

To the attention of

The members of the Scientific jury, formed by Order No. P33-948 of 15.03.2021 of the Rector of Plovdiv University Paisii Hilendarski (PU) for defence of the dissertation of doctoral student Tsvetanka Stefanova Hugasyan from the Department of Public Law at the Faculty of Law (FL) of Plovdiv University

OPINION

by Assoc. Prof. Nadezhda Hristova Hristova, PhD

Faculty of Law, University of National and World Economy

About: Dissertation presented for defence by the doctoral student Tsvetanka Stefanova Hugasyan for obtaining the educational and scientific degree "Doctor" in the field of higher education 3. "Social, economic and legal sciences", professional field 3.6. "Law", scientific specialty/doctoral program "Administrative Law and Administrative Process" on the topic "Conflict of interests and counteraction to corruption in the state administration" with academic supervisor Assoc. Prof. Bogdan Dragnev Yordanov, PhD from the Faculty of Law at Plovdiv University Paisii Hilendarski

Dear members of the Scientific jury,

As a member of the Scientific Jury, formed by Order No. P33-948 of 15.03.2021 of the Rector of Plovdiv University for evaluation of the dissertation entitled "Conflict of interests and counteraction to corruption in the state administration" of the doctoral student Tsvetanka Stefanova Hugasyan from the Department of Public Law at the Faculty of Law at Plovdiv University Paisii Hilendarski, I present you my opinion:

1. General presentation of the procedure and the doctoral student

The doctoral student, Tsvetanka Stefanova Hugasyan, has presented a set of materials on paper and electronic media in accordance with Art. 36 of Regulations for the Development of the Academic Staff of Plovdiv University. She has presented three published scientific articles on the topic of her dissertation. In connection with the accomplishment of the minimum national requirements under Art. 2b, para. 2 and 3 of Academic Staff Development Act of Republic of Bulgaria (ASDARB) and Art. 1a, para. 1 of Implementation Regulations of the Academic Staff Development Act of Republic of Bulgaria (IRASDARB), my assessment of the number of points achieved by the dissertation author on the indicators defined in the Annex to Art. 1a, para. 1 of IRASDARB for the field of higher education 3. "Social, economic and legal sciences", professional field 3.6. "Law" is as follows: for group of indicators A - with a minimum of 50, performance 50; for group of indicators B and C - there are no mandatory minimum requirements; for group of indicators D - with a minimum of 30, performance 30; for group of indicators E and f - there are no mandatory minimum requirements. I consider that Tsvetanka Stefanova Hugasyan meets the regulatory requirements, and in particular Art. 2b, para. 2 and 3 of ASDARB, art. 1a, para. 1 of IRASDARB and Art. 30, Art. 31, Art. 32, para. 2 and Art. 33, para. 1 of Regulations for the Development of the Academic Staff of Plovdiv University, for admission of a dissertation to defence procedure.

2. Topic Relevance

The dissertation presented by Tsvetanka Stefanova Hugasyan is dedicated to important issues, both for theory and practice - conflict of interest and counteraction to corruption in the state administration. The research of the questions posed in the dissertation is a challenge for every researcher, as the problems related to the conflict of interests and corruption are more and more widely discussed in the public space, respectively they cause a growing response. In this regard, the goals and objectives are appropriately and successfully formulated in the dissertation by the doctoral student.

3. Knowledge of the problem

From the content of the dissertation it can be concluded that Tsvetanka Stefanova Hugasyan knows very well the state of the issues she is reviewing. Indicative of the knowledge of the problem is: the overall implementation of the tasks set by the doctoral student in the dissertation; the in-depth study of legal doctrine and case law; the logical and substantiated proposals made in the dissertation for improvement of the institutional framework in order to effectively counteract corruption.

4. Research methodology

In the presented dissertation work "Conflict of interests and counteraction to corruption in the public administration" there are used primarily general scientific methods of knowledge - historical law method, comparative law method, inductive and deductive method, which allows to achieve the goals and objectives of the dissertation.

5. Characteristics and assessment of the dissertation and its contribution

Structurally, the dissertation consists of: introduction (p. 7-13); 4 chapters, dedicated respectively to: the conflict of interests and corruption as phenomena in the public administration (First chapter, p. 13-71); monitoring the level of corruption in Bulgaria - measurement indices (Chapter Two, p. 71-115); opportunities for counteraction and better detection of conflicts of interest and corrupt practices (Chapter Three, p. 115-149); the role of the Commission for Combating Corruption and Confiscation of Illegally Acquired Property (CCCCIAP) and the Law on Counteraction of corruption and confiscation of illegally acquired property (LCCCIAP - SG, issue 7 of 2018, amended and supplemented) in the fight against corruption (Chapter Four, p. 149-214); conclusion (p. 214-218); and references (p. 219-239). The volume of the dissertation is 239 pages.

The presented research has the significance and the necessary qualities of a dissertation for awarding the educational and scientific degree "Doctor". In structural and content terms, the presented dissertation is a very good indicator of creative activity and purposeful research abilities of the doctoral student. This is an in-depth and analytical work. In my opinion, this work is characterized by scientific novelty, relevance, as well as practical orientation.

I evaluate the exposition in the dissertation as purposeful and meaningful. It is accompanied by separate comparisons and distinctions, substantiation of conclusions and proposals. The scientific and scientific-applied contributions of the dissertation are essential and useful for the legal doctrine and practice of the respective state bodies. Some specific scientific and scientific-applied contributions in the dissertation can be pointed out:

1) a useful analysis of the concept of "conflict of interest" in the context of doctrinal opinions on this issue (p. 13 - 21);

2) The analysis of the concept of "corruption" in the context of international legal sources is of significant contribution (p. 22 - 30);

3) The list the prerequisites for corrupt attitudes in society and in particular in the public administration is of contribution nature as well. (p.36 - 38);

4) A very good author's analysis with indication of the weaknesses of LCCCIAP and the Ordinance on the organization and procedure for verification of declarations and establishment of conflict of interests (OOPVDECI), in force since 5.10.2018, which lead to ineffective counteraction to corruption (p. 95 - 87);

5) Very good analysis of the legal means for fighting corruption (p. 149 - 170), including the status and powers of the Commission for Combating Corruption and Confiscation of Illegally Acquired Property) (CCCCIAP) (p. 149 - 155);

6) The analysis of the practice of CCCCIP in connection with the prevention against conflicts of interest and corruption in the state administration is of significant contribution (p. 171 - 173)

7) Very good critical analysis of the regulations governing the ethical behaviour of employees in the state apparatus (p. 173 - 208)

6. Assessment of the doctoral student's publications and personal contribution

The doctoral student has presented three scientific publications: "Economic and social aspects of the manifestation of conflict of interest and corrupt practices." - In: Proceedings of the Annual University Scientific Conference. 28-29 May 2020. Item 9. Scientific field "Social, economic and legal sciences". Veliko Tarnovo: Publishing Complex of Vasil Levski National University, 2020, p. 37-46; "Comparative legal analysis of the concept of corruption at national and international level". - In: Proceedings of the Annual University Scientific Conference. 28-29 May 2020. Item 9. Scientific field "Social, economic and legal sciences". Veliko Tarnovo: Publishing Complex of Vasil Levski National University, 2020, p. 47-56; and "The preventive nature of the declarations under Art. 35 of LCCCIAP as a means of counteracting corruption". - In: Proceedings of the Scientific Conference "Current Security Issues". 22-23 October 2020. Item 3. Scientific field "Social and legal aspects of security and defence". Veliko Tarnovo: Publishing Complex of Vasil Levski National University, 2020, p. 86-95.

The presented publications examine current issues related to the topic of the dissertation. Tsvetanka Hugasyan's personal achievement is the scientific and scientific-applied contributions of the dissertation and the presented scientific reports. The doctoral student correctly referred to doctrinal sources.

7. Abstract

The abstract clearly and precisely states the purpose, object, subject and tasks of the research. It is developed at a good level and fully reflects the content of the dissertation and the results achieved.

8. Recommendations for future use of dissertation contributions and results

Due to the relevance of the researched issues, I recommend Tsvetanka Stefanova Hugasyan to publish the dissertation as a monograph.

CONCLUSION

1. I declare that the dissertation "Conflict of interests and counteraction to corruption in the public administration" contains scientific and scientific-applied results, which represent an original contribution to science and meet the requirements of Art. 6, para. 3 of Academic Staff Development Act of Republic of Bulgaria, art. 27, para. 2 of Implementation Regulations of the Academic Staff Development Act of Republic of Bulgaria, and Art. 32, para. 1 and 2 of Regulations for the Development of the Academic Staff of Plovdiv University. At the same time, this dissertation shows that Tsvetanka Stefanova Hugasyan has in-depth theoretical knowledge and professional skills in the scientific specialty "Administrative Law and Administrative Process" by demonstrating qualities

and skills for independent research. Therefore, the doctoral student meets the requirements of Art. 6, para. 1 of Academic Staff Development Act of Republic of Bulgaria, art. 24-26 of Implementation Regulations of the Academic Staff Development Act of Republic of Bulgaria, and Art. 29, 30, 31 and 32, para. 1 and 2 of Regulations for the Development of the Academic Staff of Plovdiv University.

2. In connection with the above, pursuant to Art. 10, para. 1 of ASDARB, art. 32, para. 1 of IRASDARB and Art. 38, para. 1 of RDASPU, I give my positive assessment of the scientific research conducted by Tsvetanka Stefanova Hugasyan.

3. I propose to the respected scientific jury, formed by Order No. P33-948 of 15.03.2021 of the Rector of Plovdiv University Paisii Hilendarski, on the grounds of art. 11, para. 4 of ASDARB, art. 34, para. 1 of IRASDARB and Art. 29 of RDASPU, to award the educational and scientific degree "Doctor" to Tsvetanka Stefanova Hugasyan in the field of higher education 3. "Social, economic and legal sciences", professional field 3.6. "Law", scientific specialty "Administrative Law and Administrative Process".

Sofia, 7th April 2021

Opinion by:

(Assoc. Prof. Nadezhda Hristova, PhD)