

## EU Money Monitor

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**From:** EPPO Press <EPPO-Press@epo.europa.eu>  
**Sent:** Wednesday, 30 April 2025 16:55  
**To:** EU Money Monitor  
**Cc:** EPPO Private Parties; EPPO Press  
**Subject:** RE: (!) Journalistic inquiry and request for comments

Dear Ms Paduraru,

When your complaint was registered, all available information was thoroughly assessed. Based on that assessment, it was concluded that there was insufficient evidence at the time to establish the EPPO's competence to open an investigation.

As mentioned in my previous message, should you -or any other private party- have additional information to support the allegations, or if you wish to further substantiate your claims, the EPPO has a procedure in place to re-evaluate decisions. Any new, relevant information may lead to a reconsideration of the case.

Kind regards,  
Tine Hollevoet

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**From:** EU Money Monitor <watch@brussels-leaks.eu>  
**Sent:** 25 April 2025 05:49  
**To:** EPPO Press <EPPO-Press@epo.europa.eu>; Ville.ITALA@ec.europa.eu; olaf-courrier@ec.europa.eu; EPPO Info <info@epo.europa.eu>  
**Cc:** OLAF-MEDIA@ec.europa.eu  
**Subject:** RE: (!) Journalistic inquiry and request for comments

Dear Ms. Hollevoet,

Thank you for your reply and for explaining EPPO's position on how reports are assessed.

However, your last message directly contradicts the official notification issued by EPPO on November 23, 2024 (Ref. P.001733/2024 - PP.02676\_2024\_EN, attached in the previous email). The language of that letter is unequivocal. It does not suggest that reopening the case would be possible upon further submission of information. Quite the opposite: it categorically forecloses any follow-up engagement: *"The EPPO has accordingly now closed its case file regarding this matter and will not be in a position to respond to any queries regarding your report."*

Now, in your latest message, you are stating on behalf of EPPO, as Head of Communication – Spokesperson, that **rapporteurs could "always submit additional information"**, meaning "more evidence", or exhibits and that EPPO has a process to reopen cases if new elements are provided.

This contradiction becomes even more concerning when considering the timeline: the closure letter was issued exactly **4 working days** after the submission of evidence. At the same time, the letter explicitly states that *"for reasons of operational security, the EPPO is currently unable to process external links and e-mail attachments"* — the exact format in which supporting documentation was provided.

Given these facts, we are compelled to ask: how could EPPO have carried out a proper assessment of the submitted evidence within just four days, especially if the operational policy prevents opening attachments

or accessing links where the evidence was provided? What was actually reviewed before the closure decision was made, and by whom? How does this process align with the principle of legality under Article 5 of the EPPO Regulation and your stated claim that there is “no margin of discretion” involved in the assessment of reports?

Note also that OLAF’s 6-months after the submission reply was “*the facts are related to a possible offence to the EU financial interests, liable to be relevant for criminal prosecution. As such, the relevant information is reported to the European Public Prosecutor’s Office (EPPO)*”.

Furthermore, your own **2024 annual report** confirms that 4.212 private reports were dismissed as outside EPPO’s competence. Were those cases also dismissed after a 4-days assessment? This massive filtering at the entry stage demonstrates that, in practice, these decisions fundamentally rely on the subjective judgment and interpretation of the assigned European Prosecutors. This makes the claim that “no margin of discretion is involved” difficult to reconcile with the real decision-making process.

In the interest of clarity, transparency, and fairness to all parties involved, we would like to understand:

1. **If the reopening of closed files is indeed standard practice, why is this not communicated transparently in your formal closure letters?** How could a rapporteur ever provide extra information when a new potential submission is in advance fully discouraged by EPPO within the dismissal letter?
2. **What is the level of evidence expected from reporting parties to trigger an investigation?** Does EPPO require private individuals or organizations to provide proof equivalent to the burden of evidence expected in prosecution? How does this align with the principle that EPPO should act on reasonable suspicion, not on a fully proven case?
3. **How does EPPO’s dismissal process align with the EU Whistleblower Directive (2019/1937)?** This Directive protects whistleblowers who report in good faith and on reasonable belief, without requiring them to fully prove the case themselves.

These contradictions raise serious questions about how EPPO handles reports in general and the consistency of its assessment process.

This inquiry is made in the public interest and in line with Article 41 of the EU Charter of Fundamental Rights. We look forward to your written clarification, which will be published in full to ensure transparency and accountability. Our publication is planned for May 5, 2025.

Thank you for your attention. We remain available if you would like to discuss any of these points further.

Kind regards,  
Anca Paduraru

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**From:** EPPO Press <[EPPO-Press@eppo.europa.eu](mailto:EPPO-Press@eppo.europa.eu)>

**Sent:** Thursday, 24 April 2025 16:18

**To:** EU Money Monitor <[watch@brussels-leaks.eu](mailto:watch@brussels-leaks.eu)>; [Ville.ITALA@ec.europa.eu](mailto:Ville.ITALA@ec.europa.eu); [olaf-courrier@ec.europa.eu](mailto:olaf-courrier@ec.europa.eu); EPPO Info <[info@eppo.europa.eu](mailto:info@eppo.europa.eu)>

**Cc:** [OLAF-MEDIA@ec.europa.eu](mailto:OLAF-MEDIA@ec.europa.eu); EPPO Press <[EPPO-Press@eppo.europa.eu](mailto:EPPO-Press@eppo.europa.eu)>

**Subject:** RE: (!) Journalistic inquiry and request for comments

Dear Ms Paduraru,

In accordance with the EPPO Regulation and the principle of mandatory competence (or, more exactly, principle of legality in prosecution), our Office is obliged to open a criminal investigation every time that a report, regardless of whom it comes from, contains sufficient elements to conclude that a criminal offence falling within our competence is being, or has been committed. Any assessment which the EPPO makes on the content of crime reports is exclusively aimed at establishing whether this legal condition is met. There is no margin of discretion involved, nor does the EPPO choose which cases it does or doesn't open based on other considerations.

Every report from a private party is, after a pre-assessment, sent to the competent European Prosecutor for assessment and decision. In the notification to the private party after that decision, no details are provided. Private parties can always submit additional information if they wish to substantiate their claims or if they disagree with the decision. The EPPO has a process of re-opening a case if the private parties send additional information.

Best regards,  
Tine Hollevoet

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**From:** EU Money Monitor <[watch@brussels-leaks.eu](mailto:watch@brussels-leaks.eu)>  
**Sent:** 24 April 2025 07:40  
**To:** EPPO Press <[EPPO-Press@eppo.europa.eu](mailto:EPPO-Press@eppo.europa.eu)>; [Ville.ITALA@ec.europa.eu](mailto:Ville.ITALA@ec.europa.eu); [olaf-courrier@ec.europa.eu](mailto:olaf-courrier@ec.europa.eu); EPPO Info <[info@eppo.europa.eu](mailto:info@eppo.europa.eu)>  
**Cc:** [OLAF-MEDIA@ec.europa.eu](mailto:OLAF-MEDIA@ec.europa.eu)  
**Subject:** RE: (!) Journalistic inquiry and request for comments

Dear Ms. Hollevoet,

Thank you for your recent reply regarding EPPO's principle of "mandatory competence" and your stated obligation to follow up on any lead within your remit.

In line with journalistic standards and our mission to inform the public, we request further clarification on what appears to be a major inconsistency between your office's stated principles and the official notification we hold from EPPO dated **November 23, 2024** (Ref. P.001733/2024 - PP.02676\_2024\_EN, attached). This notification concluded that the reported case fell outside EPPO's scope of competence and was therefore closed without investigation.

Your recent communication affirms unequivocally that competence under EPPO's remit is not discretionary but mandatory. Yet this directly contrasts with the closure decision communicated regarding the report in question — which involved documented allegations of suspected EU fund misuse, disguised employment, project fragmentation, invoice inflation, and financial misreporting.

We refer also to your 2024 annual report, which states: EPPO received 6.547 reports/complaints in total. Of these, 4.623 were submitted by private individuals or legal entities. From the private party reports, only 871 were deemed relevant and registered into the Case Management System for verification. Conversely, **4.212 reports from private parties were considered "clearly outside of EPPO's jurisdiction"**, either dismissed outright or referred to other authorities (page 87 of the report).

These numbers reveal a major exclusion rate of private reports at the entry stage — raising legitimate public interest questions about the consistency and legal criteria applied in these assessments, particularly given EPPO's core mission to close enforcement gaps left by national authorities.

In this context, we formally request clarification on the following key points:

1. **Legal basis for dismissal:**

On what exact legal grounds — with reference to the PIF Directive (2017/1371), Regulation (EU) 2017/1939, and Belgian national law — was the report assessed as outside EPPO's competence? Please specify which material, territorial, or personal conditions were not considered met.

2. **Filtering and assessment methodology:**

From the 4.212 private party reports excluded in 2024, how many concerned suspected fraud involving EU project funds (including expenditure fraud, non-procurement fraud, or employment scheme abuse)? What methodology, thresholds, or criteria does EPPO apply to determine these reports as "*manifestly outside jurisdiction*", especially when cross-border elements are present?

3. **Consistency with expenditure fraud priorities:**

Your Annual Report highlights **expenditure fraud (non-procurement)** and **VAT fraud** as key priority typologies under current EPPO investigations. Belgium ranks as the **14th most active country**, with **30 investigations opened from 141 reports received**. Given these priorities and the typology of the reported irregularities — including disguised employment cross-border schemes, over 45% of total HR budgets absorbed by one freelance invoicing via his company - the executive director, questionable project hour reporting across more than 40 EU-funded projects, and micro-AISBL status abuse — how did this report fail to meet EPPO's material scope for investigation?

4. **Consultation with OLAF and national authorities:**

Did EPPO consult with OLAF or Belgian authorities before concluding that this case fell outside its scope (November 2024), as foreseen under Article 24(4) of Regulation 2017/1939? If not, what prevented this coordination?

5. **Public accountability and transparency:**

The Annual Report rightly emphasizes **transparency as key to maintaining citizen trust**. However, the dismissal notification provided no legal reasoning, no typology classification, nor a clear explanation of how the decision aligned with your stated mandatory competence. To ensure consistency with these commitments, will EPPO consider publishing (even in redacted form) the legal reasoning applied in such decisions, including in this case, to reassure the European public that such dismissals are not arbitrary?

These questions go to the heart of public confidence in EPPO's role and mandate. Our platform is preparing to publish its findings on systemic oversight gaps in the supervision of EU-funded projects in Belgium, with a dedicated section evaluating the role of European institutions, including EPPO, in addressing such cases.

In line with the right of reply and our journalistic duty to provide balanced reporting, we remain fully open to publishing your clarifications or formal reply in full alongside our upcoming publication.

Given the planned publication date of May 5, 2025, we respectfully request your written reply no later than **May 2, 2025**. Your response will be included unedited and in its entirety.

Thank you for your attention. We remain available for any further clarifications.

Respectfully,

Anca Paduraru

**on behalf of the EU Money Monitor editorial team**

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**From:** EPPO Press <[EPPO-Press@eppo.europa.eu](mailto:EPPO-Press@eppo.europa.eu)>

**Sent:** Wednesday, 23 April 2025 18:49

**To:** Anca PADURARU <[watch@brussels-leaks.eu](mailto:watch@brussels-leaks.eu)>; [Ville.ITALA@ec.europa.eu](mailto:Ville.ITALA@ec.europa.eu); [olaf-courrier@ec.europa.eu](mailto:olaf-courrier@ec.europa.eu);  
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**Subject:** RE: (!) Journalistic inquiry and request for comments

Dear Ms Paduraru,

Thank you for reaching out to us.

As a matter of principle, the EPPO does not comment on ongoing investigations, nor do we publicly confirm which cases we are working on. This is so as not to endanger the possible ongoing procedures and their outcome. Whenever we can say something about any of our investigations, we will do so proactively.

Please let us also remind you that our competence is mandatory, which means that we must follow up on any lead within our remit. Be assured that we do so diligently.

If you wish to have more information on EPPO's activities, I invite you to have a look at [our latest annual report](#), with statistics of 2024 per Member State.

If you wish to receive our press releases, you can [subscribe through our website](#).

Kind regards,  
Tine Hollevoet



**Tine HOLLEVOET**  
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**From:** Anca PADURARU <[watch@brussels-leaks.eu](mailto:watch@brussels-leaks.eu)>

**Sent:** 23 April 2025 05:31

**To:** [Ville.ITALA@ec.europa.eu](mailto:Ville.ITALA@ec.europa.eu); [olaf-courrier@ec.europa.eu](mailto:olaf-courrier@ec.europa.eu); EPPO Press <[press@eppo.europa.eu](mailto:press@eppo.europa.eu)>; EPPO Info <[info@eppo.europa.eu](mailto:info@eppo.europa.eu)>

**Subject:** (!) Journalistic inquiry and request for comments

*We formally request that this correspondence and the attached documentation be brought to the personal attention of Ms. Laura Codruța Kövesi, European Chief Prosecutor, and Mr. Ville Itälä, Director-General of OLAF, given its direct relevance to the institutional integrity, investigative responsibilities, and public trust in both EPPO and OLAF.*

To:  
European Anti-Fraud Office (OLAF)  
European Public Prosecutor's Office (EPPO)

Esteemed **Ms. Laura Codruța Kövesi** and **Mr. Ville Itälä**,

Following the exhaust of all public channels throughout 2024 and early 2025 — including whistleblower complaints, requests for investigation, and repeated inquiries regarding institutional inaction — we are writing to inform you that we will shortly proceed with the **publication of an investigative series** concerning systemic accountability gaps in EU funding oversight.

The investigations in question, content listed within the formal letter attached as Annexes, are:

1. A data-based analysis of OLAF's concluded investigations from 2014 to 2023, revealing stark discrepancies in the number of cases per EU Member State — including the near-total absence of Belgium and Luxembourg in OLAF's record of concluded investigations.
2. A detailed case study involving a Brussels-based AISBL, which has received over €5 million in EU funds since 2018. The investigation includes documented allegations of disguised employment, self-enrichment of executive management via public grants, and repeated institutional inaction by Belgian (SPF Finance, SPF Emploi, ONSS, The federal Ombudsman) and EU authorities.

In line with **standard editorial ethics and the right of reply**, we are offering both OLAF and EPPO the opportunity to comment on the content of these investigations prior to their full publication.

(!) Please note that the investigations do not list OLAF's most recent reply within the Belgian AISBL case study investigation (reference number 19473, case OC/2024/1165): **the decision to further refer the matters to EPPO** – who has already declined competence over this exact case in November 2024, as stated in their report P.001733/2024 - PP.02676\_2024\_EN. We have taken the editorial decision to not disclose this information yet, waiting for your excellencies formal replies to support presenting this information responsibly to the public.

**Please consider this a formal journalistic inquiry and request for comment.** The full formal letter is attached.

Please do not hesitate to reach out should you require additional clarification or context. We assure you of our deepest consideration,

The Eu Money Monitor editorial team  
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