

Blockchain & Cryptocurrency Regulation

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Government attitude and definition

The Bulgarian Government has not really approached the matter of adopting and regulating cryptocurrencies and has instead been watching from afar over the years. Until recently, the existence and use of cryptocurrencies was hardly discussed by any government officials, and the position of the state on the matter was non-existent, except for the National Revenue Agency (NRA), which has issued numerous explanations on VAT and taxation inquiries regarding cryptocurrencies since 2014.¹

In January 2022, the then acting Minister of Finance said in an unofficial position of the Government that the state is exploring options for a crypto payment mechanism in the short to medium term.² The same intentions were later confirmed in a parliamentary hearing.³

Earlier, in 2019, the Bulgarian Council of Ministers adopted National Programme “Digital Bulgaria 2025” and a roadmap for its implementation with Decision No. 730 of 5 December 2019, which provides encouragement for the implementation and use of innovative technologies such as blockchain, artificial intelligence, etc. through policy development. Digital Bulgaria 2025 also envisages the preparation of an analysis of the possibilities for the application of blockchain in public services of high public interest such as tax, insurance, etc.⁴

The Bulgarian National Bank (BNB) has mainly followed the European Central Bank on any policies and positions regarding cryptocurrencies. For example, in 2019, a warning on the volatility of crypto-assets was published by the BNB, after the same warning was issued by the European Central Bank.⁵ In two interviews in 2022, the BNB Deputy Governor in charge of the Banking Department expressed the general unofficial opinion that cryptocurrencies are unregulated in Bulgaria in every aspect, except for anti-money laundering (AML) purposes, and will remain unregulated until general European legislation is adopted.⁶

The Financial Supervision Commission (FSC) has followed the general position of the BNB and has issued separated warnings in 2022 regarding the volatility and unregulated nature of crypto investment funds.⁷

Despite the warnings issued over the years, however, the position of the Bulgarian Government and state authorities on cryptocurrencies seems to be rather positive and open. It is expected that the Bulgarian Government will follow EU policies on cryptocurrencies and no national legislation is expected to be introduced until general European regulation is adopted.

Cryptocurrency regulation

As of 2022, the first and sole legal definition in Bulgarian legislation that deals with cryptocurrencies can be found in item 24 (*State Gazette, Issue 94 of 2019*) of § 1 of the Additional Provisions of the Measures Against Money Laundering Act (MAMLA), which

describes “virtual currencies” as “*a digital representation of value, that is not issued or guaranteed by a central bank or a public body, is not necessarily related to a statutory currency and has no legal status of currency or money, but is accepted by natural or legal persons as a medium of exchange and can be transferred, stored and traded electronically*”. This definition is also referred to in item 1 of § 1 of the Additional Provisions of Ordinance No. H-9 of 7 August 2020 on the terms and conditions for entry in the register of persons who, by occupation, provide services for exchange between virtual currencies and recognised currencies without gold coverage, and to wallet providers that offer custodial services, issued by the Minister of Finance.

Furthermore, a “wallet provider, offering custodial services” is defined as “*a natural or legal person, or other legal entity, providing services for the protection of private cryptographic keys on behalf of its clients for owning, storing and transferring virtual currencies*” according to item 25 (*State Gazette, Issue 94 of 2019*) of § 1 of the Additional Provisions of MAMLA.

These definitions were introduced by the 5th Money Laundering Directive (Directive (EU) 2015/849) and have been adopted by Bulgarian authorities.

In addition to the above, there are no specific cryptocurrency or fintech laws that have been enacted or are being currently prepared. It is expected that the national regulators will strictly follow any European regulation in the field when passed.

Case law

The lack of regulation on cryptocurrencies raises the question of whether there are any licensing requirements for companies providing services related to cryptocurrencies. A cornerstone case law established that the scope of activity of a company, such as “*mining and trading in virtual currencies, financing through virtual currencies*” or “*mining and sale of virtual currency, purchase and sale of machines and devices for mining virtual currency*”, are activities that do not fall within the scope of Art. 12, Para. 3 or Art. 4 of the Payment Services and Payment Systems Act (*State Gazette, Issue 20 of 2018*) (PSPSA), which exhaustively lists the payment services for which a licence is required for implementation.

In Decision No. 32 of 15 January 2018 under File No. 17/2018 of the Plovdiv District Court, it was accepted that the activity of “*mining and trading in virtual currencies, financing with virtual currencies*” does not constitute a payment service under the meaning of PSPSA and is therefore not subject to licensing under the same law. Acquisition, trading and payment with virtual currencies are activities that are also not regulated by current Bulgarian and European legislation and are not subject to licensing. Virtual currencies do not constitute a financial instrument within the meaning of Art. 3 of the Markets in Financial Instruments Act (*State Gazette, Issue 15 of 2018*) (MFIA), as in the declared subject of activity there are no unambiguously defined activities of an investment intermediary or activities and services in the sense of Art. 5, Paras 2 and 3 of MFIA, for which licensing is required by the FSC. In its decision, the District Court referred to Decision No. 834 of 24 April 2015 under File No. 984/2015 of the Sofia Court of Appeal,⁸ as well as to the statement required for the case with Ref. No. BNB – 108809 of 19 September 2014 of the Deputy Governor of the BNB and statement with Ref. No. 07-00-114 of 23 October 2014 of the FSC.

Opinion of the BNB

According to statement Ref. No. BNB – 108809, the virtual currency Bitcoin is not legal tender. Bitcoin acquisition, trading and payment activities are not regulated by applicable national and European legislation and are not subject to licensing or registration. The purchase and sale of virtual currencies and their payments, including Bitcoin, do not fall within the scope

of Directive 2009/110/EC of the European Parliament and of the Council of 16 September 2009 on the taking up, pursuit and prudential supervision of the business of electronic money institutions or Directive 2007/64/EC of the European Parliament and of the Council of 13 November 2007 on payment services in the internal market, within the scope of the Personal Data Protection Act, which transposed these European acts into Bulgarian law.

Opinion of the FSC

In statement Ref. No. 07-00-114 of 23 October 2014, the FSC expressed the opinion that activities related to the acquisition, trading and payment of Bitcoin are not regulated by the current European and national legislation and are not subject to licensing and registration. Art. 3 of MFIA explicitly lists the financial instruments that are subject to FSC regulation. Bitcoin and other virtual currencies are not recognised or treated as financial instruments within the meaning of MFIA and should not be subject to its requirements. For concluding transactions with Bitcoin, it is not necessary to issue a licence from the FSC for carrying out investment activity and providing investment services within the meaning of Art. 5, Paras 2 and 3 of MFIA. It is noted that given the nature of Bitcoin and other similar cryptocurrencies, exceeding 200 different types, they could represent and/or serve as an underlying asset of derivative financial instruments, which is not currently reflected in existing regulations. It is concluded that the rules of MFIA would be applicable to the aforementioned activity only if it includes activities related to the offering of financial instruments whose underlying asset is Bitcoin, such as contracts for differences or derivative instruments, for which it is necessary to hold a licence to operate as an investment intermediary.

In more recent publications, the FSC has confirmed its position that cryptocurrencies in Bulgaria are not regulated under the Public Offering of Securities Act or MFIA,⁹ and that it does not supervise blockchains, cryptocurrencies, crypto whitepapers¹⁰ or initial coin offerings (ICOs).¹¹

Crypto-licence and crypto-register

MAMLA legally obliges crypto-asset exchanges and custodial wallet providers to register in a public register, which is kept and maintained by the NRA.¹² Upon registration, a company certificate is issued, which has come to be known in practice as a crypto-certificate or crypto-licence, and is the only state authority-issued document in Bulgaria that grants provision to companies to perform crypto-related services and activities in accordance with current legislation.

The procedure is detailed in an Ordinance¹³ issued by the Minister of Finance. The obliged entities have to register *prior* to the commencement of their activity as crypto-asset exchanges and/or custodial wallet providers. There are no special capital requirements for companies applying for the crypto-certificate, or special personal requirements for persons in managerial positions. Bulgarian legislation does not restrict foreigners with no Bulgarian or EU citizenship from being appointed as managers, directors, or AML or data protection officers in private sector companies.

As of 2020, the state fee, according to Art. 41 of Tariff No. 12 for fees collected in the system of the Ministry of Finance under the State Fees Act, is BGN 50 for entry into both the crypto-services register and the custodial services register.

Sales regulation

Financial instruments and regulated investment financial services are specified in MFIA (*State Gazette, Issue 15 of 2018*). MFIA itself does not recognise cryptocurrencies as a

financial instrument. Thus, cryptocurrencies in general are considered commodities, and trades will be regulated under the Obligations and Contracts Act and the Commerce Act. The general rule is that under the contract of sale, the seller assumes the obligation to transfer to the buyer the ownership of a chattel or another right for a price that the buyer assumes the obligation to pay to the seller.

If a natural person purchases cryptocurrencies, case law¹⁴ accepts that the transfer of cryptocurrency is not a commercial transaction pursuant to the Commerce Act. In this regard, disputes regarding cryptocurrency transactions are dealt with under the General Claims Procedure and not under the Commercial Disputes Procedure under the Bulgarian Civil Procedure Code.

Furthermore, case law¹⁵ accepts that consumer protection under the Consumer Protection Act will be generally inapplicable if a person acquires cryptocurrencies for investment purposes, i.e. to sell and trade for profit.

Taxation

Crypto-assets (digital currencies, virtual money, electronic funds) are acknowledged by the Bulgarian tax authorities based on the following statement from the European Bank Authority: *“Virtual currency is a digital representation of value which is not emitted by a Central Bank or public institution, nor is indispensably correlated to fiat money, but is accepted by natural persons and legal entities as means of payment and can be transferred, stored or traded electronically.”*

The NRA identifies a few taxable propositions in regard to crypto-assets, including: income from trading or exchange of virtual assets; income from acquiring or mining of virtual assets; income from crypto-to-crypto exchange; and income from staking. For each category, the NRA identifies two tax-liable parties: natural persons; and legal entities.

As regards taxation, any income from trading or exchange of virtual assets is considered income from sale of financial assets and taxes are therefore due on it. Personal income tax law or corporate tax law, however, have no clear definitions of virtual currency or cryptocurrency. The general rule suggests that the closest definition may or will be applied in regard to the queried term.

Income from trading or exchange of virtual assets:

- Taxable income from the sale or exchange of financial assets is the sum of realised profit within the taxable period (year), defined for each separate deal, reduced by the sum of realised loss within the taxable period, defined for each separate deal. The sum of the net result of all deals forms an annual taxable base and is declared in the annual tax return.
- No specific documents for transfer of rights or property are regulated. All related documents must be archived for a period of five years after the tax-due period. No advance tax is due for virtual currencies.
- If the trading is conducted through a legal entity as regular activity, the assignable costs might reduce the net taxable profit.

Income from acquiring or mining of virtual assets:

- Income from acquiring virtual currencies is income from economic activities as defined in the Income Taxes on Natural Persons Act (*State Gazette, Issue 95 of 2006*). Purchasing equipment for crypto mining or gaining profit from mining activities and subsequent selling of the mined virtual currencies qualifies as economic activity and the taxable result is formed by the definitions of the Corporate Income Tax Act (*State Gazette, Issue 105 of 2006*).

- If the mining or acquiring is conducted via a legal entity, the assignable costs might reduce the net taxable profit.

The annual taxable base can be formed from exchanging one crypto-asset to another if the newly acquired asset valuation is profitable. In Bulgaria, unrealised profit from the sale or exchange of financial assets is taxable.

Annual currency revaluation is a non-tax-deductible item and is qualified as a temporary tax difference.

Staking is considered a profit-gaining activity that is not clearly defined in the Income Taxes on Natural Persons Act or the Corporate Income Tax Act. For natural persons, it is fair to say that staking does not qualify as economic activity from trading or selling, nor as an interest-gain activity, and taxes are not undoubtedly due. For legal entities, however, any acquisition of a digital asset must be entered (based on National Accounting Standards) as an increase of intangible assets and must therefore be re-evaluated regularly at a fair or market price. This may have an immense impact on the net annual financial taxable result.

Reporting of crypto-asset holdings

The legislation in force in Bulgaria does not explicitly require natural persons to declare crypto holdings at the end of the year in their tax returns. For legal entities, however, they must report their holdings in their annual financial statement, but again not in the tax return.

Crypto and VAT

Based on the Value Added Tax Act (*State Gazette, Issue 63 of 2006*), dealing with crypto-assets is considered equivalent to providing financial services and is therefore treated as VAT-exempt, i.e. 0% VAT is applied. If an entity reaches the threshold of BGN 50,000 in turnover for 12 consecutive reporting periods (months), compulsory VAT registration is due, whilst continuing to treat crypto sales as VAT-exempt. Bulgarian Parliament voted for a change from January 2023 to increase the turnover threshold for VAT registration to a minimum of BGN 100,000 for 12 consecutive months.

Tax rates

Tax rates in Bulgaria are fixed to 10%. Both corporate income and personal income tax are subject to a 10% flat rate. There is an additional dividend paid tax at a 5% rate, which is applied when limited liability companies distribute dividends to their stakeholders, or when self-employed persons register for the purposes of crypto trading as an economic activity. We can conclude that the effective tax applied over crypto-gaining activities is 15%.

Money transmission laws and anti-money laundering requirements

MAMLA (*State Gazette, Issue 27 of 2018*) adopted the 5th Money Laundering Directive (Directive (EU) 2015/849) and provided that measures for the prevention of the use of the financial system for the purposes of money laundering shall be binding for persons who, by way of their business, provide exchange services between virtual currencies and fiat currencies and custodian wallet providers (Art. 4, items 38 and 39 of MAMLA), such as:

- customer due diligence;
- collection and preparation of documents and other information;
- retention of documents, data and information;
- assessment of the risk of money laundering and terrorist financing; and
- disclosure of information on suspicious operations, transactions and customers.

Customer due diligence can be simplified, enhanced or complex. In practice, when entering into crypto business relationships, simplified due diligence is not applicable, nor is it applicable in any non-face-to-face environment since most crypto activities are carried out

digitally, including all preceding communication. Standard complex due diligence must be performed in any case of transactions above EUR 15,000 or the equivalent thereof in another currency, regardless of whether that operation or transaction is carried out in a single operation or several.

Apart from the obligation for crypto-services providers to register in a public register, kept and maintained by the NRA, there are no specific or additional AML duties for companies dealing with or providing cryptocurrency services.

The general provisions of MAMLA bind the companies to adopt internal rules on money laundering and terrorist financing control and prevention and to have policies on the disclosure of information and reporting to the state authorities. Companies can establish specialised departments for AML compliance or may exercise internal control over the fulfilment of their obligations through the company managers, directors or representatives.

Promotion and testing

No government-sponsored promotion and testing programmes regarding cryptocurrencies are currently in place in Bulgaria, but there are indications that some government agencies are trying to make up for time lost (see the “*Government attitude and definition*” section above).

Advertising of cryptocurrencies is not prohibited nor regulated in any specific way. A recent case law¹⁶ established that crypto advertising is not regulated, but should not breach the general prohibition of misleading or comparative advertising. In order for a violation of the prohibition on misleading advertising to be fulfilled, several prerequisites must be met in cumulation: (1) the presence of advertising in the sense of § 1, item 11 of the Protection of Competition Act must be established; (2) the advertising message misleads or may mislead the persons to whom it is addressed or reaches; and (3) the advertising may influence the economic behaviour of the subjects, thus causing or being capable of causing damage to a competitor.

Ownership and licensing requirements

As elaborated in the “*Cryptocurrency regulation*” section above, there are no specific restrictions or licensing requirements when it comes to purchasing, holding or selling cryptocurrencies from the customer’s perspective. The general rule is that all property of natural and legal persons may be considered belongings with the exception of those that, under the Constitution of the Republic of Bulgaria, are exclusive state property or are public, state or municipal possessions, as stipulated in Art. 28 of the Ownership Act (*State Gazette, Issue 92 of 1951*). Under Bulgarian law, persons between the ages of 14 and 18 are minors, but even as minors they can undertake legal action with the consent of their parents or custodians, or may conclude small ordinary transactions and dispose of their earnings on their own without any consent for the purposes of meeting their current needs (Art. 4, Para. 2 of the Persons and Family Act, *State Gazette, Issue 182 of 1949*). Legally speaking, even minors can acquire cryptocurrencies in small quantities, without any consent of their parents or custodians, and can even trade in cryptocurrencies.

No general prohibition or regulation is enacted for acquiring or trading in cryptocurrencies that are owned or issued by legal entities. Companies can even accept pledging in cryptocurrencies as collateral for giving loans without triggering any special regulatory regimes regarding cryptocurrencies.¹⁷ However, in 2022, the FSC published a warning about investing in crypto funds,¹⁸ in which it admits that “*most cryptocurrency investment*

opportunities are beyond the scope of regulation at this stage”, but “hedge funds, alternative investment funds and their equivalents must meet certain legal requirements” when investing in cryptocurrencies. The warning seems to follow the position of the European Securities and Markets Authority (ESMA), which, in December 2021, took a step further in recognising alternative investment funds (AIFs) as funds that can entirely invest in cryptocurrencies.¹⁹ When asked whether managers of undertakings investing in crypto-assets are subject to the Alternative Investment Fund Managers Directive (AIFMD), ESMA responded: “As the AIFMD does not provide for a list of eligible or non-eligible assets, AIFs may in principle invest in any traditional or alternative assets as long as the AIFM can ensure compliance with the AIFMD. However, more specific investment and risk diversification requirements for AIFs investing in crypto-assets as well as limitations regarding the target investors of such AIFs may exist at national level.” This position corresponds to Consideration 10 of the AIFMD, which states that “this Directive does not regulate AIFs. AIFs should therefore be able to continue to be regulated and supervised at national level”.

Mining

Mining cryptocurrencies is not yet regulated in Bulgaria and is thus currently permitted. Almost all cryptocurrency mining litigation is about electricity bills, tax deductibility of various expenses, illegal connections to the electricity grid, or often all of the above. However, even with these cryptocurrency mining issues circulating in the media for years, no public proposal to ban cryptocurrency mining has been made, nor is one expected in the foreseeable future.

Border restrictions and declaration

There are currently no border restrictions or requirements to declare cryptocurrency holdings when entering or leaving Bulgaria; however, individuals carrying cash equivalents of EUR 10,000 or more must declare this before Customs.²⁰ Cryptocurrencies are not regarded as cash in Bulgarian legislation nor in Regulation (EU) 2018/1672 of the European Parliament and of the Council of 23 October 2018 on controls on cash entering or leaving the Union, nor are they regarded as “commodity used as a highly-liquid store of value” in any Bulgarian or European regulation in force.

Reporting requirements

There is currently no reporting requirement strictly for crypto-asset payments regardless of transaction value. However, in case of suspicion or awareness of money laundering or involvement of proceeds in criminal activity, persons entered into the crypto-register of the NRA under MAMLA have the general obligation to promptly notify the Financial Intelligence Directorate of the State Agency for National Security. Furthermore, in any case of a cash payment above BGN 30,000, the obliged entities under MAMLA must notify the same Directorate. It should be noted, however, that cash payments above BGN 10,000 are forbidden in Bulgaria, according to the Limitation of Cash Payments Act (*State Gazette, Issue 16 of 2011*), and fines are imposed in such instances.

As elaborated in the “Taxation” section above, the legislation in force in Bulgaria does not explicitly require natural persons to declare crypto holdings. For legal entities, however, they must report such holdings in their annual financial statement.

Estate planning and testamentary succession

There are no specific rules as to how cryptocurrencies are treated for purposes of estate planning and testamentary succession and thus, the general civil law rules apply. Cryptocurrencies can be included in estate planning/testamentary succession, or form part of a deceased person's estate. Testamentary dispositions have no limit to what can be included from the estate, but there are some restrictions regarding the descendants, parents or a spouse, which may claim the right of a reserved share.

Inheritance tax is not to be paid by the surviving spouse of the deceased or by his or her lineal heirs, but any other heir or legatee should pay inheritance tax for a portion of the inherited estate exceeding an evaluation of BGN 250,000, ranging from 0.4% to 0.8% for siblings and the children of siblings as heirs, and from 3.3% to 6.6% for any other heir or legatee. In the case of inheriting cryptocurrencies, the tax should be formed over their fair market evaluation, according to Art. 33, Para. 1, item 5 of the Local Taxes and Fees Act (*State Gazette, Issue 117 of 1997*), at the time of the occurrence of inheritance.

* * *

Endnotes

1. The earliest traceable NRA publication dates from 8 July 2014 as Explanation No. 53-04-273 regarding tax treatment under VAT and the Corporate Income Tax Act of transactions with the virtual currency Bitcoin.
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3. 24th session of 47th National Assembly of the Republic of Bulgaria, Sofia, 4 February 2022 (<https://www.parliament.bg/bg/plenaryst/ns/57/ID/10617>) (accessed 28 August 2022).
4. Ministry of Transport and Communication, National Programme "Digital Bulgaria 2025" and the roadmap for its implementation are adopted by CM Decision No. 730 of 5 December 2019 (<https://www.mtc.government.bg/en/category/85/national-program-digital-bulgaria-2025-and-road-map-its-implementation-are-adopted-cm-decision-no-73005-12-2019>) (accessed 28 August 2022).
5. BNB, ESAs warn consumers of risks in buying virtual currencies (https://www.bnb.bg/BankSupervision/wwwBSCustomersInformation/index.htm?toLang=_EN) (accessed 28 August 2022).
6. Interview with Mrs Nina Stoyanova, BNB Deputy Governor in charge of the Banking Department, *The Banker*, pp 4–5, 14 January 2022 (https://www.bnb.bg/AboutUs/PressOffice/POStatements/POADate/03_STOYANOVA_20220114_EN) (accessed 28 August 2022); Interview with Mrs Nina Stoyanova, BNB Deputy Governor in charge of the Banking Department, for bTV, 22 February 2022 (https://www.bnb.bg/AboutUs/PressOffice/POStatements/POADate/03_STOYANOVA_20220222_EN) (accessed 28 August 2022).
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8. The Court of Appeal draws the same conclusions as the Plovdiv District Court.
9. FSC, Risks Arising from Investments in ICOs (https://www.fsc.bg/?page_id=15930) (accessed 28 August 2022).

10. FSC, Basic Concepts Related to ICOs (https://www.fsc.bg/?page_id=15927) (accessed 28 August 2022).
11. FSC, Regulation of ICOs (https://www.fsc.bg/?page_id=15929) (accessed 28 August 2022).
12. MAMLA, Art. 9a. (New, SG, 94/2019): (1) for the purposes of the measures against money laundering and terrorist financing, the persons under Art. 4, items 38 and 39 shall be entered in a public register, kept and maintained by the NRA; (2) entry in the register under Para. 1 shall be carried out under the conditions and in a procedure determined by an Ordinance of the Minister of Finance; and (3) for entry in the register under Para. 1, fees shall be collected under a tariff, approved by the Council of Ministers.
13. Ordinance No. H-9 of 7 August 2020 on the terms and conditions for entry in the register of persons who, by occupation, provide services for exchange between virtual currencies and recognised currencies without gold coverage, and to wallet providers that offer custodial services.
14. Decision No. 308 of 24 July 2019 under File No. 424/2019 of the Plovdiv Court of Appeal and Decision No. 495 of 15 May 2019 under File No. 21/2019 of the Kardzhali District Court.
15. Decision No. 2597 of 12 December 2019 under File No. 2635/2019 of the Plovdiv District Court.
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17. Decision No. 7125 of 9 December 2020 under File No. 6656/2020 of the Sofia Administrative Court.
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Ivan Nikolaev, attorney at law, is the managing partner at Nikolaev and Partners Law Firm. Ivan is an expert in the field of civil and property law and real estate, and is experienced in commercial law and construction. He is an exceptional professional in the field of real estate survey. He has also worked in numerous insolvency and bankruptcy proceedings and has extensive in-house experience. Ivan is one of the few lawyers in Bulgaria that actively works on fintech and blockchain legal matters, both with clients and in his own capacity as a passionate man of law, trying to bend the existing legislation to serve industries that are far ahead of the current legal framework.

Ivan regularly writes articles that are published in specialised legal magazines and journals on topics related to construction, real estate, bankruptcy and cryptocurrencies.

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Danail Petrov is a finance and accounting professional with more than 12 years of experience in large multinational companies.

Danail has experience working with multinational companies in the areas of IT services, trading, FMCG, and large manufacturers. He has excellent expertise in the IFRS, EU VAT and taxation regimes, as well as full compliance with Bulgarian national accounting and taxation legislation. Danail has experience in project fund finance and accounting of NGO structures, start-ups and small and medium-size company finance planning.

In the realm of crypto, Danail has been actively interested since 2018 and has participated (as an investor) in various project listings. He believes that crypto and blockchain technology will have a tremendous impact with the upcoming Web3 trend and that Bulgaria is a place where such businesses can thrive.

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Tihomir Todorov is the acting General Counsel of a leading Bulgarian publicly listed corporation. As such, he has extensive experience in regulatory matters, company law, mergers and acquisitions, as well as real estate, construction law and civil litigation. He worked on the acquisition of a leading bank in an Eastern European country and the subsequent National Bank approval of the governing bodies' members.

Tihomir is interested in emerging blockchain and crypto law. His practical work on the matter includes advising leading crypto firm AQRU since the establishment of their business to present. Tihomir is enthusiastic in representing Bulgaria as a crypto-friendly country and an exceptional place for setting up crypto businesses.

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