

Deep-dive analysis Appendix

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1 Bulgaria's Schengen Bid

Bulgaria's pursuit of Schengen Area membership was hindered by persistent concerns, some of which emphasized the corruption in the country and the unstable rule of law. Despite efforts to address these issues, Bulgaria continued to face obstacles in its path towards Schengen accession. This ongoing struggle not only impeded its integration into the Schengen Area but also reflected broader problems of governance and transparency that the country continued to grapple with on its journey towards European integration (BNR). On 30 December 2023, the European Council reached a unanimous decision to eliminate air and maritime internal border controls for Bulgaria as of 31 March 2024, which marked a partial integration into the Schengen Area (Investor).

1.1 Deep-dive analysis of the online content

601 55 50k 40 Number of Articles 30 27 201 17 030 15 368 11 058 10k 9 5 3 8 **`14**8 8 5 1 8 7 73 787 3 399 193 2 169 2 069 2 060 1 346 1 1 97 1 0 3 5 366 1 2 1 7 0 lan '23 Feb '23 lun '23 lul '23 Aug '23 Sep '23 Oct '23 Nov '23 lan '24 Feb '24 Mar '23 Apr '23 May '23 Dec '23 Content Published Time Media aggregators itimate online media oom websites

1.1.1 Overview of the narrative coverage segmented by source types

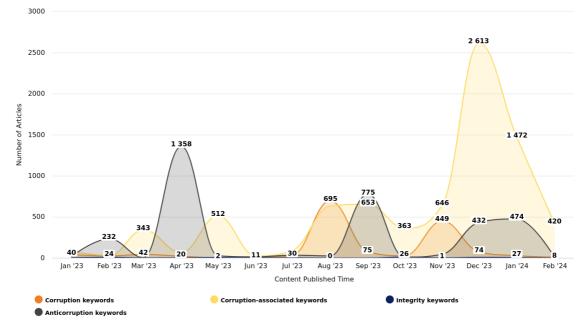
 Table 1:
 The chart represents the narrative's monthly volume distribution divided according to the three source types:
 legitimate online media, mushroom websites and media aggregators.

The coverage of Bulgaria's Schengen bid across the different media types shows a consistent pattern, with mushroom websites leading in the number of articles, followed by legitimate online media and media aggregators.

There was a noticeable surge in coverage from mushroom websites in December 2023, suggesting increased interest that prompted extensive reporting, although the credibility of this information may be questionable. Mushroom websites emphasized then Prime Minister Nikolay Denkov's remarks on Bulgaria's partial Schengen entry. One widely circulated statement, presented in an attention-grabbing and sarcastic title, was Denkov's welcome of the removal of the Dutch veto and his emphasis on Hungary's role. He also condemned the National Assembly's bank blockade and highlighted the use of proper diplomatic channels (<u>Perfekt</u>).

Legitimate media maintained a steady interest over the monitored months, peaking moderately in response to key developments, especially in December 2024 when Bulgaria was allowed to join the Schengen Area via air and sea routes starting March 2024 (<u>BTA</u>).

Media aggregators mirrored this trend but without publishing as much, which points to their role in redistributing existing stories, while sometimes also disseminating misleading information (<u>The Sofia Times</u>).



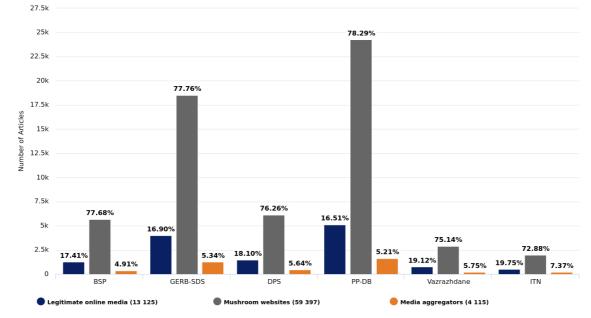
1.1.2 Overview of the four keyword sets

Table 2: The chart illustrates the narrative's overall volume distribution per month and per keyword set.

There was a pronounced anticorruption keywords spike in April 2023, aligning with former Foreign Minister Nikolay Milkov's emphasis on anticorruption measures in the context of Bulgaria's potential accession to Schengen, necessitating the Parliament to pass two laws on Chief Prosecutor accountability and anticorruption body reform within a specified deadline (<u>Dnes News</u>).

In contrast, the corruption-associated keywords surged in December 2023, highlighting the EU Commissioner for Home Affairs Ylva Johansson's statement about the successful assessment of Bulgaria's readiness to join the Schengen Area (<u>Fakti</u>).

Despite its overall limited mentions, some pieces of content used the word "integrity" to refer to the reliability and trustworthiness of border guards, who ensure the adherence to the existing regulations for effective border control and security (<u>News.bg</u>).



1.1.3 Overview of political parties mentions per source type

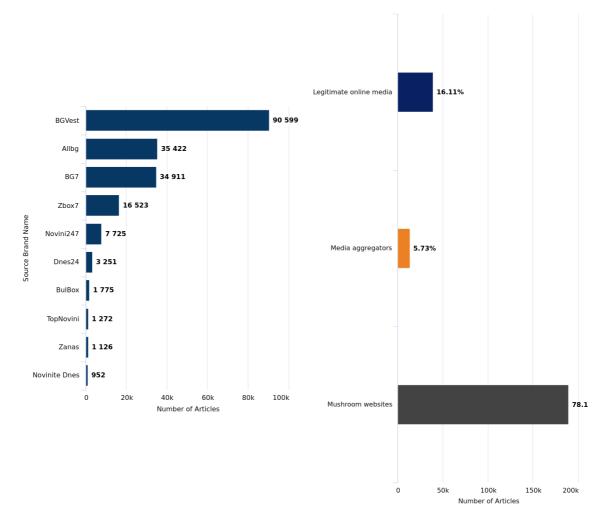
 Table 3:
 The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

PP-DB leads in mentions across all media outlets, especially mushroom websites, as many articles highlighted the statement of its deputy Bozhidar Bozhankov regarding the significance of Bulgaria's accession to the Schengen Area and the Eurozone and the potential economic benefits. He also underscored the need for additional reforms so that the country could meet the entry criteria (<u>Trafficnews</u>).

GERB-SDS was widely mentioned as well. Various sources exposed the discussion between the political factions concerning Bulgaria's potential Schengen entry, with GERB-SDS and PP-DB negotiating in Parliament (<u>BNR</u>).

It should be noted that mushroom websites emphasized BSP leader Kornelia Ninova's accusations regarding Bulgaria's accession to Schengen. She condemned the government's agreement to accept an unlimited number of asylum seekers, labeling it as treason and a violation of national principles (<u>Novifakti</u>). The same media outlets also paid attention to ITN's response, which aligned with Kornelia Ninova's concerns regarding troubling data about incoming refugees.

DPS (<u>Chaspic</u>) and Vazrazhdane (<u>Novini247</u>) demonstrated similar trends, with a moderate number of articles, suggesting varied content that reflects diverse perspectives on Bulgaria's challenges in joining the Schengen Area.



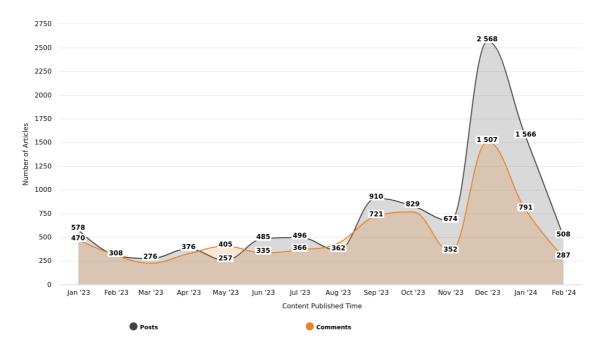
1.1.4 Overview of the top online sources and source type distribution

Table 4: The charts display the top 10 sources that commented on the narrative and the volume distribution per source type: legitimate online media, mushroom websites and media aggregators.

The volume distribution of the content about Bulgaria's bid to enter the Schengen Area was heavily dominated by mushroom websites, with BGVest leading by a considerable margin. This intense focus from less credible outlets suggests potential narrative manipulation attempts.

Although with a limited presence, aggregators like Novini247, BulBox and Novinite Dnes still managed to play a part in the overall news dissemination.

Notably absent from the top sources in the chart are the legitimate news outlets, which suggests that the coverage of this narrative was primarily driven by less traditional media sources, where the quantity does not necessarily equate to quality or reliability.



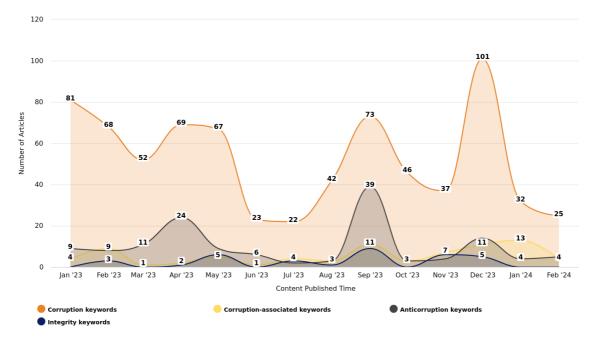
1.2 Deep-dive analysis of Facebook coverage

1.2.1 Overview of volume distribution of original posts and comments

The volume distribution chart, segmented by comments and posts, indicates a significant peak in December, particularly in original posts. What is more, the number of posts surpassed that of the comments throughout the year. However, the latter were still quite consistent, which reflects the users' constant engagement with the narrative.

The sharp increase in both posts and comments at the year's end correlates with Bulgaria's announced inclusion in the Schengen Area for air and sea travel starting March 2024. Notably, some comments expressed discontent, suggesting that the entry may result in the return of refugees. A number of these comments even repeatedly voiced the concern, with identical critical messages posted by the same user under posts about the news.

Table 5:
 The chart represents the narrative's monthly volume distribution divided by type of activity: posts and comments.



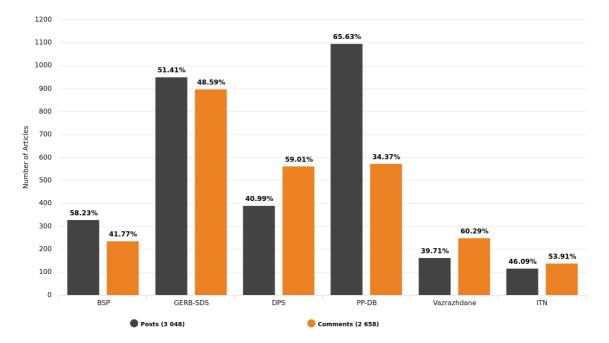
1.2.2 Overview of the four keyword sets

Table 6: The chart represents the narrative's monthly volume distribution per keyword set.

The mentions of corruption and corruption-associated keywords demonstrate consistent, though not overwhelming, engagement, indicating an ongoing dialogue about these issues. In December, there was an increase in the users' interest in corruption, particularly evident from Facebook comments accusing GERB's leader Boyko Borisov of being a communist and holding him responsible for Bulgaria's unfavorable position within the EU. The posts accused him of engaging in corruption, facilitating illegal activities and ultimately hindering Bulgaria's accession to the Schengen Area.

The notable spikes in anticorruption keywords revolved around several posts that highlight DB's focus on Schengen accession, while also emphasizing GERB's resistance to an anticorruption legislation, which, according to the users, is the main obstacle.

The number of "integrity" mentions was comparatively low, even though many Facebook comments questioned the integrity of PP, focusing on issues such as corruption and mismanagement, with calls for the party's resignation.



1.2.3 Social coverage of the political parties

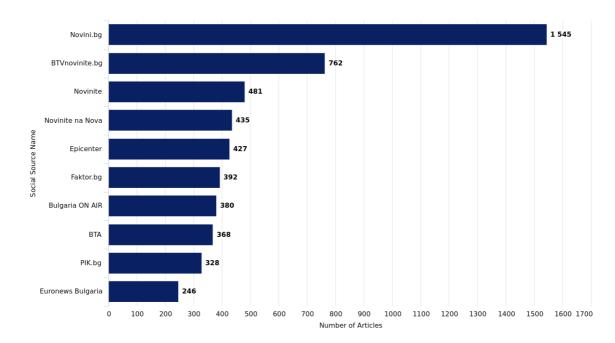
Table 7: The chart illustrates the Facebook engagement with the narrative, broken down by political parties and type of activity: posts and comments.

PP-DB, known for its commitment to the Schengen process, garnered significant mentions, reflecting its proactive role in the process through a large number of original posts and comments in regard to the acceptance of necessary laws for the Eurozone, Schengen and the Recovery and Sustainability Plan.

GERB-SDS also recorded robust activity with a slightly lower number of comments, often repeated across the different posts. It is worth noting that one of the most repeated comments targeted Boyko Borisov and accused him of being a communist but also of "burying Bulgaria at the bottom of the EU." On the other hand, original posts mainly republished news articles, with "Members of the European Parliament GERB/EPP – Bulgaria" official page being the primary source of content.

In contrast, BSP attracted lower engagement, with posts and comments mostly originating from the party's official Facebook page as well as the page of the party's leader Kornelia Ninova. Various comments frequently mentioned BSP as a secondary topic while discussing general political matters.

The comment references to DPS stood out, outnumbering those in posts, with many of them being repetitive and reposted by several users. One such comment underscored a potential cabinet formation between PP and DPS, which could, according to the author, emphasize Bulgaria's Schengen and Eurozone aspirations. The lower number of Vazrazhdane and ITN mentions indicates their more limited role in this narrative, as both parties were mentioned in passing alongside other political formations.



1.2.4 Top 10 social authors

 Table 8:
 The chart displays the top 10 social authors who posted on or received comments related to the narrative during the monitored period.

News outlet pages, notably led by Novini.bg, spearheaded the discussions by a significant margin. Moreover, by republishing news items that attract substantial engagement, particularly in terms of comments, the page underscored the prevalent discontent among users towards Bulgaria's corruption issues.

The legitimate media outlet BTVnovinite's official page ranked second, with comments constituting the predominant part of the engagements with it. Furthermore, these comments exhibited a similar pattern to those observed on Novini.bg's page, indicating a parallel engagement with the subject matter.

The sensationalist legitimate media outlet PIK's page demonstrated a clear bias against the political party PP, evident not only in its original content but also in the user comments below its posts. The sentiment was similarly extended towards the party GERB.

2 Lukoil case

In Bulgaria, the issue of Lukoil's derogation has been a focal point of heated political and public debate. Derogation, in this context, refers to the exemptions granted to Lukoil, allowing the company to operate under certain conditions not applied to its competitors (Politico). Throughout 2023, discussions intensified as parliamentary groups clashed over whether to maintain, amend or revoke these privileges amid concerns over national energy security and economic implications. The GERB-SDS party's push to remove them highlighted the complexities of Bulgaria's reliance on Russian oil and the intricate dynamics within its energy sector (NOVA). The debate peaked when the Parliament decided to continue Lukoil's exemption until October 2024, a controversial move that mirrored the nation's struggle to balance economic interests with political and public pressure (BTA). The situation reflects broader geopolitical tensions against Russia while ensuring its own energy needs are met.

2.1 Deep-dive analysis of the online content

2.1.1 Overview of the narrative coverage segmented by source types

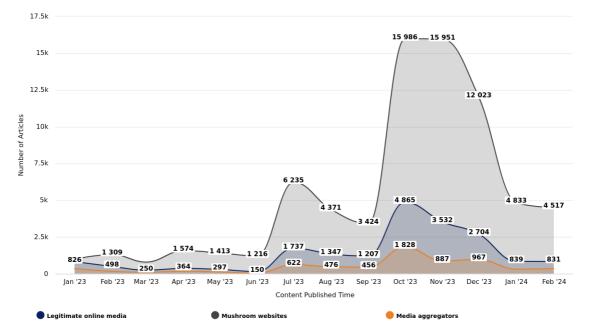
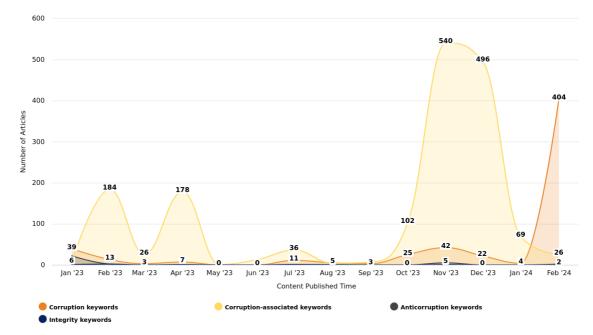


 Table 9:
 The chart represents the narrative's monthly volume distribution divided according to the three source types:
 legitimate online media, mushroom websites and media aggregators.

The volume distribution over time for articles on Bulgaria's Lukoil case showcases that mushroom websites increased their output during specific months, overshadowing legitimate online outlets and media aggregators.

October 2023 witnessed a significant peak across all source types, but it was mushroom websites that dominated the conversation with the highest number of articles, in response to Lukoil's decision to pay its taxes to the country (<u>BTVnovinite</u>). Another substantial peak, again in all kinds of media, was noted in July 2023 when the MPs voted for the termination of Lukoil's concession at the Rosenets oil port (<u>Blitz</u>).

Overall, the Lukoil case garnered attention across all media outlets, with notable peaks in coverage occurring at different times. This demonstrates Bulgarian media's widespread interest in the narrative.



2.1.2 Overview of the four keyword sets

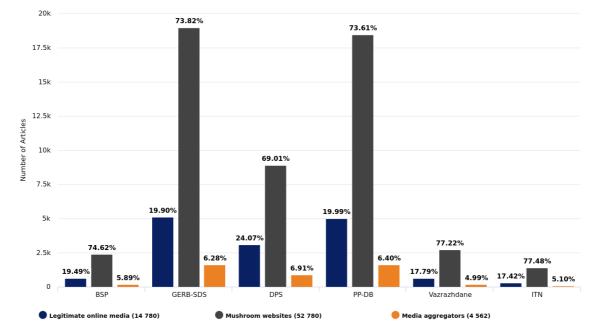
Table 10: The chart illustrates the narrative's overall volume distribution per month and per keyword set.

The corruption-associated keywords saw pronounced peaks in November and December 2023. These aligned with two events: the notification to prosecutors by DPS MP Delyan Peevski and GERB-SDS MP Delyan Dobrev about the illegal export of Russian oil by Lukoil Bulgaria (NOVA) and the former Minister of Economy and Industry Bogdan Bogdanov's statement about the ongoing investigations into the payments for Russian oil, which emphasized the challenges of transfer pricing in vertically integrated companies like Lukoil (24chasa).

The spike in corruption keywords in February 2024 coincided with then Prime Minister Denkov's BBC interview addressing various issues, including suspicions about Lukoil-Neftohim's activities and Russia's potential sanction evasion (<u>OFFNews</u>).

An interesting trend is the media's preference for corruption-associated keywords over direct references to corruption, with the former being used three times more frequently. This indicates a strategic focus on specific allegations and incidents rather than the broader concept of corruption.

The numbers for anticorruption and integrity keywords remained much lower throughout the period, which reflects a lesser focus on proactive and positive measures against corruption or efforts to enhance integrity within the context of the Lukoil case. In general, the media narrative was perceived as more reactive to events and allegations rather than highlighting systemic reforms or integrity-building initiatives.



2.1.3 Overview of political parties mentions per source type

 Table 11:
 The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

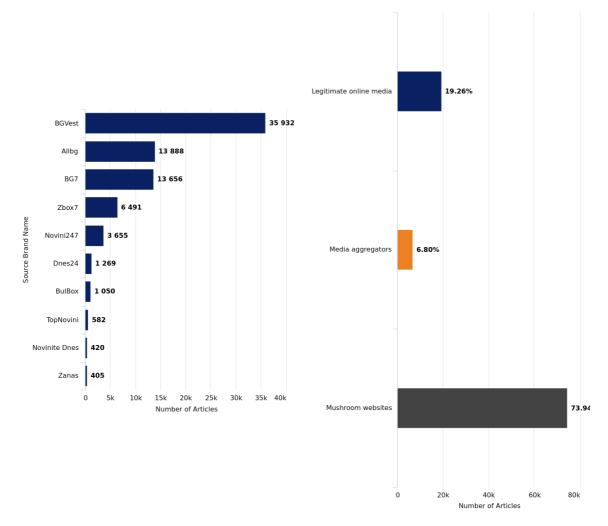
The monitored political parties predominantly received attention from mushroom websites, which indicates that, across the political spectrum, discussions were heavily influenced by sources associated with inauthentic amplification.

GERB-SDS and PP-DB, the parties with the highest number of mentions, were notably prevalent on these sites, which potentially tried to skew the public perception with botdriven content. The mushroom websites mostly republished the disputes between the members of the two coalitions with a focus on Delyan Dobrev's statements (republished from <u>Blitz</u>).

DPS maintained a significant online presence on both legitimate (<u>NOVA</u>) and mushroom websites (<u>BGUtro</u>), which highlighted DPS members' statements about the derogation.

Meanwhile, and despite its moderate presence in legitimate media, BSP was notably more prominent on mushroom sites (<u>BGVest</u>, republishing <u>Blitz</u>). The party drew the media's attention with its opposition to several votes in Parliament related to the Lukoil case (<u>Dir</u>).

Less mentioned parties, such as Vazrazhdane (<u>Varna24</u>) and ITN (<u>DARIK</u>), both of which criticized the parliamentary decisions for the derogation, also saw a disproportionate share of their mentions in mushroom websites, a fact underscoring a digital landscape where genuine engagement is overshadowed by inorganic activity.

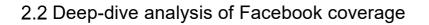


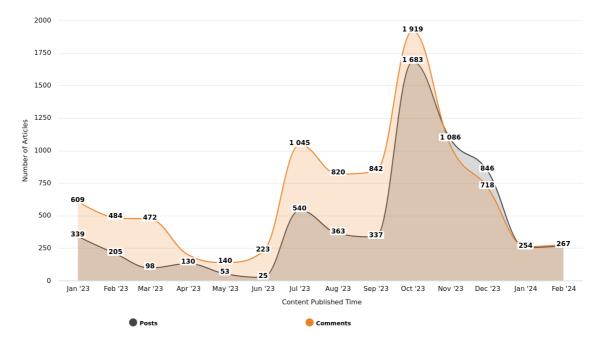
2.1.4 Overview of the top online sources and source type distribution

 Table 12: The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

Mushroom websites, especially BGVest, dominated the information landscape with the highest number of articles, followed by other similar platforms like All.bg and BG7. On the other hand, Novini247, BulBox, and Novinite Dnes stood out as the aggregators that contributed with a more moderate share of the conversation.

No legitimate media outlet ranked among the top ten sources by volume, despite legitimate media accounting for a higher overall percentage of articles compared to media aggregators. The overwhelming dominance of mushroom websites in the published content, alongside the more measured contribution from legitimate sources, paints a media landscape, in which quantity does not always correlate with quality or credibility.



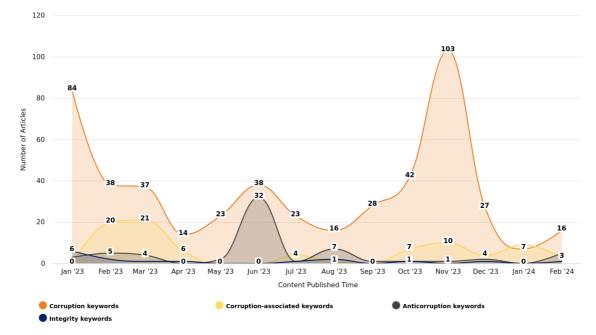


2.2.1 Overview of volume distribution of original posts and comments

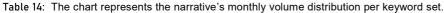
Table 13: The chart represents the narrative's monthly volume distribution divided by type of activity: posts and comments.

The chart shows a pronounced peak in October 2023, correlating with the intensive parliamentary discussions on Lukoil's derogation and the proposal to revoke it led by GERB-SDS. This suggests that legislative actions have the potential to significantly amplify social media engagement. Another notable surge occured in July 2023 and was tied to the parliamentary vote on terminating Lukoil's concession at Rosenets oil port.

Throughout the year, the distribution of Facebook posts and comments fluctuated, with posts often serving as catalysts for peaks in comments, indicating that key events not only prompt initial discussions but also foster extended conversations among users. The ratio of comments to posts appears to swell during periods of heightened public interest, particularly in October and July, underscoring the role of social media as a reactive space for public discourse on pressing political and economic issues.



2.2.2 Overview of the four keyword sets

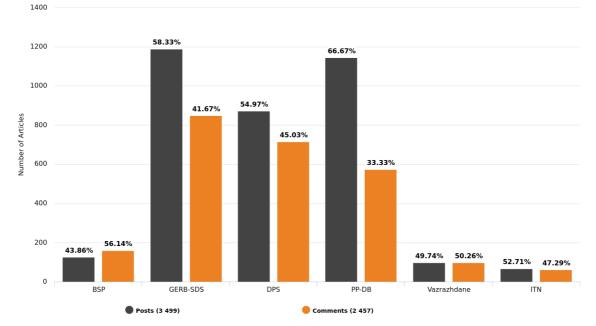


The chart tracking the mentions of the different keyword sets in the context of the Lukoil case reveals varied peaks, indicating differing levels of engagement over time.

Notably, there was a surge in corruption keywords in January 2023, which corresponds with an activity by one user who posted identical critical of Boyko Borisov messages under different posts, artificially inflating the presence of this topic. Similarly, an anticorruption peak in June can also be attributed to the same user who this time focused on the Russian influence in Bulgaria. The user's multiple reposts suggest deliberate attempts to shape the narrative around these periods.

In November, the corruption keyword set saw another volume increase, predominantly within user comments, likely driven by the news of Lukoil circumventing sanctions against Russia through Bulgaria. This particular peak reflects genuine user engagement, as opposed to the former bot-driven spikes.

The corruption-associated and integrity keywords show more subdued trends, indicating that these aspects of the Lukoil discourse were less sensational. The majority of posts containing integrity-related keywords were more sarcastic than complimentary when referring to individuals associated with PP-DB.



2.2.3 Social coverage of the political parties

Table 15: The chart illustrates the Facebook engagement with the narrative, broken down by political parties and type of activity: posts and comments.

GERB-SDS's legislative moves sparked considerable commentary, reflecting their centrality in the public debate. DPS's high engagement ratio also indicates that the party played a significant role in these discussions, potentially due to its collaborative efforts with GERB-SDS on the energy legislation.

PP-DB's positions, particularly their stance on emergency parliamentary proceedings, prompted a substantial number of comments, pointing to the coallition's pivotal role in the narrative.

BSP and Vazrazhdane's balanced mix of posts and comments was mostly due to the public reaction to their unified stance against terminating Lukoil's Rosenets port concession.

For their part, ITN's activities, especially statements like those from Toshko Yordanov, also received various user engagements.

The overall data indicates a complex dialogue in which each party's involvement in the Lukoil case elicited varied levels of user-initiated posts and responsive commentary, contributing to nuanced conversations.

2.2.4 Top 10 social authors

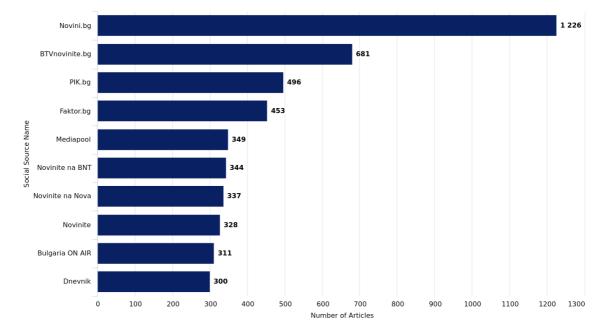


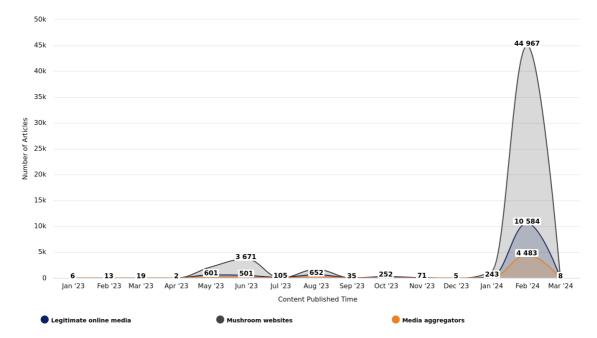
Table 16: The chart displays the top 10 social authors who posted on or received comments related to the narrative during the monitored period.

The chart shows that the social authors that created original posts or received the most comments were official pages of legitimate media outlets. The media outlet with the highest combined number of posts and comments Novini.bg far surpasses its counterparts, suggesting that its coverage may have been perceived as particularly engaging, sparking various discussions. Meanwhile, the other outlets show a relatively similar engagement distribution. Overall, the data reflects an active online community that not only seeks information from these official pages but also participates extensively in the conversation through comments.

3 External influences on the judiciary system

The narrative about the Bulgarian judiciary's external influences, through racketeering, blackmail, bribery and influence peddling, included mentions of individuals such as the former Chief Prosecutor Ivan Geshev, the current acting Chief Prosecutor Borislav Sarafov, criminal investigator Petar "the Euro" Petrov and Martin "the Notary" Bozhanov, who was shot and killed in early February (Capital). As part of the discourse surrounding the narrative in both Online media and Facebook, Chief Prosecutor Borislav Sarafov was linked to the infamous "Eight Dwarfs" restaurant and Petar Petrov (Frognews), while ex-Chief Prosecutor Ivan Geshev was linked to Martin Bozhanov's SS Club (Mediapool). After the death of the latter and the revelations that his club was visited by members of the judiciary (Eurocom), the focus of the narrative shifted away from Petar Petrov.





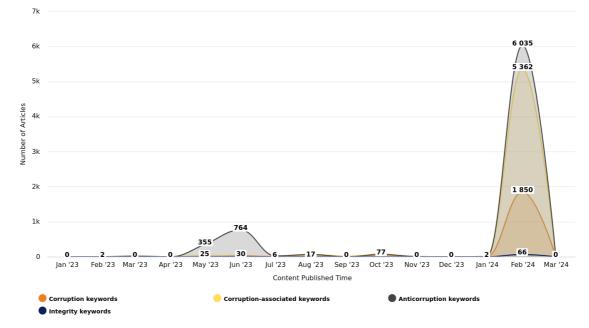
3.1.1 Overview of the narrative coverage segmented by source types

 Table 17:
 The chart represents the narrative's monthly volume distribution divided according to the three source types:
 legitimate online media, mushroom websites and media aggregators.

The narrative coverage on the judiciary's external influences saw distinct spikes in May, June and August 2023, as well as a significant shift in January 2024 corresponding to Martin Bozhanov's death. In May, a surge in articles from legitimate media, media aggregators and mushroom websites centered on the Anticorruption Fund's (ACF) exposure of acting Chief Prosecutor Sarafov and Petar Petrov's meeting, highlighted by legitimate sources like <u>Frognews</u> and <u>PIK</u>, as well as by media aggregators such as <u>Novini247</u>. This period also saw accusations and operational raids linked to Petrov, with varying coverage tones across source types, from neutral to highly speculative, including mentions in mushroom websites like <u>Allbg</u> and legitimate outlets such as <u>BNT</u> <u>News</u>.

In January 2024, after the killing of Martin Bozhanov, the narrative volume shifted dramatically, resulting in a 500% increase in content. The aggregator <u>Novini247</u> and the legitimate source <u>Plovdiv24</u> primarily commented on his alleged connections with Petrov.

Throughout the entire monitored period, a distinct pattern of publishing for each source type was observed: legitimate media outlets picked up on the events and reported on them extensively; media aggregators, though slightly lagging, republished articles that retained varying opinions on the subjects; mushroom websites spread only sensational-sounding headlines with little to no nuance. One such example is the article by the legitimate online media <u>Petel</u>, which was spread extensively by <u>BGUtro</u>.

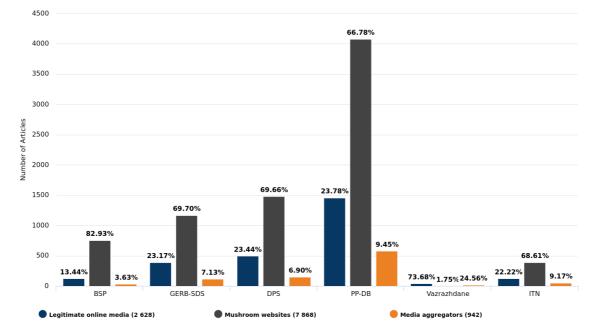


3.1.2 Overview of the four keyword sets

Table 18: The chart illustrates the narrative's overall volume distribution per month and per keyword set.

In the narrative's context, the majority of the published content focused on corruption and its associated terms. Anticorruption themes were also prominent, following closely behind in terms of content volume. The articles touching on integrity were notably less frequent, representing a minimal fraction of the overall published material.

The content related to corruption peaked in October 2023 and February 2024. The initial surge was due to a legitimate online media outlet (<u>BGNES</u>) alleging Petar Petrov had offered a BGN 10,000 bribe to some prosecutors at the European Public Prosecutor's Office. The second peak was due to PP-DB co-chair Atanas Atanasov's assertion that Martin Bozhanov's judiciary actions epitomized corruption (<u>BNT News</u>). Keywords on anticorruption were increasingly used in May and June 2023, and again in February 2024, due to ACF's exposure, which included a two-part interview with Petar Petrov's ex-wife Lyubena Pavlova (<u>Mediapool</u>) and ACF Director Boyko Stankushev's comments on the possible motives for Bozhanov's murder (<u>NOVA</u>). For their part, integrity mentions peaked in June 2023 and February 2024, first due to Judge Krasimir Mazgalov's criticisms of Borislav Sarafov's integrity and association with Petar Petrov (<u>Actualno</u>), and then due to Lozan Panov's insistence that the Prosecutor's Office should be led by someone of "high professional integrity" (<u>BNR</u>).

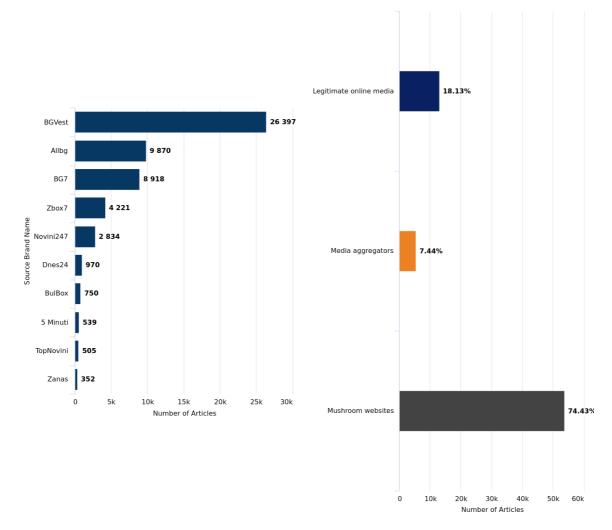


3.1.3 Overview of political parties mentions per source type

Table 19: The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

Mushroom websites were the primary sources discussing the political parties, followed by legitimate media and then aggregators. The most covered parties were PP-DB and DPS. The former was discussed in relation to DB chair Atanas Atanasov, who mentioned receiving a list of members from a private club linked to the deceased Martin Bozhanov (Dnevnik), with mushroom websites like Allbg republishing an article from the legitimate outlet Politikata. The DPS coverage was divided into two main topics. The first focused on an interview with MP Hamid Hamid from Blitz regarding the Bozhanov case, which was almost exclusively (99.5%) republished by mushroom websites (Dnes24). The second topic revolved around Delyan Peevski, co-chair of the DPS parliamentary group, who proposed a commission to investigate Bozhanov's associates. It received about 80% coverage from legitimate media (Radio Free Europe Bulgaria).

The GERB-SDS mentions were primarily in the context of a commission assigned to investigate the Bozhanov case (NOVA). Furthermore, <u>BSP</u> leader Kornelia Ninova commented that this commission could be used for exerting political pressure (<u>PlovdivNews</u>). Vazrazhdane was mentioned regarding the investigative commission, with MP Zlatan Zlatanov suggesting that it aimed to divert attention from more significant issues (<u>BTA</u>). On a related note, ITN's Grozdan Karadzhov proposed the inclusion of prosecutors, the National Revenue Agency's director, as well as Finance Minister Asen Vasilev in the investigations (<u>BNR</u>).

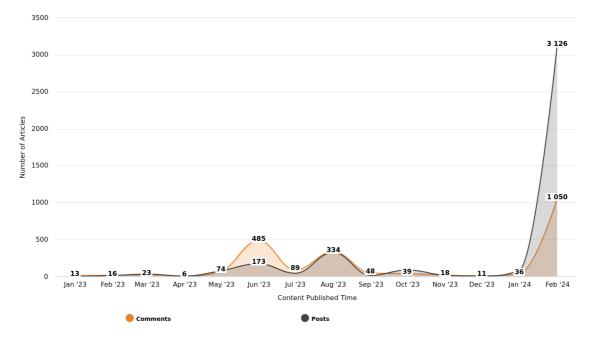


3.1.4 Overview of the top online sources and source type distribution

Table 20:The charts display the top 10 sources that commented on the narrative and the volume distributionper source type: legitimate online media, mushroom websites and media aggregators.

The legitimate media outlet with the highest number of articles about the narrative was 24Chasa, contributing a small fraction to both the overall content and the content published by similar sources. Among media aggregators, Novini247, BulBox, and 5 Minuti were the leading contributors, making up a significant portion of the total content from aggregators. The most active sources overall were mushroom websites, including BGVest, Allbg, BG7, and Zbox7, which collectively produced a major share of the narrative's content.

3.2 Deep-dive analysis of Facebook coverage



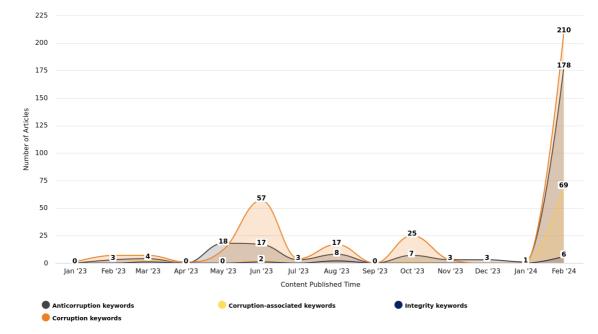
3.2.1 Overview of volume distribution of original posts and comments

Table 21: The chart represents the narrative's monthly volume distribution divided by type of activity: posts and comments.

The Facebook conversation about the judiciary's external influences mirrored online media peaks from the end of January into February, driven by news articles shared on the platform. Notably, a spike in comments on 16 June 2023 (absent in online media) was related to Borislav Sarafov's appointment as acting Chief Prosecutor. Many commenters linked Sarafov to Petar Petrov, suggesting Petrov's "safe return" due to their "friendship", a connection not highlighted by online sources.

In August, comments on the accusations against Petrov and Lyubena Pavlova in the Eight Dwarfs case constituted only a fifth of the content, with the remainder being shared articles, indicating limited interest in the accusations among Facebook users. Petrov's rumored death on 18 August 2023 almost equally split comments and posts, featuring prominently on pages like Novini.bg and Vazrazhdane's Kostadin Kostadinov.

At the end of January 2024, following Martin Bozhanov's assassination, a notable increase in activity resembled the trends in online media, with a significant portion of the Facebook content stemming from news websites. Comments made up a smaller portion of the content, with Petrov being a frequent subject of discussion, contrasting with his limited mentions in online media content from the same period.



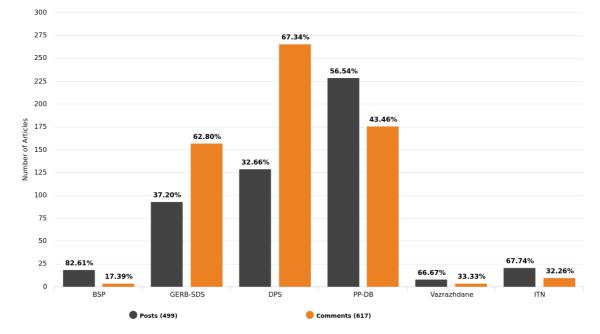
3.2.2 Overview of the four keyword sets

Table 22: The chart represents the narrative's monthly volume distribution per keyword set.

On Facebook, discussions about corruption and the related topics were more prevalent than anticorruption and integrity themes. The term "corruption" was mentioned more frequently on Facebook than in online media, whereas online media had a higher occurrence of corruption-associated keywords compared to Facebook. A significant portion of the corruption mentions on Facebook were in the form of comments rather than original posts. Following the appointment of Borislav Sarafov as an acting Chief Prosecutor, a large number of comments shared under news outlets' Facebook pages criticized the new appointee as "corrupt and dependent", linking him to prominent political figures, with a tone of sarcasm regarding political change and the fight against corruption.

The Facebook peaks related to anticorruption coincided with those on news websites. However, on 15 February 2024, there was a spike in repetitive comments on Facebook pages: 47% of them were sarcastically asking if PP's Boyko Rashkov, dubbed "a fighter against corruption", knew Petar Petrov.

Integrity keywords were the least mentioned (1%), with 40% related to Judge Vladislava Tsarigradska.

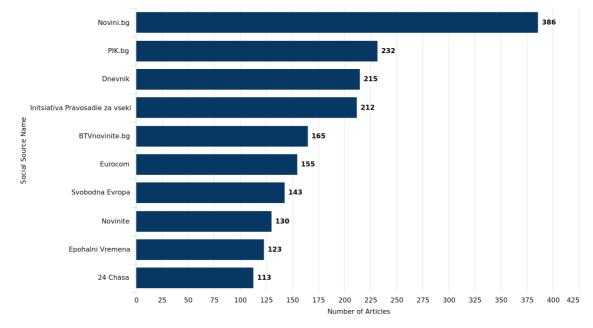


3.2.3 Social coverage of the political parties

Table 23:The chart illustrates the Facebook engagement with the narrative, broken down by political partiesand type of activity: posts and comments.

The PP-DB coalition emerged as the most frequently mentioned political group in the discussions, reaching a significant peak in February 2024 when media Facebook pages extensively covered Nicola Minchev's remarks on the parliamentary commission investigating Martin Bozhanov's case. DPS followed as the second most highlighted political party, especially during the period when Delyan Peevski advocated for a commission to probe into Martin Bozhanov and his associates (<u>BTA</u>). Shortly after, GERB-SDS also captured the users' attention by endorsing the proposal for the investigative commission. In terms of comments, PP-DB, DPS and GERB-SDS saw a spike in mentions due to a critical commentary on their alleged links to Martin Bozhanov, alongside comments on the Bulgarian justice system's efficacy.

The content related to ITN, Vazrazhdane and BSP indicated a different dynamic, with a noticeable difference in the ratio of posts to comments. The discussions about ITN were often tied to the commission's activities, while BSP was mentioned in the context of Kornelia Ninova's statements regarding Bozhanov (Focus-news). Vazrazhdane was less prominent but appeared in various daily news recaps.



3.2.4 Top 10 social authors

Table 24:The chart displays the top 10 social authors who posted on or received comments related to thenarrative during the monitored period.

The most influential authors in relation to the narrative were mostly the Facebook pages of media websites with one notable exception: Initiativa Pravosadie za Vseki [Justice for All Initiative]. It is characteristic for this Facebook page to share links to articles from various online media and provide commentary, usually in the form of quotes, on the information more so than on the tonality of the said articles.

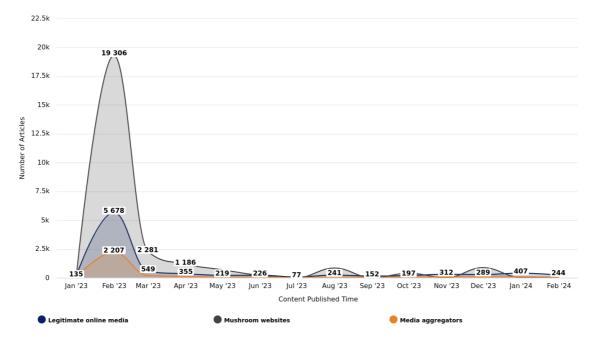
The rest of the active Facebook pages belong to legitimate online media outlets that used their social media presence to popularize their own articles concerning the narrative. Novini and PIK saw a higher number of comments compared to posts. On the other hand, Dnevnik leaned towards more original posts, particularly active during the late January and early February period, focusing on the demise of Martin Bozhanov.

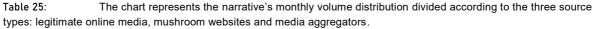
4 Magnitsky and the UK Sanctions

In February 2023, the UK and US governments took a coordinated stand against corruption in Bulgaria by imposing sanctions on key figures involved in corrupt practices (Gov.uk). This move underscored the international effort to address corruption within Bulgaria, identified by Transparency International as one of Europe's most corruptionaffected countries. The UK sanctions targeted three influential individuals: Delyan Peevski, a former MP and media mogul known for his attempts to control Bulgarian institutions through bribery; Ilko Zhelyazkov, a former national security official who manipulated his position for personal gain; and Vasil Bozhkov, Bulgaria's wealthiest individual with extensive involvement in the gambling industry. Concurrently, the US announced sanctions under the Magnitsky Act against five Bulgarians, including two former ministers, Vladislav Goranov (GERB) and Rumen Ovcharov (BSP), for their involvement in corrupt activities, notably in the energy sector (Radio Free Europe). These measures highlighted the urgency of dismantling networks perpetuating illegal actions and emphasized the support for Bulgaria's fight against corruption and foreign influence, aiming to protect democratic institutions and promote the country's economic growth.

4.1 Deep-dive analysis of the online content

4.1.1 Overview of the narrative coverage segmented by source types

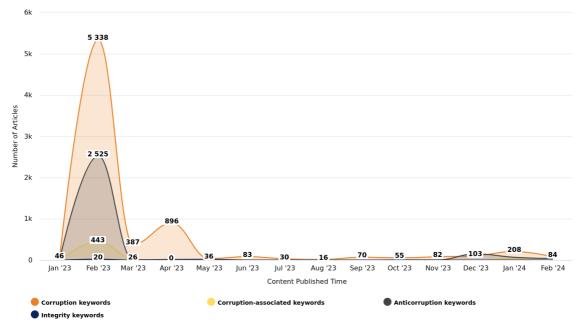




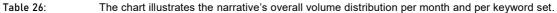
The chart depicting the media coverage of the Magnitsky and UK sanctions against Bulgarian individuals reveals a pronounced peak in February 2023, aligning with the announcement of the sanctions.

Notably, mushroom websites, such as <u>BGUtro</u>, heavily republished content originally from legitimate media outlets, such as <u>Petel</u>. Legitimate media provided detailed reporting and analysis on the implications of the sanctions, contributing to the initial surge in coverage. Mushroom websites, despite their typical lean towards sensationalism, here acted as amplifiers of the mainstream narrative, reflecting the gravity of the international sanctions in the national discourse. Media aggregators (<u>Infomreja</u>), often serving as content curators, contributed by spreading the news further, although their engagement level appears subdued compared to the mushroom websites.

This distribution highlights the interplay between various media types in disseminating critical political developments and suggests a unifying moment in media coverage due to the sanctions' international significance.

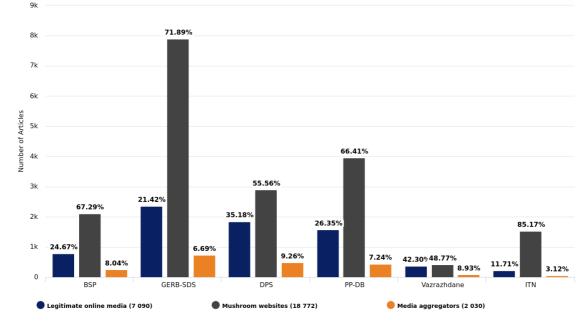


4.1.2 Overview of the four keyword sets



The significant spike in mentions of all keyword sets in February aligns with the announcement of the sanctions. The corruption keywords were primarily used in the extensive coverage that details the involvement of prominent figures like Vladislav Goranov and Rumen Ovcharov in corrupt activities (Radio Free Europe). In terms of anticorruption, the notable spike in articles, such as the one by <u>Actualno</u> discussing the support of the USA and the UK for Bulgaria's fight against corruption, suggests a focus on the international partnership and solidarity, emphasizing the broader efforts to tackle the systemic problem. The corruption-associated keyword set also sees a rise in usage, although not as pronounced as the former categories. An example is an article from <u>BTV</u>, according to which Rumen Ovcharov denies the allegations of receiving a bribe and owning offshore accounts. Lastly, the integrity keyword set witnesses a smaller, yet significant uptick, reflecting a push from allies and supporters of the sanctioned individuals to restore their public image. This is exemplified by GERB member Temenuzhka Petkova's statement about Vladislav Goranov's honesty and his intent to prove his integrity in the coming months (<u>Novini247</u>).

This data suggests that while the corruption and anticorruption keywords dominate the coverage, there's a nuanced use of corruption-associated and integrity keywords, pointing to personal defenses and the impact of these sanctions on individual reputations.



4.1.3 Overview of political parties mentions per source type

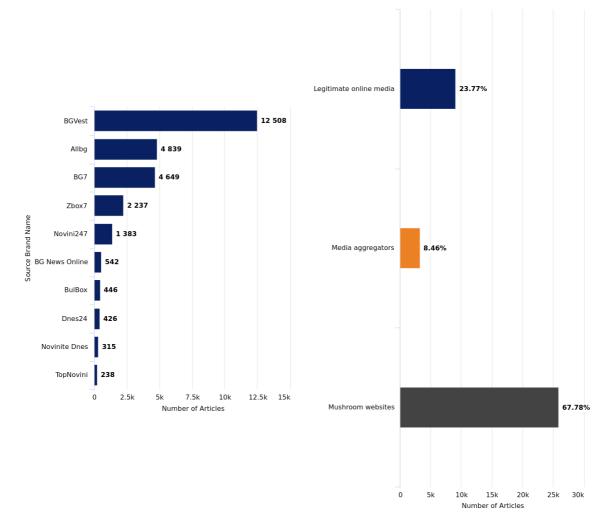
 Table 27:
 The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

The media coverage of the Magnitsky and UK sanctions concerning Bulgarian individuals reveals interesting trends across the political parties and the types of sources reporting on them.

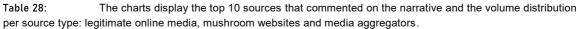
GERB-SDS, with its member Vladislav Goranov among the sanctioned, dominated the mentions, as mushroom websites (<u>BGUtro</u>) paid significant attention to it. Similarly, DPS's connection to Delyan Peevski also translated into widespread media coverage, hinting at the party's intent to shape perceptions around the controversy (<u>Radio Free</u> <u>Europe</u>). Concerning BSP, the spotlight fell on Rumen Ovcharov with mushroom websites (<u>Allbg</u>) in the lead, possibly affecting the party's public image through strategic content dissemination.

For its part, PP-DB's coverage focused on analyzing the sanctions' potential electoral impact, suggesting a consideration of the political ramifications (Capital). Vazrazhdane's fewer media mentions included sharp commentary from its members (Flagman, Fakti, 24chasa), with mushroom websites echoing the party's emphasis on national sovereignty and judicial independence. ITN's coverage was skewed by mushroom sites, with a high reproduction rate of particular articles, such as those quoting Toshko Yordanov's statement from December 2023 (BNT).

The type and source of media not only shaped each party's sanction-related narrative but also underscored the media landscape's role in political discourse, where the coverage volume, angle, and goals significantly diverge among the different platforms.



4.1.4 Overview of the top online sources and source type distribution

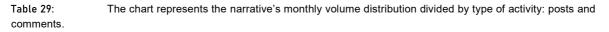


The analysis of the media's engagement illustrates varied attention across the different types of sources. Despite mushroom websites, such as BGVest and Allbg, leading with the highest number of articles, aggregators like Novini 247 and BulBox also contributed to the overall results, which highlights the importance of these platforms in disseminating information. For their part, the legitimate sources accounted for almost 24% of the coverage, a significant share that underscores the topic's actual relevance and the seriousness with which it was treated by more established media outlets. The fact that no legitimate sources appear among the top publishers might suggest a strategic focus on such topics by mushroom websites. However, the presence of a substantial percentage of legitimate media coverage indicates that the public does have access to a range of perspectives on the issue.

4.2 Deep-dive analysis of Facebook coverage

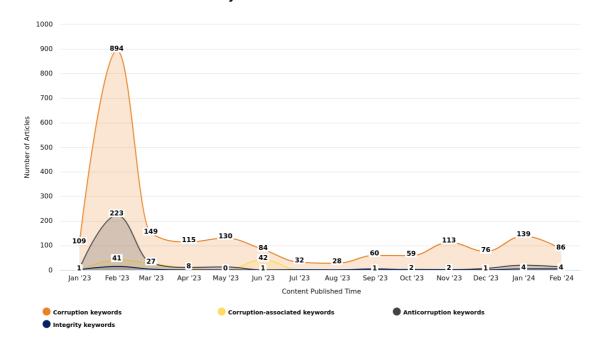
4000 3 842 3500 3000 2500 Number of Articles 2 366 2000 1500 496 1 266 1 167 1 1 0 4 1 1 1 7 1000 976 785 762 722 500 455 287 173 102 -72 62 0 Feb '23 Mar '23 Sep '23 Oct '23 Dec '23 Feb '24 Jan '23 Apr '23 May '23 Jun '23 Jul '23 Aug '23 Nov '23 Jan '24 Content Published Time Posts Comments

4.2.1 Overview of volume distribution of original posts and comments



The notable spike in activity in February 2023 aligns with the announcement of the sanctions. This surge is characterized by a significant number of original posts, suggesting a strong drive to share and discuss the new developments.

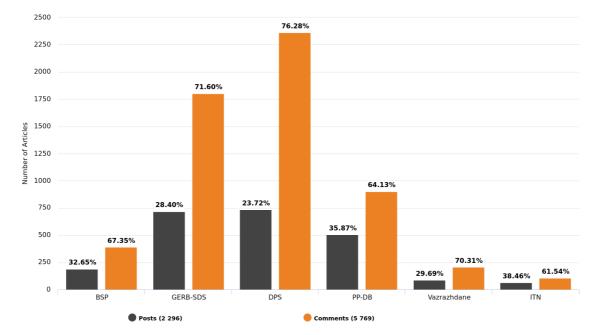
The conversation did not wane after the initial peak; instead, it continued with a steady flow of posts over the following months. The number of comments remained consistently high throughout the period, pointing to an ongoing dialogue among the users. The latter also illustrates that the implications of the sanctions resonated beyond the immediate news cycle, indicating a lasting impact on public opinion and sustained interest in the subject of high-level corruption in Bulgaria. Last but not least, the fact that individuals like Delyan Peevski were frequently mentioned, with nicknames such as "Mr. Magnitsky", additionally highlights the personalization of the issue.



4.2.2 Overview of the four keyword sets

Table 30: The chart represents the narrative's monthly volume distribution per keyword set.

The term "corruption" saw an increase of mentions in February, aligning with the announcement of the sanctions. For its part, the use of anticorruption keywords showcased the supportive reactions towards the efforts to combat corrupt practices, reflecting a societal push for transparency and the rule of law. At the same time, corruption-associated keywords maintained a medium presence in the discussions, underscoring the nuanced conversation around the broader implications of the corrupt activities. Finally, the integrity keywords category was characterized by its comparatively low numbers, i.e. the users did not pay any special attention to this angle.



4.2.3 Social coverage of the political parties

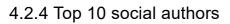
Table 31: The chart illustrates the Facebook engagement with the narrative, broken down by political parties and type of activity: posts and comments.

The analysis of the Facebook engagement concerning the Magnitsky and UK sanctions against Bulgarian individuals reveals distinct patterns of interaction with the content related to the different political parties.

DPS led the conversation, with the comments significantly outweighing posts (although this was valid across all parties). Among the key points of discussion here was the party's connection to the sanctioned individuals, particularly Delyan Peevski. GERB-SDS followed in second place due to its affiliation with Vladislav Goranov.

PP-DB and BSP came in third and fourth place respectively. These parties were mainly mentioned in relation to their members' statements about the sanctions.

Vazrazhdane and ITN had the lowest number of mentions. However, the latter were very consistent, which points to a more concentrated but attentive audience interested in these parties' stance regarding the sanctions.



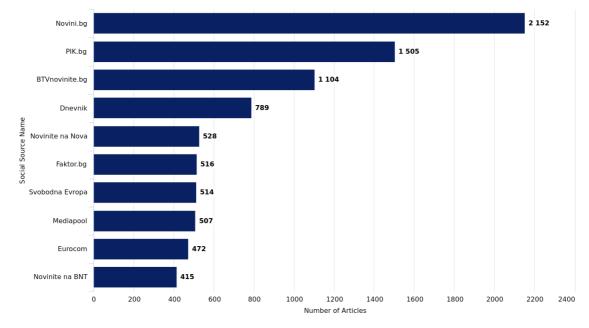


 Table 32:
 The chart displays the top 10 social authors who posted on or received comments related to the narrative during the monitored period.

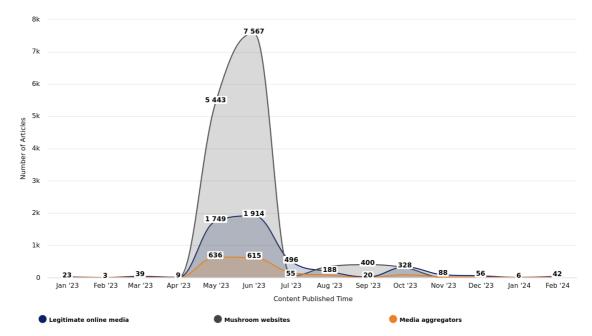
Novini.bg leads as the most prolific public page, with a combined total of 2,152 posts and comments, showcasing the dominance of the legitimate media outlet's account in the discussion of this topic. In addition, the high volume reflects the page's pivotal role in informing and engaging the public on matters of national political relevance. PIK.bg, known for its sensationalized content, stands out as the second most engaging page with a total of 1,505 posts and comments. Some of PIK's original posts received more than 100 comments each, while the most commented on was a shared article about the "Magnitsky deception" (PIK). Other reputable sources, such as BTV, Dnevnik and NOVA, also spurred a substantial number of discussions and interactions among the users.

The overall trend underscores a vibrant social environment where official media pages serve not just as news outlets but as hubs for community engagement, debate and the exchange of ideas on topics of national significance.

5 Barcelonagate case

The Barcelonagate case emerged as a scandal implicating GERB's leader Boyko Borisov in alleged money laundering associated with a Barcelona property purchase, initially sparked by leaked recordings in 2016. The case gained significant attention in February 2020, when Spanish authorities investigated Borisov's potential involvement in the scheme. This prompted Bulgarian prosecutors to launch their own inquiry, though it was ultimately closed to prevent duplication of efforts with the Spanish investigation. Under the leadership of Former Chief Prosecutor Ivan Geshev, who was perceived as aligned with Borisov's party, the Bulgarian prosecution's handling of the case faced criticism for delays and lack of progress. Borisov's political adversaries often mentioned the scandal, but it lost traction over time as Borisov's camp managed to mitigate its impact. Subsequently, the case's closure in October 2023 by the State Prosecution, led by the acting Chief Prosecutor Borislav Sarafov, underscores ongoing challenges in addressing corruption within Bulgaria's legal system. All this has cast doubts on the efficacy of domestic reforms and signaled a reliance on external oversight, such as investigations by the European Prosecution Office, for accountability (<u>Capital</u>).

5.1 Deep-dive analysis of the online content



5.1.1 Overview of the narrative coverage segmented by source types

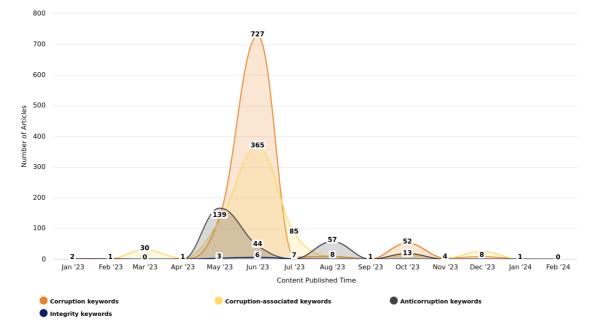
Table 33:The chart represents the narrative's monthly volume distribution divided according to the three sourcetypes: legitimate online media, mushroom websites and media aggregators.

There is a significant surge in media coverage in May and June 2023, which aligns with key developments in the investigation of the Barcelonagate case. Mushroom websites, often characterized by rapid and extensive spread of information, dominated the conversation in terms of volume during these months. The legitimate media's presence is substantial as well, suggesting a similar pattern across diverse news outlets. The coverage formed by media aggregators throughout the period, although less pronounced, ensures the persistence of the topic in public discourse.

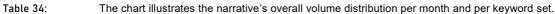
The peak in May 2023 was related to Former Deputy Chief Prosecutor Borislav Sarafov's signal against Former Chief Prosecutor Ivan Geshev (<u>BNT</u>), which sparked widespread media attention. Sarafov alleged that Geshev had exerted influence on the supervising prosecutor of Barcelonagate.

The second peak in June 2023 was even more pronounced and was linked to the developments surrounding the request to lift the parliamentary immunity of Former Prime Minister Boyko Borisov because of the lawsuit (<u>Actualno</u>).

Notably, there is a notable drop in coverage post-June, across all sources, with a slight resurgence in October 2023 from legitimate sources due to the dismissal of the lawsuit (NOVA).



5.1.2 Overview of the four keyword sets

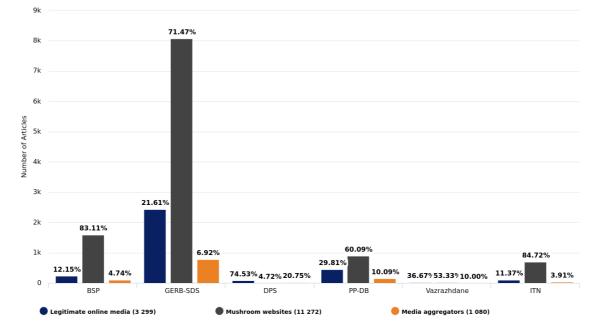


The peaks in the graph correspond with key developments, marked by a surge in the usage of both corruption and corruption-associated keywords.

The significant spike in June 2023, mentioning corruption and corruption-associated keywords was related to the lifting of Borisov's immunity which triggered political reactions, accusations of corruption, and calls for further investigation (<u>Actualno</u>).

Meanwhile, anticorruption keywords maintain a consistent presence, though they are less prevalent than corruption keywords. The Anticorruption Fund is frequently mentioned in the context of the Barcelonagate case. In May 2023 the comments of the fund's director, Boyko Stankushev, on the key witness Ivayla Bakalova's insights for the case drew the media attention (<u>Dnevnik</u>).

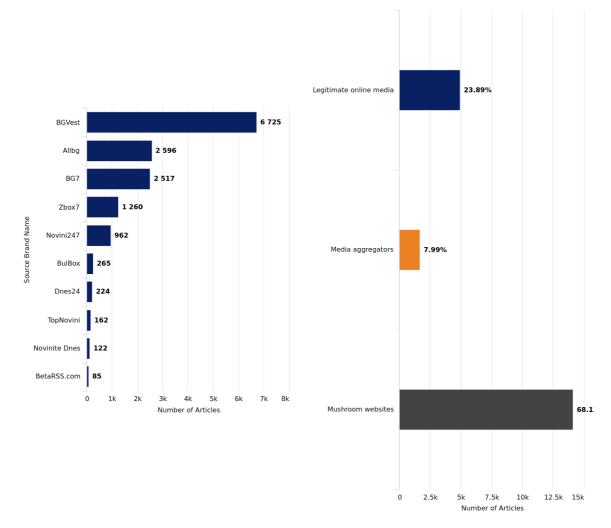
Meanwhile, the usage of integrity keywords remains consistently low. Several media outlets such as <u>Sofia Daily Express</u>, stated that the PP's member Miroslav Ivanov commented that Boyko Borisov had to give up his immunity so that he proved that he was a person of integrity.



5.1.3 Overview of political parties mentions per source type

Table 35:The chart illustrates the volume distribution of the political parties within the narrative, broken down
by source type: legitimate online media, mushroom websites and media aggregators.

GERB-SDS was the most mentioned party across all media types indicating their prominent role in the Barcelonagate narrative, with both mushroom websites and legitimate media sources emphasizing Boyko Borisov's interrogation by the Sofia City Prosecutor's Office and the Supreme Cassation Prosecutor's Office concerning the case and the allegations of abuse of power (BG7). Media aggregators followed the same trend. BSP followed GERB-SDS in the number of mentions, particularly on mushroom websites, which dominated their coverage, spotlighting BSP leader Ninova's remarks on the Barcelonagate case and her criticism of President Rumen Radev for supporting PP (The Mainline). Meanwhile, legitimate sources echoed BSP's call for Boyko Borisov to waive his immunity, cautioning against jeopardizing the National Assembly (BNT). Legitimate media mentioned PP-DB mainly in the context of their abstention from voting for Borisov's immunity in June 2023 (Radio Free Europe), while musroom websites disseminated Ivaylo Mirchev's, a member of PP-DB, comments on how five years ago none of the national television stations covered Barcelonagate (Dnevnik). Despite having less media coverage, ITN is notably featured on mushroom websites. Information that emerged from the legitimate media Blitz and was spread by the mushroom source was Kornelia Ninova's statement about her struggle to access Barcelonagate documents in parliament records. She attributed this difficulty to prior requests made by ITN deputies Grozdan Karadzhov, Vladislav Panev, and Toshko Yordanov (Sportove). Vazrazhdane and DPS receive less overall attention and are mentioned only incidentally across various media outlets.

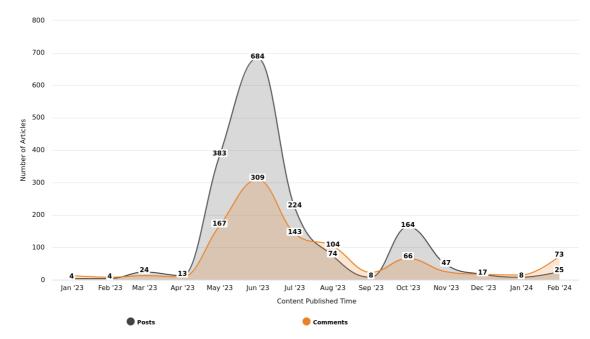


5.1.4 Overview of the top online sources and source type distribution

Table 36:The chart illustrates the volume distribution of the political parties within the narrative, broken down
by source type: legitimate online media, mushroom websites and media aggregators.

The charts indicate that the narrative is predominantly propagated by mushroom websites, with the four leading sources being among them. Moreover, the lack of legitimate media outlets among the top sources in the first chart suggests that the Barcelonagate discourse is not as widely disseminated within traditional news platforms renowned for their credibility. Instead, the narrative appears to be primarily spread within mushroom websites, which can often serve as echo chambers for specific viewpoints or sensational content.

The second chart's segmentation by source types underscores this trend, with a vast majority of articles originating from mushroom websites. This disproportionate distribution raises questions about the influence of such sources on the public understanding of the Barcelonagate issue.



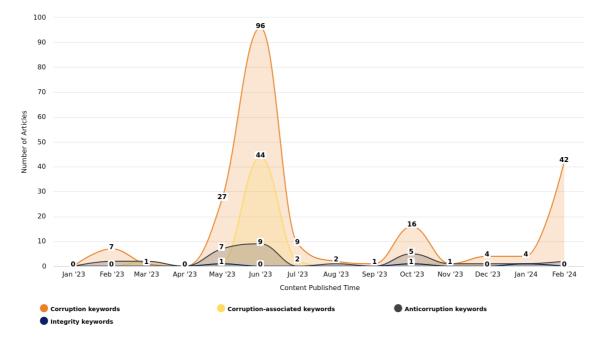
5.2 Deep-dive analysis of Facebook coverage

5.2.1 Overview of volume distribution of original posts and comments

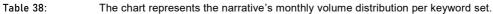
Table 37:The chart represents the narrative's monthly volume distribution divided by type of activity: posts and
comments.

Similar to online media, a significant peak in both posts and comments occurred in June 2023, signifying a period of heightened activity and engagement among Facebook users. This surge corresponded to discussions surrounding Former Chief Prosecutor Ivan Geshev's presentation of new evidence in the Barcelonagate case at the European Parliament, alongside tensions in the National Assembly over cabinet negotiations and accusations of national treason. Additionally, Geshev requested to lift Boyko Borisov's parliamentary immunity for further investigation, despite Borisov's refusal.

Following June's peak, there was a sudden decline in the number of posts and comments, with a slight resurgence in October 2023 due to the dismissal of the lawsuit and a modest increase in February 2024 after certain allegations about the connection between the Martin "The Notary" Bozhanov and Barcelonagate were presented. The comments exhibit a consistent pattern, indicating a sustained and understated dialogue among users engaged with the topic throughout the year.



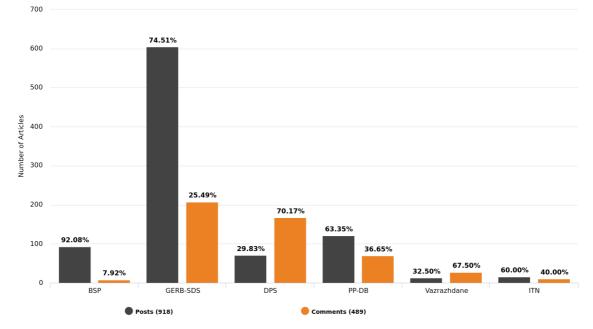
5.2.2 Overview of the four keyword sets



Conversations mentioning corruption and corruption-associated keywords surged in June 2023, particularly highlighting the correlation between corruption and Boyko Borisov in the context of the Barcelonagate case.

Interestingly, the anticorruption keywords did not experience significant peaks or mentions, although there was a minor increase in June 2023, particularly due to the request for the removal of Boyko Borisov's immunity.

Integrity mentions were almost negligible. They were related to the Supreme Judicial Council's lack of moral integrity and legitimacy and the doubt on its capacity to appoint a new Chief Prosecutor amid the Barcelonagate scandal.



5.2.3 Social coverage of the political parties

Table 39:The chart illustrates the Facebook engagement with the narrative, broken down by political partiesand type of activity: posts and comments.

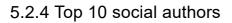
GERB-SDS saw a significant volume of mentions, mainly from posts, with a focus on Former Prime Minister Boyko Borisov's statements during his questioning about the case. This garnered considerable attention, reflecting the gravity of the case's impact on public and political opinion.

DPS's engagement on Facebook was predominantly seen in comments, indicating active public discourse. This aligns with the trend of discussions around key political figures such as Delyan Peevski and their past actions, which remained focal points in the broader narrative of political accountability in Bulgaria.

PP-DB was primarily engaged in discussions through posts, mainly from official pages of media outlets sharing their articles.

BSP has been predominantly mentioned in posts, highlighting party leader Kornelia Ninova's struggle to access documents concerning the Barcelonagate case.

Vazrazhdane's and ITN's mentions were rare, typically occurring in broader political discussions, indicating their minor role in the narrative.



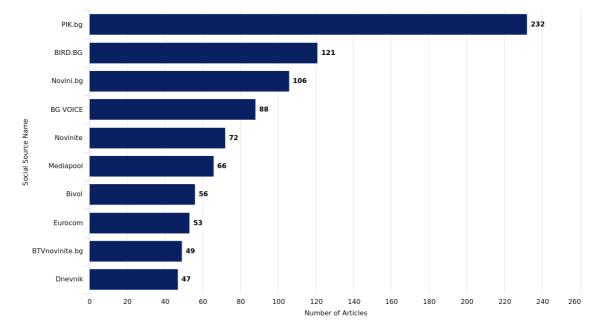


Table 40:The chart displays the top 10 social authors who posted on or received comments related to thenarrative during the monitored period.

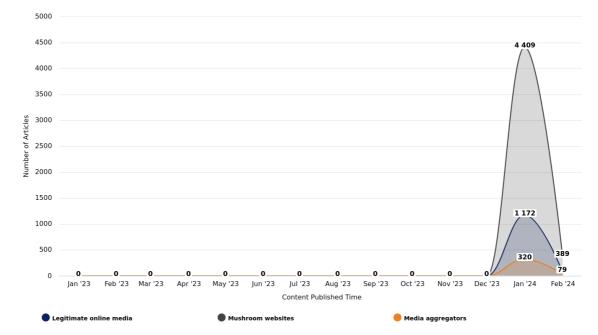
In the context of the Barcelonagate case, the top social authors on Facebook demonstrate a varied landscape of social coverage and public interaction. Dominating the conversation is PIK's page, known for its yellow journalism, which captivated a significant audience with its sensational news coverage. This style of reporting stands in contrast to other Facebook pages among the top 10, such as BIRD and Bivol, which are recognized for their investigative journalism focusing on exposing conflicts of interest, corruption, and abuses of power, signaling their critical role in the social landscape.

Other news outlets' Facebook pages like Novini.bg, BG VOICE, Novinite, Mediapool, and Eurocom, though varying in the volume of posts and engagement, reflect the breadth of public discourse, each contributing to a wider narrative with their unique editorial angles.

6 The scandal involving MP Daniel Lorer and Former Finance Minister Asen Vasilev

The investigative platform <u>BIRD</u> broke a story involving Former Finance Minister Asen Vasilev and MP Daniel Lorer, linked to dubious real estate deals on Chataldzha Street in Sofia. The allegations centered on a formerly owned by Vasilev company, STV Consulting, which supposedly evaded a BGN 5,000,000 claim from an American citizen by selling properties to Stanislava Arnaudova (<u>DARIK</u>), majority shareholder of Inteligentni Trafik Sistemi. This raised suspicions of corrupt practices, as well as claims that Lorer had sold his property at an inflated price to Arnaudova. In response, Vasilev and Lorer denied any wrongdoing, attributing the sales to market dynamics, and announced plans to sue BIRD for defamation (<u>Dnevnik</u>). GERB's Boyko Borisov and DPS's Delyan Peevski supported their defense saying that the allegations are baseless attacks (<u>BNT</u>). The case attracted the attention of the Commission for Anticorruption and Illegal Assets Forfeiture.

6.1 Deep-dive analysis of the online content

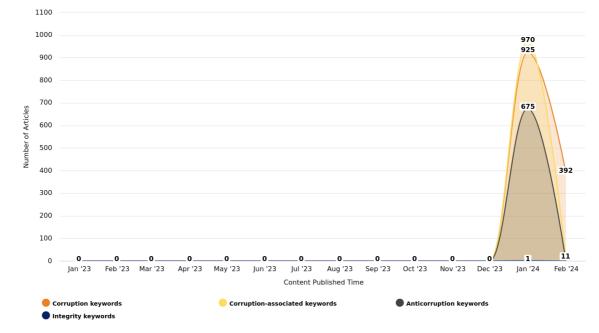


6.1.1 Overview of the narrative coverage segmented by source types

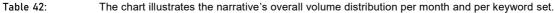
 Table 41: The chart represents the narrative's monthly volume distribution divided according to the three source types:

 legitimate online media, mushroom websites and media aggregators.

The narrative was initially spotlighted by the legitimate media outlet <u>BIRD</u>, which focused on a lawsuit filed by a US citizen. A significant peak was observed in mid-January 2024 and was dominated by mushroom websites (<u>BG7</u>, <u>Zanas</u>), which echoed headlines from legitimate online sources like Petel and Blitz. The notable surge in attention from legitimate media outlets and aggregators later in January, sparked by a BNT publication, was barely registered by mushroom websites, which showed minimal interest in it. In contrast, the beginning of February 2024 saw mushroom websites (<u>BGVest</u>, <u>Allbg</u>) overwhelmingly dominate the narrative's coverage for that period by recycling a day-old story from <u>Petel</u>.

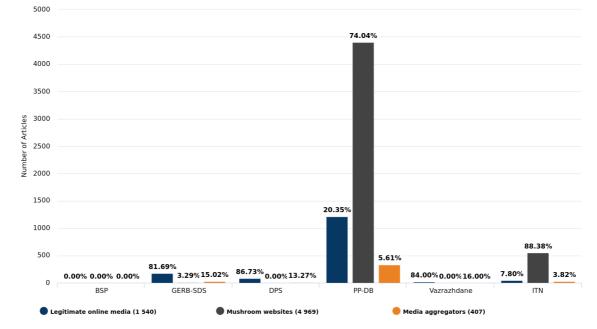


6.1.2 Overview of the four keyword sets



The content highlighting corruption and its related terms saw notable increases when Former Finance Minister Asen Vasilev addressed the corruption allegations (OFFnews) and when mushroom websites circulated the updates about Lorer and Vasilev being summoned by the anticorruption commission (BGVest). This period also saw a surge in discussions around existing anticorruption efforts. A subsequent rise in corruption-focused content occurred, spurred by alternative media platforms sharing an article from the legitimate news source, <u>Petel</u>, discussing Vasilev's intention to sue BIRD.

Integrity-themed discussions were sparked by comments from GERB-SDS MP Delyan Dobrev, who critically addressed the integrity of PP-DB (<u>BreakingNews.bg</u>).



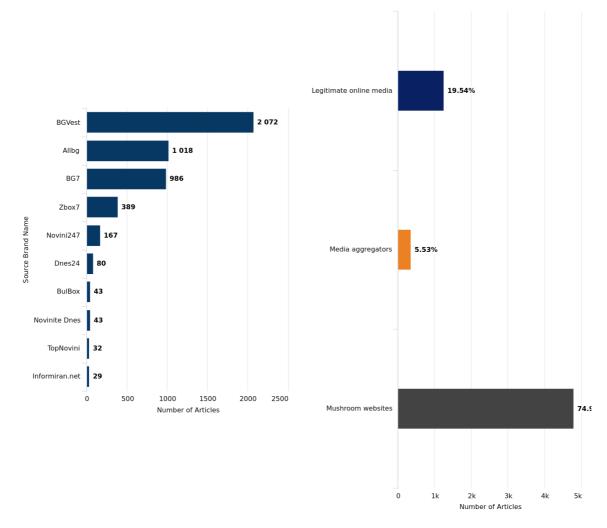
6.1.3 Overview of political parties mentions per source type

Table 43:The chart illustrates the volume distribution of the political parties within the narrative, broken downby source type: legitimate online media, mushroom websites and media aggregators.

PP-DB emerged as the most mentioned political entity, with ITN, GERB-SDS and DPS following next. ITN stood out in January, due to its MP Toshko Yordanov's reference to BIRD's investigation in the Parliament (FrogNews) and due to its MP Grozdan Karadzhov accusing PP-DB of lobbying, as reported by <u>Tribune</u>. Both instances attracted the attention of mushroom websites.

The content related to GERB-SDS was more consistently distributed over the monitored period, with a notable increase in mentions at the end of January 2024. This coincided with a <u>BNT</u> article detailing Boyko Borisov and MP Delyan Peevski's support for Asen Vasilev and Daniel Lorer, which also led to a spike in the DPS mentions.

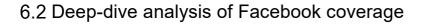
Vazrazhdane received attention due to Tsoncho Ganev's critique of PP-DB for allegedly suppressing the opposition and engaging in property fraud (<u>FrogNews</u>). Conversely, BSP was not mentioned within the narrative's context.

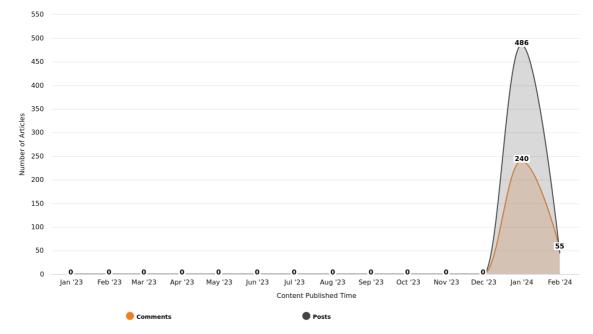


6.1.4 Overview of the top online sources and source type distribution

Table 44:The charts display the top 10 sources that commented on the narrative and the volume distributionper source type: legitimate online media, mushroom websites and media aggregators.

Mushroom websites constituted the largest portion of the content related to the narrative, followed by media aggregators and legitimate online sources. The top four sources are all mushroom websites, while the fifth, Novini247, operates as an aggregator. Among the remaining outlets, Novinite Dnes and Bulbox are also aggregators, while the rest are mushroom websites. Notably, no legitimate online media appears among the top ten sources.





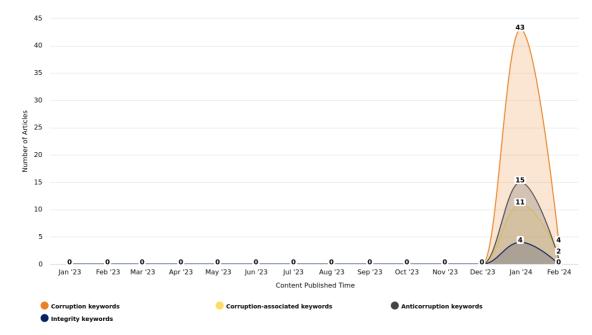
6.2.1 Overview of volume distribution of original posts and comments

There were three notable surges of Facebook activity connected to the narrative, each driven by articles shared by media pages. The first one revolved around posts about an article with the headline "The change [PP-DB] is over, it's time for the next" (<u>Trud</u>), with a considerable number of comments referencing related articles from BIRD's page.

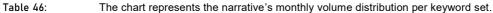
In mid-January, a surge was seen in posts from GERB's regional pages, highlighting Boyko Borisov's remarks on the imbalanced media attention regarding the apartment scandal associated with PP-DB MP Daniel Lorer (<u>LUPA</u>).

The Facebook content saw another significant uptick towards the end of January when BIRD shared news about Former Finance Minister Asen Vasilev and MP Daniel Lorer planning to sue, labeling the move as a strategic lawsuit against public participation (SLAPP) case (<u>Dnevnik</u>).

Table 45:The chart represents the narrative's monthly volume distribution divided by type of activity: posts and
comments.



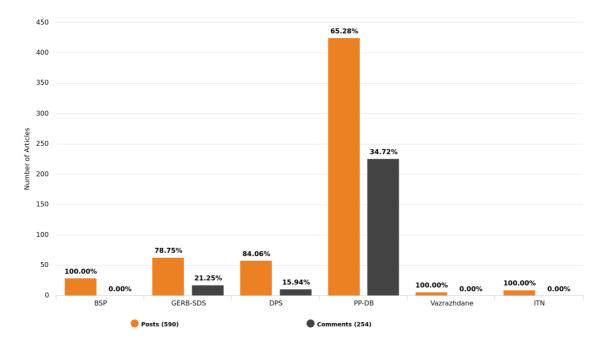
6.2.2 Overview of the four keyword sets



Among the analyzed keywords, corruption emerged as the most frequently mentioned, with anticorruption, the corruption-associated keywords and integrity following next. This trend was mirrored in online media, though the direct usage of corruption was notably higher on Facebook.

There were three spikes in the discussion of corruption: when BIRD's Facebook page highlighted <u>BOEC</u> alerting the Prosecutor's office about the case; when an article by <u>Deutsche Welle</u>, revealing "corruption services," was shared by BIRD; and when news broke that the Prosecutor's office would delve into the property transactions. For their part, the anticorruption efforts saw a significant increase in attention following the Prosecutor's office's decision to direct the Commission for Anticorruption and Illegal Assets Forfeiture to scrutinize the properties associated with Former Finance Minister Asen Vasilev and MP Daniel Lorer (<u>DARIK</u>).

The discussions around integrity were sparked by a pointed critique from GERB-SDS's MP Delyan Dobrev, who characterized the PP-DB coalition in terms of integrity. This critique, along with the full post, found a secondary platform in the comments section of the <u>Deutsche Welle</u> article.



6.2.3 Social coverage of the political parties

 Table 47:
 The chart illustrates the Facebook engagement with the narrative, broken down by political parties and type of activity: posts and comments.

The most frequently mentioned political party was PP-DB, which was present in a big number of comments as well. The primary source of the original posts were news websites, sharing their content on Facebook. BIRD's Facebook page stood out for both its active engagement and the number of PP-DB-related comments it received.

GERB-SDS emerged as the second most mentioned political entity, with many mentions coming from regional Facebook pages that highlighted leader Boyko Borisov's commentary on the unbalanced media attention compared to past controversies (Bulgaria ON Air).

DPS was the third most mentioned, particularly when Delyan Peevski, the head of DPS's parliamentary group, voiced support for Former Finance Minister Asen Vasilev and PP-DB MP Daniel Lorer (<u>Dnevnik</u>).

BSP was fourth, primarily in relation to a statement by Boyko Borisov, which started with the following words: "GERB was created to remove BSP from power" (Bulgaria ON Air).

ITN ranked fifth, highlighted when their parliamentary group's chair raised concerns regarding Vasilev's case.

Vazrazhdane received the lowest number of mentions, often appearing in posts summarizing the daily news.

6.2.4 Top 10 social authors

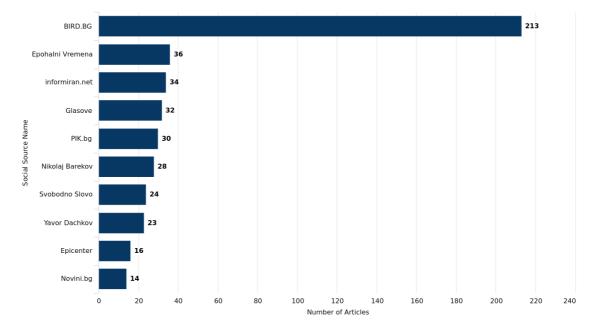


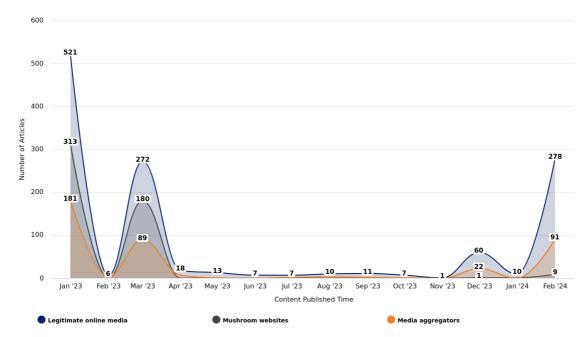
Table 48:The chart displays the top 10 social authors who posted on or received comments related to thenarrative during the monitored period.

Most of the top 10 social media authors were Facebook pages associated with reputable news websites. BIRD, the initial source of the story, stood out. This was due to its proactive approach—not only did the page share its own articles related to the case, but it also strategically reposted older articles as comments under new posts to offer additional context. Moreover, nearly half of all comments related to the narrative were concentrated under BIRD's posts. It is also worth noting that two individuals, Yavor Dachkov, founder of the legitimate media website Glasove, and Nikolay Barekov, who exclusively shared articles from the media outlet <u>Bnews</u>, played a role in amplifying the narrative.

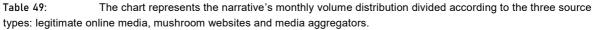
7 Corruption at the Kapitan Andreevo border facilities

The Bulgarian government took over the so called "Zlaten gyol" (Golden Puddle), consisting of disinfection facilities, phytosanitary and health control facilities, parking and a casino, at the Kapitan Andreevo border checkpoint, transitioning from a private firm to a state-owned entity after the private firm's contract expired in March (BNT). This strategic move was part of a broader effort to enhance national security and border control, marking a departure from the previous decade's practice of outsourcing critical border services to private companies (24Plovdiv). Additionally, the government initiated the establishment of a state laboratory at the border to facilitate faster food safety inspections, addressing the delays caused by transporting samples to Sofia for testing (BTA). In response to an improved epizootic situation in Turkey, disinfection services at the border checkpoints were temporarily halted, demonstrating Bulgaria's adaptive approach to border biosecurity risks. Moreover, the inauguration of a state laboratory for pesticide analysis at Kapitan Andreevo, funded by the state budget, aimed to expedite inspections and improve the flow of goods through one of Europe's key entry points, ensuring compliance with EU standards (BTA).

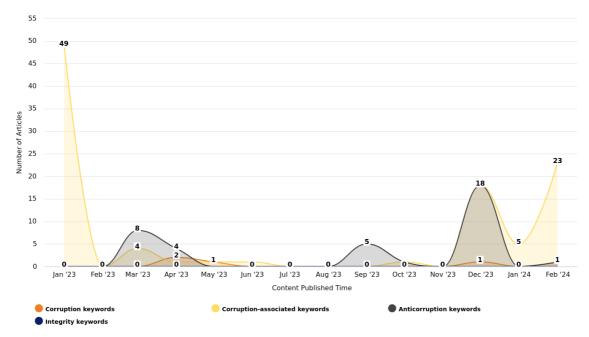
7.1 Deep-dive analysis of the online content



7.1.1 Overview of the narrative coverage segmented by source types



The legitimate online media outlets and aggregators had matching peaks: In January 2023, when the interim government terminated the contract with the company managing the so-called "Golden Puddle" (NOVA); in March 2023, when Interim Minister of Interior Ivan Demerzhiev took actions to seize the facilities at the Kapitan Andreevo border crossing that were not being used in accordance with the law (DIR.bg); and in February 2024, when a state-owned laboratory for pesticide testing opened at the border crossing (BNT). Notably, mushroom websites had only two distinct peaks: in January and March 2023. The January peak for mushroom websites was due to two headlines related to the activities of Interim Minister of Agriculture and Food Yavor Gechev and Interim Minister of Interior Ivan Demerzhiev. These headlines, originally appearing on the legitimate media outlet Petel, were spread by the mushroom websites (Petel, Petel). In March 2023, the legitimate media outlet Novini.bg published an article related to a statement by Interim Minister Demerzhiev about the restricted access to the border laboratory for employees linked to the seized facilities. Minutes later, Petel published an article with the same headline and one additional sentence. This version was exclusively republished by mushroom websites.



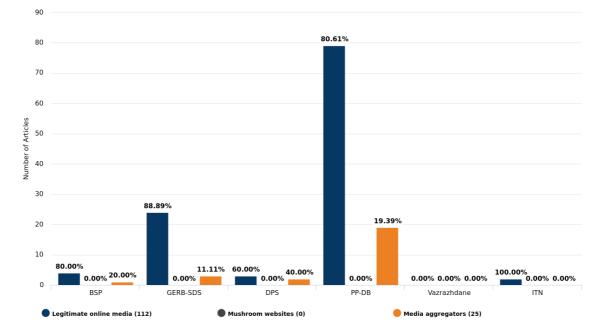
7.1.2 Overview of the four keyword sets



The corruption-associated keywords were the most frequently used in the context of the narrative, with the anticorruption ones coming in second. The corruption set saw minimal use, while integrity remained absent throughout the monitored period.

The usage of corruption-associated keywords peaked in January and December 2023, as well as in February 2024. The peaks in 2023 were caused by two events: remarks by the Interim Minister of Agriculture and Food, who spoke regarding an inspection carried out at the "Golden Puddle" (Ministry of Agriculture and Food) and the Supreme Administrative Court's annulment of the Bulgarian Food Safety Agency's August 2022 order for state-run facilities (DARIK). The February 2024 surge in content occurred when PP-DB co-chair Kiril Petkov presented information related to Eurolab to the Prosecutor's Office (Ruse24).

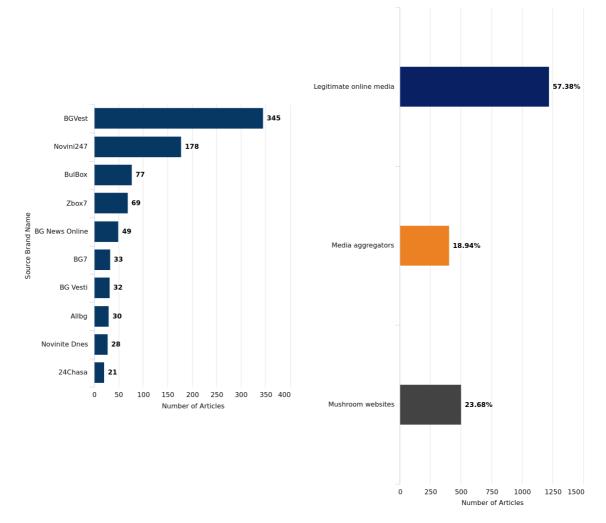
The spikes in content related to anticorruption were almost exclusively caused by the activity of the Anticorruption Fund Foundation, with the biggest one being in December 2023 when the Fund raised alarms that the Supreme Administrative Court's decision in favor of a private company was contrary to European legislation (<u>ACF</u>).



7.1.3 Overview of political parties mentions per source type

Table 51: The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

In the context of the narrative, PP-DB received the highest coverage, while GERB-SDS came in second. BSP and DPS were mentioned an equal number of times, ranking just behind GERB-SDS. ITN was the least mentioned political party, and Vazrazhdane did not receive any coverage. Interestingly, no political parties were mentioned by the mushroom websites. The PP-DB mentions were related to statements made by the party MP Ivan Hristanov (BNR) in January 2023. He revealed that it had become evident that the Bulgarian Food Safety Agency (BFSA) was unable to appeal a court decision regarding Eurolab's rented facilities due to a missed fee payment (BNR). Furthermore, in February 2024, the party's co-chair Kiril Petkov brought this matter to the attention of the Prosecutor's Office (Mediapool). GERB-SDS was mentioned in two BIRD (Bureau for Investigative Reporting and Data) articles. The first (BIRD) suggested connections between the laboratory at the Kapitan Andreevo border, GERB and BFSA, while the second (BIRD) alleged that GERB had attempted to allow a private company to operate the laboratory by amending the law. DPS was brought into focus in the context of ex-party member and Former Minister of Agriculture Mehmed Dikme, who stated that the "Golden Puddle" had existed for over 25 years and was handed over during GERB's government (Dnes). Moreover, BSP was featured only in daily news recaps, which included the narrative. For its part, ITN appeared in pieces about parliamentary group chair Toshko Yordanov, who suggested that the amendments allowing only government laboratories to carry out the control of food imports in the EU should come into effect after BFSA has developed the necessary infrastructure (Dnevnik).

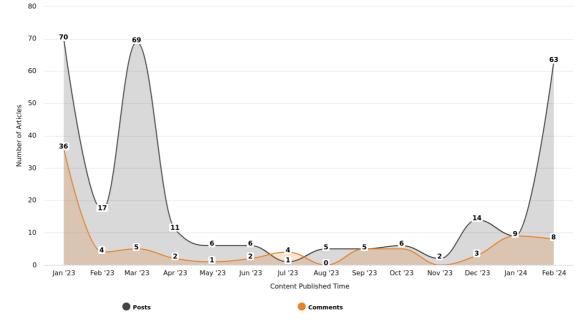


7.1.4 Overview of the top online sources and source type distribution

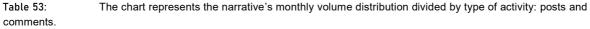
Table 52:The charts display the top 10 sources that commented on the narrative and the volume distributionper source type: legitimate online media, mushroom websites and media aggregators.

Although mushroom websites published approximately a fifth of the overall content, they were disproportionately represented among the top 10 sources, with BGVest in the first place. The fourth-, sixth- and seventh-ranked sites (Zbox7, BG7, Allbg) were mushroom websites as well. Individual media aggregator websites, such as Novini247, Bulbox, BG News Online and Novinite Dnes, were also disproportionately represented in the top 10, primarily due to their practice of republishing articles from multiple legitimate media outlets. Only two legitimate online media outlets made it into the chart: BGVesti.NET and 24Chasa. Notably, legitimate online media accounted for more than half of the total coverage related to the narrative.

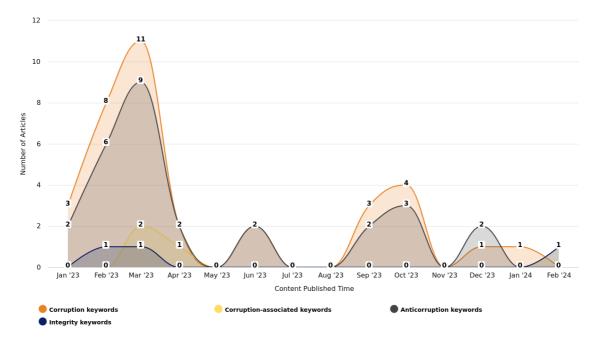
7.2 Deep-dive analysis of Facebook coverage



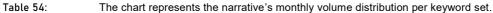
7.2.1 Overview of volume distribution of original posts and comments



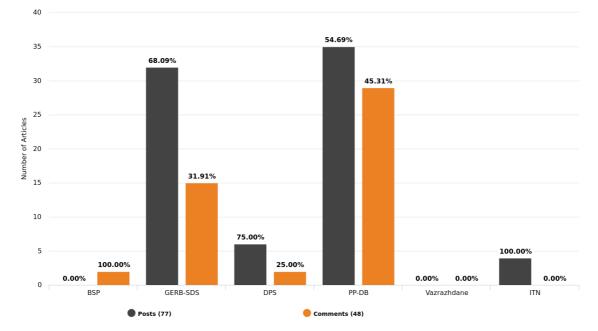
The peaks of the Facebook publications matched those in the online content, occurring in January and March 2023, as well as in February 2024. This was due to some media outlets sharing their own articles on their official Facebook pages. In January 2023, more than two-thirds of the comments consisted of an identical reply posted in the comment sections of multiple media outlets' Facebook pages. This comment, originating from a now-deleted account, cynically targeted GERB-SDS leader Boyko Borisov. It sarcastically suggested that Bulgarians should express gratitude to him, insinuating that under his leadership, Bulgarian children would be exposed to pesticideladen food. Excluding the spike of comments caused by this repetitive statement in January 2023, no other distinct pattern was observed.



7.2.2 Overview of the four keyword sets



The most mentioned sets in the context of the narrative were the corruption and anticorruption one, followed by corruption-associated words and integrity. Notably, corruption was mentioned more frequently than the corruption-associated keywords, marking a stark contrast with the online content. Comments mentioning corruption varied: some accused BFSA of being corrupt, while others suggested that a lack of control allows workers to benefit from corruption. BIRD's Facebook page was responsible for around four-fifths of the anticorruption mentions. It was particularly active in February and March 2023, showing significant interest in the narrative, with some posts suggesting that GERB and ITN lobbied in favour of the private companies who ran the facilities at the border during a hearing by the anticorruption parliamentary commission. The comments related to integrity questioned the integrity of a judge ruling on the laboratory case at the Kapitan Andreevo border.



7.2.3 Social coverage of the political parties

Table 55:The chart illustrates the Facebook engagement with the narrative, broken down by political partiesand type of activity: posts and comments.

Out of the six monitored political entities, PP-DB was the most mentioned on Facebook, followed by GERB-SDS, DPS, ITN and BSP, while Vazrazhdane did not receive any mentions in the context of the narrative.

Mentions of PP-DB were included in the repetitive comment from January 2023, which also said that PP-DB had notified the State Agency for National Security about the BFSA's possible criminal negligence. This comment also suggested that there was a broad coalition consisting of GERB, DPS and BSP.

More than half of all GERB-SDS mentions were in posts by BIRD that suggested that the party was involved in the "Golden Puddle" issue. Similarly, DPS was mentioned in BIRD publications related to Judge Vanina Koleva, who was involved in the Kapitan Andreevo's laboratory case, and was linked to a controversy involving undeclared property amid media pressure, with posts connecting DPS MP Delyan Peevski to the laboratory at the border.

ITN was exclusively mentioned in BIRD posts alleging that ITN had lobbied in favor of private companies managing the laboratory at the Kapitan Andreevo border.

7.2.4 Top 10 social authors

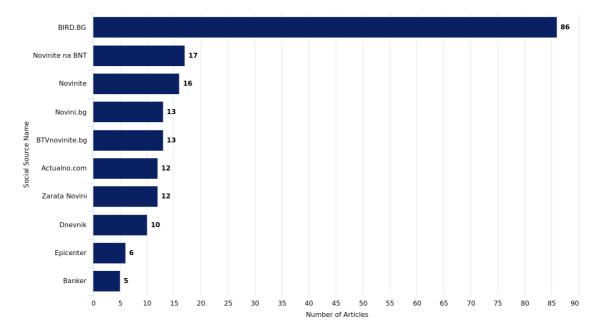


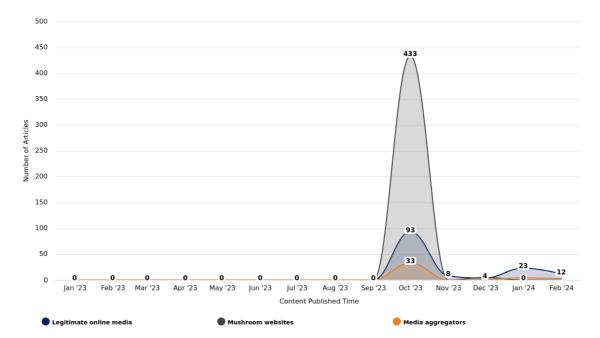
Table 56:The chart displays the top 10 social authors who posted on or received comments related to thenarrative during the monitored period.

Among the top 10 social authors, BIRD's page stood out, as it published around a fifth of all posts and comments, displaying significant interest in the narrative. A fourth of the content on BIRD's page consisted of comments, while the remainder was constituted of posts. Interestingly, the content from this page did not peak at the same times as that of online media, with the page being extremely active mainly during February and March 2023 and relatively inactive during the rest of the covered period. The other pages that made it into the top 10 were those of online media outlets sharing their articles on the topic.

8 Bulgaria's grey-listing by the Financial Action Task Force (FATF)

The Financial Action Task Force (FATF) added Bulgaria to its grey list in October 2023, making it the third EU member state subjected to such scrutiny, alongside Croatia. The decision came as a result of concerns raised by the FATF regarding Bulgaria's legal framework and implementation of anti-money laundering and counter-terrorist financing measures. Being grey-listed means that Bulgaria will undergo increased scrutiny and monitoring by the international community, potentially impacting its financial sector and international transactions (VIXIO). This move highlights the importance of robust regulatory frameworks and effective enforcement mechanisms in combating financial crimes. Bulgaria now faces the challenge of swiftly addressing the deficiencies outlined by the FATF to regain its status and reputation in the global financial system. This will require comprehensive reforms and cooperation with international partners to strengthen its anti-money laundering regime and restore confidence among stakeholders.





8.1.1 Overview of the narrative coverage segmented by source types

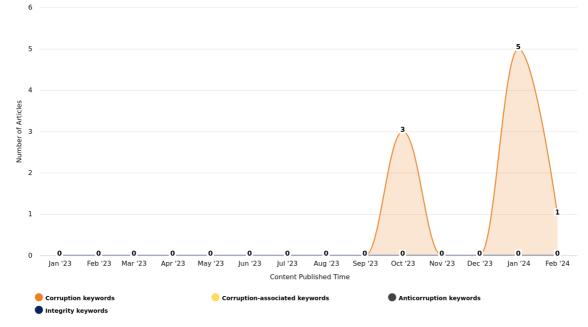
Table 57:The chart represents the narrative's monthly volume distribution divided according to the three sourcetypes: legitimate online media, mushroom websites and media aggregators.

The media's response to Bulgaria's FATF grey-listing showcases distinct behaviors across the various types of sources. The legitimate online media's spike in October reflects its timely and substantial coverage of the event. However, interest visibly declined afterwards, as the story aged and the news cycle moved on.

On the other hand, mushroom websites published 433 articles in October, with many of them echoing a single headline from <u>Blitz</u>. This indicates a clickbait-driven approach rather than original reporting. The content from these sites likely capitalized on the sensational aspects of the grey-listing rather than on providing detailed analysis or ongoing coverage, as evidenced by the significant drop to zero articles immediately after.

For their part, media aggregators, which typically curate content from other outlets, maintained a consistent but modest level of coverage.

As a conclusion, the media ecosystem demonstrated an intense immediate reaction to the narrative, however, its engagement with the nuances was rather limited.



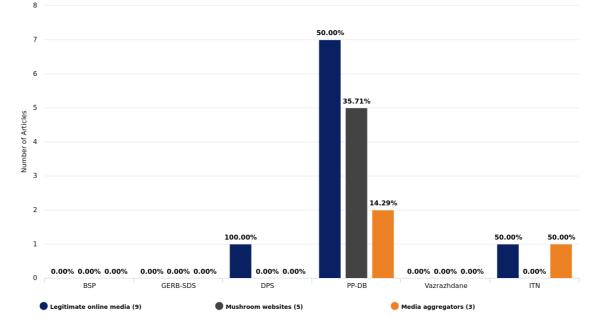
8.1.2 Overview of the four keyword sets



The above chart about the media coverage concerning Bulgaria's FATF grey-listing highlights a notable trend: the relative absence of certain keywords in the narrative. Despite the overall volume, the anticorruption, integrity and corruption-associated keyword sets were not featured in the context of the narrative. Instead, the media's sole focus was on corruption, which was still mentioned only a few times.

In October 2023, an article by <u>Manager</u> magazine pointed out Bulgaria's need to address issues related to corruption in line with FATF's standards. This article contributed to the number of corruption mentions that month. Similarly, in January 2024, <u>Mediapool</u> published an article with the word "corruption" in the headline, which was then echoed by other media outlets such as <u>Haskovo.net</u>.

The data reveals a narrow focus on the theme of corruption. There is a conspicuous lack of engagement with terms that imply proactive measures or positive reforms, such as anticorruption and integrity. This suggests that the narrative is skewed toward Bulgaria's challenges with corruption rather than toward its efforts or commitments to improve. The media's choice to primarily mention corruption when discussing the grey-listing could potentially reflect and reinforce a negative perception.

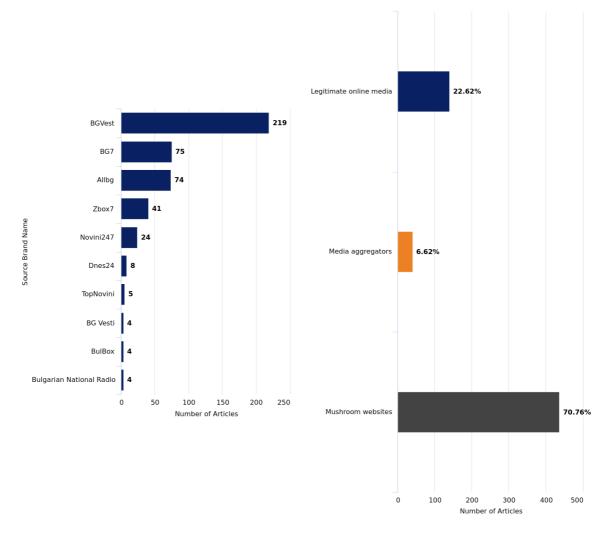


8.1.3 Overview of political parties mentions per source type

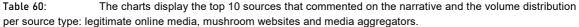
 Table 59:
 The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

In analyzing the mentions of Bulgarian political parties in the context of the FATF greylisting, it is apparent that the media coverage was quite selective and limited. The political parties BSP, GERB-SDS and Vazrazhdane were not mentioned at all across the three types of media sources. This absence could indicate that these parties were not actively involved in the discourse surrounding the grey-listing and that the media did not find their positions or statements noteworthy within this context. DPS was only mentioned in a single article by Kingofnet.net, which criticized the governance strategy, including the alliance with controversial figures, such as Delyan Peevski, pointing out the FATF grey-listing as an example of the consequences of poor policy decisions. PP-DB received the most mentions, primarily due to a statement by the former Chief Prosecutor Ivan Geshev. This statement was also disseminated by mushroom websites (republishing a piece by PIK). Geshev's comment connected the FATF decision to what he termed as a "national betrayal" by individuals associated with PP-DB, specifically identifying Hristo Ivanov and Kiril Petkov. This implication portrayed it as a setback for Bulgaria's aspirations, including the country's desire to join the Schengen Area. ITN's mention came through an article in <u>19min</u> (republished by the aggregator <u>Novini 247</u>), which provided insights from the newly elected ITN municipal councilor and finance expert, Plamen Danailov, who explained the implications of the grey-listing for Bulgaria.

Overall, the mentions of political parties in the context of the grey-listing were sparse, which could suggest that political entities either did not extensively engage with this issue in their communications or that the media did not amplify their perspectives on it.



8.1.4 Overview of the top online sources and source type distribution



The data presents an imbalanced narrative across the different media types. The first chart shows mushroom websites (BGVest, BG7, Allbg, Zbox7) in the lead, with the top four outlets in this category publishing a significant number of articles, demonstrating an eagerness to cover the news, perhaps due to its sensational nature and the traffic it could generate. Media aggregators, such as Novini 247 and Bulbox only republished a modest number of articles without contributing extensively to the discourse. The legitimate online media outlets, accounting for about 23% of the total coverage, appeared to be more selective. The lower number of articles from the Bulgarian National Radio and Economedia (Dnevnik and Capital) possibly reflects a more measured approach to the coverage, one that focuses on in-depth analysis and verified information. These trends showcase the varied priorities and roles of the different media types in shaping the public discourse around significant events.

8.2 Deep-dive analysis of Facebook coverage

35 30 25 Number of Articles 20 15 10 10 5 0 0 0 0 0 0 0 0 0 Jan '23 Feb '23 Mar '23 Apr '23 May '23 Jun '23 Jul '23 Aug '23 Sep '23 Oct '23 Nov '23 Dec '23 Jan '24 Feb '24 Content Published Time Posts 🛑 ca

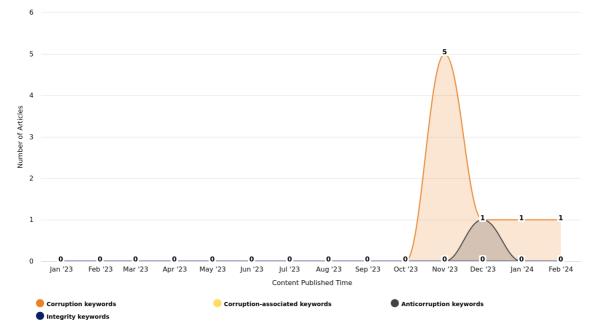
8.2.1 Overview of volume distribution of original posts and comments

The narrative's Facebook content volume is noticeably lower than that in online media, suggesting that while the grey-listing was a point of discussion, it did not generate the same level of intensity on social media as seen in online media platforms.

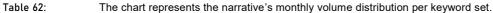
The peak in October represents the immediate reactions to the grey-listing news. Original posts dominated the conversation, while the relatively low number of user comments showed that people were engaging with it to a lesser extent.

The uptick in activity in January 2024 could be attributed to posts that appeared on the official pages of legitimate media outlets. They featured expert commentary from economists and political figures like Sergey Stanishev, discussing the implications of the grey-listing for Bulgaria's ambitions to join the Eurozone. This resurgence of interest indicates that significant financial and economic discussions can often impact the discourse at a later date, particularly when linked to the country's economic future.

Table 61: The chart represents the narrative's monthly volume distribution divided by type of activity: posts and comments.



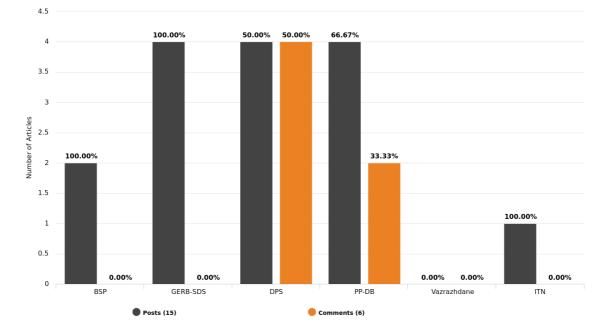
8.2.2 Overview of the four keyword sets



The chart reveals the limited scope of the selected keywords. The term "corruption" was notably used by BIRD's official account, which attributed Bulgaria's relegation to the FATF's grey area to the legitimization of Delyan Peevski, tying this to a broader policy issue. The post resonated with users, as evidenced by its replication in comments across political discussions on Facebook.

The anticorruption keyword set appeared only once in a post from the Association of European Journalists Bulgaria, spotlighting an event focused on utilizing FATF processes in civil society and investigative journalism against corruption.

The absence of integrity and corruption-associated keyword sets in the conversation could suggest that the narrative on Facebook was centered on direct instances of corruption rather than broader systemic or preventative aspects.



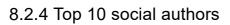
8.2.3 Social coverage of the political parties

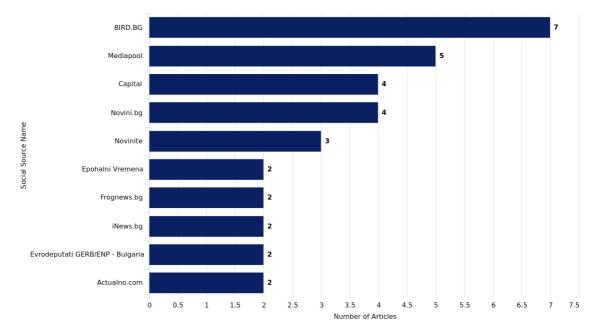
Table 63:The chart illustrates the Facebook engagement with the narrative, broken down by political partiesand type of activity: posts and comments.

The Facebook discussions regarding Bulgaria's FATF grey-listing highlight limited but pointed mentions of political parties.

BSP and its leader's posts criticized the previous government for Bulgaria's inclusion on the FATF list. They directly opposed the idea of any political coalition with PP-DB and GERB at the municipal level in Sofia. This suggests a charged political atmosphere where blame was assigned and alliances were clearly defined. GERB, looped into this criticism by association with PP-DB in BSP's statements, was positioned defensively, with no direct engagement or countering posts observed. Meanwhile, the mentions of DPS, linked to the controversial figure of MP Delyan Peevski in BIRD's analysis, tied the party to the grey-listing, implying a substantial political influence over Bulgaria's financial standing. PP-DB, targeted by both BSP and ITN's criticisms, was held accountable for the FATF decision by these parties. ITN's sole mention is connected to this criticism, with a statement from an ITN MP Toshko Yordanov reinforcing the accusatory tone. Vazrazhdane's absence from the conversations may reflect the party's perceived non-involvement or lack of vocal stance on the issue.

Overall, the Facebook mentions paint a discourse of blame and political responsibility, with parties either defending their position or criticizing others. The sparse activity, however, indicates these discussions were not widely debated or engaged with by the Facebook community.





The chart displays the top 10 social authors who posted on or received comments related to the narrative during the monitored period.

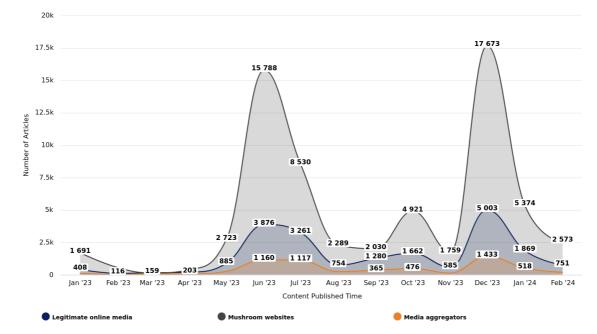
The chart highlights BIRD's page as the most active. Its posts addressed the country's economic challenges and the repercussions of being placed on the FATF grey list. BIRD's content also suggests that the presence of sanctioned individuals in governance has direct negative implications for Bulgaria's financial transactions and reputation.

Other active Facebook pages were those of legitimate media outlets, such as Mediapool and Capital, among others. These pages provided news updates and played a key role in informing the public about the grey-listing and its effects.

9 Constitutional reforms

Throughout 2023, the Bulgarian political landscape was actively engaged in constitutional reforms, predominantly steered by the coalition government of PP-DB and GERB, along with the support of DPS (NOVA). The year was marked by intense legislative activities aiming to reshape the judicial system, curtail the powers of the chief prosecutor, and reduce the presidential influence. Amidst political discord, the proposed amendments sparked a wide array of reactions from various political factions, with BSP, Vazrazhdane and ITN vocal in their opposition (Radio Free Europe). By December, the proposed changes had crystallized into a concrete legislative text, moving through the necessary parliamentary readings thanks to the coalition's majority. The approved reforms included allowing dual citizenship for MPs and ministers, splitting the High Judicial Council into two and revising the criteria for appointing an interim prime minister (BTA). In early 2024, President Rumen Radev challenged the reforms, questioning the procedural validity of their adoption and calling for constitutional scrutiny (BNR). This highlighted the ongoing tensions between the executive branch and the President's office, bringing to the forefront the intricate balance of power within the Bulgarian government.

9.1 Deep-dive analysis of the online content



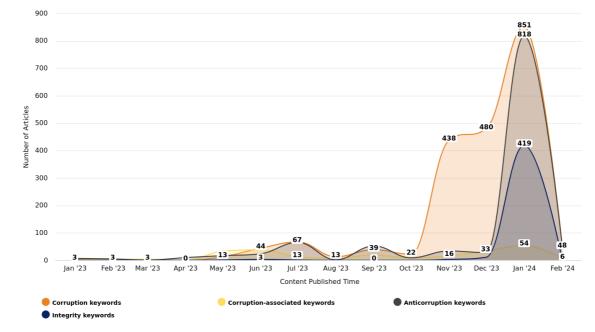
9.1.1 Overview of the narrative coverage segmented by source types

 Table 64:
 The chart represents the narrative's monthly volume distribution divided according to the three source types: legitimate online media, mushroom websites and media aggregators.

The mushroom websites dominated the narrative's media coverage, peaking in June and December. Meanwhile, legitimate media provided consistent, detailed reporting, which intensified during the December amendments. Media aggregators, though less active, persistently curated and disseminated reforms-related content.

The media coverage of Bulgaria's constitutional reforms showcases significant engagement, especially during key political milestones. In June, the substantial peak across all media types coincided with GERB-SDS, DPS and PP-DB aligning to form a majority for constitutional reforms. The spike signalled robust media interest and possibly widespread public discussions around the governance reshaping (BTV). During the same time, the mushroom websites disseminated a number of sensational headlines originally published by Blitz and Petel.

The December peak reflects the media focus on the Justice Minister's enactment of the constitutional amendments, an event marking a significant change in Bulgaria's legal landscape (<u>NOVA</u>). The mushroom websites focused on covering the political reaction to the reforms (<u>BGUtro</u>, <u>BG7</u>).

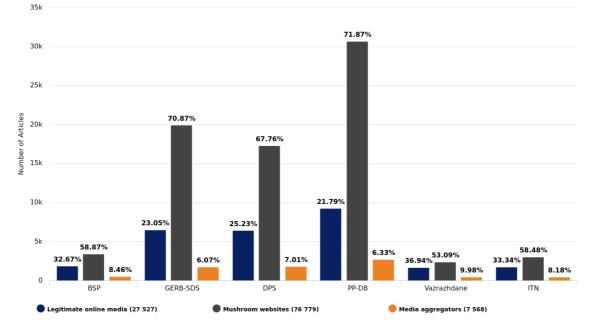


9.1.2 Overview of the four keyword sets

Table 65: The chart illustrates the narrative's overall volume distribution per month and per keyword set.

There was a significant content peak in January 2024. The surge, particularly from mushroom websites, corresponds to Da, Bulgaria!'s intent to back Maria Gabriel's potential cabinet, in the context of which the party leveraged the discussions on various reform priorities, which included anticorruption measures and judicial changes aligned with European standards (Blitz). The corruption and anticorruption keywords were frequently cited within the context of proposed legal and regulatory updates, which likely contributed to their mention in the news. The word integrity was mentioned in the context of ensuring the thorough application of new constitutional provisions regarding the selection of all regulators announced by the National Assembly.

The data also shows that the corruption-associated keywords were used less frequently compared to the other sets. This could indicate that the media was not so focused on the broader concept of corruption and the specific incidents or allegations typically associated with the term but preferred to use the word directly instead.



9.1.3 Overview of political parties mentions per source type

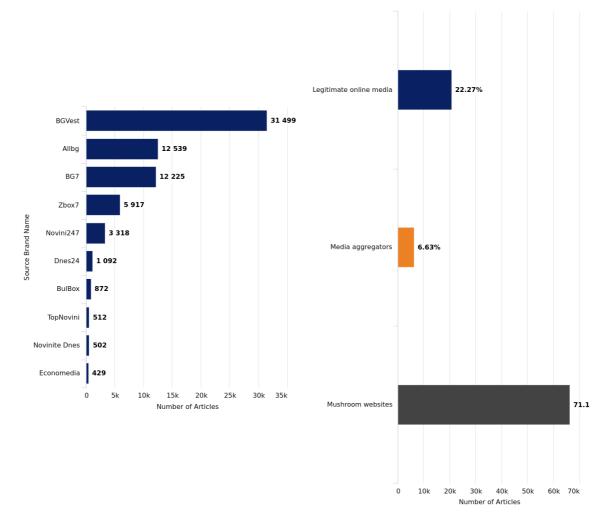
 Table 66:
 The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

PP-DB emerged as the most mentioned party across all types of sources, hinting at public interest in its actions and stance on the reforms (<u>Radio Free Europe</u>). GERB-SDS followed, with mushroom websites particularly focusing on it, which may reflect strategic communication efforts or heightened public scrutiny (<u>Blitz</u>).

DPS, notably active in the reform committee through members like Delyan Peevski, had a strong presence in the media coverage, which indicates the party's significant influence and the public's interest in its legislative initiatives (<u>NOVA</u>). BSP, while having a lower overall number of mentions (<u>Actualno</u>), still saw considerable attention from mushroom websites.

Vazrazhdane and ITN received fewer mentions. However, their perspectives were subject to more in-depth analysis, especially in legitimate media. In December 2023, the two parties voiced their opposition to the constitutional changes by walking out of a parliamentary session, an act of protest that drew media attention to their firm stance against the reforms (<u>Dir</u>).

The data reveals that while mushroom websites produced the bulk of the content, it was the legitimate media that focused its coverage on pivotal political actions, like the ITN and Vazrazhdane's protest.

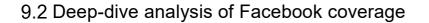


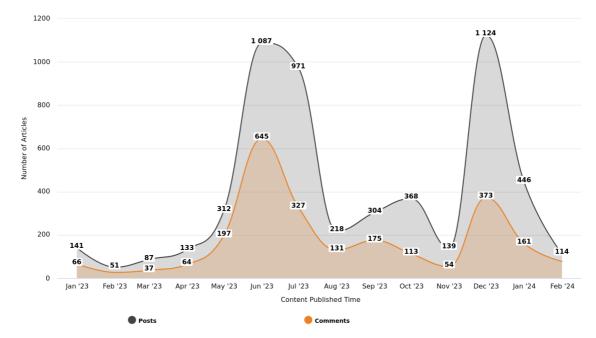
9.1.4 Overview of the top online sources and source type distribution

 Table 67:
 The charts display the top 10 sources that commented on the narrative and the volume distribution

 per source type: legitimate online media, mushroom websites and media aggregators.

The charts spotlight the dominant role of mushroom websites, with outlets like BGVest and Allbg leading in the number of articles published. This suggests a significant volume of content from sources that may not adhere to traditional journalistic standards, potentially affecting public perception through the sheer amount of coverage they provide. Aggregators such as Novini247, BulBox and Novinite Dnes also feature prominently, which underscores their role in disseminating the news. Among the top 10 most active sources, Economedia, known for its business-focused outlets Capital and Dnevnik, stood out as the sole representative of the legitimate media sources. Its position indicates the influence of serious journalism in the context of the narrative.



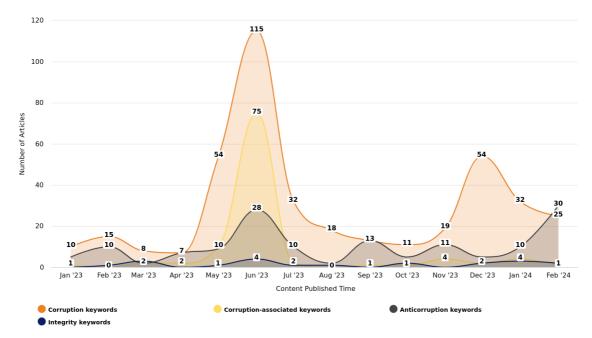


9.2.1 Overview of volume distribution of original posts and comments

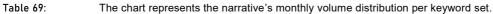
Table 68:The chart represents the narrative's monthly volume distribution divided by type of activity: posts and
comments.

The Facebook activity related to the narrative peaked in June and December, correlating with key legislative developments. In June, the alignment of GERB-SDS, DPS and PP-DB to form a majority for constitutional reforms sparked an increase in the content, evidenced by a surge in the original posts which outnumbered the comments — a reversal of the typical trend on the platform. The same trend was observed in December, during the final vote on the constitutional changes, with original posts dominating the conversation.

The predominance of original posts on Facebook regarding Bulgaria's constitutional reforms, particularly from the accounts of media outlets, suggests an effort to inform and shape public opinion during key legislative moments. The relatively lower number of comments may indicate that the audience was more receptive to consuming the content rather than engaging in back-and-forth discussions. This trend highlights the crucial role media organizations play on social platforms, not just as news providers but as central hubs for public discourse, where they curate a narrative and frame the public conversation around significant political events.



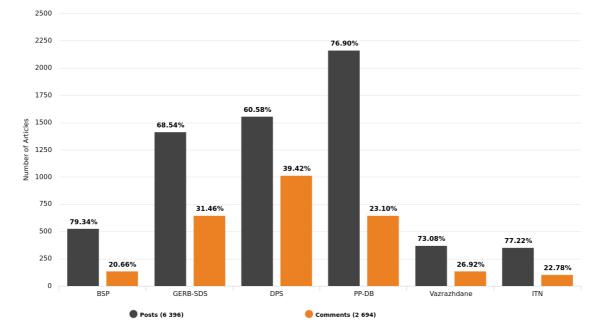
9.2.2 Overview of the four keyword sets



The content distribution segmented by the four keyword sets echoed the events noted in online media, with peaks in June and December. The discourse on the platform was marked by frequent mentions of corruption keywords, as users often engaged with the narrative by labelling political figures as corrupt.

Interestingly, the corruption-associated keywords were less prominent, hinting that the conversation was more focused on corruption as a specific concept rather than on the activities related to it. The anticorruption keywords saw a notable increase during key legislative developments, reflecting the public's demand or support for systemic changes aimed at combating corruption.

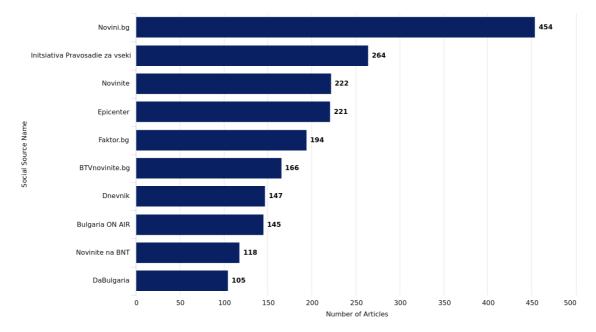
The integrity keywords had fewer mentions, yet they peaked during critical moments, highlighting instances in which political integrity was questioned or emphasized in the context of the proposed reforms.



9.2.3 Social coverage of the political parties

 Table 70:
 The chart illustrates the Facebook engagement with the narrative, broken down by political parties and type of activity: posts and comments.

The Facebook data reveals that PP-DB, DPS and GERB-SD were the most mentioned parties, which aligns with their active involvement in the reforms process. PP-DB's dominant presence suggests that its positions might have resonated strongly, prompting widespread content sharing and discussion through original posts. The party's proposal for constitutional reforms, which was presented in July 2023, resulted in a peak of content on the social platform. The most discussed event related to DPS, which was mentioned in a hugh number of both posts and comments, was its MP Delyan Peevski's joining the Committee on Constitutional Affairs. GERB-SDS also saw considerable mentions, likely due to the party's prominence in the political manoeuvring that shaped the reforms debate. On the other hand, BSP, Vazrazhdane and ITN were mentioned less overall. Despite this, they had their share of visibility, primarily through posts rather than comments.



9.2.4 Top 10 social authors

 Table 71:
 The chart displays the top 10 social authors who posted on or received comments related to the narrative during the monitored period.

The chart shows a significant presence of media outlets' Facebook pages, reflecting their role as the primary information providers on the subject. Notably, the page Initsiativa Pravosadie za Vseki [Justice for All Initiative] stood out, indicating the substantial public engagement with its mission to advocate for judicial reform, independent courts and effective justice as crucial for societal and economic prosperity. The Initiative's apolitical stance and focus on societal interests resonated on the platform, echoing calls for deep judicial reform as a means to combat corruption and align Bulgaria more closely with the European standards.

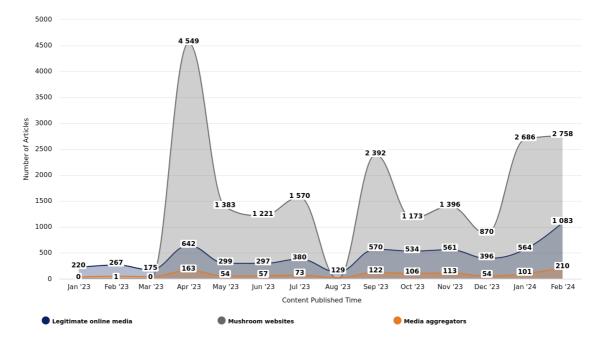
DaBulgaria, representing the political party Da, Bulgaria! (part of the PP-DB political formation), was also among the top authors. Its activity suggests a strategic use of Facebook (social media) to disseminate political messages, engage with citizens and rally support for constitutional reform proposals.

The engagement levels reflect a diverse landscape where both media voices and dedicated reform advocacy groups actively shape the discourse on Bulgaria's constitutional reforms. This suggests a rich ecosystem where various actors, including political entities such as Da, Bulgaria!, contribute to a robust debate and information exchange.

10 Bulgaria's membership in the Organization for Economic Co-operation and Development (OECD)

On January 25, 2022, the OECD Council opted to commence accession talks with Bulgaria. This decision came after thorough consideration by OECD Members, who evaluated Bulgaria's progress and adherence to the evidence-based Framework for Consideration of Prospective Members since the country's initial request for OECD membership. However, according to a 2023 study by Transparency International cited in various media outlets (Economy.bg), the country had yet to overcome significant problems with the rule of law and oligarchic influence. Despite the presence of legislative reform programmes by several consecutive governments, parliamentary legislative activity was characterized by two contradictory features: the high intensity of the legislative changes and the low quality of the adopted laws. Therefore, the introduction of modern regulation and economic mechanisms to combat bribery in the private sector and the implementation of good governance standards were found to be lagging behind, hindering the efforts towards OECD membership.

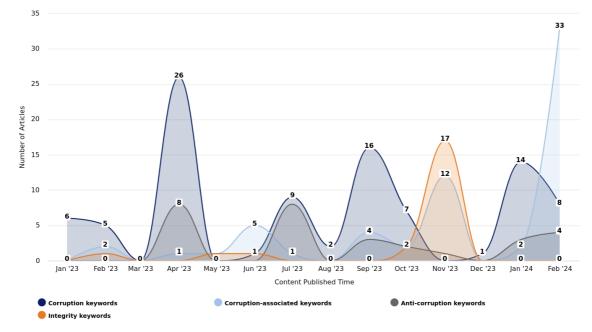




10.1.1 Overview of the narrative coverage segmented by source types

The online media coverage remained consistent throughout the entire period, with peaks during April 2023 and February 2024. In April 2023, legitimate media highlighted the visit of OECD Chairman Mathias Korman to Bulgaria. The outlets covered Bulgaria's potential for OECD membership, noting that the country had met a significant portion of the membership criteria, while also emphasizing the areas in need of improvement, including enhancing tax collection, reducing expenses and addressing corruption (News.bg). In 2024, various legitimate sources cited President Rumen Radev's comments regarding Bulgaria's aim for full membership in the OECD. He stressed the importance of the membership for Bulgaria's economic development and integration into the global economic processes. Radev also highlighted the need for Bulgaria to align its economic policies with the OECD standards and practices to facilitate the country's accession to the organization (Bulpress). For their part, the media aggregators' numbers showed a steady but more subdued interest in the topic (NetNews). In contrast, mushroom websites consistently republished articles, resulting in significant peaks, with pieces predominantly coming from Blitz, especially when mentioning President Rumen Radev. A notable part of the articles focused on the Bulgarian President and the Croatian Minister of Foreign Affairs Gordan Grlić-Radman, as they discussed Bulgaria and Croatia's strong partnership within the EU, NATO and the Three Seas Initiative, with a shared goal of an OECD membership (Blitz).

Table 72:
 The chart represents the narrative's monthly volume distribution divided according to the three source types: legitimate online media, mushroom websites and media aggregators.

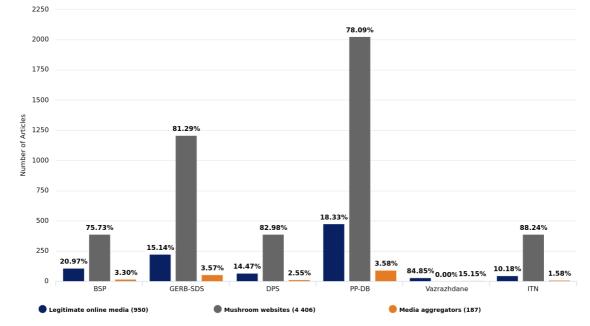


10.1.2 Overview of the four keyword sets



Throughout the observed period, media outlets predominantly used the term corruption, with a peak in April 2023, in the context of Former Caretaker Prime Minister Galab Donev's remarks, following the presentation of the Economic Review of Bulgaria report by the OECD. In his comment, Donev emphasized the need for implementing effective measures to tackle the various challenges, alongside Bulgaria's dedication to maintaining fiscal stability and combatting corruption (<u>24Chasa</u>).

The term integrity was referenced by numerous credible outlets in connection with the Ministry of Justice's proposal for transparent and integrity-driven lobbying to ensure fair representation of diverse interests. The proposal entailed the publishing of an Opinion for Regulating Lobbying Activities in Bulgaria (for public discussion), thus fulfilling commitments to the OECD and the National Recovery and Resilience Plan (BTA).



10.1.3 Overview of political parties mentions per source type

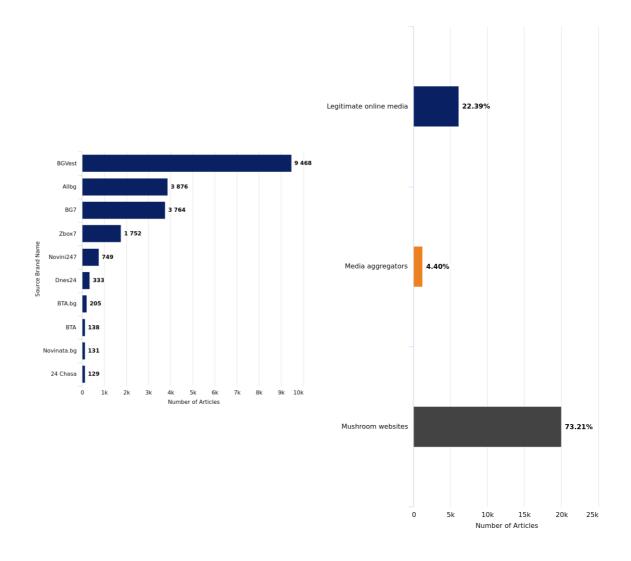
Table 74:The chart illustrates the volume distribution of the political parties within the narrative, broken down
by source type: legitimate online media, mushroom websites and media aggregators.

The various political parties received extensive coverage in the context of the narrative, particularly on mushroom websites, with a notable focus on PP-DB and GERB-SDS.

This coverage intensified in May 2023, coinciding with GERB members expressing concerns about the lack of concrete measures and solutions in PP-DB's management programme, especially regarding deficit reduction, inflation, OECD accession and tax legislation reforms, highlighting perceived shortcomings in the party's approach (<u>Allbg</u>).

Legitimate online media also contributed significantly to the coverage, consistently focusing on PP-DB. These outlets mentioned Asen Vasilev, the Former Finance Minister from PP, who emphasized the government's efforts to advance the country's implementation of reforms in the judiciary and economic sectors, as well as Bulgaria's aim to achieve OECD membership by 2025, signaling its commitment to European integration (<u>Cross</u>).

Media aggregators, while less active, still played a role once again bringing attention to the PP-DB party. The most noticeable peak occurred in April 2023, due to Former Caretaker Minister Galab Donev's remarks on Bulgaria's commitment to fostering cooperation and dialogue with international organizations like the OECD, reflecting the country's dedication to advancing economic development and global integration (<u>Novini247</u>).

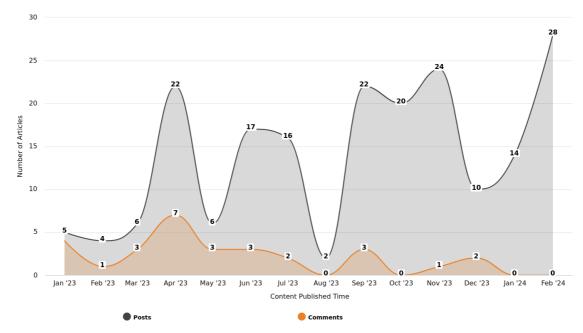


10.1.4 Overview of the top online sources and source type distribution

Table 75:The charts display the top 10 sources that commented on the narrative and the volume distributionper source type: legitimate online media, mushroom websites and media aggregators.

The mushroom websites clearly dominated in terms of article volume, with BGVest and Allbg in the lead, followed by aggregators like Novini247. For their part, the legitimate online sources can be found further down the list, with Dnes24 and 24Chasa being the most prominent. In general, legitimate online media expressed moderate interest in the OECD narrative.

10.2 Deep-dive analysis of Facebook coverage



10.2.1 Overview of volume distribution of original posts and comments

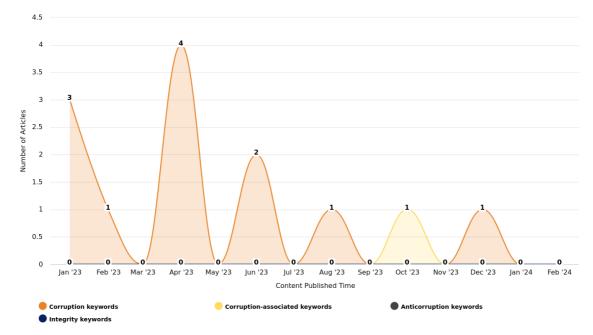
The Facebook posts outnumbered the comments, which indicates a passive response from the audience, possibly suggesting a lack of direct engagement.

Peaks in activity, particularly notable in April 2023, September through November 2023 and February 2024, correspond to some key events, such as the statement from OECD'Secretary-General Mathias Cormann, who, in April 2023, expressed his appreciation for the broad political support for Bulgaria's accession to the organization.

In September 2023, Maria Gabriel emphasized Bulgaria's pursuit of OECD membership in a post on her Facebook page, highlighting Chile's pledge of support to the country. The news quickly spread through various other news outlets Facebook posts.

In February 2024, there was a diverse range of posts with no specific trend noted. However, Former Prime Minister Nikolay Denkov's meeting with French President Emmanuel Macron to discuss Bulgaria's foreign policy priorities, particularly in regard to the OECD membership, garnered attention.

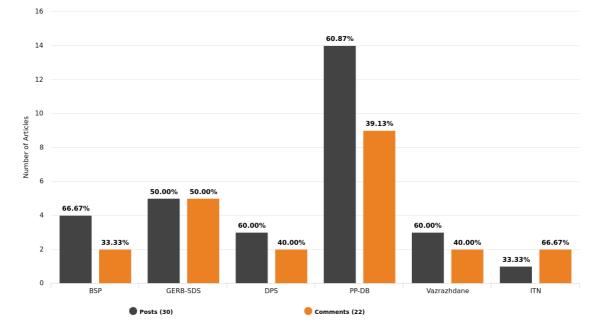
Table 76:The chart represents the narrative's monthly volume distribution divided by type of activity: posts and
comments.



10.2.2 Overview of the four keyword sets

 Table 77:
 The chart represents the narrative's monthly volume distribution per keyword set.

Due to the limited discussions on Facebook concerning Bulgaria's OECD membership, the related keyword sets were also not widely used and did not reveal any discernible patterns.

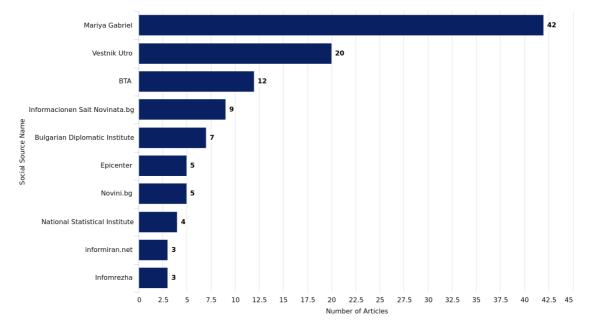


10.2.3 Social coverage of the political parties

Table 78:The chart illustrates the Facebook engagement with the narrative, broken down by political partiesand type of activity: posts and comments.

PP-DB was at the center of the conversation. GERB-SDS received the second highest number of engagements (with an equal number of mentions in posts and comments), while the other parties—BSP, DPS and Vazrazhdane—received minimal attention. ITN had the fewest mentions, suggesting a lesser involvement with the narrative.

PP-DB was repeatedly mentioned by the same user who posted identical critical messages under different posts. The comments mockingly referred to Hristo Ivanov as "Ristyo" and urged him to address concerns about complying with OECD requirements on fraudulent business practices. The commenter expressed doubt about Ivanov's capability to address these concerns, citing questionable funding from suspicious business structures. Additionally, they questioned whether prominent figures like Ivan Geshev would take meaningful action against such practices. The overall tone reflected cynicism about the political corruption in general.



10.2.4 Top 10 social authors

 Table 79:
 The chart displays the top 10 social authors who posted on or received comments related to the narrative during the monitored period.

The chart highlights the top ten social authors who contributed to the conversation about Bulgaria's OECD membership on Facebook. Maria Gabriel's page ranked first, likely due to her active involvement and her position as Deputy Prime Minister of Bulgaria and Minister of Foreign Affairs. Vestnik Utro followed as the second most prolific source, with about half the amount of content compared to Maria Gabriel's page. The Bulgarian News Agency (BTA) took third place, in line with its function as a key disseminator of information.

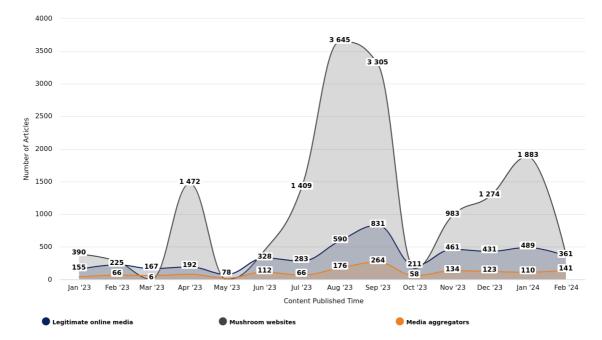
11 The adoption of the new Anticorruption Law and the reform of the Anticorruption Commission Act

In Bulgaria's continuous struggle against corruption, a new anticorruption commission emerged, representing a promising effort for an effective antigraft mechanism to be created. This latest attempt was met with both anticipation and scepticism due to the nation's history of anticorruption initiatives that failed to yield significant outcomes. The formation of the new commission, received with applause by MPs from diverse political factions, underscored its perceived importance in Bulgaria's broader goals, including the country's integration into the Schengen area.

Consisting of a small, specialized team with investigative authority, the new commission signalled a shift toward a more concentrated approach to tackling corruption. Its members, selected from experienced legal and economic professionals, were expected to bring expertise and decisiveness to the institution. However, the election process for these members — necessitating a substantial parliamentary majority — sparked debate and concern, hinting at the possibility of politicized selections, which could potentially influence the commission's autonomy and effectiveness (<u>BTA</u>).

The outcome of this new chapter in Bulgaria's anticorruption struggle will be measured by the commission's ability to operate beyond the influence of historical political entanglements and bring forth a reformed, transparent and accountable structure that leads to tangible anticorruption results (<u>Capital</u>).



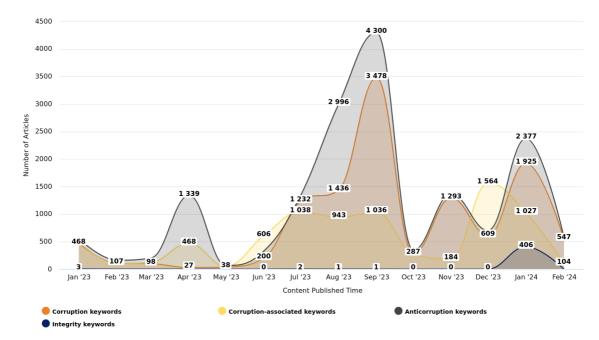


11.1.1 Overview of the narrative coverage segmented by source types

Table 80:The chart represents the narrative's monthly volume distribution divided according to the three sourcetypes: legitimate online media, mushroom websites and media aggregators.

The narrative's content distribution illustrates distinct patterns of engagement across the various media types. The legitimate online media sources (<u>NOVA</u>) and the aggregators (<u>Novini247</u>) reached a pronounced peak in September 2023, which corresponds with the parliamentary proceedings about the selection conditions for the Anticorruption Commission's members.

The mushroom websites recorded more distinct peaks throughout the year. In April 2023, they disseminated several headlines, such as the news published by <u>Petel</u> concerning the submission of the anticorruption law and several other bills to the National Assembly, indicating an interest in legislative developments. The spike in August 2023 was driven by interest in ITN leader Slavi Trifonov's asset declaration, a matter that garnered attention due to his high public profile (<u>Blitz</u>). January 2024 saw another content surge amid reports about figures being summoned for inquiries related to suspicious property transactions and corruption (<u>BG7</u> republishing <u>Blitz</u>). The mushroom websites also covered the negotiations between the political parties for around 70 key state positions, such as the members of the Anticorruption Commission and other vital legal and supervisory bodies (<u>BGUtro</u> republishing <u>Trud</u>). These patterns also reveal that while mushroom websites follow legislative and political developments, their coverage usually leans towards the more sensational aspects of the news.



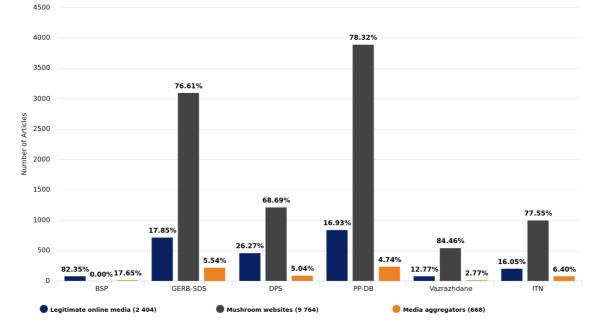
11.1.2 Overview of the four keyword sets

Table 81: The chart illustrates the narrative's overall volume distribution per month and per keyword set.

When discussing the mentions of corruption and anticorruption in the context of Bulgaria's new anticorruption law, it is important to note that these terms are intrinsic to the law's title and core subject. Hence, their high occurrence is expected and not particularly indicative of the media's focus or sentiment.

The sharp increase in the mentions of corruption-associated terms in December 2023 was significantly influenced by a high-profile arrest within the Sports Ministry, spotlighting the active role of the Anticorruption Commission (NOVA).

January 2024 saw a spike in the use of the term integrity, particularly in discussions about Da, Bulgaria! [part of the PP-DB coalition] and its resolution for the cabinet of Maria Gabriel. The emphasis was on establishing clear procedures open to civil society, ensuring integrity checks for regulatory appointments, and providing the Anticorruption Commission's staff with credible individuals (<u>Blitz</u>). Mushroom websites also picked up on this integrity theme, mirroring the discussions initiated by legitimate sources and contributing to its wider dissemination.

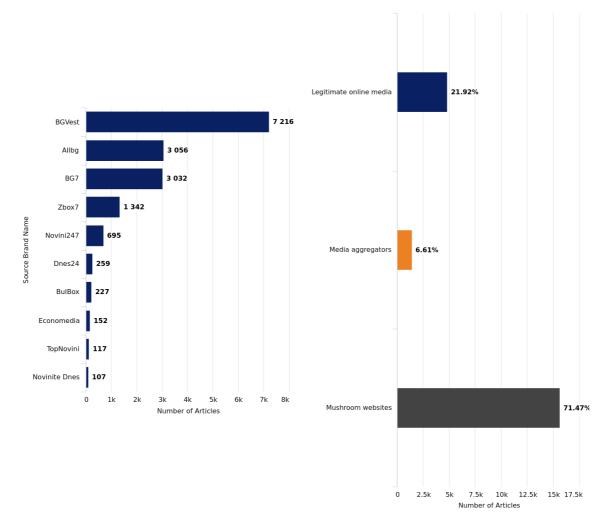


11.1.3 Overview of political parties mentions per source type

Table 82:The chart illustrates the volume distribution of the political parties within the narrative, broken down
by source type: legitimate online media, mushroom websites and media aggregators.

PP-DB and GERB-SDS dominated the conversation, particularly in the context of their agreement to reform the Anticorruption Commission (Radio Free Europe). GERB-SDS was also mentioned in June 2023 by legitimate media when the Parliament adopted at first reading the party's draft of the Anticorruption Law (Dnevnik). PP-DB received attention across all source types, with mushroom websites focusing on the party in their coverage, possibly due to the sensational nature of the news involving key party figures in the Anticorruption Commission's investigations (BG7 republishing Blitz).

ITN was frequently mentioned on mushroom websites due to the public interest in party leader Slavi Trifonov's asset declaration (Blitz). Vazrazhdane received a smaller overall number of mentions but had a substantial relative presence on mushroom websites, highlighted by reports on conflict of interest allegations by one of the party's deputies against an official in the Bulgarian National Bank (<u>4vlast</u>). The BSP mentions were sparse, primarily linked to parliamentary proceedings (<u>BNR</u>), suggesting that the party's role in the narrative may have been less controversial or simply less reported on by the media. DPS was also noted mainly in the context of parliamentary proceedings (<u>Actualno</u>).



11.1.4 Overview of the top online sources and source type distribution

Table 83:The charts display the top 10 sources that commented on the narrative and the volume distributionper source type: legitimate online media, mushroom websites and media aggregators.

Mushroom websites such as BGVest, Allbg, BG7 and Zbox7 led in the number of published articles, which aligns with the typical behaviour of these sites to rapidly disseminate content on trending topics. Media aggregators like Novini 247 and BulBox published a lower number of articles. Economedia stood out as a legitimate news source in the top 10. As a publisher of both Capital and Dnevnik, Economedia's presence indicates that authoritative news sources maintain their key role in reporting on crucial legislative reforms.



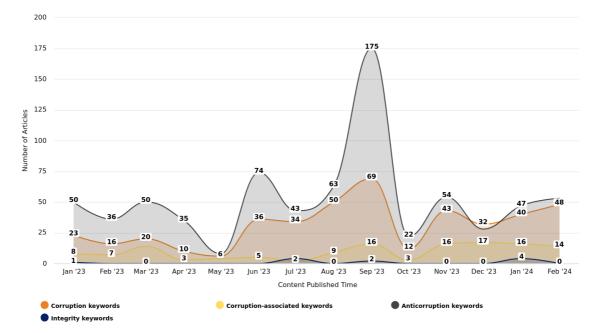
200 181 175 150 125 Number of Articles 100 75 70 50 38 35 25 21 20 12 10 0 lan '23 May '23 Jul '23 Nov '23 Feb '24 Feb '23 Mar '23 Apr '23 Jun '23 Aug '23 Sep '23 Oct '23 Dec '23 Jan '24 Content Published Time Posts Comments

11.2.1 Overview of volume distribution of original posts and comments

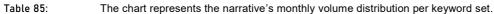
The posts' peaks followed similar patterns to those of the content from legitimate online media and aggregators and were caused by the news websites' Facebook pages sharing their articles.

The posts spiked in September 2023 due to media coverage of the conditions for selecting the Anticorruption Commission members. Comments varied, with some criticizing the same parties pushing for Constitutional changes — aiming for direct control over the Prosecutor's Office — for trying to adopt an anticorruption law, while others underscored the law's importance. In November 2023, over half of the original posts were related to Borislav Mihaylov, the President of the Bulgarian Football Union, who was called for questioning by the Anticorruption Commission (BNT). An identical comment, found on multiple media outlets' Facebook pages during that month, accounted for half of all comments during the period. It stated that the Commission for Anticorruption and Illegal Assets Forfeiture (CACIAF) had twice identified property declaration violations in the filings of Rositsa Mateva, vice chair of the Central Electoral Commission.

Table 84:
 The chart represents the narrative's monthly volume distribution divided by type of activity: posts and comments.



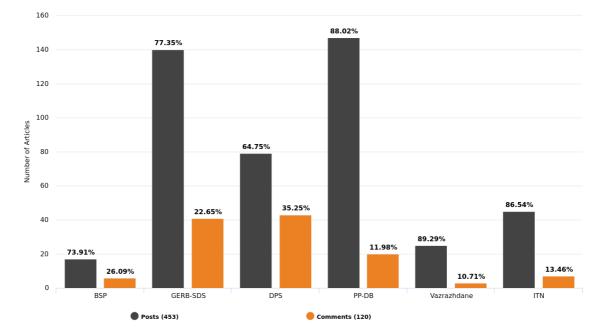
11.2.2 Overview of the four keyword sets



The most mentioned keyword set was the anticorruption one, followed by corruption, corruption-associated keywords and integrity. Interestingly, the corruption-associated keywords were used less frequently than in online media, while the use of corruption remained similar.

The content containing corruption-associated keywords was primarily published by media Facebook pages sharing articles about the Anticorruption Commission investigating various cases.

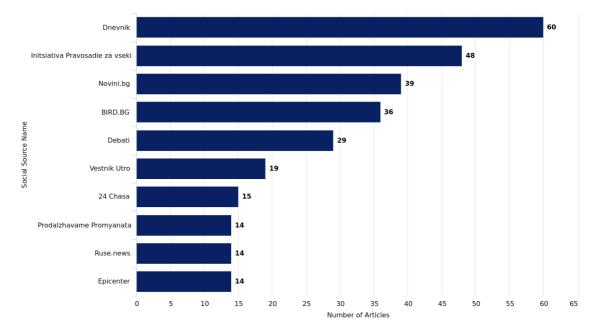
The usage of integrity in the context of the narrative was mainly observed in a few pages, specifically the European Commission (EC) in Bulgaria, Europe Direct — an entity run by the EC to answer questions related to the European Union — and in related regional pages, as well as in posts by Da, Bulgaria!. The EC posts were related to the 2023 Rule of Law Report, which recommended that Bulgaria improve integrity among senior positions in the executive branch by clearly establishing integrity standards for the government. Da, Bulgaria!'s posts concerned a resolution issued by the political party, outlining its priorities for government negotiations led by Maria Gabriel, with integrity checks being a focus of the said resolution.



11.2.3 Social coverage of the political parties

 Table 86:
 The chart illustrates the Facebook engagement with the narrative, broken down by political parties and type of activity: posts and comments.

The two political formations that received the most coverage were GERB-SDS and PP-DB, followed by DPS, ITN, Vazrazhdane and BSP. GERB-SDS was most often mentioned in posts from June 2023, when tensions related to the parliamentary vote for the Anticorruption Law arose between the party and PP-DB (Dnevnik). PP-DB garnered significant attention in September 2023, as the party's co-chair Kiril Petkov discussed the importance of adopting the Anticorruption Law, highlighting its implications for the country's Schengen area membership (Vesti). The content peak related to DPS occurred in January 2024 when the Anticorruption Fund urged acting Chief Prosecutor Borislav Sarafov, the Anticorruption Commission and the State Agency for National Security to investigate party chair and MP Delyan Peevski (OFFnews). ITN was in the spotlight in March 2023, when CACIAF decided not to enforce a court decision and concealed the results of ITN party leader Slavi Trifonov's property inspection (Boulevard Bulgaria). Vazrazhdane was prominently mentioned in December 2023, when party MP Dimo Drenchev notified the Anticorruption Commission about an alleged conflict of interest involving Andrey Gyurov, deputy director of the Emissiono [Emission] department of the Bulgarian National Bank, who is also an MP from PP (UtroRuse). BSP was the least mentioned political party and appeared in a repetitive comment under a few media outlets' Facebook pages in January 2023. The author alleged nepotism in various positions, including those in the executive branch such as the Anticorruption Commission. The commenter also claimed that GERB-SDS, DPS and BSP were all interconnected.



11.2.4 Top 10 social authors

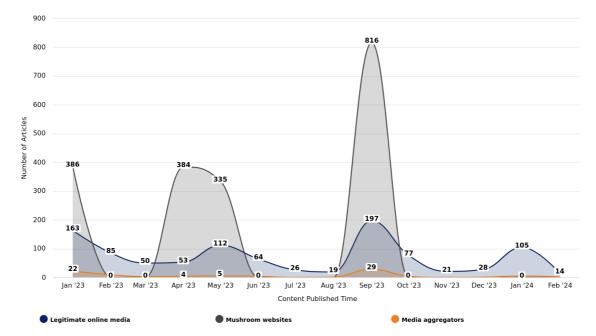
 Table 87:
 The chart displays the top 10 social authors who posted on or received comments related to the narrative during the monitored period.

The online media outlets' Facebook pages were the most prominently represented in the top 10 social authors, with Dnevnik, a legitimate online media source, being the most active in the context of the narrative. Moreover, all remaining media Facebook pages in the top 10 belong to legitimate outlets (Novini.bg, BIRD, Debati, Vestnik Utro, 24Chasa, Ruse.news and Epicenter). The presence of the Facebook page of the citizen group Initsiativa Pravosadie za Vseki [Justice for All Initiative] in the top 10 showcases the group's interest in the narrative. It is worth noting that PP's page (Prodalzhavame Promyanata) was also among the most prominent social authors. It was most active in September 2023 when it echoed the commentary of the party's chair, Kiril Petkov, concerning the adoption of the Anticorruption Law.

12 The adoption of the Whistleblower Act

In 2023, Bulgaria engaged in pivotal discussions on the Whistleblower Protection Act, which aims to create a framework for the safeguarding of individuals who report unlawful activities within organizations. The proposal sought to encourage accountability by offering legal protection to whistleblowers, which would ideally contribute to the detection and prevention of corruption. The dialogue around the legislation unfolded with a spectrum of opinions, highlighting the complexity of ensuring adequate protection against potential retaliation, while also considering the risk of false allegations (DARIK). Moving into early 2024, the legislative process involved fine-tuning the Act to balance these concerns, indicating a measured approach toward its finalization and implementation (BTA). The evolution of the Act's discourse is indicative of Bulgaria's ongoing efforts to establish a more transparent governance environment.

12.1 Deep-dive analysis of the online content



12.1.1 Overview of the narrative coverage segmented by source types

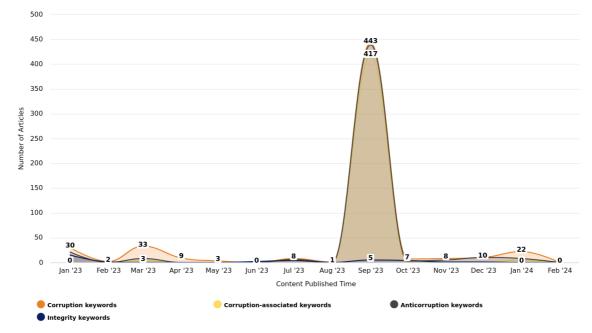
Table 88:The chart represents the narrative's monthly volume distribution divided according to the three sourcetypes: legitimate online media, mushroom websites and media aggregators.

A significant surge in the content from mushroom websites was seen in September, when the media covered the National Assembly's final decision on the legislation combating corruption, according to which reports in the media will not be considered signals of corruption at the high levels of government. However, the members of the Parliament confirmed that signals could be received from all regulated channels for internal or external submission following the Whistleblower Protection Act (BNR).

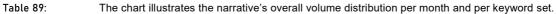
Legitimate sources and media aggregators showed less pronounced but consistent interest over the year, with legitimate sources peaking modestly in the initial months following the adoption of the bill on first reading, as evident from the content peak in January 2023 (<u>Actualno</u>).

Meanwhile, media aggregators witnessed a small increase in coverage towards the second half of the year, primarily due to the changes adopted to the Act in September (<u>ChasPic</u>).

The data indicates that although the topic was covered steadily by legitimate sources, mushroom websites played a major role in driving the discussions at particular times, influencing the volume of the narrative.



12.1.2 Overview of the four keyword sets

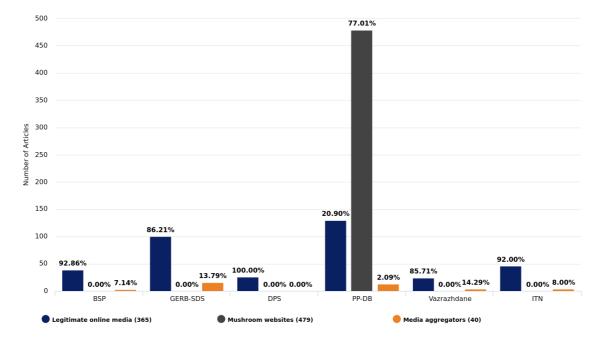


The data indicates a significant peak in September 2023 across corruption, corruptionassociated and anticorruption keywords, coinciding with the National Assembly's decision on anticorruption legislation. This decision emphasized that media reports would not be regarded as signals of corruption and the latter would instead be received under the Whistleblower Protection Act (<u>Blitz</u>).

The interest in the integrity keywords was notably lower, with the highest number detected in January 2023 after the Group of States against Corruption published its evaluation report on Bulgaria, highlighting the need for an obligation to report misconduct related to integrity within the police force and the need for comprehensive legislation to protect whistleblowers (<u>Radio Free Europe</u>).

January 2023 and March 2023 were marked by balanced attention to corruption and anticorruption, suggesting a period of active discussion or reform. In March, President Rumen Radev pointed out that the caretaker government had taken several actions against corruption, including the adoption of the Whistleblower Protection Law (24Chasa).

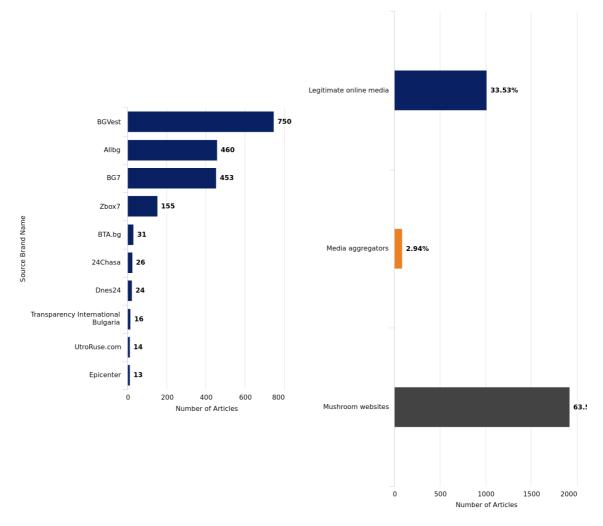
By January 2024, the number of articles decreased significantly across all keyword sets, which indicates a decrease in public interest.



12.1.3 Overview of political parties mentions per source type

 Table 90:
 The chart illustrates the volume distribution of the political parties within the narrative, broken down by source type: legitimate online media, mushroom websites and media aggregators.

PP-DB stood out with a high number of mentions, particularly from mushroom websites. The mentions were tied to key events such as the passing of the Whistleblower Protection Act earlier in the year (TopNovini) and the appointment of Stoyu Stoev as the chair of the parliamentary Legal Affairs Committee in May 2023 (BGVest). Stoev is an author of several bills, including the one on the Whistleblower Act. The disparity in coverage suggests a potential overrepresentation of PP-DB in the media discussions driven by non-organic content from mushroom websites. Such disproportionate attention may skew the perceived prominence of PP-DB's role in the adoption of the Act, overshadowing the contributions or positions of other parties. GERB-SDS, although less prominent, also received various mentions. Similarly, BSP, ITN, DPS and Vazrazhdane had a limited presence in the discussions, indicating involvement but to a lesser degree than PP-DB, which points to these parties' narrower impact on this specific reform. This could also indicate that while they participated in the dialogue surrounding the Whistleblower Act, they did not lead the conversation or their contributions were not highlighted as often by the media.



12.1.4 Overview of the top online sources and source type distribution

 Table 91: The charts display the top 10 sources that commented on the narrative and the volume distribution per source type: legitimate online media, mushroom websites and media aggregators.

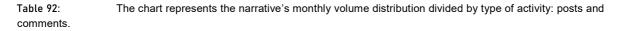
Mushroom websites led the coverage of the narrative, contributing with nearly twothirds of all articles. Legitimate online media also engaged with the topic, but less so, while media aggregators played a minimal role in the discussion.

The mushroom websites BGVest, Allbg and BG7 were the top three media outlets, with BGVest leading by a significant margin. This indicates concentrated coverage from a few key sources. The presence of specialized sources like Transparency International Bulgaria suggests that the Act also attracted attention from organizations with a vested interest in anticorruption measures.

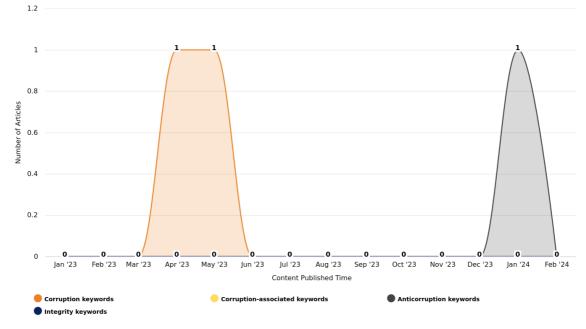
12.2 Deep-dive analysis of Facebook coverage

16 14 12 10 Number of Articles 8 4 2 0 0 0 0 0 0 0 0 0 0 Jan '23 Feb '23 Mar '23 Apr '23 Jun '23 Jul '23 Sep '23 Oct '23 Nov '23 Dec '23 Jan '24 May '23 Aug '23 Feb '24 Content Published Time Posts 🛑 Со ents

12.2.1 Overview of volume distribution of original posts and comments



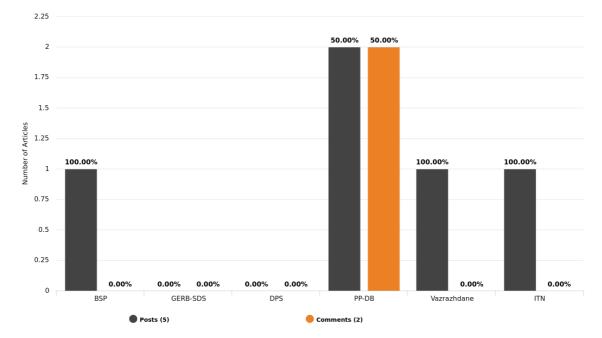
The Facebook discussions were sporadic throughout the year and were primarily driven by specific posts rather than user comments, with a notable spike in September 2023. This increase corresponds with the National Assembly's discussion on amending the legislation, highlighting a moment of concentrated public interest and discourse on the platform. Outside of this period, both posts and comments remained relatively low.



12.2.2 Overview of the four keyword sets

Table 93: The chart represents the narrative's monthly volume distribution per keyword set.

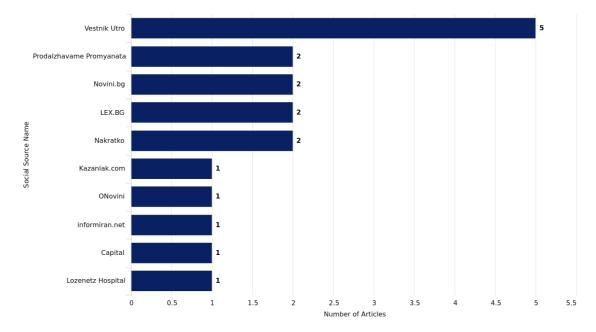
The Facebook mentions of the four keyword sets within the context of the narrative were minimal throughout the monitored period. This low frequency indicates that, although the topic was present, it did not resonate strongly with the audience. Occasional references to anticorruption, as seen in a post by the Banker newspaper's official page, as well as to corruption, appeared to be isolated instances rather than part of a broader, ongoing conversation.



12.2.3 Social coverage of the political parties

Table 94:The chart illustrates the Facebook engagement with the narrative, broken down by political partiesand type of activity: posts and comments.

Facebook users scarcely referenced the political parties involved in the Former National Assembly proceedings. PP-DB received limited attention, with only two posts (originating from the official PP page) and two comments. Similarly, BSP, Vazrazhdane and ITN received a minimal number of mentions, each appearing once in a post shared by the newspaper 19min. The post highlighted their collective vote against the amendments to the Whistleblower Act. These sparse mentions indicate a general lack of engagement with the political parties in the context of the narrative.



12.2.4 Top 10 social authors

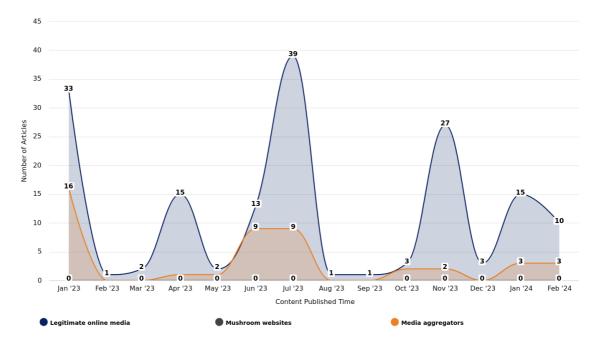
Table 95:The chart displays the top 10 social authors who posted on or received comments related to thenarrative during the monitored period.

The chart reveals that the discourse was spearheaded by a select few, mainly Facebook pages of news outlets, with Vestnik Utro being the most vocal, contributing with five articles. Notably, the official page of the political party PP (Prodalzhavame Promyanata) shared two posts on the matter. In addition, the presence of a healthcare institution suggests that the discussions touched upon the Act's impact on specific sectors like healthcare.

13 Lobbying regulation

The efforts to establish a legal framework for lobbying in Bulgaria have been a point of interest throughout 2023, underscored by critiques from both local and international bodies. GRECO's report from the beginning of 2023 highlighted the inefficiency of Bulgaria's judiciary and media dependency, underscoring the absence of lobbying legislation and transparency in high-level positions, which impedes effective corruption risk assessment and execution of power (<u>BNR News</u>). In June 2023 Former Justice Minister Atanas Slavov announced intentions to initiate discussions for a lobbying law, aiming for consensus across political parties (<u>Radio Free Europe</u>). This was further echoed in a meeting with US Ambassador Kenneth Merten, where Slavov reiterated his commitment to judicial reforms, anti-corruption measures, and lobbying regulation as crucial government mandates (<u>OFFNews</u>). Finally, the Ministry of Justice advanced these efforts by releasing a Concept for lobbying regulation, defining clear rules and accountability mechanisms, and proposing the establishment of a transparency register, set to improve legislative transparency and prevent corruption (<u>Lex News</u>).





13.1.1 Overview of the narrative coverage segmented by source types

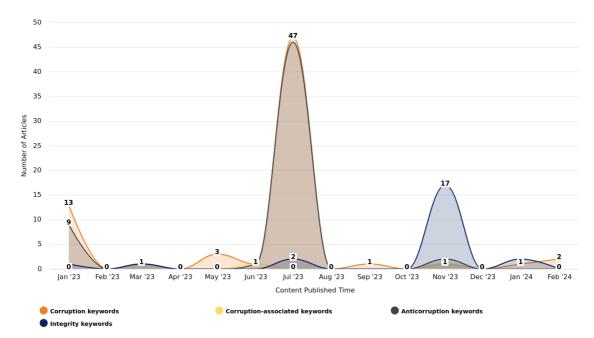
Table 96:The chart represents the narrative's monthly volume distribution divided according to the three sourcetypes: legitimate online media, mushroom websites and media aggregators.

The publications from online media sources on the lobbying regulation in Bulgaria were concentrated in a few months during 2023, namely, January, July and November. Notably, there was no mushroom website coverage related to the narrative, while media aggregators republished articles from various legitimate media sites.

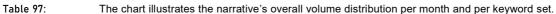
In January, a third of all content was republished by media aggregators, while the main topic of discussion related to the narrative in both legitimate online media and aggregators was a statement made by then-Chief Prosecutor Ivan Geshev on the Nexo case that Bulgaria lacks a lobbying law, which impedes the ability to track activities and would lead to success if such a law existed (DARIK).

The July spike coincided with Former Minister of Justice Atanas Slavov meeting the US Ambassador to Bulgaria Kenneth Merten. Slavov expressed his ambition to have a lobbying law presented for public discussion in the autumn of 2023 (<u>BTA</u>).

The last major spike, in November 2023, was marked by the Ministry of Justice releasing the Concept for lobbying regulation for public discussion (<u>Lex News</u>).



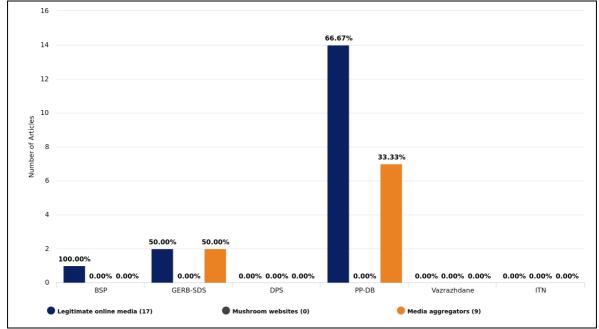
13.1.2 Overview of the four keyword sets



The most frequently used keywords in the context were corruption, followed by anticorruption, integrity and lastly, corruption-associated words.

The usage of corruption and anticorruption was concentrated in July 2023 due to the statement made by Former Justice Minister Spasov during his meeting with the US Ambassador Kenneth Merten on fighting corruption (<u>Bulgaria ON AIR</u>), as well as Spasov's comments about the upcoming measures against corruption and that regulating lobbying was among the actions slated for parliamentary consideration in the coming months (<u>DARIK</u>).

The peak of integrity usage was in November 2023 in the context of the commitments made by Bulgaria for the joining of the OECD, which include the creation of a national legal framework for lobbying transparency and integrity (<u>168Chasa</u>).



13.1.3 Overview of political parties mentions per source type

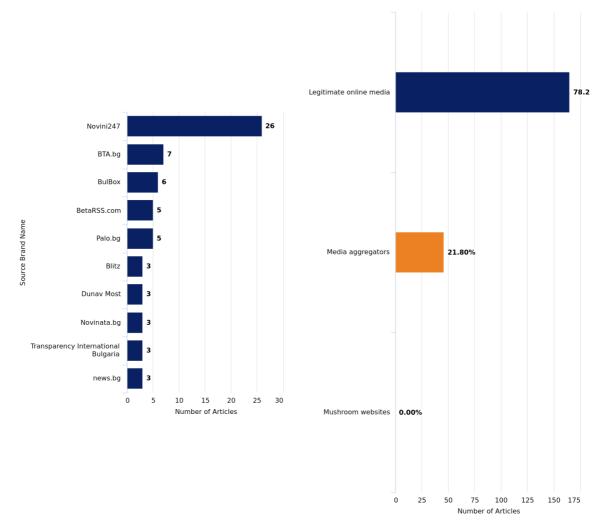
Table 98:The chart illustrates the volume distribution of the political parties within the narrative, broken down
by source type: legitimate online media, mushroom websites and media aggregators.

In the narrative's context, PP-DB was the most mentioned political entity, followed by GERB. BSP received only one mention during the coverage period.

PP-DB was primarily mentioned in articles referencing the Former Minister of Justice Atanas Spasov, who was a member of PP-DB (<u>News.bg</u>). GERB-SDS was noted briefly in the context of regulating lobbying as the media commented on the joint cabinet between GERB-SDS and PP-DB (<u>Radio Free Europe</u>).

BSP's limited coverage came from the website of the newspaper <u>Zemya</u>, which cited the party's MP Borislav Gutsanov's statement in parliament that the draft for the lobbying law would destroy both the Black Sea region and the tourism sector.

DPS, Vazrazhdane and ITN were not mentioned in the context of the narrative.

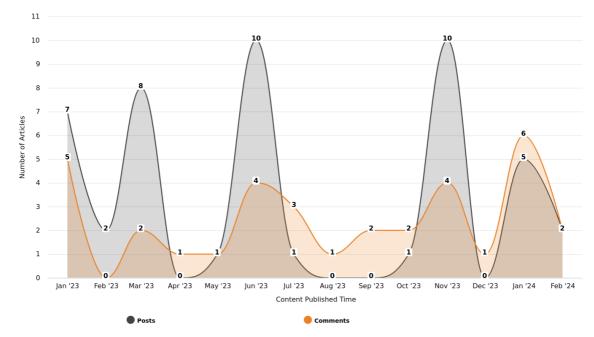


13.1.4 Overview of the top online sources and source type distribution

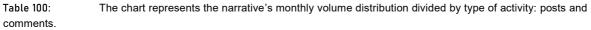
Table 99:The charts display the top 10 sources that commented on the narrative and the volume distributionper source type: legitimate online media, mushroom websites and media aggregators.

The narrative was covered mainly by legitimate media outlets followed by media aggregators, with mushroom websites being notably absent. The source with the most publications, related to the narrative was the media aggregator Novini247, which republished articles from various legitimate online media. The other two media aggregators among the top 10 sources were Bulbox and BetaRSS.com. The remaining seven websites were all legitimate online media. Transparency International Bulgaria notably made an appearance among the top 10 sources with three publications dedicated to the efforts for regulating lobbying and the Ministry of Justice's <u>Concept for lobbying regulation</u>.

13.2 Deep dive analysis of Facebook coverage



13.2.1 Overview of volume distribution of original posts and comments

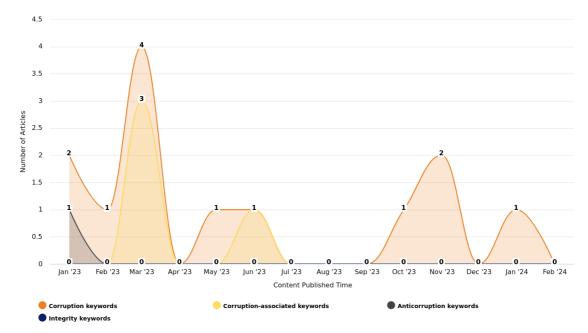


The content peaks on Facebook followed similar patterns to those in online media: January, June, and November 2023. Notably around 40% of the Facebook content in January consisted of comments.

The comments in January 2023 often observed that there was not a lobbying law in Bulgaria and reasoned that this allowed for corruption. The posts, on the other hand, echoed then-Chief Prosecutor Ivan Geshev's statement that there were no lobbying laws in the country.

In June 2023, the original posts came from news websites sharing articles related to Former Justice Minister Atanas Slavov's intentions to have a lobbying law draft in the autumn, with most of the comments saying that there is a need for such a law.

Similarly to online media, the peak of posts in November 2023 was caused by the Ministry of Justice announcing the Concept for lobbying regulation.



13.2.2 Overview of the four keyword sets

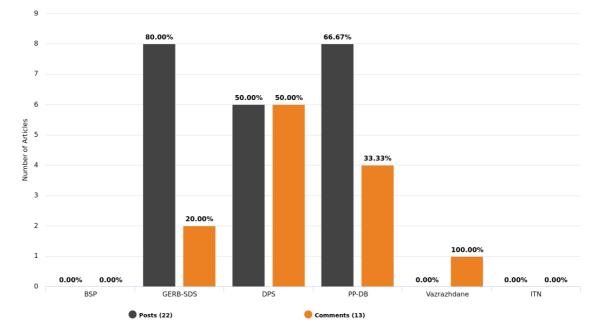


Corruption was the most used keyword in the context of the narrative, followed by the corruption-associated keywords. Anticorruption keywords received almost no mentions while integrity wasn't used at all in the social media network.

The discussion surrounding corruption in the context of the narrative was polarized with some commenters saying that a lobbying regulation would essentially mean the legalization of corruption while others said that it would lead to transparency and not corruption.

The corruption-associated keywords were used in posts, discussing the tasks of the Former Justice Minister Atanas Slavov, among which are progress on constitutional reform, investigation of whether there was pressure on members of the Supreme Judicial Council to make certain decisions, halting the procedure for the selection of a new Chief Prosecutor, a law on lobbying.

Anticorruption was mentioned in a comment that discussed a large number of topics related to the political situation in Bulgaria, including the country's position in a couple of indexes such as Transparancy International's corruption index for 2022, and quoted Transparancy International's Vanya Kushkeeva-Nusheva who according to the comment said that lobbying in Bulgaria is not yet regulated.



13.2.3 Social coverage of the political parties

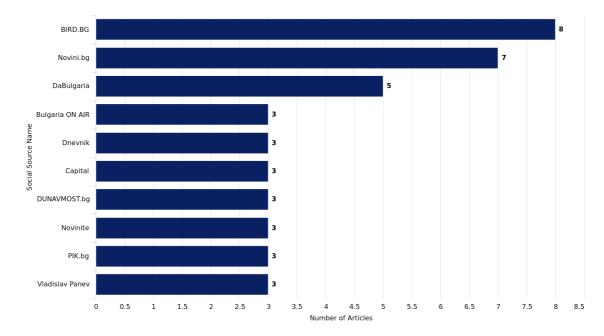
Table 102:The chart illustrates the Facebook engagement with the narrative, broken down by political partiesand type of activity: posts and comments.

The political parties with the highest overall volume of mentions were DPS and PP-DB, followed by GERB-SDS. Vazrazhdane received only one mention, while BSP and ITN were not mentioned in the context of the narrative.

Mentions of DPS involved commenters sharing the view that a potential lobbying law would be harmful to the party. PP-DB was also noted in comments urging the political formation to pass such laws.

GERB-SDS received more attention through posts than comments, indicating a moderate level of public interest and discourse.

Vazrazhdane was mentioned in a comment under the Da, Bulgaria!'s Facebook post related to the Ministry of Justice's proposal of a Concept for lobbying regulation, stating that Vazrazhdane had previously proposed such legislation.



13.2.4 Top 10 social authors

Table 103:The chart displays the top 10 social authors who posted on or received comments related to the
narrative during the monitored period.

The top 10 social authors were primarily the Facebook pages of online media outlets. Novini.bg, Bulgaria ON AIR, Dnevnik, Capital, Dunav Most and Novinite were active in sharing their articles. Notably, BIRD (Bureau for Investigative and Reporting Data) published multiple posts related to various issues including lobbying frameworks. Da, Bulgaria!'s page was among the top three, highlighting the interest in the activity of the member of the party and former Minister of Justice Atanas Slavov. Interestingly, DB's MP from the last 48th National Assembly, Vladislav Panev's profile also garnered enough attention to make it to the top 10 with commenters urging for lobbying law.