

OPINION

By Professor Dr. Stefan Ivanov Michev,
professor in the "National Security" department, in the "Information Sciences"
faculty of the University of Library Science and Information Technologies
for the scientific works of Dr. Gergana Dimitrova Yordanova,
presented for participation in a competition for the occupation of an academic
position "docent" in area 9. "Security and Defense", professional direction 9.1.
"National Security" (Countering Money Laundering and Countering the
Financing of Terrorism and Proliferation)

Sofia

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1. Evaluation of the submitted materials for the competition

Assistant Professor Gergana Yordanova participated in the competition for the academic position of "Associate Professor" with: 1 monograph, 1 book based on a protected dissertation work for the award of the National Academy of Sciences "Doctor", 1 article and 10 reports at international and national scientific conferences , published in collections.

I accept all listed publications for review. In the report on the implementation of the minimum national requirements for the groups of indicators, the points for each of the presented scientific works are indicated according to the requirements. The volume and type of publications for the competition, as well as citations cover 460 points. The reports on classroom teaching employment also prove that, through her overall scientific and teaching activities, assistant professor Gergana Yordanova meets the requirements for the academic position of "associate professor".

2. General characteristics of the candidate's scientific research and applied scientific activity

Due to the limitations in the volume of the opinion, I will dwell in more detail only on the monographic work (habilitation work) "Hawala. Essence. Typologies of Money Laundering, Terrorist Financing and Proliferation“.

The relevance and significance of the topic chosen for development are indisputable, insofar as there is no complete scientific study in which the Arab informal system "Hawala" has been analyzed, systematized and classified as a potential risk to national security (in particular, financial security). The topic is of interest to experts from practice, employees of intelligence, counter-intelligence and counter-terrorism units, as well as to the wider scientific community.

The research is focused on defining "Hawala" as a system, from the perspective of cybernetic principles, in the context of security; its formation as a conceptualization and modus operandi for an alternative cross-border transfer of

funds, without physical transfer; financial and accounting features, including the classification of "white" and "black" "Hawala" settlement transactions in relation to money laundering and the financing of terrorism and proliferation.

Specific case studies and cases from practice, as well as the recommendations of the International Financial Action Task Force against Money Laundering (FATF) regarding the legalization, regulation and control of informal, unregulated, non-bank money transfer systems are discussed. The International Standards for Combating Money Laundering and the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction are also analyzed.

In my opinion, the main objective of developing the monograph - to highlight the unregulated use of the "Hawala" system as a potential threat to financial and economic security - has been achieved.

The possible practical solutions proposed by Assistant Professor Gergana Yordanova for changes in the regulatory framework, increasing the operational capacity and potential of investigators in the anti-terrorist bodies, in the intelligence and counter-intelligence services, as well as strengthening the control functions in relation to ongoing transactions, also deserve a high rating. cross-border money transfer with "Hawala" settlement.

My overall assessment is that the monograph fully meets the requirements for a habilitation thesis, as claimed by Assistant Professor Gergana Yordanova.

In a series of conference reports, Assistant Professor Gergana Yordanova presents the results of her serious scientific research on the new settlement mechanisms of the "Hawala" type in the context of money laundering and terrorist financing, the impact of the "Hawala" system on the financial transactions of The Balkans in the context of migration flows, generating financial security by reforming EU cash transfer mechanisms in the context of migration flows and others.

In addition to the scientific achievements of Assistant Professor Gergana Yordanova, her practical experience in the provision of consulting services, business analysis, trainings and in the creation of documentation regarding regulatory compliance in relation to the prevention and counteraction of money laundering and the financing of terrorism as a co-founder and manager of "Kartal Business Group" EOOD, as well as a National consultant of the project "LIGHT: Legal Competency Preventing Anti Money Laundering/Countering Terrorism Financing: Illuminating Dark Corners" (2020 - 2022), EU Legal Program.

3. Evaluation of the candidate's scientific results and contributions

The contributions of Assistant Professor Gergana Yordanova are not presented in a separate reference, but are part of the summaries of the scientific works. This non-traditional approach does not diminish the value of the candidate's achievements. The contributions are successfully structured as scientific and practical. I accept as credible the contributions in both sections. Among the scientific contributions, I can distinguish those appearing under the numbers 2 and 3, and from the practical ones - 2 and 5.

All contributions in the peer-reviewed papers are the personal work of the author. Some of the contributions need editing because they describe the results of the research, not the moment of the contribution. This note does not cast doubt on my overall positive assessment of the presence of contributions in the research of Assistant Professor Gergana Yordanova.

4. Opinion on the presence or absence of plagiarism

I have not detected plagiarism and I have not received a plagiarism alert in the works of Assistant Professor Gergana Yordanova. The sources used are cited in good faith.

5. Testimonials

I have no major criticisms. My recommendation, in view of the competition for the academic position of "associate professor", to my colleague Assistant Professor Gergana Yordanova, based on the results of her scientific research, is to publish a textbook for the needs of the educational process at the Higher School of Security and Economics - Plovdiv .

6. Conclusion

I positively assess the scientific and teaching activities of assistant Dr. Gergana Dimitrova Yordanova. They meet the requirements of ZRASRB and PPZRASRB and the national minimum requirements for occupying an academic position "associate professor" in the field of higher education 9. "Security and Defense", professional direction 9.1. "National Security".

I propose to the Scientific Jury to vote on a proposal for assistant Dr. Gergana Dimitrova Yordanova to occupy the academic position of "associate professor" at the Higher School of Security and Economics - Plovdiv, professional direction 9.1. "National Security" (Countering Money Laundering and the Financing of Terrorism and Proliferation).

Prepared the opinion:

Prof. Dr. Stefan Michev