



STATEMENT

By Assoc. Prof. Dr. Rusi Vladimirov Yanev, Associate Professor at the Department of National Security at the National Security and Public Order Training and Research Centre of the Higher School of Security and Economics - Plovdiv, member of the scientific jury for evaluation of the materials submitted by Gergana Dimitrova Yordanova for participation in the competition for the academic position of Associate Professor at the Higher School of Security and Economics - Plovdiv, professional field 9.1. National Security (Anti-Money Laundering and Countering the Financing of Terrorism and Proliferation)

Compliance of the quantitative results of the candidate's scientific and teaching activity with the national minimum requirements for the academic position of Associate Professor in the professional field of National Security

Doctor Gergana Dimitrova Yordanova participated in the competition for associate professor, announced in the State Gazette, issue 81 of 11.10.2022 for the needs of the Higher School of Security and Economics (HSSE) - Plovdiv. The candidate obtained the degree of Doctor of Education and Science (Ed.D.) in Military and Political Problems of Security in 2016 after studying at the Georgi Stoykov Rakovski Military Academy, for which she presented Diploma No. 74 of 11.01.2016 issued by the Academy. Gergana Yordanova holds the academic position of Assistant Professor at the Department of National and International Security of the New Bulgarian University – Sofia (NBU).

The author has submitted a published monograph and other works for the competition. With the acquired doctoral degree, the teaching activity at the NBU and the published independent monographic work, Gergana Dimitrova Yordanova meets the conditions stipulated in the Act on development of the academic staff in the Republic of Bulgaria (ADASRB), significant for the beginning of the assessment of the existence of the minimum national requirements for the academic position "Associate Professor" in the professional field of "National Security".

I determine the following quantitative assessment of the materials submitted in the competition by Dr. Gergana Yordanova in accordance with the minimum national requirements for the academic position of Associate Professor in the professional field of National Security:

- 50 points for defended dissertation and awarded PhD;
- 100 points for a habilitation thesis - a published independent monograph on "Hawala. Essence. Typologies of money laundering, terrorist financing and proliferation", published by the Institute for National and International Security Foundation, Sofia, 2023, ISBN 978-619-7143-14-0;
- 75 points for a peer-reviewed monograph on "Sovereign Debt Management Model", published by the National and International Security Institute Foundation, Sofia, 2022, ISBN 978-619-7143-15-7, submitted as a published book of the defended dissertation;
- 10 points for an article on "Sovereign Debt as an Evolving Challenge of Hybrid Warfare", 11 pages, published in the non-refereed peer-reviewed journal Information and Security: An International Journal, volume 39(2), 2018 [online], eISN 1314-2119;
- 10 points for the scientific paper "Reforming Sovereign Debt against Hybrid Threats", volume of 4 pages, published in the Proceedings of the Fourth International Scientific and Practical Conference "Modernization of National Economy Management", organized by the Kyiv National Economic University "Vadym Getman" in 2016, ed. KNEU, Kyiv, 2016, ISSN 2411-4383.
- 10 points for a scientific paper on "Debt accumulation as a hybrid threat in contemporary conflicts", volume of 7 pages, published in a peer-reviewed collection of papers part one of an annual scientific conference of the Faculty of National and International Security of the Military Academy of Bulgaria, held on 19-20th of May 2016 - "Contemporary Challenges to Security and Defence", edition of the Military Academy "Georgi Stoykov Rakovski", Sofia, 2017, ISBN 987-954-9248-84-2
- 10 points for a scientific paper on "New Settlement Mechanisms of the "Hawala" Type in the Context of Money Laundering and Terrorist Financing", 8 pages, published in the peer-reviewed proceedings of the VIII International Scientific Conference "Scientific Research - a Key Factor for Acquiring New Defence Capabilities". International Defence Exhibition "Hemus". Plovdiv, 25 - 28 May 2016", edition of Military Academy "Georgi Stoykov Rakovski", Sofia, 2016, ISSN 1312-2916;
- 10 points for the scientific paper "The Impact of the Hawala System on Financial Transactions in the Balkans in the Context of Migration Flows: The Case of Bulgaria", 16 pages, published in the peer-reviewed proceedings of the scientific conference "The Balkans in the Changing Security Environment", Plovdiv, 5th of November 2016, Paisii Hilendarski University Press, Plovdiv, 2019, ISBN 978-619- 202-209-9;

- 10 points for a scientific paper on "Generating Financial Security by Reforming Cash Transfer Mechanisms in the EU in the Context of Migration Flows", volume of 4 pages, published in a peer-reviewed collection of papers and scientific communications from an international roundtable "Europe in the 21st Century: Regional Security and Necessary Reforms in the European Union", organized by the Department of National and International Security of New Bulgarian University in 2016, New Bulgarian University Press, Sofia, 2017, ISBN 978-954-535-953-8;

- 10 points for a scientific paper on "How ISIS finances its activities", 5 pages, published in the peer-reviewed proceedings of the annual scientific conference of the Faculty of National Security and Defence, held on 18 and 19 May 2017 in Sofia, published by the Georgi Stoykov Rakovski Military Academy, ISBN 978-954-9348-92-7;

- 10 points for a scientific paper on "Islamic Finance as an Asymmetric Threat to Europe's Financial Security", volume of 7 pages, published in the peer-reviewed proceedings of the International Scientific Conference "The Challenges Facing the EU and NATO in the Context of Radicalisation, Terrorism and Migration", 11-12 April 2018, part one, edition of the Military Academy "Georgi Stoykov Rakovski", Sofia, 2018, ISBN 978-619-7478-18-1;

- 10 points for a scientific paper on "The New Geopolitical Realities: Orthodox Russia and the Course to Islamic Finance", volume 8 pages, and 10 points for a scientific paper on "The Geopolitics of Islamic Finance in Christian Germany", volume of 5 pages, published in the peer-reviewed proceedings of the scientific conference "Current Security Issues", 25-26th of October 2018, edition of the National Military University "Vasil Levski", 2018, ISSN 2367-7473;

- 10 points for a scientific paper on "The Geopolitics of Islamic Finance in Christian Europe", volume of 6 pages, published in the peer-reviewed proceedings of the Jubilee International Scientific Conference "Security and Economy in an Uncertain World - Dilemmas and Challenges", HSSE - Plovdiv, 2019, ISBN 78-619-7343-24-3;

- 60 points for citations of the candidate by various authors in collective volumes and non-refereed peer-reviewed journals.

The quantitative assessment reaches the minimum required points for the groups of indicators for the academic position of Associate Professor in the professional field of National Security, in accordance with the Annex to Art. Article 1 of the Regulations for the Implementation of the Law on National Security.

Results of the presented scientific research works of the candidate

To evaluate the results of the candidate's work, I have reviewed one monograph, one published article, and ten published research papers. All of the works have been created by

Gergana Yordanova after obtaining the doctoral degree, they do not repeat the dissertation work and are related only to the requirements for the academic position "Associate Professor" in the professional field of "National Security".

The main habilitation work of Dr. Gergana Yordanova is the published monograph "Hawala. Essence. Typologies of Money Laundering, Terrorist Financing and Proliferation" in 178 pages. The topic is relevant, interdisciplinary and its structured presentation intertwines descriptive and explanatory approaches to search for an effective model of work of specialized law enforcement structures in countering money laundering, terrorist financing and proliferation through effective control of unregulated system of money transfer. Well-known but reinterpreted theoretical propositions from management science, security science, economics and finance are skillfully touched upon, which has led to reasonable conclusions about the guidelines for improving the institutional and functional organization of financial security protection from one of the money laundering mechanisms. The author has used general scientific and empirical research methods and, as a result of their combination, has defended and proposed justified solutions for limiting the legalization of mainly physical property values acquired from crimes and other offences through their cashless transfer across national borders. The content of the work fills a gap and builds on the propositions in the specialized literature that explores the problems of countering money laundering, terrorist financing and proliferation as negative socio-legal phenomena and crimes.

The monograph is a practical-applied research product of Dr. Gergana Yordanova and could be successfully used to improve the activities of intelligence, counterintelligence, operational and investigative bodies specialized in the protection of economic and financial security as part of national security, detection and investigation of money laundering and terrorist financing. Gergana Yordanova has applied the systematic approach to analyze the state of the elements of control of the movement of property values from crime in the context of countering money laundering. Through the synthesis, she has obtained and substantiated new knowledge on the effective mechanism of measures against money laundering and financing of terrorism applied by competent state and supranational structures and authorities. The main goal set by the author has been achieved with a defended thesis of defining the alternative system of completing operations of transferring "dirty" money without delivery, the so-called "Hawala", as a threat to national and international security.

The article titled "Sovereign Debt as an Evolving Challenge of Hybrid Warfare" and the papers "Reforming Sovereign Debt against Hybrid Threats" and "Debt Accumulation as a Hybrid Threat in Contemporary Conflicts" are elements of the monograph "A Model for

Sovereign Debt Management". The works contain matter of a financial-fiscal nature. They result in theoretical justifications of the relationship between the substantive elements of budget deficits covered by newly issued sovereign debt and risks and threats to the financial security of states. The author's thesis has defended that resources for financing deficit state budgets in the context of military conflicts are risky with regard to the stability of financial systems. Through extrapolation, the opinion of experts has developed that the assumption of new sovereign debt and the accumulation of debt disproportionate to the economic condition of the state could have been seen as a hybrid threat to national security coming from the creditor geopolitical entity.

The research papers in the form of the scientific reports "Impact of the Hawala system on financial transactions in the Balkans in the context of migration flows: the case of Bulgaria" and "New Hawala settlement mechanisms in the context of money laundering and terrorist financing" focus on current and socially significant negative processes and phenomena. The author has studied negative trends in the regional geopolitical space conditioned by the implementation of criminal financial transactions and deals in the Balkan Peninsula, using Bulgaria as an example. The paper concludes that new measures and effective approaches should have been taken to ensure the economic and financial security of the jurisdictions where the transactions and operations with "dirty" money take place. In the context of migrant and refugee flows from the Middle East to Western Europe, the impact of new challenges, risks and threats to the financial security of host countries has been described and explained. A comparative analysis and analogy has been used between attempts to use "Hawalah" type transactions in money and payment systems in European countries and their potential regulation and regulation. The substance of the papers is included in the main habilitation thesis.

The scientific papers "Islamic Finance as an Asymmetric Threat to Europe's Financial Security", "New Geopolitical Realities: Orthodox Russia and the Course Towards Islamic Finance", "The Geopolitics of Islamic Finance in Christian Germany", "The Geopolitics of Islamic Finance in Christian Europe" are of similar thematic scope. The author by using general scientific methods examined the economic integration of migrants of Muslim ethnicity in Europe and their traditions and habits regarding economic, financial and payment transactions. Also the activity of credit institutions in European countries in providing services to migrants was studied after replicating the model of the so-called "Islamic banks". Dr. Yordanova described the first financial effects of the integration of Muslim refugees into European society using their traditions and habits in banking and payment transactions. She presented a summary conclusion on the use of Islamic finance in Europe as a new, asymmetric threat against its financial security.

The article and the research papers described and explained the introduction and use of non-traditional forms of monetary and other financial instruments in European countries in the context of economic and financial security risks.

The presentation of significant research results at scientific forums points to the growth of Dr. Gergana Yordanova both as a researcher and as a university lecturer.

The results of the research work of Dr. Gergana Yordanova have direct application in the training of students and postgraduates at HSSE and other higher education institutions. The publications of the candidate for associate professor constitute parts of the information fund of academic disciplines related to anti-money laundering, counter-terrorist financing and proliferation. Their use can also lead to the improvement of the work of specialized bodies in various fields of activity, with an emphasis on the protection of national security and countering crime.

Scientific contributions of the candidate's works

The topics that Dr. Gergana Yordanova developed in her works build on the specialized scientific literature, mainly in the field of countering money laundering and terrorist financing. Her scientific research works reflect the results of analyses of events and social phenomena related to the protection of financial security by effectively limiting the legalization of property values from crime and other offences.

By the use of the systematic approach for modern modelling of the management activities of specialized law enforcement agencies at national and supranational level has led the PhD candidate to substantiated conclusions and recommendations for improving: the control of the movement of currency values; the intelligence, detection and investigation of offences and crimes related to money laundering and terrorist financing through an informal system of money transfers and completed financial transactions, "Hawala" type; the protection of financial security.

Gergana Yordanova has proposed to the specialized audience an author's systematic classification of activities for identifying suspicious with regard to money laundering and terrorist financing transactions and operations of the "Hawala" type, using appropriate criteria. Dr. Yordanova identified the main features of potential criminal elements in the context of money transmission transactions with the completion of 'Hawala' type operations.

By evidence and results from the evaluated works enrich management science in the phases of programming, organizing, directing and controlling activities that involve intelligence, counterintelligence, operational and investigative work and the investigation of the money laundering process in the phases of depositing, layering and integrating criminal assets. The

author's concepts build on established theoretical frameworks in finance, international relations, law, and operational-intelligence theory. The above-mentioned scientific contributions has been proved by the candidate with the publication of research works with a subject in which she specializes, by analyzing some scientific publications, international and national legal acts and partial results of the practical work of the competent authorities.

Originality of the submitted works and reliability of the scientific data in them

The publications submitted for evaluation by the scientific jury are the personal work of the candidate for associate professor.

The methodology used in the research combines various methods, the exercise of which, either separately or in combination, leads to an assessment of the reliability of the data obtained. When reading and evaluating the works of as. Dr. Gergana Yordanova I did not find the presence of plagiarism. The author has provided written reports, which largely reflect the points obtained by groups of indicators for compliance with the minimum national requirements for associate professor in the professional field of "National Security", the contributions to theory and practice contained in the publications and the scientific and practical-applied results obtained. I accept the contributions and scientific results described and explained by Dr. Yordanova in the references attached to the competition materials.

Notes, question and recommendations

I have some comments on the publications submitted by the applicant. There is limited repetition in content between the article and the scientific papers, as well as in the monographs submitted for evaluation. The subject matter, aim, objectives and methods of research in the habilitation thesis are not clearly stated, differentiated and justified. Arguing the research methods separately and in aggregate and applying them would have enhanced the merits of the monograph.

The use of publications by different authors in the research process of money laundering as mutually determined phases, organized criminal activity and crime is limited. For example, there are no citations, resp. works of researchers and experts on the issues of counteracting money laundering and managing the risk of the phenomenon, such as Aldimirov, Bower, Bilo, Bruning, Vitale, Vlajkova, Clever and Crouchton, McDowell, Mobius, Naylor, Nestorova, Novis, Panayotov, Petev, Petrunov, Rosdwell, Stankov, Filchev, Fiese, Ullman, Yanev, etc., are not used. The use of their works in the writing of the main habilitation thesis, especially the second chapter, would enhance its research merits and practical-applied results.

Insufficiently reasoned were the proposals for the criminalization of transactions in the transfer of funds with settlement of the "Hawala" type, on the territory of the Republic of Bulgaria - page 102 of the main habilitation thesis.

The critical remarks do not affect the overall positive evaluation of the candidate's work.

I have a question for Dr. Yordanova: *"In what dimensions can a difference be sought between the meaningful aspects of the concepts of "money laundering" and "financing of terrorism" in the context of the protection of financial security as part of the national security of the Republic of Bulgaria?"*

My recommendations for the development of the scientific and teaching activity of Dr. Gergana Yordanova are in the field of the subject matter, covering theoretical formulations in the academic disciplines she applied to teach. To continue to follow and develop money laundering issues using the mechanism of 'Hawala' type transactions and operations and the necessary controls by specialised law enforcement agencies to counter it.

Conclusion

The research works of assistant doctor Gergana Dimitrova Yordanova deserve a general positive evaluation. She is familiar with some of the literature and other sources on the researched problems and uses them with a creative approach. The candidate's scientific parameters meet the legal requirements for obtaining the academic position of Associate Professor in the professional field of National Security.

Given the above, I propose to the scientific jury to rank the only candidate for participation in the competition. I recommend Faculty Council of the National Security and Public Order Training and Research Center at HSSE – Plovdiv should propose for election Dr. Gergana Dimitrova Yordanova as Associate Professor in the professional field of National Security (Anti-Money Laundering and Countering the Financing of Terrorism and Proliferation).

Plovdiv, 07.02.2023

Member of the scientific jury: (n)

Assoc. Prof. Rusi Yanev