The **Bulgarian Helsinki Committee** (BHC) is an independent non-governmental organisation for the protection of human rights: civil, political, economic, social and cultural. In our work we place a special emphasis on protection of the rights of the most vulnerable groups in Bulgaria: ethnic minorities, underprivileged groups, persons deprived of their liberty, people in institutions, children, women. The BHC objectives are to promote respect and support the protection of human rights, to lobby for bringing Bulgarian legislation in line with international standards, to promote public debate on human rights issues and popularize the human rights cause among the public at large.

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Table of contents

MONITORING AND RESEARCH PROGRAMME ................................................................. 5
  1. MONITORING THE HUMAN RIGHTS SITUATION IN BULGARIA AND PREPARING REPORTS AND RECOMMENDATIONS ................................................................. 6
  2. WORK IN STRATEGIC HUMAN RIGHTS AREAS ...................................................... 6
  3. PUBLIC ADVOCACY THROUGH THE MEDIA, TAKING PART IN CONFERENCES AND WORKING GROUPS ......................................................................................... 9
  4. STRATEGIC LITIGATION BEFORE THE ECtHR AND IN THE PROCEDURE FOR IMPLEMENTATION OF JUDGEMENTS ................................................................. 10

LEGAL DEFENSE PROGRAMME ................................................................................. 11
  1. STRATEGIC CASES AND LEGAL ADVOCACY ....................................................... 12
  2. INTERNATIONAL LEGAL ADVOCACY .................................................................. 13
  3. OPINIONS ON PROPOSED LEGISLATIVE AMENDMENTS ..................................... 14
  4. TRAININGS AND CAMPAIGNS ON HUMAN RIGHTS ............................................ 15
  5. COMPLAINTS SUBMITTED TO BHC ..................................................................... 16

REFUGEES’ AND MIGRANTS’ LEGAL PROTECTION PROGRAMME .............................. 16
  1. LEGAL ADVICE AND LEGAL AID REGARDING APPLICATIONS FOR PROTECTION AND ACCESS TO PROCEEDINGS ...................................................... 16
  2. CASES BEFORE THE ADMINISTRATIVE COURTS AND STRATEGIC LITIGATION ................................................................. 17
  3. TRAININGS AND PUBLICATIONS ..................................................................... 18

CAMPAIGNS AND COMMUNICATIONS PROGRAMME ................................................. 18
  1. INTERNET SITES, SOCIAL NETWORKS AND NEWSLETTER .................................. 19
  2. COMMUNICATION WORK IN SUPPORT OF BHC PROJECTS ............................... 20
  3. CAMPAIGNS ..................................................................................................... 21
  4. CRISIS COMMUNICATION .................................................................................. 23
  5. PARTNERSHIPS ................................................................................................. 24
  6. FUNDRAISING FROM INDIVIDUAL DONORS .................................................. 24

PROGRAMMING AND ADMINISTRATION ................................................................. 25
  1. FUNDRAISING AND MAIN DONORS IN 2019 ..................................................... 25
  2. ADMINISTRATION AND ACCOUNTABILITY ....................................................... 27
  3. PROJECT WORK, ORGANIZATIONAL CAPACITY TRAINING ............................. 27
  4. PROJECT FUNDING SHARES IN 2019 ............................................................... 28

BOLD - BULGARIANS ORGANISING FOR LIBERAL DEMOCRACY ............................. 29

PUBLICATIONS ..................................................................................................... 29

BHC STAFF ............................................................................................................. 31

AUDITOR’S REPORT, ANNUAL FINANCIAL REPORT AS AT 31.12.2019 ................. 32
During 2019, the Bulgarian Helsinki Committee (BHC) carried out its activities through its five permanent programmes - Monitoring and Research Programme, Legal Defence Programme, Refugees’ and Migrants’ Legal Protection Programme, Campaigns and Communications and Programming and Administration.

Over the past year, the organization focused on monitoring the human rights situation in a number of priority areas, preparing independent reports to key human rights bodies, conducting strategic litigation before Bulgarian and international courts with a potential long-term impact on the human rights situation in Bulgaria.

Activities were complemented by public campaigns and communications work aimed at giving additional visibility of our work and ensuring more public support for human rights issues. The focus of our communications work over the past year was the implementation of several projects developing new communication opportunities to reach different audiences and the implementation of the campaigns planned for the year.

For the first time, we used virtual reality technology to engage the audience.

Several positive aspects from last year included our successful efforts to improve partnerships with activists working with vulnerable groups and other organizations working in the liberal and human rights spectrum, as well as successful established media partnerships.

In 2019, the BHC launched a new initiative aimed at consolidating and enhancing public support for democracy, human rights and the rule of law. The project was launched in April 2019 and is called BOLD - Bulgarians Organising for Liberal Democracy.

Below is an outline of what we did in 2019 grouped within the work of our five programmes.

### MONITORING AND RESEARCH PROGRAMME

The Monitoring and Research Programme monitors the human rights situation in Bulgaria in a number of key areas identified in the BHC Strategy 2018-2023. These include law enforcement, discrimination on certain grounds, the situation of the Roma, human rights of people with mental health disorders, the rights of prisoners, the rights of children, minority rights, freedom of association and access to a lawyer. The programme had a key role in the writing of the BHC’s Annual Human Rights Report for 2018. It produced 10 of the 16 chapters of the report.

In 2019, the programme implemented four main types of activities:

- Monitoring the human rights situation in Bulgaria;
- Work on projects funded by various donors in BHC priority areas;
- Public advocacy through the media, participation in conferences, meetings and working groups;
- Work on strategic cases at the European Court of Human Rights (ECtHR) and in the procedure for implementing ECtHR judgments.
1. MONITORING THE HUMAN RIGHTS SITUATION IN BULGARIA AND PREPARING REPORTS AND RECOMMENDATIONS

The programme monitored all materials related to human rights in Bulgaria produced by local and international observers. At the same time, it conducted focused monitoring in various areas to obtain first-hand information about the human rights situation in them. The vast amount of data is summarized in the annual report on human rights in Bulgaria and in reports to international human rights organizations.

In early 2019, BHC researchers interviewed prisoners about their rights during police detention. We visited nearly half of the prisons in Bulgaria to obtain information on the situation of prisoners serving life imprisonment without parole. We visited the pre-trial detention centers in Silistra, Dobrich, Haskovo and Svilengrad, after which information about the extremely poor conditions in the cells was sent to the Minister of Justice.

In October 2019, the BHC prepared an alternative report on the Convention for the Protection of National Minorities, summarizing information on the legislation and practice on hate crime, discrimination and forced evictions of Roma and the implementation of the new Law on Non-Profit Legal Entities against Macedonian Associations. In November, during the visit of the Advisory Committee on the Framework Convention in Bulgaria, the BHC met with the delegates.

The BHC provided information and logistical assistance during the visit of the Council of Europe Commissioner for Human Rights during her visit to Bulgaria. The focus of the visit was minority rights and freedom of expression. On both topics, the BHC participated in meetings between the Commissioner and interested non-governmental organisations and the media.

In December 2018, the BHC presented an alternative report to the UN Committee on Economic, Social and Cultural Rights for the review of Bulgaria’s report during the committee session on 21-22 February 2019. A representative of the BHC had no opportunity to travel to Geneva for presenting the report in person. At the proposal of the committee, an online session was organized on February 20, at which the BHC chairman held a one-hour dialogue with its members. The recommendations made by the BHC in its alternative report were largely taken into account when formulating the recommendations of this important contracting authority.

2. WORK IN STRATEGIC HUMAN RIGHTS AREAS

In 2019, the Monitoring and Research programme worked on several projects addressing key human rights issues in Bulgaria.

- Harmonization of EU Standards on Detention Project

The project, funded by the European Union, started in early 2019 with partner organisations from Austria, Italy and Hungary, under the coordination of the Boltzmann Institute for Human Rights. Its core activity is to strengthen the capacity of National Preventive Mechanisms (NPMs) across Europe. BHC developed a thematic dossier "Groups of prisoners in a situation of vulnerability". In November, the first expert meeting of partner organizations, external experts and NPM representatives was held with over 30 representatives of partner organizations from Austria, Hungary and Italy, and NPM representatives from 11 European countries and two external experts. Five heads of Bulgarian prisons attended the meeting. The Director of the Monitoring and Research Programme prepared a presentation for the second expert meeting on "The Challenges of Solitary Isolation in Bulgaria".
The project was coordinated by Stanimir Petrov. Krassimir Kanev also took part in the activities.

- **NO HATE BG Project: Together to Protect Minorities and Combat Hate Crimes**

The project is being implemented in a consortium with leading organisation BHC and partners Center for Interethnic Dialogue and Tolerance Amalipe and Human Rights Defenders - Sweden with EU support. The project combines the efforts to combat intolerance and hate crimes against vulnerable groups in Bulgarian society through greater visibility of bias-motivated crimes.

Within the project, we monitored the situation of ethnic minorities and other vulnerable groups. 11 regional roundtables were held with non-governmental organisations, local authorities, educators, the media and other stakeholders, where local ethnic and religious communities, anti-domestic violence organisations, LGBTI organizations, as well as individual victims discrimination and hate crimes (e.g. Roma from Voivodinovo, who participated in the round table in Plovdiv) shared their experiences. In turn, local government representatives presented their views on the issues raised. An important part of the project was the exchange of experience and good practices in Sweden for 10 representatives from Bulgaria.

We drafted two documents within the project: a research report entitled "Bias-Motivated Crimes" and a review report "Minorities in Bulgaria - Easy to Hate". The first document focuses on the international standards and the review of the international recommendations to Bulgaria on the topic of change of national legislation and emblematic examples from Bulgarian case law on the topic. The second document is an overview and summarizes the current situation in Bulgaria through the lens of discussions. The separate sections also focus on the practices of reaction to prejudice-related crimes committed against each of the target groups: Roma, LGBTI, Turks and Muslims, the Jewish community, refugees. The review also presents the views of leading independent experts from the civil sector and government institutions.

The project was coordinated by Antoaneta Nenkova. Krassimir Kanev, Dilyana Angelova and Desislava Simeonova also took part in the activities.

- **Project "Medical Services, Drug Use and the Spread of HIV in Prisons in Bulgaria"**

In 2019, the programme worked on the project "Medical Services, Drug Use, and the Spread of HIV in Prisons: Mapping the Situation in Bulgaria", funded by the Robert Carr Fund. The project focused on two extremely vulnerable groups in prisons - those that use drugs and those with HIV/AIDS.

The project reviewed existing legislation, policies and measures related to the provision of prevention, diagnosis, treatment, care and support to persons belonging to these vulnerable groups in detention facilities. The project also included interviewing prisoners with HIV/AIDS.

In December 2019, we organized a two-day meeting on the issues of people living with HIV and people using drugs in which lawyers and activists from Russia, Moldova, Ukraine, Georgia, Kosovo participated. The study for Bulgaria found a significant decrease in the number of HIV studies conducted in prisons and detention centers, delays in the provision of antiretroviral therapy for HIV patients, lack of measures to limit the spread of infection, very limited access to subsidized treatment for drug addiction for persons deprived of freedom. BHC's involvement in this project expands our monitoring of prisoners with a focus on one extremely vulnerable group.

The project was coordinated by Dilyana Angelova. Krassimir Kanev and Stanimir Petrov also worked on the project.
In 2019, the BHC continued its work on this EU-funded project coordinated by Fair Trials-Europe. The project aims to educate the legal community about the unconscious prejudices against the Roma who are overrepresented in the criminal justice system, to make recommendations and to highlight good practices. Our research analyzes legislation, observations of international authorities and organizations, and practices on the protection against discrimination and integration of the Roma. In 2019, BHC researchers conducted a desktop and field study, including interviews with magistrates, police officers, lawyers and prisoners on the issues of ethnic profiling and discrimination against Roma in criminal proceedings. We collected a considerable amount of information and took into account the views of all participants in the criminal process. The results of the study are to be announced in 2020.

The project was coordinated by Dilyana Angelova. Slavka Kukova and Stanimir Petrov also worked on the project.

BHC finalized its work under a research project "Strengthening the judicial protection of fundamental rights of detainees in the European Union", implemented jointly with the European Network of Legal Advocacy for Deprived Persons, European Universities and NGOs from ten European countries. The project is funded by the EU. It is aimed at protecting fundamental rights and access to legal aid for detainees in the European Union.

One of the key activities in which the BHC participated was the drafting of a White Paper on access to justice for pre-trial detainees - a report based on comparative analysis and empirical research in the nine project partner countries.

The project was coordinated by Dilyana Angelova. Krassimir Kanev also worked on part of the activities.

The activities of this project with partners The Hungarian Helsinki Committee, the Center for European Constitutional Law (Greece), APADOR (Romania), Antigona (Italy) and the leading organization Fair Trials were implemented until June 2019 with the support of the EU.

The project helped the full and correct implementation of the EU Council Roadmap Directives on procedural rights of suspects and accused persons by analyzing obstacles to the rights of suspects and the accused to have access to and assistance from a lawyer, to advocate effective advocacy protection at pre-trial detention and to prevent the arbitrary application of pre-trial detention. Within the project, leading criminal lawyers, judges and non-governmental organizations were consulted in order to improve access to the legal assistance of detainees. At the end of the project, a Handbook for Lawyers was issued and presented at a round table in Plovdiv to assist them in providing legal assistance to detained and accused persons. Lawyers from the Bar Associations in Sofia, Plovdiv, Pazardzhik and Stara Zagora attended the roundtable. The handbook was also sent to the Supreme Bar Council for distribution throughout the country.

Slavka Kukova was the project coordinator. Krassimir Kanev also worked on the project.

In 2019, the Monitoring and Research Programme took a major part, along with other BHC programmes, in developing an online human rights guide for Bulgaria. The project is implemented in partnership with the Baltic Human Rights Society, based in Latvia, and is funded by various international sources, including the
Erasmus programme. The project partners are NGOs from Estonia and Lithuania, and since 2020 from several other countries in Eastern Europe. The project aims to familiarize Bulgarian citizens with fundamental rights and freedoms and the mechanisms for their protection at national and international level.

The guide is organized into several topics in Bulgarian and English and is available online at [http://www.humanrightsguide.bg/bg/temi/](http://www.humanrightsguide.bg/bg/temi/). In 2019, the Bulgarian team completed eight topics, six of which were the work of the Monitoring and Research Programme. Some of the topics are researched extensively and include information of 200 pages each.

The official publication of the handbook took place on 29 May 2019 at the House of Europe. In December 2019, a new contract to expand the handbook was signed.

Krassimir Kanev was the project coordinator. Dilyana Angelova, Slavka Kukova, Yana Burer-Tavanier and Raya Raeva also worked on the project during the year.

3. PUBLIC ADVOCACY THROUGH THE MEDIA, TAKING PART IN CONFERENCES AND WORKING GROUPS

In 2019, BHC researchers had numerous media appearances. At the beginning of the year, a number of media outlets covered the work of the BHC in the case of the expulsion of more than 100 Roma from their homes in the village of Voyvodinovo. The director of the programme was interviewed by several national media on the topic and participated in central television broadcasts on several national television channels and radios. A new wave of media publicity followed in September-October in connection with a decision by the Sofia Court of Appeal to release Jock Palfreeman from prison. In connection with this the programme director appeared on one of the most watched TV shows on bTV on October 6, 2019.

Other media appearances during the year were in connection with the BHC’s campaign to implement ECtHR judgements; the proposal for a concept for Roma integration by Deputy Prime Minister Karakachanov; Sofia Pride 2019; VMRO’s proposal to end BHC; the celebration of the 30th anniversary of the events in the Crystal Garden in October; the presentation of the “Man of the Year-2019” awards and the award given to Krassimir Kanev by the Grand Mufti of Bulgaria in December.

In July and August 2019, a researcher from the programme assisted in the preparation of the coverage by providing information to the BBC and Al Djazeera English-language journalism teams on community services for children and adults with disabilities, as well as the creation of an EU website on the rights of children and adults people with disabilities in Bulgaria. English television reports, along with a report by the American disability organization Disability Rights International, revealed a number of human rights violations of family-based detention centers for children and adults in various cities in the country.

A BHC researcher lobbied for child and adult care reform throughout the year by participating in two key working groups at MLSP - drafting the new Law on Social Services and reforming long-term care. The participation of BHC’s representative in the Permanent Expert Working Group at the MLSP was based on the organization’s view that the idea of reforming care for children and adults with disabilities should be realized through their reintegration into the community. At the initiative of a group of NGO experts, a letter to the EC was drafted in the Law on Social Services Working Group, summarizing three main expectations for EC intervention: a clear public statement on the importance of civil
society and civil society organizations as part of it; to call on the Bulgarian Government to protect the area for civic participation and to speak out against hate speech and any other allegations that call into question the need for civic organizations; to meet with NGO authors in Brussels to discuss the risk of what is happening to basic European values and principles.

The BHC is among the initiators of 35 NGOs that wrote a letter to the Ministry of Labour and Social Policy (MLSP) at the end of 2019, with proposals to resume work on the Law on Social Services. NGOs will continue to insist on the Law on Social Services to come into force and on starting to develop a by-law. The full willingness of NGOs to continue to participate actively and constructively in the process has been repeatedly emphasized.

In February 2019, the BHC participated in the annual meeting of the Fair Trials Legal Advisory Panel - a European network of criminal lawyers, NGO scientists and activists fighting for the protection of the right to a fair trial. As part of the event, the BHC expert presented the challenges Bulgaria faces in applying EU standards of due process, focusing on the situation of suspected detainees in the police force.

In June, the Director of the Monitoring and Research Programme provided training to police officers in standards for the investigation of crimes motivated by prejudice with a particular focus on LGBTI people. The training was organized by a consortium of LGBTI organizations from several NGOs focusing on the rights of these vulnerable groups in Bulgarian society.

4. STRATEGIC LITIGATION BEFORE THE ECtHR AND IN THE PROCEDURE FOR IMPLEMENTATION OF JUDGEMENTS

In 2019, the Monitoring and Research Programme was involved in the filing of several cases at the European Court of Human Rights (ECtHR) in Strasbourg. The largest action in this regard was the application to the ECtHR of 55 Roma applicants who had been expelled from their only housing in the village of Voivodino in January 2019 and the subsequent ban on their return to their homes. The preparation of the case involved considerable programme resources. The work involved several field visits to Plovdiv and other towns/villages and the collection of large volumes of documentation. A request for interim measures was filed and the intensive communication with the ECtHR accompanying this process followed. In April, the Court determined interim measures and prioritized the case, communicating it immediately to the Bulgarian government. By the end of 2019, the programme was involved in writing the Government’s response to the Court and in filing a complaint on behalf of one additional complainant.

As part of our programme’s monitoring of detention facilities, the BHC was once again confronted with the issue of life sentences without parole. This problem was compounded in 2019 by the arbitrary decisions of the Vice President of Bulgaria to refuse pardon of this category of convicts
who were not motivated and were not based on any objective criteria for examining the applications. The programme participated in the filing of two complaints to the ECtHR regarding life imprisonment without the possibility for parole for such arbitrary refusals by the Vice President.

The programme assisted a third group of complaints in the ECtHR, regarding the right of freedom of association of Macedonians in Bulgaria. During the year, Bulgarian courts issued two final decisions to refuse registration of two Macedonian associations. In both cases, the programme helped the applicants to file complaints with the ECtHR on the violation of their right to freedom of association.

In 2019, the Monitoring and Research Programme presented four opinions to the Committee of Ministers to review the implementation of ECtHR judgments. All of them have been subject to enhanced observation by the Committee on the right to freedom of association, the use of special intelligence and the illicit use of force and firearms by law enforcement agencies. All opinions were taken into account by the Committee. The enhanced monitoring of all the groups of judgments on which our programme submitted opinions was not terminated in 2019.

LEGAL DEFENSE PROGRAMME

In 2019, the BHC Legal Defence Programme (LDP) was engaged in the conduct of strategic cases and strategic legal advocacy. The programme handled cases before the Bulgarian and international judicial and quasi-judicial bodies. Our legal advocacy was expressed in opinions on interpretative and constitutional cases at the invitation of the Supreme Courts and the Constitutional Court, opinions as a third party in cases before the ECtHR, participation in working groups for drafting bills and opinions on bills before the National Assembly. LDP participated in the preparation of reports, monitored the case-law and practice of the Commission on Protection against Discrimination (CPD) under the Law on Protection against Discrimination. Programme experts produced a number of legal studies and participated in trainings as lecturers.

During the year, the isolation in which BHC had to work increased. It was most pronounced in the decline in calls for opinions on interpretative cases, constitutional cases, for participation in drafting working groups, including the absence of an invitation to the BHC to participate in consultations organised by the President in recent months, concerning changes to the Constitution regarding the status of the Attorney General and the introduction of an individual cassation appeal. Cooperation with the Prosecutor’s Office for general human rights objectives is stagnant, with the tendency for the crisis in relations to deepen given the open opinion of the Legal Defence Programme against the nomination of the newly-appointed Attorney General. Relations with the Prosecutor’s Office were initially complicated due to the fact that the programme has repeatedly focused on the weaknesses of crime investigations, representing victims of crime from vulnerable groups and victims of police violence.

Over the past year, Bulgarian society seems even more overwhelmed by the sense of hate speech not being sanctioned. A number of speeches by ruling politicians against minority groups - Roma and LGBT - remain without sanctions. BHC’s work is further complicated by the media environment and the escalating tension over reforms in the field of social services and children’s rights.
1. STRATEGIC CASES AND LEGAL ADVOCACY

In 2019, LDP continued to pursue strategic cases before the Bulgarian courts, the Commission on Protection against Discrimination (CPD) and the ECtHR and the Human Rights Committee at the United Nations. The main focus of our work were cases of discrimination, of crimes with a discriminatory element and of the forced removal of the Roma affected by poverty from their only homes due to the illegality of the buildings. Related to the latter are some separate filing procedures for municipal housing and for issuing an identity document. The total number of cases covered by our programme this year was at least 58 court cases, including before the CPD, 12 pre-trial proceedings and preliminary inspections and 11 before the ECtHR and the Human Rights Committee at the United Nations.

Throughout the year, LPD continued to use both methods of protection under the Law on Protection against Discrimination - proceedings before civil courts and before the CPD. Our focus was on cases of discrimination based on the 6 main protective grounds of the EU's anti-discrimination directives. In 2019, LPD provided legal assistance in 17 cases of breaches of anti-discrimination legislation. Our work focused on cases and files on the grounds of ethnicity/race and religion (11 in total), followed by cases of disability (3), and cases of gender discrimination and sexual orientation. During the year, LDP provided legal assistance in three prosecutions of human rights defenders, two of which directly concerned the BHC and its chairman. The ratio between the cases under the Law on Protection against Discrimination brought before the courts and the files brought before the CPD was maintained in favour of the second group of proceedings. This is because the proceedings before the CPD are more devoid of formalism, and often, though not always, they are completed in a shorter timeframe, and are cheaper.

In 2019, LDP represented victims of racially motivated crimes in 8 individual cases. Two of the cases concerned police violence against Roma. The ongoing tendency for investigations of this type of crime to be lengthy makes the extent of their effectiveness doubtful. In one case, the pre-litigation prior to the initiation of the pre-trial proceedings lasted 9 months. A case has been registered in which an investigative authority made inadmissible suggestions regarding the BHC and its lawyers to the wife of the victim living abroad. The same investigator categorically refused to use technical means for conducting interrogations in accordance with Art. 139, para. 7 of the Code of Criminal Procedure - by videoconference or telephone conference. These circumstances illustrate the tendency towards the BHC.

In 2019, the LDP worked on the Gabrovo case - arson and vandalism of houses occupied by Roma during protests over a beating of a shopkeeper in Gabrovo carried out by three Roma in Gabrovo in April 2019.

LDP provided procedural representation of 15 people who were threatened or homeless in a total of 28 cases before national courts (of these 28 cases, 22 were about Voivodinovo, 5 were of people from Orlandovtsi, Sofia and 1 were about Arman Mahala, Plovdiv). In addition, legal protection was provided in 5 administrative cases related to the filing of Roma long-term residents in illegal buildings located in restituted properties. These cases relate to the refusal of the administrative authorities to recognize the need for Roma at risk of homelessness to be accommodated in municipal housing. The work on the cases brought on behalf of persons without identity cards continued - 6 cases were concluded at first instance in their favour, two of them continued and are pending before the Supreme Administrative Court. Two more proceedings were initiated due to the refusal of the administrative authorities to comply with the court's motives. Complaints were filed with the Prosecutor's Office and with the Chairman of the Supreme Administrative Court.
LDP also has a number of strategic cases, including: a case for finding the inaction of the Directorate General for the Execution of Sentences and the Ministry of Justice to provide a young man deprived of his liberty, suffering from a rare terminal disease, adequate and effective medical care and treatment during his sentence; the representation of a minor girl suffering from gang rape; adoption by a gay man; representation of a transgender person in a case for changing the gender, names and personal identification number in the birth certificate; representation of a newly registered Macedonian NGO, against which a claim has been filed by the Blagoevgrad District Prosecutor's Office for its closure; representation of a disabled boy, victim of violence, placed in a family-type accommodation center (FTAC); cases of police brutality - both during detention under the Law on Ministry of the Interior and without detention.

Some strategic cases are part of a group of lawsuits brought by persons who are victims of similar violations: e.g. the representation of the families who in 2019 were victims of mass evictions in the village of Voivodinovo; representation of people at risk of homelessness, prevented from filing as needing municipal housing; the representation of persons who have lived for years without personal identity documents.

In 2019, LDP submitted more than 100 applications for access to public information under the Law on Access to Public Information. The requests were addressed mainly to municipal and district mayors, but there were also applications to a minister and the prosecuting authorities. In their predominant part, mayors provided full or partial access to information - only four cases were opened and won in court on their refusals. We received a complete refusal from the Minister of Regional Development and Public Works to provide information on the number of persons without registration at a permanent address. We also received a tacit refusal from the Attorney General to provide a comprehensive list of his current guidelines and instructions.

2. INTERNATIONAL LEGAL ADVOCACY

During the year, LDP filed three complaints to the ECtHR: from a person who hasn’t been able to obtain an ID card for seven years and as a result has been detained twice, cannot start a job, cannot exercise his voting right, cannot obtain a diploma for secondary education, etc.; on behalf of three Roma families from the village of Voyvodinovo, who, as a form of collective punishment for a crime committed by other Roma, were expelled in early January 2019 from their homes, which were destroyed in their absence; on behalf of two Roma activists in connection with the extreme anti-Roma speeches of Valery Simeonov - a Member of Parliament, and currently Deputy Chairman of the National Assembly from the ultranationalist party - National Front for the Salvation of Bulgaria (NFSB).

We believe that from all our cases, the one that will have the most serious impact is the case brought before the ECtHR on behalf of a person who hasn’t been able to obtain an identity card for 7 years. The lack of identity documents is a problem for many Roma communities and is used as a tool for their expulsion from their places of residence. Through some of the cases before the Committee against Public Discrimination (CPD) on the grounds of disability, the LDP aims to reach a comprehensive and long-lasting solution to the problem of inaccessible urban environment - at this stage our attempts are directed towards small cases, but we will have a better idea of how to reach a more general solution to the problem after the outcome of these proceedings before the Committee against Public Discrimination.
In January 2020, LDP filed a complaint with the United Nations Human Rights Committee (UNHRC) on behalf of a girl professing Islam who had been harassed by a school principal and teachers for wearing a headscarf in class. The complaint to the UNHRC alleges violation of Article 18 of the International Covenant on Civil and Political Rights - Freedom of Thought, Conscience and Religion.

In the other two cases before the ECtHR, the LDP provided written opinions. The ECtHR found three complaints inadmissible (in one case due to the withdrawal of the complainants). In two other pending cases before the ECtHR, negotiations are underway to conclude agreements.

In April 2019, LDP provided information to the Committee of Ministers of the Council of Europe on the implementation of measures in the case of Yordanova and others v. Bulgaria. In January 2020, this information was supplemented by new developments in order to rebut the Government’s view that Bulgaria is on track to fulfill its obligations arising from this group of cases. Demolition of illegal Roma buildings continues to be widespread, regardless of the specific circumstances of the people living there and without providing alternative shelter to those at risk of homelessness.

3. OPINIONS ON PROPOSED LEGISLATIVE AMENDMENTS

In early January 2019, LDP sent a letter to the competent authorities asking the Constitutional Court to find a contradiction with the constitutionally recognized presumption of innocence of a text from the Law on Customs. As a result, the Supreme Bar Council approached the Constitutional Court and LDP provided an opinion within the constitutional case. The Constitutional Court declared the text in question unconstitutional under the Law on Customs.

In April, LDP gave an opinion on a bill amending and supplementing the Law on Administrative Violations and Sanctions. The bill envisages the introduction of two new administrative penalties - "unpaid labour for the benefit of the public" and "detention in the territorial structures of the Ministry of Interior" for up to 25 days, as well as deliberate procedures for imposing and executing these penalties. The BHC gave a negative opinion on this bill as it contradicts the prohibition of forced labour in the constitution and legally binding norms of international law.

In April, LDP also gave a negative opinion on the appointment of the then chairman of the parliamentary committee on legal affairs, Danail Kirilov, to the post of Minister of Justice. The reasons for this were Kirilov’s contributions as chairman of the parliamentary committee on the erosion of the rule of law and the undermining of civil rights and freedoms in Bulgaria.

In May 2019, LDP gave a negative opinion on a draft amendment to the Penal Code that provides for higher punishment for insult and libel committed by a Member of Parliament and other senior politicians, including imprisonment. The main argument for this is the protection of freedom of expression and the need for proportionality between the offense and the punishment.

Also in May 2019, LDP actively participated in public discussions on the amendments to the Penal Code, adopted at first reading, which provide for the elimination of the "inevitable defence" institute in some, uncertain, hypotheses that allow a broad interpretation of the concept.

In the summer and fall of 2019, LDP was particularly active in the process of selecting a new Attorney General. In October 2019 LDP submitted an opinion on the serious distortion of the selection procedure, the lack of necessary skills and knowledge of the only candidate for the post and put specific questions to the candidate.
In September 2019, LDP gave an opinion on the Supreme Court of Cassation’s interpretative case regarding contradictory jurisprudence on the issuance of protection orders under the Law on Domestic Violence Protection. The programme’s opinion is that orders should always be issued to protect victims of domestic violence, regardless of whether an earlier order has already been issued.

In November, a LDP representative was invited to a meeting organized by the Venice Commission (European Commission for Democracy through Law) with representatives of the NGO sector regarding the Minister of Justice’s question on the suitability of the Law on Amendment and Supplementation of the Code of Criminal Procedure to implement the ECtHR’s recommendations and to ensure the independence of the judiciary and effective investigation of the Attorney General.

Among the activities listed above, LDP recognizes the importance of advocacy as we believe that, although it does not lead to a change in the position of government in the short term, it serves as an opportunity for debate and the achievement of long-term goals. The topics selected for advocacy state the BHC’s position on important topics in public life.

4. TRAININGS AND CAMPAIGNS ON HUMAN RIGHTS

- **READI Project**

In 2019, LDP continued its work for the READI project. In the context of this work, LDP produced two books - an analysis of the case-law of the Law on Protection against Discrimination since its entry into force on cases of race and ethnicity discrimination, as well as a handbook on anti-discrimination law, adapted for use by both lawyers and non-lawyers.

LDP representatives were trainers during four seminars on anti-discrimination law for non-lawyers with representatives of the Roma community in the cities of Sofia, Kyustendil, Sliven and Vidin. Nearly 100 activists, lawyers and students participated in the seminars.

The trainings were intended to train and empower groups of marginalized communities. LDP will aim to provide similar human rights trainings outside Sofia in the future.

- **Trainings**

LDP representative was a speaker at a seminar organized by the Academy of European Law (ERA) on access to justice for people with disabilities and gender-based violence against people with disabilities, held in November 2019.

- **Joint Project with Liberties**

In 2019, Liberties launched a campaign called #StopSpyingOnUs against the so-called industry of Online Behavioral Advertising, Google and IAB Europe. The latter were the subject of complaints and alerts from a number of organizations to the relevant authorities in 15 different countries. LDP joined the campaign by signaling to the CPDP to carry out an investigation in the form of audits, to issue guidelines and best practices and to conduct a joint investigation with the involvement of supervisory authorities from other Member States. The decisions of the authorities in the different countries were similar, either refusing to take any action or referring the jurisdiction of the supervisory authority in Ireland. With this in mind, Liberties is considering a new strategy, including drafting and sending new complaints, which LDP will also be involved in.
5. COMPLAINTS SUBMITTED TO BHC

LDP provides legal assistance not only in the form of legal representation for cases of strategic importance, but also often provides legal advice to persons who have sent letters of request or alerts to the BHC.

In 2019, the BHC received more than 260 requests for legal aid and reports of irregularities. Over 165 of those have been reviewed.

REFUGEES’ AND MIGRANTS’ LEGAL PROTECTION PROGRAMME

In 2019, the BHC’s legal programme for the protection of refugees and migrants continued its activity, which began 23 years ago in 1994 with the support of the UN High Commissioner for Refugees. Since 2016, BHC’s work on the legal protection of refugees and migrants has also been supported by UNICEF with a focus on protecting unaccompanied migrant children. Programme activities include monitoring and evaluating the practice of conducting procedures for granting international protection and status on the territory of Bulgaria, monitoring of borders and administrative centers for the detention of foreigners regarding access to the territory of Bulgaria and procedure, including strategic cases before national courts, as well as monitoring and advocacy to protect unaccompanied children and protect them against unlawful detention.

The activities of the programme are aimed at establishing legal standards for the protection of refugees and respect for the fundamental rights of migrants, as well as for advocacy and lobbying for the creation legal and practical guarantees for the protection of fundamental human rights of aliens from all categories on the territory of Bulgaria.

In carrying out its activities and tasks, the programme is based on several permanent institutional agreements with the United Nations High Commissioner for Refugees (since 1994), with the State Agency for Refugees (since 1998), and with the Directorate-General for Border Police at the Ministry of Interior (since 2005) and with the Migration Directorate of the Ministry of Interior (since 2007) and the National Legal Aid Office (since 2017).

1. LEGAL ADVICE AND LEGAL AID REGARDING APPLICATIONS FOR PROTECTION AND ACCESS TO PROCEEDINGS

The programme was active in providing legal advice, interventions and representation to the administration through the permanent reception offices in its offices in Sofia and Svilengrad and through legal receptions at the registration and reception centers of the State Agency for Refugees in reception centres in Sofia (the Ovcha Kupel, Voenna Rampa, Vrazhdebna and PZT-3 Blok hostels), Harmanli, Banya and Pastorgor. Continuous border monitoring was carried out at the police detention facilities at the main border between Bulgaria and Turkey at the border checkpoints (Kapitan Andreevo, Novo Selo, Elhovo, Bolyarovo, Sredets, Malko Tarnovo), including Sofia airport.

Regularly and ad hoc, the main exit points were also observed with Serbia and Macedonia. On a weekly basis, we monitored the special homes for temporary accommodation of foreigners in Sofia, Busmantsi quarter and Lyubimets, Haskovo District at the Ministry of Migration Directorate. The programme also appealed the acts of the administration and ensured access to courts of asylum seekers and illegal migrants for the realization of their right to an effective remedy as well as pro bono representation before the regional
administrative courts and the Supreme Administrative Court in the cases of serious violations of material or procedural rights.

In 2019, in order to comply with the principle of non-refoulement under Article 33 of the Geneva Convention, the programme carried out 580 border visits and provided legal assistance for the submission of an application for protection at the land border and access to the territory of 675 seekers border protection, of which - 321 persons at the entry border and 254 persons at the exit border. The programme also monitored Dublin transfers to and from other EU Member States at Sofia International Airport in view of the right of the returned applicants to have access to a procedure for assessing their substantive request if they left the country to another EU Member State before their refugee procedure was completed in Bulgaria.

In 2019, the programme monitored compliance with the principle of access to a procedure under Art. 6 of the Procedural Directive from places of detention of illegal migrants, special homes for temporary accommodation of foreigners (Busmantsi and Lyubimets detention centers, part of the Migration Directorate of the Ministry of Interior). In the course of the year, the programme carried out 111 visits to such facilities (51 visits in Busmantsi and 60 in Lyubimets), as a result of which it was able to provide legal assistance for access to procedure of 1331 asylum seekers, of which 1042 men and 89 women, as well as 76 accompanying children and 136 unaccompanied children (133 boys and 3 girls) who were assisted in submitting an application for protection to the administration of immigration police.

During the year the two offices of the programme in Sofia and Svilengrad operated day-to-day legal receptions in which additional 1768 legal consultations were provided to 1651 persons, of which 333 consultations for registration and access to procedure, 1135 consultations at a certain stage of the procedure for granting international protection, 148 consultations on the rights and obligations of protection seekers and protected persons, 120 consultations on family reunification, 8 consultations on the acquisition of Bulgarian citizenship, and 24 consultations voluntary return.

The programme also monitored the procedures carried out by the State Agency for Refugees to comply with the basic minimum standards for assessing the application for protection and for granting international protection. The procedures for granting status in the refugee reception centres in Sofia, Banya, Harmanli and Pastorgor were observed. The programme monitored 595 procedural actions in international protection proceedings with regard to 424 men, 98 women, 31 accompanying children and 42 unaccompanied children. Of these, 375 are the procedures for assessing the application for protection before the administrative body and 131 lawsuits for complaints against refusals of protection. An assessment and analysis of 89 negative decisions of the administrative body was made. As a result, the Annual Report on the monitoring of the asylum procedure in 2019, which contains recommendations for improving the standards of refugee proceedings, has been drawn up.

2. CASES BEFORE THE ADMINISTRATIVE COURTS AND STRATEGIC LITIGATION

A total of 251 cases were filed before the administrative courts against negative decisions of the State Agency for Refugees, assessing the application for protection, of which 36 cases were brought before the courts. 17 cancellations were achieved, which represents a 47% success rate of all assisted appeals.

In 2019, the programme filed another 102 strategic cases addressing the following problem areas: 13 cases against unlawful
refusal of registration, 4 cases against unlawful detention in detention facilities after registration, 30 cases against conducting a refugee proceedings in immigration detention facilities, 8 cases against placement in closed-type refugee centers, 8 cases against non-admission to consideration of subsequent applications for protection, 5 cases against unjustified termination of granted international protection status, 13 cases against refusal to provide social assistance to a child and 20 cases against other miscellaneous violations of substantive or procedural law.

Thus, in 2019, the programme provided legal assistance, representation and consultation to a total of 3,947 beneficiaries, of which 1,343 individuals were granted access to territory and procedure (675 people at the border and 1,133 people at homes for temporary placement of foreigners), separately 36 unaccompanied children (58 unaccompanied children at the border, 81 unaccompanied children at detention facilities, and 36 children in proceedings), 1,044 persons for access to registration and during the process of granting international protection, 595 asylum seekers with monitored proceedings, 398 asylum seekers with a refusal to grant international protection, 249 final refused seekers protection in a procedure for voluntary return, 106 seeking protection in strategic cases, and 176 recognized refugees or persons with a humanitarian status, to a realization of their statutory social, health or other individual rights.

3. TRAININGS AND PUBLICATIONS

During the year, the programme participated in and conducted joint training with the UNHCR to train officers of the Border Police Directorate General and the Migration Directorate.

In 2019, the programme produced its traditional specialized reports - the Annual Border Monitoring Report and the Annual Report on Status Determination, containing recommendations to the government and relevant government bodies for specific measures, as well as proposals for amending and supplementing legislation. The programme drafted the annual review of the report on Bulgaria, published in the AIDA database (Asylum Information Database) of the European Council for Refugees and Exiles (ECRE).

In 2019, the programme employed 21 people, 9 of whom are certified attorneys.

CAMPAIGNS AND COMMUNICATIONS PROGRAMME

The main goal of the Campaigns and Communications Programme in 2019 was to effectively integrate the current requirements of the situation in Bulgaria as well as the donors into our work, in order to successfully communicate and present the work of the BHC. According to the developed communication strategy, the team developed activities in three parallel directions - work with the administration, work with the public and work with the media.

The focus of the Programme over the past year has been the implementation of several projects developing new communication opportunities to reach different audiences and the implementation of the campaigns planned for the year.
In 2019, the BHC was subjected to much more intense pressure than usual because of the conditional release of Australian national Jock Palfreeman. A campaign based entirely on fake or manipulative news was a serious reason to rethink the organization’s behavior in crisis communication.

A positive moment from last year were the successful efforts to improve partnerships with activists in working with vulnerable groups, other organizations in the liberal and human rights spectrum, as well as successfully established media partnerships.

1. INTERNET SITES, SOCIAL NETWORKS AND NEWSLETTER

In 2019, the BHC published 50 press releases, opinions and news related to the activities of the organization or human rights in general. There were 94,397 unique visits on the BHC’s official website last year, www.bghelsinki.org. Work was underway over the year to move to the new site, which will be ready in spring 2020.

In addition to the support of the organization’s current website, the BHC also maintains the sites of the Person of the Year Award, of Sofia Pride (organized by the BHC as a major partner). Two new READI sub-sites were launched during the year, http://readi.bghelsinki.org, and NO HATE BG, http://nohate.bghelsinki.org.

The Programme team distributes a monthly newsletter with news and information about the organization’s recent activities. The newsletter also publishes news about important, occurring or upcoming events in the human rights sector in Bulgaria and abroad. As of December 2019, the number of subscribers is 768 and additionally we send it out to the email addresses of another 425 media representatives, NGOs, state administration and embassies in Bulgaria.

BHC has its own profiles on four social networks: Facebook, Twitter, YouTube, LinkedIn. Our Facebook presence includes three pages: the organization in Bulgarian and English, as well as the page of the annual "Man of the Year" awards. In addition, as a partner in organizing the annual LGBTI equality procession, the Programme team also participates in the maintenance of Sofia Pride’s Facebook page.

A major goal on social networks is to generate our own visual content, including event photos, infographics and videos, to represent the topics we work on in a comprehensible language and reach more people.

From January 2019 to January 2020, BHC’s main Facebook profile in Bulgarian increased its number of followers from 11,954 to 13,064. In the last two months of 2019 alone, the Bulgarian site of the organization has engaged 2200 new Facebook users. The Facebook page created in 2016 is recognized as a source of English-language human rights news for users from Bulgaria and abroad. The number of its followers at the end of December 2019 was 2,574. The Man of the Year Awards page has 1,982 followers. In the last two months of 2019, the new users engaged were 1,200.

In 2019, the Programme team published a total of 401 posts across the three Facebook channels, 34 of which were copyrighted video content. The trend in Facebook shows that copyrighted videos have the highest audience reach and generate the most interest and reactions (likes, shares, clicks, comments, etc.). What caused the greatest interest this year regarding BHC was the photo published on July 2 of books sent to the office of the BHC by (then) Deputy Attorney General Ivan Geshev instead of him responding to the annual human rights report for 2018. The post was viewed by 34,290 unique Facebook users and every third of them (10,780) responded, commented or shared. The most watched video of the year is "Walk in Ganka’s shoes - 360° video", which had more than 15,000
views. It is the first such attempt by BHC to use VR technology in its video production. Twitter continues to be a much less popular social network in Bulgaria, but BHC’s profile is still very active and has an increase in followers, reaching 1,813 by the end of December 2019. BHC’s LinkedIn page has 233 followers as of December 2019. Our YouTube subscribers are 211.

2. COMMUNICATION WORK IN SUPPORT OF BHC PROJECTS

- **Project to encourage local support**
  The two-year OSI-funded project was one of the main priorities of the Programme during 2019. In February, a qualitative sociological survey of attitudes towards human rights among Bulgarian society was implemented (through discussions with 6 focus groups in three cities in the country), followed by a national representative survey of public attitudes towards human rights and the BHC. Based on the findings of the representative survey and through two smaller sociological surveys, the BHC tested several topics that identified high public sensitivity and a positive perception of human rights activities - domestic violence, the rights of persons with disabilities and the rights of children in institutions. Some of the new data related to public attitudes towards domestic violence were announced in a press release and on the BHC website and have been featured in a number of media outlets. Campaigns are to be launched in these areas, with an awareness campaign on the rights of older people with dementia planned by January 2020.

- **Mapping of murders of women in Bulgaria**
  At the beginning of 2019, the project “Mapping of the murders of women in Bulgaria”, whose main driver was the Monitoring Programme team, was finalized. The Programme contributed to the dissemination of project results, with 8 media appearances and nearly 40 publications in online publications. BHC disseminated the data with a visual campaign featuring 8 illustrations and infographics created specifically for the purpose of the project and inspired by the true stories of women killed at the hands of a partner or family member.

  The project was announced in the context of increased public attention to the problems of domestic violence and combating it, contributing to raising awareness of the specific dimensions of this crime in our country and the need to mobilize public resources to combat it. As one of the results of an active campaign, we can take into account the increased public expectations for the judiciary to implement more effective prevention and protection against domestic violence, resulting in a fourfold jump in the number of immediate protection orders issued in 2018, compared to the level of the previous two years. More information on [https://ubita.org/](https://ubita.org/)

- **Project READI**
  Within the READI project to increase the capacity to combat discrimination against the Roma minority, coordinated by the Programming and Administration Programme, a web site was developed with all training materials prepared within the project, as well as news, stories and videos on good practices of Roma integration in Bulgaria – [http://readi.bghelsinki.org](http://readi.bghelsinki.org). The Programme organized two mobile photography workshops for mixed groups of young people from different ethnic communities in Sofia and Kyustendil. In Kyustendil we worked with the local organization LARGO, whose team attracted participants from several Kyustendil schools. The workshops were led by the photographer Vera Gotseva and this experience proved that there are working
models for overcoming the obstacles to integration in the field of education. The differences between the young people were successfully overcome by working on common projects and tasks. More than 50 teenage children from Sofia and Kyustendil participated in the event. "The youngsters did not know each other but quickly worked together and did complex photographic tasks together. I always believed that children had no preconceptions and boundaries, that they were not divided by their ethnicity. And I was right - it is us, adults, who create divisions and we should pause and think about this." Vera Gotseva shared her thoughts about the experience. The Programme produced a video that tracks how the workshops went. The work that children produced together also became the basis for an interactive anti-discrimination booklet aimed at young audiences, A Handbook for Portraits and Friends - online, and a print edition. The book body was printed in 2000 copies. 1500 are distributed in the network of the Виж! magazine and the rest - in schools all over the country. A PDF of the edition can be found at the project site and on the BHC website. As part of the communication campaign, 5 videos, presenting good practices in the inclusion of children and young people from the Roma community, were created and disseminated. The videos „The Tundja Miracle”, „Together Over a Cup of Coffee”, „Learning to Dream” and „Desegregation in Vidin” (produced by the BHC partner the Drom - Vidin Association project) present good approaches and solutions for Roma integration. The videos, which we also translated into English, have been viewed thousands of times on social networks. The campaign ended with a petition to the Ministry of Education and the local authorities to take urgent action to desegregate Roma children in educational institutions. The petition has gathered the support of 300 people.

3. CAMPAIGNS

- **Voyvodinovo**
  At the beginning of 2019, a criminal incident involving representatives of the Bulgarian and Roma ethnic groups in the village of Voyvodinovo, Plovdiv, led to an escalation of interethnic tensions, which was further instigated and aided by official
institutions and led to villagers inflicting violence on Roma families not involved with the crime but living in the village. Throughout 2019, the Campaigns and Communications team facilitated the organization of a series of actions to assist the victims, a donation campaign to provide clothing and teaching aids for the beginning of the school year for children in one of the distressed families, as well as collecting a subscription on the ground in Plovdiv and online to support families; production and promotion of the video "Get into the shoes of Ganka", telling her story; accompanying and documenting a meeting of European Commissioner for Human Rights Dunya Mijatovic with one of the estranged families and others.

- **8th of March**

The BHC has become one of the organizations actively promoting around the world the month of March for combating women's equality and combating gender discrimination. Our team participated in the organization of the Women's Rights procession, a member of our team was a spokesperson on behalf of the BHC during the event, and we produced a thematic video distributed by all the organizations involved. Throughout March we also tend to present BHC’s activities in the field of women’s rights carried out over the past few years. More information on [http://bit.ly/womenbghelsinki2019](http://bit.ly/womenbghelsinki2019)

- **“See the Child”**

The campaign was dedicated to children who are at risk or have developed parental alienation syndrome. As part of the Bulgaria Donates initiative from January to March 2019, our team initiated a donation campaign to raise funds to promote the problem and the necessary harm reduction measures. For the purpose of the campaign, three infographics and four texts were created, representing the perspective of the parent concerned, the psychologist and the case lawyer. In the second stage, the Campaigns and Communications team became involved in the editing, realization and distribution of the children's book "For Little Yonji, With Huge Love", which tells the story of the child. The author is a mother wrongfully separated from her children, a client of the BHC Legal Defense Programme.


- **Sofia Pride**

As every year our team was part of the organizing committee of Sofia Pride. The traditional tasks were communication with the authorities, participation in meetings, organization of the stewards of the procession and safety of participants, specifying the route. We also regularly support the initiative’s online channels - site, Facebook page and YouTube channel. During our event, the BHC had its own bazaar stand where we sold our products made for specific campaigns.

- **BHC for the People**

„BHC for the People” is the title we chose for a long-term campaign, launched with the second video created by the Campaigns and Communications in collaboration with the Noble Graphics Advertising Team. The video presents five individuals assisted by the BHC. A special section of the organization’s website tells the full story of the characters featured in the video. The concept envisages the continuation of the storytelling of complainants or investigated cases encountered by the BHC team throughout 2020. The stories are distributed through our online channels and in partnership with dnevnik.bg with specially selected visions. Within the campaign, three media appearances were also realized.

- **Human of the Year 2019**

This year's Human of the Year awards went under the shadow of an active and aggressive campaign against the BHC and
human rights in general. The concept of the awards publicity campaign was driven by our desire to motivate people who continue to work in the field of human rights and, as well as to reverse the narrative of various extreme political and religious speakers, focusing on the ability of each citizen to nominate "their" Person/Human of the year. Our efforts to promote the awards focused on smaller organizations in Bulgaria, which are rarely the focus of public attention, but have made a huge contribution to maintaining and developing human rights in local communities. As a result, we received 44 nominations, 37 of which were eligible according to the announced criteria. The ceremony crowned a process of consolidation and good cooperation between workers in the sector. Significant was the complete absence of media representatives in the year in which the first prize of the Human of the Year was presented to journalists. The event was covered by a number of media outlets, with the publication of the press release and interviews with those who received awards and their stories. More information on http://www.humanoftheyear.org

4. CRISIS COMMUNICATION

In September, a panel of the Sofia Court of Appeals, headed by Judge Kalin Kalpakchiev, conditionally released on parole Australian Jock Palfreeman, who was convicted of the murder of student Andrei Monov in late 2007. This act led to an unprecedented attack on the court as an institution, the particular court and the Bulgarian Helsinki Committee, which was credited with illegitimately influencing the court’s case. This was done through a large-scale media campaign, based in part on the manipulative presentation of facts and in part on slander against the BHC. The hostile environment put the BHC in a crisis communication environment, in which the organization was the subject of great, but almost without exception negative media interest. It went as far as the ultra-nationalist VMRO-BND political party demanding that the BHC be banned. However, this political move led the BHC to seek, and fortunately - to receive - the support of many civil society actors who advocate human rights values. Within 48 hours at the request of the CC team and the initiative of the Bulgarian Donor Forum and the Marginalia Association, more than 100 Bulgarian and 42 international organizations stood up with letters in defense of the BHC, and the role of the civil sector as a whole in a democratic state. The case showed high potential for uniting civilians with diverse activities and interests around the protection of fundamental values and messages. For two months, the CC team collaborated with the BHC chairman and the LDP director to publicize three official positions of the organization, over 10 media appearances and dozens of informal conversations with representatives of the media and non-governmental organizations in order to preserve the image of the organization and uphold the rule of law in the context of the specific judgment and its consequences. The BHC was the non-governmental organization that had the clearest, categorical and systematic position on the role of the Attorney General in the Republic of Bulgaria, and the specific procedure for the election of a new Attorney General, held in the second half of 2019. Leading role in defending this position was played by the LDP, with the CC team supporting the editing and dissemination of positions and opinions produced by the legal team, coordinating media participation and communicating BHC activity among partner organizations. Timely and effective communication of the position of the legal team related to the activities of the Attorney General has significantly improved our media coverage in online publications with a well-established democratic focus and even in those with an inconsistent editorial policy.
5. PARTNERSHIPS

During the year, the Campaigns and Communications Programme repeatedly worked with various media to promote the activities of the BHC, such as establishing a long-term partnership with the site Dnevnik.bg. As part of the Communication Strategy for the 2019 Human of the Year Awards, the CC team attracted ten media partners, including radio, websites and print media: BNT, Mediapool.bg, Club Z, Marginalia, Mailko mila, Boyscout, Girls from Town, The Programme, See! Magazine и Seen.bg. Everyone posted information about the start of the nominations, and some placed banner ads and reflected the final event and the awards.

In March, within the framework of the annual Sofia Film Fest, we partnered with the organizers of the festival for their section "Kinofocus". The aim was to promote different aspects of the human rights theme through the presentation of three selected films in the festival programme, which were also the occasion for organizing thematic meetings and discussions on specific cases and topics. Here you can get acquainted with our partnership and the films we presented https://www.facebook.com/events/1457450684395948/.

In March, the BHC joined a team of organizations supporting the creation of a Fund for Supporting Women Victims of Domestic Violence. The CC team is committed to participating in the promotion of a fundraising campaign for the implementation of the Fund’s activities. The BHC is one of the organizers of the annual Sofia Pride together with the LGBT Action Youth Organization, the Resource Center - Bilitis Foundation and the GLAS Foundation, with whom we cooperate closely on various activities for the organization of the procession and the related cultural and sports events. The Programme team continues to maintain an active partnership with the Bulgarian Women’s Fund, with whom we work on a number of joint initiatives aimed at supporting leadership, protection against gender discrimination, prevention and protection against domestic violence. In 2019 the Campaign and Communications team attracted volunteer resources in the implementation of the See the Child campaign, the Voyvodinovo Children campaign at the beginning of the new school year, and the READI Photo Workshop.

6. FUNDRAISING FROM INDIVIDUAL DONORS

In recent years, the BHC has started developing activities to generate its own resources. The Programme is responsible for organizing donations and developing a product line that presents the initiatives and projects of the organization. In 2019, our efforts were focused on creating contacts and partnerships that would facilitate these two activities, increase team competence and expand the range of opportunities in this area. Profiles of the organization in the donation instruments DMS and platformata.bg were created and the partnership of the BDF and the BCause Foundation was ensured for drawing up internal rules for working with private donors.

The products manufactured at the moment are being promoted and sold through BHC’s Facebook page, as well as through bazaar stands. In 2019 BGN 1,600 came from donations for specific causes (See Child, Ready for School, Voivodinovo) and BGN 1,624 from sales (badges, cups, bags, colouring cards).
PROGRAMMING AND ADMINISTRATION

During the year, the Programming and Administration Programme was responsible for fundraising for the activities of the BHC (excluding the activities of the Programme for the Legal Protection of Refugees and Migrants). The main objective of the Programme is to provide continuous financing for the implementation of the activities envisaged for implementation in the BHC Long-Term Strategy 2018-2023 and the annual activity plans.

The Programme is also responsible for reporting the funding received and spent to the Bulgarian authorities and to the donors. In this activity, the Programme is guided by the BHC’s internal rules on spending, which is done under strict internal financial control, prevention of conflicts of interest, and the search for an optimal price / quality ratio for the purchase of goods and services for which as a norm we ask for three offers.

All annual financial statements of BHC are publicly available on our website and on the website of the Registry Agency.

Programming and Administration provides support to all BHC projects, and consists of general coordination, budgeting, administrative support, technical and logistical assistance, coordination of publication issues. Programme associates provide initial contact with complainants; contacts with journalists in connection with press releases or other publications. Our team plays a leading role in organizing and maintaining BHC public events, seminars and conferences.

1. FUNDRAISING AND MAIN DONORS IN 2019

The BHC operates with funding from European and international public and private donors. Of vital importance to our work are institutional donors - the Oak Foundation and the Open Society Foundation. This type of support allows the BHC to respond to a dynamic human rights environment and engage in strategic case management (not supported by the EU). Institutional support also allows us to raise additional funds from European Union funds for projects, providing compulsory co-financing of 20%. In 2019, the last institutional funding cycle of the Leon Levi Foundation ended. The Foundation has been supporting BHC since 2006.

In 2019, the BHC submitted a total of 16 project proposals (14 from the central office), individually or in partnership with other NGOs in various fields of work of the BHC in implementation of the Strategy for the Activity. Of these, 10 were approved, five were not approved (before the EU and a small local donor), and a major project proposal is expected to be approved. Thanks to its recognized expertise, integrity and high quality of project proposals, the BHC remains highly successful in having approved projects.

As a particular success in 2019, we consider the successful application to the Active Citizens Fund for the First Strategic Call for Proposals. The Programme played a leading role in the writing and submission of the project, supported by the Directorate General for Enforcement of Punishments and in partnership with the Ombudsman of the Republic of Bulgaria, won in a highly competitive environment. The project is in the area of reform in prisons, with a three-year duration and started in January 2020. Co-financing is provided by our institutional donors Oak Foundation and Open Society Foundations.

The successful completion of the first round of the Norwegian Financial Mechanism Regional Cooperation Fund is also a great success. The concept of the project was approved in large competition with a total of over 700 projects from across Europe at
the beginning of 2019. The project is a four-year project with a total value of EUR 1,297,000, again co-funded by the BHC’s institutional donors - the Oak and Open Society Foundations. The BHC Consortium is among only 40 consortia invited to develop and submit full project proposals for the second project round. The draft proposal was fully conceptualized by the BHC, attracting 7 leading European organizations as partners. The draft proposal envisages activities to improve the implementation of ECtHR decisions in Bulgaria, Russia, Ukraine, Hungary and Romania, with the expert support of the European Implementation Network and the European Prison Litigation Network. If approved, this will reinforce the organization’s leadership role among European human rights organizations and our work in monitoring the implementation of ECtHR decisions at national level. The project is under consideration (a decision is expected in 2020).

In 2019, thanks to the commitment of a member of the BHC General Assembly, we received funding for the first time from the National Endowment for Democracy, USA. The funding was awarded for a one-year period for a project aimed at consolidating the democratic community in Bulgaria and Northern Macedonia. It is expected to continue in 2020.

The biggest donors to the BHC in 2019 were the public donors to the United Nations High Commissioner for Refugees, the European Union, and the private donors to the Oak Foundation and the Open Society Foundations. The operating expenses in 2019 were BGN 1,423,000, which is an 8% decrease compared to 2018 (BGN 1,545,000). The decline comes mainly from the reduced funding from UNHCR and UNICEF for activities related to the asylum seeker protection procedure (36% reduction) and work with unaccompanied migrant children (18% reduction). The highest growth compared to the previous year is reported in the cost of projects funded by the European Union - an increase of 66% compared to 2018. BHC managed to maintain diversified funding, with no donor share exceeding 1/3 of the total financing.

For expenditure on different projects in 2019 is given in Table 1 below (p. 30). Thanks to the work of the Campaigns and Communications Programme to encourage
local donations, we started to offer materials and our know-how on fundraising for a cause, the proceeds of which are being earmarked for future campaigning activities.

2. ADMINISTRATION AND ACCOUNTABILITY

Programming and Administration is also responsible for accounting and reporting to Bulgarian authorities and international donors. Over the past year, the Programme has been responsible for the accounting and reporting of 8 projects under the European Union’s Justice, Rights, Equality and Citizenship and Erasmus Programmes, as well as at least five other institutional and smaller donor projects.

During the year, the Programme provided a transparent and rigorous account of the activities, revenues and expenditures of BHC to the Bulgarian financial institutions.

The Programme team also supports the work related to the legally authorized business activity of BHC Consulting, whose proceeds go to support the work of BHC.

In its work, the BHC has implemented a system of financial reporting and control at two levels. Current financial transactions are carried out under the control of an external accounting firm and, on the other, accountability is ensured by an independent financial audit, which has been carried out annually since 1998.

3. PROJECT WORK, ORGANIZATIONAL CAPACITY TRAINING

In addition to its core work, the Programme team participates in other activities of the organization - such as project coordination and fundraising training.

- **Project READI**

A large part of the Programme's resource in 2019 was dedicated to coordinating work on the READI project, which was jointly implemented by the BHC and three partner organizations in the country. In addition to coordinating the various BHC activities among the three Programmes, the Programme team regularly consulted our partner organizations on the financial and technical implementation of EU projects.

- **Project „Freedom of Speech Cannot Defend Itself”**

The Programme team also assists in the implementation of the project’s activities "Freedom of Speech Cannot Defend Itself" - posthumously publishing a book with publicized texts by Emil Cohen and organizing a public event at the Sofia University Aula and a documentary photo exhibition.

The engine of the project was Art Circle Movement, and support came from the Open Society Institute - Sofia.

- **Organizational training capacity**

In 2019, the Programme team conducted two organizational capacity trainings for the Drom Association for project writing and reporting. The trainings were held in Vidin in June and Sofia in November. The Campaigns and Communications Programme also participates in these training sessions to increase video advocacy and media capacity.
## 4. Project Funding Shares in 2019

The share of each donor in our total funding, on basis of activity expenditure in the period January 1 - December 31, 2019, is given in the table below:

<table>
<thead>
<tr>
<th>Donor</th>
<th>Supported Activity/Project</th>
<th>Expenditure in 2019 (EUR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>United Nations High Commissioner for Refugees</td>
<td>Monitoring the procedure for granting protection, advocacy and litigation to asylum seekers</td>
<td>229 163</td>
</tr>
<tr>
<td>Open Society Foundations</td>
<td>General Support BHC 2019 (Year 2) (co-financing)</td>
<td>149 937</td>
</tr>
<tr>
<td>Oak Foundation</td>
<td>General Support BHC 2019 (Year 1) (co-financing)</td>
<td>97 888</td>
</tr>
<tr>
<td>European Union</td>
<td>Expenditure on projects, as follows:</td>
<td>127 408</td>
</tr>
<tr>
<td></td>
<td>&quot;Together to Protect Minorities and Combat Hate Crimes&quot; (NO-HATE-BG)</td>
<td>45 582</td>
</tr>
<tr>
<td></td>
<td>&quot;Strengthening the capacity at regional level in the areas of anti-discrimination and integration &quot; (READI)</td>
<td>42 178</td>
</tr>
<tr>
<td></td>
<td>&quot;Harmonization of EU Standards of Detention&quot; (NPM-Standards)</td>
<td>16 324</td>
</tr>
<tr>
<td></td>
<td>„Combating Unconscious Prejudice and Discrimination of the Roma in the Criminal Justice System“ (ROMA)</td>
<td>9 775</td>
</tr>
<tr>
<td></td>
<td>Project „Effective legal aid in pre-trial detention “ (EFPTD)</td>
<td>7 681</td>
</tr>
<tr>
<td></td>
<td>Project „ Strengthening procedural rights in the criminal process “ (EUPRETRIALRIGHTS)</td>
<td>5 868</td>
</tr>
<tr>
<td>UNICEF</td>
<td>Monitoring the Situation of Unaccompanied Migrant Children</td>
<td>56 040</td>
</tr>
<tr>
<td>National Endowment for Democracy</td>
<td>Consolidation of the Liberal Democratic Community in Bulgaria</td>
<td>32 528</td>
</tr>
<tr>
<td>Open Society Foundations (FOSI)</td>
<td>Changing the Human Rights Narrative</td>
<td>16 323</td>
</tr>
<tr>
<td>Open Society Foundation - Sofia</td>
<td>Freedom of Speech Cannot Defend Itself</td>
<td>3 320</td>
</tr>
<tr>
<td>ECRE</td>
<td>Updating the Asylum Information Database</td>
<td>2 988</td>
</tr>
<tr>
<td>Robert Carr Fund</td>
<td>Medical Services, Drug Use and the Spread of HIV in Prisons in Bulgaria</td>
<td>2 153</td>
</tr>
<tr>
<td>Leon Levy Foundation</td>
<td>General support for the work of the Legal Defence Programme</td>
<td>2 127</td>
</tr>
<tr>
<td>Unrestricted funding, not connected to project funding</td>
<td>Expenses not budgeted elsewhere</td>
<td>7 523</td>
</tr>
</tbody>
</table>

**Total expenditure in 2019 in EUR:** 727 397
BOLD - BULGARIANS ORGANISING FOR LIBERAL DEMOCRACY

In 2019, the BHC launched a new project funded by the National Foundation for Democracy aimed at consolidating the liberal-democratic community in Bulgaria. During the first planning events, the group united around the name "Bulgarians Organising for Liberal Democracy" (BOLD).

Bulgarians Organising for Liberal Democracy (BOLD) is a BHC initiative that seeks to strengthen public support for democracy, human rights and the rule of law. BOLD’s internal communication, including decision-making on key policy topics, has been enhanced through the use of specially developed online platform for discussions, decision-making and broadcasting. External communication, aimed at increasing public support for human rights and other liberal-democratic values, takes the form of co-created innovative communication campaigns specific to each thematic position. BOLD’s campaigns include public events, social media posts, and working with allies on broader democratic topics. One of the main goals is to have a serious youth participation and to develop cooperation with international democratic networks.

During the first 9 months of its operations in 2019, BOLD managed to consolidate an initial group of like-minded people initial group of like-minded individuals, to establish relationships and partnerships with a wide range of formal and informal organizations, and to organize public events based on our public positions stated in our platform.

BOLD started its public events by celebrating its 30th anniversary on October 26, 1989 with a campaign on: «Let's celebrate the tradition of democratic participation in Bulgaria», insisting that the date of October 26 should be celebrated as the beginning of mass democratic civic participation that led to the fall of the communist regime.

In November 2019, BOLD held a series of panel discussions under the general title "Post-elections: Civil Participation in Local Government". In four thematic panels, representatives of democratic civic movements and organizations, as well as representatives of the academic community, discussed good practices and challenges in the interaction between citizens and local authorities.

In December 2019, BOLD started working on a campaign for family and family values, based on the position adopted through the online platform entitled “The Family: Protection and Support for the Family and the Child in a Democratic Society”.

PUBLICATIONS

Human Rights in Bulgaria in 2019

In May 2019, the BHC published its annual report on human rights in a circulation of 800. We sent out 750 copies to government and judiciary institutions, to representatives of the media, the academic community and the legal profession. MPs received the online edition of the report.

**Freedom of Speech Cannot Defend Itself**

"Freedom of speech cannot protect itself. We, the protesting citizens, must defend this most precious resource of democracy that the state and private media monopolies systematically stamp out. It is the cornerstone of all other civil liberties, when it exists - there is hope for change when it disappears - first comes timelessness, then "unanimity", then - prisons, concentration camps and "missing people"."

Emil Robert Cohen (1951–2018)
The book, published in November 2019, contains Emil Cohen’s nonfiction texts, published in various media from 2005-2019 on civil rights issues, as well as some of his theoretical developments and commentaries. It was published posthumously.

The book is distributed by East-West Publishing House.

**Guide on Making Portraits (and Friends)**

In December 2019, the BHC published a guide designed for young people to make portraits and friends. The manual, published in 2000 copies, is published under the READI project. It features materials from the hugely successful mobile photography training we conducted with mixed ethnic groups of students in Sofia and Kyustendil in October 2019.

The guide was distributed free of charge on the „Виж!“ magazine network. Available at: [http://readi.bghelsinki.org/resources/BHC-zine](http://readi.bghelsinki.org/resources/BHC-zine)

**Good practices for Combating discrimination against Roma**

The READI report presents examples of good practice - decisions of judicial and other authorities in cases of discrimination against Roma, as well as practical approaches aimed at eliminating systemic discrimination against Roma.

It aims to direct the efforts of national and European institutions to address these issues by demonstrating working approaches and models to overcome existing obstacles to Roma integration in education, employment, housing and health. It is also available in English.

Available at: [http://readi.bghelsinki.org/resources/Good-practices-report-integration](http://readi.bghelsinki.org/resources/Good-practices-report-integration)

The White Paper on access to justice for pre-trial detainees was also published, as well as Police Inside Detention 2: An Empirical Study of the Rights of Suspects and Charges in Criminal Investigation in Nine EU Countries.
BHC STAFF

Monitoring and Research Programme:

Antoaneta Nenkova (researcher), Dilyana Angelova (researcher), Krassimir Kanev (programme director), Slavka Kukova (researcher), Stanimir Petrov (researcher).

Legal Defense Programme:

Adela Kachaunova (legal director), Diana Dragieva, attorney-at-law, Iveta Savova, attorney-at-law, Radoslav Stoyanov (communications expert), Rilka Gergichinova (legal assistant).

Campaigns and Communications Programme:

Andrei Getov (multimedia producer), Bosilena Melteva (communications expert, interim director - from August), Milena Dimitrova (communications expert for NO HATE BG), Nadezda Tsekulova (communications director, on maternity leave), Radoslav Stoyanov (communications expert), Raya Raeva (communications expert - until July), Yana Buhrrer Tavanier (special projects consultant).

Programmefizing and Administration:

Vera Naydenova (accountant), Desislava Simeonova (programme director), Stamen Zdravkov (technical assistant), Severina Petkova (accountant clerk) and Teodora Veselina (technical assistant). The Accounting Firm "Zhelkova, Staneva and Georgiev" supervised BHC accounting.

Refugees and Migrants Legal Protection:

Antoaneta Dedikova (Legal Consultant), lawyer. Valentina Nielsen, lawyer. Georgi Voynov, Desislava Tiane (Legal Advisor), lawyer. Dimitar Slavov, Elitsa Sekulova (accountant), Zornitsa Chakarova (legal consultant), lawyer. Iliana Savova (Programme Director), Katya Dimitrova (Legal Advisor), lawyer. Mariana Andreeva, lawyer. Mariana Nikolova, lawyer. Martin Hristov, lawyer Plamen Zhelev, lawyer Plamen Bozhilov, the profilers Diana Hristova and Milen Hristov, as well as Hristo Adamov - for the refugee center in Harmanli and the transit center in the village of Pustrogor. In 2019 we worked with the translators Badran Jarus, Emilia Mihailova, Ibrahim Jaramadat, Ludmila Yaneva and Salahuddin Paktiaval

BOLD project:

Dimitrina Petrova (project manager), Vladimir Kolev (project coordinator), Alexandra Chankova (communication coordinator - from December).
GENERAL ASSEMBLY, EXECUTIVE COMMITTEE

GENERAL ASSEMBLY

BHC activities directed by the General Assembly.


EXECUTIVE COMMITTEE

The Executive Committee is entrusted with the organisation's operative management. Its members are elected by and from among the General Assembly with a two-year mandate.

The members of the Executive Committee (with a mandate March 2018 – March 2020) are: Krassimir Kanev, chair, Desislava Simeonova, deputy chair, Vulko Stanev, Ramadan Kehajov and Yana Buhrer-Tavanier.


Independent Auditor’s Report

Annual Financial Report

(attached below)
INDEPENDENT AUDITOR’S REPORT

TO

THE MEMBER OF ASSOCIATION BULGARIAN HELSINKI COMMITTEE

Opinion

We have audited the financial statements of BULGARIAN HELSINKI COMMITTEE (the Association), which comprise the balance sheet as at 31 December 2019, and profit and loss statement, equity statement and cash flow statement for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Association as at 31 December 2019, and its financial performance and its cash flows for the year then ended in accordance with National Accounting Standards (NAS) applicable in Bulgaria.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor’s Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company in accordance with the International Ethics Standards Board for Accountants’ Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) and the ethical requirements of the Independent Financial Audit Act that are relevant to our audit of the separate financial statements in Bulgaria. We have fulfilled our other ethical responsibilities in accordance with the IESBA Code and the ethical requirements of the Independent Financial Audit Act. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Information Other than the Financial Statements and Auditor’s Report Thereon

Management is responsible for the other information. The other information comprises the management report, prepared by management in accordance with Chapter Seven of the Accountancy Act, but does not include the financial statements and our auditor’s report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon, unless and to the extent explicitly specified in our report.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we
conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

**Additional Matters to be Reported under the Accountancy Act**

In addition to our responsibilities and reporting in accordance with ISAs, in relation to the management report, we have also performed the procedures added to those required under ISAs in accordance with the Guidelines of the professional organisation of certified public accountants and registered auditors in Bulgaria, i.e. the Institute of Certified Public Accountants (ICPA). These procedures refer to testing the existence, form and content of this other information to assist us in forming an opinion about whether the other information includes the disclosures and reporting provided for in Chapter Seven of the Accountancy Act applicable in Bulgaria.

**Opinion in connection with Art. 37, paragraph 6 of the Accountancy Act**

Based on the procedures performed, our opinion is that:

a) The information included in the management report referring to the financial year for which the financial statements have been prepared is consistent with those financial statements.

b) The management report has been prepared in accordance with the requirements of Chapter Seven of the Accountancy Act.

c) The report on payments to governments referring to the financial year for which the financial statements have been prepared is provided and prepared in accordance with the requirements of Chapter Seven of the Accountancy Act.

**Responsibilities of Management for the Financial Statements**

Management is responsible for the preparation and fair presentation of the financial statements in accordance with NAS applicable in Bulgaria and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Association’s ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Association or to cease operations, or has no realistic alternative but to do so.

**Auditor’s Responsibilities for the Audit of the Financial Statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor’s report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.
As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

✓ Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

✓ Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Association's internal control.

✓ Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

✓ Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Association's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Association to cease to continue as a going concern.

✓ Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with management regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Registered Auditor in charge: DEYAN KONSTANTINOV

30 March, 2020
Sliven, Bulgaria
Association Bulgarian Helsinki Committee

FINANCIAL STATEMENT
AS AT 31.12.2019

INDEPENDENT AUDITORS' REPORT

Representatives:
Krassimir Kanev

Prepared by:
Alexander Georgiev
for Zhelkova, Staneva
and Georgiev -
accounting office Ltd.

Audited by:
Konstantinov Audit Ltd

Date of approval of the financial statement:
Sofia, 27 March 2020
# PROFIT AND LOSS STATEMENT
from business activity
Association Bulgarian Helsinki Committee
for the year 2019

<table>
<thead>
<tr>
<th>Name of costs</th>
<th>Amount (thousands)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current year</td>
<td>Previous year</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>A. EXPENSES</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Other expenses, incl.:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Carrying value of assets sold</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Total expenses from operating activities</td>
<td>1</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Total expenses from ordinary activities</td>
<td>1</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>B. REVENUES</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Net sales revenue:</td>
<td>3</td>
<td>24</td>
<td></td>
</tr>
<tr>
<td>- Goods</td>
<td>1</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>- Services</td>
<td>2</td>
<td>22</td>
<td></td>
</tr>
<tr>
<td>Total income from operating activities</td>
<td>3</td>
<td>24</td>
<td></td>
</tr>
<tr>
<td>Total income from ordinary activities</td>
<td>3</td>
<td>24</td>
<td></td>
</tr>
<tr>
<td>Total income</td>
<td>3</td>
<td>24</td>
<td></td>
</tr>
<tr>
<td>Total (Total income)</td>
<td>3</td>
<td>24</td>
<td></td>
</tr>
</tbody>
</table>

Date of approval of the financial statement:
Sofia, 27 March 2020

Prepared by:
Alexander Georgiev
for Zheikova, Staneva
and Georgiev - accounting office Ltd.

Representatives:

Деян Константинов

Заберил съгласно осигурен финансиален план
3 0 -03- 2020
Ревизиран от:\
Деян Константинов
0652\ REGISTERED PUBLIC

Деян Константинов
# PROFIT AND LOSS STATEMENT
from non business activity
Association Bulgarian Helsinki Committee
for the year 2012

<table>
<thead>
<tr>
<th>Name of costs</th>
<th>Amount (thousands)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current year</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>I. OPERATING EXPENSES</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Administrative costs</td>
<td>1,153</td>
<td>1,835</td>
<td></td>
</tr>
<tr>
<td>Total I</td>
<td>1,153</td>
<td>1,835</td>
<td></td>
</tr>
<tr>
<td>II. Financial Expenses</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Negative exchange differences</td>
<td>2</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>6. Other financial expenses</td>
<td>4</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Total II</td>
<td>6</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>V. Total expenses</td>
<td>1,159</td>
<td>1,842</td>
<td></td>
</tr>
<tr>
<td>VI. Result</td>
<td>147</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>1,306</td>
<td>1,942</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of revenues</th>
<th>Amount (thousands)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current year</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>I. OPERATING REVENUE</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Revenue of regulated activities</td>
<td>1,298</td>
<td>1,821</td>
<td></td>
</tr>
<tr>
<td>1. Revenues from donations under condition</td>
<td>1,298</td>
<td>1,821</td>
<td></td>
</tr>
<tr>
<td>3. Membership fees</td>
<td>2</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>4. Other income</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Total I</td>
<td>1,301</td>
<td>1,823</td>
<td></td>
</tr>
<tr>
<td>II. Financial income</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Other interest and financial income, incl.:</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Positive exchange differences</td>
<td>3</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total II</td>
<td>3</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>IV. Profit from business activity</td>
<td>2</td>
<td>19</td>
<td></td>
</tr>
<tr>
<td>V. Total income</td>
<td>1,306</td>
<td>1,942</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>1,306</td>
<td>1,942</td>
<td></td>
</tr>
</tbody>
</table>

Date of approval of the financial statement:
Sofia, 27 March 2020

Prepared by:
Alexander Georgiev
for Zhelkova, Staneva
and Georgiev -
accounting office ltd.

Representatives:
Krasimir Kanev

[Signature]

Забележка: съгласно законодателство
Забележка: съгласно законодателство

Регистриран оумор:
Деян Константинов

0652 Деян Константинов
Регистриран оумор
**EQUITY STATEMENT**  
Association Bulgarian Helsinki Committee  
as at 2019

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Reserves</th>
<th>Current profit/loss</th>
<th>Total equity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Other Reserves</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Balance at the beginning of the reporting period</td>
<td>297</td>
<td></td>
<td>297</td>
</tr>
<tr>
<td>6. Financial result of the current period</td>
<td>-</td>
<td>147</td>
<td>147</td>
</tr>
<tr>
<td>10. Other change in equity</td>
<td>147</td>
<td>(147)</td>
<td>-</td>
</tr>
<tr>
<td>11. Balance at end of reporting period</td>
<td>444</td>
<td>-</td>
<td>444</td>
</tr>
<tr>
<td>13. Equity at end of reporting period</td>
<td>444</td>
<td>-</td>
<td>444</td>
</tr>
</tbody>
</table>

Date of approval of the financial statement:  
Sofia, 27 March 2020

Prepared by:  
Alexander Georgiev  
for Zheikova, Staneva  
and Georgiev - accounting office Ltd.

Representatives:  
Krassimir Kanev

[Signature]

Заберил съгласно одобрения голям  
3 0-03- 2020  
Ревизиран одобрение:  
Деян Константинов  
0652 Константинов  
[Signature]
## CASH FLOWS STATEMENT

**Association Bulgarian Helsinki Committee**

for the year 2019

<table>
<thead>
<tr>
<th>Title of cash flows</th>
<th>Current year</th>
<th>Previous year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>I. Cash at the beginning of the period</td>
<td>1 047</td>
<td>592</td>
</tr>
<tr>
<td>II. Cash flows from non-profit activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Inflow (cash) from non business activity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Revenues from donations under condition</td>
<td>1 279</td>
<td>1 977</td>
</tr>
<tr>
<td>3 Proceeds from membership fees</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>6 Proceeds from bank and currency operations</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>7 Other proceeds</td>
<td>20</td>
<td>7</td>
</tr>
<tr>
<td>Total inflow (cash) from non business activity</td>
<td>1 303</td>
<td>1 985</td>
</tr>
<tr>
<td>B. Outflow (cash) for non business activity</td>
<td></td>
<td></td>
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<td>1 Paid donations</td>
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<tr>
<td>2 Paid wages</td>
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</tr>
<tr>
<td>3 Paid insurance obligations</td>
<td>131</td>
<td>127</td>
</tr>
<tr>
<td>4 Paid bank and currency operations</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>5 Paid services</td>
<td>1 022</td>
<td>1 166</td>
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<tr>
<td>6 Other payments</td>
<td>46</td>
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<tr>
<td>Total outflow (cash) for non business activity</td>
<td>1 521</td>
<td>1 552</td>
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<tr>
<td>B. Net cash flow from non business activity</td>
<td>(218)</td>
<td>433</td>
</tr>
<tr>
<td>III. Cash flows from business activity</td>
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<td></td>
</tr>
<tr>
<td>A Inflow (cash) from business activity</td>
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</tr>
<tr>
<td>2 Revenues from clients</td>
<td>2</td>
<td>27</td>
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<tr>
<td>4 Other proceeds</td>
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<td>Total inflow (cash) from business activity</td>
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<tr>
<td>B Outflow (cash) for business activity</td>
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<tr>
<td>2 Payments to suppliers</td>
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<td>3</td>
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<tr>
<td>3 Paid taxes</td>
<td>2</td>
<td>3</td>
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<tr>
<td>5 Other payments</td>
<td>10</td>
<td>5</td>
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<tr>
<td>Total outflow (cash) for business activity</td>
<td>12</td>
<td>11</td>
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<tr>
<td>B. Net cash flow from business activity</td>
<td>(10)</td>
<td>22</td>
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<tr>
<td>IV. Cash at the end of the period</td>
<td>819</td>
<td>1 047</td>
</tr>
<tr>
<td>V. Change in cash during the period</td>
<td>(228)</td>
<td>455</td>
</tr>
</tbody>
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Prepared by:
Alexander Georgiev
for Zhelkova, Staneva and Georgiev - accounting office Ltd.

Representatives:
Krassimir Kanev

Date of approval of the financial statement:
Sofia, 27 March 2020
<table>
<thead>
<tr>
<th>Assets Divisions, groups, articles</th>
<th>Amount (thousands)</th>
<th>Liabilities Divisions, groups, articles</th>
<th>Amount (thousands)</th>
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<tbody>
<tr>
<td></td>
<td>Current year</td>
<td>Previous year</td>
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<td>B. Non-current (fixed) assets</td>
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<td>A. Own capital</td>
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<td>iii. Long-term financial assets</td>
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<td>4. Other Reserves</td>
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<td>Total IV:</td>
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<td>Total for section B:</td>
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<td>Total for section A*:</td>
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<td>C. Current (short term) assets</td>
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<td>B. Obligations</td>
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<td>4. Payables to suppliers, including:</td>
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<td>3. Production and goods including:</td>
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<td>11</td>
<td>- up to 1 year</td>
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<tr>
<td>- goods</td>
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<td>11</td>
<td>8. Other liabilities, including:</td>
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<td>- up to 1 year</td>
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<td>II. Claims</td>
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<td>13</td>
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<td>Insurance obligations, including:</td>
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<td>Total II:</td>
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<td>- up to 1 year</td>
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<td>Tax liabilities, including:</td>
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<tr>
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<td>- up to 1 year</td>
</tr>
<tr>
<td>- unlimited accounts (deposits)</td>
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<td>1 035</td>
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</tr>
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<td>Total IV:</td>
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<td>- up to 1 year</td>
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<td>Total for section C:</td>
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<td>1 078</td>
<td>r. Grants and income for future periods, including:</td>
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<td>D. Expenses for future periods</td>
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<td>335</td>
<td>- financing</td>
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<td>AMOUNT OF ASSETS</td>
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<td>1 414</td>
<td>AMOUNT OF LIABILITIES</td>
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</table>

Date of approval of the financial statement: Sofia, 27 March 2020

Prepared by: Alexander Georgiev
for Zheikova, Staneva
and Georgiev - accounting office Ltd.

Representatives: Krassimir Kanev

Заверил съгласно огледален съдържател 3 0 -03- 2020
Ревизиран огледален съдържател: Двюн Константинов

0652 Константинов

Регистриран огледален съдържател.