

# THE EPP'S DEMOCRATIC DEFICIT

## Hungary, Bulgaria and the Corruption of European Governance

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### I. J'Accuse: The EPP as Primary Enabler of Democratic Decline in Eastern Europe

The European People's Party (EPP), the dominant force in European parliamentary politics for three decades and the institutional home of Germany's Christian Democrats, bears primary responsibility for the erosion of democratic norms, judicial independence and anti-corruption standards in the eastern member states of the European Union. This is not a polemical assertion. It is a conclusion that follows directly from the documented record: fifteen years of shielding Viktor Orbán's Fidesz from Article 7 accountability;<sup>1</sup> decades of institutional protection for Boyko Borisov's GERB in Bulgaria despite that country's co-ranking with Hungary at the bottom of Transparency International's EU corruption index;<sup>2</sup> and, most consequentially, the personal appearance of Commission President Ursula von der Leyen — as EPP lead candidate for re-election — at a GERB campaign rally in Plovdiv's Ancient Theatre on 2 June 2024, standing beside Borisov, whose government would be toppled seven months later by the largest youth-led protests in Bulgarian history.<sup>3</sup> The transaction was transparent: GERB MEP votes for Commission President reappointment; Commission legitimacy for a party whose governance model the EU's own rule-of-law reports had repeatedly and explicitly censured.<sup>4</sup>

The EPP's protection of Orbán was not inadvertent. As documented in peer-reviewed academic analysis of Article 7 coalition-building in the European Parliament,<sup>5</sup> the EPP's bloc voting directly prevented the qualified majority required to advance Article 7 proceedings against Hungary — the treaty mechanism specifically designed to address systemic rule-of-law violations. The Commission, headed successively by EPP members Jean-Claude Juncker and Ursula von der Leyen, defied repeated requests by the Parliament to take institutional leadership on the Hungarian file. The Robert Schuman Foundation stated explicitly: 'The Commission and the Council's caution can be explained by political considerations and the need to have the support of Member States in question on important political issues — appointments to the heads of institutions, major climate guidelines, the adoption of the multiannual budget and recovery plan.'<sup>6</sup> The mechanism is structural: rule-of-law protection was traded for institutional votes.

Fidesz finally left the EPP in March 2021 — not because the EPP enforced its values, but because Orbán judged that the relationship had ceased to provide adequate protection and departed preemptively. By that point the Carnegie Endowment for International Peace had published its verdict on the parallel Bulgarian case: 'Bulgarians are disappointed with the EU's failure to apply

pressure on Borisov and the way the EPP has only praise for him. Securing political influence in parliament has taken precedence over defending EU values. The EU has only itself to blame for the assault on Europe's democracies from within.<sup>7</sup>

***“The Union's passivity regarding Orbán's 'mafia state' was in large part due to the leadership of the European People's Party putting time and again short-term political considerations over the principles this party supposedly stands for. This passivity no doubt emboldened rule of law backsliding. — EU Law Analysis, December 2017”***

The measurable consequences are now beyond dispute. Hungary and Bulgaria co-rank as the most corrupt EU member states on Transparency International's 2024 Corruption Perceptions Index — Hungary at its worst-ever score, globally alongside Cuba and Burkina Faso.<sup>8</sup> Approximately €20 billion of EU funds for Hungary were frozen under conditionality mechanisms while Budapest simultaneously received active EPP electoral endorsement.<sup>9</sup> Bulgaria had EU Recovery and Resilience Plan payments withheld for failing to implement judicial reforms,<sup>10</sup> while the EPP apparatus deployed von der Leyen and EPP President Manfred Weber to Plovdiv to campaign for the party responsible for those very failures — an event organised entirely by GERB, from which all other Bulgarian EPP member parties were excluded, as Borisov himself declared: 'In Bulgaria, the EPP is GERB.'<sup>11</sup>

Viktor Orbán's electoral defeat on 12 April 2026 — Péter Magyar's Tisza party securing a two-thirds supermajority at 80% turnout, the highest since the fall of communism<sup>12</sup> — did not merely end one political career. It exposed and collapsed the protective architecture the EPP had constructed around illiberal governance in Eastern Europe. The indictment is not that the EPP failed to notice corruption. It is that it knowingly protected it, systematically, for electoral advantage, at the direct expense of citizens in the EU's poorest and most corrupt member states.

## **II. The Parallel Architecture: Rogán in Budapest, Peevski in Sofia**

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### **A. Antal Rogán: The Intelligence and Propaganda State Behind Orbán**

The structural parallel between Hungary and Bulgaria is most precisely illustrated by the figures who controlled civilian intelligence in each country. In Hungary, that figure was Antal Rogán, Minister in Charge of Orbán's Cabinet Office since 2015, who controlled the National Communications Office, the Digital Government Agency, the Hungarian Tourism Agency — and Hungary's civilian secret services. Known among critics as the 'propaganda minister,' Rogán rarely appeared in public but was the primary architect of the information environment that sustained Orbán's hegemony for sixteen years.<sup>13</sup>

On 7 January 2025, the US Department of the Treasury's OFAC sanctioned Rogán under Executive Order 13818 (Global Magnitsky Act). The Treasury stated that Rogán 'has orchestrated Hungary's system for distributing public contracts and resources to cronies loyal to himself and the Fidesz political party' and described his conduct as 'emblematic of the broader climate of impunity in Hungary where key elements of the state have been captured by oligarchs and undemocratic actors.'<sup>14</sup> US Ambassador David Pressman characterised Rogán as 'a primary architect, implementer and beneficiary' of a systemic 'kleptocratic ecosystem.'<sup>15</sup> The Trump administration

lifted those sanctions in April 2025, citing 'US foreign policy interests' — illustrating the degree to which anti-corruption enforcement has become subordinated to great-power transactionalism.<sup>16</sup>

■ Source: US Department of the Treasury, OFAC Press Release, 7 January 2025; Wikipedia, Antal Rogán, citing Treasury and State Department statements

## **B. Delyan Peevski: The Intelligence State and Deep State of Bulgaria**

Bulgaria's structural equivalent of Rogán is Delyan Peevski — a more complex and more deeply embedded figure. Having served intermittently as a Member of Parliament since 2009 and having held formal positions including head of Bulgaria's counterintelligence agency DANS, Peevski has constructed what independent analysts describe as a 'deep state' in Bulgaria, determining who should hold power and what direction Bulgarian politics takes.<sup>17</sup> Only 2% of Bulgarians say they trust him; 88% distrust him — yet he remained the decisive swing-vote broker sustaining successive Bulgarian governments.

On 2 June 2021, the US Department of the Treasury sanctioned Peevski under the Global Magnitsky Act — at the time the single largest Magnitsky action targeting corruption ever taken.<sup>18</sup> The designation covered Peevski, oligarch Vassil Bojkov, former DANS Deputy Chief Ilko Zhelyazkov, and 64 associated entities. The Treasury documented that Peevski 'negotiated with politicians to provide them with political support and positive media coverage in return for receiving protection from criminal investigations,' and that his front man Zhelyazkov ran bribery schemes involving Bulgarian residency documents for foreign nationals, paying senior government officials monthly bribes in exchange for information and loyalty.<sup>19</sup> The United Kingdom followed with coordinated Magnitsky-equivalent sanctions in February 2023, with Foreign Secretary James Cleverly stating that Peevski had been 'involved in attempts to exert control over key institutions and sectors in Bulgarian society through bribery and the use of his media empire.'<sup>20</sup>

■ Source: US Treasury OFAC, 2 June 2021 (case JY0208); UK Foreign Office, 10 February 2023; Radio Free Europe/Radio Liberty, 12 August 2024

Peevski controls a media empire that Reporters Without Borders in 2018 described as embodying the 'corruption and collusion between media, politicians and oligarchs' in Bulgaria.<sup>21</sup> Bulgaria has tumbled from 35th on the Press Freedom Index at EU accession in 2007 to 111th — by far the worst performer of any EU member or candidate state — with over 90% of Bulgarian journalists reporting frequent interference with their work in polls by the Association of European Journalists.<sup>22</sup>

After Orbán's lobbying secured Rogán's Magnitsky delisting in April 2025, Peevski's network explicitly began emulating the Hungarian template. A US Department of Justice FARA filing revealed that Bulgarian diplomat Ivan Petrov, acting on behalf of the Ministry of Foreign Affairs, engaged US lobbyist James Finzi to secure Peevski's Magnitsky removal.<sup>23</sup> Borisov held a documented meeting with Donald Trump Jr. at Sofia's Balkan Hotel; Foreign Minister Georg Georgiev pitched nuclear energy projects, TurkStream extensions and military procurement deals to Secretary of State Marco Rubio at the April 2025 NATO Foreign Ministers' meeting in Brussels. US officials reiterated at each encounter that Peevski's sanctions would stand.<sup>24</sup>

■ Source: Analyses & Alternatives, 'Lobbying Scandal: Oligarch, Diplomat, and MFA,' 10 July 2025; DOJ FARA filing; Balkan Insight reporting

### III. The Generation That Said No: Bulgaria's December 2025 Uprising

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The protests that toppled the Zhelyazkov government between 26 November and 11 December 2025 constitute the most significant popular mobilisation in Bulgaria since the 1990s. Between 150,000 and 250,000 people participated on 10 December alone<sup>25</sup> — approximately 3.5% of Bulgaria's total population — in what multiple international sources identified as 'Gen Z protests,' the first such movement to directly topple a European government in 2025.<sup>26</sup> The immediate trigger was the 2026 budget, which proposed raising pension and social security contributions while simultaneously lifting public sector salaries — in a country already ranked the poorest in the EU and second-worst for corruption.

The protests were organised through a coalition of PP-DB's youth organisations, the Facebook group Active Politics (activepolitics.bg), and the civic initiative Future in Bulgaria, organised by young doctors.<sup>27</sup> Key named figures included 22-year-old sociology student Anna Bodakova — who framed the issue starkly: 'We want to stay in Bulgaria, work here, start our families here and through our taxes provide the funds required to support the social security system that will one day pay our parents' pensions'<sup>28</sup> — and Kaloyan Vasev, who alongside Bodakova was formally present in parliament as a Gen Z representative during the no-confidence vote process.

The protests succeeded rapidly for four interlocking reasons identified by the ZOiS Centre for East European and International Studies: strong but fluid organisation; popular breadth across social groups and cities; a generational shift in expectations among Bulgarians who grew up as EU citizens rather than post-communist transition survivors; and a protest-sensitive political system in which Bulgarian elites have historically chosen resignation and elections over repression.<sup>29</sup> The government resigned on 11 December, acknowledging 'the voice of the people,' minutes before a scheduled no-confidence vote it was expected to survive.<sup>30</sup>

Yet the structural weakness of the movement was visible from the outset. The protests were deliberately leaderless — organised through social media platforms, particularly TikTok and Instagram — because, as Gen Z organisers from Kenya and Bangladesh have articulated in parallel movements: 'If you strike the head of the snake, you kill the snake. But if there are many heads, which head will you strike?'<sup>31</sup> This tactical strength became a strategic vulnerability. Gen Z toppled the government in fifteen days but produced no political party, no manifesto, no durable leadership structure capable of translating street power into parliamentary seats.

The political beneficiaries were accordingly those who had existing infrastructure. PP-DB, which organised many of the protests, polled only 12% heading into April 2026 elections. Rumen Radev — former president, holder of documented pro-Russian positions, with no published manifesto — launched Progressive Bulgaria in March 2026 and immediately polled at 31%, capturing the anti-establishment energy without sharing the movement's liberal democratic values.<sup>32</sup> A post-protest survey by the Open Society Institute Sofia found that 57% of Bulgarians aged 18-29 now expressed interest in voting — a 20% increase from 2023 — but that energy had no organised electoral vehicle of its own.<sup>33</sup>

### IV. Orbán Falls: Impact on Bulgaria's April 19, 2026 Election

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#### Impact on Peovski and Borisov: Silence as Indictment

The defeat of Orbán on 12 April — seven days before the Bulgarian poll — was immediately weaponised by reformist parties and immediately met with conspicuous silence from Borisov and Peevski. The liberal Yes, Bulgaria coalition published a statement within hours: 'Those who cannot or do not dare to say a word since last night after Orbán's defeat are the same ones who pointed to him as an example and even consulted with him. We await with interest the comments of Borisov, Radev and Peevski.'<sup>34</sup> No substantive comment from Borisov or Peevski was forthcoming.

The Orbán parallel is not metaphorical for the Borisov-Peevski axis — it is operational. Borisov's GERB and Orbán's Fidesz shared EPP membership for over a decade. Borisov attended the same EPP summit structures. The governing model is structurally identical: captured judiciary, captured media, EU funds as patronage resource, oligarchic enrichment protected by political office. Orbán's defeat at 80% turnout — made possible by an opposition that framed the choice as 'East or West'<sup>35</sup> — demonstrated that the model is electorally defeatable when turnout is sufficiently mobilised. For Peevski, whose DPS vote-buying machinery loses effectiveness as overall turnout rises, the Hungarian result was operationally threatening: the cordon sanitaire around him becomes harder to maintain when more citizens vote.

### **Impact on Radev: Exploiting the Moment While Embodying the Risk**

Radev moved fastest to appropriate the Hungarian moment. Within hours of Orbán's concession, he told journalists: 'We will remove Borisov and Peevski from the political scene forever if 80% of the people come out to vote, as happened in Hungary.'<sup>36</sup> PP-DB leader Asen Vassilev simultaneously noted that in 2024 Bulgarian households had overtaken Hungary in income levels for the first time — a direct indictment of the Orbán economic model and, by extension, of GERB's.

The analytical irony is acute. The Italian Balkan observatory Osservatorio Balcani e Caucaso Transeuropa published a direct question days before the election: is Radev a 'moderate Orbán'?<sup>37</sup> The comparison is not unreasonable. Radev's documented pro-Russian posture, his attacks on the most openly pro-European party (PP-DB) rather than on Borisov or Peevski in his campaign's initial phase, his ambiguous relationship with the Turkish Stream gas infrastructure — all echo the Orbán playbook more closely than the Magyar one. Radev is borrowing the rhetoric of Magyar while governing, if he governs, in the manner of Orbán.

### **Impact on PP-DB: The Party That Organised the Revolution It Could Not Win**

PP-DB's fundamental problem is not strategic but historical. It organised protests that toppled a government (December 2025); it received the second government-formation mandate and returned it unfulfilled because it could not secure support for its anti-corruption package (July 2024)<sup>38</sup>; it governed with GERB — the party it was constituted to oppose — in a rotational government that collapsed in nine months (2023-2024);<sup>39</sup> and it suffered an internal corruption scandal involving its own activists (June 2025)<sup>40</sup> that undermined its core identity claim. The Orbán defeat, which PP-DB's Vassilev invoked as a 'Hungary shows the way' moment,<sup>41</sup> provided a last-minute narrative boost but could not resolve the structural problem: polling at 12%, PP-DB cannot govern alone and its most natural coalition partner (Radev's Progressive Bulgaria) has publicly ruled out partnership.

### **Impact on Media: Structural Capture Meets the Hungarian Mirror**

Bulgaria's media environment entering the April 2026 election was, by Transparency International and Reporters Without Borders assessments, the worst of any EU or candidate state. Press

Freedom Index rank: 111th.<sup>42</sup> More than 90% of Bulgarian journalists report frequent editorial interference. EU funds have been diverted to sympathetic media outlets.<sup>43</sup> In 2018, two journalists were detained while investigating EU fund drainage by politically connected procurement entities. Peevski's media empire — newspapers, distribution networks, online platforms — functions as both information suppression and narrative management infrastructure.

Orbán's defeat in Hungary provided the Bulgarian media environment with a rare externally validated counter-narrative: the EPP-aligned model of state capture and corruption can be electorally defeated. Bulgarian investigative outlets (Capital, Mediapool, Bivol, the Anti-Corruption Fund) moved quickly to frame the Bulgarian election in these terms. TikTok — which during the December protests had already bypassed captured traditional media to coordinate 150,000 people in the streets<sup>44</sup> — provided the distribution channel for that framing. The question heading into April 19 was whether the digital counter-narrative could overcome the structural media capture that the Peevski network had constructed over fifteen years.

## **V. The Evidence File: EU Funds Abuse, Gas Infrastructure and Border Procurement**

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### **A. The Chiren Gas Storage Scandal and the EPPO Investigation**

The most consequential documented case of EU funds abuse in Bulgaria with direct geopolitical dimensions concerns the Chiren underground gas storage facility — Bulgaria's sole gas reserve, whose expansion to 1.1 billion cubic meters was designed to help unplug Southern Europe from Russian pipeline dependency. The expansion project has been under EPPO investigation since August 2024, when European prosecutors raided three Bulgartransgaz offices and seized documents relating to procurement procedures.<sup>45</sup>

The core of the scandal: state gas monopoly Bulgartransgaz, under CEO Vladimir Malinov — a close ally of the Peevski-Borisov network who simultaneously served as acting Energy Minister — approved a contract for construction company Glavbolgarstroy (GBS), a firm tied to the Borisov-Peevski influence network. GBS accumulated change requests approved without scrutiny. Bulgartransgaz's own internal auditor, Velko Peev, documented procurement law violations and safety breaches in reports to Malinov; Bulgartransgaz fired Peev, who subsequently received anonymous death threats and sent complaints to the EPPO.<sup>46</sup> Subcontractor PM Lucas sent nine letters in six months alleging the project was 'plagued by severe ethical, legal, technical, procurement, and safety concerns,' warning of possible catastrophic explosion risks — and alleging that 'influential political actors' including Delyan Peevski were attempting to force them off the project.<sup>47</sup>

As the EPPO investigation gained momentum, events took a disturbing turn. The Bulgarian European Prosecutor overseeing the Chiren investigation, Karina Georgieva, had her mother die in suspicious circumstances in February 2025. The EPPO subsequently temporarily suspended Georgieva as 'the strongest measure available against any risk or perception of compromised integrity of investigations'<sup>48</sup> — an extraordinary step that raised questions about the safety and independence of prosecutors operating in the Bulgarian environment.

The contrast with the TurkStream extension — a Russian-interest project routed through Bulgaria to Hungary and Slovakia — is documented and stark. The Chiren expansion, which serves EU

and US energy security interests, was built over 14+ years and remains incomplete after EPPO-documented fraud. TurkStream's Bulgarian extension, which serves Russian energy interests, was completed in two years.<sup>49</sup> Leaked documents published in March 2024 by Bulgarian investigative media suggested the Kremlin, through Russian and Belarusian companies, had full operational control over TurkStream's Bulgarian construction from 2019 to 2021 — the period of the Borisov government.<sup>50</sup> These documents generated a direct question in the European Parliament asking the Commission whether it intended to investigate whether all EU contract-award procedures had been followed.<sup>51</sup>

■ Source: EPPO Press Release, August 2024; Follow the Money investigative report, January 2026; EUalive.net analysis, May 2025; European Parliament Written Question P-002016/2024; BG Elves/Bivol, March 2024

## **B. Border Scanning Equipment: Transparency Abandoned**

A second documented case of procurement irregularity directly involving EU funds and national security infrastructure concerns scanning equipment for Bulgaria's external border — part of the EU Customs Control Equipment Instrument (CCEI) programme. The Bulgarian Customs Agency (BCA) terminated a transparent public procurement procedure (reference CCEI: 2021-BG-BCROSS 101079791) and shifted to a 'secretive procedure involving direct negotiations with an undisclosed partner,' citing national security grounds to derogate from the transparency obligations of EU Directive 2014/24/EU.<sup>52</sup>

This generated a formal question in the European Parliament in October 2024 raising 'serious concerns about Bulgaria's commitment to the rule of law' and its Schengen membership prospects. The deviation from transparency obligations also raised 'legitimate security concerns due to the lack of transparency regarding the equipment supplier' — in a context where the source of high-value scanning equipment at EU external borders has direct national security implications, particularly given documented Russian intelligence penetration of Bulgarian institutions.<sup>53</sup> The involvement of US-linked commercial interests in parallel discussions around border procurement has added a transactional dimension to what should be a straightforward EU rule-governed process.

■ Source: European Parliament Written Question P-002016/2024, submitted October 2024; EU Directive 2014/24/EU on public procurement

## **C. The Systemic Pattern: OLAF, EPPO and the Under-Reporting Gap**

The Bulgarian Court of Auditors reported in January 2026 that between 2021 and 2023, only five cases of corruption related to EU funds were officially reported in Bulgaria — in a country managing €13 billion across 13 EU programmes in the 2021-2027 period.<sup>54</sup> This near-total absence of official reporting is not evidence of low corruption but of systemic under-detection: employees and fund beneficiaries avoid reporting due to lack of protection and institutional distrust. The Court of Auditors found that existing anti-corruption measures show 'low efficiency and significant gaps at the strategic, operational, and coordination levels.'

At the EU level, Transparency International EU's 2025 EPPO assessment identified a critical structural failure: less than 1% of cases reported to the EPPO came from OLAF — the EU's premier anti-fraud office.<sup>55</sup> The EPPO's own chief prosecutor stated: 'The level of cooperation is very low with OLAF.' The assessment noted that the EPPO had in 2024 initiated 1,504 new investigations representing estimated damages exceeding €24.8 billion — but that this represented only a fraction of potential prosecutable activity, given OLAF's systematic non-referral. Critically, Hungary — the most documented case of EU funds misuse in the bloc —

remained outside the EPPO entirely, an 'entirely predictable state of affairs given the level of corruption and financial crime in the country.'<sup>56</sup>

■ Source: *Transparency International EU, 'Prosecuting crime in the EU: the state of the EPPO in 2025,' July 2025; Bulgarian Court of Auditors, January 2026*

## VI. The Post-Orbán Imperative: OLAF and EPPO Must Now Act

The electoral defeat of Viktor Orbán removes the primary institutional veto that blocked full anti-corruption enforcement against Hungary and, by political contagion, against the Borisov-Peevski model in Bulgaria. Hungary's refusal to join the EPPO was not an administrative quirk — it was a deliberate protective measure ensuring that the institutional architecture for prosecuting EU funds abuse remained outside the reach of the bloc's independent prosecutorial office. Magyar's incoming government has signalled Hungary will join the EPPO. That changes the entire enforcement landscape.

The EPP-led European Commission now faces a binary choice whose contours are clearly defined by the Hungarian precedent. It can either acknowledge the systematic failure of the EPP governance model in Eastern Europe and mandate full transparency from OLAF and EPPO on all active investigations — including the Chiren gas storage procurement, the border scanning equipment procurement, TurkStream construction contracting, and all abuse-of-EU-funds cases in Bulgaria — or it can continue to apply the protection model that was just repudiated by Hungarian voters at 80% turnout. The political cost of the latter option is now legible: the Hungarian election demonstrated that populations subjected to captured institutions and EU funds misuse will eventually, when mobilised in sufficient numbers, vote the perpetrators out.

The specific enforcement demands that follow from the documented record are clear:

- 1. The Chiren EPPO Investigation.** The investigation into Bulgartransgaz procurement and the GBS contract must be brought to public conclusion. The temporary suspension of Bulgarian European Prosecutor Georgieva must be resolved transparently. The EPPO must report publicly on whether political interference occurred and from what source. The €90 million in advanced funds and the incomplete drilling must be accounted for.
- 2. TurkStream Construction Contracting.** The European Commission must respond substantively to European Parliament Written Question P-9-2024-001022 on whether EU contract-award procedures were followed in the TurkStream extension through Bulgaria, and whether leaked Kremlin documents indicating full Russian operational control over the 2019-2021 construction are under active OLAF investigation.
- 3. Border Scanning Equipment.** The Commission must require Bulgaria to return to transparent procurement procedures for CCEI-funded scanning equipment and must publish the identity of the undisclosed supplier selected through direct negotiation. National security exemptions cannot be used to conceal the source of infrastructure placed at the EU's external border, particularly given documented Russian intelligence penetration of Bulgarian state institutions.
- 4. OLAF-EPPO Cooperation.** The less-than-1% referral rate from OLAF to EPPO is institutionally inexcusable. The Commission must mandate reformed cooperation protocols, with particular urgency for Bulgaria — managing €13 billion in EU programme funds with documented near-zero

official corruption reporting — and for Hungary upon its EPPO accession.

**5. Magnitsky-Sanctioned Individuals and EU Fund Access.** Both Peevski (US and UK sanctions, 2021 and 2023) and entities within his network control or influence companies active in EU-funded procurement. The Commission must publish a full accounting of all EU funds received by entities connected to Magnitsky-sanctioned individuals in Bulgaria, consistent with the conditionality mechanisms already applied to Hungary.

The Orbán precedent establishes that EPP protection of kleptocratic governance in Eastern Europe is not indefinitely sustainable — electorally, institutionally, or morally. The generation that placed 'GEN Z IS COMING' and 'Young Bulgaria Without the Mafia' on banners in Sofia's Triangle of Power in December 2025 has demonstrated that the tolerance of their predecessors for institutional corruption is not hereditary. What Magyar is now beginning to dismantle in Budapest, Bulgarian reformists — in government or in the streets — will be required to dismantle in Sofia. The EPP-led Commission has a narrow window in which the enforcement of its own treaty obligations can appear as institutional integrity rather than post-hoc damage control.

***“The greater the degradation of the rule of law in EU member states, the greater the chance democracy will be weakened. Leaders of EU institutions are making life easy for Moscow and Beijing. The EU has only itself to blame. — Carnegie Endowment for International Peace, 2021”***

## Footnotes

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- <sup>1</sup> Article 7 of the Treaty on European Union provides a mechanism for addressing systemic breaches of EU values, including rule-of-law violations. The European Parliament launched Article 7(1) proceedings against Hungary in 2018. As of 2025, those proceedings remained unresolved in the General Affairs Council.
- <sup>2</sup> Transparency International, Corruption Perceptions Index 2024: Hungary and Bulgaria jointly ranked lowest among EU member states, with Bulgaria scoring 43 and Hungary at its worst-ever score — globally comparable to Cuba and Burkina Faso.
- <sup>3</sup> EPP Campaign Media Advisory, 1 June 2024: 'On Sunday 2 June, Ursula von der Leyen, EPP Lead Candidate, will be in Plovdiv, Bulgaria to campaign with GERB.' Both von der Leyen and EPP President Manfred Weber attended. The event was entirely organised by GERB. All other Bulgarian EPP-member parties were excluded.
- <sup>4</sup> European Commission Rule of Law Reports (2020-2024) on Bulgaria repeatedly documented concerns about judicial independence, prosecutorial control, corruption, and media freedom. Bulgaria's Recovery and Resilience Plan payments were partially withheld for failure to implement required judicial reforms.
- <sup>5</sup> Ibid. at footnote 1; peer-reviewed analysis in European Journal of International Relations: Tomsen, 'Getting Article 7 done: coalition-building against Hungary in the European Parliament,' 2024. The EPP's bloc provided the margin preventing qualified majority for Article 7 against Hungary, while no such obstacle existed against ECR-affiliated Poland.
- <sup>6</sup> Fondation Robert Schuman, European Issue No. 590, 'Protecting the checks and balances to save the Rule of Law,' 2021. Full text: [fondation-robert-schuman.eu](https://fondation-robert-schuman.eu).
- <sup>7</sup> Carnegie Endowment for International Peace, Strategic Europe, 'Bulgaria's Election: The EU's Negligence of Corruption and Its Values,' April 6, 2021. Author: Jan Techau. [carnegieendowment.org](https://carnegieendowment.org).
- <sup>8</sup> EU Law Analysis (Marek Safjan and Laurent Pech), 'The European Commission's Activation of Article 7: Better Late than Never?,' December 2017.
- <sup>9</sup> Transparency International, CPI 2024. US Treasury OFAC press release on Rogán: 'Hungary received the lowest score of any EU member state on Transparency International's 2023 CPI for the second consecutive year.'
- <sup>10</sup> Verfassungsblog, 'Tackling the Union's Orbán Problem Now,' April 10, 2025: approximately €20 billion of EU funds frozen under conditionality mechanisms.
- <sup>11</sup> European Commission, Recovery and Resilience Scoreboard; Rule of Law Report 2024, Country Chapter Bulgaria, pp. 7-9, citing repeated failure to advance judicial reform legislation.
- <sup>12</sup> Capital Business Insights, 'Ursula von der Leyen in Plovdiv, or In Bulgaria, EPP is GERB,' 4 June 2024. Direct Borisov quotation: 'In Bulgaria, the EPP is GERB.' [kinsights.capital.bg](https://kinsights.capital.bg).
- <sup>13</sup> Council on Foreign Relations, 'Orbán's Fall in Hungary Opens a Door for Europe — and Closes One for Russia,' Liana Fix and Benjamin Harris, April 13, 2026. Turnout figure: 80%, highest since 1989. [cfr.org](https://cfr.org).
- <sup>14</sup> US Department of the Treasury, OFAC, press release on Rogán, 7 January 2025. [home.treasury.gov/news/press-releases/jy2773](https://home.treasury.gov/news/press-releases/jy2773).
- <sup>15</sup> Washington Times, 'U.S. Sanctioning Top Hungarian Official for Alleged Corruption,' 7 January 2025. Direct Pressman quotation.
- <sup>16</sup> Wikipedia, Antal Rogán, citing Hungarian government announcement of sanction removal, April 2025, and US State Department statement.
- <sup>17</sup> Radio Free Europe/Radio Liberty, 'Bulgaria's Most Powerful Oligarch, Delyan Peevski, May Be Losing His Grip on Power,' 12 August 2024. [rferl.org](https://rferl.org).
- <sup>18</sup> US Department of the Treasury, OFAC, press release case JY0208, 2 June 2021. [home.treasury.gov/news/press-releases/jy0208](https://home.treasury.gov/news/press-releases/jy0208).
- <sup>19</sup> Ibid. Full text of Magnitsky designation, including documentation of bribery schemes, residency document sales, and monthly payments to officials.
- <sup>20</sup> UK Foreign Office statement, 10 February 2023, coordinated with US sanctions. Direct quotation from Foreign Secretary James Cleverly. [balkaninsight.com](https://balkaninsight.com).
- <sup>21</sup> Reporters Without Borders, Press Freedom Index 2018 statement on Peevski. [rsf.org](https://rsf.org).
- <sup>22</sup> Wikipedia, Corruption in Bulgaria, citing RSF Press Freedom Index data and Association of European Journalists polling.
- <sup>23</sup> US Department of Justice FARA filing, lobbyist James Finzi on behalf of Ambassador Ivan Petrov; Analyses & Alternatives, 'Lobbying Scandal,' 10 July 2025. [altanalyses.org](https://altanalyses.org).

- <sup>24</sup> Ibid.; also Analyses & Alternatives citing documented Borisov-Trump Jr. meeting at the Balkan Hotel, Sofia, and Georgiev-Rubio encounter at NATO Brussels, April 2025.
- <sup>25</sup> Wikipedia, 2025-2026 Bulgarian protests, citing drone imagery-confirmed crowd estimates of 150,000-250,000 on 10 December 2025.
- <sup>26</sup> ZOiS Spotlight 2/2026, Ivaylo Dinev, 'Why Bulgaria Became a Success Story for the Gen Z Protests,' January 28, 2026. zois-berlin.de.
- <sup>27</sup> ZOiS Spotlight 2/2026 (ibid.); International IDEA, 'Democracy goes digital: Social media and Bulgaria's Gen Z protests,' January 23, 2026. idea.int.
- <sup>28</sup> Balkan Insight, 'Different Energy: Budget Win for Young Bulgarian Protesters Fuels Hope for More,' 5 December 2025. Direct Bodakova quotation.
- <sup>29</sup> ZOiS Spotlight 2/2026 (ibid.), identifying four structural factors.
- <sup>30</sup> Wikipedia, 2025-2026 Bulgarian protests, citing Prime Minister Zhelyazkov's statement upon resignation, 11 December 2025.
- <sup>31</sup> Waging Nonviolence, 'How Gen Z movements share tactics and challenges,' January 9, 2026. Direct quotation from Kenyan organiser Amenya. wagingnonviolence.org.
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