted in Chișinău in April 2026 of fraud, money laundering and of creating and leading the criminal group behind the bank fraud outlined (see box - 'Theft of the century': State capture and bank fraud). He was sentenced to a prison term of 19 years in the first instance. He maintains his innocence, and both he and the prosecution have appealed.⁵³ Șor, convicted in absentia in the same case, had his sentence increased to 15 years in April 2023, although he remains in Russia.⁵⁴ Between January 2023 and early 2024 the National Anti-Corruption Centre and the Anti-Corruption Prosecution Office submitted more than 140 corruption cases to court, implicating a former president, a former prime minister and a former minister, four current and former members of parliament, three prosecutors, a judge and a former governor of the National Bank of Moldova. The prosecution office obtained 130 convictions and sentences at the first instance court over the same period.⁵⁵

The cases were slow, however, and their pace has been a recurring source of frustration. The European Commission found no significant progress on high-level cases in 2023, and corruption cases have taken three and a half years on average to reach a final decision, four times longer than criminal cases generally.⁵⁶ Much of the obstruction came from the courts, from compromised judges embedded in the hierarchies and the vested interests of the previous decade.⁵⁷ The prosecutions have nonetheless curtailed the capacity of individuals tied to the oligarchic networks to shape policy, block anti-corruption work and undermine institutions.⁵⁸

Judicial reform, driven by the PAS government's anti-corruption mandate and by EU accession conditionality,⁵⁹ tackled closed professional networks in the judiciary and prosecution service which had carried over from the oligarchic period, through which political interests had shaped appointments, promotions and cases. The reforms changed the composition of the bodies that govern the two professions, the Superior Council of Magistracy and the Superior Council of Prosecutors, and established a vetting programme to assess the ethical and financial integrity of those holding or seeking judicial and prosecutorial office.⁶⁰ Three commissions, each combining Moldovan members with international



In 2025, Marina Tauber (left), a former Şor Party lawmaker, was convicted in absentia of accepting illegal party financing from an organized criminal group. © Elena Covalenco/AFP via Getty Images

personnel nominated by development partners, screened candidates for the reconstituted judicial and prosecutorial councils from 2022 onwards, sitting Supreme Court judges from mid-2023 and senior judges and chief prosecutors from 2024 (the latter process is still underway).⁶¹ Turnover was substantial. Twenty of the 25 sitting Supreme Court judges resigned before evaluation began. Only a third of the candidates for the two councils passed pre-vetting and by November 2025 half of those examined at appeal court level had resigned or withdrawn.⁶²

The process has prompted substantiated criticism and the operational effect of the significant turnover will not be clear for some years. Civil society interviewees also questioned the speed of the process, the frequency of mid-process amendments, aspects of due process and the political independence of some commissioners.⁶³ However, international evaluations have been broadly positive. More reform-minded interviewees regarded vetting as a substantive break with the system it replaced⁶⁴ and the reforms as a marked break from the oligarchic period.⁶⁵

The PAS government has enabled the once dysfunctional anti-corruption architecture it inherited to function, by amending the laws governing its institutions, replacing key personnel and redrawing their competencies. The National Anti-Corruption Centre investigates corruption offences, the Anti-Corruption Prosecution Office prosecutes high-level cases and the National Integrity Authority verifies the asset and interest declarations of officials.⁶⁶ The government pushed through a wave of amendments to the laws governing the prosecution service and the two anti-corruption bodies in 2021 and 2022,⁶⁷ and suspended the Prosecutor General in October 2021.⁶⁸ In August 2022 a donor-supervised international panel selected a new chief prosecutor for the Anti-Corruption Prosecution Office⁶⁹ and a redrawing of competencies in 2023 concentrated that office on high-level corruption, moving systemic and petty cases to the National Anti-Corruption Centre and district prosecution offices.⁷⁰

Overall, the changes strengthened the anti-corruption architecture's compliance with international standards. The International Monetary Fund noted in 2024 that most of its priority anti-corruption and anti-money-laundering recommendations had been implemented.⁷¹ A 2025 evaluation by the

Organisation for Economic Co-operation and Development (OECD) found improvement in seven of the nine areas it assessed, but not in enforcement against corruption offences or the performance of specialized anti-corruption bodies.⁷² Donors and civil society have raised questions about whether the architecture is operationally robust and politically insulated (these points are discussed below).⁷³ The architecture that earlier administrations had undermined is nonetheless being used against high-level corruption.

The PAS government also acted to close the channels through which illicit and foreign money entered Moldovan politics, tightening the law on political finance and electoral conduct. A new Electoral Code took effect in January 2023 and amendments to the law on party financing – extended by further measures through to 2025 – lowered the ceilings on cash donations, restricted charitable and sponsorship activity by parties, raised the penalties for voters who accept payment and widened the powers of the courts, the Ministry of Justice and the Central Electoral Commission to sanction or de-register parties.⁷⁴ The government applied these measures against the Şor network. The Constitutional Court declared the Şor Party unconstitutional in June 2023 and its successor parties were de-registered or barred from later elections,⁷⁵ while the Anti-Corruption Prosecution Office separately announced the seizure of around 1.36 billion Moldovan lei (about US\$75 million) of Şor-linked assets in April 2023.⁷⁶

These measures narrowed channels for electoral interference but did not close them, as illustrated by vote-buying around the presidential election and EU referendum that were held simultaneously in October 2024. In the weeks before the referendum, police and prosecutors announced that some 130 000 citizens had received a total of US\$15 million, routed through accounts at a sanctioned Russian bank, to vote against EU membership or to persuade others to do so, and courts have since convicted some of those involved.⁷⁷ But although the scheme the authorities described constitutes large-scale evasion of the rules governing party finance and elections, those rules are nevertheless considerably tighter than those they replaced.

Centralized state capture of the kind that defined the previous decade no longer exists in Moldova. The reforms set out above were directed at the networks that sustained state capture and at the institutions those networks had neutralized. No comparable structure has since replaced those networks. No serving minister or member of parliament has been shown to have enriched themselves from public funds⁷⁸ and no allegation against a serving central government figure has emerged without the authorities acting on it. Moldova's investigative journalists are active and capable, and both they and the government's political opponents have the incentive to find such cases, but interviewees at the time of fieldwork reported that no such case had come to light.⁷⁹ Allegations that surfaced in mid-2026 have reopened the question of whether corruption at the centre was absent or had gone undetected, which the next subsection examines. But nothing established to date approaches the systematic extraction of public resources that defined elite political conduct in earlier periods.

The PAS government has also added directly to the powers the state can use against organized crime. Parts of that architecture were already in place, built up from the mid-2000s and aligned in large part with EU standards, but the institutions responsible for applying it were among those state capture had subordinated, as described above.⁸⁰ The measures introduced since Moldova gained EU candidate status in June 2022 have broadened asset recovery and anti-money laundering powers, deepened operational cooperation with EU justice and home affairs agencies, and tightened border and customs controls.⁸¹ The programme has continued into 2026, with a National Anti-Drug

Strategy for 2026 to 2032 announced in late 2025 alongside draft legislation raising sentences for drug trafficking and ending anonymous postal delivery.⁸² These measures have contributed to the PAS government narrowing the enabling environment for organized crime, but the main factor has been the termination of state capture. The judicial and prosecutorial reforms broke up networks through which protection for illicit activity had operated. There is still evidence of complicity among officials and corruption continues to be documented in the police, the border and the customs services, which we examine in the final section of this report ('Limits of the state's response to organized crime').

Limits of the recovery from state capture

Breaking centralized state capture has not ended corruption in Moldova, nor the practices that sustain it. Additionally, the means the current government has used to pursue reforms have drawn criticism.

The most serious allegations to undermine the PAS government concern appointments and pay at MoldATSA, the state air navigation enterprise. In June 2026 investigative journalists reported that its director had been appointed on false credentials, the Public Property Agency which supervises the company admitted it had not verified them and it became clear that salaries there had risen to several times the national average.⁸³ Among those reportedly recruited without competition and on pay well above her stated basic salary was a cousin of President Sandu who was at the same time advising the State Chancellery.⁸⁴ The director of MoldATSA was dismissed, the president's cousin and the head of the Public Property Agency resigned and the National Anti-Corruption Centre opened a criminal investigation into alleged abuse of office, reporting irregular bonuses and further hiring without public competition.

'Breaking centralized state capture has not ended corruption in Moldova.'

The Public Property Agency also audited pay practices at other state enterprises and parliament established a committee on the management of state-owned companies.⁸⁵ Radu Marian, the PAS member of parliament who had recommended the director in question, resigned his chairmanship of parliament's economy, budget and finance committee, stating that he had played no part in the hiring process or in decisions on pay. Igor Grosu, the party leader and speaker of parliament, apologized for the party's handling of the case and his chief of staff – another cousin of the president and sister of the MoldATSA employee – also resigned. The president denied any involvement in the appointment and no evidence emerged that it was nepotistic.⁸⁶ Prime Minister Alexandru Munteanu resigned on 3 July, bringing down the government. He gave no explanation beyond saying he could no longer exercise his mandate in accordance with his principles. Commentators attributed the government's collapse to the accumulated pressure of the scandal alongside an unpopular tax reform.⁸⁷ On 21 July, parliament elected Vasile Tofan, nominated by the PAS, as prime minister by 53 votes to 21, with 21 abstentions.⁸⁸

The cases at least establish that corruption risks are present in the central state and particularly in state-owned enterprises. In July 2026, in a separate case, the National Anti-Corruption Centre detained a state secretary at the Ministry of Agriculture on suspicion of receiving money to influence a licensing decision.⁸⁹ On the available evidence, these cases do not point to corruption by central figures.⁹⁰ The alleged conduct also differs in scale and in kind from that of earlier administrations, particularly in comparison to the scale of public money stolen in the 2012–2014 bank fraud. Moreover,

the institutions that have responded to these recent incidents have acted as checks rather than as protective instruments of a corrupt network. On a sympathetic reading they show the limited reach of the reforms rather than corruption at the heart of government, with the government having concentrated its efforts on ministries, the courts and the anti-corruption bodies. The problems at MoldATSA appear to be attributable to unreformed patterns of governance in state-owned enterprises.⁹¹ On a more critical reading, these cases indicate patronage in appointments and the taking of payment for official decisions below ministerial level. While investigations are ongoing, the evidence does not firmly support either of these readings, and whether these incidents are symptomatic of something more systematic than isolated failures is not yet clear.

Limitations of reforms are also evident at a local level, where public decisions have favoured the relatives and business associates of officials, and where the rules on conflict of interest are applied unevenly. Moldova Curata documented in 2024 that a construction firm founded by the mayor of Costești and administered by his mother had won several procurement tenders from Costești town hall, before and after he became mayor in 2023.⁹² In one tender, the firm was the only bidder. In October 2025, shortly after the mayor was elected to parliament on a PAS ticket, the government designated another firm founded by his mother as the operator of an industrial park at Costești, on land the town hall had sold to another of her companies in 2022.⁹³ No integrity body has published a finding against this politician in these matters and he filed the integrity declarations the law requires. He has denied any impropriety. In another case, investigative journalists reported in December 2025 that a senior planning official in Chișinău Municipality had granted a developer initial approval for a residential project. The developer's administrator then sold a property to the official's wife on favourable terms a week later, and six months after that the official issued the construction permit for the project.⁹⁴ He had not declared the conflict of interest and the National Integrity Authority fined him.⁹⁵ Neither case indicates a connection to centralized networks of the kind found under earlier administrations, but both indicate weak constraints on conflicts of interest at the local level.

There is also evidence that the reforms have not stopped contracting authorities keeping public contracts out of open competition and, additionally, that the mechanisms meant to deter and correct this are weak. The PAS government largely inherited the existing procurement framework, which was adopted from 2015 under the EU-Moldova Association Agreement and includes the MTender electronic procurement system (the latter has been operational since 2018). The current government has worked to bring the rules closer to EU standards, with a new procurement law due in January 2027.⁹⁶ Donor evaluations judge the procurement framework broadly sound but criticize its implementation. In July 2025 the OECD raised Moldova's procurement integrity score but still assessed its performance as only medium, identifying weak deterrent sanctions by the Public Procurement Agency, ineffective application of the provisions excluding bidders for conflicts of interest and limited publication of procurement data.⁹⁷

Moldovan civil society groups are more critical. The Centre for the Analysis and Prevention of Corruption found that around 17% of the value of public procurement in 2024 was awarded directly, without publication on MTender. It also found that just over half of the procedures the Public Procurement Agency, the body that monitors compliance, had identified as irregular went unremedied by the central and local authorities that ran the tenders.⁹⁸ Where procedures do run through MTender, civil society monitoring between 2022 and 2024 identified recurring circumvention of open competition, including specifications written so restrictively that few or single bidders could meet them and the

artificial division of contracts to keep contract values below transparency thresholds.⁹⁹ No evidence has emerged of systemic procurement corruption under the PAS government, but avoidance of open competition is routine, and the sanctions and remedies meant to check it are weak.

Corruption across a range of interactions with the state remains high. The National Democratic Institute found in a 2025 survey that around 29% of respondents reported a bribe request in the previous 12 months. Across its 2023, 2024 and 2025 surveys, between 29% and 36% knew someone who had taken a bribe, which is around three times the average across the 27 EU member states.¹⁰⁰ The World Bank Enterprise Survey records the share of firms reporting at least one bribe in their dealings with state actors falling from 12% in 2019 to 7% in 2024,¹⁰¹ but the share reporting that they were expected to give gifts to obtain a construction permit rose from 22% to 32% over the same period.¹⁰² The same survey records 37% of firms as stating that they were competing against unregistered or informal firms in 2024.¹⁰³ Reliance on personal connections, patronage and informal favours has evidently persisted under the PAS government.

The reforms have also been criticized for the way the PAS government has pursued them – in particular, for the political use of justice and anti-corruption measures. The government does not appear to have shielded allies involved in corruption, although it is possible that relevant cases have never come to light. But NGOs report that the government's opponents have been investigated for corruption more often than its allies, and interviewees raised questions about selectivity.¹⁰⁴ Monitoring 58 high-profile criminal cases across 2023 and 2024,

Freedom House found that judges and prosecutors opposed to an influence group associated with the ruling party were investigated with extensive publicity, while prosecutors tried to conceal or give as little publicity as possible to investigations against those linked to the

group.¹⁰⁵ In 36 cases featuring a total 44 politically affiliated individuals, all 44 belonged to opposition or extra-parliamentary parties and none to the PAS.¹⁰⁶ The Centre for the Analysis and Prevention of Corruption also identifies a comparable asymmetry in the National Integrity Authority's wealth discrepancy procedures, where cases against parliamentarians have been opened either after their mandates ended or against opposition serving members; it concludes that the procedures may be perceived as selective and the inspectors' independence insufficient.¹⁰⁷ Whether this reflects deliberate selectivity or a reform drive directing limited resources towards investigating officials who served earlier administrations is difficult to establish; both readings found support among interviewees.¹⁰⁸

'Opportunities for corruption remain in Moldova. But centralized state capture is broken.'

Further concerns relate to the PAS government using its parliamentary majority to change rules that obstructed its reforms¹⁰⁹ and concentrating decision-making in the executive. It amended the law governing the vetting of Supreme Court judges seven times after adopting it in March 2023 and several of the amendments changed rules for evaluations already underway.¹¹⁰ In July 2023 it passed an interpretive law exempting international commission members from a political affiliation requirement that two appointees did not meet. In February 2026, when its nominee for an international seat on the prosecutorial vetting commission fell short of the three-fifths parliamentary majority the law required, it lowered the threshold to a simple majority and appointed the nominee eight days after the failed vote.¹¹¹ Days before the November 2023 local elections, the Commission for Exceptional Situations, an executive emergency body, cancelled the registration of every candidate nominated by the Șor-linked Șansa party. The Organization for Security and Co-operation in Europe (OSCE)

observation mission found that de-registration by executive decision lacked effective legal remedy¹¹² and the European Commission has noted that no effective parliamentary oversight of the Commission for Exceptional Situations has been established.¹¹³ In February 2025 the government tabled a bill to liquidate the Anti-Corruption Prosecution Office and the organized crime prosecutor's office and merge them into one body. The chief prosecutor at the Anti-Corruption Prosecution Office resigned the same day, calling the bill an attack on the justice system.¹¹⁴ The Venice Commission, which is the Council of Europe's advisory body on constitutional matters, found the merger to be unsupported by cost-benefit analysis and warned that it would disrupt ongoing investigations.¹¹⁵ The bill stalled but the episode raised questions about the independence of the bodies prosecuting high-level corruption.

Some of the government's methods may be explicable, given entrenched corruption, genuine security threats, limited capacity and the proportionality of security measures to those threats. But in utilizing such methods, the government has not held itself to the rules-based decision-making and oversight the reforms are meant to establish. The reforms rest on the command of executive and parliamentary power rather than on institutional constraint.

The cases set out above show that opportunities for corruption remain in Moldova. But centralized state capture is broken, and in breaking it the current government has narrowed the enabling environment for organized crime.

ORGANIZED CRIME IN MOLDOVA

Organized crime in Moldova has long been regarded as a serious problem and that reputation persists beyond the recovery from state capture described above. In March 2026 President Sandu warned that the war in Ukraine was amplifying the risks from arms, drugs and human trafficking, and that those risks could intensify once the conflict ends.¹¹⁶

This section offers a more circumspect assessment. Moldova's domestic criminal enterprise is small, and its significance centres on the country's status as a transit route. The largest criminal market has long been cigarette smuggling into the EU, and probably remains so, although the volume passing through Moldova may be declining.¹¹⁷ Moldova is also a significant route for the smuggling of people, especially now the smuggling of conscription-age men from Ukraine,¹¹⁸ a trade the war created even as the long-standing trafficking of women and girls has declined.¹¹⁹ Meanwhile, Moldova's place in the regional synthetic drug trade is growing though it is not a significant route for heroin or cocaine,¹²⁰ and the anticipated outflow of arms from Ukraine has not materialized.¹²¹



A border guard inspects luggage at a checkpoint on the Ukraine-Moldova border. Illicit flows are largely a function of the country's location as a transit route between eastern Europe and the EU. © Nina Liashonok/Ukrinform/Future Publishing via Getty Images

Moldovan criminal actors hold a correspondingly minor place within these chains, working in small and often single market networks rather than large or hierarchical groups, and appearing in operations that regional and international actors organize or finance.¹²² Moldova is also vulnerable to financial crime and cyber crime. These crimes consist mostly of fraud, with Moldova a target of it, a base for it and a conduit for illicit flows tied to political financing.¹²³

Three factors account for the current shape these markets take. The first is Moldova's geographical position and a set of facilitating conditions. The price and excise gap between Moldova and Ukraine and the higher-priced markets of the EU makes moving goods westwards profitable. Moldova's position on the tri-border with Romania and Ukraine is pivotal and weak border control leaves much of what crosses unchecked. Many Moldovan citizens hold, or can readily obtain, Romanian and therefore EU citizenship, which lets them move across the EU without routine checks and makes them useful to criminal networks. Companies can be registered in Moldova quickly and cheaply, a ploy external groups are reported to use to hold and conceal assets.¹²⁴ The second factor shaping these markets is the war in Ukraine, which created the trade in smuggling conscription-age men and redirected the flows in others. The third factor is the incompleteness of the government's reforms, which have not focused on the police, the border police and the customs service. These agencies are short of capacity and corruption persists within them, facilitating these criminal markets and weakening the response to them.

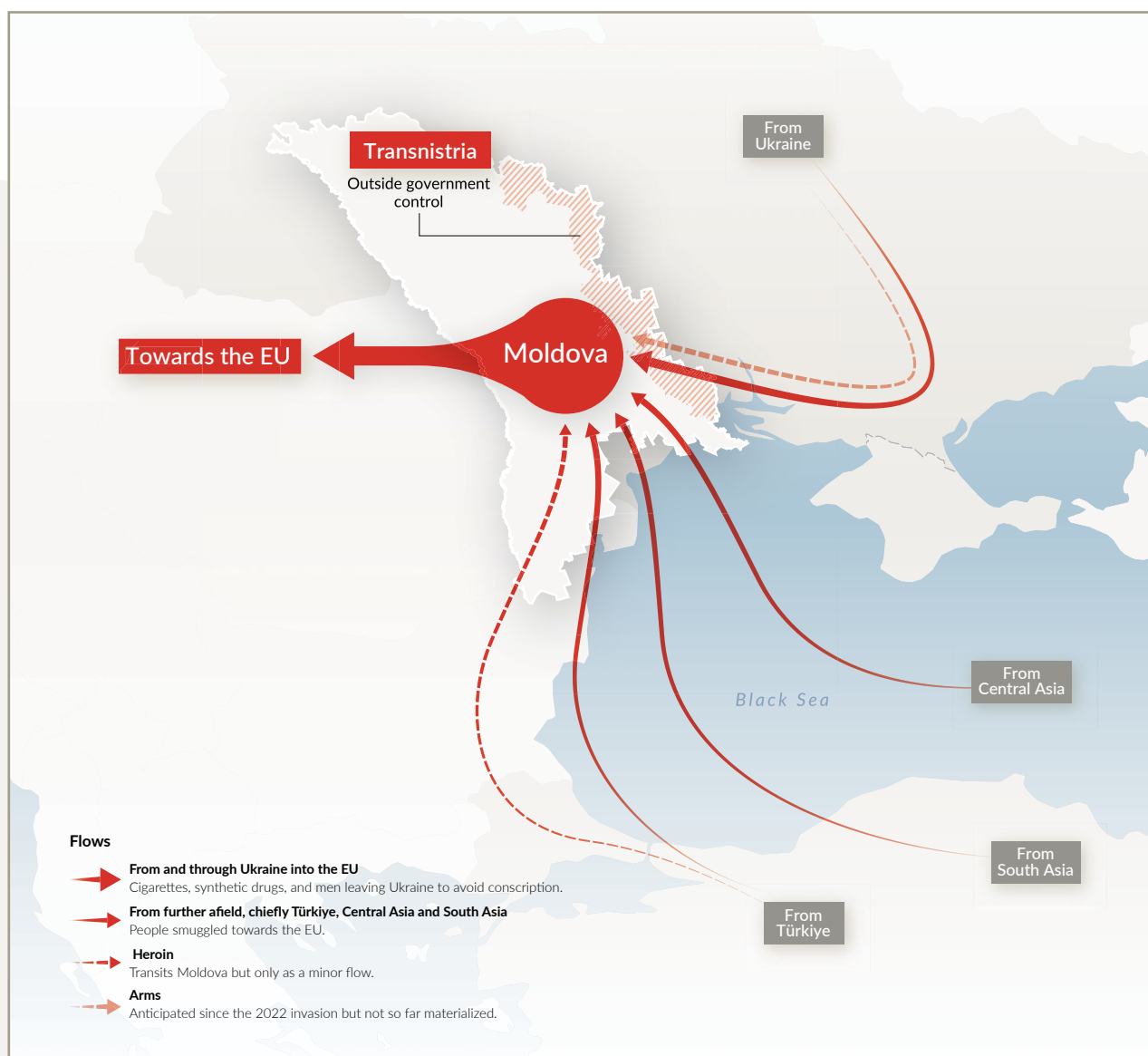


FIGURE 1 Illicit flow dynamics through Moldova.

Organized crime is less prominent than under earlier Moldovan administrations, and the state constrains it more effectively than at any point in the post-Soviet period, but there are still blind spots. Corruption in the security agencies is among the most serious of these and Moldova's government does not control the whole of its eastern frontier. That leaves Moldova – and in turn the EU – exposed.

Criminal markets

Cigarette smuggling



Cigarette smuggling towards Europe has long been Moldova's major criminal market.
© Gerard Bottino/SOPA Images/LightRocket via Getty Images

Cigarette smuggling from Moldova and Ukraine towards the higher-priced markets of Europe has long been Moldova's largest criminal market. Flows from Moldova and Ukraine run westwards into the EU, drawn by the price and excise gap.¹²⁵ This includes crossing official checkpoints, concealed in cargo or in vehicles with hidden compartments, as well as over the border with Romania along the Prut River at night. In 2024 Romanian authorities in Botoșani, a Romanian county bordering Moldova, broke up several interdependent groups that had smuggled cigarettes across the border since 2022, using concealed compartments, temporary storage and surveillance of police movements to avoid interception.¹²⁶ The supply from Moldova – along with from Belarus and Ukraine – has been dominated by 'illicit whites', low-priced cigarettes manufactured legally for domestic markets and smuggled to jurisdictions where they are not sold legally.¹²⁷ Moldova is a significant transit point on the route: a market research analysis published in January 2026 ranked it the second largest source of illicit cigarettes on the Romanian market, a gateway into the wider EU.¹²⁸

There are, however, indications that the volume of trade through Moldova may be diminishing. In 2019, most of the EU's illicit cigarettes came from beyond its borders and one in four came from Belarus, Moldova and Ukraine.¹²⁹ Before the war in Ukraine, much of the trade, too, was organized around imports into Transnistria.¹³⁰ But the overall pattern of the trade in illicit cigarettes appears to have shifted, and by 2023 the European Anti-Fraud Office estimated that up to 60% were produced inside the EU, as criminal networks moved operations closer to demand markets and to lower transport cost and risk, a shift the pandemic and then the war in Ukraine accelerated.¹³¹ The closure of the Transnistrian segment of the Ukrainian border in February 2022 further disrupted flows through Moldova, though the trade has proved responsive to conditions since, opening routes into Ukraine when much of that country's own tobacco production was destroyed.¹³²

Reliable data on the volume and trend of the illicit cigarette trade through Moldova is, however, difficult to obtain. Most estimates come from surveys funded by the tobacco industry, and these vary widely from year to year and from one survey to another.¹³³ The evidence nonetheless indicates that Moldova remains a transit route for illicit cigarettes into the EU, even if its role may be diminishing.

Alcohol and counterfeit goods

Alcohol and counterfeit goods are also smuggled, in smaller and less well documented trades. According to a 2022 report by the United Nations Interregional Crime and Justice Research Institute (UNICRI), illicit ethanol and spirits were, alongside tobacco, the principal generator of illicit income in Transnistria.¹³⁴ One long-running scheme brought molasses in from Ukraine, manufactured it into alcohol and moved it across the de facto border into right-bank Moldova, escaping excise on both sides.¹³⁵

Recent analysis and fieldwork interviews indicate that the trade has persisted since 2022. Industry-sourced reporting suggests that up to 40% of the alcohol served in Moldovan restaurants is illicit.¹³⁶ Differences in excise duty between Moldova and its neighbours make moving alcohol profitable. Duty rates change and the trade adapts quickly in scale and direction, but the differences themselves persist, as does weak control at the borders these goods cross.¹³⁷ Moldova has also been identified as a source and transit country for counterfeit clothing and medicines, as well as transit point for smuggled fuel, particularly towards Serbia.¹³⁸

Human trafficking and smuggling of migrants



Refugees from Ukraine crossing into Moldova at a checkpoint, March 2022. Fears that the influx would drive a surge in trafficking did not come to pass. © Gil Cohen-Magen/AFP via Getty Images

Moldova has long been associated with human trafficking, which has historically centred on the trafficking of women and girls for sexual exploitation. However, this form of trafficking has declined, a trend which began before the war in Ukraine. GRETA, the Council of Europe's anti-trafficking monitoring body, recorded 935 identified victims of trafficking between 2020 and 2024, compared

to 1 496 in 2015–2019, with the share of women and girls among them also falling.¹³⁹ These figures capture only part of the underlying exploitation, but the Moldovan authorities also record a decline, which they attribute to visa liberalization, awareness campaigns and closer international cooperation.¹⁴⁰ Several interviewees corroborated the trend.¹⁴¹ The war in Ukraine generated fears that the rapid influx of refugees would generate a surge in trafficking of women and girls, but this has not come to pass – identified and suspected cases have not risen significantly, despite the scale of displacement.¹⁴²

In recent years the composition of the trade has changed. The largest form of trafficking by some margin is the labour exploitation of Moldovan citizens abroad, mainly in construction, agriculture and manufacturing in France, Germany, Italy and Russia.¹⁴³ The second most significant theme is the exploitation of foreign workers brought into Moldova, including from Central Asia, South East Asia and Türkiye. Poverty and limited opportunity at home push Moldovans into exploitative labour abroad, and the emigration that follows leaves the shortages that draw foreign workers in. GI-TOC has been informed that two recent investigations centred on 42 individuals from Bangladesh and 11 individuals from India.¹⁴⁴ Men made up the majority of identified victims in 2024, while the shares of women and children have fallen substantially since the second half of the 2010s.¹⁴⁵

Although human trafficking is likely to have declined in scale, the war in Ukraine has created a new market in the smuggling of men seeking to avoid conscription. Operators previously involved in the ethanol trade moved into this new trade after February 2022, redeploying established smuggling capacity.¹⁴⁶ Referring to operators in Transnistria, one interviewee noted that ‘the people who used to smuggle spirits now smuggle people.’¹⁴⁷ In the first few months of the war UNICRI noted more than 2 500 illegal border crossings involving over 4 500 people, with fees ranging from US\$1 000 to US\$3 000 per person.¹⁴⁸ By 2025 investigative reporters found that fees for smuggling Ukrainians across the border ranged from US\$5 000 to US\$20 000 per person.¹⁴⁹ The main routes run directly between Ukraine and right-bank Moldova, with documented crossings concentrated in the south, in Ukrainian Bessarabia and near Odesa (Ukraine’s largest port, southern commercial centre and a long standing centre of organized crime).¹⁵⁰ A further route through Transnistria is lesser used.¹⁵¹

Moldova is also a transit point for a separate and longer-established trade, the smuggling of migrants from outside the region towards the EU. In 2022 a joint investigation team coordinated through Eurojust dismantled a network located on Moldovan territory that moved migrants of Arab and Turkish origin from Türkiye onward through Romania and Hungary towards Austria, concealed on coach services operating through Chişinău.¹⁵² Similar networks were uncovered in 2024 and 2025, the latter moving South Asian nationals across the Prut River from Moldova to Romania by inflatable boat at night.¹⁵³ This was corroborated in meetings with officials, who reported an increase in the number of cases involving individuals from Central Asia, Bangladesh, India and Pakistan in 2023 and 2024. Other reporting describes Moldova being used as a gateway to the EU for migrants from Asia and Africa, on routes running into Austria, Bulgaria, Greece, Hungary and Serbia.¹⁵⁴ These are established transit routes run largely from outside the country, where Moldova is a waypoint.

Moldova’s position as a transit country has also increased in terms of air travel. With Ukrainian airspace closed since 2022, more air traffic connected to Ukraine now routes through Chişinău.¹⁵⁵ By 2026 its airport served around 70 destinations, well above the number it served before Russia’s invasion of Ukraine, and stretching its capacity.¹⁵⁶ The airport has not been documented as a node in any specific criminal market, but its growth may widen opportunities for the trafficking and smuggling of people, according to officials in Chişinău.

Synthetic drugs

Moldova is a transit country for the growing regional trade in synthetic drugs and its domestic market for them is also growing. Limited synthetic drug production in Moldova has been documented since at least the late 2010s, oriented towards both domestic consumption and export to Ukraine and Russia.¹⁵⁷ Trade in synthetic drugs has expanded across the region in the 2020s, with production and consumption documented in Ukraine and onward trade into Romania and central Europe.¹⁵⁸

In 2022 UNICRI recorded attempts to relocate synthetic drug laboratories from Ukraine to Moldova,¹⁵⁹ but Moldova's place in the trade remains that of a transit country rather than a significant producer, its small size limiting domestic production and raising the likelihood of detection.¹⁶⁰ The European Union Border Assistance Mission to Moldova and Ukraine (EUBAM) reported a sharp increase in the trafficking of synthetic and psychotropic substances in 2023, in passenger vehicles and through postal shipments, and continued to flag this phenomenon in 2024.¹⁶¹ In February 2026 a joint Ukrainian, Polish and Moldovan operation supported by Europol dismantled 36 synthetic drug laboratories in Ukraine and Poland, with Moldova identified as a distribution destination for the network's products.¹⁶² In November 2025 a Eurojust-coordinated investigation found Moldovan members of a Romanian-Moldovan network supplied precursors and pseudoephedrine, both of which were moved through Romania to Czech laboratories that produced methamphetamine for the Czech and German markets. Sixteen suspects were detained in the Czech Republic, Hungary and Moldova.¹⁶³

Domestically, use of synthetic drugs is also rising, albeit from a low base and within an overall drugs market that remains small. Analysis of syringes collected from harm-reduction sites in Bălți, Moldova's third-largest city, in late 2021 found use of a broad range of synthetic drugs and key informants reported a fall in the use of heroin.¹⁶⁴ A senior police official reported that synthetic drugs now account for more than half of drug-related cases¹⁶⁵ and in 2025 the Ministry of the Interior also attributed an increase in drug-related crimes in part to growing use of synthetic drugs.¹⁶⁶ Distribution follows the pattern documented across Eurasian countries, relying on encrypted messaging applications, pre-arranged hiding places, cryptocurrency payments and postal parcels.¹⁶⁷

Heroin and cocaine

Heroin and cocaine transit through Moldova but do not constitute major flows. A 2020 assessment of organized crime in the Western Balkans listed it among the primary sites for heroin trans-shipment along the Balkan route, but more recent assessments describe the trade as smaller in scope.¹⁶⁸ Official seizure data fits the more modest picture. Heroin seizures reached 79 kilograms in 2018 and 218 kilograms in 2021, but only small fractions of those amounts in the intervening years.¹⁶⁹ A senior police official placed heroin low among the drugs trafficked through the country.¹⁷⁰

Even allowing for the limits of enforcement capacity, the overall pattern points to isolated large consignments rather than a sustained flow. Cocaine transit takes a similar form, a matter of occasional large consignments rather than a steady trade. In December 2025 Romanian authorities seized 252 kilograms of cocaine in transit from Colombia to Moldova.¹⁷¹ The low number of seizures elsewhere gives no sign that such consignments are routine. Domestic cocaine use is reported to be rising, albeit from a low level.¹⁷²

Arms trafficking

There is currently no evidence of significant arms trafficking in or through Moldova, but the scale of weaponry in Ukraine, and the weakness of Moldova's control over its own borders, has raised fears that this could change once the war ends. Moldova has long been associated with arms trafficking, but the documented scale has always been small. Before the war in Ukraine, concern centred on Transnistria and on fears that the de facto authorities were involved in or unable to control trafficking from the Soviet-era Cobasna depot, located in the north of this territory. A 2012 study found those claims rested on little verifiable evidence and the OSCE Mission to Moldova reported no evidence of weapons smuggling.¹⁷³ A 2018 study found firearms smuggling from Moldova to Romania to be exceptional¹⁷⁴ and EUBAM recorded low seizure volumes on the Moldova-Ukraine border from 2019 to 2021.¹⁷⁵

Since the outbreak of the war, evidence of increased flows has remained limited. A 2023 GI-TOC report found little evidence of weapons leaving Ukraine¹⁷⁶ and a 2024 report found no verified organized arms trafficking from Ukraine into the EU through 2023 and early 2024, amid little appetite among organized crime actors, including in Moldova, for entering a market less profitable and more exposed than established alternatives. One major reason the war has not fed the trade is that the scale of active fighting has absorbed the modern weaponry Ukraine has bought or been given; additionally, the Ukrainian military presence keeps the route through Transnistria closed.¹⁷⁷ Moldova's own trade is correspondingly small. Monitoring by the South Eastern and Eastern Europe Clearinghouse for the Control of Small Arms put the trade in Moldova at the lowest level among the seven countries this organization assessed in both 2022 and 2023, with 91 and 68 seizures respectively.¹⁷⁸

Despite the lack of evidence of current flows, Moldova faces vulnerabilities in relation to arms trafficking. Two Ukrainian court cases in 2026 are noteworthy. One case saw a Moldovan citizen convicted after he was stopped leaving Ukraine in his car with an undeclared drone – classed as military goods – and its control unit. The second case centred on a woman who posted a military-grade electromagnetic valve from Odesa to Chişinău, declared it as 'plumbing fittings'.¹⁷⁹ Both items were intercepted on the Ukrainian side of the border and involved relatively small, dual-use or component-level items rather than complete weapons, but they illustrate the movement of such material towards Moldova by private vehicle and by post.

A more concerning case came in November 2025, when Romanian customs intercepted a freight truck at the Leuşeni-Albiţa crossing carrying a consignment that was falsely declared as metal goods and bound for Israel through Romania. The cargo included a surface-to-air missile launcher, munitions and munition components, and a dismantled Geran-2 drone.¹⁸⁰ Whether the consignment was drawn from war stocks in Ukraine is disputed. Moldova's Prosecutor General's Office initially attributed it to an unidentified depot inside Ukraine,¹⁸¹ but investigative journalists found no evidence of a trace to Ukraine.¹⁸² Its origin aside, the case shows how readily military material can move through Moldova's crossings concealed in freight. That exposure is a concern because the wider conditions could change. Ukraine holds a large reservoir of arms – from Western military aid delivered during the war and from a substantial pre-existing stock – and demand for weapons persists in Europe. An end to the fighting could remove the wartime absorption now holding the trade down. Given Moldova's weak control over its borders, that could translate into a substantial increase in flows.¹⁸³ One interviewee, capturing the sense of latent threat, described the situation as 'waiting for the dam to break'.¹⁸⁴

Financial and cybercrime

Financial crime and cybercrime take a different form from the markets set out above. Those who commit such crimes exploit banks, payment systems, online platforms and cryptocurrency rather than transporting goods or people across the border, and they are largely different actors using different methods.

In recent years, financial crime recorded in Moldova has taken three forms: fraud against Moldovans, fraud committed from Moldovan territory against victims elsewhere and illicit cross-border flows tied to political financing. Cryptocurrency features in all three forms of crime. Fraud against Moldovans is the best documented aspect. The General Police Inspectorate registered around 60% more cases of online financial fraud in 2025 than in 2024 and the damage recorded roughly doubled, to around US\$15.5 million, most of it from false investment schemes marketed through fake online brokerages and cryptocurrency platforms.¹⁸⁵ Call centres operating from Moldovan territory defraud victims elsewhere. The third form of financial crime surfaced most clearly in March 2026, when the National Anti-Corruption Centre announced that it had identified a cryptocurrency wallet through which more than US\$107 million in stablecoins moved between 2023 and 2025, originating from platforms linked to a sanctioned Russian cryptocurrency exchange and converted into cash in Moldova. The funds were attributed to the Şor network's political financing operations.¹⁸⁶

Unlike earlier administrations, which used the institutions of the state to commit and conceal financial crime, the PAS government has strengthened the architecture for tackling it. Amendments to the anti-money laundering law in November 2024 tightened beneficial ownership transparency, a law in force since January 2025 has capped cash payments for larger transactions and pushed them through the regulated financial system, and a third law in March 2025 expanded the state's powers to seize and recover criminal assets.¹⁸⁷ In June 2025 the Council of Europe's Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) re-rated Moldova as compliant or largely compliant with 37 of the 40 Financial Action Task Force recommendations and it discontinued enhanced follow-up of Moldova's progress.¹⁸⁸ Virtual assets, which feature in all three forms of financial crime assessed here, represent one of the few categories where MONEYVAL still rates Moldova as only partially compliant.¹⁸⁹ Moldova's Criminal Asset Recovery Agency froze 330 assets worth around US\$75 million in 2024. The courts ordered the confiscation of more than US\$64 million in assets from Plahotniuc upon his conviction by the first instance court.¹⁹⁰ In 2025 Marina Tauber, a former Şor Party lawmaker, was convicted in absentia for accepting illegal party financing from an organized criminal group, and the court ordered the special confiscation of around US\$12 million tied to this offence.¹⁹¹

However, capacity constraints and institutional barriers persist. In 2025 the OECD found Moldova's enforcement to be weak on money laundering with a corruption predicate, on illicit enrichment and on the confiscation of corruption proceeds.¹⁹² The Anti-Corruption Prosecution Office filled only a handful of the 54 posts authorized in 2024, complex cases run for eight to ten years and less than 10% of the value of seizure orders were realized (against an EU average of around 50%).¹⁹³ Convictions for illicit enrichment remain almost absent, because the Constitution presumes assets to have been lawfully acquired, a bar the courts have been reluctant to test.¹⁹⁴

Cybercrime in Moldova has grown in recent years and consists mainly of the use of digital systems that are used to commit fraud rather than attacks on systems themselves. The exception is Russian attacks on Moldovan institutions which have been substantial but these serve political rather than

criminal ends.¹⁹⁵ The 2024 World Cybercrime Index ranked Moldova fifteenth among significant source countries for such crime, rating activity undertaken in Moldova as relatively technically proficient (indicating capability within the country and its use abroad).¹⁹⁶ Since 2024 Moldovan law enforcement agencies have dismantled several call centres which ran phishing operations that sought to obtain banking details from victims across the EU, fake investment and cryptocurrency-trading schemes and dating scams.¹⁹⁷ Proceeds were laundered through cryptocurrency, involving successive wallet transfers and conversions. Moldovans have also been defrauded through fake online brokerages and cryptocurrency platforms. The TUX platform, an unauthorized investment scheme, collapsed in late 2025, and law enforcement agencies unofficially estimate losses at more than €40 million.¹⁹⁸ One law enforcement interviewee reported that the number of illegal call centres operating in the country is rising, in part driven by the availability of IT and language skills in Moldova.¹⁹⁹

Moldova is also a source of cyber-dependent crime, consisting of attacks on computer systems. A 2021 UN report identified Moldova as a significant regional source of malware, while also citing Moldovan involvement in international operations against malware networks including the 2019 GozNym case.²⁰⁰ A four-person group operating from Moldova was investigated in 2020 for planning attacks capable of disrupting hospital IT systems.²⁰¹

The current government has built cyber capacity from a low base but gaps remain. Successive governments have directed their cyber efforts principally at defending against Russian attacks. A police cybercrime centre has existed since 2013, but the wider infrastructure was fragmented, and as late as 2022 four staff handled incidents targeting government systems.²⁰² A cybersecurity law adopted in 2023 and in force from January 2025 finally placed incident reporting obligations on operators of critical infrastructure and established an Agency for Cyber Security. Additionally, Moldova joined a regional cyber alliance with Ukraine and Romania in February 2026.²⁰³ Measures aimed specifically at tackling cybercrime are fewer, more recent and more directed at the public than facilitating investigations of this form of crime. Such measures include the establishment in September 2025 of a public facing platform for reporting cybercrime and a national campaign against fraudulent investment schemes launched in October the same year.²⁰⁴ The bodies responsible for tackling cybercrime remain under-resourced. They depend on donor programmes and third-party providers, which can slow their response, and they struggle to recruit and keep qualified staff, who find better paid work overseas or in the private sector - a concern emphasized during meetings with officials.²⁰⁵ The European Commission found in 2025 that Moldova's legal framework and institutional capacity for tackling cyber-enabled crime need strengthening. It also noted that the country still lacks a dedicated cybercrime strategy and that detection, traceability and prosecution all require greater effort.²⁰⁶

Criminal actors

Small and loosely structured Moldovan networks are the most common criminal actors in Moldova, while foreign and regional groups tend to organize and finance the larger cross-border trades. This division of labour is long established.

By the late 2010s Moldovan organized crime principally consisted of loose networks, some of them involving regional or foreign actors, rather than the hierarchical structures that had emerged at scale in Russia and Ukraine. These networks tend to have a stable core of organizers and collaborate with

a more fluid periphery of drivers, couriers and recruiters.²⁰⁷ A 2023 Ministry of Internal Affairs study found close to 89% of the criminal groups it identified to be loose or unstructured networks, while around 11% were classified as hierarchically organized with internal systems of control.²⁰⁸ Moldovan networks have been known to organize smaller trades themselves, as shown by a 2021 case in which a Moldovan organized network sold drugs into Moldova's and Ukraine's retail drug markets through Telegram.²⁰⁹

The foreign and transnational groups these networks connect into tend to be more structured and organized. Turkish-Kurdish networks have been reported to facilitate the modest volumes of heroin trafficked through Moldova.²¹⁰ In July 2024 İzzet Eren – reportedly the leader of a Turkish gang based in the United Kingdom involved in heroin trafficking – was killed in a Chişinău café, an incident which corroborates the involvement of sophisticated Turkish heroin networks in Moldova.²¹¹ Moldovan networks also connect into structures organized elsewhere in the region. A Ukrainian organizer led the synthetic drugs network dismantled in the February 2026 Europol-supported operation cited in the section above; this network also connected extensively into Polish criminal networks.²¹² In a November 2025 case, Romanian and Moldovan citizens supplied precursors to methamphetamine laboratories in the Czech Republic serving Czech and German markets.²¹³ In one case prosecuted in 2025, a people smuggling operation broken up in Timișoara in Romania was directed remotely by a Turkish organiser, with Moldovan students resident in the city recruited as drivers.²¹⁴

The difference in structure is clearest immediately across the border with Ukraine and differences extend beyond structure. In the Odesa region wartime security pressures have reduced the number of active criminal groups but those that remain are territorially entrenched and hierarchically organized, and they hold established relationships with local officials and political authorities. One group is reportedly led by Oleg Popescu, also known as 'the Romanian', and has been linked to extortion, alleged contract killings and the smuggling of cigarettes, cannabis and synthetic drugs. This group is also reported to control part of the conscript smuggling trade along the frontier with Moldova, with an adjoining stretch reported to be run by an ethnic Gagauz group based in Ukraine.²¹⁵ Moldovan criminal actors, by contrast, are neither as hierarchically structured nor embedded to the same extent in political or official structures.

A similar division between Moldovan participants and foreign organizers appears in fraud committed from Moldovan territory. The groups running the call centres uncovered in Moldova were of various nationalities, with Moldovans among them. However, a senior police official reported that Ukrainian nationals organized these operations and that the Moldovans employed in them were young people recruited for their technical and language skills.²¹⁶ A ready supply of skilled labour is what makes Moldova useful to the organizers of these operations.

There are two main reasons for this division of labour. First, the facilitating conditions set out above make Moldova useful to networks organized outside it. With Moldova's location, the price and excise gap and its weak borders making it an accessible route into the EU, the networks that run the larger trades tend to form elsewhere and draw on Moldovan nationals and companies for transport, personnel and cover. Many Moldovans hold, or can readily obtain, Romanian and therefore EU citizenship, and reports by Romanian border police identify this as a recurring facilitator of cross-border smuggling.²¹⁷ Moldovan companies, which can be registered quickly and cheaply, are used to hold and conceal assets moving towards Western Europe.²¹⁸

The second and more important reason for this division of labour is the diminishing ability of criminal actors to establish relationships with high-level politicians in Moldova. This has constrained the space in which larger and more hierarchical groups can operate. The trend began before 2021. Earlier

administrations suppressed criminal groups to a degree, breaking up the smaller ones in the 2000s²¹⁹ and, by the mid-2010s, placing the leaderships of thieves-in-law organizations (see paragraph below) in detention or under international warrant. However, suppression was selective and protection remained available to some criminal figures until the current government came to power and began to dismantle state capture. One interviewee, who was otherwise critical of the government's anti-corruption reforms, said that Moldova's criminal groups had mostly been connected to political factors, that this was no longer the case, and that the change was among the government's most significant achievements.²²⁰

Two further categories of actor are commonly associated with organized crime in Moldova – thieves-in-law (*vory v zakone*, in Russian),²²¹ alluded to briefly above, and criminal actors linked to the Russian state, but neither is prominent in government-controlled territory. Hierarchical crime groups have never been as entrenched in Moldova as in other parts of the former Soviet Union,²²² but in the first decade of the 2000s and the 2010s thieves-in-law led the few that existed in Moldova. The best documented of these groups were the Makena organization under Vladimir Moscalciuc, which preyed on prisoners and their families,²²³ and the larger Patron organization under Ion Gușan, which Romanian and Moldovan law enforcement have described as specializing in human trafficking, cigarette smuggling, racketeering and contract killing.²²⁴ Both groups' activities have been curtailed following the detention or pursuit of their leaderships,²²⁵ although the Patron organization continued to operate until at least 2023. In 2022 authorities in France, Romania and Moldova undertook an operation against a group of Moldovans suspected of theft and cigarette trafficking, allegedly led by Gușan, and in 2023 the organization was linked to the extortion of a released prisoner in Moldova.²²⁶ After being briefly detained in Romania in May 2022, Gușan evaded arrest until February 2026, when he was arrested in London on a French warrant. A French court had convicted him in absentia in May 2025 of offences including racketeering, smuggling, money laundering and membership of an organized criminal group, and sentenced him to ten years. As of February 2026, he was in British custody and contesting his extradition to France.²²⁷

Since then, evidence of hierarchical criminal groups has surfaced only in isolated cases. In 2026, for instance, a man was charged with running a prison-based criminal organization on behalf of a *vor* (thief) known as Kitaets, raising funds through extortion, contraband and illicit gambling across several prisons, in an echo of the Makena model.²²⁸ Such cases, however, reflect the prosecution of individuals tied to the thieves' diminishing world rather than the persistence of large or pervasive networks.

Criminal actors working with the Russian state pose a security threat but do not play a prominent role in organized crime in Moldova. Grigore Caramalac, discussed earlier and reportedly a thief-in-law, is the clearest connection, but he has operated from Moscow since the late 1990s and is better understood through his role in political destabilization rather than criminal markets in Moldova.²²⁹ His influence also appears to be narrow. Caramalac runs a foundation that sponsors what are presented as charitable events in occupied Ukraine and northern Moldova, while promoting pro-Kremlin narratives.²³⁰ In May 2023 the EU sanctioned him for supporting actions that threaten Ukraine's territorial integrity, at the same time as it sanctioned Șor and Plahotniuc.²³¹ However, compared to the operational scale and political reach of the Șor network, Caramalac's contribution to Russia's pressure on Moldova is marginal. Another case was revealed in October 2024 when Moldova's security service detained a group of young Moldovans recruited through the Șor network and who had been trained in destabilization tactics at camps in Bosnia and Serbia by instructors linked to the Wagner Group.²³² In early 2026 Ukrainian authorities arrested several young men, including two from Gagauzia, in connection with a Russia-coordinated plot to assassinate prominent Ukrainians.²³³ In April 2026 four Moldovan men, some with previous drug convictions in Moldova and all recruited online, were convicted in Ukraine

of setting fire to railway infrastructure and military vehicles as part of a Russian-coordinated sabotage campaign. Comparable cases have continued to surface²³⁴ but they typically involve the Russian state recruiting individuals to serve its political ends rather than collaborating with established Moldovan criminal organizations or networks.

In summary, criminal actors now operate largely apart from political power in government-controlled Moldova. Transnistria is an exception. There, the de facto authorities and associated business interests remain complicit in illicit activity.

Transnistria

Since the 1990s and 2000s, Transnistria has often been cast as a major hub for smuggling, trafficking and arms dealing,²³⁵ but its significance in Moldova's criminal markets is considerably smaller than its reputation implies. Behind this lies a long-term decline in Transnistria's economy: economic contraction, Russia's reduced capacity to sustain the region and the extension of Moldovan regulation over Transnistrian commerce have all shrunk the base on which illicit trades operated. The closure of the Ukrainian frontier in 2022 sharpened that decline, shutting down the channel the main smuggling trades relied on. The region is nonetheless the one part of Moldova where political authority and illicit activity remain joined. As noted earlier, Transnistria had settled by 2019 into a form of state capture in its own right – and one that survives Chişinău's termination of political protection for criminal actors.



FIGURE 2 Smugglers exploited the de facto breakaway region of Transnistria because of its position on the Ukrainian border and the inability of Moldovan customs to exert control, until the border closed in 2022.

Political and economic activity in Transnistria have effectively merged together since the 1990s and the boundary between licit and illicit commerce is correspondingly blurred. The de facto administration built parallel state institutions after the 1992 war and Sheriff – a conglomerate founded by former state security officers – came to dominate the regional economy, holding near-monopolies across retail, fuel, telecommunications, banking and media by the middle of the first decade of the 2000s.²³⁶ This conglomerate is now fused with the de facto state, controlling the legislature through its party, Obnovlenie (Renewal), and aligned with the region's de facto president, Vadim Krasnoselsky. A second (albeit less visible) centre of power sits in the breakaway region's security apparatus, which is linked to Russia's Federalnaya Sluzhba Bezopasnosti (Federal Security Service, known as the FSB).²³⁷ Smuggling trades are intricately linked to the de facto authorities, with Sheriff especially playing a dominant role in the cigarette trade.²³⁸

What made the region useful to smugglers was its position on the Ukrainian border and the inability of Moldovan customs to exert control. Goods entered without Moldovan duty and left untaxed to Moldova, Ukraine and the EU. Both the Ukrainian frontier and the internal line with right-bank Moldovan territory were lightly guarded. Cigarettes and illicit ethanol and spirits accounted for most of Transnistria's documented smuggling before the war, but these trades depended on goods being able to cross the Ukrainian frontier. Ukraine's closure and fortification of that frontier in 2022 removed the channel both trades relied on. The war also gave rise to the smuggling of conscription-age men out of Ukraine. In 2024 Ukrainian border guards identified the frontier between Ukraine and Transnistria as the segment organizers of the smuggling of conscription aged men most often used.²³⁹ Those who cross are systematically interrogated by Transnistria's Ministry of State Security, headed since 2017 by a former Russian FSB border-troops officer, about Ukrainian military deployments and equipment, and Ukrainian border officials assess that information is likely passed to the FSB.²⁴⁰ That Transnistria's security service processes the trade's clients is the clearest evidence that the trade operates with the authorities' permission. However, a regional expert assessed in 2026 that the main channel for the smuggling of Ukrainian men of conscription age is directly into right-bank Moldova, avoiding the difficulties of transiting Transnistria.²⁴¹

Transnistria's importance as a hub for illicit activity has, however, been in decline for reasons that go beyond Ukraine's closure of its border. The territory's economy has contracted over a long period and sharply since 2024. Its population fell from around 706 000 in 1990 to around 475 000 in 2015, due to sustained emigration, low fertility and an ageing population.²⁴² An energy crisis in 2024 and 2025, which saw Russia stop providing heavily subsidized gas to Transnistrian industry, compounded the economic decline. The breakaway region's own data records an 18% fall in gross domestic product in 2025.²⁴³ Moscow's interest in sustaining Transnistria – and its capacity to do so – has also declined, especially since the start of the war in Ukraine. What remains is a small, energy-intensive economy dependent on access to outside markets, with exports of only around US\$400 million in 2023 against US\$700 million in 2021.²⁴⁴ Because commerce and political authority in Transnistria are fused, this contraction has narrowed the base on which both licit and illicit trades depend. Before 2019 Transnistria had also been identified as a base for cryptocurrency mining run by Russian-linked investors, since the heavily subsidized gas made it a cheap place to mine,²⁴⁵ but even this advantage has now gone with the termination of subsidized gas.

The Chişinău government's extension of its regulatory reach across Transnistria's economy has also altered incentives for businesses that operate there. One interviewee noted that smuggling had decreased due to this trend, though partly through reclassification rather than reduction because

some goods that were previously recorded as smuggled now go through formal channels,²⁴⁶ with duties duly paid to the authorities in Chişinău. The PAS government extended the regulatory framework in 2024 by enforcing a 2021 customs code that ended a 1997 provision exempting Transnistrian firms from Moldovan export and import duties.²⁴⁷ In April 2026 Moldova's parliament adopted a law phasing out the remaining value added tax and excise exemptions by 2030.²⁴⁸ Together with Transnistria's deepening trade orientation towards the EU, which absorbed 71% of its exports in 2025, this has made EU market access for a large share of Transnistrian firms contingent on Moldovan regulation.²⁴⁹ By December 2025, 2 478 Transnistrian-registered firms were operating within Moldova's regulatory framework.²⁵⁰

As more Transnistrian firms find their market access depends on complying with Moldovan and EU rules, the balance of commercial activity is also shifting away from actors whose power rests on energy rents and on Sheriff's near-monopolies. Sheriff's own incentives may be shifting with it, since cigarettes are only one part of a conglomerate that dominates as much as 60% to 70% of Transnistria's economy and whose other business now depends on that same access.²⁵¹ It would be premature to conclude that Sheriff's interests – still less the interests of the wider leadership – are realigning towards Chişinău and the EU, since economic incentives are one factor among several. But the space available for illicit activity does appear to be narrowing.

Transnistria nonetheless remains an enabling environment for organized crime and a continuing vulnerability for Moldova. It remains a territory the Chişinău government does not fully control, including a key stretch of the Ukraine border. Moldovan authorities cannot fully regulate firms in Transnistria.²⁵² More importantly, the de facto state and Sheriff remain fused, and both retain the capacity to resist transparency and to facilitate sophisticated illicit activity. Transnistria's illicit economy has diminished but, unlike in right-bank Moldova, the political arrangements which sustain it are largely in place. Its decline is therefore due to external conditions rather than any change in how the territory is governed.



LIMITS OF THE STATE'S RESPONSE TO ORGANIZED CRIME

Under the PAS government, the state has tightened its constraints on organized crime, mainly through its reforms against state capture rather than through measures aimed at tackling organized crime directly. But these constraints are subject to important limitations.

The first of these is capacity shortages in the police, the border police and the customs service and working practices inherited from the Soviet and oligarchic periods. Turnover across the interior ministry, the police and the border police is high. Interviewees attributed this to low pay, with officers leaving for the private sector once trained.²⁵³ The European Commission recorded a similar finding in 2025, when it assessed intelligence-led policing capacity to be thin.²⁵⁴ Capacity gaps are not confined to the police and border agencies. Interviewees pointed to a judicial system that struggles to manage its caseload²⁵⁵ and in 2025 the European Commission noted that Moldova had yet to build a track record of final convictions in complex organized crime cases.²⁵⁶ The reforms under the PAS government have had a limited impact on hierarchical and informal institutional cultures within key official bodies. The customs service, for example, retains a bureaucratic culture in which information is kept 'strictly secret' within institutional hierarchies and one 2024 comparative study of policing found that Moldovan civil society experts saw 'few changes in the police's mentality' despite repeated reform efforts.²⁵⁷

The government also lacks a common approach to organized crime across its agencies. It has adopted sectoral strategies, but a Western donor official working with the police and the border agencies identified the absence of a common approach across law enforcement and government. This source also stated that priorities tend to be earmarked on the basis of opinion rather than evidence, alongside a working assumption that 'everything is a priority'.²⁵⁸

Corruption within those same agencies also remains a serious vulnerability. A 2025 National Democratic Institute survey found that, among the 980 respondents who had dealings with state institutions, 5.2% had been asked for a bribe by the police, 3.1% by customs, 1.8% by the courts and 1.3% by prosecutors.²⁵⁹ Several specific cases likewise point to collusion between officials and criminal actors. In early 2022 14 people were put on trial in connection with a seizure of contraband cigarettes at Cahul the previous summer, including three border police guards (one of whom was a former acting head of the Cahul sector, while a second was the former head of the Inspectorate's Southern Regional

Directorate).²⁶⁰ In August 2022 a shift manager at the Vulcănești-Vinogradovka crossing point was investigated for falsifying border crossing data to enable around 50 Ukrainian citizens to enter the country illegally in return for payment.²⁶¹ In June 2024 four officials were detained on suspicion of taking bribes to delete or block Interpol Red Notices issued for the arrest of international fugitives.²⁶² The above cases remain unproven and nothing indicates that such collusion is organized or protected from above.

Overall, though levels of corruption are lower than under previous administrations,²⁶³ the survey responses and cases above highlight the state's limited ability to constrain organized crime. The government's reforms have not addressed this vulnerability, which is also sustained by low pay. As one government official noted, border police salaries of €700 per month leave officers exposed to corruption, making the country's borders especially vulnerable to corruption.²⁶⁴ The state's ability to constrain criminal markets is further restricted by its lack of control over Transnistria and the 452 kilometres of frontier with Ukraine that run through it. This has been exacerbated by the closure of EUBAM on 30 November 2025, which ended two decades of external scrutiny of the border between Moldova and Ukraine.



CONCLUSION AND RECOMMENDATIONS

The PAS government has led the most extensive recovery from state capture in Moldova since independence. Earlier administrations had also adopted anti-corruption reforms, but under external pressure and with little political will behind them, and they secured only nominal gains. This recovery has been driven domestically. The government prosecuted senior figures from earlier administrations, restructured the judiciary and vetted its judges and prosecutors, made the anti-corruption bodies function and tightened the rules on political finance, dismantling the networks that had sustained state capture. Although aimed at state capture rather than organized crime, these reforms also narrowed the enabling environment in which organized crime operates, since they broke up the channels through which criminal actors had obtained protection from officials.

But the recovery is exposed to three main risks. The first is that it rests on the government's own political will and its continuation in power, leaving it open to reversal by a successor. The recovery from state capture depends above all on the longevity of a single reformist camp. The PAS has governed since 2021, but its electoral appeal has declined, largely because of its weak economic record. GDP growth over the 2021–2025 parliamentary term was slow.²⁶⁵ The 2024–2025 energy crisis also increased the cost of living when Russia stopped supplying gas to Transnistria, as right-bank Moldova lost much of the cheap electricity it had bought from the region.²⁶⁶ The October 2024 constitutional referendum on EU membership received a vote in favour of 50.38%, with this narrow margin down to diaspora votes.²⁶⁷ The September 2025 legislative elections resulted in a reduction in PAS's parliamentary majority.²⁶⁸ The collapse of the government in July 2026, under pressure from the allegations set out above and an unpopular tax reform, showed how little political capital the reforms are able to rely on. A declining majority is even more worrying in the absence of an alternative reformist bloc. Several of the leading figures in the largest opposition bloc have documented financing ties to Moscow.²⁶⁹ Beyond that bloc, the opposition fragments into small parties whose realignments and re-brandings are a recurrent feature of post-Soviet Moldovan politics.²⁷⁰ Even those parties who claim to support the European project and associated reforms often do so opportunistically.²⁷¹ Russia will also continue to work against any reform-minded government. Together, these conditions present the risk of a 'Georgia scenario'. The Georgian government of 2003 to 2013 delivered far-reaching anti-corruption reforms without comparable gains in living standards, against a backdrop of Russian hostility, before losing office to a successor under which state capture returned.²⁷²

The manner in which the PAS government has pursued reforms heightens this political risk. It concentrated decision-making in the executive, altered rules that obstructed the reforms, used emergency powers to de-register political candidates days before an election and sought to merge the offices prosecuting corruption and organized crime. Some of these tools would be available to any government with a parliamentary majority, but their use has set a precedent that decisions of this kind can be taken without effective remedy or parliamentary oversight. A less reform-minded successor would inherit the mechanisms and the precedent, utilizing them to reverse the reforms. In Georgia the same executive instruments passed to a successor that used them to consolidate state capture.²⁷³ The over-reliance on executive power is a major factor in the reforms not being institutionalized. Interviewees argue that the government has promoted loyalty rather than integrity.²⁷⁴

The second risk is structural, since economic conditions sustain informal practices that no government can alter quickly, and the structural economic conditions that left Moldova vulnerable to state capture are still in place. The country remains among the poorest in Europe, with GDP growth reliant on remittances and consumption rather than investment. Moldova's labour market is shrinking due to emigration and its informal sector remains large.²⁷⁵ This sustains a reliance on personal connections and informal favours in parts of the state untouched by the reforms, keeping open the conditions in which state capture could return (and with it the protection criminal actors once obtained from officials). Addressing these structural constraints is the work of long-term economic development rather than anti-corruption reform alone, and is beyond the horizon of any single administration.

The third risk is that the state lacks the capacity to meet any surge in illicit flows, with the risk of arms trafficking the most visible. Any eventual peace settlement could result in an enormous surplus of arms in Ukraine and actors with an established smuggling architecture through Moldova may find European arms markets worth supplying. This would place stress on police and border institutions, which are already affected by persistent working-level corruption and whose capacity is both low and overly-reliant on donor funding. The state manages the current illicit flows of goods, but it has not been tested by larger flows. While arms constitute the most identifiable future risk, the same reasoning applies wherever a change abroad alters what is worth moving through the country. Capacity to deal with such flows takes years to assemble and cannot be improvised quickly, meaning it has to be built in advance, even while acknowledging resource constraints.

Moldova has nevertheless built much of the architecture it needs against corruption and organized crime, and the government retains the ability to close the capacity and integrity gaps that persist in the agencies and parts of the administration its reforms have not reached. The harder task is to institutionalize the reforms and bind any future government, by writing them into rules a parliamentary majority cannot easily alter by itself and by securing the independence of the bodies that enforce them.

Recommendations

Several policy recommendations follow from this report's findings.

For the Moldovan government

Build a common, evidence-based assessment of the organized crime threats, and set priorities from it. At present the government lacks a strategic, evidence-based approach to the problem. Any such assessment should be built from case records, agencies' own data and other sources, and be directed at how the threats could change rather than only at those now present. This is the work of foresight analysis, examining the political, economic and security factors that affect organized crime. For a state with limited resources the aim would be to develop a strategic perspective of threats rather than an exhaustive or precise one, accurate enough to rank the threats and direct capacity accordingly. This work cannot yield firm predictions, but it can identify which changes may place the greatest strain on the state's capacity, and allow it to prepare for them rather than react once they have occurred.

Extend reforms to the police, the border police and the customs service. The government has limited ability to constrain the illicit trades which are organized and financed abroad, and whilst cooperation through joint investigation teams remains an important means available to it, strengthening the domestic response is the more effective way to limit these flows. That entails addressing both low capacity and persistent corruption in those agencies. Whilst Moldova faces resource challenges – and the government's focus on reforming the courts, the prosecution service and anti-corruption bodies was necessary to address state capture – addressing organized crime requires a broadening of the reforms. Corruption is the more urgent of the two problems, as it directly creates opportunities for criminal actors to influence policing. Addressing it would mean strengthening the agencies' own ability to identify and monitor corruption risks, raising pay to the point where officers are less at risk of engaging in corruption, and extending vetting.

Strengthen the oversight and sanctioning of officials who exercise discretion over tenders, permits, licences and appointments. Significant corruption risks that remain are higher-level and surround those decisions, particularly in public procurement, sub-national administration and the state enterprises. Moldova's anti-corruption frameworks are broadly sound and meet international standards, and though some gaps remain, a major shortfall is in enforcement. Sanctions do not deter, conflict-of-interest rules are applied unevenly and contracting authorities leave identified irregularities uncorrected. Closing that gap depends chiefly on the capacity and resourcing of the bodies that apply the rules, and on their ability to verify what officials declare. It also depends on cases reaching a conclusion. Complex corruption cases can run for eight to ten years and the state ends up with less than 10% of the value of the assets it seizes during investigations,²⁷⁶ so the prospect of sanction carries little weight. Addressing that would mean staffing the anti-corruption prosecution service adequately, developing judicial capacity to see complex cases through to a successful conclusion and making fuller use of asset recovery powers the state already holds.

Treat the extension of Moldovan regulation over Transnistria's economy as a deliberate instrument for reducing illicit activity in this territory, and not only as a trade and fiscal tool. Transnistria's illicit economy has been shrinking mostly for reasons the Chişinău government does not control, while the political arrangements that sustained that illicit commerce remain in place. What Chişinău does control is regulation. By making access to the EU market depend on compliance with Moldovan rules, it has drawn a large share of Transnistrian firms into its framework and moved much of their trade from

evasion to compliance. This will not end illicit activity in and through the region, but it may achieve more than enforcement can, because it alters the balance of cost and reward for those engaged in it. Pursuing the extension deliberately would mean judging measures directed at Transnistria by their effect on those incentives. It would also mean the trade, customs and law enforcement arms of government adhering to a single assessment of what the extension of regulation seeks to achieve.

Exercise restraint in the use of executive and emergency powers, and anchor the reforms in institutions and oversight that are not overly-reliant on continuing political will. A more rule-based approach would mean carrying contested decisions through ordinary legislative process rather than emergency instruments and remedying adverse findings through the courts rather than legislating around them. That is difficult in a polarized political environment and amid continuing Russian interference, but those conditions are also why institutionalizing the reforms is important. The priority is to develop the independence of the judiciary, which the restructuring and vetting have not by themselves secured. The independence of the bodies investigating corruption and organized crime should be secured on the same basis, alongside rules on appointments and evaluations that cannot be altered once a process has begun, and parliamentary oversight of emergency powers.

For external partners

Sustain support against corruption and organized crime, and extend it to those who hold the government to account. Many of the government bodies that tackle corruption and organized crime – and that guard against the return of state capture – depend heavily on donor funding, and will remain so for some time. Moldova has largely built a framework against both but lacks the capacity to give effect to it. Support should therefore concentrate on that capacity, across the bodies that enforce the framework and the parts of the administration the reforms have yet to reach. It should also extend to parliament, whose scrutiny checks the government, and independent journalists and civil society groups whose monitoring continues to uncover both corruption and organized crime.

Leverage the accession process to secure the political conditions on which the recovery from state capture depends, rather than exerting pressure for institutional reform alone. The durability of the recovery from state capture rests on political conditions more than it does on gaps in the institutional framework, and those conditions are the most serious of the risks this report identifies. EU integration has historically been a key driver of reform in Moldova and it is also the principal external force working against those risks, since the prospect of membership can sustain a government's commitment to reform where domestic politics may not. Its effectiveness depends, however, on the EU keeping membership a credible prospect and sustaining the pace of negotiations. Applied to the political conditions, leverage means pressing the government to exercise restraint in its use of executive and emergency powers, and to anchor the reforms in institutions rather than leaving them dependent on the government's own will. The priority is strengthening judicial independence and that of the bodies that prosecute corruption and organized crime, which restructuring and vetting have not by themselves secured. It also means avoiding mistaking legislative and institutional output for genuine reform, since earlier administrations produced such output under external pressure and it yielded only nominal gains.



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