R E V I E W

From: Prof. *Margarita Ivanova Chinova*, Dr.Sc.

For: Competition procedure for the acquisition of the academic position 'Associate Professor' in *scientific specialty 'Criminal Law',* professional field 3.6 *Law* in the Law Faculty of the SU 'St. Clement of Ochrid'

1. Information on the Procedure

The competition has been announced for the purposes of the Department of Criminal-Law Studies of the Law Faculty of the SU 'St. Clement of Ochrid' in ST Issue: 24/17.03.2023. I participate as a member of the academic jury by virtue of Order No RD-38-182 / 21.04.2023 of the SU Rector. Admitted to the competition is only one candidate – Dr. Iva Dimitrova Pushkarova.

2. Presentation of the Candidate

Iva Pushkarova has graduated law from the SU 'St. Clement of Ochrid'. Since 2005 she has been a PhD student and later 'Assistant professor' in the Department of Criminal-Law Studies of the SU Law Faculty where she has defended the PhD thesis entitled 'Forms of Organised Crime under the Criminal Code of the Republic of Bulgaria' (2009) and since 2011 she has been 'Chief assistant professor'. Since 2012 she has been Associate professor in Criminal Law in the Ministry of Interior Academy, where she has achieved habilitation by the monography 'Human Trafficking. Criminal-Law Regime'. Since 2017 she has been a guest-professor in the National Institute of Justice, where she conducts courses on criminal-law aspects of domestic violence, human trafficking, exploitative crime, individualization of grave penalties, pardon and statute of limitations – all of which constantly massively attended. Since 2020 she has been conducting courses on 'Legal Aspects of Cybercrime' and 'Cybercrime and Law' in the master programs of the Faculty of Mathematics and Informatics of the Sofia Technical University as a guest-professor. Until May 2011 she was Executive director of the Bulgarian Judges Association and since then she has been running the reputable research center 'Justice Development Foundation' specialized in multidisciplinary studies on legal problems. During the period January 2012 - November 2017 she was Head of the Pardons Committee with the President of the Republic.

Since 2005 Dr. Pushkarova has constantly been assigned researches and opinions as a national expert or consultant to research initiatives for Bulgaria and other states (among which Macedonia, Montenegro, Croatia, Ukraine, Georgia, the Russian Federation) conducted by the World Bank group, the European Commission, the Council of Europe and reputable international organizations such as the Siracusa Institute on Criminal Justice and Human Rights and the Penal Reform International.

She was awarded the 2012 Sofia University 'Young Scholar' Award.

3. Accomplishment of the Minimal Requirements for the Academic Position

Presented for review are: 1 monography, 3 studies, 6 articles and 13 citations equating to 425 science-metric points, which exceed the minimal threshold of 300 points. The habilitation thesis 'Pardons in the Bulgarian Criminal Law and in the Practice of the Head of the State'. Sofia: Siela, 2020, p. 407, ISBN:978-954-28-3245-4 is a complete and comprehensive monographic research of a certain problem which neither repeats, nor summarizes existing knowledge. Thus is the imperative requirement of Article

24, subparagraph 1, point 3 of the Law on the Development of the Academic Personnel in the Republic of Bulgaria (LDAPRB) fully satisfied. The additionally presented publications are independent scientific works which have not been incorporated in the monography. All of them are original scientific studies which reflect the concepts of their author, with no traces of plagiarism and with appropriate reference to cited works of other authors.

The minimal thresholds as established by all formal quantitative and qualitative groups of indicators are therefore met.

4. Assessment of the Lecturing and Scientific Performance of the Candidate

4.1. Presently Dr. Pushkarova conducts classes in 'Criminal Law – General and Special Parts' in the 'Law' specialty of the Law Faculty of the Sofia University, the lecturing courses on International Criminal Law in the 'Law' and 'International Relations' specialties, as well as the lecturing course 'Crime Affecting International Security' in the LF 'International Security' Master Program. Until 2021 she had been conducting a lecturing course entitled 'Juvenile Justice System' as part of the Master Program 'Social-Correctional and Probation Activities with Delinquents' in the Faculty of Education and Arts Sciences of the Sofia University. Since 2021 she has been supervising foreign students under the LF 'European Master's Programme in Human Rights and Democratisation'. In the last three academic years she has accomplished auditory work load of 450 lecturing hours and 720 seminar hours in the LF which substantially exceeds the minimum requirements for competition eligibility.

Pushkarova is constantly invited for public lectures and seminars by student clubs of different universities, Judiciary institutions (NIJ, PRB, etc.), and the communities of legal practitioners. The trainees unanimously describe her as a charismatic and inspiring professor with abundant and useful interdisciplinary knowledge, devoted to the causes of science and education who extensively applies innovative training methodologies and strives to provide practical skills.

4.2. The total scientific production of Dr. Pushkarova after her PhD dissertation has been defended exceeds 150 publications, *inter alia* 13 books, 4 of which monographies, close to 30 book chapters, approximately 50 articles, 25 scientific conference articles published in conference volumes, approximately 10 studies, and 3 textbooks. The subject-matter scope is exceptionally diverse and includes issues of organised and transborder crime, human trafficking, exploitative crime, sexual crime, hate crime, juvenile delinquency and juvenile justice, human rights, financial and economic crime, including money laundering, tax crime and crimes against creditors' interests, corruption, domestic violence, serial crime, ecology crime, international crimes, system of penalties, Constitutional issues of Judiciary, civil-law issues of marriage, rights of the child, protection against discrimination. The monographs 'Forms of Organised Crime under the Criminal Code of the Republic of Bulgaria' (2011) and 'Human Trafficking. Criminal-Law Regime' (2012) are the first complete legal studies on these topics in Bulgaria, and the monograph 'Criminal-Law Response against Extreme Crime: Death Penalty, Life Imprisonment and Life Imprisonment without Commutation in Bulgaria' (2021) introduces the first complete typology of the jurisprudential practice over the grave penalties in Bulgaria. Such kinds of typologies are not present in the foreign literature as well. The works excel in their interdisciplinary nature and innovative usage of research approaches which are typical for other sciences (including sociology, statistics, economics, philosophy, history, criminology, psychology, ethics), as well as a massive focus on studies of jurisprudence and case law.

The works are intensively cited, also in foreign publications and publications included in global data-bases with scientific data. According to the 'Authors' System the identified references to her publications until May 2023 are 160, with achieved Hirsch Index 5.

Pushkarova is constantly invited to present opinions by the Minister of Justice, Supreme Court of Cassation, Constitutional Court, Prosecution of the Republic of Bulgaria and regular and quested participant in scientific conferences (approximately 60 participations with conference articles for the last 12 years).

I myself personally know Iva Pushkarova as a student of mine and later as a colleague in the DCLS in the SU Law Faculty.

Based on the above, I most firmly state that Dr. Pushkarova is a long recognised and deeply respected scientist and lecturer with excellent reputation among the professional national and international circles where she is held in high esteem not only as a response to her profound and broad knowledge and analytical skills and experience, but also due to her qualities of an involved, responsible, diligent, and objective colleague of principle.

5. General Description of the Publications Presented for Review

5.1. The monograph '**Pardon in the Bulgarian Criminal Law and in the Practice of the Head of the State'** comprises of an introduction, five chapters divided in paragraphs, a conclusion, and a bibliography containing 101 titles (67 in Bulgarian language). The footnotes are 381 in total.

The first chapter 'General Characteristic of the Pardon as a Institute of the Criminal Law' summarizes the fundamental features of the pardon as an institute of the criminal law. The second chapter is dedicated to the types of pardon which have been subjected to comparative analyses in respect to their grounds, restrictions, and scope within the framework of a classification based on a complex set of criteria. The legal effect of each type of pardon is outlined separately and in competition with other types and differentiation criteria have been established to allow solutions in borderline cases. The third chapter presents the implementation of pardon in respect to different types of penalties, which are compared according to their goals, conditions and peculiarities affecting their execution. The fourth chapter 'Application of Pardon in Competition with Other Instruments Commuting the Gravity of the Penalty' studies the competition between pardon and alternative regular instruments which regulate the gravity (proportionality) of the penalty. The fifth chapter 'Application of Pardon In Relation To the Application of A Legal Principle' studies pardon when it has been exercised in order to overcome violations of basic legal principles – legality of the offence and the penalty, prohibition of retroactive implementation of the criminal law, expedience (capacity to achieve legitimate goals) and proportionality of the penalty, equality before the law, best interest of the child, humane-treatment principle.

The structure follows a tree-like ideological structure of presenting of the analyses according to which the first chapter presents in a general and more simplified manner the basic components of the concept of pardon (a logframe) and introduces the basic notions and connections between them, while the next chapters deepen the analyses in specific concrete directions and complications. This has made it possible that all conclusions structurally originate from common logical and legal concepts. The approach has also allowed a study-matter with exceptionally case-specific, diverse, and individual nature which resists systemization, comparisons and generalizations, to achieve comprehensible order. Moreover, it has allowed that the reader is being gradually involved from more abstract to more concrete and complex

issues which would have otherwise remained hard to comprehend or insufficiently justified or their substantiation would have required frequent repetitions, has the approach been different.

The monograph is written in an excellent legal language. The author's style is erudite, engaging, and rich in meaning. The author's presence is strong also due to the expressed personal stands which situate the right to pardon within the context of supreme values such as the rule of law and legal fairness.

5.2. Studies and Articles:

- Студия: **Serial Crime in Bulgaria: Criminological Characteristic and Judicial Practice**. In: Annual Of Sofia University „St. Kliment Ohridski". Faculty of Law, Vol 88, p. 104-134, ISSN (print):0081-1866;

- The study entitled: **Abduction in Cummulation with Other Crimes: Jurisprudence Problems Of Legal Qualification And Penalty Individualisation**. In: Annual Of Sofia University „St. Kliment Ohridski". Faculty of Law, Sofia, 2021, Vol 87, p. 116-152, ISSN (print):0081-1866;

- The study entitled: **Recovery and Reflection Period Granted By the International And EU Law To Victims Of Human Trafficking: European Practice**. In: Annual of the Ministry of Interior Academy, Sofia, MoIA, 2020, Vol. 31, p.67-10, ISBN: 1312-6415;

- The study entitled: **Pardon In Roman Legal Tradition.** In: JusRomanum, Sofia, Sofia University "St. Kliment Ohridski", 2020, Vol. 2, p. 721-741, ISSN (online):2367-7007. The size of the publications justifies its being qualified as a study, although it has been qualified by the author as an article;

- The article entitled: **Maritime Piracy as an International Crime. Differentiation From Similar Crimes Under The National Law.** In: Jus Romanum: Mare Nostrum, Sofia, Sofia University "St. Kliment Ohridski", 2021, p. 456-472, ISSN (online):2367-7007;

- The article entitled: **Pardoning According To the Law of Men and God: A Glance at The Influence Of The Christian Ethics And Doctrine Over Granting Of Supreme Mercy.** In: Law and Religion, Collection of Reports, Sofia, Sofia University "Sw. Kliment Of Ochrid", 2021, p. 347-360, ISBN: 9789540751337;

- The article entitled: **Adaptation of Penalties Imposed By A Foreign Court Within Transfer Procedures Of Bulgarian Nationals.** In: Scholarly Readings: Predictability of Law. Collection of reports. Sofia University "St. Kliment Ohridski", 2021, p. 241-254, ISBN: 9789540754789;

- The article entitled: **Criminal Repression Established For Preventive And Regulative Purposes: Issues In Cases Of Criminal Protection Of Administrative Regulations And Duplicating Administrative And Criminal Offenses.** In: 50 Years Administrative Offences and Penalties Act – History, Traditions, Future. Collection of reports. Sofia University "St. Kliment Ohridski", 2020, p. 228-240, ISBN:9789540749754;

- The article entitled: **Schemes Of Financial And Economic Crime In Europe: Bulgarian Judicial Practice.** In: European Prospects For the Development of Criminal Legislation. Collection of reports. Sofia University "St. Kliment Ohridski", 2014, p. 96-110, ISBN: 9789540737225.

The publications presented for review by Dr. Pushkarova meet both in quality and quantity the minimal national requirements for the scientific field 3.6 Law as established by the LDAPRB, and satisfy the conditions for the assumption of the academic position 'Associate Professor' as set out in the LDAPRB Enforcement Regulation and the additional requirements of the Sofia University.

6. Assessment of the Scientific and Scientific-Practical Achievements

6.1. The habilitation thesis '**Pardons in the Bulgarian Criminal Law and in the Practice of the Head of the State'** is massively contributive. It offers a complete and systemized scientifically substantiated concept of the right to pardon which is subjected to a uniform principle-based approach and is compliant to the needs of the practice. As I share the author's self-assessment of the major scientific achievements, I would like to add the following.

The subject matter of pardon excessively resists systematization because cases are very specific due to their exceptional nature, the different time periods of their occurring, and the differences in their social and legal environment. I claim this from my standpoint of a member and a head of the Pardon Committee for many years. Quantitative approaches based on representative statistical examples are simply inapplicable while the qualitative methods require colossal in size and complexity analysis of all cases which, moreover, should be known in their details. This makes the applied *complex research methodology* an independent and exceptional achievement. It has allowed logical interlinking of the issues under discussion in a monolithic and consistent presentation where all conclusions have been presented from a number of various different viewpoints but still remain subjected to a uniform way of thinking.

It is worth mentioning some accents in this methodology. First, the argumentation and the conclusions are presented based on the pardon cases from the practice but also on the judicial practice on similar or competing institutes and the case law of the ECtHR and the Constitutional Court.

Second, theoretical and practical knowledge are combined via parallel verification and validation of the scientific theses with the view of the context to which they are relevant. Thus the validity of the scientifically substantiated conclusions has been demonstrated on the bases of real cases and in fact the whole work overflows with methodologies, standards and typologies which have been constructed as a result of comprehensive analysis of the practice.

Third, inventive and ingenious is the study of pardon from the perspective of the practical competition with other legal institutes – conditional preliminary release, conditional imprisonment, amnesty, substitution of life imprisonment under Article 38a, subparagraph 3 of the Criminal Code, institutes of the criminal procedural law and the law of execution of penalties. The classic method of abstract comparison of legal institutes by their scope, legal effects, conditions and etc. has been transformed into a method which explores the strengths and weaknesses of implementation of the respective instruments with the view of the achievable final life and legal solutions even though the institute may be applied in an unusual manner. This allows for simultaneous comparison of multiple institutes by concrete aspects of theirs and identification of criteria for preference according to the case-specific circumstances. It also allows for exploration of untypical scopes of application. The approach is very valuable for the practice as well because it builds awareness and sensitivity towards the factual details of the case which is necessary where one pursues fair decisions.

Fourth, the issues from the study matter have been analyzed from the perspectives of a variety of possible solutions, also options alternative to pardon. The interdisciplinary method has linked criteria and standards from different legal branches with each other and with criteria and standards from other sciences. In this way the ECtHR standards on the legitimate aims of the penalty are connected to the national doctrine of the penalty and its goals. The purpose and the effects of different legal institutes have been interpreted from the lens of the goals and effects of pardon and the general principles of the legal

system as elements of the system's unified goal orientation. A number of concepts as established by other humanitarian sciences have been connected to a typically legal argumentation. This is the basis on which the **conceptual model of pardon is built as an element of the overall normative culture of the Bulgarian society**.

The abovementioned adds exceptionally high contributiveness to the following achievements:

- *the first complete typology of the solved pardon cases*, the kind of which is absent in the foreign studies as well. The whole pardon practice since 1945 has been encompassed, while for earlier periods this empirical information has not survived and therefore cannot be studied;

- *the historical periodization of pardon*, consistent with the peculiarities of the legally established pardon model, the features of the holder of the powers to pardon, the practice, and the legal environment. An achievement is the outlining of the evolution of pardon from an expression of the personal morals of the head of the state towards a legal institute, based on objective standards. The factors which impact the normative and practical model of pardon have been scrutinized separately and in their correlation, based on which a system of criteria for assessing their impact has been established and defended. The historical periodization has been methodically linked to the development of the scientific theses and their interpretation. *This approach is novel*. In a time when respect for scientific authorship loses value, the author must be praised for the effort to grant recognition to the work of preceding authors who have constructed their analyses based predominantly on the law as they have had no access to empirical data. Pushkarova's analysis confirms these analyses' validity thus increasing their scientific value. These conclusions are among the scientific achievements of the monography which via them proves the universality of concepts which have already been expressed in science.

- *the classification of the types of pardon* according to a complex criterion, which includes the impact over the legal relations of penalty execution and the past-conviction status of the person with respect to the type of the penalty. Based on this, for each type of pardon a separate system of minimal criteria and approaches has been established, which also constitutes a *standard of proof when pardon is being justified*. A methodology has been constructed for *comparing the effects of the different types of pardon* in similar and various fact situations, as well as in cases of factual and legal complications with the view to selecting the most appropriate solution. A *system of criteria* has been elaborated to sustain differentiation of the two types of partial pardon. Pardon via remission of the unserved part of the penalty is linked to the phenomenon of 'correctional (rehabilitation) regress' which has been substantiated as a typical element of a complex ground justifying this type of pardon.

Entirely developed is the institute of *pardon via substitution of life penalties,* which has been introduced in 2006 for the first time since 1951 and therefore is absent from the scientific literature. This institute faces even greater challenges in terms of generalization and systemization of cases but the author has solved them. A thesis is substantiated that this type of pardon is limited to the right of the head of the state to only substitute the penalty with the next more lenient one or to remit the unserved part. A special *standard of pardon is defended in respect to persons serving life imprisonment without commutation based on indications of correction* (*rehabilitation*). Outlined is the contribution of the Bulgarian pardon practice for the European concept mechanism for '*de facto*' alleviation of the penalty in cases where legitimate grounds for execution have been lost, while these formulae have been linked to the ones used by our national legal system.

The developed and defended *concept of exceptionality of pardon* should be treated as a separate achievement together with the *uniform methodology* which allows recognition of exceptionality in diverse fact situations and has been demonstrated as an applicable standard in case-examples from the practice. Separate contributions, though related to these achievements, are the rationalization of *the priority in principle of the regular institutes for alleviation of the penalty over pardon* and the introduced system of general and institute-specific *criteria for recognition of the priority*.

The work contributes to the *conceptual distinction of pardon and amnesty*. The phenomenon of 'collective pardon' which is not normatively established in Bulgaria has been identified as used in practice and defined by its features. Especially significant are the achievements in respect for the 'partial' amnesty.

Outlined are the *conditions and circumstances under which grounds for pardon may potentially emerge in cases of different penalties and at different stages of their execution.* The isolation penalties have been compared according to their goals, imposition requirements, basic principles, and individualisation rules, but above all according to their peculiarities during implementation. To this end an *innovative multidisciplinary methodology* has been suggested. *The results of this analysis have been integrated in the methodologies* for assessment whether and how the right to pardon should be used.

An explanatory model of the correction (rehabilitation) process has been developed to serve the purposes of pardon. The concept has been given definition, criteria for assessing the correction completeness, features to allow this assessment and factors which impact them. Arguments have been given to the concept that in respect to the regular penalties the correctability of the perpetrator is presumed and not subjected to proof, while his/her incorrectability as a mandatory requirement of the penalty of 'life imprisonment without commutation' must be proven beyond reasonable doubt. A classification of the types of correctional process has been proposed which facilitates not only pardon decision-making but also the application of competing institutes. Based on these results, a methodology is suggested for *prognostication of correction* for the purposes of both the primary individualisation of the penalty and during the follow-up execution of the penalty.

A thesis has been defended that probation measures cannot be independently pardoned either as elements of the penalty of probation, or as measures imposed during the probation periods of conditional imprisonment and conditional preliminary release

The powers to pardon and the powers of the head of the state to remit non-collectable state claims have been differentiated. A view is defended that the penalty of fines establishes obligations which fall within the scope of the powers to remit claims and the risks which originate from the factual confusion of the two powers where only the powers to pardon are transferable to the Vice-President have been clarified.

The work reveals the author's skills not only in the constructions of typologies and models, but also in identification of complex problems in cases of competing or concurring implementation of different legal institutes. The monograph is rich in analyses and solutions in cases of factual and legal complications, including cases of multiple penalties, multiple, pardon, conviction for multiple crime, and penalties which have been achieved after adaptation of a foreign sentence.

Violations of fundamental legal principles which might potentially give rise to grounds to pardon– legality of the offence and the penalty, prohibition of retroactive implementation of the criminal law, expedience (capacity to achieve legitimate goals) and proportionality of the penalty, equality before the law, best interest of the child, humane-treatment principle - have been systemized. Methodologies have

been introduced to allow identification of the affected principle, assessment of the extent of the violation, and evaluation of the violation's consequences and approaches and standards belonging to the respective specialised legislation have been integrated. Approaches have been developed to secure combined response to cases of violations which require the application of multiple institutes.

A conclusion has been reached that the pardon practice is directly linked to the functioning of the whole legal system of criminal justice and the statistical Pardon Index has been defended as one of the general indicators of the system's maturity which has been applied in the comparative legal analyses.

I fully support the *de lege ferenda* proposals which I find unnecessary to repeat here. However, I insist on mentioning their being concrete, resourceful, and directly linked to the conceptual conclusions.

The practical usefulness of the work may briefly be defined by its significance of guidelines for solving pardon cases. This makes the work especially valuable for the head of the state and the advisory body of the Pardons Committee because it significantly facilitates the taking of knowledge-based, principle-based and consistent decisions with predictable effects but also for other categories of legal practitioners and a broad spectrum of experts who are engaged by penalty issues.

Very rare is a study so contributive not only in respect to its main study subject but also in respect to a number of supplementary questions. Exceptionally intriguing are the accompanying analyses of the interaction between legislation and jurisprudence and the usage of pardon as an instrument which may both disturb and improve the balance between them. Separate achievements have already been mentioned in the fields of penalties, regular institutes for alleviation of penalties, application of legal principles, etc. In addition it must be noted that the suggested classification of the penalties in regular and exceptional is consistent with the separate classification of the alleviating legal institutes in regular and exceptional (pardon), as well as the separate classification of the latter according to their applicability in the primary or consecutive individualisation of the penalty. Each classification has been based on substantiated criteria, while all conclusions have been extracted both from the law and the legal practice. These classifications are subjected to the practical needs of jurisprudence, while the classification criteria and the relevant definitions are linked to the grounds for application and reasoned as considerations for the proposed solutions of competition of institutes. All of this demonstrates a rarely seen broad, rich, rationalized, and insightful scientific vision over diverse and interconnected aspects of legal knowledge and skills for analytical generalization sustaining conclusion which are valid for all legal branches (for example, conclusions made in respect for the legal principles, property-related penalties, rehabilitation process, etc).

It is impressive that despite of its relatively recent publication in the autumn of 2020, by as early as the end of 2022 the monographic research has already been cited in 3 monographs and 1 textbook.

Despite of the exhaustiveness of the habilitation thesis, two of the additional publications which have been presented for review are dedicated again to pardon and have been written after the monograph's publication. By them the author demonstrates her skills in the field of fundamental scientific research which to an extent are in contrast with the strong practice-oriented approaches of the monograph.

6.2. The general review over the additional publications commands the following conclusions. The matters subjected to research are diverse; the analyses are interdisciplinary again and again strongly and critically focused on jurisprudence. The issues studied are useful for the practice; solutions are given to disputable or novel problems related mainly to the qualification of the criminal offense in factual and legal complications and competition of qualifications. Legal knowledge is combined with knowledge and

research methods from the fields of criminology, psychology, economics, history, political sciences. The author freely operates with the subject matter of other legal branches – administrative law, civil law, criminal procedure, Roman public law, international criminal law, and international human-rights law – while the specialised knowledge which has been demonstrated does not belong to the common conventional knowledge that every jurist possesses. This allows for the works to be regarded as contributive in these fields as well – more specifically, in the issues of common legal concept of guilt, the effects of the institute of the reflection-and-recovery period, the elements of the crime of maritime piracy, the significance of the на validity of civil contracts and administrative acts in assessing the legal qualification of the crime, pardon as institute of the Roman law.

The general review of the publications commands the conclusion that they all reveal evenly deep scientific maturity, well-established individual research approach based on a variety of interests and wide interdisciplinary and multidisciplinary knowledge, developed critical author's style and a specific inclination towards comprehensive problem study, systemization of heterogeneous and huge-in-size empirical data, construction of typologies and methodologies for solving complex cases and a strong focus on practical jurisprudential challenges. The publications are subjected to a uniform analytical approach, recognizable author's style and powerful author's presence which allow for their being accepted as conceptually and methodologically connected elements of an integral scientific work.

7. Recommendations and Questions:

I have no serious critical comments or recommendations to the publications presented for review. I would, however, raise the following questions to the author's attention, which might be also treated as encouragements for future research:

- is – and to what extent – the principle of minimum coercion, as developed in the procedural legal branches, relevant to the material grounds for pardon?

- would the author recommend the introduction of new types of penalties and based on what kind of pardon-related considerations?

8. Conclusion

Based on the above, I hereby **give, with most definite conviction, my favourable assessment** and propose to the honorable academic jury to propose to the Faculty Council that ch. ass. Iva Dimitrova Pushkarova, PhD, should be elected Associate Professor in the competition procedure for the acquisition of the academic position 'Associate Professor' in the scientific specialty Criminal Law, professional field 3.6 Law, field of higher education 3. Social, Economic and Legal Sciences in the Law Faculty of the SU 'St. Clement of Ochrid' for the purposes of the DCLS.

Sofia, 30 May 2023

/prof. Margarita Chinova, Dr. Sc. /