2018 Annual Activity Report
Bulgarian Helsinki Committee

Sofia, March 2019
ABOUT US

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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Contents

MONITORING AND RESEARCH ........................................................................................................... 5
  WORK IN STRATEGIC HUMAN RIGHTS SPHERES ........................................................................... 5
  MONITORING STRATEGIC HUMAN RIGHTS SPHERES ................................................................. 8
  ALTERNATIVE REPORTS TO INTERNATIONAL HUMAN RIGHTS TREATY BODIES .................. 9
  ADVOCACY ..................................................................................................................................... 10
  LITIGATION BEFORE THE EUROPEAN COURT OF HUMAN RIGHTS ........................................... 10

STRATEGIC LITIGATION AND LEGAL ADVOCACY ...................................................................... 11
  DOMESTIC LITIGATION .................................................................................................................... 11
  STRATEGIC LITIGATION BEFORE THE EUROPEAN COURT ON HUMAN RIGHTS ....................... 14
  OPINIONS ON DRAFT ACTS, ASSESSMENT OF IMPLEMENTATION OF ECtHR JUDGMENTS ....... 15
  ROMA ENPOWERMENT FOR ANTIDISCRIMINATION AND INTEGRATION PROJECT ............. 16

LEGAL PROTECTION OF REFUGEES AND MIGRANTS ................................................................. 16
  LEGAL CONSULTATIONS, BORDER MONITORING ......................................................................... 17
  MONITORING OF THE PROCEEDINGS FOR INTERNATIONAL PROTECTION, LITIGATION ..... 18
  SPECIALISED REPORTS, TRAININGS IN REFUGEE LAW ............................................................. 19

CAMPAIGNS AND COMMUNICATIONS ACTIVITIES ....................................................................... 19
  INTERNET SITE, ELECTRONIC BULLETIN ..................................................................................... 20
  SOCIAL MEDIA PROFILES ............................................................................................................... 20
  CAMPAIGNS IN 2018 ........................................................................................................................ 20
  HUMAN OF THE YEAR ANNUAL AWARDS ..................................................................................... 22
  INDIVIDUAL FUNDRAISING ............................................................................................................ 23
  OTHER PROJECTS AND CAMPAIGNS ............................................................................................... 24

ADMINISTRATION, DONORS AND EXPENDITURES ..................................................................... 24
  ADMINISTRATION AND ACCOUNTABILITY ..................................................................................... 25
  FUNDRAISING AND DONORS IN 2018 ........................................................................................... 25

REPORTS AND OTHER PUBLICATIONS IN 2018 .......................................................................... 27
  BHC STAFF ...................................................................................................................................... 29

GENERAL ASSEMBLY, EXECUTIVE COMMITTEE ........................................................................ 29
  GENERAL ASSEMBLY ....................................................................................................................... 29
  EXECUTIVE COMMITTEE ................................................................................................................. 29

AUDITOR’S REPORT, FINANCIAL REPORT AS AT 31.12.2018 ..................................................... 30
During the year, the Bulgarian Helsinki Committee (BHC) carried out its activities through its five permanent programmes - Monitoring and Research Programme, Legal Defense Programme, Refugees' and Migrants' Legal Protection Programme, Campaigns and Communications and Programming and Administration.

In 2018, these programs implemented the broad range of activities the BHC was engaged in through monitoring in priority areas, preparation of human rights reports to key public authorities, strategic litigation before the Bulgarian courts, the Commission for Protection against Discrimination and the European Court of Human Rights in Strasbourg, legal advocacy through provision of expert opinions, monitoring of case law and publishing training manuals.

Activities were complemented by public campaigns aimed at giving additional visibility and engaging in civic awareness and attention to human rights issues. The organization published publications and special reports. In parallel, fundraising activity was developed through the creation of cause-related materials, such as the Women's Rights Thematic Booklet and the Narvale Party comic book, which can be purchased from the organisation's online platforms. All income from these activities is directed to BHC activities.

### MONITORING AND RESEARCH

In 2018, the Monitoring and Research Programme worked in five areas: projects in strategic area of human rights, monitoring in priority areas related to the BHC Strategy, preparation of reports to international human rights bodies, advocacy and cases before the European Court of Human Rights in Strasbourg.

#### WORK IN STRATEGIC HUMAN RIGHTS SPHERES

**First mapping of cases of femicide in Bulgaria**

In 2018, BHC made the first mapping of the murders of women in Bulgaria. The map was developed under the project "Mapping the murders of women in Bulgaria", supported by the International Women’s Club - Sofia, the goal of which was to support the systematic documentation and disclosure of cases of female murders, and in particular the cases that could be defined as femicide; to help identify the risk factors accompanying the killings; to support the development of effective measures and legislation necessary to prevent the murder of women; to commemorate the women-victims of murder.

Within the framework of the project we developed a special interactive site with a map of murders, [www.ubita.org](http://www.ubita.org), with a database of 141 first-instance sentences in women's murders in 2012-2017. The platform will be upgraded in 2019. The survey provided statistics on the context in which the crimes are committed, the history of the violence preceding the murder, the characteristics of profiles of perpetrators and the victims.

![Illustration: Andrea Leoni](image-url)
The BHC statistics from the mapping of femicide in Bulgaria was used as a motive for the introduction of amendments in the Penal Code for voting in Parliament connected with protection from domestic violence.

Dilyana Angelova worked on the project.

**Project “Strengthening court protection of fundamental rights of persons under detention in the EU”**

In 2018 BHC continued work on the project “Strengthening the judicial protection of the fundamental rights of prisoners in custody in the EU”, realized jointly with the European Advocacy Network for prisoners, European universities and non-governmental organizations from ten European countries. The project focuses on the protection of fundamental rights and access to legal aid for detainees in the European Union.

As part of the project, a conference was organized at the European Court of Human Rights in Strasbourg. During the event Krasimir Kanev, BHC Chair, made a critical review of the penitentiary reform in Bulgaria, triggered by the pilot judgment *Neshkov and Others v Bulgaria*. Among the highlights of the presentation were the problems with the implementation of the newly introduced procedures for prevention of torture and inhuman treatment in prisons and arrests and the determination of monetary compensation to the victims of such treatment, the single isolation of prisoners, life imprisonment without substitution, the existence of a single prison for women in the country. The conference was opened by the ECHR President, Judge Guido Raimondi.

Dilyana Angelova and Krassimir Kanev worked on the project.

**Project “Strengthening Procedural Rights in the Criminal Process: effective access to a lawyer/legal aid in the accordance with the Stockholm Programme of the European Council”**

The two-year project "Strengthening Procedural Rights in Criminal Proceedings", with the BHC as leading organisation was implemented with NGO partners from Hungary, Slovenia, Lithuania and Poland.

The project results were presented at an international conference in March 2018 in Sofia. Articles and reports created in the framework of the project were published in two editions of the Supreme Bar Council’s *Advokatski Pregled* magazine.

Dilyana Angelova and Krassimir Kanev worked on the project.

**Project “Fighting unconscious bias and discrimination of Roma in the criminal justice system”**

In November 2018, BHC started work on a two-year project "Fighting Unconscious Bias and Discrimination of Roma in the criminal justice system", co-funded by the European Union with the leading...
organization Fair Trials - Europe. The objectives of the project include: raising awareness of how negative stereotypes and social attitudes against Roma contribute to their overrepresentation in the criminal justice system; developing and implementing strategies to improve fairness and non-discrimination in making discretionary decisions by police officers, prosecutors, judges in criminal proceedings, and identifying and sharing good practice worldwide.

The project activities are implemented by Dilyana Angelova.

Project “My lawyer, my rights”

In the first half of 2018, the Monitoring and Research Programme continued its work on this international project co-funded by the European Union and implemented jointly with partner organisations from Belgium, Ireland, Italy, the Netherlands and Poland, focusing on children's rights in conflict with the law.

BHC issued two manuals – „Practical manual for lawyers: how to protect a child in conflict with the law?“ and „Handbook for member states – how to guarantee the rights of children in conflict with the law.“

We also organized 11 information meetings for presentation of the manuals with civil servants from ministries, Academy of the Ministry of the Interior, the State Agency for Child Protection, the Agency for Social Assistance and MPs. At the end of July BHC carried out a final seminar with lawyers, NGO activists, Ombudsman, UNICEF, judges, law enforcement officials. The international standards and problems relating to legal defense for children in conflict with the law were discussed at the meetings.

Slavka Kukvoa and Antoaneta Nenkova worked on the project.

Project “Strengthening procedural rights of people with mental impairments in the criminal process”

In the spring of 2018, BHC, together with partner organisations from Austria, Slovenia, the Czech Republic and Lithuania, participated in the development and issued a Handbook on Strengthening Procedural Rights for People with Psychosocial and/or Intellectual Disabilities in the Criminal In Procedure Process,  Dignity in Trial. 3

At a conference in June the project results and findings of the national survey were presented.

The project activities were implemented by Slavka Kukova.

Project “Effective legal aid in pre-trial detention”

In July 2018, BHC drew up a report on the main problems in the law and practice of providing lawyer protection in pre-trial detention and an action plan. In the autumn of 2018, BHC held a working group meeting to discuss the action plan, two videos of lawyers were produced, explaining the main problems in providing lawyer protection to detainees in the police. The Action Plan and the main issues were also discussed at the round tables organized jointly with the Police Inside Custody Project in October and November 2018, attended by civil servants, judges,

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prosecutors, lawyers and translators. In 2019, a manual will be issued and its presentation to lawyers.

The project activities were implemented by Slavka Kukova.

**Project “Inside Police Custody”**

In 2018, BHC worked on the Police Inside Custody Project. At the beginning of the year we conducted interviews with 21 accused persons at a Sofia pre-trial detention centre, as well as interviews with lawyers and police officers on issues of police detention. In the autumn, we organized thematic round tables for the presentation of parts of the national report to representatives of the competent institutions on "The right to access to a lawyer and legal assistance during police detention" (in Sofia) and "The right to interpretation and translation information during police detention" (in Plovdiv). The final event of the project, round table "Presentation of an empirical study on the rights of suspects and accused persons in the investigation in the criminal proceedings in eight EU countries - National Report on Bulgaria" took place in December in Sofia. The study report was circulated to the Ministry of the Interior and all other interested institutions and posted on the BHC website.

Stanimir Petrov and Krassimir Kanev worked on the project.

**Project “Human Rights Guide in Bulgaria”**

The project aims to create the first comprehensive guide on human rights in Bulgarian. It is coordinated by the Baltic Society for Human Rights, based in Riga, Latvia, and is being implemented in partnership with two other organizations from Latvia and Estonia.

The Monitoring and Research Programme has developed several topics in the manual - the right to personal freedom and security, the right to a fair trial, the rights of prisoners, the rights of people with psychosocial disabilities in forced and compulsory accommodation and treatment in psychiatric establishments. In addition, several other topics, including the right to freedom of expression, national and international mechanisms for the protection of human rights, as well as the common parts of the leadership, were developed together with Campaign and Communications program contributors. Managing work continued throughout 2018 and was completed in early 2019. The text of the project site and its official promotion in May 2019 in Sofia is forthcoming.

Krasimir Kanev, Dilyana Angelova and Slavka Kukova worked on the project from the Monitoring and Research Programme, and from Campaigns and Communications Program - Yana Buhrer-Tavanie, Radostina Georgieva and Raya Raeva.

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**MONITORING STRATEGIC HUMAN RIGHTS SPHERES**

During the year significant work on human rights monitoring in Bulgaria was carried out in connection with the preparation of the 2017 annual human rights report. A large number of information was collected under the Access to Public Information Act and visits were made to a number of institutions and services.

BHC researchers visited prisons, prison hostels and pre-trial detention centres, as well as institutions for children in conflict with the law - CBS and SBS. At the beginning of February 2018, we carried out visits to four prisons (Vratsa, Pazardjik, Stara Zagora, Lovech), where prisoners were interviewed about their rights during police detention. The material conditions in these prisons and heard complaints of prisoners were also observed.
In the last three years access of BHC researchers to homes for medical and social care for children has been restricted by the Ministry of Health. BHC can also not monitor another group of institutions managed by the Ministry of Health - the psychiatric hospitals. BHC did not receive access to alternative services in the community for children and adults in 2018. Despite the barriers to human rights monitoring, BHC continued in 2018 its commitment to protect the rights of people with mental disorders, and by field observations. Together with the international organisation Validity, as well as independently, BHC teams carried out visits to several social care homes for adults with mental disabilities. A home for the elderly in Sofia was also carried out, following complaints received from clients therein.

In 2018, BHC carried out an interdisciplinary study in 66 small group homes for children with disabilities across the country. BHC monitoring focused on the conditions of accommodation, activities, care, ill-treatment and health care for children and adolescents accommodated. The main conclusion from the observation was that the social exclusion of children with disabilities continues in the new services. Interdisciplinary research also finds that material and human resources are not adequate to the needs. A multiplication of institutional stereotypes in the most inhumane and unacceptable forms was also recorded in the facilities.

A significant amount of monitoring work was also carried out in connection with the preparation of the alternative BHC reports to international human rights treaty bodies.

Monitoring activities during the year were performed by Antoaneta Nenkova, Stanimir Petrov, Dilyana Angelova, Slavka Kukova and Krassimir Kanev.

**ALTERNATIVE REPORTS TO INTERNATIONAL HUMAN RIGHTS TREATY BODIES**

In 2018, BHC prepared two alternative reports to key international human rights bodies - reviewing the obligations under the International Covenant on Civil and Political Rights before the UN Human Rights Committee and reviewing the obligations under the International Covenant on Civil and Political Rights. economic, social and cultural rights before the UN Committee on Economic, Social and Cultural Rights.

The BHC report before HRC⁴ was drafted in two formats – complete version to nearly 120 pages and executive summary in 25 pages - and provided information in 15 areas outlined by the list of preliminary issues. These areas are the expression of hatred, equality between men and women, LGBTI rights, disability rights, protection against torture and ill-treatment, treatment of migrants, discrimination and minority rights, right to freedom of conscience and religion, and others. In October Krassimir Kanev met with the members of the committee and participated in the review session.

The report of the BHC before the CESCR⁵ focused on poverty and social exclusion, access to healthcare for minorities, people with disabilities and LGBTI, integration of Roma, evictions of Roma from only homes, access to education for Roma and people with disabilities, migration asylum, gender

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⁴ Available online at: https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/BGR/INT_CCPR_CSS_BGR_32171_E.pdf

equality, deinstitutionalisation of care for children and others. In February 2019 Krassimir Kanev took part in a videoconference with members of the Committee.

The alternative reports before international bodies were prepared by Krassimir Kanev and Slavka Kukova.

ADVOCACY

Participation in working groups and networks

An important catalyst for the process of deinstitutionalization of children and the elderly was the bill on social services submitted to the Parliament at the end of 2018. For the first time in a Bulgarian law, deadlines were set for the closure of institutions for children and adults: by 2021 - for all children’s homes and by 2035 for all homes for disabled persons. The BHC took an active part in the broad consultative process in the drafting of the legislative proposal - Antoaneta Nenkova was a member of the working group of experts, created by an order of the Minister of Labor and Social Policy, Biser Petkov.

In 2018 the BHC supported with its expertise the State Agency for Child Protection in drafting of the new National Strategy for the Child 2019-2030. The National Strategy was presented for public discussion at the end of December 2018. The period until 2030 is key to completing successful deinstitutionalization process and further reduce the number of children separated from their families. And the draft National Strategy for the Child, made at the end of 2018, implies this. In February 2019, the BHC joined the Childhood Coalition 2025 organizations, which supported the new strategy for the child.

In 2018 the participation of a BHC expert in the European Network of European Disability Experts on the European Commission continued. In January-March, Slavka Kukova prepared a disability assessment study, in April - updated the database on compliance with the United Nations Convention on the Rights of Persons with Disabilities (DOTCOM) in Bulgaria, in the summer - developed a scorecard for meeting the EU2020 objectives in the field education, employment, social inclusion and poverty reduction, and work at the end of the year on the study of respect for the right to independent living for people with disabilities and the process of deinstitutionalization.

Antoaneta Nenkova, Stanimir Petrov, Slavka Kukova, Dilyana Angelova and Krassimir Kanev worked in the sphere of advocacy during the year.

LITIGATION BEFORE THE EUROPEAN COURT OF HUMAN RIGHTS

In 2018, the European Court of Human Rights delivered five judgments in cases where the applicants were represented by the BHC’s Monitoring and Research Programme. They include:

- Yordan Ivanov and Others v Bulgaria. The case concerns the refusal of the Bulgarian authorities to register the organization UMO Ilinden.
- UMO Ilinden and Others v Bulgaria. The case concerns the refusal of the Bulgarian authorities to register the organization UMO Ilinden.
- Kiril Ivanov v Bulgaria. The case concerns the violation of the right to peaceful assembly by a Macedonian organisation.
Hadjieva v Bulgaria. The case concerns the violation of the right to personal and family life of a minor after the arrest of the child’s parents for extradition to Turkmenistan.

Furtunova v Bulgaria. The case concerns the violation of the right to access to a court for appeal of a fine.

On account of its innovative nature, Hadjieva v Bulgaria was included in the ECtHR 2018 Key Cases.

Strategic Litigation and Legal Advocacy

The BHC Legal Defense Programme (LDP) conducts strategic litigation cases before the Bulgarian and international courts and the Commission for Protection against Discrimination (CPD). The program engages in legal advocacy through opinions on interpretative and constitutional matters at the invitation of Supreme Courts and the Constitutional Court, submits third-party cases before the European Court of Human Rights (ECtHR), participates in working groups for drafting draft laws and opinions on draft acts to the National Assembly. LDP participates in the production of reports and monitors the equality body and court case-law under the Protection Against Discrimination Act.

In 2018, the Legal Defense Programme discontinued work on pre-trial proceedings and files relating to the 2010 deaths of children in institutions for children with disabilities. This was due to the lack of a real prospect of a successful outcome of cases in the light of six ECtHR inadmissibility decisions on complaints made on behalf of children who died or who suffered from serious personal injury as a result of institutional care.

Domestic Litigation

During the year, LDP worked on 31 cases, which included work on undertaken litigation and filing of new cases.

Cases on the basis of ethnicity/race and religion

In 2018, LDP continued work on the attempt to forcibly remove the only homes of Roma families in Orlandovtsi in Sofia. LDP provided legal assistance to those living in three houses - the only ones left untouched after the campaign to remove them in the neighborhood.

In 2018, LDP provided legal assistance to a woman from the Roma neighborhood of Batalova Vodenitsa in Sofia in connection with an order to remove the house, which is her only home. LDP submitted a request for interim measures to ECtHR and challenged the order before court. After initially giving provisional measures, the Court acquainted the request with the Bulgarian government, which in response said that the demolition would be preceded by a discussion of the possibilities for alternative accommodation.

Other domestic litigation

In 2018, LDP work on the representation of two men from Varna who suffered a bias motivated beating in 2016 continued. The two were attacked by a crowd of skinheads on their way home.
In 2018 LDP continued work on the case filed together with ERRC against the Pazardjik Multi-Profile Hospital in connection with the established segregation of Roma women in maternity wards. This claim is the result of a 2016 situational test in 79 out of 81 state and municipal hospitals with such wards. 

In January 2018, the Pazardzhik Court convicted the attacker of a Roma man to pay BGN 3,400 (EUR 1,700) in damages for the bias-motivated crime.

LDP undertook to represent a Roma man from Pazardzhik, who became the victim of police violence in August 2018 in an attempt to suppress a conflict between Roma and law enforcement officials.

In February 2018, CPD handed down a decision in a case represented by LDP that provided legal assistance to a Syrian family who was granted humanitarian status in Bulgaria and was denied registration at a permanent and current address in Elin Pelin. CPD found that the mayor of the municipality of Elin Pelin - Ivaylo Simeonov, has made discriminations in the form of harassment and incitement to discrimination in the statements made to a Nova TV reporter in 2017 on the occasion of the accommodation of the Syrian family. In April 2018, CPD issued a second decision on the file, rejecting the AP’s request to supplement the February ruling with a ruling on the cumulative claim that the Mayor of Elin Pelin had also discriminated against. In November 2018, the ACCA revoked the CPD decision in April. CPC filed a cassation appeal against the decision. The case is currently pending before the Supreme Administrative Court.

In November 2018, CPD ruled on a case in which LDP provides legal assistance to the Roma activist from Samokov and the chairman of the Savore Foundation Hristo Nikolov. CPD found that the writing, publication and dissemination of an article entitled “The Gypsies Are Bulgarian Terrorists!” Weekend newspaper and its publisher Martin Radoslavov have discriminated against in the form of “harassment” and “incitement to discrimination”. The defendants appealed and until the end of the reported period the case is pending before the court.

LDP represents the black British national Leon Coffey, who suffered a severe beating in Sofia by a group of about 50 people after the end of the soccer game between CSKA Sofia and Levski in Sofia on 29 September 2018. The Briton, who works as a sales representative in the Bulgarian office of an international company, was attacked in front of the building of the Interior Ministry.

While they kicked him on the ground, the attackers imitated monkey sounds. The attack was witnessed by policemen who were in the immediate vicinity during the beating. Pre-trial proceedings have been instituted for mediating bodily injury through hooliganism.

In 2018, LDP provided legal aid to a man born in Palestine, who has been living in Bulgaria since 1992. The man has no citizenship, so there is no current valid identity document. The man was forced to the ground on the street by police officers who forcibly handcuffed him and took him to the local police station without giving him an explanation on the reasons of his detention. In the police station, he became the victim of police violence. In May 2018, the Sofia prosecution refused to initiate pre-trial proceedings.

In May the Burgas Regional Court ruled as a second instance with a decision on the case of the Roma activists represented by LDP Ognyan Issaev and Kremena Budinova against the former deputy and current deputy prime minister of the ultranationalist NFSB Valery Simeonov. The first
instance decision was appealed. The Bourgas Court rejected the claim of the representatives of the PP and confirmed the decision in the rest of the case. The decision was appealed to the Supreme Court of Cassation, and the Supreme Court allowed the case to be heard regarding the finding that Simeonov’s statements constituted harassment.

LDP represented a man professing Islam, whose beard was forcibly shaven during his stay in Lovech prison. The man wore his beard on religious grounds. In April 2018, CPD issued a decision finding that the prison in Lovech had been discriminated on religious grounds. The decision was confirmed by the Lovech Administrative Court. The case is pending before the SAC.

In February, LDP cooperated and drafted an appeal for an NGO activist contesting an order of the mayor of Samokov for a protest organized by the applicant. The mayor’s order was overturned by the Sofia Administrative Court and the protest was successful.

In June, LDP sent a signal to CPD in connection with a Facebook publication of the director of 9 Primary School "Peyo Kracholov Yavorov" - Blagoevgrad, where the school principal announced that no Roma first graders would be enrolled in the school. In December, the first public hearing on the case was held.

**Cases on the grounds of gender and sexual orientation**

LDP intervened in a lawsuit led by a lawyer from another civil organization - Youth LGBT organization Action - related to the case of two women married in the UK in 2016. The case concerns the refusal of Sofia Municipality to register their marriage. LDP prepared a statement on the law of the ECHR and the case-law of the ECtHR.

In 2018, the Sofia City Court upheld the decision of the lower instance court in a case led by the LDP to change the civilian sex of a transsexual. LDP filed a cassation appeal with the Supreme Court of Cassation against the Sofia City Court’s decision, with the hearing on the admissibility of a cassation appeal being held in February 2019.

In October 2018, a court hearing was held in the case of a human rights activist against the popular journalist Martin Karbovski for persecution within the meaning of Protection from Discrimination Act. The Sofia District Court in favor of the human rights activist, which is an important positive precedent. For the first time, the Bulgarian court has established an act of persecution as a form of discrimination; a journalist was for the first time convicted of prosecuting a human rights activist; for the first time a human rights activist successfully defended himself in court from persecution; a defendant in a discriminatory case has been convicted for the first time to publish the judgment in a newspaper chosen by the plaintiff. The Sofia City Court upheld the decision of the district court in December 2018. Proceedings will continue before the Supreme Court of Cassation.

**Other cases**

In 2018, the Supreme Court ruled on a case filed against the State Agency for State Security in connection with its refusal to execute the court decision to provide the statistical information requested by the BHC on the number of persons to whom special investigative tools were applied in 2013. The Supreme Court found that SANS needs to comply with the 2015 court decision and to provide the requested information. Later in the year, SANS provided the information, and LDP filed an
enforcement claim for the costs in the two legal proceedings.

LDP won a lawsuit under the Access to Public Information Act in connection with the refusal of the president of the Sofia City Court to provide information on the convictions for murders ordered by the court in 2016 and 2017.

STRATEGIC LITIGATION BEFORE THE EUROPEAN COURT ON HUMAN RIGHTS

In 2018, the Legal Program worked on 13 proceedings before the ECtHR, of which 8 are new applications. They concern the inaction of authorities to prevent the death of a victim of systematic domestic violence, the right to privacy, the prohibition of torture and inhuman treatment, freedom of religion, the exercise of parental rights, criminal hate speech:

- **Tuneva and Others v Bulgaria.** In February 2018, LDP filed a complaint on behalf of the mother and two daughters of Elena Vassileva, who was murdered by her husband and father of her children after numerous complaints to the competent authorities by Elena Vassileva for domestic violence and their inaction to prevent her death. The complaint alleges that it was the state’s inaction that lead to the victim’s death. The complaint also addresses the pressing problem of the lack of domestic remedy against acts or omissions of police, prosecutors, and the limited scope of the State and Municipalities Liability Act (SMRT).

- **Hadzhiev v Bulgaria.** In June 2018, LDP filed an application with the ECtHR on behalf of a person with Russian and Turkmen citizenship, who has been permanently resident in Bulgaria since 2001, with refugee status since 2007, who was denied Bulgarian citizenship on account of a letter from the State Agency for National Security, which alleged that he posed a threat to national security. Hadzhiev made persistent attempts to obtain information from SANS if relevant data were handled by SANS. The complaint alleges that the lack of any justification for SANS’s allegations, which the Bulgarian courts perceive unambiguously, violates the applicant's private life, as he is unable to defend himself against such an allegation.

- **Kitov v Bulgaria.** In April 2018, LDP requested the ECtHR to impose interim measures on the case of prisoner Kitov, a young man suffering from a rare form of cancer in terminal stage. Before being detained for execution of a verdict for a minor offense, Kitov had begun treatment in a hospital in Spain, as this method was not applied in Bulgaria. During his one-year stay at Sofia’s Central Prison, Kitov had been subjected to extremely inadequate and ineffective treatment, and then was left in the prison hospital without any treatment, including pain killers and no opportunity to visit his relatives. Meanwhile, Kitov was pardoned by the President.

- **Isbishali v Bulgaria.** In November 2018, LDP filed a complaint with the ECtHR
on behalf of a Bulgarian national, a public figure of the Muslim and Turkish community in Sofia and a regional mufti since October 2011. The complaint concerns appeals and demands for violence against Muslims and ethnic Turks in general and in particular against the applicant, as well as calls for arson of a Muslim temple managed and managed by the applicant in Sofia due to the refusal of the authorities to authorize the construction of a second mosque in the capital. It also concerns the refusal of the Bulgarian authorities, in the person of the Prosecutor's Office of the Republic of Bulgaria, to investigate these appeals and insults.

- **Swierkoski and Others v Bulgaria.** In December 2018, LDP together with another lawyer filed a complaint with the ECtHR on behalf of a Brazilian national residing in Bulgaria in connection the unlawful failure to return her two minor children by their Bulgarian father, although custody of the children was given to her. The application concerns the ineffective measures imposed by the responsible institutions, which in practice assisted the father in opposing his children's return. LDP filed an application before the ECtHR.

In April 2018, the municipal authorities in Plovdiv proceeded to a new demolition of the houses of six of the applicants represented by BHC at ECtHR in Yuseinova and Others v Bulgaria. In 2018, LDP provided a counter memorial on the Government's submission on the case.

### OPINIONS ON DRAFT ACTS, ASSESSMENT OF IMPLEMENTATION OF ECtHR JUDGMENTS

In June 2018, LDP submitted a negative opinion on the proposed amendments to the regulations for functioning of the State Agency for National Security, which amended the regime of the work of undercover agents. First of all, in addition to state bodies, organizations and legal entities – in line with the present regime - secret agents will be able to work in public administration, legal entities, civil society organisations and freelancers, and could be deployed without the knowledge of the employer, unlike the current regime. There is no guarantee that the privacy of individuals will not be unduly affected.

LDP informed the Committee of Ministers of the Council of Europe on the progress of implementation of ECtHR judgments against Bulgaria – including on the implementation of the Kehayov v Bulgaria group (pilot judgment Neshkov and Others v Bulgaria on reform in Bulgarian prisons and
detention facilities) and on implementation of the group Yordanova and Others v Bulgaria (evictions from only homes). In December 2018, BHC provided information on the implementation of the group Nencheva and Others v Bulgaria (institutional child deaths due to neglect).

ROMA ENPOWERMENT FOR ANTIDISCRIMINATION AND INTEGRATION PROJECT

In 2018, we launched the project "Roma Empowerment for Anti-Discrimination and Integration: Strengthening the Capacity at Regional Level in Anti-Discrimination and Integration" – a two-year initiative, supported by the European Union. Coordination is implemented by the Programming and Administration Programme. The project is implemented with the organizations Drom - Vidin Association, Roma Academy for Culture and Education - Sliven and Largo - Kyustendil.

A series of focus groups were held, on the basis of which we drew up an analysis on the main discriminatory models that Roma communities meet on the ground. At the same time, a national report with identified good practices of Roma integration throughout the country in the sphere of education, healthcare, legalization of housing, employment was prepared.

The Legal Programme prepared an analysis of the case-law under the Protection against Discrimination Act on the grounds of ethnicity/racen since 2004 to 2017. An analysis was published, entitled The Roma in the Case-Law of PfDA (2004 - 2017). The authors also produced a Handbook on Anti-Discrimination Law. They are to be used during the trainings organized in 2019.

At the end of 2018, together with the Campaigns and Communications Programme, a series of 14 videos was filmed to introduce viewers into some of the key concepts and standards of anti-discrimination law. All videos are available for viewing on the BHC YouTube channel. In the spring of 2019 we will launch a special website on the project deliverables.

LEGAL PROTECTION OF REFUGEES AND MIGRANTS

In 2018, the BHC Legal Program for the Protection of Refugees and Migrants continued its activity started 22 years ago in 1994 with the support of the United Nations High Commissioner for Refugees. This year, the BHC work on the legal protection of refugees and migrants was also supported by UNICEF with a focus on the protection of unaccompanied migrant children.
The activities of the program include monitoring and evaluation of the practice in conducting the procedures for granting international protection and status on the territory of Bulgaria, border monitoring and monitoring of the administrative centers for detention of foreigners regarding the provision of access to territory and procedure, including strategic cases before national courts, monitoring and advocacy for the protection of unaccompanied children and their protection against unlawful detention. The activities of the programme are aimed at creating legal standards for the protection of refugees and observance of the fundamental rights of migrants as well as advocacy and lobbying to create legal and practical guarantees in the legislation to protect the fundamental human rights of foreigners of all categories in the territory Bulgaria.

The programme activities are implemented in the basis of several permanent institutional agreements with the United Nations High Commissioner for Refugees of 1994, the State Agency for Refugees, the Directorate-General for Border Police at the Ministry of Interior in 2005 and the Migration Directorate at the Ministry of Interior in 2007 and the National Bureau of Legal Aid from 2017.

LEGAL CONSULTATIONS, BORDER MONITORING

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, Harmanli, Banya and Pastrogor. Continuous border monitoring was carried out at the police detention facilities at the main border between Bulgaria and Turkey at the border checkpoints, 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 and Lyubimets. The program 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 proactive representation before the regional administrative courts and the Supreme Administrative Court in the cases of serious violations of material or procedural rights.

In 2018, in order to comply with the principle of non-refoulement under Article 33 of the Geneva Convention, the programme carried out 486 border visits and provided legal assistance for the submission of an application for protection at the land border and access to the territory of 655 seekers border protection, of which - 394 persons at the entry border and 261 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 2018, the BHC carried out a survey of the Dublin transfer to 86 foreigners who were transferred to Bulgaria from other Member States in fulfillment of the substantive criteria of the Dublin Regulation.
In 2018, 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. In the course of the year, the programme carried out 126 visits to such facilities, as a result of which it was able to provide legal assistance for access to procedure of 1,876 asylum seekers, of which 1246 men and 175 women, as well as 221 accompanying children and 233 unaccompanied children (228 boys and 5 girls) who were assisted in submitting an application for protection to the administration of immigration police.

MONITORING OF THE PROCEEDINGS FOR INTERNATIONAL PROTECTION, LITIGATION

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 Pastrogor were observed. The programme monitored 607 procedural actions in international protection proceedings with regard to 406 men, 101 women, 44 accompanying children and 56 unaccompanied children. Of these, 349 are the procedures for assessing the application for protection before the administrative body and 118 lawsuits for complaints against refusals of protection. An assessment and analysis of 140 negative decisions of the administrative body was made. As a result, the Annual Report on the monitoring of the asylum procedure in 2018, which contains recommendations for improving the standards of refugee proceedings, has been drawn up.

A total of 330 cases were filed before the administrative courts against negative decisions of the State Agency for Refugees, assessing the application for protection, of which 108 cases were brought before the courts. 51 cancellations were achieved, which represents a 16% success rate of all assisted appeals. A further 100 cases were represented for discriminatory treatment on grounds of nationality and country of origin, of which 31 were won, 58 were lost, 1 was suspended and 10 were hanging on 31 December 2018, representing a 31% success rate.

In 2018, the programme filed another 106 strategic cases addressing the following problem areas: 59 cases against illegal detention of asylum seekers, 9 cases against refugee proceedings in detention facilities, 3 cases against accommodation in closed-type refugee centers, 13 cases against refusal of SANS to provide information, 11 cases against prolonged detention orders, 5 cases against expulsion orders, 1 case against refusal to provide social assistance to a child, 1 case against refusal to recognize women as a social group, 1 case against refusal to issue an ID, and 3 cases before the...
European Court of Human Rights M.A. and Others v Bulgaria, O.D. v Bulgaria and S.A v Bulgaria, in all of which the Court granted interim measures under Rule 39 of the Rules of Court.

In 2018 the European Court of Justice issued judgements in the cases of C-585/16 Alheto and C-56/17 Fathi, in which it set important interpretations of the norms and standards in the sphere of asylum and which are compulsory for the domestic courts.

Thus, in 2018, the programme provided legal assistance, representation and consultation to a total of 4,863 beneficiaries, of which 1,699 individuals were granted access to territory and procedure (595 people at the border and 1104 people at homes for temporary placement of foreigners), separately 333 unaccompanied children at the border, 180 unaccompanied children in the homes for temporary accommodation and 93 children in the proceedings), 1587 persons for access to registration and during the process of granting international protection, 713 asylum seekers with a refusal to grant international protection, 263 final refused seekers protection in a procedure for voluntary return, 67 seeking protection in strategic cases, and 201 recognized refugees or persons with a humanitarian status, to a realization of their statutory social, health or other individual rights.

SPECIALISED REPORTS, TRAININGS IN REFUGEE LAW

During the past year, 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).

CAMPAIGNS AND COMMUNICATIONS ACTIVITIES

The BHC Campaigns and Communications Programme is responsible for the development and implementation of the BHC's campaigns and communications strategy on media issues, preparation of press releases, opinions and other news, working with journalists, maintaining the BHC website and social media networks. The programme is also responsible for producing and disseminating reports in Bulgaria and internationally, organizing part of the organization’s events and participating in coordinating a strategy for fundraising from local sources.
INTERNET SITE, ELECTRONIC BULLETIN

In 2018, the BHC published over 50 press releases, opinions and news related to the work of the organization or human rights in general. In the past year, the official BHC website, www.bghelsinki.org, it was visited by 72,524 unique users. Of these, 67% were from Bulgaria. The site is currently undergoing a complete upgrade, with the new site expected to be launched in the spring of 2019. Alongside the organization's core site, the Campaigns and Communications Programme also supports the site of the Human of the Year awards.

The program also disseminates a monthly newsletter and information about the organization's latest activities - including published reports, campaigns, and more. The number of subscribers in December was 765.

SOCIAL MEDIA PROFILES

From January 2018 to January 2019, the main BHC Facebook profile in Bulgarian has increased its followers from 10,941 to 11,954. The English-language Facebook page, set up in 2016, is becoming a source of human rights news in English for consumers from Bulgaria and abroad. The number of followers at the end of December 2018 was 2,377 Facebook users. The 'Human of the Year' page has 1,861 followers.

Twitter continues to be significantly less popular in the Bulgarian social network, but the BHC’s profile in the country still keeps track of its followers and its total number at the end of December 2018 reached 1,650 people. The LinkedIn BHC website has 207 followers by December 2018. The number of our YouTube subscribers is 161.

Live broadcasting on Facebook is still the way to reach more people. That is why the programme offered this service several times in 2018 in connection with several campaigns, the "Human of the Year" awards, as well as the presentation of the annual report of the organization.

The trend of steady growth in the number of BHC channel followers in social networks is confirmed. Factors for this are the policy of managing these profiles introduced in 2016, and the sharing of visual materials (images and videos), infographics, live events from a number of events, and up-to-date news and articles. We note this growth despite Facebook's increasingly restrictive Facebook policies, limiting the audience to which pages on the web are reaching.

In March 2018, the Campaigns and Communications Programme team prepared a short video on the work of the BHC. It will be used for fundraising purposes.

CAMPAIGNS IN 2018

In 2018, the Campaign and Communications Programme organized several advocacy campaigns. For the eleventh consecutive year the annual BHC Awards "Human of the Year" were also organized - the BHC Human Rights Awards.

23 Reasons Campaign

On the eve of January 23, 2018, when the Speaker of the National Assembly organized a public discussion on the Bill on the ratification of the Istanbul Convention, the BHC projected the names of 23 women who
had lost their lives on the hands of a partner or relative in the last 5 years in Bulgaria. The campaign image gained tremendous popularity in social networks and was used by all leading media as the main illustration in the ratification debates of the Convention and the problem of domestic violence in our country.

Sofia Pride 2018

The programme has been participating for the seventh consecutive year in the organizing committee of Sofia Pride, the biggest event supporting the rights of LGBTI people in Bulgaria. About 3,000 people took part in the event in 2018. Like every year, Sofia Pride took place in several components - a peaceful procession, a film and an art festival. For the first time this year, the programme included a sports week. The team participates in communication and co-ordination with authorities, in drafting the concept and design of the event's vision and all web and print materials. Documents have been prepared, such as letters to institutions for invitation or a specific question, to guests from abroad, declarations, etc., participation in meetings with guests or donors, embassies, organizations, guests from abroad, etc.

BHC is a co-organizer of the campaign and for another year participates in the planning and organization of the event. Co-organizers of the event were the "Alliance for Protection Against Gender-Based Violence" and the Resource Center - Bilitis Foundation. The initiative took place in partnership with the Bulgarian Red Cross, the Bulgarian Women's Fund and One Billion People - Bulgaria.

“Let's Close Down BHC!”

"Let's Close Down BHC!" campaign is the result of the collaboration between Campaigns and Communications and one of the leading advertising agencies in the country, Noble Graphics. In 2018, the first
video of the campaign received two prizes at the Bulgarian Festival of Creativity FAA 2018.

The campaign posters received silver prize in the "Outdoor Advertising" category, and the overall campaign received a bronze award in the "Integrated Campaign" category.

At the end of September 2018, the second video was part of the campaign. It was attended by people that the organization has helped over the years. The video will be uploaded to the site specifically created for the campaign www.dazakriembhk.org.

From the time of upload until the end of December 2018, the first video of the campaign “Let's Close Down BHC!” had been viewed by 103,620 people. More 6963 watched it on YouTube, making it the most popular media product created by the organization.

In 2019, the second video of the campaign will be released.

Photos: Noble Graphics

HUMAN OF THE YEAR ANNUAL AWARDS

In 2018, the Human of the Year Awards were organised for the eleventh time. This year’s jury featured distinguished journalists, judges, attorneys, public figures, human rights activists, and environmentalists.

The ceremony took place on December 10 at the Peroto Literary Club. The nominations considered by the jury were 44. The sought after actions had to have significant potential and to contribute to social development, to be a precedent in the human rights field, to inspire, to be original and innovative. In addition to the grand prize, the jury also identified a two runner up prizes and six special awards.

The protesting parents of children with disabilities were awarded the 2018 Human of the Year Award 2018. The Bulgarian Women’s Fund and Club “You’re Not Alone” were awarded a prize for their systematic efforts in the fight against gender-based
violence and stereotypes. The Loveguide Internet portal received the inspiration of the Year for advocating the rights of children and young people in Bulgaria through health and sexual education and prevention of sexual violence. The Wildlife Foundation and Animal Welfare Organization Four Paws won the "Advocates of the Year" award for the salvation of the Maksud and Theres lions born in the Razgrad Zoo. The journalist of the Year Award went to the investigative journalist Dimitar Stoyanov for his efforts to promote freedom of speech and the exposing of law enforcement actions. The award "Activists of the Year" awarded the jury to Youth LGBT Action, Resource Center - Bilitis Foundation and GLAS Foundation for their joint work on the opening of Rainbow Hub - the first LGBTI community center in Bulgaria. Andrian Hristov, director of the school in the village of Ivanovo near Harmanli, received the award in the category "Consistency and Bravery" for the successful and continuous integration of refugee children. In the "Goodness of the Year" category, the prize was awarded the National Civil Initiative 7,000 for the campaign to abolish guardianship and the implementation of the supported decision-making that preserves the dignity and rights of people with intellectual disabilities and mental health problems.

This year's jury consisted of: Alexander Kashumov, Boyana Petkova, Daniela Mihaylova, Krasimir Kanev, Krasimira Velichkova, Mariana Katsarova, Petko Petkov, Tatiana Vaksberg, Yavor Gechev and Yana Buhrer Tavanier.

INDIVIDUAL FUNDRAISING

Over the past few years, a fundraising strategy has also been included in the work of the Campaigns and Communications Programme. In 2018, the team continued to work on the creation of materials with a cause that can be purchased from the organization's online platforms. The team also participated in several one-time events where it sold part of these materials.

"Super Women" Coloring Cards

Super Women" is an educational collection of 30 color cards that tell the stories of women of importance to history all over the world. Among them are the stories of three Bulgarians. This is the first such series published in Bulgaria. The funds from card sales are intended to help finance the BHC's work on discrimination against women. The collection is the result of a partnership between BHC and Mamyglos.

The price of one colouring set is 20 BGN.
“Party for Narval” Children’s Book

At the end of 2018, the Campaigns and Communications Programme, together with Fine Acts, published the book "Party for Narval" by Pavel Kunchev and illustrator Aglica Spassova. The booklet will be distributed in the BHC’s online channels of communication, as well as through shops and public events.

Film screenings

At the end of October 2018, BHC organized two film screenings at the House of Cinema in Sofia. On 27 October, the Australian documentary GAYBY BABY was screened, followed by a discussion with Veneta Limberova of LGBT Youth Action Organization. On October 28, audiences could watch the Bulgarian film MARRIAGE by Slava Doycheva, who in 2018 won a special award at Golden Rose in Varna. 156 tickets were sold for both screenings with total proceeds of 400 BGN.

OTHER PROJECTS AND CAMPAIGNS

Change of the human rights narrative

In September 2018, Campaigns and Communications launched a new project to change the human rights narrative. The project began with a study of attitudes towards humanity through three sociological surveys - one major national and two small studies related to specific programme campaigns. The main goal at this stage is to find out the real attitudes, understandings, stereotypes and human rights themes that appeal to people. This will help to improve the BHC’s strategic communication and, accordingly, our communication with the public on issues affecting the protection of fundamental human rights, their reprisal, and the resulting problems and effective solutions.

ADMINISTRATION, DONORS AND EXPENDITURES

The BHC Programming and Administration Programme was responsible for fundraising for all activities of the organization outside the activities of the Refugees’ and Migrants Legal Protection Programme. The programme has a main role in drafting funding applications before major donors. The programme takes care of all accounting obligations before the Bulgarian authorities and international donors. Parallel to this, the program was also involved in other activities of the organization and coordinated the work of a large two-year EU project with three partner organisations in the country.
ADMINISTRATION AND ACCOUNTABILITY

The "Programming and Administration" Programme provides support to all BHC projects, which consists of general coordination, budgeting, administrative services, technical and logistical support, coordination of publishing of publications. The programme provides initial contact with clients; contacts with journalists in connection with press releases or other publications. Associates have a leading role in the organization and technical service of BHC public events, seminars and conferences.

The programme has a major role to play in ensuring transparent and rigorous reporting of the BHC's activities, revenues and expenditures to Bulgarian financial institutions. During the year, the BHC re-registered in the Commercial Register and Register of Non-Profits. The BHC reports from 2017 onwards will now be available in this public register.

In its work, the BHC has introduced a system of financial reporting and control on two levels. Everyday financial operations are carried out under the control of an external accounting firm and on a second level accountability is guaranteed by an independent financial audit, which has been carried out annually since 1998. All BHC financial statements and revenues are made public on the organization's website.

FUNDRAISING AND DONORS IN 2018

BHC funding is ensured through projects funded by European and international public and private donors.

In 2018, the BHC carried out its activities thanks to the support of several major donors. The institutional support provided by the Oak Foundation and the Open Society Foundations was of much importance to our work as allowed us to continue working on the strategic directions of BHC Strategy 2018-2023. In 2018, we also received institutional support from the Lion Levy Foundation.

In 2018, BHC's largest shares of funding were awarded to projects supported by the Oak Foundation and the Open Society Foundations, the United Nations High Commissioner for Refugees, UNICEF and the European Union (the Justice and Equality, Rights and Citizenship Programmes).

In 2018, BHC submitted a total of 14 proposals, either alone or in partnership with other NGOs, covering different strategic areas of work of the BHC. Of these, 10 were approved, decisions on two are pending, and two were not approved.

In 2018, we continued to receive support in the form of individual donations from private individuals and collected nearly 2,400 BGN. Donations were earmarked for our work in the field of Bulgaria's "Abandoned Children", the cases of discrimination against women and other upcoming campaigns. During the year, 785 BGN were collected in the donation account of the BHC (paypal, bank account), and from donations during events and sales of tickets, we raised 1,579 BGN during fundraising events.

We thank our individual donors for their continued trust in us.

Thanks to the Campaigns and Communications Programme to stimulate local donations during the year, we started...
to offer fundraising materials with a cause, the proceeds of which will be allocated for future campaign activities.

The share of each donor in our total funding, on basis of activity expenditure in the period January 1 - December 31, 2018, is given in the table and chart below:

<table>
<thead>
<tr>
<th>Donor</th>
<th>Supported Activity/Project</th>
<th>Expenditure in 2018 (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>358 755 €</td>
</tr>
<tr>
<td>Oak Foundation</td>
<td>General Support BHC 2018 (co-financing)</td>
<td>192 312 €</td>
</tr>
<tr>
<td>Open Society Foundations</td>
<td>General support BHC 2018 (co-financing)</td>
<td>33 857 €</td>
</tr>
<tr>
<td>European Union</td>
<td>Expenditure on projects, as follows:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Roma Empowerment for Antidiscrimination and Integration</td>
<td>21 214 €</td>
</tr>
<tr>
<td></td>
<td>Inside Police Custody</td>
<td>15 279 €</td>
</tr>
<tr>
<td></td>
<td>Strengthening Procedural Rights in the Criminal Process</td>
<td>12 933 €</td>
</tr>
<tr>
<td></td>
<td>Strengthening Court Protection of Fundamental Rights of Detainees in the EU</td>
<td>9 648 €</td>
</tr>
<tr>
<td></td>
<td>My Lawyer, My Rights</td>
<td>7 280 €</td>
</tr>
<tr>
<td></td>
<td>Effective Legal Defense in Pre-trial Detention</td>
<td>6 897 €</td>
</tr>
<tr>
<td></td>
<td>Strengthening Procedural Rights of People with Mental Disabilities in the Criminal Process</td>
<td>3 565 €</td>
</tr>
<tr>
<td></td>
<td>Adressing Unconscious Bias and Discrimination of Roma in the Criminal Justice System</td>
<td>152 €</td>
</tr>
<tr>
<td>UNICEF</td>
<td>Monitoring the Situation of Unaccompanied Migrant Children</td>
<td>68 655 €</td>
</tr>
<tr>
<td>OSIFE</td>
<td>Strengthening the Communications Capacity through the Strategic Use of Social Media</td>
<td>14 766 €</td>
</tr>
<tr>
<td>Open Society Foundations</td>
<td>Changing the Human Rights Narrative</td>
<td>9 263 €</td>
</tr>
<tr>
<td></td>
<td>Border monitoring activities (co-financing)</td>
<td>9 043 €</td>
</tr>
<tr>
<td>ECRE</td>
<td>Updating the Asylum Information Database</td>
<td>5 991 €</td>
</tr>
<tr>
<td>Baltic Human Rights Society</td>
<td>Human Rights Guide in Bulgaria</td>
<td>2 894 €</td>
</tr>
<tr>
<td>International Women's Club</td>
<td>Mapping Femicide in Bulgaria</td>
<td>2 556 €</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</td>
<td>Expenses not budgeted elsewhere</td>
<td>12 512 €</td>
</tr>
<tr>
<td><strong>Total expenditure in 2018:</strong></td>
<td></td>
<td><strong>789 700 €</strong></td>
</tr>
</tbody>
</table>
REPORTS AND OTHER PUBLICATIONS IN 2018

The BHC Annual Human Rights Report was published in April. The BHC published several thematic reports as well as two alternative reports on the implementation of international treaties to which Bulgaria is a party.

Human Rights in Bulgaria in 2017

In April 2018 BHC published its annual report on the state of human rights in Bulgaria in 2017 – a unique report in its scope and scale that is available in printed and electronic in Bulgarian and English.

The report was sent to over 400 recipients, including all MPs and the government. Parallel to the release of the report on traditional channels and social networks, the Campaigns and Communications Programme also created three short videos that presented the main conclusions on three of the main topics in the report - women’s rights, Roma evictions and freedom of the media. The videos have been viewed over 3000 times on Facebook.


Manual on antidiscrimination law

BHC issued a special manual on anti-discrimination law aimed at improving the knowledge of the various forms of discrimination and the mechanisms of legal protection against them. The manual is
primarily aimed at nonprofessionals, but it could also be useful for legal practitioners. The guide is available for free download on the BHC website.


BHC carried out a study of good practices in cases of protection of discrimination on the grounds of ethnicity, delivered in the period 2004-2017 and published an analysis of the 14-year case-law under the Protection against Discrimination Act of all the courts dealing with the cases under it, as well as of the Commission for Protection against Discrimination for the period from the entry into force of the law in 2004 until the end of 2017.

Alternative reporting before UN treaty bodies

BHC prepared two alternative reports to international human rights bodies to review the obligations under the International Covenant on Human Rights and to review the obligations under the International Covenant on Economic, Social and Cultural Rights before the Committee on Economic, social and cultural rights of the UN.

hatred, equality between men and women, LGBTI rights, rights of persons with disabilities, protection against torture and other ill-treatment, treatment of migrants, discrimination and minority rights, the right to freedom of conscience and religion, of children and others. The report is available on the UN website.

Practical handbook for lawyers: How to protect a child in conflict with the law?

Handbook and analysis on the protection of the procedural rights of people with mental disabilities
**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), Borislav Dimitrov (legal assistant), Diana Dragieva, attorney-at-law, Iveta Savova, attorney-at-law, Radoslav Stoyanov (communications expert).

**Campaigns and Communications Programme:**
Andrei Getov (multimedia producer), Bosilena Melteva (communications expert), Radoslav Stoyanov (communications expert), Radostina Georgieva (communications expert, until June), Raya Raeva (communications expert), Svetla Baeva (programme director, until November), Nadezda Tsekulova (communications director, from December), Yana Buhrer Tavanier (special projects consultant).

Special thanks to our volunteers during the year: Assen Hristov, Maya Geneva, Svetoslav Todorov, Zdravko Grigorov, Noura al Kadri, Alex Kostadinov, Jordan Van Santen and Milena Stateva.

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

**Refugees and Migrants Legal Protection:**
Antoaneta Dedikova (Legal Advisor), the attorneys Boris Rafailov, Valentina Nielsen, Georgi Voynoy, Elena Krasteva, Desislava Tyaneva (legal consultant), Dimitar Slavov, Elitsa Sekulova (Accountant), Zornitsa Chakarova (Legal Advisor), Iliana Savova (Program Director), Katia Dimitrova (Legal Consultant), Mariana Andreeva, Mariana Nikolova, Martin Hristov, Plamen Zhelev, Plamen Bojilov, Radostina Stefanova, and the profilers Diana Hristova, Elka Hristova, Milen Hristov, Borislav Dimitrov, Zdravko Ivanov and Omedan Niyazai (Profitters for the Refugee Center in Harmanli), Hristo Adamov. In 2018, we worked with the translators Ali Jirādat, Badran Jārūs, Emil lia Mihailova, Ibrahim Jārāmadat, Lyudmila Yaneva, Mohamed Orphan and Salahuddin Pactaval.

**GENERAL ASSEMBLY, EXECUTIVE COMMITTEE**

**GENERAL ASSEMBLY**
BHC activities directed by the General Assembly. The General Assembly is the supreme governing body of the association:

**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 MEMBERS OF ASSOCIATION BULGARIAN HELSINKI COMMITTEE

Opinion

We have audited the financial statements of ASSOCIATION BULGARIAN HELSINKI COMMITTEE (the Association), which comprise the balance sheet as at December 31, 2018, and the profit and loss statement, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements:

- give a true and fair view of the financial position of the Association as at December 31, 2018, and of its financial performance for the year then ended; and
- are prepared in accordance with National Accounting Standards.

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 (IESBA Code) and with the ethical requirements set out within the Independent Financial Audit Act, and have fulfilled our other ethical responsibilities in accordance with the IESBA Code and Independent Financial Audit Act (IFAA), applicable for Bulgaria. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.
Other information different from the financial statements and our auditor’s report thereon

Management is responsible for the other information. The other information comprises the information included in the Annual Activity Report, prepared by the Management as per the requirements of Accountancy Act’s Chapter Seven, 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 explicitly and to the extent stated in our auditor’s 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.

Report on Other Legal and Regulatory Requirements, prescribed by the Bulgarian Accounting Act

In addition to our reporting responsibilities under ISAs regarding the Annual Activity Report, we have also performed the procedures added to the required ISA by the instructions given by the professional organization of Certified Public Accountants and Registered Auditors in Bulgaria - Institute of Certified Public Accountants (ICPA), issued in November 2016, approved by its Governing Council on November 29, 2016. These procedures concerning review of the form and contents of such other information in order to help us in forming an opinion on whether the other information includes disclosures required as per Chapter Seven of the Accounting Act, applicable in Bulgaria.

Opinion with regard to Art. 37, Item 6 of the Accounting Act

a) Information comprising the Annual Activity Report for the year ending December 31, 2018 complies with the financial statements for the same accounting period.

b) The Annual Activity Report for the year ending December 31, 2018 has been drawn up in compliance with Chapter Seven of the Accounting Act.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with National Accounting Standards, including the exemptions for
presentation and disclosure according to these standards and to art. 29 of Bulgarian Accounting Act 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 have no realistic alternative but to do so.

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

The objectives of our audit 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 IFAA and 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 planning and performance of 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 consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with Management, 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.

Audit company ISA Audit OOD
Representative:
IZABELA DZHALAZOVA

Registered auditor responsible for the audit:
IZABELA DZHALAZOVA
March 11th, 2019
Sofia, Bulgaria
### BALANCE SHEET
Association Bulgarian Helsinki Committee
as at 31.12.2018

#### Assets

<table>
<thead>
<tr>
<th>Divisions, groups, articles</th>
<th>Amount (thousands)</th>
<th>Liabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current year</td>
<td>Previous year</td>
</tr>
<tr>
<td>a</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>B. Non-current (fixed) assets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>III. Long-term financial assets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Shares and stakes in group undertakings</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Total III:</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Total for section B:</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>C. Current (short term) assets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I. Inventories</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Production and goods including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- goods</td>
<td>11</td>
<td>10</td>
</tr>
<tr>
<td>Total I:</td>
<td>11</td>
<td>10</td>
</tr>
<tr>
<td>II. Claims</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Receivables from customers and suppliers</td>
<td>7</td>
<td>8</td>
</tr>
<tr>
<td>4. Other claims</td>
<td>13</td>
<td>16</td>
</tr>
<tr>
<td>Total II:</td>
<td>20</td>
<td>24</td>
</tr>
<tr>
<td>IV. Cash, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- cash</td>
<td>12</td>
<td>5</td>
</tr>
<tr>
<td>- unlimited accounts (deposits)</td>
<td>1 035</td>
<td>587</td>
</tr>
<tr>
<td>Total IV:</td>
<td>1 047</td>
<td>592</td>
</tr>
<tr>
<td>Total for section C:</td>
<td>1 078</td>
<td>626</td>
</tr>
<tr>
<td>D. Expenses for future periods</td>
<td>335</td>
<td>628</td>
</tr>
<tr>
<td>AMOUNT OF ASSETS</td>
<td>1 414</td>
<td>1 254</td>
</tr>
</tbody>
</table>

#### Liabilities

<table>
<thead>
<tr>
<th>Divisions, groups, articles</th>
<th>Amount (thousands)</th>
<th>Liabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current year</td>
<td>Previous year</td>
</tr>
<tr>
<td>a</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>A. Own capital</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IV. Reserves</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Other Reserves</td>
<td>297</td>
<td>297</td>
</tr>
<tr>
<td>Total IV:</td>
<td>297</td>
<td>297</td>
</tr>
<tr>
<td>Total for section A*:</td>
<td>297</td>
<td>297</td>
</tr>
<tr>
<td>B. Obligations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Payables to suppliers, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- up to 1 year</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>8. Other liabilities, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- up to 1 year</td>
<td>17</td>
<td>15</td>
</tr>
<tr>
<td>Liabilities to employees, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- up to 1 year</td>
<td>13</td>
<td>10</td>
</tr>
<tr>
<td>Insurance obligations, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- up to 1 year</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Tax liabilities, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- up to 1 year</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Total for section B, including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- up to 1 year</td>
<td>20</td>
<td>18</td>
</tr>
<tr>
<td>AMOUNT OF LIABILITIES</td>
<td>1 414</td>
<td>1 254</td>
</tr>
</tbody>
</table>

**Date:**
Sofia, 08 March 2019

**Prepared by:**
Alexander Georgiev
for Zhekova-Staneva
and Georgiev - accounting office Ltd.

**Representatives:**
Krasimir Kanev

---

Заверил съгласно оценителски доклад.
11 МАР 2019
Управител
ИсаAudit Ltd.
### PROFIT AND LOSS STATEMENT
from non business activity
Association Bulgarian Helsinki Committee
for the year 2018

<table>
<thead>
<tr>
<th>Name of costs</th>
<th>Amount (thousands)</th>
<th>Current year</th>
<th>Previous year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>I. OPERATING EXPENSES</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Administrative costs</td>
<td>1 835</td>
<td>1 408</td>
<td></td>
</tr>
<tr>
<td>Total I</td>
<td>1 835</td>
<td>1 408</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>12</td>
<td></td>
</tr>
<tr>
<td>6. Other financial expenses</td>
<td>5</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Total II</td>
<td>7</td>
<td>13</td>
<td></td>
</tr>
<tr>
<td>V. Total expenses</td>
<td>1 842</td>
<td>1 421</td>
<td></td>
</tr>
<tr>
<td>VI. Result</td>
<td>-</td>
<td>21</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>1 842</td>
<td>1 442</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of revenues</th>
<th>Amount (thousands)</th>
<th>Current year</th>
<th>Previous year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>I. OPERATING REVENUE</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Revenue of regulated activities</td>
<td>1 821</td>
<td>1 410</td>
<td></td>
</tr>
<tr>
<td>1. Revenues from donations under condition</td>
<td>1 821</td>
<td>1 410</td>
<td></td>
</tr>
<tr>
<td>3. Membership fees</td>
<td>1</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>1 823</td>
<td>1 412</td>
<td></td>
</tr>
<tr>
<td>II. Financial income</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Interest income</td>
<td>-</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Total II</td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>IV. Profit from business activity</td>
<td>19</td>
<td>29</td>
<td></td>
</tr>
<tr>
<td>V. Total income</td>
<td>1 842</td>
<td>1 442</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>1 842</td>
<td>1 442</td>
<td></td>
</tr>
</tbody>
</table>

Date: Sofia, 08 March 2019

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

Representatives: Krassimir Kafed

[Audit report stamp]

[Signature]

[Stamp: София Per. № 130 IsaAudit Ltd]
### PROFIT AND LOSS STATEMENT
from business activity
Association Bulgarian Helsinki Committee
for the year 2018

<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>A. EXPENSES</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Costs of raw materials and external services including:</td>
<td>-</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>External services</td>
<td>-</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>3. Staff costs, including:</td>
<td>-</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Wages and salaries</td>
<td>-</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Social security costs, including</td>
<td>-</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>5. Other expenses</td>
<td>3</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Total expenses from operating activities</td>
<td>3</td>
<td>5</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>Previous year</td>
<td></td>
</tr>
<tr>
<td>B. REVENUES</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Net sales revenue:</td>
<td>24</td>
<td>37</td>
<td></td>
</tr>
<tr>
<td>- Goods</td>
<td>2</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>- Services</td>
<td>22</td>
<td>36</td>
<td></td>
</tr>
<tr>
<td>Total income from operating activities</td>
<td>24</td>
<td>37</td>
<td></td>
</tr>
<tr>
<td>Total income from ordinary activities</td>
<td>24</td>
<td>37</td>
<td></td>
</tr>
<tr>
<td>Total income</td>
<td>24</td>
<td>37</td>
<td></td>
</tr>
</tbody>
</table>

#### Additional Notes:

- **Date:** Sofia, 08 March 2019
- **Prepared by:** Alexander Georgiev
- **Representatives:** Krassimir Kaney

---

**Audit Report:**

11 MAR 2019

[Signature]

[Stamp]
CASH FLOWS STATEMENT
Association Bulgarian Helsinki Committee
for the year 2018

<table>
<thead>
<tr>
<th>Title of cash flows</th>
<th>Current year</th>
<th>Previous year</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Cash at the beginning of the period</td>
<td>592</td>
<td>830</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>1,977</td>
<td>1,254</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>-</td>
<td>1</td>
</tr>
<tr>
<td>7 Other proceeds</td>
<td>7</td>
<td>5</td>
</tr>
<tr>
<td>Total inflow (cash) from non business activity</td>
<td>1,985</td>
<td>1,261</td>
</tr>
<tr>
<td>B. Outflow (cash) for non business activity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Paid wages</td>
<td>241</td>
<td>278</td>
</tr>
<tr>
<td>3 Paid Insurance obligations</td>
<td>127</td>
<td>156</td>
</tr>
<tr>
<td>4 Paid bank and currency operations</td>
<td>6</td>
<td>13</td>
</tr>
<tr>
<td>5 Paid services</td>
<td>1,166</td>
<td>1,004</td>
</tr>
<tr>
<td>6 Other payments</td>
<td>12</td>
<td>72</td>
</tr>
<tr>
<td>Total outflow (cash) for non business activity</td>
<td>1,552</td>
<td>1,523</td>
</tr>
<tr>
<td>B. Net cash flow from non business activity</td>
<td>433</td>
<td>(262)</td>
</tr>
<tr>
<td>III. Cash flows from business activity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A Inflow (cash) from business activity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Revenues from clients</td>
<td>27</td>
<td>27</td>
</tr>
<tr>
<td>4 Other proceeds</td>
<td>6</td>
<td>-</td>
</tr>
<tr>
<td>Total inflow (cash) from business activity</td>
<td>33</td>
<td>27</td>
</tr>
<tr>
<td>B Outflow (cash) for business activity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Payments to suppliers</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>3 Paid taxes</td>
<td>3</td>
<td>-</td>
</tr>
<tr>
<td>5 Other payments</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Total outflow (cash) for business activity</td>
<td>11</td>
<td>3</td>
</tr>
<tr>
<td>B. Net cash flow from business activity</td>
<td>22</td>
<td>24</td>
</tr>
<tr>
<td>IV. Cash at the end of the period</td>
<td>1,047</td>
<td>592</td>
</tr>
<tr>
<td>V. Change in cash during the period</td>
<td>455</td>
<td>(238)</td>
</tr>
</tbody>
</table>

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

Representatives:
Krassimir Kanev

Date:
Sofia, 08 March 2019
EQUITY STATEMENT  
Association Bulgarian Helsinki Committee  
as at 2018  

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Reserves</th>
<th>Total equity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Other Reserves</td>
<td></td>
</tr>
<tr>
<td>1. Balance at the beginning of the reporting period</td>
<td>297</td>
<td>297</td>
</tr>
<tr>
<td>4. Balance after changes in accounting policy and errors</td>
<td>297</td>
<td>297</td>
</tr>
<tr>
<td>11. Balance at end of reporting period</td>
<td>297</td>
<td>297</td>
</tr>
<tr>
<td>13. Equity at end of reporting period</td>
<td>297</td>
<td>297</td>
</tr>
</tbody>
</table>

Date:  
Sofia, 08 March 2019

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

Representatives:  
Krassimir Kanev

Завери съгласно аудиторски доклад  
11 MAR 2019  
ИсаAudit ООД  
Управител  
Регистриран аудитор  
IsaAudit Ltd

София  
Реg. № 130  
ИсаAudit ООД