

***Human Rights Without Frontiers Int'l***  
***Asbl***

Avenue d'Auderghem 61/16, 1040 Brussels  
Phone/Fax: 32 2 3456145

Email: [international.secretariat.brussels@hrwf.net](mailto:international.secretariat.brussels@hrwf.net) – Website: <http://www.hrwf.net>  
No Entreprise: 0473.809.960



**The rise of nationalisms in Bulgaria  
and their impact on religious freedom**

*Some reflections about the interactions between national identity, nationalism, state and society, with minority religions or beliefs*

By Willy Fautré, director of *Human Rights Without Frontiers*

Conference on 20-21 November 2019 in Strasbourg

“Limitations of religious freedom by privileged state religions (ecclesiae) – particularly in authoritarian states but also in democracies”

Sigmund-Neumann-Institut für Freiheits- und Demokratieforschung e.V.  
Dresden

## **Table of Contents**

I. Introduction

II. Nationalist and aggressive forces responsible for the hostility towards non-Orthodox communities

III. Religious freedom in Bulgaria: The constitutional and legal framework

IV. The fight against discriminatory amendments to the Religious Denominations Act

1. National and international protests
2. The parliamentary debates
3. Rejected amendments of the United Patriots
4. Reaction of the extreme-right nationalist parties
5. Conclusions

V. Social hostility towards Muslims: Karaahmed v. Bulgaria at the European Court in Strasbourg

1. The attack
2. The ECtHR ruling
3. Conclusion

VI. Abuses and restrictions of Jehovah's Witnesses' freedom of religion

1. Violations of the right to publicly share one's religious beliefs in 2019
  - a) 5 January 2019
  - b) 5 April 2019
  - c) 27 April 2019
  - d) 10 May 2019
2. Legal battles against city councils' ordinances

VII. Social hostility towards Jehovah's Witnesses

1. Violent incidents and legal battles against the far-right VMRO
2. Stigmatization by the media
3. Legal battles against hate speech

## VIII. Conclusions

### I. Introduction

Nationalism is a concept that scholars have expressed divergent and even conflicting opinions on, resulting in a failure to reach a consensus on its definition. Nationalism often has a negative connotation when it is related to conflicts and various forms of social hostility, but it can also be a constructive tool in a collective identity-building process in other contexts.

Nationalism is a complex phenomenon and is often closely linked to national, ethnic or religious identity. Many scholars argue that there is more than one type of nationalism and that the word should be used in the plural instead of the singular as each form of nationalism is different, has its own ingredients and manifests itself in different ways.

When a state disregards diversity, otherness and inclusiveness without advocating for or using violence against specific religious groups or their members but does marginalize them, we have to do with some form of “soft nationalism”. However, after a certain threshold of rejection of otherness, the intensity of the national identity professed by the State can lead to “aggressive nationalism”.

Nevertheless, in both contexts there can be nationalist, political, cultural and social movements at work which lead to intolerance, hostility and acts of violence against persons and communal institutions or buildings.

In Bulgaria, nationalism is prevalent in extreme-right political parties and Orthodox movements which permeates other political parties and the whole society. This has led to the politicization of religion and an inflation in influence of the majority religion on politics. The rhetoric of the Bulgarian Orthodox Church is supported by a majority of the population which often leads to political activism and action. This then reinforces the church’s position and societal values while simultaneously disregarding the specific needs of religious minorities.

My reflections will focus on the current negative impact of nationalism and nationalist movements on the lives of members of religious communities that are not mainstream in Bulgaria. They will cover the following issues:

- Nationalist and aggressive political forces behind the hostility towards non-Orthodox communities
- Religious freedom in Bulgaria: Constitutional and legislative framework
- The fight against discriminatory amendments to the Religious Denominations Act
- Social hostility against two religious communities: Muslims and Jehovah’s Witnesses.

## **II. Nationalist and aggressive forces responsible for the hostility towards non-Orthodox communities**

The UNITED PATRIOTS is a nationalist electoral alliance<sup>i</sup> that was formed in August 2014 by three political parties: the Bulgarian National Party (VMRO), the National Front for the Salvation of Bulgaria (NFSB) and ATAKA. This coalition is part of the current government in Bulgaria. On 9 May 2018, they submitted a draft law designed to restrict the rights of non-Orthodox religions.

VMRO (Internal Macedonian Revolutionary Organisation) was a revolutionary national liberation movement in the Ottoman territories in Europe, that operated in the late 19th and early 20th centuries. Its founding theology is anti-Ottoman and so anti-Muslim. It was banned under Communism but was re-established as a right-wing political party in the 1990s.<sup>ii</sup>

NFSB (National Front for the Salvation of Bulgaria) is a nationalist party that was established on 17 May 2011 in Burgas.<sup>iii</sup> The party was a member of the Europe of Freedom and Democracy (EFD) group during the 7<sup>th</sup> European Parliament legislature.

ATAKA asserts that it is "neither left nor right, but Bulgarian". It is considered ultranationalist, racist, anti-Semitic, anti-Roma, anti-Muslim and anti-Turkish.<sup>iv</sup> It is closely tied with the Bulgarian Orthodox Church.

These are the main nationalist forces which threaten non-Orthodox minorities.

## **III. Religious freedom in Bulgaria: The constitutional and legal framework**

The constitution of Bulgaria<sup>v</sup> upholds freedom of religion or belief in Articles 13 and 37, which establish protections for all religions, recognise Eastern Orthodox Christianity as the "traditional religion" of the country and bans the use of religion for violent or political ends.

The main law regulating freedom of religion or belief is the Religious Denominations Act (2002), which provides measures for the legal recognition of religious denominations and communities. Registration is required for all groups if they want to engage in public worship. However, the Bulgarian Orthodox Church is exempt from the registration requirement due to its status as the traditional Church of Bulgaria.<sup>vi</sup> There are currently 156 registered religious groups.<sup>vii</sup>

In the last few years, there have been attempts by far-right nationalist political parties to reduce the rights of non-Orthodox communities and their members.

#### **IV. The fight against discriminatory amendments to the Religious Denominations Act**

In May 2018, the three largest political parties in Bulgaria filed a proposed law that could have been used to hinder the religious activity of religious minorities.

On 11 October 2018, lawmakers approved on first reading changes to the Religious Denominations Act. In large part, the amendments to the law began as an attempt, among other things, to stem any influence from preachers of radical Islam in Bulgaria. The initial version of the law thus provided for several restrictions regarding funding of religious groups from abroad and participation of foreign clergy in religious rituals in Bulgaria. However, the amendments also significantly restrained the rights of minority faith groups by hampering theological schools, clergy training, missionary activity and free worship outside of designated buildings. One of the highly contentious clauses insisted on a denomination having at least 300 members to apply for official registration. Later on, the required membership number for official registration as a religious group was increased to 3,000!<sup>viii</sup>

This legislation would effectively limit the right to open religious schools and to train denominational ministers, as well as exclude religious communities consisting of less than 1% of the total population from State subsidies. Such a restriction would have discriminated against the Catholic Church (0.7%), the Protestant denominations (0.9% combined) and the Jewish community (only 700 members only). In fact, only the Orthodox Christian and Muslim communities have more than 1% of believers with 60% and 8% respectively.<sup>ix</sup>

Paradoxically, the bill's proclaimed intent was to fight radical Islam,<sup>x</sup> but its first draft would have given more rights to this religion than to Catholics, Protestants and Jews.

It could be argued that the objective was to destroy non-Orthodox movements through law.

OSCE, US and EU institutions expressed serious concerns about the draft law.

##### ***1. National and international protests***

Because these restrictions would be applied generally, this led to objections by other faith groups that would have been affected. Several faith groups also

underlined that it was not appropriate to address a national security issue by rewriting the Religious Denominations Act.

Under this extreme threat, non-Orthodox believers of various faiths in Bulgaria united. Since the initial proposed bill was tabled, they have organized peaceful marches and protests with Bulgarian flags in front of the Parliament in Sofia and in many towns around the country.<sup>xi</sup>

Statements of disagreement with the new legislation were also published by the World Evangelical Alliance (WEA), the European Evangelical Alliance (EEA), the World Methodist Council (WMC), the European Methodist Council (EMC), the Pentecostal European Fellowship (PEF), the Baptist World Alliance (BWA), the European Baptist Federation (EBF), and the Conference of European Churches (CEC).

## ***2. The parliamentary debates<sup>xii</sup>***

On 21 December 2018, Bulgaria's National Assembly approved the second and final reading of amendments to the Religious Denominations Act that had been the subject of controversy since the first reading on 11 October 2018.

The version approved by Bulgaria's Parliament on 21 December designates state subsidies for denominations of more than 1% of the population according to the most recent census.

This means that state subsidies for the Bulgarian Orthodox Church and for Bulgaria's Muslims are guaranteed by the law approved on 21 December. However, subsidies may be voted on for other faiths at the discretion of the government and Parliament.

The amendments stipulate that where a state subsidy is used to pay clergy and employees of religious institutions, their salaries may not exceed the average monthly salary of a teacher.

Informal calculations showed that the Bulgarian Orthodox Church, which has four million believers, would receive 15 million leva (about 7.5 million Euro), while the Muslim community of 600,000 members would get 6 million leva (about 3 million Euro).

The law also requires faith groups to submit to the Cabinet's Directorate of Religious Denominations a list of houses of worship used for services annually, which the directorate will compile in a public register.

### ***3. Rejected amendments of the far-right nationalist parties and their reactions***

The United Patriots, which formed the minority partner in government, were displeased with the amendments to the Religious Denominations Act, especially regarding the rejection of their stricter proposals about state funding and property, as well as other provisions such as the ban on foreign funding.

Iskren Vesselinov said to reporters “Now we are giving millions, and at the same time taking from Turkey, to whom these people will be loyal.”<sup>xiii</sup> This statement refers to the country’s Muslim minority, many of whom are of Turkish descent.

Yulian Angelov, a MP for the VMRO, said that the adopted funding formula within the law was an “insult” to the Church and was “subversive and anti-Bulgarian.”<sup>xiv</sup>

Furthermore, their proposal to set a minimum requirement of having 300 Bulgarian citizens as members to allow formal registration of a religious denomination was voted down. A proposal placing the number at 3,000 was similarly rejected.

Another proposal compelling all religious denominations to fly the Bulgarian national flag outside their houses of worship was also rejected.

One minor victory for the extreme-right parties in Bulgaria was that the Parliament banned the use of loudspeakers and other sound devices by mosques to call their believers to prayer, except for major religious holidays and celebrations.

### ***4. Conclusions***

Thanks to the mobilization of national and international faith communities and human rights institutions, the main provisions violating freedom of religion were removed from the draft law voted on by the National Assembly of Bulgaria on 21 December 2018. This was a great victory for religious freedom in a member state of the European Union and a lesson for the future.<sup>xv</sup>

## **V. Social hostility towards Muslims: *Karahmed v. Bulgaria* at the European Court in Strasbourg<sup>xvi</sup>**

A case filed with the European Court in Strasbourg clearly illustrates the role played by a far-right nationalist political party in the attack on a mosque in Sofia as well as the passivity of the police and the judiciary.

In March 2015, the European Court of Human Rights ruled that Bulgaria violated the right to religious freedom for Muslims by failing to properly investigate a clash between supporters of a far-right party and Muslim worshippers at a mosque in Sofia.

The European Court of Human Rights ruled in the case *Karaahmed v. Bulgaria* that the attack on this mosque in 2011, which authorities failed to prevent, resulted in a violation of Article 9 (freedom of thought, conscience and religion).

The court held the State responsible for its failure to protect the applicant, Veli Karaahmed, and other worshippers from stones and metal pipes thrown by demonstrators. It also criticized authorities' inadequate—and incomplete—investigation into the attack.

### ***1. The attack***

ATTAKA, a nationalist party in Bulgaria, began a campaign in 2006 against what it called the "howling" emanating from the loudspeakers of the Banya Bashi Mosque in Sofia. In May 2011, party supporters mounted loudspeakers on a car and circled close to the mosque, playing recordings of church bells and Christian chants during the regular Friday prayer that was taking place at the time.

During the next Friday prayer, ATTAKA organized a protest next to the mosque, which had been authorized by the mayor. Around 150 ATTAKA members and supporters, including party leader Volen Siderov and other high-ranking officials, gathered directly in front of the mosque near many worshippers.

Waving flags and banners with nationalist slogans, protesters shouted racist insults, including "filthy terrorists," "scum" and "Turkish stooges." One of the participants slowly cut a Turkish fez with a pocketknife while saying, "Can you hear me? We shall now show you what will happen to each one of you!"

The police allowed the demonstration to continue after protesters began hurling stones, wooden flagpoles and metal piping at the worshippers, and even setting fire to prayer rugs. Only after this violence was underway did officers intervene. Five Muslims, five policemen and one ATTAKA MP were injured in the clash, which was widely reported on and filmed by numerous media outlets.

### ***2. The ruling of the European Court of Human Rights***

The European Court of Human Rights ruled that the applicant and his fellow worshippers were victims of an infringement of their freedom to practice their

religion as a result of ATTAKA demonstrators' actions, which the authorities failed to prevent.

In the court's view, given the racist views of ATTAKA on Islam and Muslims, it should have been clear to the domestic authorities what kind of demonstration would coincide with Friday prayers at the mosque. However, no concrete preventive steps to manage the situation were taken until after the demonstration had begun.

It could be argued that the objective of this demonstration was not only about the loudspeaker volume of the Friday call to prayer. The demonstrators voiced slogans that made plain their views of both ethnic Turks and Muslims living in Bulgaria. ATTAKA'S actions were not designed solely to express discontent at noise levels or even to express opposition to Islam but appear to be calculated to cause disruption to worshippers and provoke violence.

The inadequacy of the authorities' actions continued after the attack. The investigation into alleged preaching of religious hatred, opened on 25 May 2011, was still inconclusive nearly four years after the event. No progress had been made in identifying and charging those responsible for throwing objects and setting fire to prayers rugs, even though these individuals can be clearly seen on video recordings.

Finally, with the exception of one ATTAKA official, none of the individuals who took a leading role in the demonstration that day had been interviewed. Therefore, the investigation was an ineffective response to what happened.

The European Court awarded the applicant 3,000 euros for non-pecuniary damages.

### **3. Conclusion**

This decision by the European Court was a strong warning for the Bulgarian law enforcement forces and the judiciary.

## **VI. Abuses and restrictions of Jehovah's Witnesses' freedom of religion<sup>xvii</sup>**

Several municipal authorities in Bulgaria have enacted and enforced unconstitutional local ordinances restricting the right to share one's beliefs in public spaces. Such abuses are regularly challenged in courts.

In March 2019, the Bulgarian Supreme Court of Cassation<sup>xviii</sup> (SCC) issued three separate decisions in favor of Jehovah's Witnesses. These rulings protected their civil rights and freedom of worship. However, this religious community continues experiencing difficulties from officials and private citizens when publicly sharing their faith in some cities.

Moreover, there are a few media outlets that continue to make slanderous comments about Witnesses, which harms their reputation.

### ***1. Violations of the right to publicly share one's religious beliefs in 2019***

- a) On 5 January 2019, two municipal security officers in Kyustendil approached three Witnesses talking to others about their faith while using a portable literature cart. The officers asked them to show their official permit for the cart, even though a permit is not required by law. As the Witnesses did not have such a permit, the officers seized the cart.

The same Witnesses returned later in the day with another literature cart. Another municipality security officer arrived accompanied by an unidentified man who insulted them about their religious beliefs. The Witnesses called the police, but they allowed the municipal security officer to seize the second cart with its contents. The Witnesses filed a complaint with the prosecutor's office, which found that they had not violated the law and ordered that both carts and all of their literature be returned to them.

- b) On 5 April 2019, three municipality clerks and a police officer in Targovishte approached three female Witnesses who were sharing their faith with others. The officials showed the women a municipal ordinance forbidding "advertising" of any religious organization. The three women were issued a notice for violating the administrative code and were then warned that they would be fined if the municipality received future complaints about them.
- c) On 27 April 2019, a man shouted at two female Witnesses while they were sharing their faith with others in Targovishte. He called the police and when the officers arrived the Witnesses explained the purpose of their activity. The officers issued a written warning for violating the public order. They also threatened one of the Witnesses that if they received another complaint against her, she would be arrested.
- d) On 10 May 2019, the Head of Department of Inspection No. 272 in Targovishte approached two Witnesses who were using a portable literature cart while talking to others about their faith. The official ordered

the Witnesses to remove their cart, claiming that they were breaking the law, and requested that they pay a tax.

## ***2. Legal battles against city councils' ordinances***

In the first half of this decade, councils of more than 40 cities passed ordinances restricting the right to share one's beliefs.<sup>xix</sup> Jehovah's Witnesses challenged many of them in local courts. Incidents of violence and administrative penalties escalated the most in Burgas, likely because it is the city where the nationalist party National Front for the Salvation of Bulgaria (NFSB) was established in 2011.

On 4 June 2016, in Burgas, Nikolai Stoyanov was standing by a small literature display on a public street and offering religious publications to passersby. Police charged him with violating the municipal ordinance and fined him.<sup>xx</sup> Similar incidents had taken place in previous months with the same result. The Witnesses challenged the constitutionality of this ordinance and won their cases at the Regional Court of Burgas.

In 2013, NFSB proposed amendments to the ordinance, alleging that some members of the community were disturbed by Witnesses' religious activity in public spaces. The district governor reviewed the amendments and concluded that they were discriminatory. They then issued an order declaring them unconstitutional. However, the next district governor revoked that order, and the city council passed those amendments. The Burgas Ombudsman warned the city council that the new regulations were unlawful, but they remained in effect until the Burgas Regional Court invalidated them in 2016.

Similar incidents occurred in Kyustendil, and the Administrative Court there overturned six criminal rulings and fines imposed on Witnesses for allegedly illegal religious activities. On 24 June 2016, the same court declared the amendments made to the ordinance to be unconstitutional.

Since then, the prosecution of Jehovah's Witnesses has diminished but has not disappeared. In some cities, Witnesses are still threatened and intimidated when publicly sharing their faith with others.

## **VII. Social hostility towards Jehovah's Witnesses<sup>xxi</sup>**

The main drivers behind aggressions targeting Jehovah's Witnesses in Bulgaria are: political and social hostility, stigmatizing media campaigns and police passivity. A few incidents are outlined below:

## ***1. Violent incidents and legal battles against the far-right VMRO***

On 1 July 2018, in Nova Zagora, two Jehovah's Witnesses, Tatyana Borisova Aleksandrova and Maria Isabel de la Mata Palomino de Lopez, were walking down the street when a young man punched them. Both of the women were bruised and distressed after the assault. Two days later, they filed a complaint with the police that included the address of the attacker as it was not his first aggression. The authorities did not prosecute him.

On 23 December 2017, in Vratsa, three Witnesses, Tasho Tashev, Krasa Tasheva and Yuha Hyvenen, were at a cart displaying their publications in Macedonia Square in the city centre. Two men associated with the extreme-right nationalist movement Internal Macedonian Revolutionary Organisation (VMRO), Momchil Yankov and Martin Ivanov, began mocking them. One of the Witnesses filmed the escalating situation on her phone and informed the men that they were being recorded. The men shouted threats of violence, used abusive language and made false allegations against the Witnesses. The Witnesses lodged a complaint against these two members of the VMRO.

In 2019, the Supreme Court ruled in favor of Witnesses against VMRO in a case of violence which occurred eight years earlier. On 17 April 2011, Jehovah's Witnesses gathered to commemorate the Memorial of Jesus' death. An aggressive mob of 60 people, organized by the leader of the VMRO Georgi Drakaliev, brutally attacked the Witnesses. The mob inflicted some injuries, and the victims brought this incident to the courts. The case eventually came before the Supreme Court which, on 20 March 2019, ruled against Drakaliev. He must now compensate the Witnesses.

## ***2. Stigmatization by the media***

Online media has continued to stigmatize Jehovah's Witnesses and publish libelous articles against them.

On 23 May 2019, *Uniconbg* published an article with photographs of Witnesses sharing their beliefs, accusing them of illegally occupying the area where they were carrying out their religious activity.

On 1 April 2019, an online newspaper called *Provaton* called Jehovah's Witnesses a "sect" and claimed that they had deprived local children of the opportunity to practice sports. In reality, the Witnesses had rented the local sports hall for a religious meeting.

On 22 March 2019, *Paragraf 22* posted an online article presenting a negative image of Jehovah's Witnesses.

On 18 May 2018, Petya Petrova posted a stigmatizing article on the website of *Struma* (<https://www.struma.com/>) and publicized the address of where the Witnesses met. Soon after, vandals smashed the windows of the building, causing the owner to cancel his rental contract with the Witnesses. A follow-up article in the same online paper claimed that the owner had evicted the Witnesses.

### **3. Legal battles against hate speech**

In March 2019, the SCC, the highest court of the country, issued favorable rulings in three cases involving Jehovah's Witnesses.<sup>xxii</sup> Two of the cases involved slander from media outlets.

In 2014, *SKAT TV* began broadcasting news reports and television programs slandering Witnesses. On 9 February 2015, Witnesses filed a complaint with the District Court of Burgas, claiming moral damages from *SKAT TV* and its journalists for inciting religious hatred. On 18 March 2019, the SCC ruled in favor of the Witnesses, stating that *SKAT TV*'s statements were defamatory and went beyond the right of freedom of expression. It ordered *SKAT TV* to pay material and moral damages as well as all court costs.

In 2012, the newspaper *Vseki Den* published a libelous article against Witnesses. They filed a civil lawsuit with the Sofia Regional Court but lost their case in all lower level courts. They then appealed to the SCC. On 26 March 2019, basing its decision on its previous ruling in the *SKAT TV* case, the SCC ruled in favor of the Witnesses and awarded non-pecuniary damages.

## **VIII. Conclusions**

Far-right nationalist movements are a constant threat to non-Orthodox religions, especially Muslims and Jehovah's Witnesses. These targeted religious minorities are at the forefront of the legal fight against the intolerance, hate speech and human rights violations perpetrated by vicious political parties. Fortunately, Bulgarian courts are increasingly demonstrating their independence and distancing themselves from these racist and xenophobic organizations. The future of democracy and the rule of law in Bulgaria is in their hands.

*Abstract: Since the collapse of Communism in Bulgaria, freedom of religion of belief and non-discrimination, which implies equality of rights for ALL, has always been a battlefield for nationalist forces.*

*In Bulgaria, nationalism is prevalent in anti-Muslim extreme-right political parties and some Orthodox movements but it also permeates other political parties and the whole society. This has led to the politicization of religion and the*

*increased intrusion of the Orthodox Church in politics. Its aggressive rhetoric targeting religious minorities of foreign origin fuels social and political hostility as well as discrimination.*

*This paper focuses on the current negative impact of nationalism and nationalist movements on the lives of members of religious communities that are not mainstream in Bulgaria. It addresses four major topics:*

- *The identification of nationalist and aggressive political forces behind the hostility towards non-Orthodox communities*
- *Religious freedom in Bulgaria: Constitutional and legislative framework*
- *The fight against discriminatory amendments to the Religious Denominations Act*
- *Social hostility against two religious communities: Muslims and Jehovah's Witnesses.*

---

<sup>i</sup> Far right political party "United Patriots" worrying role in Bulgaria's EU Council presidency, ARDI, 13 October 2017 (accessed 20 September 2019)

<https://www.ardi-ep.eu/far-right-political-party-united-patriots-worrying-role-in-bulgarias-eu-council-presidency/>

<sup>ii</sup> Internal Macedonian Revolutionary Organization, Encyclopedia Britannica, 1 October 2019 (accessed 21 October 2019)

<https://www.britannica.com/topic/Internal-Macedonian-Revolutionary-Organization>

<sup>iii</sup> National Front for the Salvation of Bulgaria, Revolvly (accessed 20 September 2019)

<https://www.revolvly.com/page/National-Front-for-the-Salvation-of-Bulgaria>

<sup>iv</sup> Bulgaria's Ataka Party: An unlikely blend of left and right, Foreign Policy in Focus, 15 August 2013 (accessed 20 September 2019)

<https://fpif.org/bulgarias-ataka-party-an-unlikely-blend-of-left-and-right-2/>

<sup>v</sup> Bulgaria's Constitution of 1991 with Amendments through 2007, Constituteproject.org, 12 August 2019, (accessed 19 August 2019) [https://www.constituteproject.org/constitution/Bulgaria\\_2007.pdf?lang=en](https://www.constituteproject.org/constitution/Bulgaria_2007.pdf?lang=en)

<sup>vi</sup> Religious Denominations Act', Legirel, Centre national de la recherche scientifique, Durzhaven vestnik n.120/29.12.2002, (accessed 9 September 2019)

<http://www.legirel.cnrs.fr/spip.php?article540&lang=fr>

<sup>vii</sup> Bureau of Democracy, Human Rights and Labor, 'Bulgaria', International Religious Freedom Report for 2016, U.S. State Department, (accessed 9 September 2019)

<https://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm#wrapper>

<sup>viii</sup> 3000 members required for a Bulgarian faith group to obtain judicial entity, Evangelical Focus, 22 November 2018 (accessed 10 September 2019)

[http://evangelicalfocus.com/europe/4017/Bulgaria\\_religion\\_law\\_3000\\_members\\_required\\_for\\_faith\\_group\\_to\\_obtain\\_judicial\\_entity](http://evangelicalfocus.com/europe/4017/Bulgaria_religion_law_3000_members_required_for_faith_group_to_obtain_judicial_entity)

<sup>ix</sup> Great victory for religious freedom in Bulgaria, ACLJ, January 2019 (accessed 10 September 2019)

[https://aclj.org/persecuted-church/great-victory-for-religious-freedom-in-bulgaria?utm\\_source=Twitter&utm\\_medium=Informational&utm\\_content=Persecuted%20Church&sf96860237](https://aclj.org/persecuted-church/great-victory-for-religious-freedom-in-bulgaria?utm_source=Twitter&utm_medium=Informational&utm_content=Persecuted%20Church&sf96860237)

=1

<sup>x</sup> Parliament criminalizes propagation of radical Islam on first reading, BTA Bulgarian News Agency, 6 December 2017, (accessed 20 September 2019) <http://www.bta.bg/en/c/DF/id/1704807>

<sup>xi</sup> Bulgarian Christians continue protests, Baptist Standard, 27 November 2018 (accessed 20 September 2019)

<https://www.baptiststandard.com/news/world/bulgarian-christians-continue-protests/>

<sup>xii</sup> Bulgaria's Parliament approves second reading of Religious Denominations Act amendments, The Sofia Globe, 21 December 2018 (accessed 20 September 2019)

<https://sofiaglobe.com/2018/12/21/bulgarias-parliament-approves-second-reading-of-religious-denominations-act-amendments/>

---

<sup>xiii</sup> Ibid xii

<sup>xiv</sup> Ibid xii

<sup>xv</sup> Ibid. ix

<sup>xvi</sup> Case of Karaamed v. Bulgaria (Application no 30587/13), European Court of Human Rights, 24 May 2015 (accessed 27 August 2019)

[https://hudoc.echr.coe.int/eng#{"fulltext":\["Karaahmed%20v.%20Bulgaria"\],"itemid":\["001-152382"\]}](https://hudoc.echr.coe.int/eng#{)

<sup>xvii</sup> Source: Bulgaria, Religious Freedom Issues, Statement by the European Association of Jehovah's Witnesses at the OSCE/ ODIHR HDIM in Warsaw in September 2019, 20 May 2019 (accessed 29 September 2019):

[https://www.osce.org/odihr/hdim\\_2019](https://www.osce.org/odihr/hdim_2019)

<sup>xviii</sup> Supreme Court victories protect religious freedom for Jehovah's Witnesses in Bulgaria, JW.ORG, 20 May 2019 (accessed 20 September 2019)

<https://www.jw.org/en/news/jw/region/bulgaria/Supreme-Court-Victories-Protect-Religious-Freedom-for-Jehovahs-Witnesses-in-Bulgaria/>

<sup>xix</sup> Bulgaria: Religious freedom concerns, Office of General Counsel at World Headquarters of Jehovah's Witnesses, Religious freedom concerns: Statement by the European Association of Jehovah's Christian Witnesses, Organization for Security and Cooperation in Europe, 13 September 2017 (accessed 29 September 2019) <https://www.osce.org/odihr/340956?download=true>

<sup>xx</sup> Will Bulgarian courts uphold religious freedom? JW.ORG, 14 February 2017 (accessed 28 September 2019)

<https://www.jw.org/en/news/legal/by-region/bulgaria/will-bulgarian-courts-uphold-religious-freedom/>

<sup>xxi</sup> Ibid xx

<sup>xxii</sup> Ibid xviii